



2021

Global Code of Business Ethics

Always advancing to protect what's important



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A Message from Our CEO

Our Global Code of Business Ethics (the "Code") is essential to providing and explaining the expectations of our behaviors and how we conduct our business. By joining as OneBerry, our Company has earned recognition as a global leader in our industry. As such, we must each take seriously our individual and collective role in not merely maintaining this leading position, but in further strengthening it. In so doing, we will never compromise our values, brand, or reputation to win business.

At the foundation are our values of Partnership, Excellence, Growth, and Safety. These values unite us, inspire innovation, and are key in fostering long-term business relations. You will notice other values throughout the Code, such as transparency, honesty, truthfulness, and integrity. These are more than just words, but a way of doing business.

We all have an obligation to familiarize ourselves with the Code. We should hold ourselves accountable to understand the principles upon which the Code is based and to meet the expectations of behavior that it promotes. The Code is practical in that it offers guidance, examples, and issue-spotting exercises. It is not meant to be exhaustive, but provides direction in situations when the course of action may be unclear.

Know that if at any time you are not sure what to do, feel free to ask your manager or anyone in senior leadership. You can also reach out to your local Human Resources representative, any member of the Ethics Committee, Ethics & Compliance, and Legal. Finally, you can always contact our 24/7 Ethics Helpline, which is administered by an independent third-party provider. You have the option to remain anonymous, where permitted by local law, but be assured that we have a zero-tolerance anti-retaliation policy for speaking up when you have a reason to believe misconduct has occurred.

Thank you for doing the right thing, each and every day, and for protecting our market-leading brand and reputation.



Thomas E. Salmon
 Chairman & CEO
 Berry Global Group, Inc.

Our Mission, Values, Behaviors, & Program



Our Mission

Always advancing to protect what's important.

Our Values & Behaviors

The following Values of Partnership, Excellence, Growth, and Safety help guide our Behaviors of remaining United, Focused, Agile, and Accountable.



Partnerships

We recognize the importance of strong, sustainable partnerships throughout all aspects of our business – we view our employees, customers, suppliers, and communities as our partners.



Excellence

We pursue excellence in all that we do by optimizing our processes, enhancing our sustainability initiatives, and by providing the highest quality products and services to our customers. We believe in continuous training and development for our employees so that we can deliver excellence to our customers.



Growth

Strategic growth is imperative for our business. Growth comes in many forms – financial growth, customer growth, employee growth and development, product growth and innovation, and the global growth of Berry.



Safety

This is our number one value. We relentlessly pursue safety in all we do. We maintain high standards to ensure our facilities are safe and environmentally conscious.

Our Global Ethics & Compliance Program

The Global Ethics & Compliance Program supports Our Mission by always advancing to protect our people, assets, business partners, brand, and reputation by promoting an ethical culture, providing tools to do the right thing, creating a positive and safe work environment, and ensuring adherence to all local laws and regulations.

Our Compass

Why do we have a Code?

Our Code is the foundation of our ethical culture and sets clear expectations for ourselves and our business partners around the globe. However, it will not address every situation we may encounter or every law we must follow. It is meant to serve as a guide to help us make the right decisions, and in those situations where the course of action remains unclear, it provides additional resources to gain clarity.

Making Ethical Choices

We must act with integrity, which means doing the right thing even when no one is watching. While the expectation to do the right thing is unquestionable, it may not always be easy to determine the right course of action. We do our best to educate and communicate on ethical issues, but we also recognize the challenges of working in a global, complex organization. In those difficult situations, we recommend asking yourself the following questions:

- 1  Is it legal?
- 2  Does it follow Berry's Code and policies?
- 3  Is it consistent with Berry's values and behaviors?
- 4  Will my decision maintain Berry's strong reputation?
- 5  Would I be proud if my action was shared publicly?

If you answered "yes" to all five questions, then you are probably fine to proceed. If you answered "no" or "unsure" to any of these questions, then seek guidance from your Manager or anyone in Human Resources, Ethics & Compliance or Legal.



