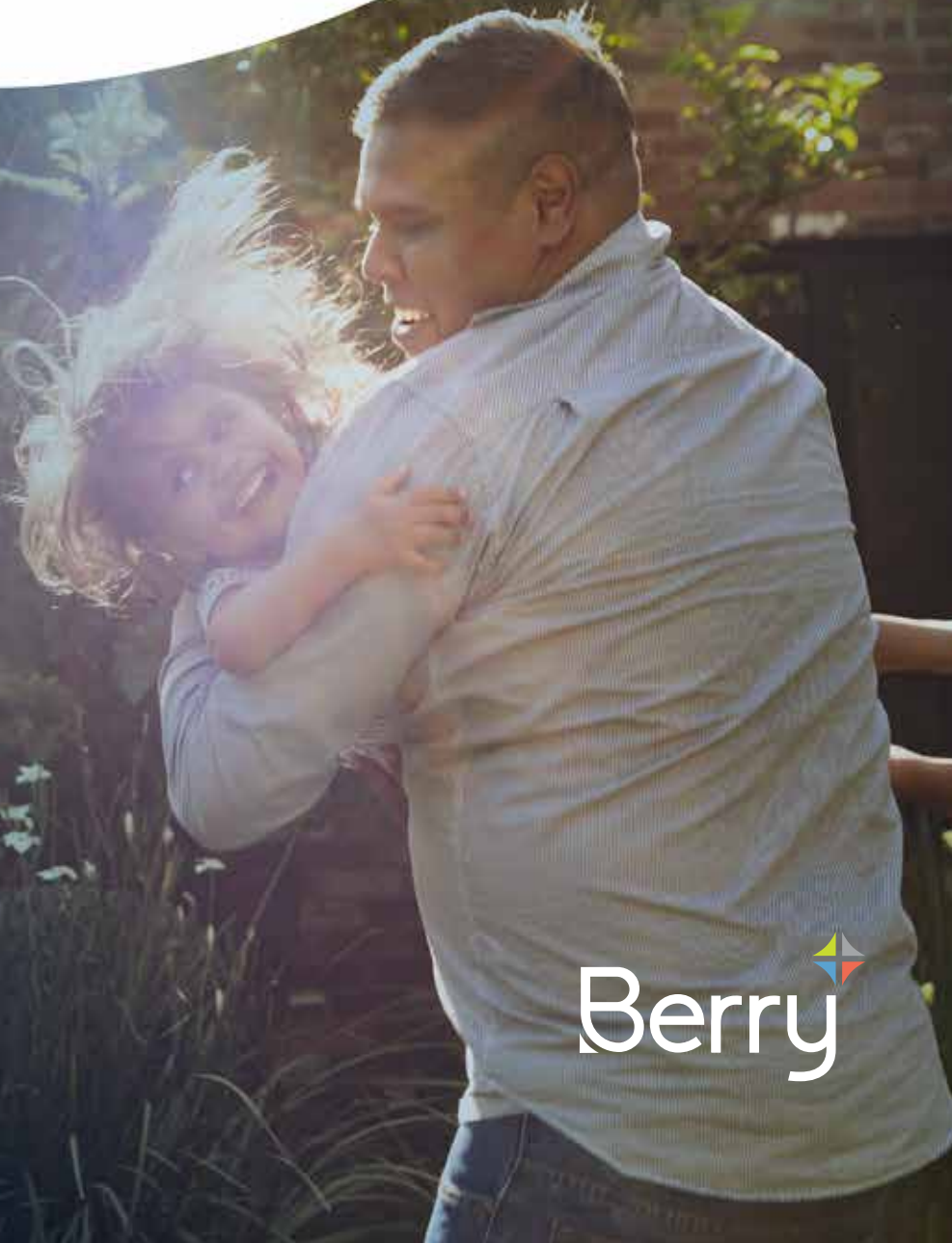


# GRI Index 2019



Always advancing to  
protect what's important.



# Berry 2019 GRI Index

This Global Reporting Initiative (GRI) Index is a supplement to our 2019 Impact report. The intent of this document is to reference where to find information that has been publicly disclosed in other documents, as well as provide additional information that has not been disclosed elsewhere, in accordance with the GRI Standards: Core option. Data is provided for all of our global operations for our 2019 Fiscal Year (October 1, 2018–September 28, 2019), excluding joint ventures for which we do not have operational control. Unless indicated otherwise, this data has not been externally assured.

## General Disclosures

Disclosure	Description	Response or Reference																														
<b>1. Organization Profile</b>																																
102-1	Name of the Organization	Berry Global Group, Inc. (BERY)																														
102-2	Activities, Brands, Products, and Services	<a href="#">Form 10-K</a> p. 3-5 “Segment Overview” Brands: <a href="http://www.berryglobal.com/our-brands">http://www.berryglobal.com/our-brands</a>																														
102-3	Location of Headquarters	Evansville, Indiana, USA																														
102-4	Location of Operations	<a href="#">Form 10-K</a> p. 10 “Properties”																														
102-5	Ownership and Legal Form	Berry is a publicly traded company (NYSE: BERY)																														
102-6	Markets Served	<a href="#">Form 10-K</a> p. 3 “General” <a href="http://www.berryglobal.com/markets">http://www.berryglobal.com/markets</a>																														
102-7	Scale of the Organization	<a href="#">Form 10-K</a> Total Number of Employees: Approximately 48,000 Total Number of Facilities: 290 Net Sales: \$13 Billion Quantity of Products: 100,000+ SKUs																														
102-8	Information on Employees and Other Workers	<table border="1"> <thead> <tr> <th></th> <th>North America</th> <th>South America</th> <th>EMEIA</th> <th>Asia</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td><b>Female Employees</b></td> <td>6,185</td> <td>128</td> <td>5,690</td> <td>1,965</td> <td>13,968</td> </tr> <tr> <td><b>Male Employees</b></td> <td>14,853</td> <td>892</td> <td>14,901</td> <td>3,308</td> <td>33,954</td> </tr> <tr> <td><b>Total Employees</b></td> <td>21,038</td> <td>1,020</td> <td>20,591</td> <td>5,273</td> <td>47,922</td> </tr> <tr> <td><b>Temporary Employees (FTE)</b></td> <td>1,061</td> <td>40</td> <td>2,384</td> <td>499</td> <td>3,984</td> </tr> </tbody> </table> <p>As of September 28th, 2019 EMEIA = Europe, Middle East, India, and Africa FTE = Full Time Equivalent</p>		North America	South America	EMEIA	Asia	Total	<b>Female Employees</b>	6,185	128	5,690	1,965	13,968	<b>Male Employees</b>	14,853	892	14,901	3,308	33,954	<b>Total Employees</b>	21,038	1,020	20,591	5,273	47,922	<b>Temporary Employees (FTE)</b>	1,061	40	2,384	499	3,984
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# General Disclosures

Disclosure	Description	Response or Reference
<b>1. Organization Profile (continued)</b>		
102-9	Supply Chain	<p>Our most significant raw material is plastic resin. We work very closely with our resin suppliers. We use additional materials, including butyl rubber, adhesives, paper and packaging materials, linerboard, rayon, polyester fiber, and foil. We source raw materials, equipment, and services for our global operations from suppliers around the world.</p> <p>In FY19, we acquired RPC Group. The procurement groups of the two legacy companies have been working closely together since the acquisition to drive synergies. We are actively working together to ensure compliance with regulatory and customer requirements for supply chain management across six continents. At this time, we have not integrated how we manage suppliers from an ESG/sustainability perspective, but we recognize the impact we can achieve by leveraging our scale for good across our tens of thousands of suppliers.</p> <p>Berry and RPC had similar strategies for supplier engagement - each focusing on 1) resin suppliers, 2) new suppliers, and 3) the top 100-150 suppliers, representing approximately 80% of spend.</p> <p>Berry manages top suppliers by category through our BEST (Berry Exceptional Supplier Team) program, which formally documents supplier performance semi-annually. Executive management and commodity managers use this program to closely evaluate and improve supplier performance across each category.</p>
102-10	Significant Changes to the Organization and Its Supply Chain	<a href="#">Form 10-K</a> p. 13-14 "Recent Acquisitions"
102-11	Precautionary Principle or Approach	<p>The Audit Committee of the Board of Directors has oversight responsibility for risk assessment and risk management practices of the Company.</p> <p>Furthermore, both our Sustainability and Environmental policies were developed with the intent of proactively minimizing the impacts of our processes and products on the environment. This includes deselecting raw materials because of known or suspected concerns.</p> <p>For further information, please refer to:  <a href="#">Audit Committee Charter</a>  <a href="#">Sustainability Policy</a>  <a href="#">Environmental Policy</a></p>
102-12	External Initiatives	<p>Operation Clean Sweep®            Ellen MacArthur Foundation New            Plastics Economy Global Commitment            Association of Plastic Recyclers            Recycling Demand Champions            Corporate Renewable Energy Buyers' Principles            Alliance to End Plastic Waste</p> <p>Science Based Targets Initiative            Wrap Recycling Action Program (W.R.A.P.)            Circular Economy for Flexible Packaging (CEFLEX)            Circular Plastics Alliance            Polyolefin Circular Economy Platform (PCEP)            Recoup            The UK Plastics Pact</p>
102-13	Membership of Associations	<p>We are members of several organizations, including:            Association of Plastic Recyclers (APR)            Association of the Nonwoven Fabrics Industry (INDA)            Plastic Recyclers Europe            European Disposables and Nonwovens Association (EDANA)            Flexible Film Recycling Group (FFRG)            Flexible Packaging Association (FPA)</p> <p>Foodservice Packaging Institute (FPI)            Plastics Industry Association (PLASTICS)            The Recycling Partnership            AMERIPEN (joined in 2020)            European Plastics Converters (EuPC)            INCPEN            The Packaging Federation</p>
<b>2. Strategy</b>		
102-14	Statement from Senior Decision-Maker	<a href="#">CEO's Message</a>
<b>3. Ethics and Integrity</b>		
102-16	Values, Principles Standards and Norms of Behavior	<a href="#">Code of Business Ethics</a> <a href="#">Supplemental Code of Ethics</a>
<b>4. Governance</b>		
102-18	Governance Structure	<a href="#">Corporate Governance</a>

