



Adopted July 16, 2015

International Trade Compliance Statement

All Berry Global Group, Inc. (“Berry”) divisions and facilities comply with applicable laws and regulations governing international trade and other international transactions including but not limited to: importation, exportation, re-exportation, disclosures of technical data to foreign persons, participation in boycotts, employment of foreign nationals, payments to government officials, and sales of goods to governmental entities.

In addition, all Berry divisions and facilities comply with internal International Trade Compliance Policies, which may impose greater restrictions on the activities of Berry divisions and facilities than applicable law may require. Any Berry employee who, in the Company’s sole opinion, violates these Policies, will be subject to disciplinary action, up to and including discharge.

Specific policies are created, maintained, and overseen by the International Trade Compliance Group under the Legal Department. The policies are intended to identify and address trade compliance risk across the organization through the application of locally administered processes. It is the responsibility of the International Trade Compliance Group to communicate these policies to the appropriate people within Berry and to explain each employee’s specific responsibilities related to these policies.

International Trade Compliance Policy

Each Berry business (i.e. unique entity with transactions subject to trade laws and regulations) shall have appropriate and documented processes in place to address compliance with applicable trade laws. The Berry policies outlined below specify the primary areas of trade risk and the requirements for each. The Berry Global Corporate Trade Compliance Department will provide support and tools to help the business evaluate, document, and maintain processes.

IMPORTS

The business shall maintain adequate processes related to the filing of *Customs Entries* that properly *Classify*, *Value*, and report the *Origin* of goods. Imports are *Marked and Labeled* in compliance with the customs requirements. Goods subject to *Antidumping Duties*, *End-Use Provisions*, or *Trade Preference Agreements* are properly identified and managed. Goods being *Returned* or *Temporarily* imported are properly declared.

EXPORTS

The business shall file complete and accurate *Export Declarations*. Transactions and contracts must be properly *Screened* against denied party lists, embargoes, sanctions, etc. to determine export (including *Re-export* and *Deemed Export*) prohibitions under U.S. and local country law and reviewed for illegal *Anti-Boycott* language. Exported goods are properly *Classified*, *Country of Origin* assigned, and *License* determinations made, in advance of export. Goods are properly certified under *Free Trade Agreements*.

Updated: November 4, 2017

IMPORTS

- Customs Entry
- Classification
- Duty Concessions
- Valuation
- Country of Origin
- Marking & Labeling
- Antidumping Duty
- End-Use Provisions
- Trade Preference Agreements
- Returned Goods
- Temporary Imports

EXPORTS

- Export Declarations
- Screening
- Re-export
- Deemed Export
- Licensing
- Anti-boycott
- Classification
- Country of Origin
- Free Trade Agreements

SPECIAL TRADE PROGRAMS

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SPECIAL TRADE PROGRAMS

Duty Drawback programs and *Duty Suspension Regimes* (e.g. free trade zones, bonded warehouses, Inward and Outward Processing Regimes) are properly authorized and established. Inventories and documents are properly tracked, reported, and managed. Claims, admissions, withdrawals, and periodic filings are submitted timely and accurately. Certifications are properly obtained or completed and submitted for any preferential trade claims under *Free Trade Agreements*.

CUSTOMS

Duty Payments are accurate and timely. *Correction and Disclosure* of errors are properly submitted. *Rulings* are obtained where needed or beneficial. *Examinations and Inspections* by local government authorities are monitored and issues resolved promptly. Any *Disputes* or *Government Audits* are documented and resolved.

Supply Chain Security programs (i.e. C-TPAT, AEO, PIP) are properly considered and implemented where needed or beneficial. The program is maintained to ensure continued adherence to the requirements and proper, timely reporting. Audits are conducted to ensure compliance.

INTERNAL COMPLIANCE

Significant Compliance Risks and any fines or penalties resulting from trade violations are *Reported* to the Corporate Global Trade Compliance Department. *Self-Assessments* are conducted regularly on processes and transactions. *Systems Logic* is documented and supports the management, validation, and documenting of international transactions. A *Training* plan is established to identify and regularly inform impacted employees of compliance concerns.

Business Change is assessed to determine the impact on the compliance program. *Sales Contracts* are reviewed for import and export compliance risks.

ADMINISTRATIVE

Business authorization for import and/or export activities is obtained and *Bonds* procured where required by the trade activity. Importer and/or exporter *Identification Numbers* and bonds are tracked to ensure they remain valid and sufficient. *Trade Services* provided to related companies consider local trade and tax laws. *Inter-Company Pricing Agreements* and *Adjustments* are considered when determining value for customs.

Agents and *Advisors* are properly selected and engaged for the outsourcing of or consulting on compliance activities.

CORPORATE SUPPORT

International Trade Compliance Policies are published and communicated to the business. The *Global Trade Compliance Department* confirms alignment between corporate goals, processes and activities and the International Trade Compliance Policies. They provide support to the business to ensure the policies are understood and processes are adapted in support thereof. Changes to the *Legal Entity* structure including *Mergers, Acquisitions, and Disposals* are evaluated and the impact on the International Trade Compliance Policies is communicated.