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 | | | | | | | | |
|----------------------|-----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------|------------------|--------|-------|--------|--|--|--|
| Organization Profile | | | | | | | | | | |
| 102-1 | Name of the Organization | Berry Global Group, Inc. (BERY) | | | | | | | | |
| 102-2 | Activities, Brands, Products, and Services | | <u>Form 10-K</u> p. 3-5 "Segment Overview" Brands: <u>http://www.berryglobal.com/our-brands</u> | | | | | | | |
| 102-3 | Location of Headquarters | Evansville, Indiana, USA | | | | | | | | |
| 102-4 | Location of Operations | Form 10-K p. 10 "Properties" | | | | | | | | |
| 102-5 | Ownership and Legal Form | Berry Global is a publicly traded com | ipany (NYSE: BER | Y) | | | | | | |
| 102-6 | Markets Served | Form 10-K p. 3 "General" http://www.berryglobal.com/market | S | | | | | | | |
| 102-7 | Scale of the Organization | Form 10-K Total Number of Employees: Approx Total Number of Facilities: 290 Net Sales: \$13 Billion Quantity of Products: 100,000+ SKUs | - | | | | | | | |
| | | | North America | South America | EMEIA | Asia | Total | | | |
| | | Female Employees | 6,185 | 128 | 5,690 | 1,965 | 13,968 | | | |
| 102-8 | Information on Employees and | Male Employees | 14,853 | 892 | 14,901 | 3,308 | 33,954 | | | |
| 102-0 | Other Workers | Total Employees | 21,038 | 1,020 | 20,591 | 5,273 | 47,922 | | | |
| | | Temporary Employees (FTE) | 1,061 | 40 | 2,384 | 499 | 3,984 | | | |
| | | As of September 28th, 2019 EMEIA = Europe, Middle East, India, and A FTE = Full Time Equivalent | frica | | | | | | | |



General Disclosures

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|-----------------------------|--------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|
| 1. Organization Profile (co | ntinued) | | | | | | |
| | | materials, including butyl rubber, adhesives, paper and | ork very closely with our resin suppliers. We use additional packaging materials, linerboard, rayon, polyester fiber, ices for our global operations from suppliers around the | | | | |
| 102-9 | Supply Chain | In FY19, we acquired RPC Group. The procurement groups of the two legacy companies have been working close 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. | | | | | |
| | | Berry and RPC had similar strategies for supplier engag suppliers, and 3) the top 100-150 suppliers, representin | | | | | |
| | | Berry manages top suppliers by category through our B formally documents supplier performance semi-annual this program to closely evaluate and improve supplier p | ly. Executive management and commodity managers use | | | | |
| 102-10 | Significant Changes to the Organization and Its Supply Chain | <u>Form 10-K</u> p. 13-14 "Recent Acquisitions" | | | | | |
| | | The Audit Committee of the Board of Directors has over management practices of the Company. | rsight responsibility for risk assessment and risk | | | | |
| 102-11 | Precautionary Principle or Approach | 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. | | | | | |
| | | For further information, please refer to: <u>Audit Committee Charter</u> <u>Sustainability Policy</u> Environmental Policy | | | | | |
| 102-12 | External Initiatives | 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 | 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 | | | | |
| 102-13 | Membership of Associations | 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) | Foodservice Packaging Institute (FPI) Plastics Industry Association (PLASTICS) The Recycling Partnership AMERIPEN (joined in 2020) European Plastics Converters (EuPC) INCPEN The Packaging Federation | | | | |
| 2. Strategy | | | | | | | |
| 102-14 | Statement from Senior Decision-Maker | <u>CEO's Message</u> | | | | | |
| 8. Ethics and Integrity | | | | | | | |
| 102-16 | Values, Principles Standards and Norms of Behavior | <u>Code of Business Ethics</u> Supplemental Code of Ethics | | | | | |
| I. Governance | | | | | | | |
| 102-18 | Governance Structure | Corporate Governance | | | | | |



