



# **GLOBAL CODE OF BUSINESS CONDUCT AND ETHICS**

**LEADING WITH INTEGRITY**



# Letter from the CEO

Hello Colleagues,

It is a privilege to serve as the President and CEO of O-I Glass, Inc., an iconic company whose roots date back to its founding in 1903 by Michael J. Owens. Over the years, O-I has rightfully earned its reputation as a company that operates with unwavering commitment to high ethical standards and compliance with laws. Every O-I employee contributes to this legacy by striving to do the right thing in the right way, every day. At O-I, leadership isn't defined by titles alone. Leadership is about holding ourselves and each other accountable for acting with integrity. This shared commitment to integrity is what drives O-I forward and defines who we are as a company.

To support our employees in making sound decisions, we have established a set of Operating Principles. These principles serve as a guiding framework to help us create a better workplace and business. Among these Operating Principles, safety stands out as our number one priority. We expect all employees to adopt a "Stop. Think. Protect." mindset, fostering a culture of vigilance and care.

Our Global Code of Business Conduct and Ethics is structured around the six Operating Principles. The Code sets the standards for how we do business around the world. I expect all of you to be familiar with the Code and the underlying policies, especially those directly relevant to your role. If you have any questions after consulting the Code, please seek advice from your supervisor or from one of the other resources identified at the end of the Code.

By ensuring that our decisions and actions align with the Operating Principles and the Code, we can achieve success together and continue our journey toward a safe and sustainable future for O-I.

Stay safe,

Gordon Hardie  
President and Chief Executive Officer



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# Introduction

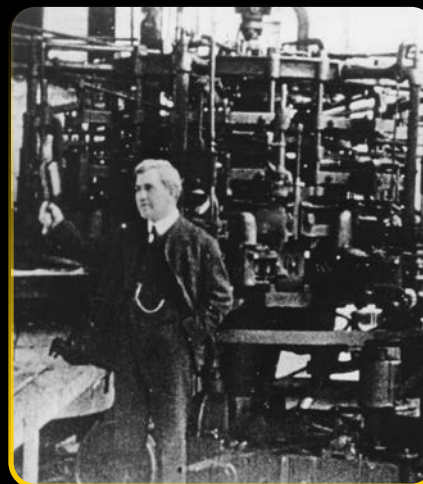
Founded in 1903 in Ohio by Michael J. Owens, the inventor of the automatic bottle making machine, O-I has grown to become the global leader in glass packaging. On its own, glass is pure, natural, and infinitely recyclable. That is why glass has been used for millennia to protect, preserve, and deliver food, beverages, and other products that enrich and sustain our way of life. O-I serves and partners with thousands of customers, many of whom produce the world's best known food and beverage brands. O-I employs approximately 21,000 people across the world.

Our founder Michael Owens inspired employees by saying "It can be done." Over the years, as O-I employees have put into action this simple four word phrase, they have been guided by the following principles which have helped to establish and sustain O-I's reputation:

- compliance with applicable laws and regulations, and
- adherence to high standards of ethical conduct including a commitment to total and unwavering integrity.

**This has allowed O-I to build a reputation for high standards of ethical conduct which endures today.** It is a reputation that is sustained by the actions taken and decisions made by every employee every day.

As individual employees, each of us leads with integrity when we treat each other with respect and keep our promises. We lead with integrity when we perform our business roles with excellence, pride, passion and professionalism. Finally, we lead with integrity when our individual actions and decisions are guided by our own good judgment and by the highest ethical standards.





# Operating Principles

We will reshape O-I to make it a safer, fit, sustainable, and more valuable company as we **build shared value with our customers.**

O-I's executive management has established Operating Principles which enable employees to put values into action. The Operating Principles serve as a framework for employees to take action and make decisions in their daily work which are consistent with the values of O-I.

From making safety our number one priority to fostering transparency, teamwork, and inclusivity; driving continuous improvement; building shared value with our customers; strengthening leadership through the business and using economic profit to drive value creation, each principle plays a crucial role in our day-to-day operations.

Given the importance of the Operating Principles, this Code of Conduct has been organized around the Operating Principles.



Making **Safety** Our #1 Priority



Operating with **Transparency**, **Teamwork** and **Inclusivity**



Driving **Productivity**, Continuous **Improvement** and **Sustainability**



Building **Shared Value** with Our Customers



Strengthening **Leadership** Through the Business



Using **Economic Profit** to Drive Our Value Creation



## Global Code of Business Conduct and Ethics

This Global Code of Business Conduct and Ethics (“Code”) reaffirms our longstanding commitment to high standards of ethical conduct. The Code describes legal and ethical responsibilities that all O-I employees are expected to fulfill. To the extent that the Code requires a higher standard than commercial practice or applicable laws, rules or regulations, we will adhere to those higher standards globally.

This Code applies to all employees worldwide and to the members of the Board of Directors when they are acting on behalf of O-I. As used in this Code, the terms “employees” or “Company employees” refer to all persons covered by this Code. The terms “Company” and “O-I” include O-I Glass, Inc., and its subsidiaries, affiliates and joint ventures in which O-I has management control.

The Code is a guide and a resource and is intended to help employees understand significant legal and ethical issues that may arise while performing their job responsibilities or while conducting O-I’s business. The Code is not intended to address every ethical issue that an employee might face. It is not a summary of all laws and policies that apply to O-I’s businesses. If a situation is not addressed by the Code or Company policies, employees should use their good judgment along with input from supervisors and management. If employees have any doubts or questions, they should seek advice from the Legal Department or the Ethics and Compliance Office before taking any action.

This Code does not create a contract of employment with any individual. Nothing in the Code should be construed as a promise of any kind or as creating a contract regarding wages or any other working conditions. Employees have the right to terminate their employment at any time for any reason, subject to any written employment agreement. Likewise, subject to any applicable laws and any written employment agreement, O-I has the right to discharge or discipline any employee with or without just cause or prior written warning. O-I reserves the right to amend, supplement or discontinue this Code, and the matters addressed in it, without prior notice, at any time.

Employees may view the Company’s corporate policies, including policies related to a number of topics in this Code, on “O-I Dash,” the Company’s internal employee website.



### WAIVERS AND AMENDMENTS OF THE CODE

Waivers of this Code for employees may be made only by an executive officer of the Company. Any waiver of this Code for members of O-I’s Board of Directors or for O-I’s executive officers or principal financial officers may be made only by O-I’s Board of Directors or the appropriate Board committee and will be publicly disclosed as required by law or by applicable stock exchange rules.





## Making Safety Our #1 Priority

### Intent: Deliver safety as a value and have zero injuries

At O-I, we make safety our #1 priority and we work each day to demonstrate this in practice across our organization. Everyone has a right to a safe workplace and an obligation to work safely, making it a part of our routines, embedded in everything we do. Every O-I employee is responsible for contributing to our journey toward reducing injuries and illnesses.

## Workplace Health and Safety

O-I is committed to providing a safe and healthy work environment for all employees. Although O-I's commitment is founded on compliance with law, it goes beyond that foundation. O-I strives to continuously improve its performance with respect to health and safety in the workplace. As part of this commitment, O-I expects every employee to know and observe the safety and health rules and practices that apply to his or her job.

Each facility, through its management team, must implement a safety program that meets applicable laws and government regulations and includes required and appropriate training for employees. Each facility must work within the O-I EHS Management System, ensuring that every location is committed to a comprehensive Environmental, Health, and Safety (EHS) Management System that drives continuous performance improvement. Employees are responsible for following the training that they receive and for taking other appropriate precautions to protect themselves and their coworkers. This includes immediately reporting accidents, injuries and unsafe practices or conditions

as part of O-I's Open Reporting commitment. Employees are assured they can report issues without fear of retaliation, promoting transparency and accountability across the Company. The health and safety of all employees, as well as the quality standards for O-I products, require each employee to report to work free from the influence of any substance that could prevent them from conducting work activities safely and effectively. This applies when employees are on Company property, in an off-site Company meeting or are conducting business on behalf of the Company.

*See Environment, Health & Safety Policy.*





**“Stop. Think. Protect.”** is the mindset of O-I employees and their approach to caring for each other. Under the umbrella of O-I Cares, Stop. Think. Protect. helps to ensure that safety becomes and remains an integral part of O-I’s workplace culture and that every team member knows their role in maintaining a safe workplace. Everyone is responsible for acting on safety with no exceptions.



## Workplace Violence

Workplace violence, including acts or threats of violence or other forms of intimidation, will not be tolerated and must be reported immediately to your supervisor, another manager, Human Resources, the Legal Department, the Ethics and Compliance Office, or the Ethics and Compliance Helpline.

*See Workplace Violence Policy.*

## Employee Privacy

**O-I is committed to respecting the personal information of employees.**

O-I is committed to respecting the personal information of employees and recognizes the right to privacy and to personal data protection as fundamental rights. This means that access to and processing of such information occurs in accordance with the applicable laws and is limited to personnel who have appropriate authorization and a clear business need for the information. A breach of personal data confidentiality must be reported as soon as possible to the Human Resources or Legal Departments (for Europe a dedicated email address is also available: [gdpr@o-i.com](mailto:gdpr@o-i.com)).

Subject to local laws, employees should not expect privacy when using Company-provided services and equipment. This includes the Company’s information technology resources such as computers, e-mail and internet access.





