



# Statement on modern slavery 2023





# Statement

In line, with section 11 of Fighting Against Forced Labor and Child Labor in Supply Chains Act (Canadas Bill S 211 Act), Vitro and subsidiaries issued the present statement outlining their stance on combating child labor and forced labor in the year 2023.

Despite efforts, modern slavery and child labor remain persistent challenges in today's society.

Modern slavery encompasses forms of exploitation such as forced labor, debt bondage and human trafficking while child labor involves children being engaged in work that poses risks to their well-being and development.

Vitro is committed to preventing all forms of child and forced labor in its operations and supply chain and is committed to implementing measures to achieve this goal.

The progress made in 2023 marks the beginning of Vitro's efforts in this regard as the company remains steadfast, in its mission to strengthen actions and partnerships aimed at combatting child and forced labor while upholding business ethics and human rights principles.

We recognize that putting an end to these practices requires collaboration with our supply chain and other involved parties, we are committed to doing our part to support this objective.

To the best of my knowledge, and having exercised reasonable diligence, I attest that the information provided in this report is true, accurate and comprehensive for the year as required by the Act.

Name: Adrian Meouchi Cueva

Position: Global Procurement VP

Date: May 30, 2024.

Signature

"I have the authority to bind 'Vitro Flat Glass Canada Inc,"





# Vitro 's operations

Vitro is one of the largest glass manufacturers in North America and the world, providing a wide range of glass solutions to diverse markets including: cosmetics, spirits, fragrances, pharmaceuticals, architectural glass and automotive glass.

We have operations in several countries as shown below:

ARCHITECTURAL	
Entity	Location
Vitro Arquitectónico España, S.L.U.	Spain
Vitro Flat Glass LLC.	USA
Vitro Meadville Flat Glas LLC.	USA
Vitro Flat Glass Canada Inc.	Canada
Especialidades en Cristal, S.A. de C.V.	
llumimex, S.A. de C.V.	
Soluciones Vitro Plano, S.A. de C.V.	Mexico
Vidrio Plano de México, S.A. de C.V.	
Vitro Arquitectónico, S.A. de C.V.	

CHEMICALS		
	Entity	Location
Industria del Álcali, UE, S.L.U		Spain
Vitro Chemicals, Fibers & Mining LLC.		USA
Industria del Álcali, S.A. de C.V.		Mexico

CONTAINERS	
Entity	Location
Vitro Empaques, S.L.U	Spain
Vitro Do Brasil Industria e Vidrio e Comercio, Ltda.	Brazil
Vidriera Toluca S.A. de C.V.	Mexico
Vitro Envases, S.A. de C.V.	
Fabricación de Maquinas S.A. de C.V.	
Vitro Automatización, S.A. de C.V.	

AUTOMOTIVE		
Entity	Location	
Vitro Automotriz UE, S.L.U.	Spain	
Pittsburgh Glass Works LLC.	USA	
Vitro Autoglass LLC.	USA	
Vitro Automotive Glass Canada Ltd	Canada	
PGW Technik GmbH	00000000	
Pittsburgh Glass Works, GmbH	Germany	
Pittsburgh Glass Works Hong Kong, Limited	Hong Kong	
Pittsburgh Glass Works, S.ar.l.	Luxembour	
Pittsburgh Glass Works, Sp.z.o.o	Poland	
Shandong PGW Jinjing Automotive Glass Co.Ltd	China	
Vitemcoecuador, S.A.	Ecuador	
Vitro Colombia, S.A.S.	Colombia	
Vitro Panamá, S.A.	Panama	
Cristales Automotrices, S.A. de C.V.	Mexico	
Cristales Inastillables de México, S.A. de C.V.		
Cristales y Servicios, S.A. de C.V.	Mexico	
Vitro Vidrio Automotriz, S.A. de C.V.		