General Disclosures

| Disclosure | Description | Response or Reference |
|------------------------|------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| . Stakeholder Engageme | nt | |
| 102-40 | List of Stakeholder Groups | Please refer to 102-46 |
| 102-41 | Collective Bargaining Agreements | Form 10-K 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 |
| . Reporting Practice | | |
| 102-45 | Entities Included in the Consolidated Financial Statements | This report covers all of our global operations for which Berry Global had operational control at the end of the reporting period, unless otherwise specified for specific indicators. |
| | | A sustainability assessment was performed in order to determine material aspects boundaries for all stakeholders in the long-term success of Berry Global. |
| | | Internal Stakeholders Employees: 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. |
| | | Berry Global: 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. |
| 102-46 | Defining Report Content and Topic Boundaries | External Stakeholders Customers: 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. Investors: 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 are 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. 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. Communities: The communities in which we operate are a critical stakeholder. Community engagement is encouraged at the corporate level and managed at the local level. Suppliers: 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. NGOs: 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. |
| 102-47 | List of Material Topics | Economic: Economic performance, ethical business practices Environmental: Litter and marine debris, energy, greenhouse gas emissions, waste, water, recyclability of Berry's packaging Social: Employee safety, regulatory compliance and product safety, employee training and education opportunities, reporting of ethics violations, and human rights |
| 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 packagin 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: <u>Robert Flores</u> Corporate Communications: <u>Eva Schmitz</u> Investor Relations: <u>Dustin Stilwell</u> |
| 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 | | | | | |
|---------------------|----------------------------------------------------|------------------------------------------|------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|
| Management Approach | | Corporate Governa | ance | | | | |
| | | Please refer to: For | <u>m 10-K</u> | | | | |
| | Direct Economic Value Generated and Distributed | | de them with value-added prote | ing to Protect What's Important,' and proudly partners with its ective solutions that are increasingly light-weighted and easier | | | |
| 201-1 | | broad range of inn packaging, diapers | ovative rigid, flexible, and non-w , various sanitizing and disinfect oducts, and packaging for many | nendous social value. Berry is a leading global supplier of a oven products. These include products for food and medical ing products, protective healthcare apparel, transportation/ other products that are essential to both consumer and | | | |
| | | | | penefits. We are working to better quantify our sales that have ry of sales in our HH&S division within Environmental or Social | | | |
| | | Pillar Social | Impact Area Disease Prevention Sanitation | FY19 Sales (\$MM) 306 1,515 | | | |
| | | Environmental | Green Building Pollution Prevention | 118 100 | | | |

205 Anti-Corruption

| Disclosure | Description | Response or Reference |
|---------------------|-----------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Management Approach | | It is the policy of Berry Global 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. |
| | | For more information, please visit: <u>Code of Business Ethics</u> <u>Supplemental Code of Ethics</u> |
| 205-2 | Communication and Training About Anti-Corruption Policies | The Code of Business Ethics (Code) is distributed to all employees, officers, and directors of Berry Global 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 Global or start their new position. From time to time, in order to re-emphasize our commitment to the Code, Berry Global may elect to redistribute the Code to all employees and have updated Acknowledgements signed. |
| | and Procedures | 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. |
| | | Furthermore, all employees are required to participate in annual compliance training covering a variety of subject matters, including the Berry Global Code of Business Ethics and global anti-corruption. |

301 Materials

| Disclosure | Description | Response or Reference |
|---------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | |
| | | |
| | | |
| | | 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. |
| | | Our sustainability strategy, Impact 2025, highlights efforts in many areas related to materials: |
| | | 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 |
| | | 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. |
| Management Approach | | 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. |
| | | 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. |
| | | 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. |
| | | For further information, please refer to: https://sustainability.berryglobal.com/products/ |



