



Conflict Minerals Policy

Purpose

Berry Global Group, Inc. and its subsidiaries (collectively, “Berry”) understands its role in the supply chain to identify any potential Conflict Minerals originating in the Democratic Republic of Congo (DRC) and its nine adjoining countries, including Angola, Burundi, Central African Republic, Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda and Zambia (collectively, “Covered Countries”) in a broader effort to support human rights in the Covered Countries. This policy shows our commitment to follow the Organization for Economic Cooperation and Development (OECD) guidance on sourcing responsibly and complying with Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (Dodd-Frank).

Scope

This policy applies to all Berry employees and suppliers. All employees have a responsibility to be aware of any potential risks for Conflict Minerals, and if we believe they are in our products or supply chain, to speak up. We also have the obligation to collect information from our suppliers to understand if they source products with Conflict Minerals and document that information according to Dodd-Frank. We expect our suppliers to respond to our request in a timely manner for information around mineral country of origin and the use of smelters and refiners.

Policy

Definitions

- Conflict Minerals
 - Conflict Minerals include cassiterite, columbite-tantalite, wolframite and their derivatives of tantalum, tin and tungsten (3Ts), along with gold.
- DRC Conflict Free
 - Products that contain Conflict Minerals that do not directly or indirectly finance or benefit armed-conflict in the Democratic Republic of the Congo and adjoining countries.

Berry is committed to transparency in the supply chain. Ensuring that we source responsibly is a standard we hold for ourselves and our supply chain. As stated in our Supplier Code of Conduct, we expect all suppliers to provide relevant information on Conflict Minerals when such requests are made.

We draw from the OECD’s “Five-Step Framework for Risk-Based Due Diligence in the Mineral Supply Chain” to guide our Conflict Minerals program. The steps include:

1. Establish a strong management system
2. Identify and assess risks in the supply chain
3. Design and implement a strategy to respond to risks
4. If necessary, leverage third parties to conduct audits of our suppliers



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5. Report on supply chain due diligence efforts

We are committed to conducting due diligence by surveying our suppliers to understand any potential risks surrounding Conflict Minerals. If we identify a product that contains Conflict Minerals, we are responsible for conducting a Reasonable Country of Origin Inquiry (RCOI) to determine whether the minerals are DRC Conflict Free. Following Dodd-Frank, we will disclose our progress towards transparency of Conflict Minerals in our supply chain.

Red Flags

We all have a responsibility to understand the risks associated with Conflict Minerals. The following red flags help in that identification. If you come across any of the following, be sure to speak up:

- Minerals originating from, or transported through, Covered Countries
- A supplier who is unwilling to complete a Conflict Minerals survey request
- Minerals originate from recyclable or scrap sources and have been refined in a Covered Country
- A supplier, or other upstream companies, have sourced minerals from Covered Countries in the past 12 months
- A supplier has an interest in a company that supplies minerals from Covered Countries

Speaking Up

Berry encourages employees to stay alert for red flags surrounding Conflict Minerals. You are always encouraged to speak with your Manager, Compliance or Legal, if you have any questions. We also have a confidential reporting Helpline to raise any concerns. Visit our Helpline online at <https://secure.ethicspoint.com/domain/media/en/gui/39248/index.html> to report a concern or find your country phone number to call the Helpline. Berry prohibits any form of retaliation for reporting a concern in good faith.

Version Control

Date	Version Number	Purpose/Change	Author/Approver
March 4, 2021	1.0	Original Version	Chief Legal Officer