

## **UK Modern Slavery Act Disclosure Statement 2022**

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), 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, 2022. 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. The Company is one of the leading manufacturers of glass containers in the world with 69 glass manufacturing plants in 19 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 at [O-I Glass, Inc. Form 10 K for the Fiscal Year Ended December 31, 2022](#).

### **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 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 includes compliance with laws forbidding human trafficking and slavery.

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

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 can be found at [www.o-i.com](http://www.o-i.com). 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 emphasize suppliers' compliance with all applicable laws and regulations including labor, environmental, workplace health and safety, and anti-corruption. This includes suppliers' compliance with all applicable laws prohibiting human trafficking and modern slavery.

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.

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's operations, including the supply chain. The latest Global Estimates reports have identified areas of the world where the risk of injustices, such as modern slavery, child or forced labor are higher.

The O-I Procurement team has partnered with EcoVadis, to better monitor the sustainability performance of O-I's 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 supplier assessment against four sustainability criteria: environment, labor and human rights, ethics, and sustainable procurement. The supplier assessment will aid O-I in monitoring its supplier's environmental and social performance.

### **Training**

The Company provides online compliance training relating to O-I's Code of Conduct, anti-corruption procedures and respect in the workplace to salaried employees globally on an annual basis. In a prior year, this included training on the risks of modern slavery in a company's supply chain. In addition, O-I's 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.

Employees are encouraged to raise legal or ethical concerns through various reporting channels such as their supervisor, another member of management, Human Resources or O-I's Ethics and Compliance Helpline. O-I employees worldwide as well as O-I's business partners may ask questions or report legal or ethical concerns using O-I's Ethics and Compliance Helpline, a telephone and internet-based resource operated by an independent third party. The Helpline is available in multiple languages and can be contacted using [www.oietics.com](http://www.oietics.com), or 1-800-963-6396 in the U.S. or Canada 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.

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

June 14, 2023

By /s/ Vitaliano Torno  
Director, O-I Europe Sarl

By /s/ Jim Rankine  
Director, O-I Glass Limited