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# Statement on modern slavery 2024

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## Statement

In accordance with the requirements of the *Fighting Against Forced Labor and Child Labor in Supply Chains Act* (Canadas Bill S 211 Act), and in particular section 11 thereof, Vitro International Investments (Vitro) and its subsidiaries issues the present statement outlining our stance and progress on combating child labor and forced labor in the year 2024.

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 2024 was focused on improving our evaluation process and method for acquiring information from our supply chain.

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, 2025

Signature

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

## Executive Summary

In 2024, Vitro International Investments and its subsidiaries (“Vitro”) reaffirmed their commitment to eradicating forced labour and child labour within their operations and supply chains. This Modern Slavery Statement outlines the comprehensive measures taken to identify, assess, and mitigate risks associated with these unethical practices, in alignment with the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act.

### **Key Findings:**

- Vitro conducted a thorough risk mapping exercise, identifying high-risk sectors such as electronics and metallurgy in Mexico, the United States, and Canada.
- 10.5% of evaluated suppliers were flagged for potential non-compliance, representing 12.6% of Vitro’s procurement value.
- No confirmed cases of forced labour or child labour were identified in Vitro’s supply chain during 2024.

### **Actions Taken:**

- Strengthened governance and oversight mechanisms, including board supervision, supplier evaluations, and internal audits.
- Enhanced policies and due diligence processes, incorporating international best practices and regulatory updates.
- Provided targeted training and awareness programs to employees and suppliers.
- Implemented a robust whistleblower mechanism to report ethical concerns anonymously.

### **Commitments:**

- Vitro remains dedicated to continuous improvement in preventing and mitigating risks of forced labour and child labour.
- The company will expand its capacity to assess risks across all tiers of the supply chain and enhance supplier compliance monitoring.
- The company will continue to collaborate with stakeholders, monitor regulatory changes, and participate in international initiatives to ensure transparency and traceability in its supply chains.

This statement reflects Vitro’s unwavering dedication to ethical conduct and human rights, ensuring that all operations and supply chains are free from forced labour and child labour.

## Vitro structure, activities, and supply chains

Vitro is one of the largest glass manufacturers in the Americas, operating across multiple countries and serving a diverse range of industries. The company provides specialized glass solutions through four main business units:

- **Architectural Glass** – serving the construction and infrastructure sectors.
- **Inorganic Chemicals** – supplying inputs for the food industry and other industrial and commercial applications.
- **Glass Containers** – manufacturing bottles for the pharmaceutical, cosmetics, and liquor sectors.
- **Automotive Glass** – producing glass components for both light and heavy-duty vehicles.

Vitro’s corporate structure includes subsidiaries and operational entities in several countries, supporting a vertically integrated supply chain. The company sources raw materials and components from a global network of suppliers and maintains manufacturing, processing, and distribution facilities across North and South America.

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

CHEMICALS	
Location	Entity
Mexico	Industria del Alkali, S.A. de C.V.
Spain	Industria del Alkali UE SL y sociedades dependientes
USA	Vitro Chemicals, Fibers & Mining, LLC

CONTAINERS	
Location	Entity
Brazil	Vitro Do Brasil Industria e Vidrio e Comercio Ltda
Mexico	Vidriera Toluca, S.A. de C.V.
Mexico	Vitro Envases, S.A. de C.V.
Mexico	Vitro Fabricación de Máquinas, S.A. de C.V.
Mexico	Vitro Automatización, S.A. de C.V.
Spain	Vitro Empaques SL y sociedades dependientes
USA	Vitro Packaging, LLC