CORPORATE		
Er	ntity	Location
Vitro Assets Corp.		USA
Aerovitro, S.A. de C.V.		Mexico
Vitro Vidriera Monterrey, S.A. de C.V.		Mexico

### Organizational structure:

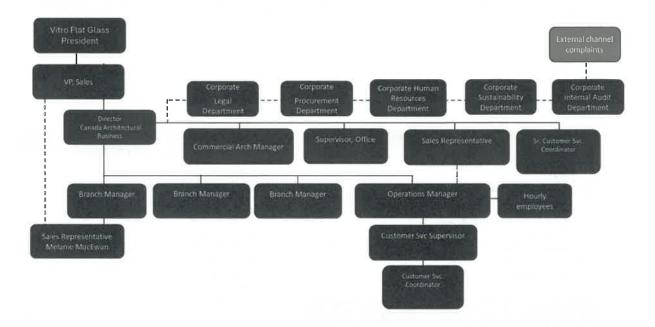
We have an organizational structure that allows for specialization and delegation of functions, as well as transversal and multidisciplinary working teams that allow for a level of best practices in our operations and compliance with legal requirements required in each business unit and according to the regulations of each country in which we operate.







# Organizational structure for operating in Canada:



The Sustainable Procurement Policy outlines the responsibilities of the various areas involved in ensuring supplier compliance with ESG standards, including respect for human rights and the avoidance of child, and forced labor:

- Procurement is responsible for evaluating suppliers with respect to human rights and assurance process.
- Internal audit department:
  Responsible for monitoring procurement performance
  Review of reports received from the external complaint channel and, if necessary,
  referral of complaints to the Ethics Committee for response in accordance with the
  protocol for human rights violations (child labor, forced labor).
- Sustainability Department:
  Responsible for supporting and advising the Procurement Department on any improvements or new regulations to be observed in the management and requirements of suppliers,
  Communicates such requirements to senior management and the internal audit department for follow-up and inclusion in the audit program.





Legal Department:

Responsible for ensuring compliance with all laws and regulations.

## **Employees:**

Regional distribution of employees			
Region	Number	%	
EUROPE & ASIA	292	2%	
USA	2416	16%	
CANADA	119	1%	
MEXICO	11544	79%	
LATAM Y CARIBE	293	2%	
TOTAL	14664	100%	

#### Supply Chain:

Vitro counts with a Procurement team at our Corporate Headquarters accountable for the purchasing process globally, this team is focused on define and execute the Procurement Strategy to support the accomplishment of Vitro's business objectives.

The main activities of this team are sourcing, supplier onboarding and development, terms and conditions negotiation, cost reduction initiatives to support our business competitiveness, ESG's supplier assurance among other activities.

The main Purchasing categories managed by the Procurement Corporative Team are as follows:

- Raw Materials: Silica Sand, Soda Ash, Dolomite, Limestone, Cullet.
- Packaging: Cardboard Boxes, Plastic Bags, Interleaving Powder, Plastic Wrap.
- Transportation: Inbound and Outbound Freight, Custom Agent Services.
- Energy: Natural Gas, Electricity, Technical Gases.
- Services: General and Administrative Services, Equipment Leasing, Equipment Maintenance Services, Building Leasing.
- Capital Expenditures: New Equipment Acquisition, Mayor Repairs, Construction Services.
- Indirect Materials: Operation Consumables, Spare Parts, Personal Protection Equipment, Miscellaneous.







# Supply Chain in Canada:

Our Canadian operations primarily procure the majority of their glass products for Insulating Unit fabrication from Vitro glass plants situated in the US. However, we also source certain specialized glass products, such as Pattern glasses and laminated glass, from suppliers in China, filling specific gaps in our product offerings.

Beyond the procurement of raw materials, our branches play a multifaceted role in the glass industry. In addition to fabricating Insulating Units for the residential market, they serve as distribution hubs, offering glass in full packs or tailored to customer specifications. Furthermore, our operations involve the acquisition of various consumable materials necessary for raw glass processing and value-added services. These materials are predominantly sourced from suppliers located in Canada and the US, ensuring streamlined supply chain operations and facilitating efficient production processes.