Responsibilities of Berry Team Members

- We are all responsible for
- Acting with integrity and consistently with our values and behaviors
 - Understanding and following the expectations in our Code
 - Seeking guidance when the right action is unclear
 - Speaking up when something doesn't seem right

Responsibilities of Berry Leaders

- Our leaders have additional responsibilities to
- Set a strong ethical tone at the top
 - Create an open door environment and listen respectfully while taking all concerns seriously
 - Recognize those who do the right thing
 - Escalate concerns
 - Prevent retaliation against those who raise an issue



FOCUS UP

I have a suspicion that a fellow team member violated a company policy, but I did not directly witness it. I do not want to accuse someone of something they did not do. Should I say something?



We may not know for certain whether someone violated a Berry policy. If you have a reason to believe a violation has occurred, we encourage you to **Speak Up**. Feel free to talk with your Manager, Human Resources, Ethics & Compliance, Legal, or use the Ethics Helpline. They will maintain confidentiality to the greatest extent possible while assessing the situation to determine whether further action is required.

Speaking Up & Seeking Guidance

We must hold ourselves accountable to **Speak Up** when something doesn't seem right or to ask questions when the ethical course of action is not clear. There are many avenues to ask for guidance or to raise a Code violation concern.

1. Most issues can be addressed by your immediate Manager. When in doubt, always feel comfortable speaking to your direct or next-level Manager about any concern.
2. If you don't feel comfortable speaking to your Manager or do not believe your concern was addressed, you can always raise the concern with Human Resources, Ethics & Compliance, or Legal.
3. We also have an Ethics Committee, which includes representation from each of our Divisions, key functional areas, and regions around the globe. Feel free to reach out to any member of the Committee and, if necessary, they will escalate your concern.
4. You always have the option to raise an issue or seek guidance through our 24/7 Ethics Helpline by calling a toll free number or submitting a claim via the website. All country-specific phone numbers can be found on the Ethics Helpline website. It is managed by a third party provider. You have the option to remain anonymous (where local law permits), but we encourage you to share your name since it can be very difficult to conduct a thorough investigation without a reporter's name.



No Retaliation

We appreciate team members around the globe who do the right thing and **Speak Up** when they have reason to believe misconduct has occurred and who cooperate with an investigation when asked to discuss a concern. One way Berry strives to maintain an open environment for people to **Speak Up** and seek guidance is through our commitment to not retaliate. Retaliation is an action taken to negatively impact a team member's current work environment as a consequence of speaking up or cooperating in an investigation.

Berry prohibits all forms of retaliation against anyone who speaks up in good faith. Retaliation has no place at Berry as it harms the reporter and our culture of integrity, creates a toxic environment and erodes trust in the investigative process. This is why it is so important for leaders to hold themselves accountable to create an open and inviting environment to raise concerns. If you feel that you have been retaliated against, contact Ethics & Compliance or your local Human Resources representative immediately.

Ethics Helpline

We are all responsible to **Speak Up** when something does not seem right. Talk to your Manager or Human Resources, or contact the Ethics Helpline, to ask questions or report concerns of misconduct, violations of the law or regulations, or unethical behavior, such as:

- Safety or environmental concerns
- Substance abuse
- Harassment or discrimination
- Theft or fraud
- Threats or violence



berryglobal.ethicspoint.com



Our Work Environment

Health & Safety

Safety is not just our highest priority, it is also a core value. While we track and monitor many metrics and collect thousands of safety data points per month, we believe that safety is not about numbers, but ultimately about keeping ourselves and our team members safe. We can accept nothing but excellence with regard to health and safety. Excellence can only be achieved by including and empowering each and every team member to have a voice in our safety program.

Berry has high expectations for all our team members, including the following:

- Recognize and help mitigate risk in their work environment
- Stop-work authority when an unnecessary risk is perceived
- Report all incidents, near-misses and opportunities for risk reduction

At Berry, we believe that there is no task, no order to ship or production to run that is worth jeopardizing the safety of our team members.