# General Disclosures

Disclosure	Description	Response or Reference
<b>5. Stakeholder Engagement</b>		
102-40	List of Stakeholder Groups	Please refer to 102-46
102-41	Collective Bargaining Agreements	<a href="#">Form 10-K</a> p. 5 "Employees" Approximately 20% of employees are covered by collective bargaining agreements.
102-42	Identifying and Selecting Stakeholders	Please refer to 102-46
102-43	Approach to Stakeholder Engagement	Please refer to 102-46
102-44	Key Topics and Concerns Raised	Please refer to 102-46
<b>6. Reporting Practice</b>		
102-45	Entities Included in the Consolidated Financial Statements	This report covers all of our global operations for which Berry had operational control at the end of the reporting period, unless otherwise specified for specific indicators.
102-46	Defining Report Content and Topic Boundaries	<p>A sustainability assessment was performed in order to determine material aspects boundaries for all stakeholders in the long-term success of Berry.</p> <p><b>Internal Stakeholders</b></p> <p><b>Employees:</b> An Employee Sustainability Survey was previously sent to all employees, globally. The survey was translated into 8 languages to cover the native language of all of our global operations at the time of the survey. Employees were asked to evaluate each aspect in terms of importance both to the long-term sustainability of the Company as well as to the employee, personally.</p> <p><b>Berry:</b> Any aspects for which we have a Corporate initiative or policy were automatically considered material. Any aspects for which we were already publishing data were also automatically considered material.</p> <p><b>External Stakeholders</b></p> <p><b>Customers:</b> Our customers are one of our most critical stakeholders. We partner with them to ensure we are well-aligned. This reduces the risk of not being able to comply with evolving requirements. It also positions Berry to gain additional share. We determine customer priorities in a variety of ways, including direct engagement, annual survey, monitoring public commitments, and tracking what our customers ask us about in their surveys.</p> <p><b>Investors:</b> We directly engage with a number of our investors on ESG. Their feedback has been consistent with overall industry trends around ESG. Most of them look for Berry to report in alignment with industry frameworks, e.g. GRI, CDP, SASB. Many have also stressed the importance of improving ESG ratings - looking at factors considered material for our industry as a whole.</p> <p>In FY19, we had several investors ask about marine debris, including our efforts to prevent pellet loss. This was already a material topic, but outreach from the investor community increased its significance.</p> <p><b>Communities:</b> The communities in which we operate are a critical stakeholder. Community engagement is encouraged at the corporate level and managed at the local level.</p> <p><b>Suppliers:</b> Our suppliers are important partners that are critical to our long-term success. As one of the largest converters in the plastics industry, Berry is proud to work closely with our suppliers to ensure alignment and mutually define materiality for the plastics industry.</p> <p><b>NGOs:</b> We closely track press releases from non-governmental organizations (NGOs). We are also fortunate to have numerous direct engagements. Incorporating their input is important for reducing potential risk.</p>
102-47	List of Material Topics	<p><b>Economic:</b> Economic performance, ethical business practices</p> <p><b>Environmental:</b> Litter and marine debris, energy, greenhouse gas emissions, waste, water, recyclability of Berry's packaging</p> <p><b>Social:</b> Employee safety, regulatory compliance and product safety, employee training and education opportunities, reporting of ethics violations, and human rights</p>
102-48	Restatements of Information	Historical data may be modified to reflect changes in business structure, as well as improvements in data collection and accuracy.
102-49	Changes in Reporting	During the 2019 reporting period there was a significant change in reporting boundaries. In July 2019, Berry completed the acquisition of RPC Group, a leading plastic product design and engineering company for packaging and non-packaging markets, comprising of 189 sites in 34 countries. This report reflects data for the combined operations of legacy RPC and Berry for the 2019 reporting period.
102-50	Reporting Period	2019 Fiscal Year (October 1, 2018 - September 28, 2019) unless otherwise noted
102-51	Date of Most Recent Report	2018
102-52	Reporting Cycle	Annual, however we did not issue a GRI Index in 2018 because resources were instead focused on integration of our RPC acquisition

# General Disclosures

Disclosure	Description	Response or Reference
102-53	Contact Point for Questions Regarding the Report	Sustainability: <a href="#">Robert Flores</a> Corporate Communications: <a href="#">Eva Schmitz</a> Investor Relations: <a href="#">Dustin Stilwell</a>
102-54	Claims of Reporting in Accordance With the GRI Standard	This report has been prepared in accordance with the GRI Standards: Core option
102-55	GRI Content Index	This document is a standalone GRI content index.
102-56	External Assurance	We are not obtaining external assurance for our reporting at this time.

# 201 Economic Performance

Disclosure	Description	Response or Reference													
<b>Management Approach</b>		<a href="#">Corporate Governance</a>													
201-1	Direct Economic Value Generated and Distributed	<p>Please refer to: <a href="#">Form 10-K</a></p> <p>Berry is committed to its mission of 'Always advancing to protect what's important,' and proudly partners with its customers to provide them with value-added protective solutions that are increasingly light-weighted and easier to recycle or reuse.</p> <p>Beyond economic value, our products provide tremendous social value. Berry is a leading global supplier of a broad range of innovative rigid, flexible, and non-woven products. These include products for food and medical packaging, diapers, various sanitizing and disinfecting products, protective healthcare apparel, transportation/logistics-related products, and packaging for many other products that are essential to both consumer and industrial end markets.</p> <p>Many of our products also provide environmental benefits. We are working to better quantify our sales that have Environmental or Social benefits. Here is a summary of sales in our HH&amp;S division within Environmental or Social impact areas:</p> <table border="1"> <thead> <tr> <th>Pillar</th> <th>Impact Area</th> <th>FY19 Sales (\$MM)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Social</td> <td>Disease Prevention</td> <td>306</td> </tr> <tr> <td>Sanitation</td> <td>1,515</td> </tr> <tr> <td>Green Building</td> <td>118</td> </tr> <tr> <td rowspan="2">Environmental</td> <td>Pollution Prevention</td> <td>100</td> </tr> </tbody> </table>	Pillar	Impact Area	FY19 Sales (\$MM)	Social	Disease Prevention	306	Sanitation	1,515	Green Building	118	Environmental	Pollution Prevention	100
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Social	Disease Prevention	306													
	Sanitation	1,515													
	Green Building	118													
Environmental	Pollution Prevention	100													

# 205 Anti-Corruption

Disclosure	Description	Response or Reference
<b>Management Approach</b>		<p>It is the policy of Berry and its subsidiaries to conduct business in accordance with the highest ethical, moral, and legal standards. In so doing, we conduct our business efficiently, in good faith, with due care, and in the best interest of our Company, our employees, and our shareholders. Specific employee expectations are provided in our Code of Business Ethics.</p> <p>For more information, please visit: <a href="#">Code of Business Ethics</a> <a href="#">Supplemental Code of Ethics</a></p>
205-2	Communication and Training About Anti-Corruption Policies and Procedures	<p>The Code of Business Ethics (Code) is distributed to all employees, officers, and directors of Berry and other individuals designated by the Ethics Committee and/or the Audit Committee to receive the Code. All employees, officers, directors, and other such individuals receiving the Code are expected to read and familiarize themselves with the Code and are required to execute an Acknowledgment confirming they have received and read, understand, and agree to comply with the Code. Newly hired, promoted, or transferred employees are presented with the Code and asked to execute the Acknowledgment at the time they commence work at Berry or start their new position. From time to time, in order to re-emphasize our commitment to the Code, Berry may elect to redistribute the Code to all employees and have updated Acknowledgments signed.</p> <p>The CEO and all directors, presidents, executive vice presidents, and other officers/employees reporting directly to the CEO are required to sign a copy of the Company's Certification and Supplemental Code of Ethics (the "Supplemental Code"). The Supplemental Code, which is in addition to the standards set by our Code of Business Ethics, was created in order to establish a higher level of expectation for the most senior leaders of the Company.</p> <p>Furthermore, all employees are required to participate in annual compliance training covering a variety of subject matters, including the Berry Code of Business Ethics and global anti-corruption.</p>



