



# VITRO CODE OF ETHICS AND CONDUCT

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# MESSAGE OF THE CEO

Dear Stakeholders:

Our actions throughout history have demonstrated Vitro's commitment to our Stakeholders. With this Code of Ethics, we seek that the actions of our Employees, customers and suppliers, comply with the principles, laws, and regulations of the countries where we operate and further positive actions focused towards the community, in our operations and within any new activities.

Through our ongoing efforts to promote sustainable development, we contribute to improving the lives of our Employees and the communities where we operate. At Vitro, we are committed to transparency and maintaining open communication with all those that share an interest in our Company.

With over 100 years of experience in the industry, at Vitro, we work each day to ensure that our actions and decisions are reflected and consistent with the performance of our functions in accordance with the highest principles of ethics.

We have the certainty that, working jointly with this objective, all the parties involved will assure the sustainability of our future.

Given the above considerations, Vitro's Board of Directors has approved and authorized the issuance of this Code of Ethics.

**Adrián Sada Cueva**  
CEO

# VITRO'S MISSION, VISION AND VALUES

Our mission, vision and values drive us to achieve innovation that overcomes challenges, improves operations, and generates sustained solutions, both for our customers and for our communities.



## Mission

We redefine the power of collaboration to generate value and innovative glass solutions for our customers and communities.



## Vision

Together we will discover the full potential of glass to improve how we move, build and live in the future.

# VITRO'S MISSION, VISION AND VALUES



## Values

Together, we see what is right. At Vitro, we measure success not only through economic value but also through the well being of people, our shareholders and business partners, and the people who use our products.

- **Customer Orientation:** Our customers are the backbone of everything we do.
- **Operating Excellence:** Always attain expectations with greater efficiency, reliability and quality.
- **Innovation:** Promote procedures and operations with new ideas to constantly improve our results.
- **Our People:** Join our talent to work and grow together as one.
- **Integrity:** Always act with honesty and per our principles.
- **Sustainability:** Create the conditions to operate and grow in harmony with the environment and the communities in which we serve.

# PURPOSE AND SCOPE OF OUR CODE OF ETHICS AND CONDUCT

The purpose of our **Code of Ethics** is to reaffirm Vitro's commitment to act in line with the highest ethical standards in establishing and maintaining an organizational culture of ethics that rules the relationships among Vitro, its Employees, shareholders, business partners, clients, suppliers, authorities, communities and others Stakeholders everywhere that Vitro has presence.

The Code of Ethics and **Conduct of Vitro** applies to all our Employees regardless its organizational level, including the members of the Board of Directors as well as to any person or entity that acts on behalf or representation of Vitro and to our suppliers.



# DEFINITIONS OF TERMS

- 1. Anonymous Complaint Hotline:** Mechanism for accusations based on a structured framework in order to answer to accusations of purported violations of the Code of Ethics by Shareholders, Advisors, Counselors, Employees, suppliers and customers of Vitro.
- 2. Board of Directors:** Board of Directors of Vitro, S.A.B. de C.V. and its subsidiaries.
- 3. CEO:** Chief executive officer and person in charge of the management, leadership, and performance of Vitro, S.A.B. de C.V. operations and all its subsidiaries, subject, for this, to the strategies, politics and guidelines approved by the Board of Directors.
- 4. Code of Ethics:** Vitro Code of Ethics and Conduct.
- 5. Company:** Vitro, S.A.B. de C.V. and all its subsidiaries, either direct or indirect. Indistinguishably, Vitro or Company.
- 6. Corporate Ethics Committee:** Central Committee in charge of reviewing and updating the Code of Ethics; it coordinates the efforts of the Regional Committees and is responsible for the regions of Mexico and Latin America. The Regulations of its Ethics Committees regulate its integration, functions, duties and obligations.
- 7. Employees:** The physical persons that occupy a position, job or commission at Vitro or its subsidiaries, including the CEO, Executive Committee, the Board of Directors and the attorneys in fact who execute operations on behalf of the Company with the public.
- 8. Executive Committee:** Committee led by the CEO of Vitro and composed by the executives that report directly that person.
- 9. Members:** Members of the Board of Directors of Vitro, S.A.B. de C.V. and the board of directors of its subsidiaries.
- 10. Mexico:** United States of Mexico.

- 11. Money Laundering:** Money laundering (also known as corruption, laundering of capital, laundering of assets, or operations with resources from unlawful activities) it is an activity that consists of making funds or assets obtained through unlawful activities appear as the result of legal activities and circulate in the financial system without problems.
- 12. Regional Committees:** Committees in charge of following up on the Code of Ethics in the regions of Mexico and Latin America, the United States of America and Canada as well as Europe and Asia. Their composition, functions, duties and obligations are regulated by the Ethics Committee Regulations.
- 13. Regulations of the Ethics Committee:** Set of provisions issued by the General Executive Committee and approved by the Board of Directors, which establish the composition, operation, duties and obligations of the Corporate Ethics Committee and the Regional Committees.
- 14. Stakeholders:** All such groups that are directly or indirectly affected by the development of Vitro and its subsidiaries' entrepreneurial activities, and therefore they also can directly or indirectly affect their development.
- 15. Vitro:** Vitro, S.A.B. de C.V. and all its direct or indirect subsidiaries.
- 16. Vitro Privacy Notice:** Notice displayed on the web portal <https://vitro.com/en/privacy-policy.aspx>



## VITRO'S COMMITMENTS TO OUR STAKEHOLDERS



# VITRO'S COMMITMENTS TO OUR STAKEHOLDERS

## 1. Vitro's People and Human Rights

At Vitro, our people are the Company's engine. We are committed to providing an adequate and secure work environment for all our Employees. Furthermore, we promote the comprehensive development, wellbeing and growth of all those that comprise a part of the Company.