Product Quality and Safety

Berry maintains the highest possible standards of product stewardship. We are focused on providing safe, high-quality products, services and solutions that meet our customers' expectations. Our Quality Management System, guided by ISO standards, ensures a strong quality culture. We are truthful in our quality checks and honest about addressing issues we find throughout the process. We hold ourselves accountable to not simply pass on the problem, but **Speak Up** and address it as soon as possible. This means we strive to communicate accurate regulatory information about our products for our customers. Berry also partners closely with its supply chain to engage in responsible sourcing that focuses on innovation and sustainability without compromising quality.

Continuous Improvement

Continuous improvement is at the heart of everything we do. It signifies growth – whether personally or professionally. We strive to advance the effectiveness of our systems through the utilization of technology, teamwork, and skilled team members. Everyone is encouraged to think about how we can improve our work station, sharpen our current skills, and develop new ones. If reoccurring issues continue to rise, then it is important to be focused yet remain agile; deep dive the issue, and uncover the root cause. It is the responsibility of leaders to recognize team members who bring forth continuous improvement ideas.

Environmental Compliance

Berry understands manufacturing processes have an impact on the environment. We are committed to not only following all environmental laws and regulations, but holding ourselves accountable to do all we can to protect the environment. This includes:

- Partnering with suppliers to maintain the highest quality products while reducing material usage
- Decreasing greenhouse gas emissions by improving energy efficiency
- Minimizing our waste generation
- Assuring waste is properly disposed through safe and responsible methods
- Not exposing team members and other stakeholders to hazardous or toxic substances

Guided by Science-Based Targets (SBTs), we are all responsible for adopting a continuous improvement mindset to minimize our environmental impact on the planet. Whether it be reducing greenhouse gas emissions, minimizing our waste generation, or participating in industry-wide initiatives like **Operation Clean Sweep**®, we will always do our part, and more, to protect the planet.



FOCUS UP

We are running behind schedule and I'm checking the quality of a large order. Unfortunately, it does not meet our quality standards. However, by failing the inspection, we run the risk of not meeting our financial targets. Should I look the other way this one time?



We must hold ourselves accountable to be transparent. This means we have an obligation to **Speak Up** about the quality issue. This will ensure our customer continues to receive the highest quality product and offer us an opportunity to improve the process, and avoid the situation from arising in the future.

Our Team Members



Trade Compliance

Everyone at Berry is expected to comply with applicable laws and regulations governing international trade and other international transactions, including:

- Importation
- Exportation
- Re-exportation
- Disclosures of technical data to foreign persons
- Participation in boycotts
- Employment of foreign nationals
- Payments to government officials
- Sales of goods to governmental entities

It may not be enough to simply follow the law. Our International Trade Compliance Policies and Procedures may have additional requirements that go above and beyond applicable laws and regulations. These policies are intended to identify and address trade compliance risks across the organization. Any Berry team member who violates these policies will be subject to disciplinary action, up to and including termination.

It is the responsibility of the International Trade Compliance Group to communicate these policies to the appropriate people within Berry and to train them on specific responsibilities related to these policies.

If you have any questions related trade compliance, be sure to seek guidance from the International Trade Compliance Group.

Global Business Operations



We have grown quickly through our history of acquisitions. It is exciting, welcoming new companies and team members into the Berry family. Our growth has given us the opportunity to participate in new markets around the globe. While every region has their own way of conducting business, it is essential that we follow all applicable local laws and regulations and not compromise our values during any business dealings. Each and every one of us must hold ourselves accountable to this expectation.

FOCUS UP

I see language on a contract that appears to be anti-boycott in nature. I'm thinking about reaching out for further clarification, but don't want to forward it to the wrong person. What should I do?



You should contact the International Trade Compliance Group immediately. They will address your concern and help determine the best course of action.



Respect in the Workplace

We are committed to creating a safe working environment. This means we must treat one another with dignity and respect. Discrimination or harassment based on the following characteristics is absolutely prohibited:

- Race
- Color
- Gender
- Gender identity
- Sexual orientation
- Pregnancy
- Religion
- Creed
- National origin
- Veteran status
- Disability
- Age

If you have reason to believe such conduct has occurred, you have an obligation to **Speak Up**. We have a streamlined process to investigate all claims of harassment with the thoroughness and urgency they require.