# What Would You Do?



I noticed activities that may be creating a safety hazard, but it is not in my area and I do not want to get involved. **Do I have to report it?**



Yes, safety is in every employee's "area." It is part of our Stop. Think. Protect. mindset. Report your concern to your manager or the safety professional at your location, another manager, Human Resources, the Legal Department, the Ethics and Compliance Office, or the Ethics and Compliance Helpline. Think how you would feel if someone were badly hurt because you failed to act.



When I reported a potential unsafe condition to my manager, they told me not to report it because it would negatively impact the plant's safety metrics. **Should I do what my manager told me to do or should I report it?**



If you are not comfortable with your manager's request, talk to a safety professional at your location, another member of management, Human Resources, the Legal Department, or the Ethics and Compliance Office. You may also use the Ethics and Compliance Helpline.



## Operating with Transparency, Teamwork and Inclusivity

### Intent: Deliver an open, inclusive and fair working environment

As employees of O-I, we strive for excellence in all aspects of our business. Our success as a company and as individuals depends on the unique contributions of all the people with whom we work. We have a responsibility to treat each other with respect. This brings out the best in people and fosters trust and teamwork.

Transparency is about dealing openly with each other and third parties in a fact-based way. Transparency is about being accurate in our financial reporting and communications with the public. On the other hand, conflicts of interest and engaging in corrupt misconduct with third parties result in a lack of transparency.

### Respect in the Workplace

O-I is committed to a workplace environment where **employees feel valued, supported and empowered**. In such an environment, individuals are treated with respect; people's ideas and contributions are valued; and the workplace is free from harassment and discrimination.

As a global market leader, O-I relies on the contributions of a diverse workforce that includes local people who understand the cultures in the countries and jurisdictions in which we do business. We recognize that people who bring different perspectives or have different backgrounds than other employees can bring valuable insights that positively affect our business and work culture.





O-I prohibits discrimination against applicants for employment and employees on the basis of race, color, sex (including pregnancy, childbirth, or related medical conditions), gender, gender identity or expression, sexual orientation, national origin, ethnicity, mental or physical disability, medical condition, genetic information, ancestry, age, religion, veteran or military status, or any other classification protected by law. O-I is committed to equal opportunity in all aspects of the employment relationship.

O-I prohibits any form of harassment based on any of the protected characteristics described above. This may include harassing behavior by employees, supervisors, managers, suppliers, visitors or customers. Harassment is unwelcome verbal or physical conduct that unreasonably interferes with an employee's work performance or creates a hostile, intimidating or offensive work environment.

In addition, sexual harassment is prohibited. Sexual harassment includes unwelcome sexual advances, derogatory jokes, displaying sexually suggestive materials and other verbal or physical conduct of a sexual nature. It also occurs when submitting to the unwelcome conduct is made a condition of employment or when submitting to or rejecting such conduct is used as a basis for an adverse employment decision affecting the employee.

**Each of us has a personal responsibility to model behaviors that contribute to a work environment that is free from harassment or discrimination.** If you feel that you are being harassed, treated disrespectfully or discriminated against, or are aware of such a situation, contact your supervisor, Human Resources, another member of management, the Legal Department or the Ethics and Compliance Office.

If you are not comfortable with these approaches, you may use the Ethics and Compliance Helpline.

*See Non-discrimination/Non-harassment Policy.*



## Inclusivity

O-I is committed to an inclusive workplace. Inclusion can be defined as the action or state of including or being included within a group or structure. O-I employees are encouraged to avoid using stereotypes that alienate people as well as encouraged to maintain an environment that is open and accepting of different perspectives. **Everyone is on the same team.**

## Privacy/Data Protection

O-I complies with the privacy/data protection laws and regulations which apply to its operations around the world.

If an employee's role includes execution of tasks where processing of personal and/or confidential data is required, **the employee should:**

- Ensure this information is always treated lawfully, carefully and in compliance with the policies and procedures in place at O-I
- If the employee has doubts on how data should be processed, they should contact their functional Leader, local HR or the Legal Department.

A Personal Data Breach occurs when personal data (e.g. bank account, participation in labor unions, judicial information, etc.) which refers to data subjects (e.g. employees, service providers) is stolen, made unavailable or processed by an unauthorized subject (employee, third party, etc.).

Examples of Personal Data Breach events include:

- Unauthorized access or intrusion to information systems (e.g. IT systems)
- A laptop or USB drive containing personal data is lost or stolen
- Unauthorized disclosure of data and documents to third parties

In case of a suspected Personal Data Breach, an employee must immediately notify directly the local IT, local HR, the Legal Department or if the employee is located in the EU, via email at [gdpr@o-i.com](mailto:gdpr@o-i.com).





## Financial Reporting and Accuracy of Books and Records

Our shareholders entrust their assets to us. O-I seeks to safeguard these assets by conducting all aspects of the Company's business with honesty, integrity and high standards of business ethics.

Shareholders and others rely on O-I's financial reports to make decisions. Employees must ensure that the Company's financial disclosures are full, fair, accurate, timely and understandable. All financial books, records and accounts must accurately and fairly reflect the Company's transactions and events. They must also conform to generally accepted accounting principles and to O-I's system of internal controls.

The following are examples of activities that are not consistent with these standards and therefore are not allowed:

- Not disclosing or recording funds or assets that should be disclosed or recorded.
- Recording false sales or recording sales outside of the time period in which they actually occurred.
- Understating or overstating known liabilities and assets.
- Making false entries in any books or records of O-I.

**Employees are expected to understand and comply with the policies, procedures and internal controls that apply to their job responsibilities.** Employees are expected to report any illegal or unethical behavior and raise any concerns about financial reporting or accounting matters to their supervisor, management personnel within O-I's finance/accounting function, the Legal Department, Internal Audit, the Ethics and Compliance Office or through the Ethics and Compliance Helpline. In addition, employees may raise a concern related to accounting, internal accounting controls or auditing matters to the Audit Committee of the O-I Board of Directors.

*See Anti-Corruption Policy; Global Internal Controls Policy.*

## Conflicts of Interest

**All employees must avoid** transactions or activities that result in, or give the appearance of, a conflict between personal interests and those of the Company. Further, employees should never conduct themselves in any manner that, directly or indirectly, would be detrimental to the best interests of the Company.

Specific examples of conduct that may result in conflicts of interest include the acceptance of a gift, loan, benefit or other consideration of value from a supplier or customer, or obtaining a financial interest in a supplier, customer, or competitor.

The Company requires that employees disclose any situations that reasonably would be expected to give rise to a conflict of interest. If any employee suspects that he or she has a conflict of interest, or something that others could reasonably perceive as a conflict of interest, the employee must report it to their supervisor or the Legal Department. The supervisor and the Legal Department will then work with the employee to determine whether there is a conflict of interest and, if so, how best to address it. Although conflicts of interest are not automatically prohibited, they are not desirable. A conflict may only be waived as described in the "Waivers and Amendments of the Code" section of this Code. In addition, employees should report suspected conflicts of interest involving other employees.

*See Conflict of Interest Policy.*



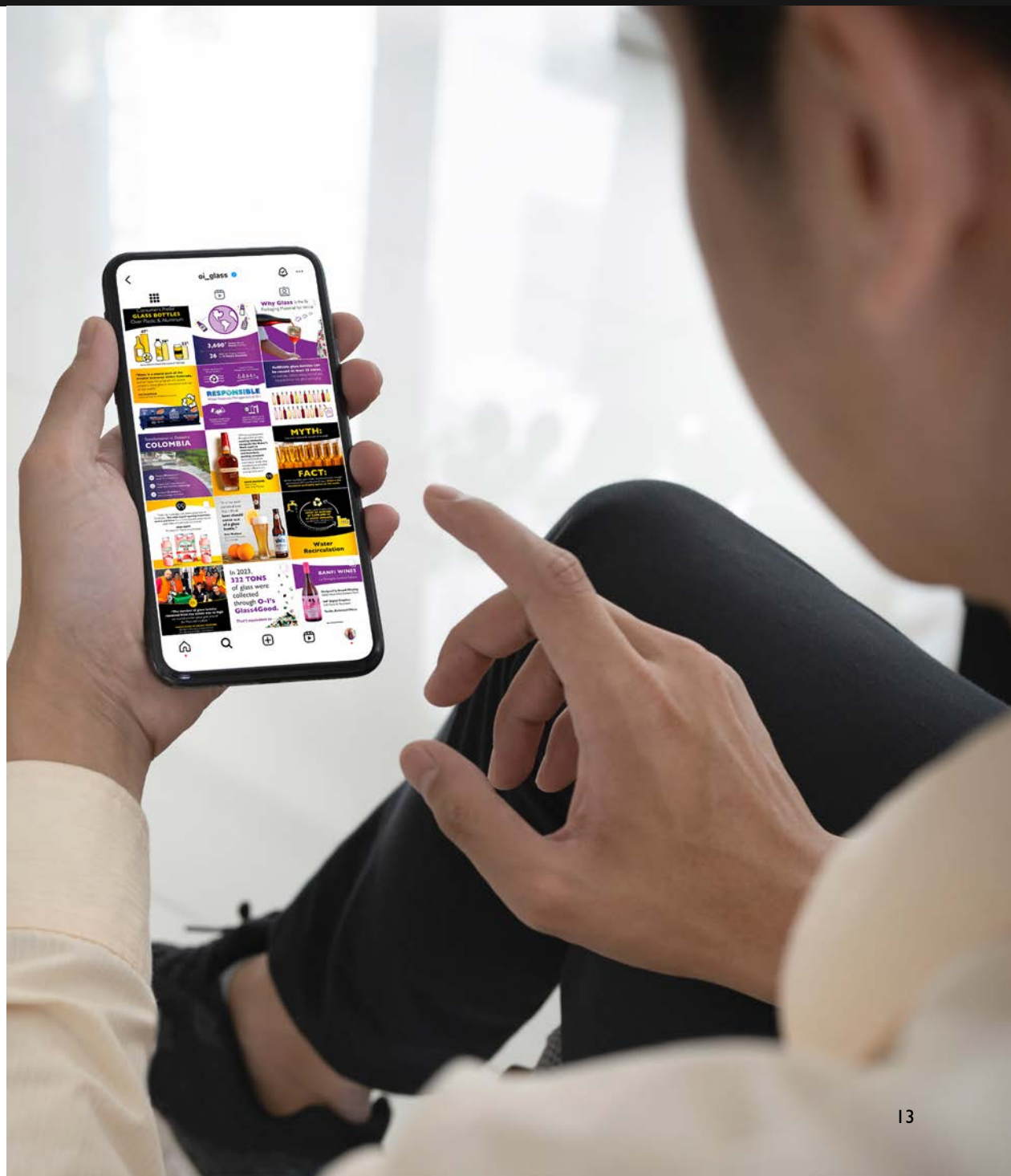
## Communicating with the Public, Including Through Social Media

