



**GLOBAL CODE OF  
BUSINESS CONDUCT  
AND ETHICS**

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LEADING WITH INTEGRITY



# To All O-I Global Employees

O-I Glass, Inc. is a 100-plus year old company with a proud history. Embedded within our history are the countless actions of O-I employees who each and every day make decisions that reflect the following overarching principles:

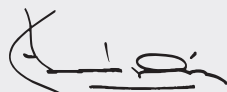
- Compliance with applicable laws and regulations, and
- Adherence to high standards of ethical conduct.

This is the culture of O-I, and it has been the foundation for how we operate throughout our history. On a daily basis, our people make decisions guided by values like honesty, integrity, and business ethics. When our employees around the world do what's right individually, in their teams, and in their business units, we are enabling O-I to lead with integrity.

O-I's Code of Conduct is our guide as to how we conduct business globally. The Code sets the standards for how employees should interact with each other and with O-I's business partners. All of you should be familiar with the Code and the underlying policies, particularly any topics that relate to your role.

When each of us leads with integrity, we build on O-I's outstanding reputation. Through our collective efforts guided by the Code and our values, O-I will continue to grow and prosper. I am confident that our sustainable future will create a lasting legacy for future generations of O-I employees.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andres Lopez', with a stylized flourish at the end.

**ANDRES LOPEZ**

Chief Executive Officer



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## 1

# Our Company

O-I is the largest manufacturer of glass containers in the world. The Company has more than a century of experience crafting sustainable and brand-building glass containers for many of the world's best-known food and beverage brands. Beginning with Michael Owens' invention of the automatic bottlemaking machine in 1903, O-I has grown into a global organization with operations in 23 countries.

O-I is respected for the manner in which it has conducted its business over the years. This reputation has been built upon the Company's high standards of honesty, integrity and business ethics. It is a reputation that is sustained by the actions taken and decisions made by every employee every day. These high standards are important assets of the business, and O-I is determined that they will be maintained.

Companies that maintain high standards of ethical conduct have a competitive advantage. Business relationships built on mutual trust, respect and honesty form a foundation for long term success.

This reputation is our heritage and it will be the legacy that we will leave for future generations of O-I employees.

Just as we are focused on the sustainability of the glass packaging we manufacture, we are also focused on the sustainability of O-I's reputation. Over the years, our employees have been guided by the following principles which have helped us to 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.

In addition to these principles, O-I's focus over the years on operational excellence, safety, quality and employee engagement and development, among other areas, has contributed to O-I's reputation in the marketplace.

As a large, multinational company, O-I is subject to thousands of laws and regulations that govern our business operations globally. As O-I employees, we must each comply with all such applicable laws and regulations in the various countries in which we operate.

In addition to compliance with laws and regulations, each of us must also adhere to the highest standards of ethical conduct in all of our business activities. These standards include honesty, respect and integrity.

Integrity is, and will continue to be, at the heart of all of our business relationships. Integrity is a word and a concept that is known around the world. Being a person of integrity in the workplace applies to all employees at all levels within an organization. O-I's integrity has been critical to achieving its overall leadership position in the marketplace.

As individual employees, each of us leads with integrity when we keep our commitments and treat each other with respect. We lead with integrity when we perform our business roles with excellence, pride and passion. Finally, we lead with integrity when our actions and decisions are guided by our own good judgment and by the highest ethical standards. Please refer to the ten questions that are contained in the Ethical Decision Making section of the Code.

O-I has a well-deserved reputation for high standards of ethical conduct. This reputation is our heritage and it will be the legacy that we will leave for future generations of O-I employees.

