

## **Non-Discrimination / Non-Harassment Policy**

### **PURPOSE**

It is the policy of O-I Glass, Inc., including the applicable employing subsidiary, division, affiliate and/or assign (collectively “O-I”), to maintain a work environment that is free from discrimination and unlawful harassment on the basis of race, color, sex (including pregnancy, childbirth or related medical conditions), gender, gender identity or expression (including transgender identity or expression), gender stereotyping, 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 for all employees, applicants, contractors, interns and volunteers.

### **SCOPE**

This policy applies to all employees of O-I. Employees in New York are also subject to the New York Sexual Harassment Prevention Policy, which supplements this policy. Employees in Oregon are also subject to the Oregon Addendum to O-I’s Non-Discrimination / Non-Harassment Policy, which supplements this policy.

### **GENERAL GUIDELINES**

O-I will employ and advance individuals in accordance with their abilities and will make reasonable accommodations that do not impose an undue hardship on the Company for (1) qualified individuals with disabilities of which O-I is aware; and, (2) employees’ religious observances, practices and beliefs. An employee needing an accommodation for medical or religious reasons should contact their People & Culture (Human Resources) business partner or the Corporate People & Culture (Human Resources) Department.

O-I prohibits conduct in the workplace based on an individual’s protected class status. The “workplace” includes any time an employee is on company premises, at a company-sponsored off-site event, traveling on behalf of the company, conducting company business regardless of location, and in any other situation impacting the workplace.

This policy prohibits taking employment action, including recruiting, hiring, training, promotion, compensation, transfer, discipline, recall, termination or any other term, condition or privilege of employment, based on a protected characteristic. It also prohibits any conduct in the workplace that a reasonable person would consider unwelcome, intimidating, hostile, threatening, violent, abusive or offensive.

Unlawful harassment is verbal, non-verbal, visual, physical or sexual conduct that is unwelcome and is based on an individual’s protected class status. It occurs when:

- submission to the unwelcome conduct is made either an explicit or implicit condition of an individual's employment;

- submission to or rejection of the unwelcome conduct is used as a basis for employment decisions affecting the individual, such as reduced hours or responsibilities, a failure to promote, re-assignment to a position with significantly different responsibilities, or termination; or
- the unwelcome conduct unreasonably interferes with an individual's work performance and is sufficiently severe or pervasive to constitute a hostile, intimidating, or offensive work environment.

Sexual harassment may include unwelcome sexual advances, requests for sexual favors, derogatory jokes, display of pornographic or sexually suggestive materials, and other conduct of a sexual nature. Sexual assault is unwanted conduct of a sexual nature that is inflicted upon a person or compelled through the use of physical force, manipulation, threat or intimidation.

Workplace discrimination or harassment is a serious offense that will subject violators of this policy to discipline, up to and including termination of employment.

#### **COMPLAINT PROCEDURE:**

If you feel you have been discriminated against or harassed in violation of this policy, you should immediately report your concern to your manager, your People & Culture (Human Resources) business partner, another member of management, or to the Ethics and Compliance Helpline via [www.oietethics.com](http://www.oietethics.com) or the telephone numbers listed on the Helpline website. Hourly workers subject to collective bargaining agreements should also immediately report the matter to a union official for handling through the contract grievance procedure. This policy does not require reporting harassment directly to any one creating the harassment. In such circumstances, one of the other reporting mechanisms should be used.

If you witness discrimination or harassment, including sexual harassment, you should immediately report it using one of the reporting methods described above.

Any manager who is aware of conduct inconsistent with this policy is required to report it to his/her People & Culture (Human Resources) business partner or to the Ethics and Compliance Helpline.

O-I prohibits retaliation against any person who in good faith reports an incident of discrimination or harassment, provides information related to such an incident, or otherwise cooperates in an investigation of a reported violation of this policy.

O-I will keep all complaints confidential to the fullest extent possible, while still allowing for a thorough investigation.

If O-I determines that a violation of this policy occurred, even if not rising to the level of unlawful discrimination or harassment, it will take prompt corrective action calculated to eliminate the discrimination or harassment.

## **OREGON ADDENDUM TO O-I's NON-DISCRIMINATION / NON-HARASSMENT POLICY**

O-I encourages anyone who believes that they have been subjected to discrimination, harassment (including sexual harassment or assault), or retaliation in the workplace in violation of O-I's Non-Discrimination/Non-Harassment Policy to report it internally using one of the reporting mechanisms set forth in O-I's Non-Discrimination / Non-Harassment Policy. Similarly, employees subject to a collective bargaining agreement are encouraged to file a formal grievance. Only through such reporting can O-I do all it can to prevent and correct unlawful discrimination, harassment and retaliation.

### **Time Limitations:**

Nothing in this policy precludes any person from pursuing claims outside O-I's internal process, including with the Bureau of Labor and Industries' Civil Rights Division or the Equal Employment Opportunity Commission. Note that Oregon state law requires that any legal action taken on alleged discriminatory conduct (specifically that prohibited by ORS 659A.030, 659A.082 or 659A.112) commence **no later than five (5) years** after the conduct occurred. Other applicable laws may have a shorter time limitation on filing.

### **Non-disclosure, Non-disparagement and No-Rehire:**

A non-disclosure agreement is any agreement by which one or more of the parties agrees not to discuss or disclose information regarding any complaint of work-related discrimination or harassment (including sexual assault).

A non-disparagement agreement is any agreement by which one or more of the parties agrees not to discredit or make negative or disparaging written or oral statements about any other party or the company.

A no-rehire provision is an agreement that prohibits an employee from seeking re-employment with the company and allows a company to not rehire that individual in the future.

O-I will not require an employee to enter into any agreement if the purpose or effect of the agreement prevents the employee from disclosing or discussing conduct constituting discrimination or harassment (including sexual assault).

An employee claiming to be aggrieved by discrimination or harassment (including sexual assault) may, however, voluntarily request to enter into a settlement, separation, or severance agreement that contains a non-disclosure, non-disparagement, and/or no-rehire provision and, if such an agreement is executed, will have at least seven (7) days to revoke any such agreement.

### **Documentation:**

Employers and employees are advised to document any incidents of suspected unlawful discrimination, harassment (including conduct that constitutes sexual assault), and retaliation.

**Acknowledgment**  
**Non-Discrimination/Non-Harassment Policy with Oregon Addendum**

Please read the attached policy, sign this acknowledgement, and return it to your People & Culture (Human Resources) business partner.

**ACKNOWLEDGEMENT**

I \_\_\_\_\_, acknowledge that I have received the Non-Discrimination/Non-Harassment Policy with the Oregon Addendum. I have reviewed and understand the policy.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date