

Supply Chains Act Report (Fiscal Year 2024)

O-I Canada Corp.

1. Introduction

The Fighting Against Forced Labour and Child Labour in Supply Chains Act (the “Act”) requires that businesses disclose the actions they have taken during the fiscal year to prevent and reduce the risk of forced labor or child labor within their operations and their supply chain.

This Report describes the activities of O-I Canada Corp. (“O-I Canada”), which is a reporting entity under the Act. This Report covers O-I Canada’s fiscal year from January 1, 2024, to December 31, 2024 (the “Reporting Period”).

As a part of the O-I global organization, O-I Canada is committed to high standards of ethical conduct and compliance with applicable laws. It is O-I Canada’s expectation that its suppliers also conduct themselves in this manner. O-I Canada’s commitment to ethical conduct and compliance with laws includes compliance with laws prohibiting human trafficking, slavery and child labor.

2. O-I Canada’s Structure, Activities, and Supply Chains

O-I Canada is a Nova Scotia corporation. O-I Canada is an affiliate of O-I Glass, Inc. (“O-I” or the “Company”), a Delaware corporation and one of the leading manufacturers of glass containers in the world. O-I is not a reporting entity under the Act.

O-I Canada operates two glass manufacturing plants in Canada – one in Brampton, Ontario and another in Montreal, Quebec. O-I Canada has approximately 700 employees, all of which are located in Canada.

O-I and its affiliates operate 69 glass manufacturing plants in 19 countries. O-I competes in the glass container segment of the rigid packaging market and is the leading glass container manufacturer in most of the countries where it has manufacturing facilities. 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 in O-I Glass, Inc.'s Form 10-K for the fiscal year ended December 31, 2024.

O-I Canada's supply chain is a complex business process that encompasses cross-border flows of material, information and money. O-I Canada manages a variety of suppliers who provide a wide range of products and services for its 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). 99 percent of O-I Canada's supplier spend is with suppliers located in Canada and the U.S. The remaining 1 percent of the spend is with suppliers located in the E.U., Latin America, and Asia. O-I Canada expects its suppliers to adhere to the same high standards of business conduct that it follows.

3. Company policies and due diligence processes in relation to forced labor and child labor

The policies and due diligence processes set out in this section are implemented globally by O-I and are adopted by O-I Canada.

O-I's Global Code of Business Conduct and Ethics, which was revised on May 13, 2025, applies to O-I Canada's employees regardless of their role or seniority. The Code of Conduct states that O-I complies with various laws intended to protect human rights including laws prohibiting child labor, forced labor, modern slavery 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, forced labor, or any form of modern slavery. 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 expects compliance with all applicable laws by suppliers with whom O-I has a contractual relationship. This includes compliance with laws forbidding human trafficking, slavery and child labor."

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.

O-I Canada expects compliance with all applicable laws by suppliers with whom O-I Canada has a contractual relationship. This includes compliance with laws forbidding human trafficking, slavery and child labor.

O-I's Supplier Guiding Principles (the "Principles") were adopted in 2019 and have been distributed to O-I's suppliers in order to build awareness regarding the Principles. The Principles apply to O-I's affiliates and business units worldwide, including O-I Canada. The Principles can be found at online [Supplier-Guiding-Principles-from-O-I-External-website.pdf](#).

The Principles reinforce O-I's expectations that its suppliers will conduct their business in compliance with applicable laws and regulations and in accordance with high ethical standards. The Principles encompass a number of different topics including:

- Minimum age for employment
- Forced labor
- Child labor
- Human trafficking/modern slavery
- Abuse and harassment
- Discrimination
- Freedom of association
- Work hours, work week, and payment of wages

The Principles state that:

- Suppliers will not employ anyone under the legal working age as defined by local law.
- Suppliers will not use forced or involuntary prison labor.
- Suppliers will comply with all applicable laws prohibiting human trafficking and modern slavery.

At O-I's request, suppliers may be asked to certify their compliance with the Principles and to authorize O-I and its designated agents (including any third parties) to engage in monitoring activities, including on-site inspections based upon reasonable notice.

O-I Canada provides its employees, suppliers and other business partners multiple channels to report illegal or otherwise improper conduct by contacting the relevant O-I Canada manager or another member of management, O-I's Legal Department, the Ethics and Compliance Office, or the O-I's Ethics and Compliance Helpline.

O-I operates its Ethics and Compliance Helpline, a telephone and internet-based resource which can be used by employees worldwide, including O-I Canada employees, as well as business partners to report legal or ethical concerns, which would include suspected violations of human rights. The Helpline is available in multiple languages and can be contacted using www.oietics.com, or 1-800-963- 6396 in the U.S. or Canada or the international Helpline numbers listed on www.oietics.com. Reports made to the Helpline may be made anonymously (subject to local laws). Confidentiality is maintained to the extent possible, consistent with conducting a full investigation of the concerns raised. O-I Canada has a strict non-retaliation whistleblowing policy prohibiting retaliation against anyone making a report in good faith.

