

## **UK Modern Slavery Act Disclosure Statement 2025**

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 and O-I Glass Limited (formerly O-I Manufacturing UK Ltd), both 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 constitutes the slavery and human trafficking statement for the purposes of section 54(1) of the Act and sets out the steps taken by the O-I UK entities during the fiscal year ending December 31, 2025. 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 O-I Glass, 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 Glass Limited operates two glass manufacturing plants in the United Kingdom—one in Harlow and another in Alloa. O-I Glass Limited makes periodic payments to O-I Europe Sarl for strategic and administrative services as well as access to O-I manufacturing technology and O-I trademarks. O-I Europe Sarl does not manufacture or sell glass containers and does not own inventory or manufacturing assets.

O-I is one of the leading manufacturers of glass containers in the world with 64 glass manufacturing plants in 18 countries. It 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 31,2025.

### **Supply Chain**

The O-I UK entities’ supply chain is a complex business process that encompasses cross-border flows of material, information and money. 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 majority of the O-I UK entities’ supplier spend is with suppliers located in the United Kingdom and the European Union, with most spend concentrated in the United Kingdom for O-I Glass Limited. A smaller portion of supplier spend relates to suppliers located in other regions, including Asia and the Americas. The O-I UK entities expect their suppliers to adhere to the same high standards of business conduct that they follow.

### **Relevant Policies**

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

O-I’s Global Code of Business Conduct and Ethics, which was revised on July 16, 2025, applies to the O-I UK entities’ employees regardless of their role or seniority. The Code of Conduct affirms a commitment to conducting

operations in compliance with applicable employment and human rights laws, including laws prohibiting child labour, forced labour, modern slavery, and human trafficking. The Code also reflects O-I and O-I UK entities expectations regarding respectful workplace practices, freedom of association, and compliance with applicable labour standards. In addition, O-I and the O-I UK entities expect suppliers with whom they have a contractual relationship to comply with applicable laws, including those prohibiting human trafficking, slavery, and child labour.

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

**Due Diligence in the Supply Chain**

O-I’s [Supplier Guiding Principles](#) (the “Principles”) were adopted in 2019 and made available to O-I’s suppliers to raise awareness of O-I’s expectations. The Principles apply to O-I’s affiliates and business units worldwide, including the O-I UK entities, and are available online at [Governance - Governance Documents | O-I Glass, Inc.](#)

The content of the Principles was reviewed and updated in 2025. Following that update, a renewed supplier outreach campaign was conducted. As part of this campaign, select suppliers were asked to review the Principles and confirm compliance through O-I’s online system.

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 cover a number of 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 set forth the expectation 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 with reasonable notice.

The O-I UK entities provide their employees, suppliers and other business partners multiple channels to report illegal or otherwise improper conduct. These include the relevant O-I UK entities manager or another member of management, O-I’s Legal Department, the Ethics and Compliance Office, or the O-I Ethics and Compliance Helpline ([www.oiethics.com](http://www.oiethics.com)).

O-I operates its Ethics and Compliance Helpline, a telephone and internet-based resource that can be used by employees worldwide, including O-I UK entities' employees, as well as business partners and other third parties, to report legal or ethical concerns that would include suspected violations of human rights. The Helpline is available in multiple languages and can be accessed using [www.oietics.com](http://www.oietics.com), or the international Helpline numbers listed on [www.oietics.com](http://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. The O-I UK entities have a strict non-retaliation whistleblowing policy prohibiting retaliation against anyone making a report in good faith.

The O-I Procurement team utilizes EcoVadis as one of its tools to support visibility into sustainability performance of O-I's direct suppliers, including suppliers supporting the O-I UK entities. EcoVadis provides business sustainability ratings and related intelligence across four areas: environment, labor and human rights, ethics, and sustainable procurement.