Disclosure	Description	Response or Reference
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<p><b>Management Approach</b></p>	<p>Materials are at the heart of every product we manufacture. At Berry, we strive to provide the highest quality products and services that consistently exceed customers' expectations. We are motivated by our stakeholders to continually optimize our product designs to reduce material usage, thereby reducing natural resource consumption and minimizing overall lifecycle impacts.</p> <p>Our sustainability strategy, Impact 2025, highlights efforts in many areas related to materials:</p> <p>Lightweight products</p> <ul style="list-style-type: none"> <li>- Design 100% of packaging to be reusable, recyclable, or compostable</li> <li>- Achieve 10% recycled content across fast-moving consumer goods packaging</li> <li>- Encourage the development of renewable materials</li> </ul> <p>Reducing raw material usage by lightweighting products is the primary method we utilize to reduce our overall environmental impact. That is driven by our understanding of the impacts of our products over their lifecycles. This is consistently confirmed by lifecycle assessments (LCAs) of our products as well as our own GHG inventory (305-3). In order to minimize our environmental impacts, it is therefore critical that we minimize our raw material usage.</p> <p>Designing for recyclability as well as the use of recycled content are also critical to ensure the materials we use are part of the circular economy. Not only does recycling reduce waste, recycled content has been shown to significantly reduce GHG emissions. One of the most common inquiries we receive from our packaging customers is the recyclability of our products. Furthermore, many NGOs are critical of the packaging sector, because packaging is one of the most common sources of litter and marine debris. The recyclability of our products is clearly a material issue for not only Berry, but also for our stakeholders.</p> <p>We believe we can have the greatest direct impact on recycling by increasing our own demand for recycled content. That is why we have set a goal as part of our sustainability strategy, Impact 2025, to achieve 10% recycled content across our fast-moving consumers goods packaging.</p> <p>We believe we can have an even greater impact on recycling by partnering with other leading organizations (102-13) and initiatives (102-12). By bringing stakeholders together from across the value chain, we can truly shift the industry to a more circular economy. Additionally, we are active in many of the communities where we have facilities. We aim to educate community members on the benefits of plastics and the importance of recycling. We also support the research and development of practical and economical alternatives to conventional fossil fuel based raw materials. In general, alternatives to conventional resins have a significant premium, which has limited customer interest.</p> <p>For further information, please refer to:  <a href="https://www.berryglobal.com/sustainability/environment">https://www.berryglobal.com/sustainability/environment</a></p>	<p>Materials are at the heart of every product we manufacture. At Berry, we strive to provide the highest quality products and services that consistently exceed customers' expectations. 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<p><b>301-1</b></p>	<p>Materials Used by Weight or Volume</p>	<p>Our primary raw material is plastic resin. Globally, we purchase roughly seven billion pounds of resin per year. Most of the resin we purchase is made from fossil fuels. Although plastics made from renewable resources are available, such as polyethylene (PE) derived from sugar cane and poly(lactic acid) (PLA) derived from corn, bioplastics represent a low portion of our overall usage. In general, bioplastics cost more than conventional plastics, which has limited customer interest. The primary bioplastic we purchase is regenerated cellulose fibers used in our non-wovens, including viscose and rayon. Collectively, we purchased over 10,000 metric tons of bioplastics in 2019.</p> <p>In addition to resin, we use other materials such as butyl rubber, adhesives, paper and packaging materials, linerboard, polyester fiber, and foil in various manufacturing processes.</p> <p>For more information, please visit:  <a href="#">Form 10-K</a> p. 6 "Raw Materials"  <a href="#">Investor Presentation</a></p>
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# 301 Materials

Disclosure	Description	Response or Reference
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301-2

Recycled Input Materials Used

In FY2019, we purchased 70,000 metric tons (over 150 million pounds) of post-consumer resin (PCR). This does not include the recycling of our scrap back into our products. Our use of PCR significantly increased with the acquisition of RPC. We plan to leverage RPC's expertise in the use of recycled content to the other Berry divisions

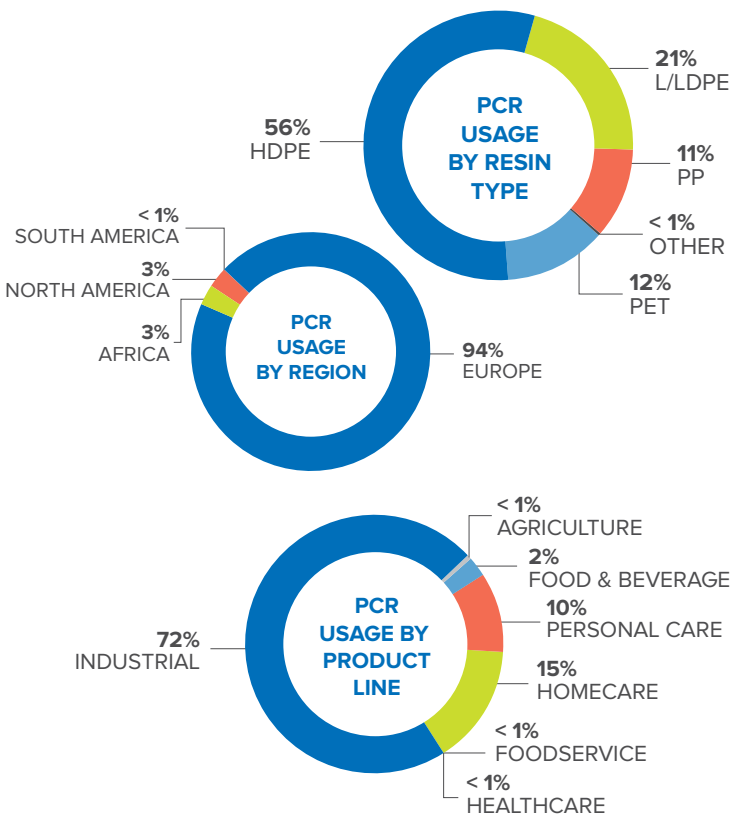
The recycled plastic we use in our products is summarized in these charts. Where we use recycled content is mostly a reflection of customer demand and regulatory requirements rather than being driven by where we offer recycled content.

In addition to the recycled content we consume in our products, we also have significant recycling operations that produce material both for internal consumption as well as external sales. In FY2019, **we recycled over 100,000 metric tons (over 200 million pounds) of post-consumer plastic within our recycling operations.** As customers express increased demand for recycled content, it is important for us to be able to source PCR both externally as well as through our own, vertically integrated, recycling operations.

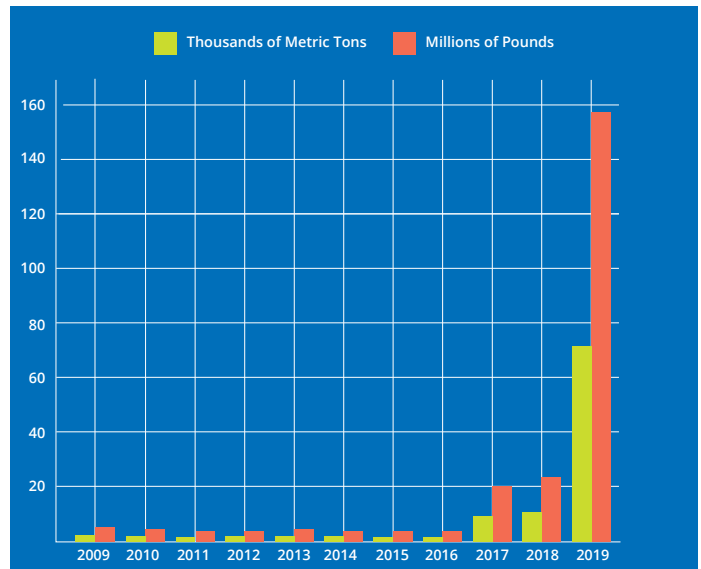
Finally, we also work to purchase products, such as plastic pallets, that contain recycled content. This further encourages recycling end markets and the circular economy. As evidence of our commitment to use recycled content in the items we purchase, we have been recognized by the Association of Plastics Recyclers as a Recycling Demand Champion.