AUTOMOTIVE	
Location	Entity
China-Hong Kong	Pittsburgh Glass Works, Hong Kong Limited
Colombia	Vitro Colombia, S.A.S.
Ecuador	Vitemcoecuador, S.A.
Germany	PGW Technik GmbH
Germany	Pittsburgh Glass Works, GmbH
Luxemburg	Pittsburgh Glass Works, S.ar.l.
Mexico	Cristales Automotrices, S.A. de C.V.
Mexico	Cristales Inastillables de Mexico, S.A. de C.V.
Mexico	Cristales y Servicios, S.A. de C.V.
Mexico	Vitro Car, S.A. de C.V.
Mexico	Vitro Vidrio Automotriz, S.A. de C.V.
Panama	Vitro Panamá, S.A.
Peru	Cristales y Vidrios del Perú, S.A.C.
Poland	Pittsburgh Glass Works, Sp.z.o.o
Spain	Vitro Automotriz UE SLU (consolidado)
USA	Pittsburgh Glass Works LLC
USA	Vitro Autoglass LLC

CORPORATE	
Location	Entity
Luxemburg	Vitro International Investments SA
Mexico	Vitro Vidriera Monterrey
	Vitro, S.A.B. de C.V.

Vitro’s supply chains are complex and multi-tiered, involving both domestic and international suppliers. The company is committed to maintaining transparency and ethical standards throughout its operations and supply chains, and it actively monitors supplier practices to ensure compliance with applicable labour laws and international human rights standards.

## Organizational structure

Vitro's corporate governance framework is built on a robust system of policies, procedures, and oversight mechanisms designed to ensure the effective execution of its strategic objectives while upholding the principles of transparency, accountability, and sustainable value creation.

The **General Shareholders' Meeting** serves as the company's highest governing authority. It is responsible for approving the annual reports submitted by the Chief Executive Officer and the Board of Directors, and for appointing or ratifying members of the Board and its key committees, including the Audit and Corporate Practices Committee.

The **Board of Directors** is responsible for setting the company's strategic direction, overseeing the allocation of financial and operational resources, and evaluating senior management's performance. The Board consists of seven members, 42% of whom are independent, in accordance with recognized corporate governance standards. Each independent director submits a formal declaration of independence to the Chairman of the Board, affirming the absence of any conflicts of interest that could compromise their impartiality.

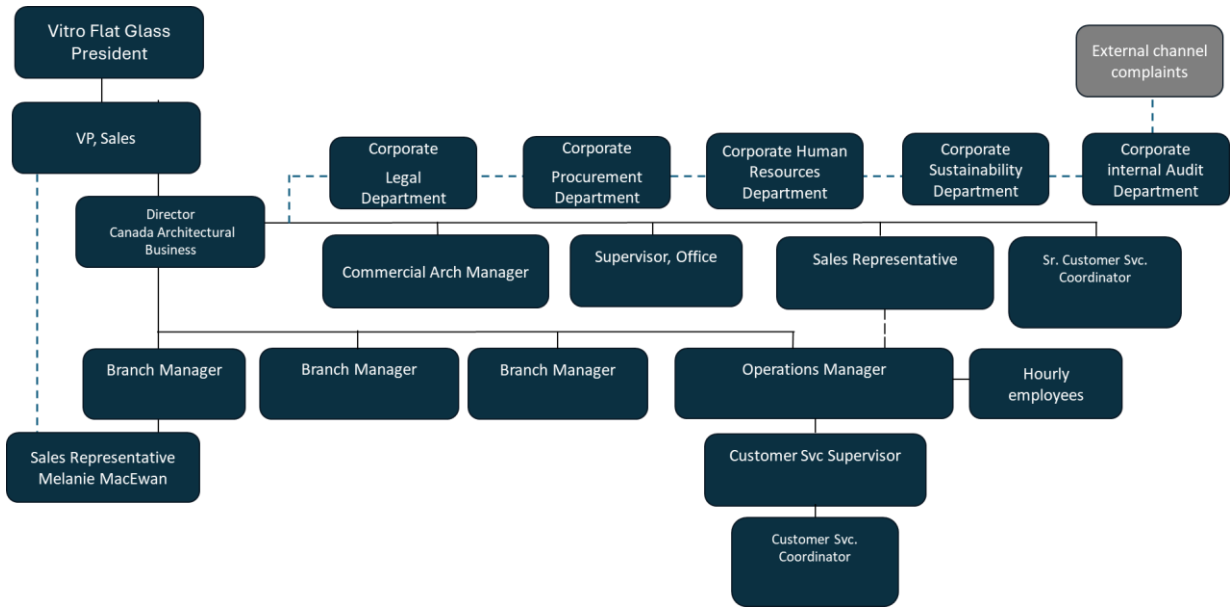
Board members are elected for one-year terms, with no statutory limit on reappointment, as outlined in Vitro's Corporate Bylaws. Except for the Chief Executive Officer and the Chairman, no directors maintain professional, financial, or personal affiliations with the company.