The EcoVadis program is implemented in phases. Initial activities focus on identifying and segmenting select suppliers based on business relevance, assigning internal supplier ownership within the EcoVadis platform, and making sustainability-related information available to designated supplier owners. Sustainability data available through EcoVadis, including supplier ratings and related information, is used as an input to support internal awareness of supplier sustainability topics. These activities are conducted using a risk-based approach that prioritizes suppliers and categories based on factors such as geography, sector-specific risks, and business criticality. EcoVadis complements its rating methodology with ongoing monitoring of publicly available information and media sources related to suppliers. Should relevant developments be identified—such as matters related to labor and human rights—those updates would be reflected within the EcoVadis platform and communicated to designated internal supplier owners through periodic notifications, supporting visibility into sustainability-related developments associated with suppliers.

In addition, O-I has access to EcoVadis sustainability information where suppliers already hold an EcoVadis rating independently and make such information available to O-I.

O-I previously completed a procurement maturity review with EcoVadis to assess its sustainable procurement framework and identify areas for further development. In 2026, O-I initiated another procurement maturity assessment. The outcome of this assessment will support the ongoing development of O-I's sustainable procurement practices. Supplier sustainability considerations, including alignment with O-I's Supplier Guiding Principles, form part of O-I's sustainable procurement agenda. Activities to strengthen the integration of sustainability considerations into supplier management and sourcing processes are being progressed in a structured and phased manner.

### **Risk Assessment**

The O-I UK entities consider there to be a relatively limited risk of modern slavery occurring in their operations, while recognizing that risks may exist within global supply chains. Geographically, the O-I UK entities are conducting business in the UK, which, according to the Global Slavery Index, has a low prevalence of modern slavery, a low risk of vulnerability to modern slavery, and comparatively robust governmental oversight of the issue. Moreover, the O-I UK entities' workforce is governed by the applicable labor and employment standards, in addition to O-I's Code of Conduct, and employment-related policies and procedures. The O-I UK entities' suppliers are predominantly located in the UK and the EU. Notwithstanding this assessment, the O-I UK entities recognize that no supply chain is entirely risk-free.

The plants operated by the O-I UK entities, 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 self-reported information, audits where applicable, and other assessment tools. The O-I UK entities' customers who are members of SEDEX have access to the O-I UK entities' 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 the O-I UK entities' operations, including their supply chains. The latest Global Estimates reports relating to modern slavery have identified countries or regions of the world where the risk of injustices, such as modern slavery are higher. O-I is in the early stages of utilizing on a limited basis a third party risk tool to assess and monitor goods/countries that have been identified as high risk, with a focus on informing risk awareness rather than serving as a sole or exhaustive risk-identification mechanism.

In the event that O-I UK entities are informed of, or discover, the potential or confirmed presence of modern slavery in their supply chains, the O-I UK entities will investigate and take such remedial measures as management deems appropriate, taking into account internationally recognized human rights standards.

Based on the information available to the O-I UK entities and the due diligence activities conducted during the Reporting Period, the O-I UK entities did not identify any instances of modern slavery in their activities or supply chains during the Reporting Period. Therefore, no remedial measures were required.

### **Training**

O-I provides online compliance training relating to its Code of Conduct to its salaried employees globally, including the O-I UK entities' 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 also provides annual anti-corruption training to all salaried employees globally. The topics covered in the anti-corruption training rotate over time and one of those topics is forced and child labor.

O-I's Global Procurement personnel have received training, provided by EcoVadis, related to sustainable procurement. The sustainable procurement training introduces 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 modern slavery.

### **Measuring Effectiveness of Steps Taken**

As part of O-I's approach to measuring the effectiveness of its compliance process, and taking into account the nature and scale of its operations and supply chain, the O-I UK entities do the following:

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

These measures are intended to provide indicators of program effectiveness and internal oversight, while continuing to evolve toward more direct measures of supply chain risk over time.

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

This Statement has been approved by the boards of directors of O-I Europe Sarl and O-I Glass Limited.

June 24, 2026

By /s/ Alessandro Cantile

Director, O-I Europe Sarl

By /s/ Victoria Lawless-Mitchell

Director, O-I Glass Limited