

Context

O-I Australia encourages all its employees to speak up if they see behaviour that does not adhere to or align with O-I Australia's corporate values.

O-I Australia is committed to a Whistleblowing Program that provides an environment that allows for the safe reporting of any conduct that is contrary to O-I Australia's Values and Policies including the O-I Global Code of Business Ethics and Conduct.

Purpose

This Whistleblower Policy forms part of O-I Australia's risk management measures. The purpose of this Policy is to:

- document and provide transparency around the way that Whistleblower Reports are handled within O-I Australia;
- encourage people to disclose wrongdoing and to ensure those who do so feel safe and confident that they will be protected and supported;
- define roles and responsibilities in the management of Whistleblower Reports; and
- align with our legal and regulatory requirements.

This Whistleblower Policy is an important tool for helping O-I Australia to identify wrongdoing that may not be uncovered unless there is a safe and secure means for disclosing wrongdoing.

Scope

This Policy applies to the activities of all lines of business and operation at O-I Australia. For the purposes of this Policy, Owens-Illinois Holding (Australia) Pty Ltd and its Australian wholly owned subsidiaries are collectively referred to as O-I Australia.

Communication of this policy

A copy of this Policy, will be made available:

- on oiethics.com website (which is accessible by employees of O-I Australia or external parties);
- to all Directors, Officers and the O-I Australia Leadership team;
- to all employees and contractors as part of their safety induction; and
- to all employees and contractors who request a copy of it.

Disclosures that qualify for protection

If you make a Whistleblower Report you will qualify for protection if you are an **eligible whistleblower** and your report is a **disclosable matter** that is made:

- directly to an **eligible recipient** (refer to Lodging a Whistleblower Report for further information on this term) or to the Australian Securities and Investments Commission (**ASIC**), Australian Prudential Regulation Authority (**APRA**) or another Commonwealth body prescribed in the Corporations Act 2001 (Cth) (**Corporations Act**);
- to a legal practitioner for the purposes of obtaining legal advice or legal representation about the operation of the whistleblower provisions in the Corporations Act; or
- as an 'emergency disclosure' or 'public interest disclosure'.

Eligible whistleblower

You are an **eligible whistleblower** if you are a past or present:

- O-I Australia employee (including an employee who is full time, part time, fixed term or temporary);
- O-I Australia officeholder (including a Director);
- O-I Australia contractor, consultant, service provider, supplier or business partner, associate, or an employee of such a party whether paid or unpaid (including an intern or secondee); or
- a spouse, relative or dependant of one of the people referred to above.

Disclosable matters - what should be reported

If you in good faith have reasonable grounds to suspect any behaviour or conduct that involves misconduct or an improper state of affairs or circumstances (which includes conduct that may not involve a contravention of a particular law) you should report this in accordance with this Policy. This includes conduct that is:

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| • Fraudulent | • Corrupt | • Dishonest |
| • Illegal | • Unethical | • Discriminatory |
| • Creating an unsafe environment | • Harassment and/or bullying of any kind | • In breach of any of O-I Australia 's policies |
| • Detrimental to O-I Australia and could cause financial or non-financial loss | • Bribery | • Represents a danger to the public or financial system, including harm to consumers |
| • Negligent | | |

Certain disclosures may not qualify for protection

It's important to know that not all matters will qualify for protection under this Policy, however, they could be protected under other legislation, such as the Fair Work Act 2009.

Generally speaking, a disclosure that relates to a **personal work-related grievance** does not constitute a Whistleblower Report, and therefore does not qualify for protection under the Corporations Act. Personal work-related grievances are generally grievances relating to current or former employment or engagement of an individual (or that of a relative or dependant) that have personal implications for them solely but do not have any other significant implications for O-I Australia or relate to any conduct about a **disclosable matter**.

These include interpersonal conflicts between employees, or a decision relating to employment or engagement, such as a transfer, promotion or disciplinary action. Any personal work-related grievances should be raised with your line manager or Human Resources representative.

However, this policy will still apply in some circumstances to personal work-related grievances, such as where your concern:

- also includes information about misconduct (mixed report);
- relates to any detriment caused to you as a result of raising a concern regarding a disclosable matter;
- relates to breaches of a law of the Commonwealth, including that punishable by 12 months imprisonment or more, or represents a danger to the public or the financial system; or
- has significant implications for O-I Australia.

A personal work-related grievance may also still qualify for protection if you have sought legal advice or representation about the operation of the whistleblower protections under the Corporations Act.

You can still qualify for protection even if your disclosure turns out to be incorrect and we encourage you to make a Whistleblower Report where you in good faith have reasonable grounds to believe that a disclosable matter exists.