**1.1. Respect for Human Rights.** At Vitro, we are committed to respecting and ensuring others respect human rights at each of our operations and we recognize their importance, as well as their universal nature. We comply with the laws of the countries where we operate and have a presence; we are coherent with the international legal framework on the subject and we know that human rights are inherent, inalienable, universal, indivisible and interdependent.

**1.1.1. Non-discrimination and Labor Inclusion.** Discrimination is the type of distinction, exclusion or preference that has the effect of annulling the equality of treatment or opportunities, when this consideration is based on prejudice, and not on lawful reasons. At Vitro, it is forbidden to discriminate in the treatment of employees, for reasons of race, color, gender, age, language, property, nationality or country of origin, religion, ethnic group, disability, pregnancy, political affiliation or opinions, sexual preference or any prejudice that can be a reason for discrimination.

At Vitro, we are committed to offering equal opportunities, training and professional development to our Employees, based solely on merit; we comply with the legislation on liberty of association, privacy, collective negotiation, immigration, labor shifts, salaries and schedule; as well as the laws that forbid forced and mandatory labor, child labor, trafficking of persons and job discrimination.

**1.1.2. Workplace Free from Harassment.** Harassment is verbal, non-verbal or physical conduct, undesired and offensive, that generates an environment of hostility or intimidation towards a person for reasons of sex, sexual orientation, identity and/or expression of gender, race, age, nationality, religion, or another legally protected condition. At Vitro, harassment is forbidden in any operation. Vitro promotes the use of channels of communication of the Company to further creating a harassment free environment. Those who comprise a part of Vitro have a responsibility to prevent and report harassment if it is committed. We are committed to having a healthy work environment, one free from intimidation and harassment of any type.

**1.1.3. Incorporation of Employees.** Vitro promotes the recruiting, hiring, growing and development of its Employees based only on their work experience, abilities for the position and respect for our values. We support a diverse and inclusive work environment, with open communication and adequate channels for effective feedback. Furthermore, we comply with applicable labor laws, including the payment of salaries and benefits, and we have implemented the necessary controls to avoid, always forced or child labor.

**1.2. Vitro's Commitments to its People.** As part of the Company, we have commitments to comply with and to lead their compliance.

**1.2.1. Employee Relationships.** All of us must comply and cause to comply what is established in the present Code of Ethics, as well as all the policies and laws applicable to Vitro, by:

- Encouraging positive leadership and teamwork.
- Promoting an accurate work environment.
- Promoting open and transparent communication.
- Respecting cultural differences or differences of opinions.
- Complying with our commitments in a consistent, honest and responsible manner.
- Being responsible for our formation and development, seeking, always, to take advantage of the development opportunities provided by Vitro.
- Promoting Vitro's image within and outside its facilities, by setting a good example.
- Reporting any possible violation of the present Code of Ethics through the authorized channels to do so.

**1.2.2. Industrial Safety and Health at the Workplace.** For Vitro, the prevention of accidents and safeguarding the safety and health of its Employees, and surrounding communities is our highest priority as well as promoting the well-being of all those that are at our facilities. We seek always to perform our activities in a safe and efficient manner.

Vitro is committed to ensuring that the design, manufacturing, selling and distribution of products, as well as the provision of our services, are performed in a responsible manner, to protect Employees, customers, the public and minimizing the environmental impact.

Vitro's health and safety is the responsibility of us all; thus, we commit to:

- Establish that safety and health is considered a priority in all our operations.
- Being responsible for our actions within and outside of the facilities and not putting third parties at risk.
- Reporting any risk detected or risky conduct.
- Never giving priority to the operation over security and reporting to those that pressure us to act in the opposite way. All Employees, customers, suppliers and contractors must abstain from performing, and ceasing to perform any activity that could be considered risky.
- Supervisors are responsible for performing activities under the safety and health standards established for each activity.
- Never presenting ourselves to work in a drunken state or after consuming narcotics. Entry to the facilities in this condition is strictly prohibited. We have a zero-tolerance policy. This prohibition also applies to any third party seeking to enter our facilities.
- Providing the training, equipment and maintenance necessary for the health and safety of our Employees. Vitro provides the protective equipment that is necessary to perform each activity, as well as training for its adequate use. Employees have an obligation to use this protective equipment correctly. These measures apply in turn to contractors and/or any third-party visitor that enter our facilities or comprise a part of our operations.
- Identify possible risks in our daily operations and report them to the areas in charge of mitigating them.

Vitro expects that all Employees, contractors, suppliers, and visitors in general comply with all the environmental, health and safety laws applicable in the countries that Vitro has operations, as well as with Company policies, practices, systems and procedures.



## 2. Customers and Commercial Relationships

To assure that we are the best option for our customers, at Vitro we build our relationships with professionalism and integrity and under the highest ethical standards, meanwhile providing quality services and products, in a timely manner and at the agreed place. In Vitro we seek to overcome our customers' expectations, anticipate their needs, be innovative and thereby, ensure a lasting relationship and one of trust.

**2.1. Fair Treatment and Non-Discrimination in the Selection of Customers and Markets.** At Vitro, we are committed to:

- Assure equal treatment and non-discrimination towards our customers, commercial partners or markets in which we operate.
- Treating our customers and commercial partners in a fair, respectful, and transparent manner.
- Performing our negotiations with respect towards our customers and commercial partners, including respect for local traditions (uses and customs) where we operate.
- Ensuring the confidentiality and protection of our customers' personal data in our possession, to avoid a leak or improper use thereof by third parties.

