

## **UK Modern Slavery Act Disclosure Statement 2017**

This Disclosure Statement (“Statement”) has been published pursuant to section 54(1) of the UK Modern Slavery Act 2015 (“the Act”) and is made on behalf of O-I Europe Sarl, O-I Manufacturing UK Ltd and O-I Sales and Distribution UK Ltd, all of which are in scope for the purposes of the Act (and together are referred to herein as the “O-I UK entities”). This Statement sets out the steps taken by the O-I UK entities during the fiscal year ending December 31, 2017. In accordance with the Act, this Statement is published on the group company’s website [www.o-i.com](http://www.o-i.com).

The O-I UK entities are subsidiaries of Owens-Illinois, Inc. (the “Company” or “O-I”). As a part of the O-I global organization, the O-I UK entities are committed to high standards of ethical conduct and compliance with applicable laws. It is the O-I UK entities’ expectation that their suppliers also conduct themselves in this manner. The O-I UK entities’ commitment to ethical conduct and compliance with laws includes compliance with laws prohibiting human trafficking and slavery. The UK Modern Slavery Act 2015 defines “modern slavery” as including the offences of “slavery, servitude and forced or compulsory labor” as well as “human trafficking”.

### **Business and Organizational Structure**

O-I Manufacturing UK Ltd operates two glass manufacturing plants in the United Kingdom. The Company is the largest manufacturer of glass containers in the world with 78 glass manufacturing plants in 23 countries. The Company’s principal manufacturing facilities are listed in the Company’s Form 10-K which the Company files with the U.S. Securities and Exchange Commission.

The Company produces glass containers for alcoholic beverages, including beer, flavored malt beverages, spirits and wine. The Company also produces glass packaging for a variety of food items, soft drinks, teas, juices and pharmaceuticals. More information about the Company, its business and organizational structure can be found at [Owens-Illinois, Inc. Form 10-K for the Fiscal Year Ended December 31, 2017](#).

### **Supply Chain**

The O-I UK entities’ supply chain is a complex business process that encompasses cross-border flows of material, information and cash. The O-I UK entities manage a variety of suppliers who provide a wide range of products and services for their operations.

These suppliers provide raw materials, energy, logistics, packaging, maintenance and repairs, services and capital goods. The primary raw materials used in the glass container operations are sand, soda ash, limestone and recycled glass (cullet). The O-I UK entities expect their suppliers to adhere to the same high standards of business conduct that they follow.

### **Relevant Policies**

[O-I’s Global Code of Business Conduct and Ethics](#), which applies to every one of the Company’s employees worldwide regardless of their role or seniority, states that O-I complies with various laws intended to protect human rights including laws prohibiting child labor, forced labor and human trafficking. The Code of Conduct provides as follows:

#### **“Human Rights and the Law”**

O-I complies with the employment laws in every country in which it operates. O-I does not use child labor or forced labor. It does not allow physical punishment or abuse. O-I respects the freedom of individual employees to join, or refrain from joining, legally authorized associations or organizations. O-I complies with all applicable laws prohibiting human trafficking.

O-I has its Code of Conduct to educate and hold its employees responsible for conducting O-I's business in compliance with applicable laws and in accordance with the Company's standards of ethical conduct. Employees who violate the Code of Conduct are subject to appropriate discipline, up to and including dismissal.

The O-I UK entities expect compliance with all applicable laws by suppliers with whom the O-I UK entities have a contractual relationship. This include compliance with laws forbidding human trafficking and slavery.

#### **Due Diligence in the Supply Chain**

Prior to 2017, O-I has from time to time distributed a sustainability questionnaire to certain of its direct suppliers. These included suppliers to the O-I UK entities. The suppliers have been asked, among other questions, whether they are in compliance with applicable slavery and human trafficking laws in the countries in which they operate. O-I assesses the disclosures made by the suppliers.

O-I operates its Ethics and Compliance Helpline, a telephone and internet-based resource which can be used by employees worldwide as well as O-I's business partners to report legal or ethical concerns which would include suspected violations of human rights. The Helpline is available in multiple languages. Reporters may choose to make their report anonymously. O-I has a strict non-retaliation whistleblowing policy prohibiting retaliation against anyone making a report in good faith.

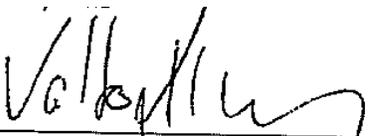
#### **Training**

The Company provides on an on-going basis online compliance training relating to the Code of Conduct, anti-corruption and respect in the workplace. This training is distributed to salaried employees globally on an annual basis. In 2017, the training included training on the risks of modern slavery in a company's supply chain.

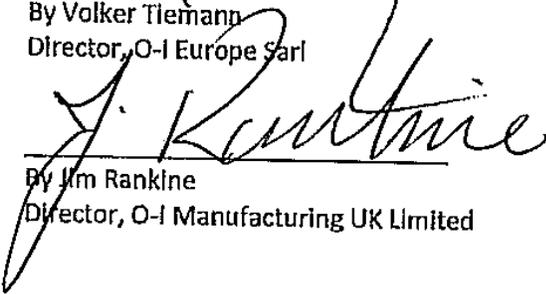
Employees are encouraged to raise legal or ethical concerns through various reporting channels such as their supervisors, another member of management, Human Resources or O-I's Ethics and Compliance Helpline.

This Statement has been approved by the board of directors of O-I Europe Sarl, O-I Manufacturing UK Ltd and O-I Sales and Distribution UK Ltd.

June, 2018



By Volker Tiemann  
Director, O-I Europe Sarl



By Jim Rankine  
Director, O-I Manufacturing UK Limited



By Scott Gibb  
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