To support compliance in the supply chain with Environmental, Social, and Governance (ESG) standards—including the prohibition of forced and child labour—Vitro has implemented a **Responsible Procurement Policy** that clearly defines the roles and responsibilities of key departments:

- **Procurement Department**  
Conducts supplier evaluations, including assessments of human rights compliance and due diligence related to ESG criteria.
- **Internal Audit Department**  
Monitors procurement performance and reviews reports submitted through the external whistleblower channel. Where applicable, it refers complaints to the Ethics Committee for investigation and resolution in accordance with established protocols for addressing human rights violations.
- **Sustainability Department**  
Provides guidance to the Procurement Department on regulatory updates and best practices related to supplier management and ESG compliance. It also communicates relevant updates to senior management and the Internal Audit Department to ensure integration into audit programs.
- **Legal Department**  
Ensures that all procurement activities and supplier engagements comply with applicable laws, regulations, and internal policies, including those related to the prevention of forced and child labour.

This governance structure supports Vitro’s commitment to ethical business conduct and reinforces its ability to identify, prevent, and address risks related to forced and child labour across its operations and supply chains.

### Organizational structure in Canada



### Workforce Overview

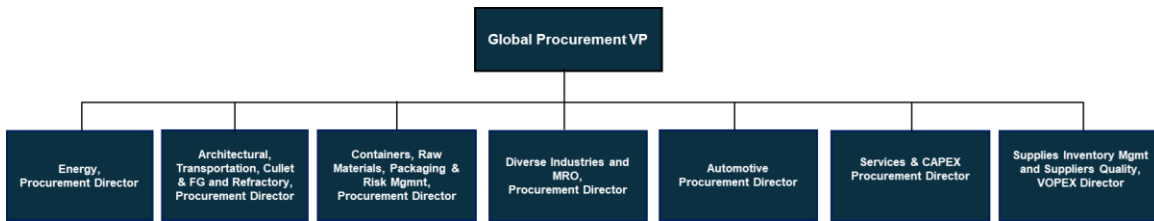
In 2024, Vitro employed more than **14,000 direct employees** across all regions and business units, reflecting a diverse, skilled, and stable workforce aligned with the company’s strategic goals for innovation, quality, and sustainable growth.

Over **95% of Vitro’s workforce** is employed under permanent contracts, underscoring the company’s commitment to long-term employment relationships and responsible labour practices. This approach supports workforce stability and reinforces Vitro’s compliance with international labour standards, including those prohibiting forced and child labour.

Regional distribution of employees		
Region	Number	%
CANADA	109	1%
MEXICO	11,409	79%
USA	2,372	16%
EUROPE & ASIA	273	2%
LATAM Y CARIBE	295	2%
<b>TOTAL</b>	<b>14,664</b>	<b>100%</b>

## Supply Chain Overview

Vitro maintains a centralized **Procurement Department** responsible for the global acquisition of goods and services. Structured by category, this department operates under a **Responsible Procurement Policy** that ensures alignment with the company’s strategic objectives, operational efficiency, and commitment to ethical sourcing.



## Key Procurement Categories

- **Raw Materials:** Silica sand, soda ash, dolomite, limestone, cullet.
- **Packaging Materials:** Cardboard boxes, plastic bags, interleaving powder, plastic wrap.
- **Transportation Services:** Inbound/outbound freight, customs brokerage.
- **Energy:** Natural gas, electricity, technical gases.
- **General Services:** Administrative services, equipment leasing/maintenance, facility leasing.
- **Capital Expenditures (CAPEX):** Equipment acquisition, major repairs, construction.
- **Indirect Materials:** Operational consumables, spare parts, personal protective equipment, and other supplies.

