



## **Code of Social Responsibility**

Libbey Inc. and its subsidiaries are committed to the cause of social justice. (In this Code of Social Responsibility, we refer to Libbey Inc. and its subsidiaries as “we” or “Libbey.”) As a part of Libbey’s commitment, we strive to make all of our employees, wherever located around the world, our partners in fulfilling this commitment to social justice. In order to educate all of our employees with respect to their rights and responsibilities with respect to this commitment, we have put together this policy.

### **COMPLIANCE WITH APPLICABLE LAWS AND PRACTICES**

We are committed to complying with all local and national laws and regulations of the jurisdictions in which we do business.

We guarantee to our customers that our products do not infringe the patents, trademarks or copyrights of others.

### **EMPLOYMENT CONDITIONS**

We are committed to ensuring a safe and healthy work environment that respects the rights of each of our employees. In that connection, we specifically commit to provide our employees with the following:

**Wages and Benefits** -- We will fairly compensate our employees by providing wages and benefits that are in compliance with the local and national laws, or, if higher, prevailing local industry practices, of the respective jurisdictions in which our employees work.

**Hours of Labor** -- We will maintain and record employee work hours in compliance with the laws and prevailing local industry standards of the respective jurisdictions in which our employees work. We will not require our employees to work more than the maximum amount of time permitted under local law for any weekly, daily or monthly period. We will provide our employees with all legally mandated days off and leave privileges, and, except under extenuating circumstances, we will encourage our facilities to require that our employees work no more than 60 hours in any seven (7) day period, with at least one day off during that period. If we require an employee to work overtime (as defined by local law), we will compensate the employee for that time in accordance with local law.

**Forced Labor/Prison Labor** – We employ our employees on a voluntary basis and will not permit or otherwise tolerate the use of forced, bonded, indentured or prison labor. We will not permit or otherwise tolerate any action that prevents an employee from freely exercising his or her right to leave the employment of Libbey and its subsidiaries.

**Disciplinary Practices** – One of Libbey's core values is respect. Accordingly, we require that all of our employees be treated with respect and dignity, and we do not allow the use of corporal punishment, physical, psychological or verbal harassment or other forms of mental or physical coercion, abuse or intimidation with respect to our employees.

**Child Labor** -- We will not use child labor, and we will not tolerate the use by our subcontractors or suppliers of child labor in connection with the manufacture or supply of finished goods to us. In that connection, we define "child labor" in accordance with the International Labour Organisation conventions that have been adopted by more than 120 countries. These conventions define "child labor" as any work by children under the age of 12; work by children under the age of 15 that prevents school attendance; and work by children under the age of 18 ("young people") that is hazardous to the physical or mental health of the child. We support the development of legitimate workplace apprenticeship programs for the educational benefit of young people as long as they are not being exploited or given jobs that are dangerous to their health or safety.

**Discrimination/Human Rights** -- We believe that all terms and conditions of employment should be based on an individual's ability to do the job rather than on the basis of personal characteristics or beliefs. We respect the basic principles of human rights and do not discriminate against employees in hiring practices or any other term or condition of work, on the basis of race, color, religion, gender, sexual orientation, age, national origin, marital status, pregnancy, disability or veteran status.

**Freedom of Association and Collective Bargaining** -- We respect the rights of our employees to decide whether to associate or not to associate with any group or groups, as long as the groups with which our employees associate are legal in the countries in which the respective employees are located.

## **WORKPLACE ENVIRONMENT**

**Health, Safety & Environment** -- We are committed to ensuring that all production and manufacturing processes are carried out in conditions that have proper and adequate regard for health, safety and the environment. At a minimum, we will comply with all health, safety and environmental laws and regulations in the countries and localities in which our facilities are located.

**Immigration law and compliance** -- We will employ only workers who have the legal right to work in the respective countries in which they are employed. In order to confirm that our employees have the legal right to work in the respective countries in which they are employed, we will review the original documentation of the employees. We may make and keep photocopies of the original documents that confirm our employees' right to work in the respective countries in which they are employed. In no event will we keep any original document of an employee that would limit the employee's ability to travel in and outside of the country in which the employee works.