Lodging a Whistleblower Report

If you would like to make a Whistleblower Report that qualifies for protection, you must make a report directly to an **eligible recipient**. You can do this by using any of the following channels:

- reporting via the O-I Ethics and Compliance Helpline via www.oietics.com or via 1800 339 276;
- speaking to or emailing the Whistleblower Protection Officer at wblower@o-i.com;
- making a report to an officer (a Director or Secretary), Leadership Team member of O-I Australia or other senior manager at O-I Australia; or
- speaking to or emailing the auditor (including a member of the audit team) of O-I Australia or actuary of O-I Australia (if applicable).

You can choose to remain anonymous while making a Whistleblower Report, interacting during the investigation of your Whistleblower Report, as well as after your case is closed. At any given time you can identify yourself, but this is your choice and at no point do you need to do this or will you be forced to provide your identity. You can refuse to answer questions that you feel could reveal your identity at any time, including during follow-up conversations. If you wish to remain anonymous, you

should maintain ongoing two-way communication with O-I Australia, so O-I Australia can ask follow-up questions or provide feedback.

If you decide to disclose your identity, O-I Australia may only disclose your identity in the circumstances described under “Anonymity” below. O-I Australia will also take the following steps to protect your identity:

- referring to you with gender neutral language;
- redacting any of your personal details in a Whistleblower Report;
- ensuring that disclosures are handled and investigated by the Whistleblower Investigating Officer;
- all paper and electronic documents and other materials relating to disclosures will be stored securely;
- access to all information relating to a disclosure will be limited to those directly involved in managing and investigating the disclosure;
- only a restricted number of people who are directly involved in handling and investigating a disclosure will be made aware of your identity (subject to you having agreed to that) or information that is likely to lead to the identification of you as the discloser; and
- each person who is involved in handling and investigating a disclosure will be reminded about the confidentiality requirements, including that an unauthorised disclosure of a discloser’s identity may be a criminal offence.

O-I Australia will also take all steps necessary (as outlined in this Policy) to ensure you do not suffer any detriment.

O-I Australia will make every endeavour to investigate your report where possible and appropriate, but in some cases, there are limitations of what can be achieved if you decide to remain anonymous.

The Investigation Process

Whistleblower Protection Officer

O-I Australia has appointed the General Counsel, APAC to be the Whistleblower Protection Officer (**WPO**). The Whistleblower Protection Officer will report directly to the Board of Owens-Illinois Holding (Australia) Pty Ltd for the purposes of this Policy. The Whistleblower Protection Officer’s role is to safeguard the interests of Eligible Whistleblowers and ensure that the mechanisms in place under this Policy are met.

Once a Whistleblower Report has been received, the report will be assessed by the WPO who will determine the next steps that need to be taken (for example, whether the report is actually relating solely to **personal-work-related grievance** rather than a **disclosable matter** and the scope of any investigation that may be able to be conducted based on the information in the report). Where the report is to be investigated, it will be referred to the Whistleblower Investigation Officer (WIO).