## Procurement Department Responsibilities

- Strategic sourcing and supplier selection.
- Supplier onboarding, development, and performance monitoring.
- Negotiation of commercial terms and conditions.
- Ensuring supplier compliance with Environmental, Social, and Governance (ESG) standards, including the prohibition of forced and child labour.
- Risk mitigation and continuity planning.

This structured approach ensures that procurement activities are conducted with transparency, due diligence, and full compliance with internal policies and applicable regulations, including those outlined in the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

## Supply Chain in Canada

Vitro's Canadian operations primarily source glass for Insulating Glass Unit (IGU) fabrication from its U.S.-based manufacturing facilities, ensuring alignment with corporate standards on human rights and ethical sourcing. Specialized glass products—such as patterned and laminated glass—are also procured from suppliers in China to meet specific demands in niche markets.

In addition to fabrication, Canadian facilities serve as **distribution centers**, offering glass in full packs or cut-to-size formats tailored to customer needs. These operations also involve the procurement of essential consumables—such as sealants, spacers, and protective packaging—primarily from suppliers in Canada and the United States. This regional sourcing strategy supports supply chain efficiency and minimizes disruption risks.

Vitro's Canadian supply chain is managed with a strong emphasis on compliance, transparency, and ethical responsibility. All suppliers are expected to adhere to Vitro's Supplier Code of Conduct, which includes explicit prohibitions against forced and child labour and requirements for human rights due diligence.

## Policies and due diligence processes

Vitro is committed to upholding internationally recognized human rights standards and ensuring full compliance with applicable laws in every jurisdiction where it operates. This commitment is central to the company's efforts to prevent and mitigate the risks of forced labour and child labour across its operations and supply chains.

To support this commitment, Vitro has implemented a comprehensive regulatory and ethical framework, anchored by the following core policies:

- **Code of Ethics**
- **Anti-Corruption and Anti-Money Laundering Policy**
- **Conflict of Interest Policy**
- **Human Rights Policy**
- **Equality and Equity Policy**
- **Responsible Procurement Policy**

Together, these policies form the foundation of Vitro's **Integrity Program**, which establishes clear, binding expectations for all employees and third parties acting on behalf of the company. The program promotes ethical conduct, transparency, and accountability in all business activities.

## Oversight

Vitro's governance structure ensures consistent adherence to its ethical principles across all regions:

- The **Corporate Ethics Committee** oversees the Integrity Program, coordinates regional efforts, and ensures alignment with corporate policies. Its responsibilities are defined in the Ethics Committee Charter.
- **Regional Ethics Committees** operate in Canada, the U.S., Europe, and Asia, adapting compliance efforts to local legal and cultural contexts. These committees include representatives from Human Resources, Legal, and Finance.
- The **Governance Steering Committee**, chaired by the Chief Financial Officer, provides oversight of governance initiatives, including those related to forced and child labour.
- The **Executive Committee** approves strategic actions and policies related to human rights and delegates implementation to Executive Directors.

### Whistleblower Mechanism

To reinforce a culture of integrity and transparency, Vitro provides a secure and anonymous reporting platform—the **ALERT! System**, managed by *EthicsGlobal*. This system allows employees and stakeholders to report concerns related to ethical conduct, including potential violations of the Integrity Program.

The *ALERT!* system is available 24/7 in multiple languages and ensures the confidentiality of all reports. Submissions are reviewed by the Internal Audit Department and the Corporate Ethics Committee, which determine the appropriate course of investigation and remediation.

### Anonymous Reporting Channels

- **Canada & USA:** 1-888-876-7548
- **Mexico:** 800-04-38422 / 55-6266-7171
- **Brazil:** 800-8923-392
- **Colombia:** 01-800-518-9191
- **Ecuador:** 1800-001-135
- **Panama:** 836-5888
- **Peru:** 705-2233
- **Internet:** <https://alert.ethicsglobal.com/>
- **Mobile App:** EthicsGlobal

### Whistleblower Activity – 2024

In 2024, a total of **67 reports** were submitted through the *ALERT!* System. The majority were related to labor and workplace matters. No reports were received regarding forced or child labour.