**2.2. Advertising, Sales Arguments, and Respect for Agreements.** At Vitro, we are committed to:

- Ensuring that sales promotions and arguments that we use are free from false information with respect to availability, date of delivery or quality of our products, as well as terms of sales, including payment.
- Offering our products and services in an honest and accurate manner. Using deceitful or dishonest practices is strictly forbidden.
- Committing our negotiations only to what we can comply. If, for reasons beyond our control, it is impossible to comply with the above-mentioned matter, we must immediately inform our supervisor and customer.
- Do not use offensive or discriminatory advertising or presenting false information in our advertising practices.

**2.3. Respect for our Code of Ethics.** Our customers and commercial partners must know our Code of Ethics. At Vitro, we are committed to performing our negotiations and contracts with honesty and accuracy and we hope that the relationship is reciprocal. We have an obligation to report conduct that does not comply with ethical standards or applicable laws in the countries where we operate.

### 3. Suppliers and Commercial Relations

At Vitro, our suppliers are a key part for our Company's growth. Our relationships with our suppliers are based on mutual benefit and long-term commercial relations of trust.

**3.1. Fair Treatment and Non-Discrimination.** At Vitro, we are committed to:

- Managing commercial relationships, agreements and contracts with our suppliers in an honest and transparent manner, offering equal opportunities for all the parties to submit proposals and obtain contracts.
- Ensuring that our procurement process is consistent, respectful and confidential, without granting benefits in favor of any of the applicants.
- Ensuring that the contracts are granted solely based on capacity, competitive price, quality, experience and service.
- Seeking to transfer good practices to our supply chain.
- Ensuring in our procurement criteria is considered, among others, those that clearly reveal that our suppliers meet the legal requirements to operate their businesses, adhere to our Code of Ethics and fulfill with social responsibility standards and sustainability.
- Definitively prohibiting purchasing and supplying minerals coming from conflict areas.

**3.2. Respect for Contract Terms, Licenses, Laws and Regulations.** At the Company, we are committed to:

- Respecting agreements and commitments established in our commercial agreements and contracts with suppliers. If we cannot respect this, the supervisor must be notified immediately.
- Respecting intellectual and industrial property rights. Vitro's Employees cannot establish commercial relationships with contractors or suppliers that do not demonstrate that they are duly authorized for the use or sale of products and services subject to payment of royalties or intellectual or industrial property rights to third parties, as well as their authenticity and legality.
- Complying correctly with our payment commitments to suppliers and within the previously agreed time.
- Ensuring our suppliers fulfill with the applicable laws to the activities or services rendered.

**3.3. Respect for our Code of Ethics.** Our suppliers and business partners must know, sign and adhere to our Code of Ethics and sign it. At Vitro, we are committed to leading our negotiations and contracts with honesty and accuracy; and we hope the relationship will be reciprocal. We have an obligation to report conduct that does not comply with ethical standards or with the applicable laws where we operate.

## 4. Neighboring Communities

We are part of the communities where we operate and by this, we create relationships of trust, collaboration and support that allow the growing and sustainable development. At Vitro, we seek open communication and dialogue to serve the expectations that these communities may have with our operation.

**4.1. Respect for the Communities where We Operate.** Given that we are part of the communities of various countries, we respect local traditions and avoid our operation from being harmful or disturbing them. Through open communication, we can serve their expectations and seek mutual benefits.

**4.2. Vitro's Responsibility to Drive Local Communities.** We seek the development of the places where we operate. As a community member, we are conscious of the beneficial impact that we can have in improving the quality of life of the residents of the communities in which we operate. Either through specific community programs, donation or volunteering, our participation must always be subject to Vitro's internal policies and will follow the below guidelines:

- Define the support in the outside community in relation to education, health, and social development.
- Guarantee that the organizations with which alliances have been made lead the support that is lawfully established.
- Determine programs, actions or sponsorships approved or supported by local authorities, provided that the law of the country at issue does not prohibit.
- Not assuming the fundamental obligations and responsibilities of the governmental entities or other companies.
- Not generating dependency towards Vitro's support.
- Reflect itself in the accounting records, according to the applicable law in each country and Vitro's policies.

**4.3. Boosting to Local Economies.** To the extent possible, as a contribution to the development and benefit to the communities, countries and regions where we operate, we seek the procurement of local personnel and the development of suppliers of goods and/or services that are also local. This procurement will depend on Vitro's specific needs, for Employees or suppliers.

## 5. Government, Authorities and Responsible Political Participation

To Vitro, following the highest ethical and legal standards is of utmost importance with respect to the governments in the countries where it operates. Our relationship is based on the compliance with national and international legal provisions always.

**5.1. Government as Regulator.** Vitro and all its Employees will comply with the applicable laws in each one of the countries where we operate and have a presence. The principle of legality must govern our conduct and actions of the Company. Vitro's Employees cannot, for any reason, commit an unlawful act, nor induce or influence a third party to commit one.

If there is any doubt regarding applicable laws, please contact Vitro's legal department.

**5.2. Government as Supplier.** In such cases where the government acts as Vitro's supplier, the same rules and procurement processes must be followed as with the rest of the suppliers.

**5.3. Interaction with Government Officials.** When contact is established with governmental entities, Employees must ensure that said contact is within the attributions of its position. If the party does not understand the above point, contact the legal department of your Company.