**Only persons who are authorized to do so should speak on behalf of O-I.** All requests from investors, analysts and the media should be referred to O-I's Corporate Communications or Investor Relations departments. Regional/local members of O-I's communications team can help identify the appropriate persons to contact.

Designated employees participate in social media in support of O-I's business strategies. This includes Company- sponsored social media, as well as O-I's participation in various external websites.

Whether employees choose to participate in social media is each employee's personal decision, with each employee personally responsible for his or her social media communications. O-I has a Social Media Policy intended to help employees understand issues unique to social media and to comply with O-I's policies and the law. The Social Media Policy will not be construed or applied in a manner that improperly interferes with employees' rights to engage in concerted activity or discuss wages, hours or other conditions of employment.

*See Social Media Policy.*





## Anti-Corruption and Anti-Bribery

O-I's commitment to comply with the laws of the countries in which it operates includes compliance with all applicable anti-corruption laws, such as the U.S. Foreign Corrupt Practices Act ("FCPA") and the U.K. Bribery Act.

As part of O-I's commitment to ethical business practices, **O-I will not tolerate bribery or corruption.** This zero tolerance extends to all of O-I's officers, employees, agents and consultants, and those with whom O-I does business.

The policy applies to all interactions between O-I and any other party, regardless of whether it is between O-I and a private entity or O-I and a government official. Government officials may include personnel of government-owned or controlled entities who are engaged in ordinary commercial activities.

The FCPA, U.K. Bribery Act and O-I policy prohibit O-I employees from making or offering bribes, payments or anything of value to obtain or retain business or any other improper business advantage. "Anything of value" includes cash, gifts, meals, entertainment and services.

Gifts, meals and entertainment may only be provided when there is no intent to improperly obtain or retain business or other business advantage. Gifts, meals and entertainment must be provided in accordance with O-I's policy as described in this Code.

The Company may be held liable for bribes paid by a third party agent or consultant acting on the Company's behalf. Employees must carefully select such representatives, particularly someone who might interact with the government on behalf of the Company. O-I policy requires employees to perform appropriate due diligence and monitoring of agents, consultants and other business partners before and while doing business with them. Procedures for due diligence in selecting and retaining business partners have been established and can be found on O-I Dash.

## Facilitating Payments

"Facilitating payments" are small sums paid to government officials to expedite or facilitate non-discretionary actions or services, such as obtaining an ordinary license or phone service. While facilitating payments are legal under the U.S. FCPA and in certain other countries, such payments are illegal in most countries around the world. Therefore, O-I prohibits employees and anyone acting on behalf of O-I from making facilitating payments.

Because violation of these laws and regulations can result in significant criminal and/or civil penalties for both O-I and the individuals involved, **it is critical to act in a manner that avoids even the appearance of a potential violation.** Any violation of O-I's policy may result in disciplinary action, up to and including termination of employment.

See Anti-Corruption Policy







## Gifts and Entertainment

In many industries and countries, gifts and entertainment are used to strengthen business relationships. However, these business courtesies, whether given or received by O-I employees, must never improperly influence business decisions.

### **PROVIDING**

Gifts or entertainment may be provided if they are reasonable complements to business relationships. Gifts, business meals or entertainment may not exceed \$200USD in value in the case of business partners (\$50USD in value in the case of government officials), unless approved in advance in accordance with the Anti-Corruption Policy. This limit applies individually or cumulatively in any calendar year with respect to an individual. No gift or entertainment may be provided that is against the law or the policy of the recipient's company. Employees should consult O-I's policy, the Chief Ethics and Compliance Officer or the Legal Department for guidance. **Offering or providing bribes or kickbacks is prohibited in all circumstances.**

Special care must be taken when providing gifts and entertainment to officials or employees of governments or government-owned or controlled enterprises. When providing gifts or entertainment to government officials or employees of government-owned or controlled enterprises, you are required to abide by local law and O-I's Anti-Corruption Policy. Consult with the Chief Ethics and Compliance Officer or his or her designee or a member of the Legal Department if you have any questions regarding gifts or entertainment provided to government officials.

### **ACCEPTING**

Accepting occasional and modest gifts and entertainment may be appropriate in developing business relationships. Gifts and entertainment should further the business interests of the Company, and not be lavish or in excess of the generally accepted business practices of one's country and industry.

**Employees may not accept gifts or entertainment valued at more than \$200USD individually or cumulatively in any calendar year**

**from the same company.** Acceptance of gifts or entertainment that exceed the \$200USD limit requires pre-approval. The limit is \$50USD in the case of gifts or entertainment from government officials. This would include business meals, sporting events, golf, travel and accommodations, concerts, etc.

Requesting or soliciting personal gifts, favors or entertainment is unacceptable. Also, accepting gifts of cash or cash equivalents such as gift cards is never acceptable. Additionally, employees may not exploit their position to solicit vendors, including financial institutions, to provide individual preferential treatment in pricing, terms, or loans.

Recipients of prohibited gifts or favors should let their manager know and return the gift with a letter explaining O-I's policy. If a gift is perishable or impractical to return (including the situation where returning it would cause embarrassment), management should distribute it to employees or donate it to charity, with a letter of explanation sent to the donor.

### **LOCAL POLICY**

Any business unit or functional area may adopt lower limits, taking into consideration local standards and customs, and also may impose additional reporting requirements.





## Gifts and Entertainment Guidelines

### ACCEPTABLE

- ✓ **Promotional items** such as merchandise with O-I Logo.
- ✓ **Tokens or mementos from another organization** (for example mass produced sponsorship materials such as caps, pens, etc.).
- ✓ **Gift baskets** of nominal value.
- ✓ Candies, cookies, fruit and other **food items of nominal value**.
- ✓ **Small amounts of hospitality of nominal value** such as coffee, doughnuts, soft drinks and similar refreshments in connection with business meetings.
- ✓ **Meals and entertainment with a customer or vendor that has a business purpose**, is customary within the marketplace and is not considered lavish or extravagant.

### NOT ACCEPTABLE

- ✗ **Money or other cash equivalents** such as supermarket and other gift cards.
- ✗ **Gifts that violate applicable laws**, regulations or agreements with third parties.
- ✗ **Business gifts, entertainment or anything of value to government employees** (unless it is clear that applicable laws and regulations permit it and prior approval has been obtained from Company management and the Legal Department if the value exceeds \$50USD).
- ✗ **Frequent or large quantities** of business gifts or entertainment.
- ✗ Business gifts, entertainment or anything of value that would be considered **lavish, extravagant or not customary** within the marketplace.
- ✗ Gifts that influence or give the appearance of **influencing a person's business judgment**.
- ✗ Offering a gift if you know it would **violate the recipient's policy** to accept it.
- ✗ Entertainment, such as tickets to a sporting event, where a representative of the company offering the gift **will not be accompanying the recipient** to the event.
- ✗ **Gifts that could not withstand public scrutiny** without damaging the Company's reputation.



## Political Activity

O-I respects the rights of individual employees to engage in political activity. However, Company funds, resources or time may not be utilized directly or indirectly by an employee for such political activity. **While involved in such political activity, employees must make clear that their views and actions are their own, and not those of O-I.**

To the extent permitted under local laws and regulations, any Company funds, facilities, or services that are intended to support the democratic process in any country must be approved by management in accordance with the Company's global authorization process and properly recorded in O-I's books and records.

## Government Requests

**O-I cooperates with every reasonable request from government agencies and authorities.** O-I is entitled to all of the safeguards provided by law to a person being investigated, including representation by legal counsel from the very beginning of an investigation. All requests from government agencies and authorities for information other than what is provided on a routine basis should therefore be reported to the Legal Department immediately, and the Legal Department's guidance should be received before responding to any such request.

All information provided should be truthful and accurate.

No employee should ever mislead any investigator, and no employee should ever alter or destroy documents or records in response to an investigation.