## 2

# Introduction

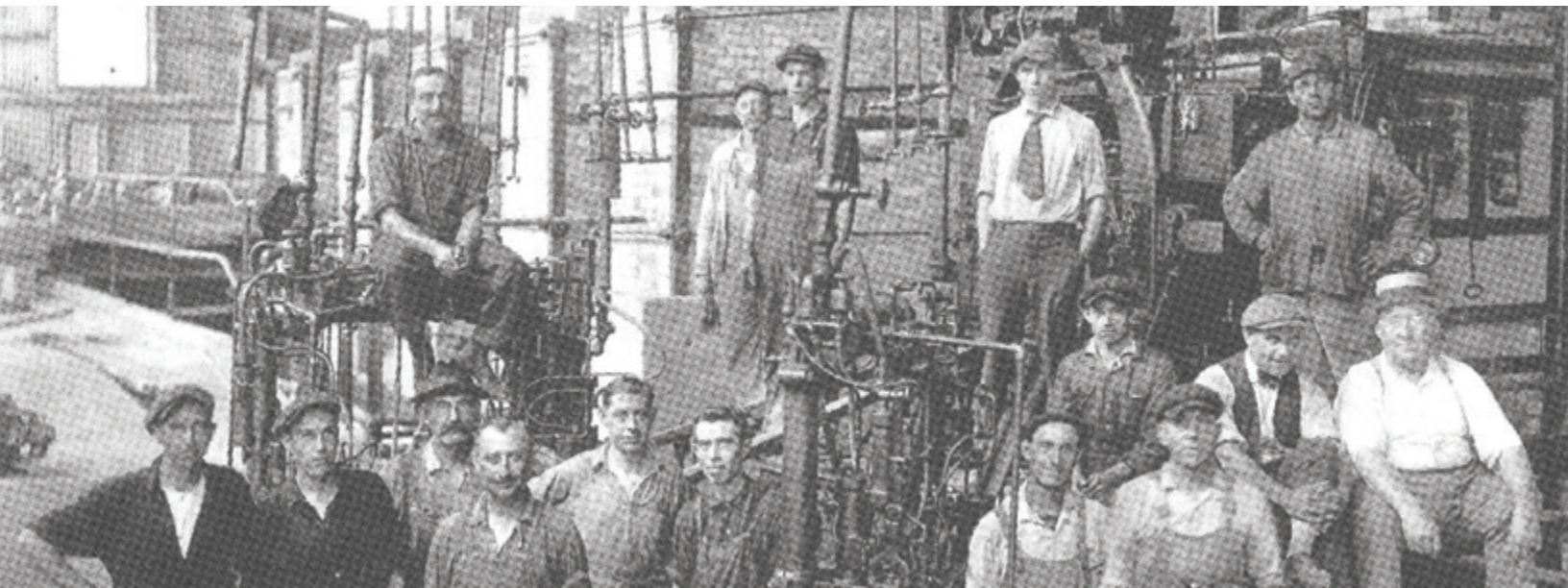
O-I is a company with a proud heritage and strong traditions. O-I is respected for how it has conducted business over the years. Our excellent reputation has been built upon the Company's high standards of honesty, integrity and ethical behavior. These standards are important assets of the Company, and we are determined to maintain them.

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.





*More than 100 years ago, glass pioneer Michael J. Owens invented the automatic bottlemaking machine (1903).*

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.

## 3

## OUR RESPONSIBILITIES as Employees and as Managers

### 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, in particular, understanding and complying with those laws, rules and regulations and O-I policies that apply to the employee's job role.

Employees have a responsibility to act and to make decisions consistent with the Company's high standards of ethical conduct. Employees are required to participate in ethics and compliance training when offered by the Company. Employees are also expected to certify their compliance with the Code at the Company's request.

If an employee has any doubts or questions about a course of action, he or she is expected to seek advice from his or her supervisor, another member of management, Human Resources, the Legal Department or the Ethics and Compliance Office.

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 are expected to fulfill additional responsibilities. Managers in this context would include any O-I employee who supervises others. Managers are expected to be role models for the highest standards of ethical conduct. Managers have a responsibility to create and sustain a workplace culture in which employees know that legal and ethical behavior is expected of them. This includes a work environment where constructive and open discussions, including good faith reports of violations, are encouraged and expected, without fear of retaliation.

Managers have a responsibility to 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. Managers are also responsible for ensuring that employees who need additional information to do their jobs, for example related to environment, safety, antitrust or anti-corruption, are made aware of relevant policies and receive appropriate training.

Managers must be diligent in looking for indications that unethical or illegal conduct is being considered or has occurred. They are expected to take appropriate action to address any situations that seem to be in conflict with the law, this Code or O-I policies. When a manager is unsure of the best response to a given situation, he or she should seek assistance from Human Resources, other managers, the Legal Department or the Ethics and Compliance Office, as appropriate depending on the issue.

Each O-I employee has a responsibility to immediately report actual or suspected violations...

## ETHICAL DECISION MAKING

O-I is committed to giving employees the tools and guidance they need to do their jobs consistent with ethical business conduct. Employees may find it helpful to ask the following ten questions before taking action in specific situations that may present ethical issues:

- Do I have all the information I need to make a good decision?
- Is this action legal?
- Does my decision follow O-I's policies and procedures?
- Is the action consistent with the letter and the spirit of this Code?
- Who else could be affected by this action (other O-I employees, customers, etc.)?
- Will this action reflect negatively on me or O-I?
- How would it look in the media?
- Would I be embarrassed or proud if others knew that I took this course of action?
- Does it feel right/can I sleep at night?
- If I am not sure, have I asked for advice?

If an employee is still unsure or uncomfortable with the course of action after answering each of these questions (and any other questions as appropriate under the circumstances), he or she should talk to a supervisor or any other resources identified in this Code including Human Resources, the Legal Department and the Ethics and Compliance Office. He or she may also contact the Ethics and Compliance Helpline.

