



Product Safety and Quality Management Policy

At Berry, we are dedicated to assuring that every product we market can be safely used, and we have programs and processes in place to fulfill this responsibility. Our regulatory department has a lead role in ensuring the safety and compliance of all raw materials that are selected for use in our products.

Product Safety Management

Every company making products that are put into the market has the obligation to assure that their products are safe for their intended purpose, and every person or company buying goods expects that appropriate safety work has been done behind the scenes and underlie decisions to put products into the market. Berry Global endorses this obligation; our product safety management program ensures that we develop products and product solutions that are safe, compliant, and reliable, and we document the underlying basis. All proposed raw materials are screened for hazards and for compliance issues prior to their approval for use. This screening assures that when products are developed and manufactured that they are safe for their intended end use and that any appropriate information related to the product is disclosed. Our program assesses all raw materials used in our portfolio and monitors the performance of our finished products.

Chemical Safety

At Berry, we have an active and robust product safety program. All newly proposed raw materials are subjected to a regulatory review screening process which 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.

Finished Goods

We provide product regulatory information on-demand for any finished good in our portfolio. Regulatory information is collected from raw material suppliers for each raw material present in the composition, providing overall regulatory information for the finished good(s) of interest. We often work with customers who have implemented restricted substance lists (RSL) or Substances of Interest (SOI) lists to reformulate existing products to remove specific substances. This work reduces the overall footprint of our finished goods and helps the customers to meet their internal and external stakeholder expectations. Raw material product literature is loaded into systems to enable accessibility for assessments across our employee network, and regulatory information for each approved raw material is linked with the assigned raw material item number and loaded into our Enterprise Resource Planning (ERP) system.

Product Testing

Testing is conducted as needed to verify product safety and to demonstrate regulatory compliance, and this testing is part of an internal protocol conducted before new products are introduced into the market. Biocompatibility testing is conducted for nonwoven products sold for use in hygiene and healthcare applications, and products involved in food contact applications are tested as needed to demonstrate compliance with food contact rules in the region(s) where the product is intended for sale. Where we manufacture closures for containers holding products which require child-resistant openings, as designated by agencies such as the Consumer Product Safety Commission (CPSC), we are subjected to Protocol testing which demonstrates the effectiveness of the child-resistant feature(s) designed into the closure.

Product Registration/Certification

Where finished goods require product registrations according to certain industry standards or customer requirements, we ensure we hold the appropriate registrations. We also provide support to customers with products containing our components, that require ECO certifications such as Blue Label, EU Ecolabel and Swan Ecolabel. Where necessary, a number of our products have Oekotex certification.



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Management of Change

Our active Management of Change (MOC) program is intended to assure that changes to finished goods meet all safety and regulatory requirements, customer specification and contract conditions, product functionality and performance equivalence.

Global Regulatory Monitoring

We actively monitor regulatory activity which could affect our operations and products, using subscription-based services, 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 us to assess the potential business impact from new regulations, implement actions required to assure compliance and provide an opportunity to comment on proposed legislation. In cases where new regulations have an impact on existing products, we work with our suppliers to identify alternate raw materials and/or develop new products which meet the new requirements. We often reach out to suppliers requesting reformulated raw materials to eliminate certain regulated chemicals or move to chemicals that reduce the overall environmental footprint of our products.

Policies

In addition to our Restricted Substances List (RSL) outlined below, we have established a number of internal product policies to ensure appropriate product safety management, including policies on Implant and Fluid – Tissue Contact Application, California Proposition 65, and Pesticides (ingredients and products). Additionally, we have a publically available product stewardship policy, which can be viewed on our website.

Restricted Substances

We implemented a universal Restricted Substance List (RSL) to help guide sustainable products and development activities. Raw materials containing Conflict Minerals, heavy metals, Substances of Very High Concern (SVHC), natural rubber latex, ozone-depleting substances (ODS), PFOA/PFOS and Restriction of Hazardous Substance (RoHS) chemicals are restricted from purchase and use. Raw materials containing California Proposition 65 listed substances are subject to internal controls including appropriate risk mitigation steps; a review of alternate material options having the desired functionality, finished good testing to confirm the presence or absence of the listed substance, and exposure modeling where applicable. In Goods where a palm oil or palm kernel oil derivative is used (i.e. as a stabilizer), we encourage the use of Roundtable on Sustainable Palm Oil (RSPO) feedstock.

Many consumer-facing companies that use our goods as packaging or components of their Goods have implemented their own Restricted Substance List (RSL). In addition to meeting Berry internal restriction requirements for raw materials, Berry also conforms to customer-specific RSL requirements. This combination of internal and customer-driven requirements allows Berry to meet the needs of its customers.

Our RSL Policy is publicly available on our website.

Product Quality

We are committed to being a leader in providing high-quality products to our customers, through responsible sourcing and innovative design. Our skilled employees work to meet the practical and regulatory needs of our customers, whilst further developing advanced sustainable solutions, and through our established quality management program, we set annual goals, monitor the product regulatory landscape, and respond to changing market dynamics. As part of our drive towards continuous improvement and standardization, we encourage our facilities to participate in global quality system standards including ISO 9001, ISO 15378, ISO 13485, FSSC 22000, ISCC+, BRC, and SQF.

Our Quality Policy is publicly available on our website.