



Conflict of Interest Policy

Purpose

Berry Global Group, Inc. and its subsidiaries (collectively, “Berry” or the “Company”) expects all employees to make decisions that are in the best interest of the Company. If an employee encounters a situation in which their personal interests conflict with that of the Company, or even have the perception of a conflict, it is important that they disclose it immediately.

Scope

All Berry employees are expected to follow this policy. Managers will have an additional responsibility to be familiar with this policy in order to either answer initial questions their team members may have around a potential conflict of interest or request additional support from Human Resources or the Ethics & Compliance Team.

Policy

Definitions

A conflict of interest is **actual** when an employee is unable to make an impartial decision on the Company’s behalf. However, it is not always the case that an actual conflict of interest is occurring; instead, the mere perception of a conflict may exist. Here, a **perceived** conflict of interest occurs when there is an appearance of a conflict between someone’s personal interests and that of the Company. We take these matters just as seriously since perceived conflicts may raise doubts from others (e.g., co-workers, customers or suppliers) about one’s ability to make an impartial decision for the Company. Finally, a conflict of interest is **potentially** real when an employee’s private interests have not yet resulted in an actual conflict, but have a possibility of arising.

Examples of a Conflict of Interest

- Family or Personal Relationships
 - Family or close relationships present an actual, perceived or potential conflict of interest when an employee is unable to act in the best interest of the Company because of the close personal relationship. By “family” or “close” personal relationship, we mean immediate or extended family members, such as spouses, domestic partners, siblings, brother- and sister-in-laws, children, step-children, adopted children, parents, grandparents, aunts and uncles. An employee should have no decision-making authority that would impact a close personal relationship, for instance, hiring them to join the Company or selecting them as a supplier or business partner.
 - An actual or perceived conflict may arise in the case of an employee reporting/supervisory relationship. Employees must disclose personal relationships where a direct or indirect reporting/supervisory relationship exists or when the relationship could cause embarrassment to the Company. This will help us make the best decision to avoid the appearance of favoritism.



Conflict of Interest Policy

- Financial Interests
 - There are situations where having a financial interest in a supplier, business partner, customer or competitor of Berry's may result in an actual, potential or perceived conflict of interest. If you have a significant stake in a Berry supplier, business partner, customer or competitor, be sure to disclose it to your Manager or the Ethics and Compliance Team (compliance@berrycglobal.com). The one exception to this would be owning an immaterial or insignificant interest in publicly-traded companies. The term "immaterial" is different for everyone and the Company will look at each situation on a case-by-case basis.
- Business Opportunities
 - We have an obligation to make decisions that are in the best interest of Berry and this includes identifying new opportunities that benefit the Company. An opportunity that is discovered through employment with us where you, or a close personal relationship, stand to gain a personal advantage, must be disclosed and approved by the Company's Chief Legal Officer.
- Outside Employment
 - Berry understands that employees may have a job outside the Company. In such instances, we expect those activities to occur outside of regularly scheduled Berry working hours. It is not only a conflict of interest, but an abuse of Company resources if you use Berry assets (e.g., printing, time or facilities) for outside employment.
 - If an employee plans to serve on a Board of a Berry competitor, supplier or customer, approval will be required from the Company's Chief Legal Officer. In addition, if you are a Board member or decision-maker for an organization that seeks donations from Berry, you must disclose to your Manager and the Ethics & Compliance Team (compliance@berrycglobal.com) to avoid the appearance of a conflict of interest.
- Gifts, Travel and Entertainment
 - Berry believes in the value of building long-lasting relationships with our business partners. This may result in giving and receiving nominal gifts, such as company-issued pens and coffee mugs. Berry defines a gift as nominal if it is less than US\$75 annually. Offering or receiving gifts run the risk of not only appearing to be a conflict, but can easily have the potential to become an actual conflict, if the business gifts become lavish. It is never acceptable to give or receive a gift that influences a person's decision, which becomes a conflict as it prevents them from remaining impartial. For more guidance on giving and receiving gifts, please see the Berry Gift and Entertainment Policy.

Disclosing a Conflict of Interest



Conflict of Interest Policy

Berry expects any employee who believes they may have a conflict of interest to speak with Human Resources, their Manager or contact the Ethics & Compliance Team at compliance@berryglobal.com.

Discipline

Failure to disclose a conflict or ignoring guidance to cease a relationship that creates a conflict of interest will result in disciplinary action up to, and including, termination.

Version Control

Date	Version Number	Purpose/Change	Author/Approver
17, June 2021	1.0	New Policy	Jason Greene