



## Non-Retaliation Policy

### Purpose

Berry Global Group, Inc. and its subsidiaries (collectively, “Berry”) strives to maintain the highest ethical standards, which includes creating an environment where employees, or other stakeholders, feel comfortable speaking up when they believe misconduct has occurred. This policy confirms our commitment to zero-tolerance for retaliation and assures all employees that they should feel comfortable reporting a concern.

### Scope

This policy applies to all Berry employees, former employees, officers, suppliers, contractors, customers, and other business partners. Berry will strive to ensure all employees, and other key stakeholders, are aware of our commitment to non-retaliation and encourage anyone to report concerns without fear of retaliation about actions or decisions that run contrary to Berry’s Code of Business Ethics or Berry policies. Management has the additional responsibility of modeling the right behavior and immediately reporting any concerns of retaliation.

### Policy

#### Definitions

- Ethics Committee
  - The Ethics Committee is a cross-functional team within Berry consisting of senior leaders around the globe and representing each of the divisions. It’s their role to provide operational guidance to the Ethics & Compliance Program.
- Retaliation
  - Negative action taken to alter an individual’s current work environment or business relationship with Berry as a consequence of speaking up or cooperating in an investigation.

Berry believes that every employee should be empowered to speak up when they have reason to believe misconduct has occurred or will likely occur. We understand that some people may be hesitant to speak up because they fear retaliation. Retaliatory actions may include receiving a demotion, being reassigned projects, feeling harassed, or being dismissed. Berry has zero tolerance for retaliation. Such actions may lead to discipline, up to and including termination.

There are many ways to report a concern. First, you are encouraged to speak with your Manager, Human Resources Manager or anyone in senior leadership. Second, you can reach out to anyone on the Ethics Committee. Finally, you can always use the confidential reporting Helpline or web-based system -

<https://secure.ethicspoint.com/domain/media/en/gui/39248/index.html>.

By using our 24/7 Helpline, an individual has the option to remain anonymous. A report of their concern will be taken by our third-party provider and sent directly to the person who needs to



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know at Berry. The report will be investigated in a thorough and timely manner. We understand the importance of confidentiality and will preserve that to the greatest extent possible. While anyone can remain anonymous, it is always helpful when the reporter identifies themselves to allow a more thorough and complete investigation of all details.

Berry does not expect the reporter to have all the facts in order to raise a concern. It may be that they heard an issue second-hand or only partially witnessed an event. Despite not having all the information, it is still important that all reports are on the basis of genuine concern. By this we mean the person who raises the concern has reason to believe misconduct occurred and will likely occur. In such instances, there are no ulterior motives or hidden agendas; instead, they are merely calling out behaviors and decisions not consistent with our Code of Business Ethics or policies.

Berry takes all claims seriously. So, if an individual makes a claim in bad faith, that is, intentionally accuses someone of wrongdoing despite not having a reason to believe misconduct occurred, or intentionally misleads an investigation, she or he will be subject to discipline, up to and including termination.

Because Berry believes in creating a safe and positive work environment, retaliating against those who raise a concern in good faith has no place here. All employees should expect to be free from such actions. We have zero-tolerance for those who retaliate against others. If you believe that you have been retaliated against, we encourage you to talk with your Manager, Human Resources Manager, anyone on the Ethics Committee or contact the 24/7 Helpline.

### Version Control

Date	Version Number	Purpose/Change	Author/Approver
April 14, 2021	1.0	Original Version	Chief Legal Officer