Only the recycled plastic we use is considered material, although a significant portion of the paper-based products we purchase, such as cardboard boxes, is from recycled sources.



**POST-CONSUMER RESIN USAGE OVER TIME\***



\*This data is reflective of our PCR usage as reported in the reporting year. Historical data is not adjusted for acquisitions, but instead, is reflective of our business as it existed during the year indicated. FY19 includes full year reporting from RPC

Disclosure	Description	Response or Reference
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301-3

Reclaimed Products and Their Packaging Materials

### Recycling Access

Recycling access varies by country. In some cases, the materials accepted for recycling even vary between adjacent municipalities. We have reported on U.S. access because this is both where Berry is headquartered as well as home to the greatest number of our manufacturing sites.

The package types shown below are the primary products we manufacture that have recycling access. Recycling access for other products is minimal.

As part of our commitment to a circular economy, we believe it is important to report progress on the Ellen MacArthur Foundation New Plastics Economy Global Commitment. We are still refining our methodology for determining what percentage of our packaging is reusable, recyclable, or compostable; however, we currently estimate the following:

Reusable	< 1%
Recyclable	75%
Compostable	< 1%

This is based on our fast-moving consumer goods packaging, excluding sales of reusable packaging we produce for B2B applications.

Package Type	U.S. Recycling Access
HDPE Bottles	92%
PET Bottles	92%
PP Bottles	81%
LDPE Bottles	80%
PVC Bottles	78%
Bottle Caps	76%
PE Film	72%
PP Tubs/Containers	70%
HDPE Non-Bottle Rigids	65%
PP Cups	61%
PS Containers	60%
PP and PE Lids	54%
PS Lids	45%
Plastic Buckets	43%
PP and PS Cutlery	5%
PE Tubes	1%

Resource Recycling Systems and Moore Recycling Associates, Inc. "2015-16 Centralized Study on Availability of Recycling". 2016  
 Moore Recycling Associates Inc. "Plastic Recycling Collection National Reach Study: 2012 Update". 2013  
 Moore Recycling Associates, Inc. "Plastic Film and Bag Recycling Collection: National Reach Study". 2012

### Recycling Rates

Recycling rates vary by country. We have reported on U.S. access because this is both where Berry is headquartered as well as home to the greatest number of our manufacturing sites.

Package Type	U.S. Recycling Rate
PET Bottles	29%
HDPE Bottles	30%
HDPE Containers	21%
LDPE/LLDPE Bags, Sacks, and Wrap	18%
PP Containers	8%

Source: U.S. EPA. "Advancing Sustainable Materials Management: 2016 and 2017 Tables and Figures. 2019

The package types shown above are the only types for which U.S. recycling rate data is published by the U.S. EPA. In some cases, there may be meaningful recycling of product types not mentioned above, such as PP and PE lids. In most cases, recycling rates for package types not listed above are minimal.

Different package type categories are listed for the recycling rate data versus the recycling access data due to the fact that the data is from different sources which do not utilize the same terminology.





# 302 Energy

Disclosure	Description	Response or Reference
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## Management Approach

We strive to minimize our environmental footprint and conserve natural resources. Manufacturing is energy intensive; therefore, plastics, our primary raw material, are typically derived from energy sources such as natural gas. Taking this into consideration, energy conservation has become one of our top priorities.

As outlined in our sustainability strategy, Impact 2025, our goal is to reduce energy intensity by 1% per year. Although we have near-term energy reduction goals, we have a long-term vision to be "Best in Class" in energy efficiency as part of our efforts to achieve Operational Excellence.

For further information, please visit:

<http://www.berryglobal.com/sustainability-policy>

302-1	Energy Consumption Within the Organization		2018	2019			
				Excluding RPC Acquisition	RPC Acquisition	Total	Total (GJ)
		Electricity (MWh)	3,231,000	3,244,000	1,782,000	5,026,000	18,092,000
		Natural Gas (therm)	35,277,000	34,946,000	8,380,000	43,326,000	4,570,000
		Other (GJ)*	932,000	1,005,000	64,000	1,069,000	1,069,000
302-2	Energy Consumption Outside of the Organization	Total Energy (GJ)	16,286,000	16,368,000	7,363,000	23,731,000	23,731,000

1 MWh = 3.6 GJ = 34.13 therm

\*Other energy sources are only tracked for facilities that do not use natural gas. For facilities that use natural gas, other energy sources are de minimis and therefore not tracked.

302-3	Energy Intensity		2018	2019		
				Excluding RPC Acquisition	RPC Acquisition	Total
		Electricity (GJ/MT)	4.52	4.40	5.41	4.71
		Natural Gas (GJ/MT)	1.45	1.39	0.75	1.19
		Other (GJ/MT)	0.36	0.38	0.05	0.28
		Total Energy (GJ/MT)	6.33	6.16	6.21	6.18

MT = Metric Tons

Other energy sources are only tracked for facilities that do not use natural gas. For facilities that use natural gas, other energy sources are de minimis and therefore not tracked.

Product lightweighting negatively affects our efforts to reduce intensity metrics since volume processed is our preferred denominator for intensity.

302-4	Reduction of Energy Consumption	<p>Please refer to 302-1 through 302-3. Our absolute energy consumption was essentially flat, year-over-year, but our intensity decreased 3%. That indicates we were able to produce additional volume without increasing energy demand.</p> <p>Improvements in energy intensity are driven through our Berry Unplugged program. Through this program, we regularly share best practices to help sites reduce energy. Our sites implement hundreds of energy reduction project every year, ranging from simple lighting projects to significant capital investments to purchase newer, more efficient equipment.</p> <p>As indicated in 302-3, product lightweighting negatively affects our efforts to reduce energy intensity since volume processed is our preferred denominator for intensity metrics.</p>
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Disclosure	Description	Response or Reference
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**Management Approach**

We strive to minimize our environmental footprint and conserve natural resources. As freshwater is becoming more scarce, we aim to use this critical natural resource in a more sustainable way.

In order to better understand our water impact, we used the World Resources Institute's Aqueduct Water Risk Atlas to analyze water risk (including Physical Quantity, Physical Quality, and Regulatory and Reputational risks) for each of our manufacturing sites. The water risk for each site was communicated across the Company to help each site better understand their impacts and prioritize the importance of projects to reduce water consumption, especially in higher risk geographies.

As part of our Impact 2025 sustainability strategy, our goal is to reduce water intensity by 1% per year. Although we have a near-term water reduction goal, we have a vision to be "Best in Class" in water efficiency as part of our efforts to achieve Operational Excellence.

For further information, please visit:  
<http://www.berryglobal.com/sustainability-policy>

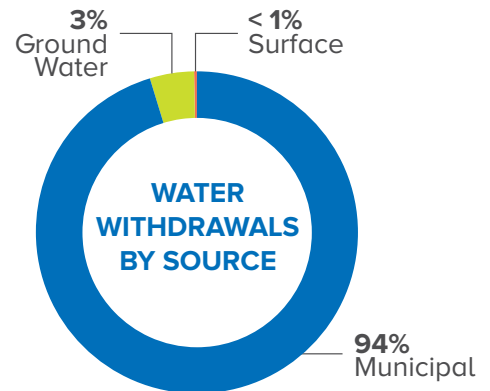
	2018	2019		
		Excluding RPC Acquisition	RPC Acquisition	Total
Water (m <sup>3</sup> )	4,747,000	4,316,000	696,000	5,012,000
Water Intensity (m <sup>3</sup> /MT)	1.85	1.63	0.59	1.30

MT=Metric Tons

In 2019, we reduced absolute water withdrawals by 9% and water intensity by 12%.

Most of our sites primarily use water for cooling. Some of our sites also use water for other processes, such as hydroentanglement of nonwoven fibers. Sites that use water for processes beyond cooling are typically our most water intensive.

Improvements in water intensity are driven through our Berry Unplugged program. Through this program, we share best practices and educate sites on ways to improve water efficiency, thereby reducing water intensity.



303-1

Water Withdrawal by Source

303-2

Water Sources Significantly Affected by Withdrawal of Water

Based on the criteria provided by GRI, we do not believe we are significantly affecting any water sources by the withdrawal of water.

303-3

Water Recycled and Reused

We are not currently able to directly measure water recycled at most of our facilities.

We believe it is important to recycle and reuse water; therefore, we do so at almost all of our manufacturing facilities. The vast majority of the water we use is for cooling. Since cooling water is not consumed, we are typically able to recirculate it multiple times. Additionally, water is recycled using reverse osmosis and boiler steam condensate return systems at many of our sites.