**5.4. Political Participation and Contribution anticipation and political contributions.** In principle, Vitro does not participate in the political area of the countries where it operates. If the Company participates in the political climate, it will be in a limited manner and per applicable laws. Even so, we recognize and respect our Employees rights to participate in political activities. In these cases, such activities must be legal and not interfere with the duties and responsibilities contracted with the Company, nor can they compromise it.

During the exercise of any political activity, the Employee(s) that participate in said process, may only involve Vitro when express authorization exists, granted by the Executive Committee. Similarly, the performance of political activities at the Company's facilities or the use of its resources for such ends, will only be permitted with the express authorization of the Executive Committee granted in advance thereof.

The Company will not make itself responsible, in any case, of the actions of its Employees in the performance of their political activities; even so, we assure that the Employees shall not be affected by their personal political ideas nor their election to make personal political contributions.

It is important to note that, in some countries and state or local jurisdiction, contributing to campaigns of officers on behalf of a company may be forbidden, as in the case of Mexico. In certain cases, making political contributions may be absolutely forbidden.

Prior to making political contributions, Employees should always consult Vitro's legal department.



## 6. The Environment

Caring for the environment is one of the pillars of our sustainable development model. We are responsible for our environmental impacts and we seek to avoid them. We seek the continuous improvement and innovation in our processes, making them increasingly more efficient and clean.

**6.1. Vitro's Commitment to Caring for the Environment.** At Vitro, we are committed to complying with the environmental regulations in each of our operations, as well as continuing, based on our environmental management system, to prevent, minimize and compensate such impacts that we have on the environment.

Similarly, we are committed to carrying out the actions that are necessary for the success of the environmental management system and to cooperate with governments and environmental organizations to improve our performance on the subject.

**6.2. Environmental Responsibilities of Vitro Employees.** The Employees must respect the environmental laws of each country and promote the proper use of natural resources at our disposal.

Furthermore, we must report to the respective areas, when potential risks for the environment and human health.





**VITRO'S COMMITMENTS  
IN ITS OPERATIONS**

# VITRO'S COMMITMENTS IN ITS OPERATIONS

## 1. Anti-bribery and Prevention of Money Laundering

**1.1. Prohibition and Zero-Tolerance to Bribery.** At Vitro, we have a zero- tolerance to bribery and this extends to all officers, agents, employees and consultants with which Vitro does business. Bribery includes any activity that implies an undue advantage, benefit, or special treatment for the Company on the part of a third party, such as: Paying a person or entity to obtain business, facilitating something of value to a person or entity in exchange for a permit, license, certification or other personal or commercial advantage.

Bribery can materialize through any object of value, such as money in cash, gifts, meals, leisure, offers of employment, among others.

Performing or participating in bribery may have legal consequences in the countries where we operate and we perform business both for Vitro as well as for the Employee involved therewith. The legal anti-bribery provisions of certain countries still apply when the corruption or bribery act has been carried out in another jurisdiction.

**1.2. Gifts and any Attention to Government Officials.** Gifts and attentions to offer to a government officer must comply with applicable national laws, as well as being commercially acceptable and they must never influence commercial decisions.





This Code of Ethics, as well as the applicable laws and regulations applicable to Vitro, forbid making or offering bribes, payments or any object of value or personal benefit to a public official or government employee to obtain or maintain a business or to achieve any undue advantage.

For any doubt about the subject, please contact Vitro's legal department.

**1.3. Management, Lobbying, Consultants and Third-Party Representatives.** Encouraging or instructing any third party to commit bribery acts in favor of Vitro is forbidden. Third parties hired by Vitro should know the present Code of Ethics and sign it as part of its service contract, to be consistent with this Company's anti-bribery practices.

Furthermore, Employees must always review that the payment requested with the third party is consistent with the performed service.

**1.4. Prevention of Money Laundering in Our Operations.** We must comply with the Anti-Money Laundering acts in each of the places in which Vitro has a presence. As Employees of Vitro, we must be attentive to the signs of possible Money Laundering by third parties and ensure that Vitro in no case facilitates or contributes in any manner to performing terrorist or criminal activities.

If you have any doubt regarding any Money Laundering practice, you should contact the legal area or report it through the Anonymous Complaint Hotline (Alert) implemented by Vitro.

## 2. Compliance with Antitrust Laws

Vitro's relationship to our competitors must always be based on mutual respect and transparency.

Vitro strictly adheres to the principles and antimonopoly laws and in matters of free commerce and competition. Therefore, executing agreements to set prices, division or allocations of markets, predatory price practices, as well as any other unlawful market practice.

**2.1. Relationship with Our Competitors.** Always based on the principle of legality, all Vitro's Employees commit to:

- Full compliance with anti-monopoly laws and encouragement of free competition.
- Not allowing, under any circumstances, agreements with competitors that unlawfully restrict free trade, such as agreements to set prices, market allocation, and fraudulent tender manipulation. Agreements to set practices are understood as any arrangement or understanding between the competitor with respect to the price or any element of a price that will be paid or will be charged by third parties. Furthermore, the allocation of prices may include any arrangement between competitors that seeks to stabilize or eliminate prices of the competition regarding the sales conditions, transportation expenses, credit conditions, delivery terms, or inventory of reserves.
- Avoid the communications, transfer or exchange of direct or indirect information with the competition, which implies or suggests any form of unlawful agreement.

Employees cannot obtain confidential information from their competitors, through unlawful means, that violate or legally compromise the Company.