# What Would You Do?



I recently went to dinner with a fellow O-I employee and a customer. The customer was making jokes with sexual overtones and commented several times on my coworker's appearance. While she brushed off the comments, I was very uncomfortable. **Should I do anything?**



Yes. The actions of the customer may be considered sexual harassment and should be reported immediately. O-I's Non-discrimination/Non-harassment Policy prohibits verbal or physical conduct of a sexual nature. Our policy applies equally to all employees and to anyone who wishes to do business with O-I including customers. It also applies to both work-related settings and to activities outside the workplace (including posts made on social media). You should ask your coworker to report the situation. If she does not, you should report it to your manager, another manager, Human Resources, the Legal Department, the Ethics and Compliance Office, or the Ethics and Compliance Helpline.



My supervisor and several of my colleagues tell jokes that I think are inappropriate and that I find offensive. **What should I do?**



Offensive jokes, even in private conversations that may be overheard by others, can be a form of harassment. Talk to your supervisor about how you feel. If you are uncomfortable talking directly to your supervisor, talk to another manager or someone in Human Resources, the Legal Department or the Ethics and Compliance Office. If you are not comfortable with these options, you may contact O-I's Ethics and Compliance Helpline.



I think one of my coworkers is being harassed because of her age. **Her supervisor is aware of the situation** but is not doing anything about it.



If the supervisor is aware of the situation but is not addressing it, talk to a Human Resources representative, another manager, the Legal Department or the Ethics and Compliance Office. If you are not comfortable with these options, you may contact O-I's Ethics and Compliance Helpline.



My manager has asked me to record an unconfirmed sale in the quarterly report to meet our targets. But the sale will not be completed until after the quarter ends. **Should I do what my manager asks?**



No. You must always record costs and revenues in the correct time period. Reporting a sale that is not yet complete would be a misrepresentation. You need to discuss your concern with your manager. If you are not comfortable with his or her approach, seek help from the Finance/Accounting Department, the Legal Department, the Ethics and Compliance Office or the Ethics and Compliance Helpline.



I'm the logistics manager at our manufacturing location. I know that my brother's company can provide transportation services to O-I at a much lower cost than our current provider. **Shouldn't I try to get O-I a better deal, even if the new company is owned by my brother?**



All O-I employees must follow our company's sourcing and procurement procedures for engaging a new supplier. It may be possible to do business with your brother's company, but only if the procedures are properly followed. You must also disclose your family relationship and remove yourself from all negotiations. It's important that all of our business dealings be fair. All employees must avoid even the appearance of impropriety, and doing business with our family members can be interpreted as favoritism.



One of our suppliers has recently begun to deliver subpar product. However, our purchasing manager has not done anything about it because the supplier gives him one percent of all sales "under the table." **Should I say something?**



Speak up. The manager's behavior, as well his relationship with the supplier, is improper and against O-I policy. Receiving a "kickback," or accepting any personal benefit from a third party in exchange for favorable treatment, is a violation of the Code of Conduct and is potentially a violation of the law. You should report it to your supervisor, another manager, Human Resources, the Legal Department, the Ethics and Compliance Office, or the Ethics and Compliance Helpline.



We were recently bidding on a significant supply contract for a customer and were told that the contract would only be awarded to us if the customer could visit our plant in the United States and bring his family for a stop-over at Disney World. Being awarded the contract would mean a lot of money for the company, and the trip expenses would be relatively small by comparison. **Should we do this?**



Whereas the plant visit may be acceptable, the trip to Disney World is not permitted and is a form of bribery. Under no circumstances should we pay for a customer's family members to travel with him or her, or for a trip to Disney World or any other destination unrelated to O-I business.



## Driving Productivity, Continuous Improvement and Sustainability

### **Intent: Reduce waste and wasted effort to zero and deliver increasing year-on-year Economic Profit**

Productivity is not a one-time thing but is focused on continuous improvement. Productivity is the cornerstone of sustainability. The most productive companies are the ones that get the most from their resources and as a result, tend to be more sustainable.

## Sustainability

**We are proud to be one of the world's leading producers of what we believe is the most sustainable packaging:** the glass container. It's made from natural sand, soda ash, limestone and recycled glass. It's infinitely and 100% recyclable. O-I is working towards its vision of being the most sustainable maker of rigid packaging guided by one idea: achieving balance together, by transforming what O-I does. In order to drive further sustainability in its operations, O-I has established various sustainability goals which are publicly available on its website.







## Compliance with Laws

**O-I is committed to conducting its business in a sustainable and ethical manner.** This includes complying with the applicable laws and regulations of the countries and communities in which O-I does business globally. Every O-I employee has an obligation to comply with all applicable laws, rules and regulations. Any case of noncompliance with applicable law may subject an employee to possible disciplinary action.

If an employee has any doubt about whether a course of action is lawful, he or she should seek advice from his or her supervisor, the Legal Department, or the Ethics and Compliance Office.

## Environment

**O-I recognizes its environmental responsibilities and is committed to maintaining facilities** around the world that comply with applicable environmental laws and regulations. O-I strives to continuously improve its environmental performance.

The Company has policies and operating procedures in place in an effort to ensure compliance with applicable environmental laws and regulations and with the permits issued pursuant to these laws. Any known violation or breach of such policies and procedures should be reported to the Legal Department or the appropriate business manager immediately.

Every O-I employee is responsible for contributing to our journey toward minimizing our environmental impact and conserving natural resources. Employees are encouraged to identify opportunities to improve O-I's environmental performance including, for example, conservation, reducing waste through recycling and reducing the amount of water used in the Company's manufacturing processes.

Any known violation or breach of such policies and procedures should be reported immediately to the appropriate business manager, the Global EHS function, the Legal Department, the Ethics and Compliance Office, or the Ethics and Compliance Helpline.



## Relationships with Suppliers

### **The Company deals fairly and honestly with its suppliers.**

This means that O-I's relationships with suppliers are based on price, quality, service and reputation, among other factors. Employees dealing with suppliers must maintain their objectivity and independent judgment. Specifically, no employee should accept or solicit any personal benefit from a supplier or potential supplier that might compromise an objective assessment of the supplier's products and prices. Employees can give or accept gifts, meals, entertainment, etc., within the limits and per the procedures set forth in the Company's policies.

O-I's Supplier Guiding Principles reinforce O-I's expectations that its suppliers will conduct their respective businesses in compliance with applicable laws and in accordance with high ethical standards.

See *Anti-Corruption Policy*; *Conflict of Interest Policy*; and *Supplier Guiding Principles*.

## Community Commitment

O-I values its contributions to the communities in which it operates.

**O-I encourages employees to be actively involved in the improvement of the communities in which employees live and work.** The financial support provided by the Company and the voluntary charitable leadership offered by thousands of O-I employees around the world demonstrate this commitment.

## 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. Any suspected violations should be reported immediately to your supervisor, another manager, Human Resources, the Legal Department, the Ethics and Compliance Office, or the Ethics and Compliance Helpline.







## Trade Compliance

O-I is committed to compliance with all applicable international trade laws and regulations, including those governing the import and export of goods, software, technology, technical data and services across national borders, and those regarding embargoes, boycotts and other economic sanctions. Furthermore, international trade controls may apply to any import or export activity, including the transmission of electronic data or providing a foreign national access to export restricted information within the U.S.

Various government economic sanctions can restrict O-I from engaging in trade with certain countries, entities and persons. For example, the U.S. maintains sanctions programs that restrict or prohibit activities with or involving particular countries and/or territories. Please refer to O-I's Global Trade Controls Policy for the current list of such sanctioned countries and/or territories. O-I is also subject to the anti-boycott provisions of U.S. law that prohibit companies from participating in an international boycott that is not approved or sanctioned by the U.S.

As a U.S.-based multinational, in addition to the U.S. trade laws and regulations, O-I is required to comply with certain trade laws of foreign jurisdictions in which it conducts business. International trade laws and regulations are complex. **Any employee with questions or concerns regarding these laws or related international trade issues must consult with the Legal Department or the Ethics and Compliance Office before engaging in any activity that may be in violation of such laws.**

*See Global Trade Controls Policy.*

## Anti-Money Laundering

O-I complies with all applicable laws that prohibit money laundering. "Money laundering" is the process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate. O-I employees are encouraged to be vigilant for financial transactions that might signal a problem, and to report any concerns if they see or suspect an activity or transaction that is outside of the typical process. Report to your supervisor, another manager, Human Resources, the Legal Department, the Ethics and Compliance Office, or the Ethics and Compliance Helpline.







# What Would You Do?



Various economic sanctions imposed by the U.S., the EU and other jurisdictions can restrict companies from engaging in trade with certain countries, entities and persons. **If an employee has questions or concerns regarding these laws, who should they consult within the Company before engaging in any activity that may be in violation of such laws?**



International trade laws and regulations are complex. Any employee with questions or concerns regarding these laws or related international trade issues must consult with the Legal Department or the Ethics and Compliance Office before engaging in any activity that may be in violation of such laws. An employee may also choose to make a report to the Ethics and Compliance Helpline.



As part of O-I's reporting on sustainability related matters, I have been asked to produce certain non-financial data relating to my department. **As it is not financial data, how important is it to be accurate?**



It is important to be accurate whether you are providing financial data or non-financial data. Sustainability disclosures are subject to various laws and regulations which will continue to evolve. It is important for O-I to comply with all applicable laws and regulations regarding disclosures relating to sustainability matters.