301 Materials

| Description | Response or Reference |
|---------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Materials Used by Weight or Volume | 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. |
| weight or volume | 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. |
| | For more information, please visit: <u>Form 10-K</u> p. 6 "Raw Materials" <u>Investor Presentation</u> |
| | 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. |
| Recycled Input Materials Used | 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. |
| | Materials Used by Weight or Volume |

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



301 Materials

| Disclosure | Description | Response or Reference | | | | | |
|------------|----------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------|--|--|--|--|
| | | 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 believ MacArthur Foundation New Plastics Economy Global Comm determining what percentage of our packaging is reusable, estimate the following: | hitment. We are still refining our methodology for | | | | |
| | | Reusable < 1% Recyclable 75% Compostable < 1% | | | | | |
| | | This is based on our fast-moving consumer goods packaginį for B2B applications. | g, excluding sales of reusable packaging we produce | | | | |
| | | 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% | | | | |
| 204.2 | Reclaimed Products | PP Cups | 61% | | | | |
| 301-3 | and Their Packaging Materials | PS Containers | 60% | | | | |
| | | PP and PE Lids | 54% | | | | |
| | | PS Lids | 45% | | | | |
| | | Plastic Buckets | 43% | | | | |
| | | PP and PS Cutlery | 5% | | | | |
| | | PE Tubes | 1% | | | | |
| | | PP and PS Cutlery | 5% | | | | |

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.