FOCUS UP

I attended a meeting recently where we were talking about products that women primarily use. I was the only woman in the meeting and asked to give my perspective since I had “first-hand knowledge”. I don’t believe the person making the comment had malicious intent, but it made me very uncomfortable. What should I do?



Regardless of intent, you have the opportunity to **Speak Up** and share your concern. You can always talk with your Manager or Human Resources about the situation. They will support you and address the issue with the person who made the comment.

Diversity, Equity, & Inclusion

We value the fact that everyone holds their own identity, but joins together to become one community. This is what makes us unique and unites us. Together, we are building and shaping our culture each day to ensure everyone feels welcome and connected. Through our diversity and inclusion network, plugIN, our team members are provided resources to achieve a positive work experience. We become OneBerry through plugIN’s strategic objectives of recruitment and development, a positive team member experience, customer and supplier engagement, community partnerships, and business growth.

Our diversity and inclusion mission aims to ensure that each team member feels valued, included, and an integral part of our organization’s success. In doing so, that positions us to leverage the skills, attributes, and talents of each individual. Ultimately, this will result in a culture for all backgrounds, cultures, and experiences.





Conflict of Interest

We must make decisions that are in the best interest of Berry. A conflict of interest arises when our personal interests challenge our ability to make the best decision on behalf of the company. Because we value integrity, honesty, and transparency, even the appearance of a conflict needs to be appropriately reported to avoid any perception of favoritism.

Conflict of interest examples include:

- Personal Relationships – Being on the selection committee where one of the potential suppliers is a close friend or relative.
- Financial Interests – Having a more than nominal financial interest in a supplier, customer, or competitor of Berry.
- Business Opportunities – Obtaining a personal benefit from a business dealing you discovered based on, or related to, your work at Berry.
- Use of Berry Assets for Personal Gain – Starting a business using Berry assets, such as time and materials.
- Gifts, Travel and Entertainment – Giving and receiving business gifts that may influence a business decision or give the appearance of one.

Typically, conflicts can be easily resolved. It is important to be accountable and disclose any actual, perceived, or potential conflict to your Manager or Ethics & Compliance immediately. They will work together to address the concern as quickly as possible.

FOCUS UP

I have a friend who would make a great supplier to Berry. Should I not recommend their company to avoid creating a conflict of interest?



You can always recommend a friend or family member as a supplier. We want to have the strongest business partners in our value chain. However, you cannot be part of the selection process as your friendship may prevent you from making an unbiased decision, or, at minimum, your relationship gives the appearance of not being impartial.



Berry Global

Communicate Responsibly

Berry uses social media as a platform to share our latest innovations, partnerships, and sustainability achievements. We are especially proud to see our team members around the globe re-sharing our messages with their friends, family, and colleagues. This builds upon our strong brand and reputation. It is important to remember that only select team members are designated to speak on behalf of the company, whether to investors, media inquiries, or the local community. This team will ensure we speak as a OneBerry voice.

We must take responsibility for our posts on social media in the following ways:

- We should never share material nonpublic information, whether it be about our company, suppliers or customers.
- Any comments should be identified as your own and not that of the company.
- Harassing and discriminatory language will not be tolerated.

Like

Comment

Share





Our Business Partners

Supplier Responsibility

There is only one way to conduct business, that is, the right way. This expectation is made clear to all Berry team members. Likewise, we hold our suppliers to the same ethical standard. We expect our suppliers to

- Follow all local laws and regulations, and where our Code is more restrictive, to follow our principles of doing business
- Respect global human rights and fair labor standards outlined in our Global Human Rights Policy
- Compete in the market fairly, transparently, and honestly
- Adhere to all environmental laws and regulations
- Provide its employees with a safe and healthy working environment
- Disclose any potential conflicts of interest relating to their business with Berry
- Demonstrate a commitment to supplier diversity
- Respond to our requests in a timely manner, including, but not limited to, audits, Supplier Code of Conduct certifications, and conflict minerals reporting

If you are a supplier and a decision is unclear, review Berry's Supplier Code of Conduct or always feel comfortable reaching out to your Berry contact. You can also utilize the Berry Ethics Helpline to request guidance or report any concerns of misconduct.