Whistleblower Investigation Officer

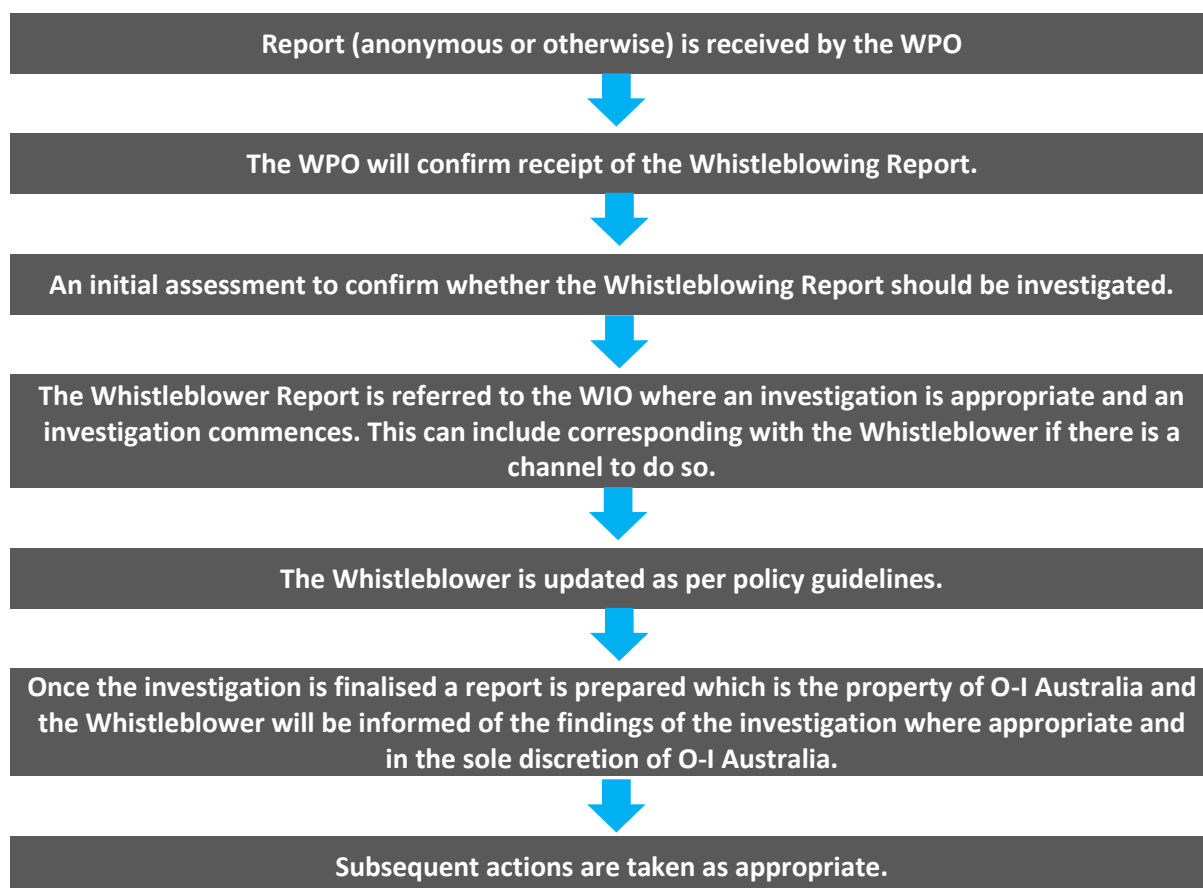
O-I Australia has appointed the General Counsel, APAC to be the Whistleblower Investigation Officer. The Whistleblower Investigation Officer’s role is to manage the investigation of Whistleblower Reports.

If a Whistleblower Report involves the Whistleblower Protection Officer/Whistleblower Investigation Officer or anyone within the same business unit as the Whistleblower Protection Officer/Whistleblower Investigation Officer, the Board of Owens-Illinois Holding (Australia) Pty Ltd

will appoint an appropriate person internally (e.g. a senior manager) or externally to conduct the required investigation.

The investigation

This investigation flow applies regardless of which channel a Whistleblower Report has originated from. The diagram below outlines the high level steps O-I Australia will apply once a report has been received.



Using third parties

O-I Australia may utilise third parties to carry out certain activities under this Policy. These third parties include:

- **Whistleblowing Platform:** a third party whistleblowing platform to leverage technologies that supports O-I Australia keeping the identity of its Whistleblowers anonymous (if required). This platform also allows for two-way, anonymous communication as well as case management and data protection features.
- **Accounting Firms:** a third party accounting firm to undertake forensic investigating of specific reports.
- **Investigative Firms:** specialist investigative firms to investigate specific cases where O-I Australia does not have the skills in-house.

Updating the Whistleblower

As part of any investigative process, if the Whistleblower can be contacted then the Whistleblower will be updated as to the progress of the investigation. These updates may include the following:

- confirming receipt of a Whistleblowing Report;
- advising that the investigative process has begun;
- providing updates on the investigation status (even if there has been no progress);
- advising when the investigation has been closed.

O-I Australia will share feedback on the investigation where possible and appropriate. However, due to privacy and/or confidentiality requirements, there may be information that cannot be shared with the Whistleblower, including providing details of the outcome of the investigative process. The frequency and timeframe of updates may vary depending on the nature of the disclosure.

Escalation

If the Whistleblower is not satisfied with a decision not to conduct an investigation into their concern or the findings of any investigation, they can escalate this to the People and Services Director, APAC. The Whistleblower should provide this escalation in writing so that a formal review can take place.

While the People and Services Director, APAC commits to review the request, O-I Australia is under no obligation to commence or reopen any investigation. If the People and Services Director, APAC concludes that an investigation was not appropriate or that the findings of any investigation were appropriate, the matter will be concluded.

How Whistleblowers Are Protected

Anonymity

After submitting a Whistleblower Report, the following is in place to protect a Whistleblower's identity:

- the Whistleblower has the right to remain anonymous and does not need to identify themselves at any time during the investigation process;
- O-I Australia uses different confidential methods that help protect a Whistleblower's identity during and after submitting a report;
- at no time will O-I Australia force the Whistleblower to reveal their identity; and
- the Whistleblower can refuse to answer questions they feel could identify themselves.