I have been meeting with a supplier which is based in a developing country to assess if O-I can work with them. The representative of the company has guaranteed the lowest prices because the cost structure is so low. The prices being quoted are much lower than I expected, and I am curious as to how the prices can be so low. When I ask if someone can visit the facility or if they have any photos of the factory, the representative pushes back. **Should I report this?**



Yes. It is important to report the concern to your supervisor, another manager, Human Resources, the Legal Department, the Ethics and Compliance Office, or the Ethics and Compliance Helpline. These could be signs of human trafficking and modern slavery. O-I does not do business with any entity that uses forced labor and/or child labor.



A potential customer has contacted my department to purchase glass bottles. They insist on paying cash and do not want any documentation of the transaction. **Should we proceed with the transaction?**



No, the request to pay in cash and not to document the transaction could be red flags with respect to money laundering. You should report this to your supervisor, another manager, Human Resources, the Legal Department, the Ethics and Compliance Office, or the Ethics and Compliance Helpline.



## Building **Shared Value** with Our Customers

### **Intent: Building mutually profitable working relationships with customers**

O-I seeks to build mutually profitable working relationships with its customers. This includes providing safe, quality products and dealing with our customers fairly, honestly, and with integrity. It also includes being committed to free and open competition in the marketplace as well as compliance with all applicable antitrust and competition laws.

### **Product Quality and Safety**

O-I is committed to providing safe, quality products to our customers. O-I is also committed to compliance with all laws and regulations relating to product safety including any product safety reporting responsibilities under applicable laws such as the U.S. Consumer Product Safety Act or its equivalent in other jurisdictions. We are committed to compliance with internal quality and safety procedures, as well as mutually agreed customer quality standards.

### **Competition and Fair Dealing**

All employees should strive to **deal fairly with each other and with the Company's customers, suppliers and competitors.** Employees should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.







## Relationships with Customers

O-I's business success depends upon the Company's ability to maintain lasting customer relationships. **The Company is committed to dealing with customers fairly, honestly and with integrity and seeks to build mutually profitable working relationships with customers.** The information O-I supplies to customers should be accurate to the best knowledge of O-I's employees. This includes any certifications of compliance with quality control specifications, test procedures and test data. Employees should not deliberately misrepresent information to customers.

One category of customers are distributors which are independent customers who buy and sell for their own account. They are not Company representatives, agents, brokers or franchisees. Although many of the key principles of competition law are common in countries across the world, local laws in some countries introduce additional rules. For example, when dealing with distributors in the EU, employees need to be aware of the prohibition on parallel trade restrictions.

## Relationship with Competitors

The Company is committed to free and open competition in the marketplace. **Employees should avoid actions that would be contrary to laws governing competitive practices in the marketplace, including antitrust and competition laws.** Such actions include misappropriation or misuse of a competitor's confidential information or making false statements about the competitor's business and business practices.

*See Antitrust and Competition Law Compliance Policy and Guide.*





## Antitrust and Competition Law

The antitrust and competition laws of the U.S., the European Union and many other countries where O-I does business require companies to compete independently in the marketplace. O-I fully supports the purpose of the antitrust and competition laws which is to promote fair and open competition and to protect companies and consumers from illegal anti-competitive practices such as price-fixing, market allocation and bid-rigging.

Price fixing is one of the most serious forms of unlawful conduct under antitrust and competition laws. It refers to any agreement or understanding between competitors with respect to the price, or any element of a price, to be paid to or charged to third parties. Price fixing also includes any arrangement between competitors that tends to stabilize prices or eliminate competition with respect to other sales terms and conditions, such as freight charges, credit terms, lead times or inventory reserves.

The Company will not tolerate price fixing or any other activity that could be construed as price fixing. On the contrary, O-I must compete vigorously on the basis of price, quality and service, and the Company's conduct must be based on its independent and unilateral business judgment.

**All O-I employees must avoid any communications, whether direct or indirect, involving competitors, customers or suppliers that suggests any form of illegal agreement, understanding or arrangement may exist or may be under consideration.**

In addition to price fixing agreements, other forms of unlawful conduct include market allocation (of, for example, customers, markets, products or territories), price discrimination, monopolization, predatory pricing and group boycotts.

**O-I employees are responsible for complying with both the letter and the spirit of antitrust and competition laws.** This responsibility includes reporting any potentially illegal or suspicious conduct to your supervisor, another manager, Human Resources, the Legal Department, the Ethics and Compliance Office, or the Ethics and Compliance Helpline. The consequences for violating these laws can be severe for the companies committing the violations (significant fines, monetary damages, reputational impact) and, in some jurisdictions like the U.S., for the individual employees committing the violations (personal fines, prison terms, as well as termination of employment).

*See Antitrust and Competition Law Compliance Policy and Guide.*





## Participation in Trade Associations

Joining a trade association or attending trade association meetings is legal under antitrust and competition laws. However, whenever there is a gathering of competitors, there is a risk that the resulting discussions might lead to antitrust violations. **Even the appearance of anticompetitive behavior at such events could lead to a criminal investigation.**

Under O-I's Antitrust and Competition Law Compliance Policy and Guide, managers must consult with the Legal Department before joining any trade association or before participating in any new program that involves submission of Company statistics or other information to a trade association. All employees attending meetings of trade associations or trade shows are required to submit the compliance report described in the Policy. This includes attending meetings at trade associations like the Glass Packaging Institute and the European Container Glass Federation, as well as trade shows like drinktec.

**O-I employees are encouraged to participate in trade associations as they are valuable for networking and knowledge sharing.** However, if an O-I employee is in a situation where a competitor raises a competitive topic, even casually, the employee must avoid even the appearance of violating the competition laws by:

- ✓ Ending the conversation immediately.
- ✓ Telling the other members of the conversation that this topic will not be discussed.
- ✓ The employee must excuse themselves immediately and make their departure obvious. This is referred to as a **“noisy exit.”** The employee must then immediately report the incident to the O-I Legal Department or the Ethics and Compliance Office..

## Competitive Information

**Competitive information must be gathered legally and ethically.**

It is illegal to disclose to or obtain from competitors competitively sensitive nonpublic information such as the following: pricing (especially future or projected pricing), changes to terms and conditions, anticipated responses to bid requests (including a decision not to bid), new product or research and development plans and current or future business or strategic plans.

It is legal to obtain competitive information from customers or suppliers who do not have a duty of confidentiality to the competitors. In such circumstances, you should document the source of the information and the date it was obtained. However, it is illegal to use customers or suppliers as a conduit to communicate information to or from competitors.





# What Would You Do?



I observe a peer repeatedly fail to properly follow held ware procedures and know this would lead to KPI (Key Performance Indicator) metrics being incorrectly reported for the plant. **Should I report my suspicion?**



Yes, report it to your supervisor, another manager, Human Resources, the Legal Department, the Ethics and Compliance Office, or the Ethics and Compliance Helpline. KPI metrics are used to report the health of the plant to the organization. It is critical that this data is correct so the Company can make appropriate decisions related to each plant.



A large international customer is conducting a quality systems audit in one of our plants. Many of the questions appear to be asking about information O-I considers proprietary. **What do I do?**



Contact your plant or country group quality leader for guidance before answering these questions. A common source of proprietary information leaving the company is through customer audits. In most cases a mutually agreed quality agreement is in place and dictates the information that can safely be shared. Anything outside of this agreement is not typically shared, even when a customer is asking for it through an audit.



I am visiting a customer and our competitors are on site as well. **Can I talk with them?**



Conversations with competitors are not forbidden, but care should be taken with the conversation topics. Remember we must avoid even the appearance of impropriety to avoid anti-trust issues such as pricing, profits, inventory levels, standards, and technology.



I am attending a trade association meeting and several members are discussing pricing strategy. **What should I do?**



If issues such as pricing strategy are discussed among competitors, there is a possibility that price-fixing or collusion could occur or be perceived to have occurred. Many countries prohibit the discussion of pricing among competitors for this reason. If you find yourself in this situation, you must excuse yourself from the meeting immediately and make your departure obvious. This is called a noisy exit. Promptly advise the Legal Department or the Ethics and Compliance Office of what you observed.





## Strengthening Leadership Through the Business

### **Intent: Empower people to find the best way to deliver Economic Profit with the right behaviors**

O-I's business performance depends on the caliber and strength of our people. O-I employees are expected to do the right thing in the right way every day. Employees must hold themselves and each other accountable for acting with integrity.

### **Responsibilities as Employees**

Each O-I employee is expected to understand and comply with this Code, O-I's policies and with all applicable laws, rules and regulations. This responsibility includes:

- Understand and comply with those laws, rules and regulations and O-I policies that apply to the employee's job role.
- Act and make decisions consistent with the Operating Principles and the Company's high standards of ethical conduct.
- Promptly complete ethics and compliance training when assigned by the Company and certify their compliance with the Code at the Company's request.
- Provide full, accurate, timely, and clear information at all times.
- Seek help and guidance when they have questions or are unsure of the right thing to do.
- Immediately report actual or suspected violations of the Code, Company policies or the law to his or her supervisor, another manager, Human Resources, the Legal Department, the Ethics and Compliance Office, or the Ethics and Compliance Helpline.
- Cooperate fully with any investigation by the Company of actual or suspected violations of laws, this Code or O-I policies.