- **66 cases** were reviewed and resolved.
- **1 case** was recorded as part of a third-party audit test.

### Geographic Distribution of Reports

Country	Cases	%
Mexico	55	83%
United States of America	10	15%
Canada	1	2%
<b>Total</b>	<b>66</b>	<b>100%</b>

### Classification of Reports

Category	Cases	%
Human Resources	37	56%
Safety, Environment, Health, and Hygiene	13	20%
Operational Integrity	7	11%
Other	5	8%
Misappropriation or Misuse of Resources, Time, and Assets	4	6%
<b>Total</b>	<b>66</b>	<b>100%</b>

Most reports involved workplace issues such as harassment, nepotism, bullying, and discrimination. No administrative proceedings were initiated in 2024 that posed a significant risk to the company.

### Supplier Due Diligence

Vitro has implemented a structured due diligence framework to identify, assess, and manage risks related to forced and child labour in its supply chains and includes:

- **Supplier Code of Conduct.** All suppliers are required to adhere to Vitro’s Supplier Code of Conduct, which outlines ESG expectations, including the prohibition of forced and child labour.
- **Supplier Evaluations and Onboarding.** New suppliers undergo an assessment to ensure alignment with Vitro’s ethical and legal standards.
- **Ongoing Monitoring and Audits.** Supplier Evaluation is continuously monitoring direct suppliers through performance reviews to detect and address shortcomings or potential risks.
- **Whistleblower Mechanisms.** Suppliers and external stakeholders can also report suspected violations through the *ALERT!* System.
- **Cross-Functional Oversight.** The Procurement, Legal, Sustainability, and Internal Audit departments collaborate to enforce due diligence procedures and ensure consistent oversight.

Additionally, Vitro actively participates in international due diligence and traceability initiatives, such as the preparation of *Conflict Minerals Reports* and *Extended Minerals Reports* developed by the *Responsible Minerals Initiative*, which help trace the origin of high-risk minerals, including conflict minerals.

## Forced Labour and Child Labour risks

In alignment with the principles set forth by the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, Vitro conducted a comprehensive risk mapping exercise in 2024 to identify potential vulnerabilities related to child labour and forced labour, and to strengthen its due diligence mechanisms in accordance with international best practices.

This analysis focused on the evaluation of direct suppliers, assessing their exposure to labour practices that may conflict with Vitro’s standards. The assessment considered factors such as the industry in which each supplier operates, the goods and services they provide, and the geographic location of their main operations. The following sources were used as references:

- The 2024 list of goods produced by child labour or forced labour published by the *U.S. Department of Labor*,
- The *United Nations Global Compact* report “Addressing Child Labour in Business Operations and Supply Chains” (2020),
- And the “CSR Risk Check” tool (2024) by MVO Nederland, which helps identify ESG risks in international supply chains.

Based on this information, a heat map was developed to summarize the distribution of risks across Vitro’s supply chain. The analysis revealed that the sectors with the

highest potential risk are the electronics and metallurgical industries, particularly in Mexico, the United States, and Canada. This conclusion aligns with documented evidence highlighting precarious labour conditions in Mexico’s manufacturing and electronics sectors, vulnerabilities in Canada’s light manufacturing and food processing industries—especially in the context of temporary migrant labour—and risks in the U.S. electronics manufacturing sector, where concerns persist around subcontracting, traceability, and compliance with labour standards.

Of the suppliers evaluated, 10.5% were identified as having a potential risk of non-compliance related to child or forced labour, based on their industry and region of operation. This group of suppliers also represents 12.6% of Vitro’s total procurement value, underscoring the need to reinforce monitoring and due diligence mechanisms in these key industries and regions.

## Remediation Measures

In accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, the organization conducted a review of its operations and supply chains for the 2024 reporting period. This review was part of the company’s ongoing due diligence efforts to identify and address any risks related to forced or child labour.