Fair Competition

Berry believes competition drives innovation and benefits consumers. We conduct business fairly and honestly and follow all competition laws. This means we will not have discussions or enter agreements with our competitors around

- Prices
- Allocating markets and territories
- Bid rigging

We should also avoid harsh language against our competitors' products and services.

It is acceptable to gather competitive intelligence, but only in an ethical manner. It is always best to use public sources of information (e.g., proxy statements, investor calls, and company websites). Seeking nonpublic information from a competitor is dishonest, lacks transparency, and is prohibited.

What if a competitor at a trade show starts discussing sensitive information?

1. Stop the conversation
2. Make it clear that you are not interested in participating in the discussion
3. Leave the situation
4. Contact your Manager, Ethics & Compliance, or Legal immediately

FOCUS UP

I am trying to better understand the competitive landscape. I have an opportunity to access documents with sensitive information, which has not been made public, from a trusted source. What should I do?



We will never accept documents with competitively sensitive information. We only seek information that is publicly available and use that information to inform our decisions. If you are given competitively sensitive information, be sure to contact Legal immediately.





Preventing Bribery & Corruption

We win in the market based on the merits of our products and partnerships built on trust. No business dealing is so lucrative that we would compromise our integrity. Some anti-corruption laws distinguish bribing a government official, and non-government official, but we do not. All forms of bribery and corruption are absolutely prohibited. Bribery includes offering, promising, or giving anything of value directly or through a third party, to improperly influence the decision-maker for the purpose of obtaining or retaining business or gaining a business advantage.

Even the smallest of bribes, often referred to as “facilitation payments,” are not acceptable. Facilitation, or grease, payments are small bribes to a government official used to secure or expedite a routine governmental service. Examples of facilitation payments include:

- Processing licenses, visas, and general paperwork
- Securing permits
- Turning on utilities
- Receiving customs clearance
- Delivery of mail

Third Parties

Third parties are an essential part of our business. They are crucial to meet customer demands and fight corruption and unethical behavior. Third parties often represent our company, but they cannot be a means to conceal illicit payments. Just as we cannot make an improper payment to a government official, we cannot use a third party to make that payment on our behalf. This is illegal and will negatively impact our brand and reputation. We can be held responsible for the actions of the third parties that represent us.

We must remain focused on identifying third party red flags. Red flags do not necessarily prevent us from doing business with a third party, but they represent risks that we must document and mitigate. Third party red flags include:

- Performing services in countries where bribery is a common way of doing business or has a history of corruption
- Exposure to government officials
- Being reluctant to share information (e.g., organizational structure)
- Requests for payments to be made to a foreign bank account
- An unwillingness to sign a contract with anti-bribery and anti-corruption language
- Consulting agreements described in vague terms
- Lack of experience in the services or industry for which they are being engaged
- Shell companies incorporated in offshore jurisdictions
- Unreasonably large discounts
- Excessive commissions
- A prior allegation of corrupt or illegal behavior
- Lack of documentation of work being performed
- Failing to provide detailed travel and expense documentation

If you come across these red flags, be sure to **Speak Up** and contact Ethics & Compliance or Legal.

FOCUS UP

I am frustrated with how long it is taking to secure a building permit. No one is returning my call. I visited the local office and they explained this could “easily go away” for a small fee. The amount is nominal; should I pay it?



This is considered a bribe. We cannot offer anything of value, regardless of the amount, in exchange to secure the permit. Inform them that you are not willing to make the payment and contact Ethics & Compliance or Legal immediately.



Gifts & Entertainment

Berry recognizes that trust is not built overnight. We understand that partnerships strengthen through events and dinners. A gift of nominal value (less than \$75 USD annually) is generally acceptable. It is never acceptable, no matter the value, to give or receive gifts that influence, or have the appearance of influencing, a business decision. Gifts that are never acceptable include:

- Cash or cash equivalents (e.g., gift cards, coupons, or gift certificates)
- Gifts that can be sold for cash (e.g., jewelry)
- An expensive gift (even if it is a promotional item)
- Employment promises
- Gift giving or receiving that is inconsistent with the supplier or customer's internal policy

Gifts and entertainment that are either frequent or expensive can certainly create an actual or apparent conflict of interest. We must hold ourselves accountable to avoid even the appearance of a conflict and demonstrate the courage to say "No" when something doesn't seem right. This may be difficult when you do not want to offend someone, especially with different cultural norms. If you have any questions, you can always ask your Manager, Ethics & Compliance, or Legal.