Employees who violate applicable laws or regulations, this Code or Company policies, or encourage others to do so, put the Company's reputation at risk. No reason, including the desire to meet business goals, can ever be an excuse for violating laws, regulations, this Code or Company policies.



## Additional Responsibilities as Managers

**Managers including any O-I employees who supervise others are expected to fulfill additional responsibilities including the following:**

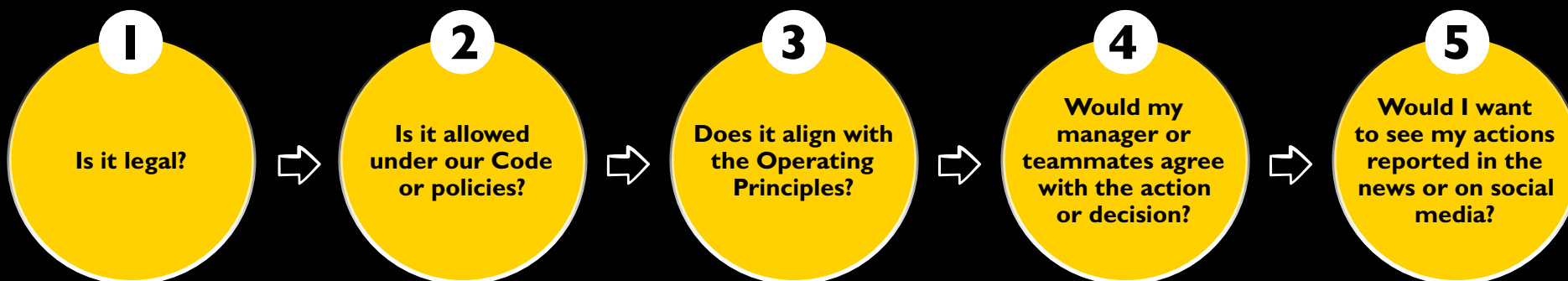
- Be role models for the highest standards of ethical conduct.
- Create and sustain a workplace culture in which employees know that legal and ethical behavior is expected of them.
- Maintain an inclusive work environment where constructive and open discussions, including good faith reports of violations, are encouraged and expected, without fear of retaliation.
- Ensure that employees are aware of, understand, and know how to apply this Code, O-I's policies and applicable laws and regulations in their daily work. This would include ensuring that employees receive appropriate training as needed.
- Remind employees that how we achieve our results is just as important as the results themselves.
- Be diligent in looking for indications that unethical or illegal conduct is being considered or has occurred. Hold everyone accountable for ethical behavior.
- Take appropriate action to address any situations that seem to be in conflict with the law, this Code or O-I policies.
- Seek assistance from Human Resources, other managers, the Legal Department or the Ethics and Compliance Office, as appropriate depending on the issue.



## Ethical Decision Making:

### Making the Right Decisions

Making ethical decisions and taking the right actions are essential to O-I's success, but there may be times when the best approach to a situation is not always clear or easy. Making smart, ethical choices is part of working at O-I. If you are faced with a situation or ethical dilemma where the right approach is not clear, ask yourself the following questions:



If your answer is “NO” or “I’M NOT SURE” to any of the above questions, it is important to immediately seek help and guidance before taking action. Talk to a supervisor or any other resources identified in this Code including Human Resources, the Legal Department and the Ethics and Compliance Office. You may also contact the Ethics and Compliance Helpline.



**Making the right decisions is how we win at O-I.** Using this Code as a roadmap will help you every step of the way. Whether you are unsure of how to handle a difficult situation or simply need more information on a Company policy, our Code is here to guide you.





## Reporting Code of Conduct Violations and Other Ethical Issues

**Each O-I employee has a responsibility to immediately report actual or suspected violations of laws, this Code or O-I policies.** This includes situations where the employee has violated or thinks they have violated the law, this Code or O-I policies or where the employee has observed, learned of or in good faith suspects that another person has violated any of these. Failing to promptly report known violations by others may be a violation of this Code.

If an employee sees something, they should say something – as soon as possible. For example, this may include actual or suspected safety or environmental violations; suspected fraud, theft, or bribery; or possible discrimination or harassment including sexual harassment. It is always best to raise concerns early so that the Company can address them.

Employees are encouraged to raise such concerns first with their immediate supervisor if they are comfortable doing that. This may provide valuable insights or perspectives and encourage prompt local resolution of problems.

However, an employee may not be comfortable bringing the matter up with their immediate supervisor, or they may not believe that their supervisor has dealt with the matter promptly. In those situations, an employee should raise the matter, depending on the nature of the issue, with:

- A Human Resources representative
- Another member of management
- The Legal Department
- The Ethics and Compliance Office

Employees can also report using the Ethics and Compliance Helpline.

Employees are required to cooperate fully with any investigation by the Company of actual or suspected violations of laws, this Code or O-I policies. Employees must provide relevant documents, communications and other information to investigators. Employees must be truthful in their responses and should never mislead any investigator. Failing to cooperate in an investigation of a possible violation may result in disciplinary action.

**Making a “good faith” report** simply means that you have provided all of the information you have and you believe it to be true. You should feel comfortable knowing that you will not get in trouble if you report a suspected violation of this Code in good faith – even if your concerns turn out to be unfounded.



## What will O-I do when it receives a report through the **Ethics and Compliance Helpline**?

**Speak  
UP!**



### **Step 1: Report a concern or question.**

You can report a concern or question to O-I's Ethics and Compliance Helpline. The Helpline is operated by an independent third-party. If reporting anonymously, please see the footnote below.



### **Step 2: Assessment of the Report**

All matters are reviewed by the Ethics and Compliance Office which assigns each matter to a designated investigator, which might include HR, Legal, Compliance & Ethics, Internal Audit, or Global Security.



### **Step 3: Investigation**

The investigations may involve interviews of employees or third parties, review of business records, and analysis of processes. If you provide your contact information, the investigator might contact you for more information.



### **Step 4: Determination of the Outcome**

At the end of the investigation, the investigation team provides their findings to management. Management reviews the investigation findings and determines any remediation or disciplinary actions as warranted.



### **Step 5: Closing the Case**

The investigation is closed. The results are tracked and reported internally. At the conclusion of an investigation, appropriate action will be taken as determined by management. In order to maintain confidentiality of the process and participants, we will not be able to share details about the investigation and resolution.

NOTE: If you choose to report anonymously, please provide as much detail as possible. Anonymous reporters: Use the "report key" and password to check for updates and communicate anonymously with O-I. You can also submit your email address to the Helpline to receive email alerts when O-I posts information or asks a question through the Helpline, and this email address is not shared with O-I.



## Retaliation Prohibited

**O-I prohibits retaliation against an employee who, in good faith, seeks help or reports actual or suspected violations of laws, regulations, this Code or Company policies.** No O-I manager may retaliate against, or allow retaliation against, any employee or person who in good faith makes such a report. Any retaliation against an employee who makes a good faith report will be subject to disciplinary action, including potential termination of employment. Additionally, employees who knowingly submit false reports also will be subject to disciplinary action.



### EXAMPLES OF RETALIATION

Retaliation can take many forms. Examples of situations where retaliation can arise include, but are not limited to:

- Firing or laying off
- Demoting or disciplining
- Denying benefits, overtime or promotion
- Intimidation, threats or harassment
- Failing to hire or rehire
- Reassigning work responsibilities
- Reducing pay or hours
- Intentionally excluding someone from company activities or acting in a way that negatively impacts that person's work environment





# What Would You Do?



It seems like our manager does nothing when we bring up to her our concerns about possible misconduct. I think she has made things difficult for coworkers who have raised issues. Now I have a problem: a coworker is doing something that I believe to be ethically wrong. **What should I do?**



Speak up. Our Code says that you should report misconduct and that you can do so without fear of retaliation for good faith reporting. Starting with your direct supervisor is often the best way to address concerns. However, if you do not believe that would be appropriate or that your manager will help, you should talk to another member of management, Human Resources, the Legal Department or the Ethics and Compliance Office.

*You may also use the Ethics and Compliance Helpline.*



My department sets goals that we are supposed to achieve. In the past, I have felt pressured by my supervisor to directly violate the Code and Company policies to achieve these goals. **Is this acceptable?**



No. While successful businesses often set high goals and strive to achieve them, you should never violate the Code or O-I policies to achieve any goals. Talk to your supervisor, another member of management, Human Resources, the Legal Department, or the Ethics and Compliance Office.

*You may also use the Ethics and Compliance Helpline.*



## Using **Economic Profit** to Drive Our Value Creation

### **Intent: Embed Economic Profit as the only true measure of value creation in all we do**

Economic Profit reflects the twin engines of productivity gains and profitable growth. In order to achieve this, employees must protect the Company's assets including physical assets, intellectual property, confidential information, and digital assets. Employees must comply with laws that prevent insider trading. Employees must not engage in fraudulent activities including submitting false or misleading expense reports.

### **Protection and Use of Company Assets**

Employees have a responsibility to protect the Company's assets and to ensure their efficient use for legitimate business purposes only. The use of Company funds or assets, whether or not for personal gain, for any unlawful or improper purpose is prohibited. Employees should be aware that Company property includes all data and communications transmitted to or received by, or contained in, the Company's electronic or telephonic systems. Company property also includes all written communications.