During the reporting period, the organization did not identify any instances of forced labour or child labour within its operations or supply chains. As a result, no remediation measures were required or implemented in 2024.

## Remediation of Loss of Income

As no cases of forced or child labour were identified within the organization’s operations or supply chains during the reporting period, no corrective actions were taken that would have impacted the income of vulnerable individuals or families.

Accordingly, the organization determined that no loss of income occurred as a result of its efforts to prevent or eliminate risks related to forced or child labour, and therefore no remediation of income loss was necessary.

## Training

Vitro has implemented robust training and awareness programs as part of its commitment to preventing and addressing the risks of forced labour and child labour in its operations and



supply chains, in alignment with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

As part of its internal compliance framework, Human Resources personnel receive regular internal training on labour rights and applicable legal standards, including those related to the prohibition of child and forced labour. This training ensures that HR teams are equipped to uphold ethical employment practices and identify potential risks.

Vitro’s recruitment process is transparent, standardized, and consistently applied. All hiring personnel are trained to conduct formal interviews and verify the legal working age of all applicants—including interns—through official documentation. This verification process serves as a key control to prevent underage employment.

To further strengthen its due diligence efforts, Vitro has introduced a specialized human rights training program for employees involved in supplier evaluation and management. This program focuses on identifying, assessing, and mitigating risks of forced and child labour within the supply chain. It equips procurement teams with the tools and knowledge necessary to support ethical sourcing and responsible business conduct.

These training initiatives reflect Vitro’s ongoing commitment to fostering a culture of compliance, transparency, and respect for human rights across all levels of the organization and its supply chain.

### Employee Training on Integrity Program

To reinforce ethical awareness across the organization, Vitro delivers annual training to all employees on its **Integrity Program**, which includes the **Human Rights Policy** and **Responsible Procurement Policy**—both of which explicitly prohibit child labour, forced labour, and human trafficking.

In 2024, **92% of Vitro’s workforce** completed this training through a combination of e-learning via **Vitro University** and in-person sessions.

Position Type	Total Employees	Trained Employees	Training Coverage (%)
Executives	227	196	86%
Administrative Staff	3,142	2,831	90%
Operational Staff	11,089	10,316	93%
<b>Total</b>	<b>14,458</b>	<b>13,343</b>	<b>92%</b>

## Assessing Effectiveness

To evaluate the effectiveness of its measures to prevent and reduce the risk of forced labour and child labour, the organization has implemented a multi-layered approach that includes both internal and external mechanisms.

### Internal Monitoring and Evaluation

The organization conducts regular audits through its Human Resources department to verify adherence to company policies and procedures, including those related to labour rights and ethical employment practices. These audits help ensure that internal controls remain effective and aligned with legal and ethical standards.

The organization also administers an annual employee satisfaction survey, supplied by *Qualtrics*, which includes questions related to the work environment, training, development opportunities and other aspects related to employee satisfaction and engagement. This feedback mechanism provides valuable insights into the organizational culture and provides the opportunity to all employee to communicate their perception about labour practices and conditions.

### External Oversight and Accountability

The organization is subject to random audits by customers and government authorities across various jurisdictions. These audits assess compliance with labour, contractual, and ethical standards, providing an additional layer of external accountability.

The organization respects the right to freedom of association, and several of its facilities have established unions representing workers. Union representatives play an active role in reviewing and ensuring that all contractual obligations toward workers are fulfilled, further reinforcing compliance with labour standards.

### Supply Chain Effectiveness Measures

In its supply chain, the organization began in 2024 conducting self-assessments of supplier compliance with environmental, social, and governance (ESG) criteria outlined in its Supplier Code of Conduct. These assessments are used to monitor supplier practices and identify potential risks including those related to forced or child labour.

To enhance the effectiveness of the evaluation efforts of the supply chain, the organization is currently working to improve the evaluation of supplier compliance. This includes facilitating mechanisms for Tier 1 suppliers to request and collect similar compliance information from Tier 2 and lower-tier suppliers, thereby strengthening transparency and accountability throughout the supply chain.