In all countries where Vitro operates and has a presence, the transgression of laws governing free competition has serious legal consequences to Vitro and its Employees, personally, that span considerable fines and penalties, jail sentences, and impact on its reputation.

Vitro's legal area should be consulted prior to preparing or signing agreements and contracts or in the event actions are performed that could violate antimonopoly and free competition regulations, or prior to participating in a new program that implies sending Company statistics or other forms of commercial association.

**2.2. Customers and Suppliers.** We must seek to treat all customers and suppliers in a fair manner, in compliance with all applicable free competition laws, without taking improper advantages or our market position.

**2.3. Possible Dominant Position in a Market.** In the event of having a dominant position in the market of a certain country or region, we must ensure that we are taking the necessary precautions to avoid monopolistic practices and harm possible competitors or consumers.



### 3. Compliance with National and International Operating Practices

Vitro is responsible for complying with the laws and regulations of each one of the countries in which it has a presence.

Vitro and its Employees must always be attentive to the laws that apply to us by functional and country area, because ignorance thereof does not exempt us from compliance. Each functional area must have the necessary process to be at the cutting edge of knowledge and compliance with said laws and their amendments, as well as Vitro's policies in each one of these subjects.

By way of illustration, but not limitation, Vitro and its Employees must be updated in the legal provisions about:

- Use of minerals in areas or countries in conflict of our supply chain.
- Imports and exports.
- Safety, health and environment.
- Protection of personal data.
- Protection of labor and human rights.
- Anti-bribery and anti-money laundering.
- Antimonopolies and free competition.
- Efficient use of energy.
- Political participation of companies.

If the Employee has any doubt or needs information about the application of any legal provisions, they should communicate with Vitro's legal department.

## 4. Conflicts of Interest

Vitro Employees may be exposed to possible conflicts of interest in their day-to-day work. All of us at Vitro have the obligation to act with honesty and ethics, always seeking to protect the Company's interests and not based on personal benefits.

A conflict of interest is any activity, investment, association or relationship (including familial relationships, friendships or business friendships) that can represent an absence of independence for decision-making in the day-to-day work at the Company.

The customer and supplier services departments must be especially careful to commit or not commit through gifts and special attention.

**4.1. Employees as Customers, Suppliers or Directly Reporting to Another Relative.** To prevent conflicts of interest in these situations:

- Employees must not take personal advantage of Vitro's business opportunities.
- Employees should not have direct family members under their direct reporting. In the event this is the case, one of the two should be transferred to another area of the Company, with the coordination and authorization of the human resources department.
- The family members of Employees and/or shareholders of our Company can work for it provided they comply with the requirements for the position. Their recruitment must be made following the selection procedure established by the human resources departments.
- Employees must abstain from hiring family members as suppliers for their department, or influencing in their procurement through other departments.
- Employees must notify their direct supervisor if a supplier is a close friend, so that this does not influence the procurement decision thereof.
- Employees must not share commercial information that may benefit a commercial transaction with family members or close friends.
- Employees must not, under any circumstance, use the name of Vitro, as well as its assets, facilities or resources, for personal benefit.
- Employees may acquire our products for their own consumption, if it is in accordance with the policy established thereto.
- Employees are forbidden from having businesses dedicated to sales, distribution, transportation or transformation of our products or services.
- Acting as a supplier, while being an Employee of any Vitro business area is forbidden.

**4.2. Employees with External Interests or Businesses that May Represent a Conflict of Interest.** We respect our Employees' right to perform business outside the Company, provided said business does not represent competition for Vitro or does not interfere with the daily activity of the Employee. Additionally, Vitro's information should not be used to interfere with the Employee's daily activities. Furthermore, Vitro's information must not be used for the benefit of external business.

Employees should not provide consultancies or services of any type to Vitro's competition or customers. If said business or activity represents a possible conflict of interest for the Employee, this business must be reported to the Employee's immediate supervisor and the Corporate Ethics Committee or the Regional Committee as applicable.

**4.3. Shareholders as Customers and/or Suppliers.** If a shareholder attempts to establish a commercial relationship with Vitro, it should be subject to the same procedures and conditions as the rest of our suppliers and customers.

**4.4. Reporting, Doubts and Management of Possible Conflicts of Interest.** Employees cannot at any time compete directly or indirectly against Vitro.

Given any doubt about a possible conflict of interest with Employees, the Employees must communicate it in advance to the Corporate Ethics Committee or the Regional Ethics Committee, corresponding to its country or asset, to Vitro's legal department.



## 5. Gifts, Attentions, Donations, Sponsorships and Other Courtesies

The Employees' decision-making could be comprised by gifts, courtesies, attentions, sponsorships, entertainment and other gifts. These gifts or entertainment, whether the Employees offer them or receive them, cannot influence in the Company's commercial decisions. No gift or entertainment may be offered that is contrary to the law or the Company's policies.

Under no circumstance can Employees accept or offer courtesies of any kind that compromise or give the appearance of doing so. Furthermore, conditioning or seeking to condition negotiations or employment in exchange for any gift, attention, courtesy or entertainment is prohibited.

### 5.1. Accepting Gifts, Courtesies, Attentions, Entertainment, Sponsorships and Others.

Vitro's Collaborators:

- Can only accept such gifts, courtesies, attentions, entertainment, sponsorships or any other type of gifts that are commercially acceptable and do not compromise the way Vitro relates with a third party, nor violates applicable laws.
- Must take special care in not appearing as a possible bribery with the acceptance of a gift, attention, entertainment or courtesy.
- Cannot demand the gifts, attentions or courtesies, or conditioning a business to the delivery thereof.
- Cannot, under any circumstance, receive cash.
- Cannot provide false expectations of possible benefits or businesses to third parties in accepting a gift, attention or courtesy.