# 305 Emissions

Disclosure	Description	Response or Reference
<b>Management Approach</b>		<p>Our target, in line with our Impact 2025 sustainability strategy, is to reduce greenhouse gas emissions intensity 25% by 2025 versus our 2016 baseline. This target was set in line with the Science Based Targets initiative (SBTi).</p> <p>Several other targets from our Impact 2025 sustainability strategy also aim to reduce GHG emissions:</p> <p><b>Products</b> Lightweight products Design 100% of packaging to be reusable, recyclable, or compostable Achieve 10% recycled content across fast-moving consumer goods packaging Encourage the development of renewable materials</p> <p><b>Performance</b> Reduce greenhouse gas emissions intensity 25% by 2025 versus our 2016 baseline Reduce energy intensity 1% per year</p> <p><b>Partners</b> Increase renewable energy Expand the use of plastic in place of alternative materials Promote science-based targets</p> <p>We began calculating our Scope 1+2 GHG emissions for our 2008 reporting year as part of the U.S. EPA Climate Leaders program. Our 2008 and 2009 Scope 1+2 GHG inventory method and accuracy were both verified by the Climate Leaders program. We are not currently obtaining 3rd party assurance for our GHG emissions.</p> <p>We initially calculated the Scope 1 GHG emissions for all Scope 1 sources. We later determined only our natural gas consumption was material and all other sources of Scope 1 GHG emissions were de minimis. For any manufacturing sites that do not use natural gas, we track their consumption of "Other" energy sources, such as propane or diesel, since those are material sources of Scope 1 GHG emissions for those individual sites. Those Other energy sources are then included in our overall GHG inventory. To understand the scale of our Other energy sources versus natural gas, please refer to 302-1.</p> <p>We first disclosed our Scope 1+2 GHG emissions to CDP starting in 2010, as part of the Supply Chain program. We have reported our GHG emissions to CDP every year since, and after we became a publicly traded Company, began also responding to the Climate Change survey.</p> <p>In 2015, we began calculating Scope 3 GHG emissions. Full detail of our Scope 3 GHG emissions is available in our CDP responses, including the method used to estimate the GHG emissions for each source. Many of the commonly used methodologies for calculating Scope 3 emissions can yield order of magnitude different results. Therefore, we primarily use our Scope 3 GHG emissions to understand their relative scale rather than putting credence in the actual values.</p> <p>For further information, please visit: <a href="http://www.berryglobal.com/sustainability-policy">http://www.berryglobal.com/sustainability-policy</a> <a href="https://www.cdp.net/">https://www.cdp.net/</a> <a href="https://sciencebasedtargets.org/">https://sciencebasedtargets.org/</a></p>

# 305 Emissions

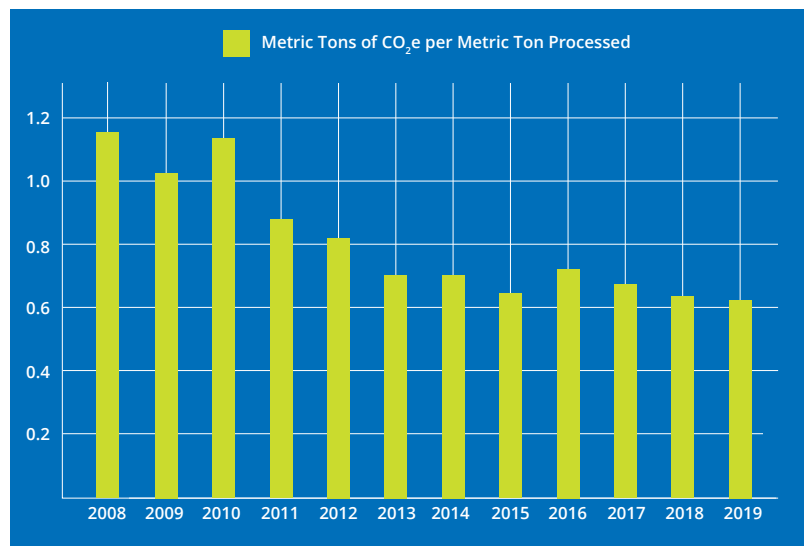
Disclosure	Description	Response or Reference		
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	2018	2019		
		Excluding RPC Acquisition	RPC Acquisition	Total
Scope 1 GHG Emissions (MT CO <sub>2</sub> e)	237,000	240,000	69,000	309,000
Scope 2 GHG Emissions (MT CO <sub>2</sub> e)	1,440,000	1,449,000	682,000	2,131,000
Scope 1+2 GHG Emissions Intensity (MT CO <sub>2</sub> e/MT Processed)	1,678,000	1,670,000	751,000	2,441,000
Total GHG emissions intensity (MT CO <sub>2</sub> e/MT)	0.65	0.64	0.63	0.64

MT = metric tons  
CO<sub>2</sub>e = CO<sub>2</sub> equivalents

- 305-1 Direct (Scope 1) GHG Emissions
- 305-2 Energy Indirect (Scope 2) GHG Emissions

## SCOPE 1 + 2 GHG EMISSIONS INTENSITY TREND



This data is reflective of our GHG Emissions Intensity as reported in the reporting year. Historical data is not adjusted for acquisitions, but instead, is reflective of our business as it existed during the year indicated.

# 305 Emissions

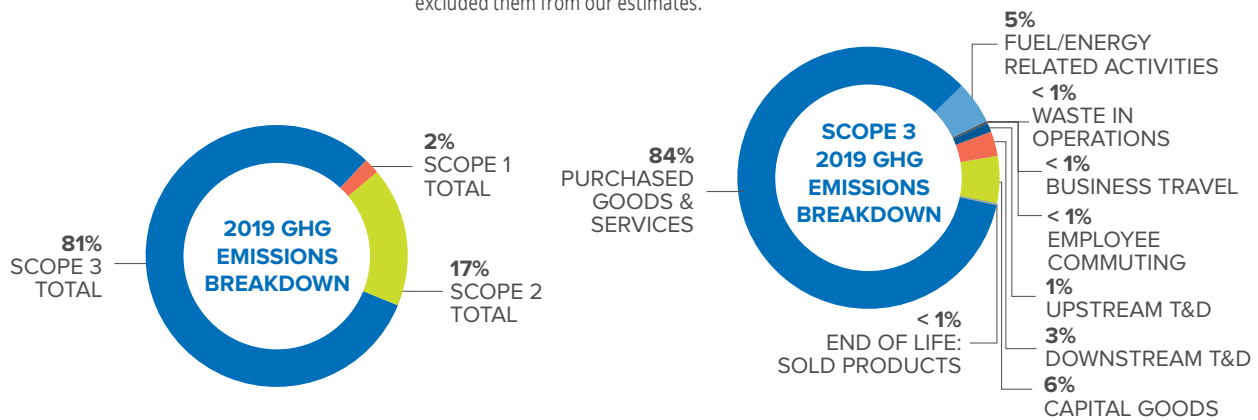
Disclosure	Description	Response or Reference
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**305-3** Other Indirect (Scope 3) GHG Emissions

Total Scope 3 GHG Emissions = 10.5 million metric tons CO<sub>2</sub>e

As discussed in the Management Approach for this section, we primarily use our Scope 3 GHG emissions to understand the relative scale vs. Scopes 1 and 2. Full detail of our Scope 3 GHG emissions is available in our CDP response, but the relative comparison here shows that Scope 3 is by far our largest source of total GHG emissions.

Purchased goods and services is by far the largest source of our Scope 3 emissions, primarily driven by the resin we purchase. Combining Scopes 1-3, Purchased goods and services represents 68% of our total footprint. The processing and use of sold products are de minimis in the lifecycle of most of our products. We have therefore excluded them from our estimates.



**305-4** GHG Emissions Intensity

Please refer to 305-1 and 305-2.

GHG emissions for each year are calculated based on the most current emissions factors available at the time. Once published, historical GHG emissions are not modified for updated emissions factors.

Product lightweighting negatively affects our efforts to reduce intensity metrics because 1) our volume processed is our preferred denominator for intensity normalization, and 2) lighter parts are more energy intensive to produce across most of our conversion processes.

**305-5** Reduction of GHG Emissions

Please refer to 305-1, 305-2, and 305-4.

Our absolute Scope 1+2 GHG emissions were roughly the same in 2019 vs. 2018, excluding RPC. Our GHG emissions intensity for the same period was down 2.5%, excluding RPC, indicating we were able to increase production without increasing GHG emissions.

Including RPC, absolute emissions increased vs. 2018; however, emissions intensity reduced 2.6% vs. 2018.

Compared to our 2016 baseline, we have reduced GHG emissions intensity 14%. We are ahead of schedule for achieving the 25% reduction by 2025 we set in line with the Science Based Targets initiative (SBTi).