The O-I Procurement team has partnered with EcoVadis to enhance the monitoring of the sustainability performance of O-I's, including O-I Canada's, direct suppliers and to facilitate O-I's supplier assessment. EcoVadis is an organization which provides business sustainability ratings, intelligence and collaborative performance improvement tools for global supply chains.

The project is occurring in phases with the initial phase focusing on the assessment by EcoVadis of selected critical and strategic spend suppliers. O-I is using EcoVadis to guide the assessment of O-I's direct suppliers against four sustainability criteria: environment, labor and human rights, ethics, and sustainable procurement. The supplier assessment will aid O-I in monitoring its suppliers' environmental and social performance and identifying the highest risk suppliers.

O-I previously performed a procurement maturity review with EcoVadis to find and define O-I's opportunities for improvement relating to sustainable procurement. Based on the findings, O-I has created a Sustainable Procurement Roadmap, which has been validated and approved by O-I's global Procurement Leadership Team.

As part of O-I's Sustainable Procurement Roadmap, O-I's sourcing process is now considering supplier sustainability performance as one of the performance criteria. Supplier sustainability performance is defined against the Supplier Guiding Principles, which will be aligned with the reporting criteria from EcoVadis. O-I's supplier relationship management program is being enabled by a new source-to-pay platform which is being implemented in phases that will be enhanced with data on suppliers' sustainability performance as well as suppliers' certifications related to sustainability, EHS, and minority and/or women-owned business enterprise (MWBE).

4. Risk of forced labor or child labor being used and the steps O-I Canada has taken to assess and manage that risk

O-I Canada considers there to be a limited risk of forced and child labor occurring in its operations. Geographically, O-I Canada is conducting business in Canada, which, according to the Global Slavery Index, has a low prevalence of forced and child labor, a low risk of vulnerability to forced and child labor, and comparatively robust governmental oversight of the issue. Moreover, O-I Canada's workforce is governed by the applicable federal and provincial labor and employment standards, in addition to O-I's Code of Conduct and employment-related policies and procedures. O-I Canada's suppliers are predominantly located in the United States and Canada.

The plants operated by O-I Canada, together with substantially all of O-I's plants globally, are members of an organization known as SEDEX which collects ESG related data on entities' operations through plant audits and other assessment tools. O-I Canada's customers who are members of SEDEX have access to O-I Canada related information contained in the SEDEX database.

Based on International Labor Organization's fundamental conventions and declarations, O-I has screened for human rights risks that could be posed in O-I Canada's operations, including its supply chain. The latest Global Estimates reports relating to forced labor and child labor have identified countries or regions of the world where the risk of injustices, such as modern slavery, child or forced labor are higher. O-I is in the initial phase of utilizing on a limited basis a third party risk tool to assess and monitor goods/countries that have been identified as high risk.

In the event that O-I Canada is informed of, or discovers, the potential or confirmed presence of forced and child labor in its supply chains, O-I Canada will investigate and take such remedial measures as management deems appropriate.

O-I Canada did not identify any instances of forced labor or child labor in its activities or its supply chains during the Reporting Period and, therefore, no remedial measures were taken, including those related to remediating the loss of income or economic impact on the most vulnerable families.

5. Training provided to employees on forced labor and child labor

O-I provides online compliance training relating to O-I's Code of Conduct to its salaried employees globally, including O-I Canada employees, on an annual basis. Upon completion of the training, employees are asked to certify that they will comply with O-I's Code of Conduct.

O-I's global Procurement personnel have received training, provided by EcoVadis, related to sustainable procurement. The sustainable procurement training introduced five key areas in sustainability: respect for human rights, labor standards, health and safety,

environmental impact, and business ethics. Procurement personnel have, on a voluntary basis, unlimited access to EcoVadis training resources including training on forced labor and child labor.

6. Effectiveness assessments

As part of O-I's approach to assessing the effectiveness of its compliance processes, O-I Canada reviews such metrics as the following:

- Tracking training completions by salaried employees of annual Code of Conduct online training,
- Monitoring reports made to the Company's global Ethics and Compliance Helpline, and
- Tracking the initiation and closure of investigations relating to concerns raised through O-I's Helpline and other reporting channels.

In the future, O-I Canada may consider such additional measures to assess effectiveness as its management may deem appropriate.

Attestation:

This report has been approved by the Board of Directors of O-I Canada Corp. pursuant to section 11(4)(a) of the Act.

Signature: /s/ Scott W. Gedris

Full Name: Scott W. Gedris

Title: Director

Date: May 22, 2025

I have authority to bind O-I Canada Corp.