**5.2. Granting Gifts, Courtesies, Attentions, Sponsorships, and Others.** We can only offer attentions, gifts and courtesies that are commercially acceptable and that do not compromise the way we relate to a third party, nor do they violate applicable laws.

- Each one of said objects or attentions must be reflected in the Company accounting records. Cash must never be provided.
- Notice must be given thereof to the immediate supervisor for its authorization.

In case of any doubt, or a possible extortion or bribery by a third party, it should be reported to the Anonymous Complaint Hotline (Alert) or with its respective Corporate Ethics Committee or Regional Committee.



## 6. Confidential and/or Privileged Information, Financial Controls and Records

We understand that confidential information may include, but not limited to any information not officially published regarding Vitro, its subsidiaries and affiliates, its executives and Stakeholders, operations, activities, plans, investments and strategies must be protected. Furthermore, we are responsible for timely communicating actual and complete information in all aspects, regarding the financial condition and results of our operations.

**6.1.** Regarding the Management of Confidential and/or Privileged Information and the Property of the Information. Vitro Employees have the duty to safeguard the confidentiality and the property of Vitro's information, and the information of its customers and suppliers. Employees are strictly forbidden from using this information for their personal benefits, their family members or third parties, assuming the responsibilities for the consequences of their unauthorized disclosure.

It is strictly forbidden to discuss confidential information in public places, family circles, third parties, and even with work colleagues that have no direct relationship to said information. This obligation shall continue when Employees or suppliers cease to work for Vitro.

Advisors and Employees that communicate non-public, privileged or confidential information to third parties or work colleagues, without authorization, who subsequently disclose this information, causing or potentially being able to cause harm to Vitro's interests, shall be subject to internal penalties. Furthermore, those involved in the unauthorized disclosure shall be subject to procedures that can result from civil or criminal penalties or both for violations of the laws of the countries where Vitro has a presence.

The information with property rights reserved in favor of Vitro, to which the Employees or suppliers have access, must not be copied, without the express authorization of the responsible department for its generation and custody.



Employees must assure that external personnel with access to this information comply with this guideline, establishing the measures of control that preserve Vitro's interest and guarantee redress for the harm caused by a violation of this provision.

Confidential or privileged information is considered, for purposes of description and not as limitation: the information considered for Vitro as confidential, our Employees' personal data, accounting and financial information, projects of organizational changes and mergers or acquisitions, transactions with securities, intellectual and industrial property, customer and supplier data, technical, technological administrative, financial, and commercial information, and the opening of new markets, among others, an any information whose distribution would put the Employees at risk , Vitro's operations or that could have an impact on the publicly issued Company securities.

It is important to keep in mind that:

- The unauthorized use or distribution of confidential or privileged information violates this Code of Ethics and may bring legal consequences.
- We must not use Vitro's confidential information for personal benefit. The improper use of confidential or privileged information may bring civil or criminal consequences.
- We cannot disclose or communicate confidential or privileged information to third parties, except as required by authorities for business or legal reasons and its disclosure is authorized.
- The use of confidential or privileged information to perform transactions in the stock market or sharing such information with any unauthorized person, including relatives or friends, is unlawful.
- We must not disclose confidential information about the companies in which we have worked previously nor share Vitro's information if we cease to work at the Company.
- When working with third parties and there is a need to share confidential information with them, the areas should ensure that the third party signs a letter of confidentiality to protect the information. This is especially important when working with consultants, managers and suppliers in general.

Protecting confidential or privileged information is the obligation of Vitro's shareholders, advisors, Employees and suppliers. Only the finance, legal, investor relations, institutional relations and communication areas, and those authorized by the Executive Committee are authorized to disclose relevant financial information to necessary public parties.

If you have any doubt about the confidential nature of information that you hold, please consult your Ethics Committee or Vitro's legal area.

**6.2.** Regarding Financial Controls and Records. Proper management, registration and protection of the controls and financial records under our care are essential for the correct management of the Company. The above reflects Vitro's reputation and credibility and ensures its compliance with its legal obligations.

It is important to consider:

- Vitro has established financial procedures and controls that must be used by all Employees and knowing them is the responsibility of the employer.
- All financial transactions must be recorded in the Company's accounting records and they must be available for internal and independent audit processes, as required.
- Accounting ledgers must be exact, reliable and accurate. They must be reported to the members of the Board of Directors and its audit committee, as provided by the pertinent laws of each country. The accounting information cannot, under any circumstance, be altered, hidden, deceitful or false.
- Payments issued by the Company must comply with the fiscal requirements established in each country.
- Vitro's Employees must guarantee, in the scope of their responsibility, that the financial records reflect reality, that the controls are effective, that reports and documents subject to review by stock market authorities and any communication is made public in a timely manner and includes actual, accurate and complete information.
- Transactions that imply an accounting registration must be supported by the respective underlying documents, must comply with fiscal requirements and be exact.
- Financial information can only be disclosed per the applicable law and guidelines set forth in Vitro's policy for confidential and/or privileged information, issued for such purpose. It is prohibited to modify or forge documents, records and reports, as well as hide information that can alter financial records and affects or may affect Vitro.

Any concern regarding to accounting matters, internal controls, financial or audit records must be directly reported to the Board of Directors' audit committee, through the internal audit area, or through the Anonymous Complaint Line (Alert) implemented by Vitro.