8

302 Energy

| Disclosure | Description | | | Response or F | Reference | | |
|---------------------|-----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| Nanagement Approach | | We strive to minimize or intensive; therefore, pla gas. Taking this into con As outlined in our susta Although we have near- | stics, our prima sideration, ene inability strateg term energy re | ary raw material, are rgy conservation ha gy, Impact 2025, our duction goals, we ha | e typically derived s become one of goal is to reduce ave a long-term v | d from energy sources our top priorities. e energy intensity by 1 | s such as natur % per year. |
| | | efficiency as part of our For further information <u>http://www.berryglo</u> | , please visit: | · | ellence. | | |
| | | | | | | 2019 | |
| 302-1 | Energy Consumption Within the Organization | | 2018 | Excluding RPC Aquistion | RPC Aquistion | 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 |
| | Energy Consumption | Other (GJ)* | 932,000 | 1,005,000 | 64,000 | 1,069,000 | 1,069,000 |
| | | | 16 206 000 | 16,368,000 | 7,363,000 | 23,731,000 | 23,731,000 |
| 302-2 | Outside of the Organization | Total Energy (GJ) 1 MWh = 3.6 GJ = 34.13 therr *Other energy sources are o are de minimis and therefo | | | atural gas. For facilit | ies that use natural gas, o | |
| 302-2 | Outside of the | 1 MWh = 3.6 GJ = 34.13 therr | n | ilities that do not use na | atural gas. For facilit | ies that use natural gas, o | ther energy source |
| 302-2 | Outside of the | 1 MWh = 3.6 GJ = 34.13 therr | nly tracked for fac re not tracked. | | atural gas. For facilit | ies that use natural gas, o | |
| 302-2 | Outside of the | 1 MWh = 3.6 GJ = 34.13 therr | n nly tracked for fac re not tracked. 2018 4.52 | ilities that do not use na | atural gas. For facilit Aquistion | ies that use natural gas, o 2019 RPC Acquisition 5.41 | ther energy source |
| 302-2 | Outside of the | 1 MWh = 3.6 GJ = 34.13 therr *Other energy sources are o are de minimis and therefor Electricity (GJ/MT) Natural Gas (GJ/MT) | n nly tracked for fac re not tracked. 2018 4.52 1.45 | Excluding RPC 4.40 | atural gas. For facilit Aquistion | ies that use natural gas, o 2019 RPC Acquisition 5.41 0.75 | ther energy source Total 4.71 1.19 |
| 302-2 302-3 | Outside of the | 1 MWh = 3.6 GJ = 34.13 therr *Other energy sources are o are de minimis and therefor Electricity (GJ/MT) Natural Gas (GJ/MT) Other (GJ/MT) | n nly tracked for fac re not tracked. 2018 4.52 1.45 0.36 | Excluding RPC 4.40 1.39 0.38 | atural gas. For facilit Aquistion | ies that use natural gas, o 2019 RPC Acquisition 5.41 0.75 0.05 | Total 4.71 1.19 0.28 |
| | Outside of the Organization | 1 MWh = 3.6 GJ = 34.13 therr *Other energy sources are o are de minimis and therefor Electricity (GJ/MT) Natural Gas (GJ/MT) | n nly tracked for fac re not tracked. 2018 4.52 1.45 | Excluding RPC 4.40 | atural gas. For facilit Aquistion | ies that use natural gas, o 2019 RPC Acquisition 5.41 0.75 | ther energy source Total 4.71 1.19 |
| | Outside of the Organization | 1 MWh = 3.6 GJ = 34.13 therr *Other energy sources are o are de minimis and therefor Electricity (GJ/MT) Natural Gas (GJ/MT) Other (GJ/MT) | n nly tracked for fac re not tracked. 2018 4.52 1.45 0.36 6.33 nly tracked for fac | Excluding RPC 4.40 1.39 0.38 6.16 | atural gas. For facilit | ies that use natural gas, o 2019 RPC Acquisition 5.41 0.75 0.05 6.21 | Total 4.71 1.19 0.28 6.18 |
| | Outside of the Organization | 1 MWh = 3.6 GJ = 34.13 therr *Other energy sources are of are de minimis and therefore Electricity (GJ/MT) Natural Gas (GJ/MT) Other (GJ/MT) Other (GJ/MT) Total Energy (GJ/MT) MT = Metric Tons *Other energy sources are of the energy so | 2018 4.52 1.45 0.36 6.33 nly tracked for fac re not tracked. | Excluding RPC 4.40 0.38 6.16 | Aquistion | ies that use natural gas, o 2019 RPC Acquisition 5.41 0.75 0.05 6.21 ies that use natural gas, o | Total 4.71 1.19 0.28 6.18 ther energy source |
| | Outside of the Organization | 1 MWh = 3.6 GJ = 34.13 therr *Other energy sources are of are de minimis and therefor Electricity (GJ/MT) Natural Gas (GJ/MT) Other (GJ/MT) Other (GJ/MT) Total Energy (GJ/MT) MT = Metric Tons *Other energy sources are of are de minimis and therefor Product lightweighting for | 2018 4.52 1.45 0.36 6.33 nly tracked for factor re not tracked. negatively affect for intensity. | Excluding RPC 4.40 1.39 0.38 6.16 illities that do not use na its our efforts to red ur absolute energy c | Aquistion Aquistion atural gas. For facilit uce intensity me onsumption was | ies that use natural gas, o 2019 RPC Acquisition 5.41 0.75 0.05 6.21 ies that use natural gas, o trics since volume pro- | Total 4.71 1.19 0.28 6.18 ther energy source pocessed is our |
| | Outside of the Organization | 1 MWh = 3.6 GJ = 34.13 therr *Other energy sources are of are de minimis and therefor *Other energy sources are of are de minimis and therefor Belectricity (GJ/MT) Natural Gas (GJ/MT) Other (GJ/MT) Other (GJ/MT) Total Energy (GJ/MT) MT = Metric Tons *Other energy sources are of are de minimis and therefor Product lightweighting referred denominator Please refer to 302-1 throur intensity decreased | 2018 2018 4.52 1.45 0.36 6.33 nly tracked for factor re not tracked. negatively affector for intensity. Tough 302-3. Ou 3%. That indicator y intensity are of ctices to help sing from simple | Excluding RPC 4.40 1.39 0.38 6.16 illities that do not use na its our efforts to red ur absolute energy c ates we were able to driven through our E ites reduce energy. | Aquistion Aquistion atural gas. For facilit uce intensity me onsumption was produce additio Berry Unplugged Our sites implem | ies that use natural gas, o 2019 RPC Acquisition 5.41 0.75 0.05 6.21 ies that use natural gas, o trics since volume pro- essentially flat, year nal volume without in program. Through th ient hundreds of ener | Total 4.71 1.19 0.28 6.18 ther energy source occessed is our over-year, but creasing energy is program, we gy reduction |



