

O-I Disclosure for California Transparency in the Supply Chain Act

The California Transparency in Supply Chains Act (the Act) requires retailers and manufacturers that do business in California to publicly disclose their efforts to eliminate slavery and human trafficking from their supply chains.

O-I as a company has had a longstanding commitment to high standards of ethical conduct and compliance with applicable laws. It is our expectation that our suppliers also conduct themselves in this manner.

O-I's responses to the questions contained in the Act are set out below.

O-I distributes a sustainability questionnaire to certain of its direct suppliers. The suppliers are 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. The evaluations are not conducted by a third party. O-I does not audit its suppliers to evaluate compliance with company standards for trafficking and slavery in the supply chain. O-I does not currently require suppliers to certify that all materials incorporated into their product comply with slavery and human trafficking laws where they do business. O-I expects compliance with all applicable federal, state and local laws by suppliers with whom O-I has a contractual relationship. Compliance with such laws includes compliance with laws forbidding human trafficking and slavery.

O-I has its Global Code of Business Conduct and Ethics (the Code of Conduct) to educate and hold employees responsible for conducting O-I's business in compliance with applicable laws and in accordance with the Company's standards of ethical conduct. 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."

Employees who violate the Code of Conduct are subject to appropriate discipline, which may include termination of employment.

O-I provides periodic training on its Code of Conduct. However, O-I does not currently train its employees and management who have direct responsibility for supply chain management on human trafficking and slavery issues relating to product supply chains.