## 7. Protection of Personal Information

**7.1. Classification and Management of Information.** As part of our record of customers, suppliers, business partners, Employees, financial institutions, debtors, creditors, marketing activities and corporate communication, we may collect and handle certain personal identification information. Among said information, the following may be included for purposes of illustration, and not limitation:

- a. Identification Information:** complete name, address, private telephone, email, cellphone and/or work telephone, civil status, signature, electronic signature, record of contributors, identification number of persons, voting records, place and date of birth, nationality, names of family members, dependents and beneficiaries, and medical information.
- b. Professional Information:** occupation, position, area or department, domicile, telephone and work email, extracurricular activities, employment references, academic background, history of performance at the company, among others.
- c. Property Information:** bonds, salary withdrawals at the source, real estate property and personal property, credit score background, income and expenses, banking accounts, insurances funds for retirements, procured services, personal references, among others.

Therefore, Vitro will be able to collect and process sensitive personal data such as those that can reveal aspects related to the present and future health status, union membership, political position and credit background. Vitro is committed to treating this information with strict security measures, always guaranteeing their confidentiality and in accordance with Vitro's Privacy Notice for Information Management. Personal Data may be collected in various manners: directly provided by the user, through visits to our web portal or using online service and by obtaining information of other sources that are permitted by law.

Personal data collected may be used for the following purposes related to our commercial relationship:

- Sell the products and services offered by Vitro.
- Processing and administration of returns, invoicing, purchasing history of the customer, payments, discounts, notices of promotions, presales, and access to the customer and supplier profile.

- Monitor any telephone call to you.
- Update Vitro's records and system programs.
- Using them in the event of mergers, splits or acquisitions performed by Vitro and/or its subsidiaries.
- Comply with the requirements of the authorities, when necessary to safeguard the public interest and achieving or administrating justice.
- As applicable, the preparation and execution of purchase-sale agreements, consignment, distribution, supply of products or services, among others, as applicable to customer needs.
- Compliance with obligations that arise from the legal relationship established with the customer.
- Provide the services and products required by the customer in a timely and correct manner.
- Make inquiries, investigations and revisions with respect to complaints or claims.
- Contact it for any matter related to Company products and services or Vitro's Privacy Notice.

**7.2.** Procedure to Exercise the Right to Access, Rectify, Cancel, and Eliminate Data, and its Equivalent in the Countries where We have Operations. Users of Vitro's portal and/or its subsidiaries have been recognized and may exercise "ARCO" rights (Access, Rectify, Cancel and Opposition) and/or its subsidiaries have been recognized (the rights to use ARCO), as well as those that apply, according to the laws of each country where we have operations, by directly sending a request to the party responsible for this process at Vitro, through the email account that will be provided in Vitro's Privacy Notice.

Said request must include: name and domicile or other means of communication to obtain an answer to the query; the documents that certify the identity or, as applicable,



the legal representation; the clear and accurate description of personal data regarding that which can be exercised by any ARCO right or its equivalent in the countries where we have operations and any other element that enables locating personal data.

In any moment, the interested party may revoke the consent they have granted to treat their personal data, so that we limit or cease using or disclosing them.

Similarly, the interested party may limit the use or disclosure of their personal data. To do so, it is necessary that they submit their petition to the email address specified in Vitro's Privacy Notice.

**7.3.** Procedure for Transfers of Personal Information to Other Group Companies or Third Parties Foreign to It. Personal data shall never be disclosed nor shared with third parties, nor will they be given a use different from the above section, unless there is a change in Vitro's Privacy Notice.

Nevertheless, it is possible that Vitro contract an outside third party to manage and administrate the web portal where such Privacy Notice is located, that supports understanding how visitors use it. Even when this third party can collect information regarding the titleholders on behalf of Vitro, the Company controls the use of such information.

Vitro does not market, sell or lease personal information of the titleholders to third parties. Notwithstanding the above, the warning is made that Vitro may use "cookies" to confirm its identification, personalize the access to the web portal and review its use, with the sole purpose to improve the user's navigation and its functional conditions, when the cited "cookies" do not collect the user's personal data in legal terms. The portal has links to other external sites, of which the content and privacy policies are neither Vitro's responsibility nor its subsidiaries.



**7.4. Procedure to Inform the Authorities of Any Violation of Information.** Vitro commits to monitoring, identifying and reporting any violation of personal data of the titleholders to which it has access, within the 72 hours following the occurrence of said violation.

Furthermore, it is important to clarify that the laws and regulations of various countries can impose different requirements (which may even conflict each other) on the internet and the protection of information.

Because Vitro's corporate offices are in Mexico, Mexican laws govern all the matters with respect to its web portal. If the titleholder is in any other country outside of Mexico and contacts us, they should consider that any information provided shall be transferred to Mexico and, when entering their information, they authorize this transference and accepts the conditions provided in Vitro's Privacy Notice.

## **8. Protection and Correct Use of Assets**

Our commitment to the proper use of the Company's assets must be permanent. Vitro commits to providing what is necessary so that the Employee's work can be performed in a secure and efficient manner that drives their wellbeing, and it is the responsibility of the Employees' to make a correct use of the Company's assets.

It is important to consider that:

- The Company's assets may be tangible and intangible and include money, properties, facilities, products, machinery, equipment and communication systems, the product of work, intellectual property, computing system data and non-public information.
- The assets must only be used for performance within the Company and never for personal benefit. The assets must not be used to perform activities foreign to Vitro.
- We have the responsibility of using the assets in a responsible manner, as well as the custody and safeguard of assets that are under our control.
- Participating, influencing or permitting situations or actions that are linked to theft, improper use, loan, waste or sale of assets in an unauthorized manner are prohibited.