**Electricity** is our largest source (87%) of Scope 1+2 GHG emissions. To reduce GHG emissions from an operations standpoint, we therefore focus on reducing energy. Therefore, please refer to 302-4 for discussion on our energy reduction efforts. Beyond our efforts to reduce energy consumption, we recognize that purchase of renewable energy is the best to reduce our Scope 1+2 emissions. We continually evaluate opportunities both on-site and off-site to purchase renewable energy. To date, we have signed several power purchase agreements for renewable energy. These have enabled the generation of roughly 24,000 MWh of renewable energy - the equivalent of over 40,000 barrels of oil - however, we do not own the renewable energy certificates for these projects. Despite contributing to additionality, we are unable to reduce our greenhouse gas emissions correspondingly.

**Resin** (Purchased goods and services) was our largest source (68%) of total GHG emissions (Scopes 1-3). To reduce GHG emissions from a design/product development perspective, we therefore focus on lightweighting our products. We also have initiatives to increase recycled content, improve product recyclability, and encourage renewable materials, which would further reduce the Scope 3 emissions associated with our Purchased goods and services.

# 306 Effluents and Waste

Disclosure	Response or Reference
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In accordance with our waste management hierarchy, we strive to minimize waste generation. For any waste that is generated, we aim to recover it in the most environmentally responsible manner, which typically also retains the highest economic value.

We not only consider our direct waste; we also consider the entire life cycle of our products. At Berry, we support the research and development of practical and economical end of life scenarios for our products, such as recycling, which can prevent items from accumulating in landfills or the natural environment as litter or marine debris.

We recognize that litter and marine debris are material environmental issues. Despite the value our products bring-Protecting What's Important-when plastic ends up in the natural environment as litter or marine debris, it can have a significant environmental impact. As a manufacturer of plastic products, we endeavor to reduce the amount of plastics, including our products and the plastic resin we use as a raw material to make those products, that can end up in the natural environment.

We have the most influence on plastic resin ending up in the environment, because it is within our direct control. This is why we have taken the Operation Clean Sweep® (OCS) pledge. OCS is a commitment to strive toward zero resin pellet, powder, and flake loss.

As part of our commitment to OCS, we regularly communicate the importance of preventing resin loss to all of our sites. We also share best practices to assist in this effort. Furthermore, we hold our resin suppliers accountable for implementing Operation Clean Sweep® in their facilities.

After our products are outside of our direct control, it is more difficult to influence whether or not they end up in the environment as litter or marine debris. As a leader in the transition to a circular economy, we work with many leading organizations (102-13) and game-changing initiatives (102-12) to encourage post-consumer plastic recycling. These include the Alliance to End Plastic Waste and Ellen MacArthur Foundation New Plastics Economy Global Commitment. By supporting these important efforts, we hope that we can give value to plastic waste and truly achieve a circular economy.

Many of the goals laid out in our Impact 2025 sustainability strategy target this area:

**Products**

Design 100% of packaging to be reusable, recyclable, or compostable  
Achieve 10% recycled content across fast-moving consumer goods packaging

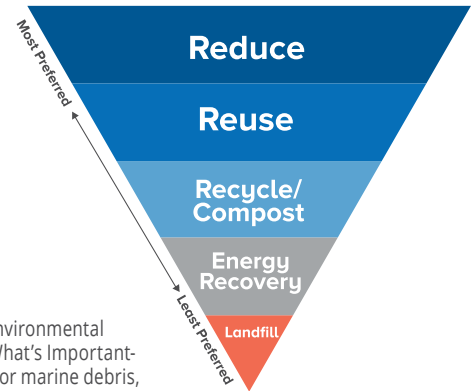
**Performance**

Reduce landfill waste intensity 5% per year  
Prevent resin loss through OCS  
Implement OCS at acquisition sites within the first year

**Partners**

Expand and modernize waste infrastructure to increase recovery and prevent loss of plastic to the environment  
Engage the plastics industry on OCS

For further information, please refer to:  
<https://sustainability.berryglobal.com/>  
<http://www.berryglobal.com/sustainability-policy>



**Management Approach**

**Linear Economy**



**Circular Economy**



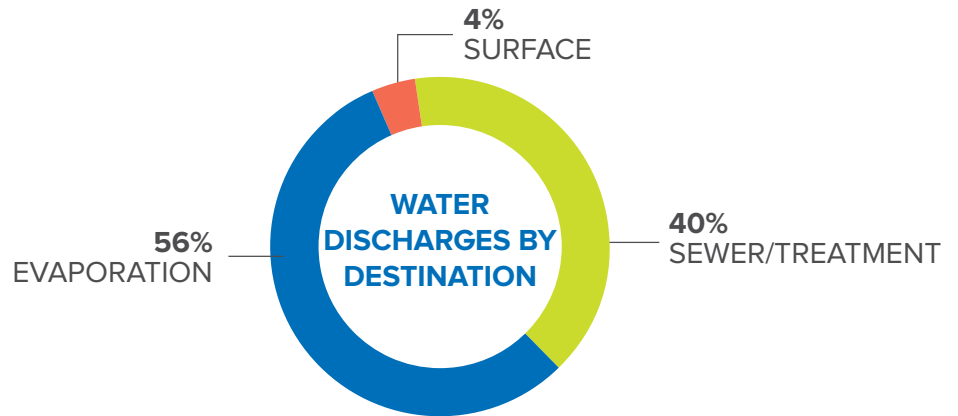


# 306 Effluents and Waste

Disclosure	Description	Response or Reference
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306-1

Water Discharge by Destination



	2018	2019*
Landfill Waste (MT)	21,300	19,200
Waste Intensity (MT landfilled per MT processed)	0.83%	0.72%

MT = metric ton  
 \*2019 data excludes RPC acquisition

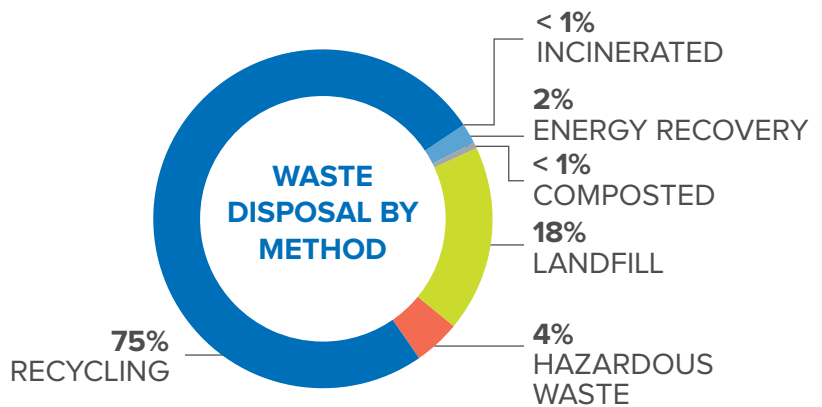
Reductions in landfill waste generation are driven through our waste reduction initiative. Through this program, we regularly share best practices and information to support our sites with their efforts to reduce waste.

As can be seen in the chart to the right, we are able to recycle the vast majority of waste we generate because plastics are readily recyclable. Most of our collective landfill waste comes from sites that produce multi-material structures that often lack recycling outlets. As we strive for 100% of our packaging to be reusable, recyclable, or compostable, we believe we will be able to recycle an even higher percentage of our manufacturing waste.

Despite continued challenges in recycling markets, we were able to reduce our absolute landfill waste by 10% and achieve a 13% reduction in landfill waste intensity.

306-2

Waste by Type and Disposal Method



# 308 Supplier Environmental Assessment

Disclosure	Description	Response or Reference
<b>Management Approach</b>		<p>We, along with our affiliates, divisions, and subsidiaries strive to conduct business in a responsible manner. As we expand upon our global activities abroad and work with suppliers worldwide to meet customers' needs, it is important to preserve our collective commitment to human rights in the workplace as well as a safe work environment.</p> <p>In order to continue to honor these values and principles, we have decided to conduct business only with suppliers who share a similar commitment. We have created a Supplier Code of Conduct to outline what we expect from our suppliers with respect to labor and employment rights, environmental health and safety, ethics and social responsibility, and global trade practices. Suppliers are expected to adhere to our Supplier Code of Conduct, and must operate in full compliance with all applicable laws and regulations. When local laws and regulations are less restrictive than our Supplier Code of Conduct, we expect suppliers to adhere to our principles. Failure to comply with internationally recognized standards and the standards set forth in our Supplier Code of Conduct may result in the termination of our business relationship. Berry may conduct on-site audits to ensure compliance with our Supplier Code of Conduct.</p> <p>For further information, please refer to:  <a href="#">102-9 Supplier Code of Conduct</a>  <a href="#">Purchase Order Standard Terms and Conditions</a></p>
<b>308-1</b>	New Suppliers That Were Screened Using Environmental Criteria	<p>New suppliers are initially screened for compliance with our Supplier Code of Conduct. Key suppliers are also required to recertify compliance annually. We are in the process of implementing a new system that would allow us to recertify all active vendors annually.</p> <p>We also specify supplier expectations in our Purchase Order Standard Terms and Conditions.</p>