## 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, or
- the Ethics and Compliance Office.

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 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.

 1-800-963-6396  
 [www.oietics.com](http://www.oietics.com)

## O-I'S ETHICS AND COMPLIANCE HELPLINE

If an employee is not comfortable with the options listed in the previous section, he or she may contact O-I's Ethics and Compliance Helpline via:

- [www.oietics.com](http://www.oietics.com), or
- 1-800-963-6396 in the U.S. or Canada or the international Helpline numbers listed on [www.oietics.com](http://www.oietics.com).

The Helpline is a resource available to employees who have questions about Company policies or concerns about possible illegal or unethical conduct. Reports to the Helpline may be made anonymously, unless not allowed by local laws. The Helpline does not use caller identification, recording devices, or other methods to identify any person making a report. The Helpline is staffed by an independent third party that provides written reports to the Chief Ethics and Compliance Officer and the Director of Global Internal Audit.

Employee concerns raised will be investigated in a professional manner, and confidentiality will be maintained to the extent possible, consistent with law and conducting a full investigation of the concerns raised. Based on the findings of the investigation, corrective action, if necessary, will be taken.

## 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.

## 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.



## What would you do?

- Q** 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?
- A** 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.
- Q** 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?
- A** 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.

## 4

## OUR RESPONSIBILITIES to Each Other

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.

### 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 Nondiscrimination/Nonharassment Policy.*

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

#### 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. Employees are responsible for following the training that they receive, and for taking other appropriate precautions to protect themselves and their coworkers including immediately reporting accidents, injuries and unsafe practices or conditions.

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 him or her 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.

Workplace violence, including acts or threats of violence or other forms of intimidation, will not be tolerated and must be reported immediately.

#### 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.

#### EMPLOYEE PRIVACY

O-I is committed to respecting the personal information of employees. This means that access to such information 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?

- Q** 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?
- A** Yes. The actions of the customer may be considered sexual harassment and should be reported immediately. O-I's Nondiscrimination/Nonharassment 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. You should ask your coworker to report the situation to her manager or to Human Resources. If she does not, you should report it to your manager.
- Q** 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?
- A** Yes, safety is in every employee's "area." Report your concern to your manager or the safety professional at your location. Think how you would feel if someone were badly hurt because you failed to act.
- Q** My supervisor and several of my colleagues tell jokes that I think are inappropriate and that I find offensive. What should I do?
- A** 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.
- Q** 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.
- A** 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.

## 5

## OUR RESPONSIBILITIES in the Marketplace

O-I's customers, suppliers and other business partners depend on O-I to build strong relationships that satisfy the demands of the marketplace.

### PRODUCT QUALITY AND SAFETY

O-I is committed to meeting the highest quality requirements of our customers with all of the products we supply 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.

### 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 in part upon the Company's ability to maintain lasting customer relationships. The Company is committed to dealing with customers fairly, honestly and with integrity. 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.

### 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.*

### RELATIONSHIPS 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. 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**

Competitive information must be gathered legally and ethically.

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.

## **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?

- Q** I am attending a trade association meeting and several members are discussing pricing strategy. What should I do?
- A** 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. Promptly advise the Legal Department of what you observed.
- Q** My manufacturing facility has a major order to fill. We are running at 100 percent capacity and are under a great deal of pressure to get the shipment out. One of the plant machines seems to be operating incorrectly and may not be safe, but if we shut down the machine, we will miss the shipment deadline. What should I do?
- A** Speak up. You need to immediately report the issue to a supervisor or plant leader and ensure the equipment is safe prior to continuing production. Safety always comes first.
- Q** I suspect one of my peers is recording false readings into a quality-control document, but I have no evidence. Should I report my suspicion?
- A** Yes, you must notify your manager of your concern immediately. It is absolutely critical that quality records are accurate and complete since inaccurate records could compromise our product and subject the Company to unnecessary liability.

## 6

## OUR RESPONSIBILITIES to Our Shareholders

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.

### FINANCIAL REPORTING AND ACCURACY OF BOOKS AND RECORDS

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 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.*



## 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.
- 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.

## INSIDER TRADING

Company policy is to ensure that all investors have equal access to information which might positively or negatively affect the value of the Company's publicly-traded securities. Employees are prohibited from using material nonpublic information for their own financial gain or from disclosing such information to others.

Material inside information may take many forms such as unpublished financial results, operational plans or strategies, nonpublic information regarding significant corporate acquisitions or dispositions and research or technical programs and innovations.

Directors, executive officers and certain other members of management and employees designated by the Company are prohibited from trading in the Company's securities during quarterly blackout periods and during certain event-specific blackouts. These persons must also pre-clear all transactions in the Company's securities.