**To ensure the protection and proper use of the Company's assets, each employee should:**

- Exercise reasonable care to prevent theft, damage or misuse of Company property.
- Report the actual or suspected theft, damage or misuse of Company property to a supervisor, Human Resources, the Legal Department, the Ethics and Compliance Office, or the Ethics and Compliance Helpline.
- Safeguard all electronic programs, data, communications and written materials from inappropriate access by others.
- Use Company property only for legitimate business purposes, as authorized, in connection with the employee's job responsibilities.
- Avoid conflicts of interest such as financial, business or other relationships which are, might be, or even appear to be opposed to the interests of the Company or cause a conflict of the performance of an employee's duties.
- Be honest, truthful, and transparent in all dealings on behalf of the Company.

## Intellectual Property

Intellectual property is a class of intangible property that includes patents, trademarks, copyrights, and trade secrets.

**Intellectual property is critical to the Company's success; it allows the Company to (i) maximize the return on its investments, (ii) enhance its competitive position in the marketplace, and (iii) create shareholder value.**

The Company observes all applicable laws and regulations governing intellectual property and respects the intellectual property rights of others. All employees need to be aware of intellectual property and its importance to the Company.





➔ **Be aware of the Company's intellectual property.** The Company maintains intellectual property assets all over the world that may be leveraged to acquire business, distinguish the Company's products and services from those of our competitors, protect the Company's reputation and goodwill, and enable the Company to operate with a competitive advantage in the marketplace. Know our intellectual property and understand how it impacts the Company's value, business opportunities, and performance.

➔ **Identify, disclose, and secure intellectual property.** All employees – not just engineering and research and development personnel – may create intellectual property for the Company. Creations such as inventions, designs, brand names, slogans, artwork, music, and software code are all candidates for intellectual property protection. Employees should timely document the creation of intellectual property on an approved Company form and submit the completed form to the Legal Department for assessment.

➔ **Treat intellectual property as confidential information.** Many forms of intellectual property are considered confidential information. Treat all intellectual property as confidential, especially trade secrets and inventions that are not yet patented, unless you are sure the intellectual property is publicly accessible. Public disclosures of intellectual property, even if accidental, can result in the forfeiture of intellectual property rights.

➔ **Do not forget about intellectual property when working with third parties.** We often collaborate with third parties to conduct Company business. It is not uncommon for intellectual property to be created jointly with a third party or solely by a third party at the direction of the Company. The ownership of intellectual property rights is negotiable and should be addressed early when working with a third party.

➔ **Report intellectual property concerns.** If you suspect the Company's intellectual property is being used without permission, or if you have questions about the Company's intellectual property

rights or the intellectual property rights of another, contact the Legal Department or the Ethics and Compliance Office immediately. Promptly relaying concerns can make a difference. Do not make your own judgments concerning the Company's or another's intellectual property rights.

➔ **Do not permit others to use our intellectual property.** Unless authorized, do not grant permission to a third party to use any of the Company's intellectual property – including the Company name or logo – or grant a third party access to the Company's intellectual property. Any requests for permission to use, access, or license the Company's intellectual property must be coordinated through the Legal Department.

## Protect and Preserve O-I's Intellectual Property

✓ **Be aware** of the Company's intellectual property.

✓ Do not forget about intellectual property when working with **third parties**.

✓ **Identify, disclose, and secure** intellectual property.

✓ **Report** intellectual property concerns.

✓ Treat intellectual property as **confidential** information.

✓ **Do not permit others** to use our intellectual property.

The Company has a Global Inventor Award & Remuneration Plan through which individuals may be recognized and rewarded for certain innovations. For more information, contact the Legal Department.



## Confidential Information

Employees may have access to various types of confidential information through the course of their employment. As confidential information includes many of the Company's most valuable assets, safeguarding this information is key to the Company's success and the relationships we build with our vendors, suppliers, and customers. The unauthorized disclosure of confidential information – even if done inadvertently – could competitively harm the Company and/or third parties that entrust us with their confidential information.

We all have a responsibility to **secure and protect confidential information**, even after we leave the Company.



- ✓ **Know your role in protecting confidential information.** Every employee has a duty to understand what constitutes confidential information as well as the competitive value and sensitivity of the information. If in doubt, assume that information is confidential and must be protected unless it can be obtained from a public source such as the Internet.
- ✓ **Keep confidential information secure.** Ensure that confidential information is stored only in Company-authorized locations and the highest degree of confidentiality is maintained. All protocols for restricting unauthorized access to confidential information must be followed and all company devices with access to confidential information should be protected by a strong password that is regularly updated.
- ✓ **Be mindful of possible gaps in security.** Do not use your private computer, mobile device, email, social media, or cloud storage to store or transfer confidential information, and do not allow artificial intelligence (AI) systems to access confidential information unless the AI system is provided by the Company and approved for such access. Do not leave confidential information unattended in a non-secure setting.
- ✓ **Be diligent in how you share confidential information.** Only share confidential information with employees on a need-to-know basis. Do not disclose confidential information outside the Company unless the disclosure is required by law or covered by an agreement such as a confidentiality or non-disclosure agreement. All disclosures of confidential information outside the Company must be authorized.
- ✓ **Keep accurate records of all disclosures.** Designate all confidential information, including oral disclosures, as confidential. For any disclosures of confidential information, keep accurate records of the information disclosed as appropriate under the circumstances.
- ✓ **Respect others' confidential information.** Identify and understand third-party confidential information that is shared with, and entrusted to the care of, the Company. Be sure to honor the Company's contractual obligations concerning third-party confidential information.



**Confidential information** is all non-public information of the Company that, if disclosed, might be useful to competitors or harmful to the Company. Confidential information may be in the form of a written document, an audio or video recording, or an oral disclosure, and includes not only our own non-public information but also the non-public information of our vendors, suppliers, and customers that has been shared with and entrusted to us.

**Some examples of confidential information include:**

- Business plans, strategies, and non-public financial records
- Commercial information such as customer lists, pricing, and contracts
- Technical information such as operating manuals, manufacturing data, and research and development plans, ideas, and findings
- Sensitive personal information
- Certain intellectual property such as trade secrets (e.g., formulations and manufacturing know-how), draft patent applications, and filed patent applications that have not yet published

For any questions relating to confidential information, including whether the disclosure of confidential information is required by law, please contact the Legal Department.

## Insider Trading

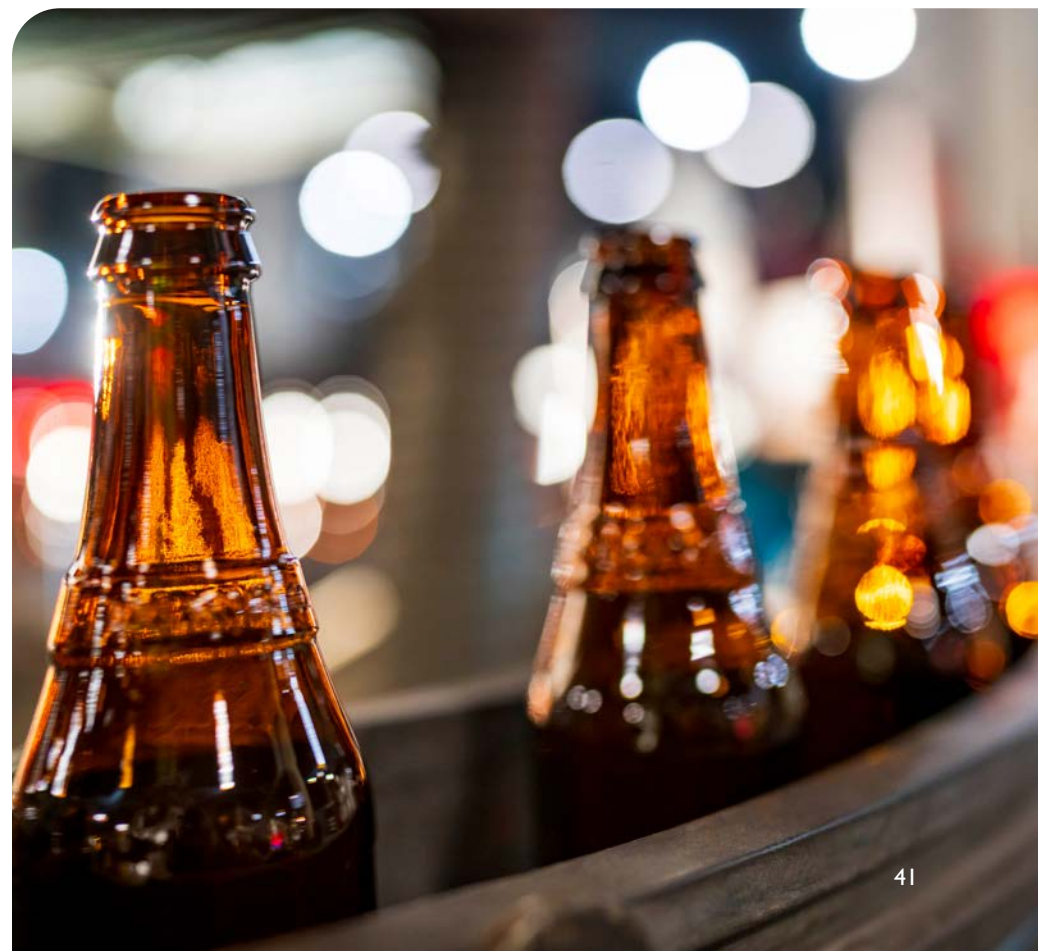
The Company seeks to promote a culture that encourages ethical conduct and a commitment to compliance with the law and requires its directors, officers and employees to comply at all times with federal laws and regulations governing insider trading. The Company's Insider Trading Compliance Policy is designed to help comply with these laws and regulations and restricts employees from using material nonpublic information for their own financial gain or from disclosing such information to others.