FOCUS UP

I have been offered a lavish gift, but I do not want to reject it for fear of appearing ungrateful or offensive. Can I accept it?



Maybe. First, explain Berry's policy that states you can only accept gifts of nominal value (under \$75 USD annually). If this does not work, then accept it, and disclose it to your Manager and Ethics & Compliance as soon as possible. The Ethics Committee will then make a decision about how to best address the gift.



Anti-Money Laundering

Berry prohibits money laundering as it is illegal. Money laundering involves a person or entity taking action to cause proceeds from criminal behavior, such as terrorist activity, drug dealing, and human trafficking, to appear as having been generated from legitimate sources. This activity may be difficult to detect, but it's vital for us to have a heightened awareness around the following red flags:

- Customer provides insufficient information (e.g., beneficial ownership or details around the nature of the business)
- Customer requests for unexplained large purchases
- Customer is unwilling to comply with accurate recordkeeping
- Payments requests to/from several bank accounts that are not party to the transaction

If you have any suspicion of money laundering activity, contact Legal immediately.

Government Relations

Berry takes seriously its responsibility to engage in fair and honest dealings, directly and indirectly, with governments around the world. We understand the heightened risk of working with government officials and regulators. We will not bribe or offer "anything of value" in order to influence a government official. By "anything of value," we mean any form of benefit, including, but not limited to cash or cash equivalents, gifts, services, employment offers, loans, travel expenses, entertainment, political contributions, charitable donations, excessive discounts, per diem payments, sponsorships, honoraria, or the like.

Who is a government official?

- Officer or employee of a government or a person acting on their behalf (e.g., members of parliament, customs inspectors, military personnel, and police officers)
- Political candidate, party official or representative acting on behalf of a candidate or party
- Employees of a state-owned or controlled entity (e.g., public utilities such as water, gas, and electric) and state-owned hospitals, universities, and media
- Employees or representatives of a public international organization (e.g., International Red Cross, World Bank, or United Nations)
- Close relative to any of the above

Our Information

Accurate Books, Records, and Reports

Financial integrity should never be compromised. This starts with accurately representing our books and records honestly and truthfully. We must record transactions that occurred within their respective financial period. No revenue or expense should be brought forward or pushed back for the sake of hitting financial targets. There is no transaction that needs to be recorded as “off-the-books” and if such a situation arises, **Speak Up** and inform your Manager, Ethics & Compliance, or Internal Audit.

We are all financial stewards of the company. We must be honest in all recordkeeping activities, including our timesheets, quality checklists, expense reports, and invoices. We need these documents completed fully and accurately, no matter how urgent the next matter.

We are also responsible for maintaining business records according to our records retention policy. We do this by

- Following retention periods that correspond to specific documents and records
- Accurately identifying and saving all records under a “Legal Hold”
- Destroying all documents not necessary for legal and business reasons



FOCUS UP

As the end of the quarter is approaching, I realize that we have exceeded our travel budget. Is it okay to delay submitting my expense report to ensure staying within budget?



No, we must accurately record and report our expenses. This may be a difficult conversation, but it is much easier than the alternative of explaining why you did not report expenses in a timely and accurate manner.

Data Protection & Privacy

We are entrusted to protect personal information with the highest standard of excellence. Many of us handle personal information from suppliers, team members, and customers. We only collect the information we need, store that information with care, share only when legally permitted on a need-to-know basis, and properly dispose of those records when they no longer serve a business or legal purpose. Data privacy laws and regulations vary by regions around the globe, so be sure to seek guidance from Legal or IMS if you have any questions.

Personal data is any information that is used to identify an individual. Some examples include:

- Name
- Contact information
- Email address
- Social media name
- IP address
- Health information
- Government ID information
- Financial data

Confidential and Proprietary Information

Berry recognizes that confidential information must be handled with the utmost care. We must take responsibility to ensure we properly identify all necessary records as CONFIDENTIAL. If a third party requires access to confidential information, they must first sign a non-disclosure agreement.