# 401 Employment

Disclosure	Description	Response or Reference
<b>Management Approach</b>		<p>We believe that our employees are our most valuable asset. In fact, we attribute our success as a Company in significant part to our ability to recruit, hire, retain, and develop a positive and productive workforce. We are committed to creating a workplace where ideas, energy, teamwork, and dedication fuel our success and where all employees can thrive and meet their potential.</p>
<b>401-2</b>	Benefits	<p>We have a long history of profit sharing with our employees. Embedded in our culture, this philosophy is one of many practices that have enabled us to continuously focus on growth, improvement, and success. Excluding the recently acquired RPC Group—more than 20,000, or 84%, of our 24,000 hourly and salaried employees—participate in variable incentive pay programs each year.</p>

# 402 Labor/Management Relations

Disclosure	Description	Response or Reference
Management Approach	July 1, 2020 marks the one year anniversary of the transformational merger of Berry and the RPC Group. During the course of the year, our teams have worked together seamlessly to successfully integrate business processes and translate best practices. As publicly reported to the UK Takeover Commission on July 1, 2020, the intended operational and administrative restructuring activities have been completed successfully and are in compliance with our Intention Statements, including a limited reduction in employment of less than 0.5% across the combined group. During the year, we have worked closely with the heritage RPC-European Works Council, which supported the post acquisition integration, strategy, and communication to heritage RPC employees.	For further information, please refer to: <a href="https://www.berryglobal.com/careers">https://www.berryglobal.com/careers</a>

# 403 Occupational Health and Safety

Disclosure	Description	Response or Reference
Management Approach	The safety of our employees and contractors is our number one priority and core value at Berry. Due to the fact that we continually transform our safety practices and procedures, our employees have reduced the incident rate to be far below the industry average of 3.8.	
	We believe that education and empowerment are fundamentals to a safe working environment in every facility. Day-one orientation includes a general safety training course for new employees and contractor initial visits. To supplement every employee's education of safety according to their specific responsibilities, we also offer mandatory online courses through Berry University.	
	At Berry, we are committed to conducting our operations with the highest regard for the safety and health of our employees, the public, our customers, and the protection and preservation of the environment. We believe that injuries and environmental impacts can be eliminated through effective awareness, training, accountability, and compliance. It is the direct responsibility, dedication, and commitment of all Berry employees to maintain a safe workplace and support the sustainability efforts.	
	For further information, please refer to: <a href="#">Environmental, Health and Safety Vision &amp; Policy</a>	

403-2	Types of Injury and Rates of Injury, Occupational Diseases, Lost Days, and Absenteeism, and Number of Work-Related Fatalities	<p>We track our total recordable incident rate as our key performance indicator for this disclosure. Our recordable incident rate is calculated using U.S. OSHA's classification criteria.</p> <p>Industry average is based on the incident rate of nonfatal occupational injuries and illnesses for Plastics Product Manufacturing (NAICS 3261) as published by the United States Department of Labor's Bureau of Labor Statistics: <a href="https://www.bls.gov/iif/oshsum.htm">https://www.bls.gov/iif/oshsum.htm</a></p>	<p><b>OSHA RECORDABLE INCIDENT RATE</b></p> <table border="1"> <caption>OSHA Recordable Incident Rate Data</caption> <thead> <tr> <th>Year</th> <th>Berry</th> <th>Industry Average</th> </tr> </thead> <tbody> <tr> <td>2014</td> <td>1.26</td> <td>4.60</td> </tr> <tr> <td>2015</td> <td>1.27</td> <td>4.20</td> </tr> <tr> <td>2016</td> <td>1.40</td> <td>3.90</td> </tr> <tr> <td>2017</td> <td>1.22</td> <td>3.90</td> </tr> <tr> <td>2018</td> <td>1.20</td> <td>3.80</td> </tr> <tr> <td>2019</td> <td>1.09</td> <td>3.80*</td> </tr> </tbody> </table> <p>*2019 industry average data is not yet available. 2018 data was used as an estimate.</p>	Year	Berry	Industry Average	2014	1.26	4.60	2015	1.27	4.20	2016	1.40	3.90	2017	1.22	3.90	2018	1.20	3.80	2019	1.09	3.80*
Year	Berry	Industry Average																						
2014	1.26	4.60																						
2015	1.27	4.20																						
2016	1.40	3.90																						
2017	1.22	3.90																						
2018	1.20	3.80																						
2019	1.09	3.80*																						

# 404 Training and Education

Disclosure	Description	Response or Reference
<p><b>Management Approach</b></p> <p><b>404-2</b></p>	<p>Programs for Upgrading Employee Skills and Transition Assistance Programs</p>	<p>As a Company, we believe that it is the cumulative success of our thousands of employees around the globe that fosters excellence within our organization. Success in their respective jobs helps us ensure excellence in innovation, quality, customer satisfaction, and much more, which ultimately fuels the overall success of Berry.</p> <p>Berry is committed to developing our team members from shop floor to executive level with both in-person and eLearning development programs. Programs include leadership and skill building to drive internal promotability and career development.</p> <p>Berry University: skill and competency building eLearning platform available to all employees via computer and mobile device. Courses are designed to upskill employees for accelerating success in current role as well as prepare them for future leadership positions. (24,500 participants in 2019)</p> <p>Leadership Foundations: front-line supervisor and individuals with the potential and desire to become supervisors. 20 manager skill courses that are taught at local level by HR and Plant leaders. Each 1.5 hour course covers basic leadership concepts and tools needed for success in the supervisory role (examples include: problem solving, interview skills, providing feedback, etc.) These courses are available in 8 languages. (1275 participants in 2019)</p> <p>Leadership Development Program (heritage Berry): three day instructor-led leadership competency workshop delivered 2-3 times per year in all of Berry's primary geographies (including US, Mexico, South America, Europe and Asia) for Manager and Director-band employees. Course includes Situational Leadership, Building Trust, MBTI, Leading Change and interactions with senior leaders. (300 participants in 2019)</p> <p>CPI Bronze Development Program (heritage RPC): 9-month leadership development program for high potential individual contributors targeted for leadership positions. Includes modules on execution, leadership, lean Six Sigma principles, and problem solving. (15 participants 2019)</p> <p>CPI Silver Development Program (heritage RPC): 12-month development program for high potential Managers and Directors targeted for senior leadership positions. Includes three facilitator-led sessions and a project requirement. (20 participants in 2019)</p> <p>International Graduate Development Program (heritage RPC): program designed for recent graduates entering the manufacturing field. Program extends over two years with eight interactions providing development in communication skills, team effectiveness, managing change and inspirational leadership. (17 graduates in 2018, hiatus 2019))</p> <p>Executive Development Program: 10-month developmental program for EVPs and VPs to provide global exposure and enterprise thinking. Participants must solve a real-time Berry issue through collaboration with local leadership and strategic thinking capability. Includes educational sessions with global business schools. (hiatus 2019, 15 in 2018)</p> <p>Core Selling Capabilities: development program for employees new to selling roles or new to Berry. Includes the Berry sales process and key account management process. Facilitator-led courses held in US, EU and China. (90 participants in 2019)</p> <p>Advanced Selling Capabilities: sales development program for tenured sales professionals. Case study based focus on selling value and negotiation skills training. Facilitator-led courses in US and EU. (65 participants in 2019)</p> <p>Finance for Sales Professionals: simulation-based course for sales professionals used as a deep dive into P&amp;L levers which can be used when negotiating with customers. 3rd party deliver in US, EU and South America. (75 participants 2019)</p> <p>Operations Development Program: newly launch program to develop new to Berry Plant Directors and internal successors to the Plant Director role. Focus is on leading team, driving engagement, financial acumen, safety, quality and sustainability. Delivered in US and EU (55 participants in 2019)</p> <p>7 Habits for Managers: Franklin Covey course facilitated internally as an independent course. Focus is on maximizing the contributions of the team to overdrive deliverables. (40 participants in 2019)</p> <p>Building your Career at Berry: workshop designed for emerging talent on how to self-develop and prepare for the next career step. (85 participants in 2019)</p> <p>360 assessment and feedback: Berry provides three levels of 360 assessment and feedback. (1) Individual contributor level, (2) Manager and Director, (3) senior executive utilizing OPTM 360s and Center for Creative Leadership 360s.</p> <p>Additionally Berry conducts deep dive succession planning calibration sessions, reviewing more than 1200 employees on an annual basis. Sessions are followed with 12-month individual development plans for each leader reviewed."</p> <p>For further information, please visit:  <a href="http://www.berryglobal.com/careers">http://www.berryglobal.com/careers</a></p>