303 Water

| Disclosure | Description | Response or Reference | | | | | | |
|---------------------|-------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------|--------------------------------------------------------------------------------------|----------------------------------------------------------|-----------------------------------|--|--|
| | | We strive to minimize our environmental footprint and conserve natural resources. As freshwater is become more scarce, we aim to use this critical natural resource in a more sustainable way. | | | | | | |
| Management Approach | | 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 2 we have a near-term w efforts to achieve Oper | ater reduction g | ity strategy, our goal is to reduce v oal, we have a vision to be "Best i ice. | vater intensity by 1% per n Class" in water efficiend | year. Althoug cy as part of ou | | |
| | | For further information http://www.berrygle | | nability-policy | | | | |
| | | | 2040 | | 2019 | | | |
| | | | 2018 | Excluding RPC Aquistion | RPC Acquisition | Total | | |
| | | Water (m ³) | 4,747,000 | 4,316,000 | 696,000 | 5,012,000 | | |
| | | Water Intensity (m³/MT) | 1.85 | 1.63 | 0.59 | 1.30 | | |
| | | MT=Metric Tons | | 20/ | - 40/ | | | |
| | Water Withdrawal by Source | In 2019, we reduced ab withdrawals by 9% and | | by 12%. Ground Water | <pre>< 1% Surface</pre> | | | |
| 303-1 | | Most of our sites prima cooling. Some of our si other processes, such a of nonwoven fibers. Sit processes beyond cool most water intensive. | tes also use wat as hydroentangl tes that use wate | or er for ement er for 'our | WATER | | | |
| | | Improvements in water through our Berry Unp Through this program, and educate sites on w efficiency, thereby redu | lugged program we share best p ays to improve | riven n. bractices water | SOURCE | 94% Municipal | | |
| 303-2 | Water Sources Significantly Affected by Withdrawal of Water | Based on the criteria p withdrawal of water. | rovided by GRI, | we do not believe we are significa | ntly affecting any water s | sources by the | | |
| | | - | - | - | | | | |
| 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 | | | | | | |



305 Emissions

| Disclosure | Description | Response or Reference | | |
|----------------------|-------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| | | | | |
| | | 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). | | |
| | | Several other targets from our Impact 2025 sustainability strategy also aim to reduce GHG emissions: | | |
| | | Products 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 | | |
| | | Performance Reduce greenhouse gas emissions intensity 25% by 2025 versus our 2016 baseline Reduce energy intensity 1% per year | | |
| | | Partners Increase renewable energy Expand the use of plastic in place of alternative materials Promote science-based targets | | |
| /Janagement Approach | | 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. | | |
| | | 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. | | |
| | | 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. | | |
| | | 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. | | |
| | | For further information, please visit: http://www.berryglobal.com/sustainability-policy https://www.cdp.net/ https://sciencebasedtargets.org/ | | |