We need to all hold ourselves accountable to not discuss confidential information in a public setting, which includes our Berry colleagues. Do not assume that simply because someone works with you that they have access or need to have access to confidential information. This is why we need to be focused about what we are saying in public Berry spaces, including the cafeteria, conference rooms, parking lot, and the hallway. It is better to be overly-cautious. If you need to seek guidance about sharing confidential information or believe someone wrongly possesses such information, be sure to contact your Manager or Legal.

Examples of confidential information include:

- Production schedule
- Pricing data
- Marketing strategy
- Research & development roadmap
- Nonpublic financial information
- Business partner data



FOCUS UP

I was wrongly sent information that was not marked as CONFIDENTIAL, but contained sensitive information. What should I do?



Even though the document is not labeled as CONFIDENTIAL, be sure to delete it immediately. You should then inform the sender that you wrongly received the document, and contact Legal.

We must protect confidential information in order to remain a market leader. It is not found in the public, which makes it all the more valuable to us. It sets us apart from the competition and provides a competitive advantage. This is all the more reason we need to ensure such confidential information is guarded closely and shared with only those who need to know.

This includes safeguarding our intellectual property – patents, trade secrets, copyright, and trademarks – and respecting others' intellectual property by gaining proper approval before using, if appropriate. Berry is proud of the innovations from team members around the globe, but it is important to remember that all developments and designs created during your employment with Berry belong to the company.

Cybersecurity

Berry provides physical and electronic assets (such as computers, hardware and software) to do our jobs. It is our responsibility to protect them as if they are our own. We need to be extra vigilant as the number of cyber-attacks continue to rise. Simply clicking the wrong link could compromise company sensitive information, harm our reputation, and lessen our competitive advantage.

Practicing good cybersecurity includes

- Creating strong passwords
- Using multi-factor authentication
- Being wary of external emails requesting urgent information
- Identifying phishing emails and contacting the Help Desk
- Speaking Up right away if our assets are lost or stolen

Stay alert ... if something doesn't seem right, contact the Help Desk immediately.



FOCUS UP

I am having trouble accessing my Berry email account and I need to send a document with confidential information. Can I send it from my personal email account?



We understand that technology challenges can be frustrating. However, you cannot use a personal email account for business purposes. Contact the Help Desk immediately to resolve your issues.

FOCUS UP

I recently heard of news that could positively impact our stock price. I don't know if the rumor is true, but I don't want to miss a great opportunity. Can I purchase shares of stock?



No, because if the rumor is true, then you are in possession of material nonpublic information. Buying (or selling) shares based on material nonpublic information is considered insider trading, which is not only unethical, but illegal.

Insider Trading

We may become aware of company information throughout the course of our work that is not known to the public. When this information would have an impact on whether a trader would buy or sell company securities, it is referred to as "material, nonpublic information" until it becomes public or is no longer material. Any officer, director or employee of the company who has material nonpublic information is an insider.

It is unethical and illegal for an insider to trade in company securities or share material, nonpublic information with others as that gives them an unfair advantage. You are held accountable for trading when in possession of inside information while being employed at Berry.

Examples of material nonpublic information include:

- Future material financial results
- Anticipated material mergers, acquisitions, and divestitures
- Material new product development
- Upcoming executive leadership changes
- Pending material litigation

Be sure to comply with our Securities Trading Policy, including all blackout periods referenced in the policy. If you are unsure whether information is material nonpublic information, treat it as though it is. Ultimately, the responsibility is on each and every one of us to trade with integrity and in compliance with the law.

Our World

Sustainability

Always advancing to build a more sustainable future is both our sustainability mission and the mindset we embrace. We strive to create goods and services that do not damage the ability of future generations to provide for themselves.