## **FACTORY INSPECTIONS AND MONITORING**

We will monitor compliance with this Code of Social Responsibility by all of our subsidiaries engaged in the manufacture or distribution of products. We will perform internal audits to confirm compliance, and we will hire a third-party auditing company to inspect each of the manufacturing facilities at least once per year or as we otherwise determine is necessary in order to ensure compliance. We will make the results of these inspections / audits available to our customers who request them.

We will maintain all documentation required by law and our customers to demonstrate that we comply with the laws and regulations of each country in which our facilities are located or we otherwise do business. From time to time we will review our records to ensure compliance with this Code of Social Responsibility and to ensure compliance with the laws and regulations of each country in which our facilities are located or we otherwise do business.

## **SECURITY**

We will maintain adequate security at all of our production and warehousing facilities, and we will implement supply chain security procedures designed to prevent the introduction of non-manifested material (e.g. illegal drugs, explosives, biohazards, and/or other contraband) into shipments to or from our facilities. Additionally, we will maintain written security procedures and documentation of the controls implemented to guard against introduction of non-manifested material.

## **LIBBEY GIFT AND GRATUITY POLICY**

**Certain of our departments may have a policy that imposes stricter limits than are set below with respect to our employees' receipt of gifts and entertainment. Our employees are required to check with the heads of their departments to determine whether there are stricter rules that apply to them.**

*Accepting gifts and entertainment* – We will permit employees to receive entertainment in the form of golf outings, dinners and tickets to the theater, sporting events and similar entertainment, as long as the entertainment is both legal and occasional and the cost to the donor is within reason. An employee may accept gifts of nominal value, such as promotional items, as long as it does not compromise his or her business judgment. Accepting personal gifts of cash or cash equivalents in any amount, or requesting or soliciting personal gifts, favors or entertainment, is prohibited.

We require that our employees make every effort to refuse or return a gift or entertainment that is beyond these permissible guidelines. If it would be uncomfortable or insulting for an employee to refuse or return a gift or entertainment, the employee is required to report the gift or entertainment promptly to his or her supervisor. His or her supervisor will bring the matter to the attention of the Legal Department, which may require the employee to donate the gift to an appropriate community organization or to share it among coworkers. Employees having any questions about whether it is permissible to accept a gift or something else of value are required to contact their supervisors or the Legal Department for additional guidance.

If an employee is permitted to receive, and does receive, gifts or entertainment provided by someone doing business with Libbey, and if the value of the gift or entertainment exceeds \$50, the employee is required to register the gift or entertainment event by completing the information required at [reportgifts@libbey.com](mailto:reportgifts@libbey.com). The employee also is required to advise his or her supervisor with respect to any such gift or entertainment event. Additional information regarding Libbey's Gift Registry Policy is available in Libbey's Code of Business Ethics and Conduct.

*Providing gifts and entertainment* – If an employee wishes to give a gift, or provide entertainment, to an organization or individual with whom we have or seek to have a business relationship, the employee is required to first make sure that it is permissible legally and under the policy of the recipient. Employees are not permitted to give a gift, gratuity, “payoff” or facilitation fee, or provide entertainment, to a government official or representative without first obtaining the approval of the Legal Department.

## **POSTING**

We will post a copy of this policy in a prominent place at each Libbey manufacturing or warehousing facility. The copy posted at each facility will be in the language spoken at the facility.

## **NOTICES OF VIOLATION**

If you know of or have reason to suspect a violation of this policy, you should contact Libbey's Legal Department at (419) 325-2378 or (419) 325-2536 or call Libbey's Ethics Hotline at:

- 1-866-213-5173 – if you are calling from U.S. and Canada
- 10-800-711-0713 – if you are calling from Northern China
- 10-800-110-0656 – if you are calling from Southern China
- 0800-023-2086 – if you are calling from the Netherlands
- 001-888-670-7859 – if you are calling from Mexico
- 800-8-11581 – if you are calling from Portugal