*See Insider Trading Policy.*



## RECORDS AND INFORMATION MANAGEMENT

The Company's Records Management Policy applies to all of O-I's paper and electronic records. It is every employee's responsibility to ensure that O-I's records are created, retained, protected, and disposed of properly. Each employee must comply with all laws relating to records preservation and must not alter, conceal, or destroy documents or records that are subject to litigation or governmental investigation.

*See Records Management 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 of the Code" section of this Code. In addition, employees should report suspected conflicts of interest involving other employees.

*See Conflict of Interest Policy.*



Employees have an obligation to advance the Company's interests when the opportunity to do so arises.

#### **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.

#### **CONFIDENTIAL INFORMATION**

Employees have access to many types of confidential information while employed at the Company. Confidential information includes all non-public information that might be of use to competitors, or, if disclosed, harmful to the Company or its customers. Employees have a duty to safeguard all confidential information of the Company or third parties with which the Company conducts business, except when disclosure is authorized or legally mandated. An employee's obligation to protect confidential information continues after he or she leaves the Company. Unauthorized disclosure of confidential information could cause competitive harm to the Company or its customers and could result in legal liability to the employee and the Company.

Any questions or concerns regarding whether disclosure of Company information is required by law should be promptly referred to the Legal Department.

## 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.*

The Company expects that employees will use the computer systems, email systems, Internet and electronic storage in an appropriate and proper manner.

## E-MAIL COMMUNICATIONS AND USE OF COMPUTER SYSTEMS

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, Human Resources, the Legal Department, another member of management, or the Ethics and Compliance Office.

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.*



## What would you do?

- Q** 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?
- A** 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.
- Q** 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?
- A** 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.
- Q** 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?
- A** 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.
- Q** 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?
- A** 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.

## 7

## OUR RESPONSIBILITIES as Corporate Citizens

O-I is committed to conducting our business in a sustainable and ethical manner. Promoting compliance with the laws and regulations that apply to our business is at the foundation of corporate citizenship.

### COMPLIANCE WITH LAWS

The first obligation of responsible corporate citizenship is to comply with the laws of the countries and communities in which O-I does business. 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 or the Legal Department.

### ENVIRONMENT

O-I recognizes its environmental responsibilities and is committed to maintaining facilities around the world that are environmentally compatible with their communities. Although this commitment is founded on compliance with law, it goes beyond that foundation. O-I strives to continuously improve its environmental performance.

The Company has policies and operating procedures 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. Employees are also 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 to the Global EHS function, the Legal Department, or the appropriate business manager immediately.

## SUSTAINABILITY

The glass container is the most sustainable packaging on Earth. It's made from natural sand, soda ash, limestone and recycled glass. It's infinitely recycled. O-I, as the world's largest manufacturer of glass containers, is working to be the most sustainable one as well. In order to drive further sustainability in its operations, O-I has established various sustainability goals which are publicly available on its website.

## 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 O-I Charities Foundation and the voluntary charitable leadership offered by thousands of O-I employees around the world, demonstrate this commitment.

## 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 Guidelines

### ACCEPTABLE

- Promotional items such as merchandise with the 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.
- 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.

### 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.
- 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.

## 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.

## 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.

## 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 before engaging in any activity that may be in violation of such laws.

See *Global Trade Controls Policy*.

## 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.

## 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.

O-I cooperates with every reasonable request from government agencies and authorities.





## What would you do?

- Q** I was invited to a golf outing sponsored by one of our suppliers. Several industry leaders will be there. Can I attend?
- A** Because this outing is business-related, you can attend, with your manager's approval. However, if a contract is currently under negotiation with the supplier, you should discuss with your manager whether or not it is appropriate for you to attend.
- Q** Over the course of a year I typically receive multiple tickets to sporting events from one of my large vendors. Is it acceptable for me to receive these tickets?
- A** Our policy allows O-I employees to receive modest gifts over the course of a year. However, the total value of any gift(s) received from a single person or entity must not exceed the annual limit of \$200USD in the case of business partners (\$50USD in the case of government officials) as specified in the Anti-Corruption Policy. Gifts exceeding this limit must be submitted for pre-approval before acceptance.
- Q** 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 1 percent of all sales "under the table."
- A** 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.
- Q** 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?
- A** 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.

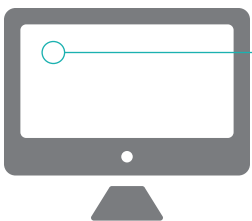
## 8

# Resources / How to Get Help

## 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.



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
- Corporate 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:

- Call: +1-567-336-2410
- 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.oiethics.com](http://www.oiethics.com), or call toll-free using the country numbers that can be found on the website.

In addition, a network of regional/country compliance officers or champions will be designated, communicated to employees and posted on O-I Home.

## LOCAL HELPLINE NUMBERS

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

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



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