Material nonpublic information may take many forms, as it can be any information that is likely to have a significant effect on the market price of a security, such as unpublished financial results or forecasts, operational

plans or strategies, nonpublic information regarding significant corporate acquisitions or dispositions and research or technical programs and innovations.

The Company's Insider Trading Compliance Policy also includes additional requirements, such as prohibitions on certain types of transactions, blackout periods that prevent certain individuals from transacting in Company securities, and pre-clearance requirements for transactions by certain individuals.

*See Insider Trading Compliance Policy.*







## Fraud

O-I does not tolerate fraud by its employees, officers, directors, contractors, or third-party business partners. Fraud occurs when someone lies (or omits information) about a material fact in order to steal money or property. We must report suspected fraud in a timely fashion once it is detected, work towards understanding the fraud's root cause, and remediate the fraud to ensure the misconduct does not happen again.

## Submitting Expense Reports

O-I will reimburse expenses related to business travel and entertainment. The expenses you submit in your expense reports must be reasonable, appropriate and related to O-I's business. It is never appropriate to expense personal items in your expense reports. If you are a manager, you are responsible for making sure expenses submitted by your direct reports are for legitimate business purposes. Take time to carefully review their expense reports. Discuss questionable expenses with them. If you suspect an employee is misrepresenting expenses, contact your supervisor, another manager, Human Resources, the Legal Department, the Ethics and Compliance Office, or the Ethics and Compliance Helpline.

*See Global Travel Policy*

## Corporate Opportunities

Employees have an obligation to advance the Company's interests when the opportunity to do so arises. If an employee discovers or is presented with a business opportunity through the use of Company property, information or because of his or her position with the Company, the employee should first present the business opportunity to the Company before pursuing the opportunity in the employee's individual capacity. No employee may use Company property, information or his or her position with the Company for personal gain or to compete with the Company.



The employee should disclose to their supervisor the terms and conditions of each business opportunity covered by this Code that they wish to pursue. The supervisor will contact the Legal Department and appropriate management to determine whether the Company wishes to pursue the business opportunity. If the Company waives its right to pursue the business opportunity, the employee may pursue the business opportunity on the same terms and conditions as originally proposed and consistent with the other ethical guidelines in this Code.

## Cybersecurity, E-mail Communications and Use of Computer System

The Company has developed and implemented a cybersecurity risk management program intended to protect the confidentiality, integrity, and availability of its critical systems and information.

The Company's cybersecurity risk management program is integrated into its overall enterprise risk management program and shares common methodologies, reporting channels and governance processes that apply across the enterprise risk management program to other legal, compliance, strategic, operational, and financial risk areas.

To provide employees with access to cybersecurity-related information, O-I's cybersecurity function maintains a website on Dash.

Information Technology resources, including access to the internet, electronic mail (e-mail), collaboration tools and any other system, are considered O-I assets and should be used in an appropriate and proper manner, as described in our Information Technology policies. An employee who discovers a violation of these policies and procedures should report it to their supervisor, another manager, Human Resources, the Legal Department, the IT Governance, Risk and Compliance Team, the Ethics and Compliance Office, or the Ethics and Compliance Helpline.

O-I recognizes the importance of providing adequate security measures to protect information created, processed or entrusted to the Company. O-I is committed to the implementation, execution and monitoring of security measures and processes across the enterprise. Security of Company information is everyone's responsibility.

Use of the Company's communications system must be consistent with the Company's policies relating to access to the Internet. The Company expects that employees will use the computer systems, email systems, Internet and electronic storage in an appropriate and proper manner.

### Examples of inappropriate or improper uses include:

- Accessing, creating, storing or transmitting images, websites or other materials that contain:
- Pornographic or sexual content; or
- Offensive material relating to legally protected characteristics which may include age, sex/gender, sexual orientation, religious or political beliefs, national origin, disability or race;
- Using the computer systems or Internet access to violate laws and regulations;
- Knowingly downloading or distributing illegally copied software or data or using software in violation of applicable license or other agreements; or
- Sending or receiving confidential O-I information without prior authorization.

*See the information technology related policies in effect in your region.*







## Artificial Intelligence

O-I's Artificial Intelligence Responsible Use Policy establishes the requirements for use of Artificial Intelligence technologies at O-I.

While the use of Artificial Intelligence has the potential to be highly valuable to O-I, this value can only be realized when the technology is properly vetted and responsibly used.

**First and foremost, O-I Users may ONLY use Artificial Intelligence technologies that have been vetted and approved for use by the O-I AI Steering Committee (the "Committee").** The list of "Approved AI Technologies" is maintained by the Committee and will be available on the Artificial Intelligence page of the Cybersecurity section of DASH.

Even when using Approved AI Technologies, O-I Users should strive to use them in a safe way, taking into consideration legal and ethical standards, and consistent with the following general principles, which are defined in more detail in the Artificial Intelligence Responsible Use Policy:

- Business confidential information, personally identifiable Information, customer data, or other data subject to confidentiality obligations should NOT be input into the prompts of any Approved AI Technologies.
- All outputs created with Approved AI Technologies should be reviewed to confirm their accuracy, quality, suitability, and adherence to O-I standards.

- The output of Approved AI Technologies should be used only for internal O-I purposes.
- Content created with Approved AI Technologies should be documented as such so that other users of that content are aware of its origin.

Further, O-I Users should **not** use Approved AI Technologies, either intentionally or unintentionally, to do any of the following:

- Make decisions, predictions, or evaluations about people without human intervention;
- Generate content for which O-I may seek intellectual property protection;
- Violate intellectual property, contract or other rights of a third party;
- Lead someone to believe they are interacting with a human if they are not;
- Present generated content as "facts;"
- Generate content that is harmful; or
- Disparage, harm, or otherwise place O-I in a negative light.

*For more details and a link for seeking approval of Artificial Intelligence technologies, see the Artificial Intelligence Responsible Use Policy.*







# What Would You Do?



More than once I've walked by a colleague's work area while she was at lunch and noticed confidential drawings of a prototype displayed across her computer monitor. **What should I do?**



Your colleague is making a common mistake. By leaving her workstation open, your colleague runs the risk of losing proprietary information. Speak with her regarding the behavior. If the behavior does not change, speak up and raise the concern with your manager, another manager, Human Resources, the Legal Department, the Ethics and Compliance Office, or the Ethics and Compliance Helpline.



I found a copy of the Company's recent earnings statement in the copy room. It was labeled CONFIDENTIAL: NOT READY FOR DISTRIBUTION across the top of the statement. **What should I do?**



The earnings statement contains sensitive, proprietary information that must be protected. If you think the document has been misplaced, bring the statement to your manager. You should not discuss the information with others within your business or outside of the Company.



You receive an email from the O-I HR Mailbox saying that there was a problem with your benefit information and you need to click the link in the email to review and update that information. After looking closer at the email, you notice the sender is not a normal O-I email address and that the "external" email notification is on the email. **What should you do?**



You should never click on a link sent by an unknown address. If the "external" email notification is on the email and the sender's address does not appear to be an O-I email, you can either click the phishing alert button in your Outlook or contact the Cyber Security Team to review the email.



## Resources / How to Get Help

### Policies

All of the policies specifically referred to in this Code (and other policies that may impact your job) can be found on O-I Dash.

### People

- Your supervisor or manager
- Other members of management
- Human Resources
- Chief Ethics and Compliance Officer
- Legal Department
- Internal Audit
- Finance and Accounting
- Environmental, health and safety coordinators
- Global Security

### O-I Ethics and Compliance Office

The Ethics and Compliance Office is available to answer any questions about the Code or Company compliance-related policies, or to discuss concerns you may have about potential Code violations. When you contact the Ethics and Compliance Office to raise an issue, you may remain anonymous (subject to any local laws), although you are encouraged to identify yourself.

To contact the Ethics and Compliance Office:

- Email: [compliance@o-i.com](mailto:compliance@o-i.com)
- Mail: Chief Ethics and Compliance Officer  
O-I Glass, Inc.  
One Michael Owens Way Plaza One  
Perrysburg, OH 43551 U.S.A.
- Use the Ethics and Compliance Helpline at [www.oietics.com](http://www.oietics.com), or call toll-free using the country numbers that can be found on the website.

### O-I's Ethics and Compliance Helpline – Numbers by Country

Employees can reach the Helpline from anywhere in the world via the Internet. The website is [www.oietics.com](http://www.oietics.com).

The Helpline can also be accessed by phone. Within the U.S. and Canada, callers can dial 1-800-963-6396 toll-free.

To report a concern over the phone, use the toll-free number that has been designated for your country. Call specialists are available 24 hours a day, 365 days a year.

In a number of countries, O-I has set up a dedicated local number that connects directly to the Helpline. If you use this number, you will hear a message in the language designated for the country from which you called. After the message you will be put on hold for a short period of time. Do not hang up; the system is locating an interpreter who will be made available to you. The interpreter, together with the call specialist, will listen to your concern.

Helpline phone numbers by country can be found at [www.oietics.com](http://www.oietics.com).



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