UK Modern Slavery Act Disclosure Statement 2024

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 sets out the steps taken by the O-I UK entities during the fiscal year ending December 31, 2024. In accordance with the Act, this Statement is published on the group company's website 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 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.

O-I Glass Limited produces mainly glass containers for the spirits and beer markets. O-I produces glass containers for alcoholic beverages, including beer, flavored malt beverages, spirits and wine. It also produces glass packaging for a variety of food items, soft drinks, teas, juices and pharmaceuticals. More information about O-I, its business and organizational structure can be found at O-I Glass, Inc. Form 10K for the Fiscal Year ended December 31 2024.

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). 99 percent of the O-I UK entities' supplier spend is with suppliers located in the UK and the EU with more than 80 percent of the spend being with UK-based suppliers. The remaining 1 percent of the spend is with suppliers located in Asia. 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 Global Code of Business Conduct and Ethics, which applies to every one of the Company's and its subsidiaries' employees worldwide regardless of their role or seniority, including O-I UK entities' employees. The Code of Conduct 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 apply to suppliers of O-I's affiliates and business units worldwide, including the O-I UK entities. The Principles can be found on O-I's external website.

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.

The O-I UK entities provide their employees, suppliers and other business partners multiple channels to report illegal or otherwise improper conduct by contacting 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'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 UK entities' 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 accessed using www.oiethics.com, or the international Helpline numbers listed on the same link. 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 has partnered with EcoVadis to enhance the monitoring of the sustainability performance of O-I's, including O-I UK entities', 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 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).

Risk Assessment

The O-I UK entities consider there to be a limited risk of forced and child labor occurring in their operations. Geographically, the O-I UK entities are conducting business in the UK, 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, 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.

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 plant audits 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 and supply chains. 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.

Training

O-I provides online compliance training relating to O-I's Code of Conduct to its salaried employees globally, including 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'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 forced labor and child labor.

Measuring Effectiveness of Steps Taken

As part of O-I's approach to measuring the effectiveness of the steps taken with respect to any potential modern slavery risks in its operations or supply chain, the O-I UK entities review 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.

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

June 24, 2025

By /s/ Vitaliano Torno

Director, O-I Europe Sarl

By /s/ Jim Rankine

Director, O-I Glass Limited