O-I Australia may only disclose the identity of a Whistleblower:

- to ASIC, APRA or a member of the Australian Federal Police (AFP);
- to a legal practitioner (for the purposes of obtaining legal advice in relation to the whistleblower provisions in the Corporations Act); or

- with the consent of the Whistleblower.

Protection from Detriment

O-I Australia does not tolerate any retaliation or attempts to retaliate against a Whistleblower who has made, proposes to make or could make a Whistleblower Report. Any director, officer, employee or associated person that is found to engage in conduct that causes detriment to a Whistleblower will face disciplinary action, including the potential to be dismissed or disengaged. They can also face consequences under the Corporations Act which makes it illegal (through a criminal offence and a civil penalty) for someone (the offender) to cause or threaten detriment to a person because they believe or suspect that person made, may have made, or could make a whistleblower disclosure.

O-I Australia will protect the Whistleblower from detrimental conduct as a result of making a Whistleblower Report, including:

- being terminated or having their employment ceased;
- injury of an employee in their employment or alteration of their duties to their disadvantage;
- harassment or intimidation;
- harm or injury;
- damage to property, reputation, business, financial position or any other damage;
- discrimination; and
- any other action that can be perceived as retaliation for making a report.

If a Whistleblower believes retaliation is near or imminent, or that they have been retaliated against,, then the Whistleblower should contact the Whistleblower Protection Officer.

The Whistleblower Protection Officer will take any action they feel is appropriate to resolve the situation. Potential steps to protect a Whistleblower from a considered risk of retaliation can include:

- the Whistleblower taking leave;
- the Whistleblower being reassigned to other duties (that is not to their disadvantage);
- the Whistleblower being able to undertake alternative work practices including working from home.

If the Whistleblower feels their report of retaliation was not resolved adequately, they can escalate this case in writing to the People and Services Director, APAC and they will investigate the matter and process for how the reported retaliation was dealt with.

Compensation and other remedies

Whistleblowers (or any other employee or person) can seek compensation and other remedies through the courts if they suffer loss, damage or injury because of a disclosure, and it is proven that O-I Australia failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Protection from civil, criminal and administrative liability

Whistleblowers are protected from any civil, criminal and administrative liability, in relation to their disclosure. However, this protection does not grant immunity for any misconduct a Whistleblower has engaged in that is revealed in their disclosure.

Protection and immunity for others

Other parties that might have to bear witness or are involved in the investigation will be protected from retaliation in the same manner as the Whistleblower.

Any parties allegedly involved in the conduct reported in the Whistleblower Report will be afforded an opportunity to respond to the allegations.

Separation of Issues

O-I Australia will be able to still raise with a Whistleblower any issues related to work or performance related issues that arise in the ordinary course of a person's employment or contractual relationship with O-I Australia (for example, any separate performance or misconduct concerns). O-I Australia can still raise any performance or conduct issues with a Whistleblower as long as they are not influenced by any Whistleblower Reports that have been made.

Training

General Counsel, APAC will facilitate training for all employees on this Whistleblower Policy to ensure that employees are generally aware of this Policy and their rights and responsibilities under it.

Reporting to the Board

The Board of Owens-Illinois Holding (Australia) Pty Ltd is regularly updated on O-I's Whistleblowing Program, inclusive of summary information relating to reports, investigations, and results, which are de-identified as required. Reports or investigations carrying an undue amount of risk may be reported to the Board outside of the usual updates. The Board at any time can ask about the state of O'I Australia's Whistleblowing Program.

Roles and Responsibilities

ROLE	RESPONSIBILITY
Board of directors of Owens-Illinois Holding (Australia) Pty Ltd	<ul style="list-style-type: none">• Approves this policy• Receives updates on the Whistleblowing Program• Champions the Whistleblowing Program and overseeing the implementation and effectiveness of the program.
Chief Executive Officer (or equivalent)	<ul style="list-style-type: none">• Endorses the Whistleblowing Program
Whistleblower Protection Officer	<ul style="list-style-type: none">• Manages the Whistleblowing Program.