## 405 Diversity and Equal Opportunity

Disclosure	Description	Response or Reference
<b>Management Approach</b>		<p>At Berry, we understand that we are made better by the diversity that exists within our Company and our communities. We believe that our differences and unique qualities allow us to generate innovative ideas and be better problem solvers.</p> <p>As an organization, through our plugIN Diversity and Inclusion Network and its initiatives, we will continually prioritize the development of a thoughtful, diverse workplace where all are accepted and have the opportunity to thrive and equally contribute to the success of our Company.</p> <p>For further information, please refer to: <a href="https://www.berryglobal.com/careers/plugin">https://www.berryglobal.com/careers/plugin</a></p>

## 407 Freedom of Association and Collective Bargaining

Disclosure	Description	Response or Reference
<b>Management Approach</b>		<p>Berry respects the freedom of association. We will cooperate in good faith with the trade unions that represent our employees within the appropriate national legal frameworks.</p> <p>For further information, please visit: <a href="#">Global Human Rights and Labor Standards Policy</a></p>

## 408 Child Labor

Disclosure	Description	Response or Reference
<b>Management Approach</b>		<p>Berry does not allow child labor in its operations. We also believe children should not be forced or coerced into trafficking, bonded labor or servitude. The term "child" means any person under the minimum legal age for being employed in the workplace, which in most instances is fifteen (15) years of age. Typically, Berry does not hire anyone under the age of eighteen (18) unless apprenticeships or internships are permitted by local law.</p> <p>For further information, please visit: <a href="#">Global Human Rights and Labor Standards Policy</a></p>

## 409 Forced or Compulsory Labor

Disclosure	Description	Response or Reference
<b>Management Approach</b>		<p>Berry respects the rights of all people, so we will not use or engage in any form of coerced, bonded or indentured labor. All work will be voluntary, and employees will be free to leave or terminate their employment in accordance with local and national laws without fear of physical, psychological, sexual, or verbal abuse.</p> <p>Berry prohibits the use of slavery and human trafficking in our facilities, by our suppliers and business partners. Slavery includes forced labor, in addition to bonded labor and domestic servitude.</p> <p>Berry will not require employees to lodge "deposits" of their identity papers (e.g., government-issued identification, passports, or work permits).</p> <p>For further information, please visit: <a href="#">Global Human Rights and Labor Standards Policy</a></p>

## 412 Human Rights

Disclosure	Description	Response or Reference
<b>Management Approach</b>		<p>Berry Global Group, Inc. and its subsidiaries (collectively, "Berry") strive to maintain a working environment, both internally and through our suppliers, that conducts its personnel practices in a manner designed to respect the human rights for all individuals and ensure equal opportunities. Berry operates in accordance with applicable laws and labor standards, Berry policies, and Berry's Code of Business Ethics</p> <p>For further information, please visit:  <a href="#">Global Human Rights and Labor Standards Policy</a></p>

## 414 Supplier Social Assessment

Disclosure	Description	Response or Reference
<b>Management Approach</b>		<p>Berry Global Group, Inc. our affiliates, divisions, and subsidiaries strive to conduct business in a responsible manner. As we expand our business activities abroad and work with suppliers globally to meet customers' needs, it is important to preserve our collective commitment to human rights in the workplace as well as to a safe work environment.</p> <p>In order to continue to honor these values and principles, we have decided to conduct business only with suppliers who share a similar commitment. We have created a Supplier Code of Conduct to outline what we expect from our suppliers with respect to labor and employment rights, environmental health and safety, ethics and social responsibility, and global trade practices. Suppliers are expected to adhere to our Supplier Code of Conduct and must operate in full compliance with all applicable laws and regulations. When local laws and regulations are less restrictive than our Supplier Code of Conduct, we expect suppliers to adhere to our principles. Failure to comply with internationally recognized standards and the standards set forth in our Supplier Code of Conduct may result in the termination of our business relationship. Berry may conduct on-site audits to ensure compliance with our Supplier Code of Conduct.</p> <p>For further information, please refer to:            102-9  <a href="#">Supplier Code of Conduct</a>  <a href="#">Global Acquisition and Accountability Policy</a>  <a href="#">Modern Slavery Act Statement</a>  <a href="#">Purchase Order Standard Terms and Conditions</a></p>
<b>414-1</b>	New Suppliers That Were Screened Using Social Criteria	<p>New suppliers are initially screened for compliance with our Supplier Code of Conduct. Key suppliers are also required to recertify compliance annually. We are in the process of implementing a new system that would allow us to recertify all active vendors annually.</p> <p>We also specify supplier expectations in our Purchase Order Standard Terms and Conditions.</p>

## 416 Customer Health and Safety

Disclosure	Description	Response or Reference
<b>Management Approach</b>		<p>Berry maintains the highest possible standards of product stewardship to ensure the safe and responsible utilization of materials in enhancing the quality of life through design and development.</p> <p>For further information, please refer to:  <a href="#">Product Stewardship Policy</a>  <a href="#">Continuous Improvement Quality Policy</a></p>



Disclosure	Description	Response or Reference
<p>416-1</p>	<p>Assessment of the Health and Safety Impacts of Product and Service Categories</p>	<p><b>Chemical Safety</b></p> <p>Berry has an active and robust product safety program. All newly proposed raw materials are subjected to a regulatory review screening process. This involves collecting safety documents and detailed regulatory disclosures from the manufacturer/supplier of the raw material. Prior to purchase, every proposed raw material is subjected to regulatory screening to identify regulatory constraints, EHS concerns, freedom to operate, compatibility with other raw materials and suitability for intended end uses. The results of the screening are used to make purposeful decisions regarding purchase. Many proposed new raw materials are rejected each year and do not become part of the raw material portfolio.</p> <p>Raw material product literature is loaded into systems where all Berry employees can access as needed. Regulatory information for each approved raw material is linked with the assigned raw material item number and loaded into the Enterprise Resource Planning (ERP) system.</p> <p><b>Monitoring Regulation</b></p> <p>Berry actively monitors regulatory activity, which could affect Berry operations and products. Berry uses subscription-based service, participation in trade associations, list server notifications, weekly newsletters from regulatory agencies and regulatory alerts from law firms to stay aware of proposed and new regulatory rules. This allows Berry to assess the potential business impact from new regulations, an opportunity to comment on proposed legislation and implement actions required to assure compliance.</p> <p>In cases where new regulations have an impact on existing products, Berry works with its suppliers to identify alternate raw materials and/or develop new products, which meet the new requirements. Berry often reaches out to suppliers requesting reformulated raw materials to eliminate certain regulated chemicals or move to chemicals that reduce the overall environmental and social impacts of Berry products.</p> <p><b>Berry Finished Goods</b></p> <p>Berry provides product regulatory information on-demand for any finished good in Berry's portfolio. Berry uses regulatory information collected from raw material suppliers for each raw material present in the composition and provides regulatory information for the finished good(s) of interest.</p> <p>Berry has partnered with many customers to reformulate existing products to remove specific substances. This work improves consumer safety and reduces regulatory risk for both Berry and our customers. In some cases, Berry has recommended changed proactively. In other cases, changes were driven by a customer's Restricted Substance List (RSL) or Substances of Interest (SOI) list.</p> <p><b>Product Testing</b></p> <p>Berry conducts testing, as needed, to verify product safety and demonstrate regulatory compliance. Examples include:</p> <ul style="list-style-type: none"> <li>Biocompatibility testing for nonwoven products used in healthcare and hygiene applications</li> <li>Food and drug contact compliance, on multiple continents</li> <li>Consumer Product Safety Commission (CPSC) testing for child resistant closures</li> </ul> <p><b>Product Registration/Certification</b></p> <p>Berry holds numerous product registrations/certifications across our many product lines and broad geographical footprint.</p> <p><b>Management of Change</b></p> <p>Berry has an active Management of Change (MOC) program to assure that changes to finished goods meet all regulatory requirements, customer specification and contract conditions, product functionality, performance equivalence, and safety. Our MOC program minimizes the likelihood of risk when changes are made.</p> <p><b>Policies</b></p> <p>Berry established internal product policies including:</p> <ul style="list-style-type: none"> <li>Implant and Fluid – Tissue Contact Application</li> <li>California Proposition 65</li> <li>Pesticide (ingredients and products)</li> <li>Product Stewardship</li> </ul> <p>Additionally, the following documents are available externally:</p> <ul style="list-style-type: none"> <li><a href="#">CTSCA – Global Acquisition and Accountability Policy</a></li> <li><a href="#">Modern Slavery Act Transparency Statement</a></li> <li><a href="#">Code of Business Ethics</a></li> <li><a href="#">Supplier Code of Conduct</a></li> <li><a href="#">Terms and Conditions</a></li> </ul>