**ADMINISTRATION OF VITRO'S  
CODE OF ETHICS AND CONDUCT**



# ADMINISTRATION OF VITRO'S CODE OF ETHICS AND CONDUCT

## 1. Administration

To follow up on ethical matters, we have established committees to answer doubts and reports.

The Corporate Ethics Committee coordinates and oversees various Regional Committees and addresses reports from Latin America, as well as the matters that are not covered by this Code of Ethics that apply in all the regions, independently of their location in the terms of the company's Regulations.

Because each region has specificities, ethical committees must be created to address them. In Latin America, three Regional Committees, address the specificities of the regions.

The committees are formed by at least five members, representative of the diverse functional areas. In addition, legal and finance areas are always represented. The committee members must be trained and adhere their conduct to the ethical values established in this Code of Ethics, regardless of their position in the organization.

Committees may ask for support from the Corporate Ethics Committee areas, to perform investigations of the matters. Their confidentiality must be cared for always.

The competition and capacity to resolve the matters submitted to a Regional Committee is determined by the Regulations of the Ethics Committees.



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## 2. Complaint Channels

When we find ourselves in situations where it is necessary to ask for advice about an ethical situation or report a violation of the Code of Ethics, the following communication and/or good faith complaint channels may be reached:

- Corporate Ethics Committee for Mexico and Latin America (ethicslatam@vitro.com).
- Regional Ethics Committee for Europe and Asia (ethicseuropeasia@vitro.com) and for the United States of America and Canada (ethicsusacanada@vitro.com).
- Anonymous Complaint Phone Line (ALERT):
  - In Mexico: 01 800 288 2872
  - In Colombia: 01 800 911 0011
  - In the United States: 877 780 9370

When listening to the operator's recording, dial any of the telephones of the Anonymous Complaint System: 877 780 9370 and 877 532 5823

For other countries, consult: <https://watcher.alertline.com>

## 3. Process for Following-Up with Cases

Each one of the reports will follow the following procedure:

- The respective committee receives the report through one of the available channels and defines, whether the ethical subject applies.
- In the event of applying as an ethical subject, the committee revises the report and an investigation is initiated, and one of the members will be its leader.
- Once the results of the investigation are obtained, and if there is a violation of the Code of Ethics, the consequence shall be defined.

The consequences shall be proportional to the violation and may go from a warning to firing the Employee from the Company.

## 4. Whistle-Blower Protection

Vitro shall not tolerate retaliation against whistle-blowers who have presented a report through any means in good faith. Furthermore, it commits to caring for the confidentiality of the reports received. Disciplinary actions shall be adopted against any Employees that retaliate against a colleague who has submitted a complaint.

## 5. Training and Communication

For the appropriate knowledge and compliance of this Code, Vitro is committed to provide the training necessary for the new Employees, as well as for Employees that are already a part of the Company. This training shall be performed on an annual basis for all Employees, and in a reasonable time after having entered the Company. Furthermore, Vitro is committed to developing communication campaigns to ensure that Employees and our Stakeholders have correct knowledge of the Vitro Code of Ethics.



# CERTIFICATE OF RECOGNITION

I (complete name of the Employee, Executive, Member of the Board, Supplier) recognize that I have read and understood the Vitro Code of Ethics and Conduct (“Code of Ethics”), and that my conduct as (Operation Manager, Employee, Executive, Member of the Board, Supplier) of the Company (name of the company) in the performance of my functions as (description of the position) must, at all times, comply with the rules contained in the Code of Ethics, as well as any legal provisions, policies and guidelines established by Vitro, S.A.B. de C.V. and its subsidiaries (“Vitro”).

I commit in good faith to express, at the time that I have knowledge of situations of conflict of interest or practices contrary to the rules contained in the Code of Ethics, through the conduct that Vito has established.

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Signature

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Date

# VITRO CODE OF ETHICS AND CONDUCT

## CERTIFICATE OF ACCEPTANCE

As (description of the position) of (name of the subsidiary) (jointly with Vitro, S.A.B. and all its subsidiaries referred to hereinafter as “Vidro”), I certify that I adhere to the following responsibilities as well as the rules contained in the Vitro Code of Ethics and Conduct (“Code of Ethics”) and any legal provision, policy or guideline established by Vitro.

- Acting with honesty and integrity, avoiding actual or apparent conflicts of interest, involving my personal relationships with my professional activities.
- Provide Vitro’s executives and its authorized companies to receive it, total, fair, complete, objective, timely and understandable information.
- Comply and cause to comply, in the scope of my competency, with the laws, rules and regulations that establish obligations for Vitro, in the countries where it does business.
- Act always with good faith, with responsibility, care, competence and professional diligence, without falsifying material facts.
- Act objectively without permitting subordinating my independence of judgment.
- Keep Vitro’s information confidential, except when I am expressly authorized to disclose it and avoid using it for personal benefit.
- Share my knowledge and experience with the personnel, to facilitate the communication of the Code of Ethics’ rules.
- Promote ethical behavior between the personnel that I’m in charge of, and which are under my supervision, to comply with the rules established by the Code of Ethics.
- Establish the controls necessary to avoid that the external personnel have access to the information owned by Vitro and in case that this is necessary by the work that is performed, sign a confidentiality agreement that protects Vitro’s interests.
- Act with honesty and responsibility in the use and control of the assets and resources owned by Vitro and/or its companies and entrusted to me.

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Name and signature

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Date