305 Emissions

| Disclosure | Description | Response or Reference | | | | | | |
|------------|-----------------------------------------------|----------------------------------------------------------------|-----------|------------------------------------------------|------------------------|---------|--|--|
| | | 2018 | | 2019 | | | | |
| | | | 2010 | Excluding RPC Aquistion | RPC Acquisition | Tota | | |
| | | Scope 1 GHG Emissions (MT CO2e) | 237,000 | 240,000 | 69,000 | 309,0 | | |
| | | Scope 2 GHG Emissions (MT CO2e) | 1,440,000 | 1,449,000 | 682,000 | 2,131,0 | | |
| | | Scope 1+2 GHG Emissions Intensity (MT CO2e/MT Processed) | 1,678,000 | 1,670,000 | 751,000 | 2,441,0 | | |
| | | Total GHG emissions intensity (MT CO2e/MT) | 0.65 | 0.64 | 0.63 | 0.64 | | |
| | | MT = metric tons $CO_2e = CO_2 equivalents$ | | | | | | |
| 305-1 | Direct (Scope 1) GHG Emissions | SCO | PE 1 +2 G | HG EMISSIONS INTEN | ISITY TREND | | | |
| | | | <u> </u> | Metric Tons of CO ₂ e per Metric To | n Processed | | | |
| 305-2 | Energy Indirect (Scope 2) GHG Emissions | 1.2 | | | | | | |
| | | 0.8 | | | | | | |
| | | | | | | | | |
| | | 0.4 | | | | | | |
| | | 0.2 | | | | | | |

adjusted for acquisitions, but instead, is reflective of our business as it existed during the year indicated.



305 Emissions

| Disclosure | Description | Response or Reference |
|----------------------------------|------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 305-3 | Other Indirect | Total Scope 3 GHG Emissions = 10.5 million metric tons CO2e |
| | (Scope 3) GHG Emissions | As discussed in the Management Approach for this 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. 5% |
| 81% SCOPE 3 — TOTAL | 2019 GHG EMISSIONS BREAKDOWN | 2% SCOPE 1 TOTAL PURCHASED GOODS & SERVICES 17% SCOPE 2 TOTAL 17% SCOPE 2 SCOPE 2 TOTAL 17% SCOPE 2 SCOPE 2 TOTAL 17% SCOPE 2 SCOPE |
| | | Please refer to 305-1 and 305-2. |
| | GHG Emissions | 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. |
| 305-4 | Intensity | Product lightweighting negatively affects our efforts to reduce intensity metrics because 1) our volume process is our preferred denominator for intensity normalization, and 2) lighter parts are more energy intensive to produce across most of our conversion processes. |
| | | 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 emis- sions intensity for the same period was down 2.5%, excluding RPC, indicating we were able to increase produc- tion 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). |
| 305-5 | Reduction of GHG Emissions | Electricity is our largest source (87%) of Scope 1+2 GHG emissions. To reduce GHG emissions from an operation 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 cover 40,000 barrels of oil - however, we do not own the renewable energy certificates for these projects. Despit 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 encoura 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 |
|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | 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 Global, 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 contro 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. |
| Management Approach | 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 Econom 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 |
| | Linear Economy Circular Economy |
| | MAKE THE |
| | TAKE MAKE DISPOSE |



14

306 Effluents and Waste

306-2



| | 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.





308 Supplier Environmental Assessment

| Disclosure | Description | Response or Reference | | |
|---------------------|---------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| | | 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. | | |
| Management Approach | | 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. | | |
| | | For further information, please refer to: 102-9 <u>Supplier Code of Conduct</u> <u>Purchase Order Standard Terms and Conditions</u> | | |
| | New Suppliers That Were Screened Using Environmental Criteria | 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. | | |
| | Environmental Criteria | We also specify supplier expectations in our Purchase Order Standard Terms and Conditions. | | |