# Policies and internal procedures

Our policy, on human rights reflects our commitment to upholding human rights in all aspects of our business. It ensures that key areas such as Human Resources and Procurement follow procedures to comply with labor laws and international standards, reducing the risk of violations or negative impacts from non-compliance.

Additionally, this policy clearly prohibits child labor forced labor and human trafficking demonstrating our commitment to behavior and safeguarding human rights, especially those of children. It also emphasizes the importance of preventing corruption as a part of our efforts to protect human rights and maintain ethical values.

Both our Human Rights Policy and Sustainable Procurement Policy include processes for conducting due diligence to prevent or address any negative impact arising from our activities or in our supply chain.

These processes involve an accessible complaints system and clear guidelines for supporting and monitoring affected individuals to ensure efficient responses are in place.

By following these policies and procedures we uphold our commitment to support and defend human rights all the while fostering an environment that values and respects rights for all individuals, in the workplace.





# Related polices to Child labor and forced labor prohibition:

- Human Rights Policy
- Sustainable Procurement
- o Anti- bribery Policy
- Conflict of interest Policy
- o Code of conduct

### Gobernance

Final responsibility for overseeing efforts to combat forced labor and child labor in our operations remains with the Governance Steering Committee, led by our Chief Financial Officer, who chairs the Governance Steering Committee. The Executive Committee holds the authority and responsibility for approving policies and strategies to address forced labor and child labor issues within our organization and it delegates the authority and responsibility to the Executive Directors to implement the business strategy and policies.

# **Training**

Vitro has undertaken comprehensive measures to ensure strict compliance with regulations prohibiting the employment of minors and forced labor.

Our Human Resources personnel have undergone extensive training on relevant laws and labor rights pertaining to the employment of minors and forced labor. This training equips them with the necessary knowledge and understanding to effectively enforce these regulations within our organization.

Furthermore, our company's hiring policies are transparent and widely disseminated among hiring personnel. These policies mandate that all candidates undergo interviews before being considered for positions within our facilities. Moreover, the personnel responsible for hiring are required to conduct thorough verifications using official records to confirm that candidates are of legal working age. This stringent verification process applies to all candidates, including professional interns, thereby ensuring robust control mechanisms to prevent any potential issues related to child labor.

Additionally, we have implemented a specialized human rights training program for personnel involved in the supplier evaluation process. This program aims to raise awareness and provide guidance on identifying and preventing child labor within our supply chain. By equipping our supply personnel with the necessary knowledge and tools, we reinforce our commitment to ethical sourcing practices and the prevention of child labor across our entire supply chain.





These measures underscore Vitro's dedication to upholding the highest standards of ethical conduct and labor rights compliance. Through continuous training, clear policies, and proactive measures, we strive to create a work environment free from the exploitation of minors and forced labor.

# External whistleblower

We have not received any complaints on child labor or forced labor during 2023.

Nevertheless, we acknowledge that there is ample room for enhancement in our supplier management practices, particularly concerning suppliers situated in regions where regulatory frameworks or best practices regarding human rights, including the prevention of child and forced labor, may be lacking. In response to this imperative, we are committed to intensifying our efforts throughout 2024.

Central to our strategy is the development of an engagement framework designed to bolster supplier compliance with ESG (environmental, social, and governance) standards. This comprehensive strategy encompasses a multifaceted approach, including collaborative initiatives aimed at fostering improvement, targeted training programs, facilitating self-assessment mechanisms, and formalizing a statement of commitment from our suppliers. Furthermore, we will implement rigorous assurance processes to verify adherence to these standards, ensuring transparency and accountability across our supply chain. Through these concerted actions, we aim to fortify our commitment to ethical sourcing practices, foster sustainable supplier relationships, and uphold our principles of corporate social responsibility.