Plastics are the most diverse, innovative substrate. We believe plastics are the best material across our many, diverse products and applications. Benefits of plastics include:

- Saving and enhancing lives
- Reducing food waste by extending shelf-life and protecting food throughout the supply chain
- Having a lower overall environmental impact compared to alternatives
- Using less energy and water compared to alternative substrates
- Generating less greenhouse gas emissions and waste compared to alternatives
- Plastic packaging being widely recyclable
- Allowing for lightweighting, which both reduces the natural resource consumption and increases transport efficiency

Despite these many benefits, we recognize the need to continuously improve our products and processes to ensure responsible consumption and production. We must honor our commitment to **Operation Clean Sweep**® and prevent the loss of resin to the environment. We must design our products to optimize material use, including designing packaging to be reusable, recyclable, or compostable. We must increase our use of recycled and renewable raw materials. We must also optimize our processes to minimize consumption of energy and water, as well as, generation of waste and greenhouse gas emissions. Finally, we must increase our use of renewable energy in place of energy derived from fossil fuels. By proactively addressing these many challenges, we will not only be prepared for, but also lead, the transition to a circular economy with net-zero greenhouse gas emissions.

If you want to get more involved in our sustainability efforts, please contact anyone on your facility's sustainability team. If you are unsure whether your site has a sustainability team, please ask your Manager or Human Resources.





FOCUS UP

I recently visited a supplier and noticed children working on the line in very unsafe working conditions. I understand that not everyone has the same standards as Berry, but I can't ignore what I saw. What should I do?



As a global organization, we understand and respect cultural differences. However, our commitment to the UN Global Compact and ILO's Declaration on Fundamental Principles and Rights at Work remains uncompromised. These commitments inform our Global Human Rights Policy, which confirms we not only prohibit child labor and poor working conditions in our facility, but also within our supply chain. Be sure to contact your Manager or Ethics & Compliance once you become aware of the situation.

Citizenship in Our Communities

The communities where we live and operate are integral to our success. We are all encouraged to give back to our local communities. Whether time, talent, or resources, we have an opportunity to make an immediate impact and support future generations. We believe small actions can have a big impact, especially when we leverage our scale for good.

Community involvement is both a company and individual responsibility. We see the power of that when they come together. Berry strives to provide volunteer events, such as World Cleanup Day, where team members (and their families) can pick up litter and improve the communities around the world in which we work and live.

If you have a volunteering idea or would like to organize a volunteering event, we encourage you to speak with your Manager or Human Resources.

Political Activity

Berry encourages its team members to participate in the political process. However, we cannot use company resources – time, facilities, or funds – to further our personal political interests. You will not be reimbursed for political contributions to a candidate or party. We should not pressure one another or our business partners to participate in the same political activities as ourselves. Your employment status will not be impacted by your political affiliation, but we encourage you to be respectful of others' choices.

Berry works directly and indirectly with governments around the world. It is especially important then that we do not use our role at Berry to influence a government decision. We must be honest and transparent in our business dealings and cannot give anything of value to a government official in hopes to gain a business advantage.

Human Rights & Anti-Slavery

Berry respects the human dignity and worth of all people. Following the United Nations' Guiding Principles on Business and Human Rights, we will adhere to and promote human rights in our operations and throughout our supply chain. We believe all work is voluntary, which means we condemn all forms of forced labor. We do not permit child labor at our facilities and expect our suppliers to adhere to the same policy.

We are also committed to creating a workplace that is free from discrimination and promotes a strong safety culture. We follow all local laws, regulations and customs in regards to wage and hour compliance. We understand the risks associated with modern slavery (including forced labor, bonded labor, child labor and human trafficking) and we hold ourselves and our suppliers accountable to **Speak Up** if something doesn't seem right. For more information, visit our Global Human Rights Policy.

If you have reason to believe there is a human rights violation at one of our facilities or in our supply chain, contact Human Resources, Ethics & Compliance, or Legal immediately.





Our Global Additional Resources

Communications pr@berryglobal.com

Cybersecurity helpdesk@berryglobal.com

Ethics & Compliance compliance@berryglobal.com

Ethics Helpline <https://berryglobal.ethicspoint.com>

Investor Relations ir@berryglobal.com

Legal legalsupport@berryglobal.com

Regulatory Affairs regulatoryaffairs@berryglobal.com

Sustainability sustainability@berryglobal.com

Trade Compliance gtc@berryglobal.com

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