ROLE	RESPONSIBILITY
	<ul style="list-style-type: none"> Determines whether a Whistleblower Report should be investigated and subsequently refers those reports to the WIO Provides support to Whistleblowers Prepares updates in relation to activities undertaken under this Policy for the Board as required
Whistleblower Investigation Officer	<ul style="list-style-type: none"> Manages Whistleblower investigations

Policy Governance

This **Whistleblower Policy** will be reviewed at least every two years to ensure that it is operating effectively and appropriately reflects how whistleblowing matters are managed at O-I Australia. The review will also ensure that the Policy evolves in line with changes in the nature, scale and complexity of O-I Australia's business, its operating and regulatory environments.

Attachments can be amended by management or the appropriate governance body, without the need to update and re-approve the policy document.

Related Policies

- O-I Global Code of Business Ethics and Conduct
- Anti-Corruption Policy
- Non Discrimination/Non Harassment Policy

Revision History	
Policy Status	<input checked="" type="checkbox"/> NEW <input type="checkbox"/> REVISION of existing policy
Description of Revision	Original policy
Policy Owner	General Counsel
Approval By	People and Services Director
Approval Date	11 December 2019
Last Revision Date	11 December 2019

Appendix: Protections for whistleblowers provided by Australian law

How will I be protected if I raise a concern?

Two key protections inform all aspects of O-I Australia's whistleblower program.

Confidentiality: We protect the confidentiality of whistleblowers who raise concerns. We do this by limiting how both your identity and information that is likely to lead to your identification is shared. Your identity will be kept confidential to the fullest extent possible and only shared as permitted by you or by law.

Non-victimisation: We protect whistleblowers from detriment caused because they raised a concern or plan to raise a concern. We do not tolerate anyone threatening to cause or causing detriment to you because of your desire or decision to raise a concern. Doing so is taken seriously by O-I Australia and may lead to disciplinary action.

O-I Australia also provides a Whistleblower Protection Officer to help support you and assist you with your report. Should you require any assistance, we encourage you to speak to the Whistleblower Protection Officer. Further details of how we protect whistleblowers is set out in the body of this policy.

In certain circumstances, these protections will also be enforceable under the *Corporations Act* or the *Tax Administration Act* (where a report relates to a breach of Australian tax law or tax-related misconduct). Where those provisions apply, you are also protected from liability for making the report (either by way of civil, criminal or administrative legal proceedings, or contractual or other remedies being sought against you). Information you disclose cannot be used in legal proceedings against you (except for proceedings in relation to giving false information).

When will I be protected?

O-I Australia provides protections to whistleblowers who raise concerns pursuant to this policy. O-I Australia encourages whistleblowers to make disclosures to O-I Australia to assist O-I Australia to identify and address potential wrongdoing as early as possible. As set out below, there are also other ways in which disclosures can be made.

O-I Australia also provides these protections to any whistleblower who makes a disclosure regarding a disclosable matter that is protected under law to:

- a director, officer or senior manager of O-I Australia;
- an auditor, or a member of the audit team conducting an audit of O-I Australia;
- an actuary of O-I Australia;
- ASIC or APRA; or
- a legal practitioner, for the purpose of obtaining legal advice or legal representation in relation to your concern.

In limited circumstances, certain "public interest" or "emergency" disclosures made to a journalist or

parliamentarian are also protected by law. It is important for you to understand the criteria for making a "public interest" or "emergency" disclosure. A disclosure must have previously been made to ASIC, APRA or a prescribed body and written notice provided to the body to which the disclosure was made. In the case of a public interest disclosure, at least 90 days must have passed since the previous disclosure. You should contact an independent legal adviser before making a "public interest" disclosure or an "emergency" disclosure.

What should I do if a protection is breached?

O-I Australia takes any breach of these protections seriously. Where you believe a breach has occurred, you should raise a concern with the Whistleblowing Protection Officer.

If you suffer detriment because you have or propose to raise a concern, you may be entitled to compensation or other remedies in some circumstances.

Is anything not covered by O-I Australia's whistleblower program?

O-I Australia's whistleblowing program and the protections under the *Corporations Act* or *Tax Administration Act* generally do not apply to personal work-related grievances. These are usually reports which relate to your employment.

Instead, these matters should be reported to your line manager or your Human Resources Representative.

However, this policy will still apply in some circumstances, such as where your concern:

- also includes information about misconduct (mixed report);
- relates to any detriment caused to you as a result of raising a concern regarding a disclosable matter;
- relates to breaches of a law of the Commonwealth, including that punishable by 12 months imprisonment or more, or represents a danger to the public or the financial system; or
- has significant implications for O-I Australia.

A personal work-related grievance may also still qualify for protection if you have sought legal advice or representative about the operation of the whistleblower protections under the *Corporations Act*.

Where in doubt, you should make your report to an eligible recipient under this policy. They will make sure your report is dealt with under the right policy.

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