403 Occupational Health and Safety

| Disclosure | Description | Response or Reference | | | | | | |
|---------------------|------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|------|---------------|----------------|--------|------------|
| Management Approach | | The safety of our employees and contractors is the fact that we continually transform our safe incident rate to be far below the industry avera | ety practices a | | | | | |
| | | 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 offer also offer mandatory online courses through Berry University. | | | | | | /isits. To |
| | | At Berry Global, 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 Global employees to maintain a safe workplace and support the sustainability efforts. | | | | | | |
| | | For further information, please refer to: Environmental, Health and Safety Vision & f | Policy | | | | | |
| | | | OSHA | | RDABL | | ENT RA | TE |
| | | We track our total recordable incident rate as our key performance indicator for this disclosure. Our recordable | | -• | – Berry – 🗕 I | ndustry Averaş | ge | |
| | Types of Injury | incident rate is calculated using U.S. OSHA's classification criteria. | 4.60 | 4.20 | | | | |
| | and Rates of Injury, Occupational Diseases, | Industry average is based on the | | | 3.90 | 3.90 | 3.80 | 3.80* |
| 403-2 | Lost Days, and Absenteeism, and | incident rate of nonfatal occupational injuries and illnesses for Plastics | 1.26 | 1.27 | 1.40 | 1.22 | 1.20 | 1.09 |
| | Number of Work-Related Fatalities | Product Manufacturing (NAICS 3261) as published by the United States Department of Labor's Bureau of Labor Statistics: <u>https://www.bls.gov/iif/oshsum.htm</u> -20 | 2014 | 2015 | 2016 | 2017 | 2018 | 2019 |

404 Training and Education

| Disclosure | Description | Response or Reference | | | |
|---------------------|------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|
| Management Approach | | 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. | | | |
| | | 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. | | | |
| | | 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) | | | |
| | | 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) | | | |
| | | 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) | | | |
| | | 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) | | | |
| | Programs for Upgrading Employee Skills and Transition Assistance Programs | 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) | | | |
| | | 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)) | | | |
| 404-2 | | 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) | | | |
| | | 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) | | | |
| | | 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) | | | |
| | | Finance for Sales Professionals: simulation-based course for sales professionals used as a deep dive into P&L levers which can be used when negotiating with customers. 3rd party deliver in US, EU and South America. (75 participants 2019) | | | |
| | | 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) | | | |
| | | 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) | | | |
| | | 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) | | | |
| | | 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. | | | |
| | | 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." | | | |
| | | For further information, please visit: http://www.berryglobal.com/careers | | | |



414 Supplier Social Assessment

| Disclosure | Description | Response or Reference |
|---------------------|--------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | 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. |
| Management Approach | | 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. |
| | | For further information, please refer to: 102-9 <u>Supplier Code of Conduct</u> <u>Global Acquisition and Accountability Policy</u> <u>Modern Slavery Act Statement</u> <u>Purchase Order Standard Terms and Conditions</u> |
| 414-1 | New suppliers That Were Screened Using Social Criteria | 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. We also specify supplier expectations in our Purchase Order Standard Terms and Conditions. |

416 Customer Health and Safety

| Disclosure | Description | Response or Reference | | |
|---------------------|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| | | Berry Global 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. | | |
| Management Approach | | For further information, please refer to: <u>Product Stewardship Policy</u> <u>Continuous Improvement</u> <u>Quality Policy</u> | | |



416 Customer Health and Safety

| Disclosure | Description | Response or Reference |
|------------|----------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | Chemical Safety 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. 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. |
| | | Monitoring Regulation |
| | | 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. |
| | | 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. |
| | | Berry Finished Goods |
| | | 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. |
| 416-1 | Assessment of the Health and Safety Impacts of Product and Service Categories | 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. |
| | | Product Testing |
| | | Berry conducts testing, as needed, to verify product safety and demonstrate regulatory compliance. Examples include: |
| | | Biocompatibility testing for nonwoven products used in healthcare and hygiene applications Food and drug contact compliance, on multiple continents Consumer Product Safety Commission (CPSC) testing for child resistant closures |
| | | Product Registration/Certification Berry holds numerous product registrations/certifications across our many product lines and broad geographical footprint. |
| | | Management of Change |
| | | 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. |
| | | Policies |
| | | Berry established internal product policies including: Implant and Fluid – Tissue Contact Application California Proposition 65 Pesticide (ingredients and products) Product Stewardship |
| | | Additionally, the following documents are available externally: <u>CTSCA – Global Acquisition and Accountability Policy</u> <u>Modern Slavery Act Transparency Statement</u> <u>Code of Business Ethics</u> <u>Supplier Code of Conduct</u> <u>Terms and Conditions</u> |







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