

**BERRY GLOBAL, INC. (“Berry”)
GLOBAL ACQUISITION and ACCOUNTABILITY
POLICY**

The California Transparency in Supply Chains Act of 2010 (“CTSCA”) went into effect on January 1, 2012 for manufacturers and retailers that meet one of certain doing business criteria in California. This law is intended to provide information to the public concerning the affected companies’ efforts, if any, to eradicate slavery and human trafficking and thereby allow other companies and consumers to make more informed purchasing decisions.

A bill containing disclosure provisions similar to those in CTSCA was introduced in the U.S. House of Representatives on August 1, 2011, the Trafficking Victims’ Protection Reauthorization Act of 2011 (“TVPRA”), which seeks to expand the current protections provided under the federal Victims of Trafficking and Violence Protection Act of 2000 (“VTVPA”) and which likewise addresses the evils of slavery and human trafficking.

Berry embraces efforts to eradicate these heinous practices and supports laws that ensure that all workers at suppliers’ facilities have the right to freely choose employment and be accorded basic human rights in the workplace. This policy statement outlines our policies and procedures to comply with applicable laws and act as a responsible global corporate citizen and in a manner that reflects our corporate values. Our customers, from Fortune 500 companies to start up enterprises, rightly expect us to be a leader in principled procurement and we expect the same of our suppliers. We will always be guided not only by what is legislated but by what is right.

In furtherance of this policy, we do the following:

1. **Risk based supplier assessments:** We perform assessments of suppliers and potential suppliers including preliminary risk assessments based on our history with existing suppliers and the public information available on existing and prospective suppliers. Risk factors considered include the country or countries from which materials are acquired, the type of materials, all available company history including media articles, and NGO reports.
2. **Supplier verification/certification:** We have instituted a program of verification of supply chains by requiring all suppliers to certify in writing that: (i) no materials supplied to Berry are produced directly or indirectly by means of slavery or human trafficking; (ii) they comply with all applicable laws regarding slavery and human trafficking of the country or countries in which they do business, including CTSCA and VTVPA as well as TVPRA if it becomes law; and (iii) they require at least the same degree of compliance of all of their suppliers. All new written agreements with suppliers and standard terms of purchase orders will contain promises by the supplier to comply with the foregoing requirements. At present, supplier verifications are not conducted by third parties.

3. **Audits:** While we do not currently conduct independent, unannounced audits, we stand ready to do so if it comes to our attention that there is a heightened degree of risk in any particular supply chain. We will periodically update all supplier verifications.
4. **Training of procurement personnel:** We have instituted and will periodically update a training program for all employees and management personnel who have direct responsibility for supply chain management to educate them on slavery and human trafficking and spot its signs and know what to do to mitigate risks in the supply chain. Our training includes an introduction to ISO 26000 Social Responsibility Standards, the UN Palermo Protocol on Human Trafficking and the current U.S. State Department Trafficking in Persons Report.
5. **Internal accountability standards:** We maintain internal accountability standards and procedures for employees and contractors failing to meet our standards. In case of a finding of failure to uphold these standards, further training will be provided.

Additionally, in furtherance of our responsible global acquisition and accountability policies, we require all suppliers to certify compliance with all applicable anti-bribery laws of countries in which they do business (Foreign Corrupt Practices Act of 1977, U.K. Bribery Act, etc.). Lastly, although Berry's business includes only a very few products that use even trace amounts of any affected minerals, we require our material suppliers to certify that none of those minerals (tin, tantalum, gold, and tungsten) originated in the Democratic Republic of the Congo or an adjoining country and that they comply with the conflict mineral provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010. These requirements are also in our purchase order terms and conditions. In general, we strive to meet ISO 26000 standards and emphasize the importance of taking steps to bring as many suppliers as possible up to those standards.

The management of Berry is committed to being a responsible corporate citizen of the United States and of the world and intends that the company and its employees and suppliers comply with all applicable laws, including those designed to eliminate corruption and human and animal suffering as well as those intended to protect our valuable planet and its resources. For further information, interested parties should contact us at compliance@berryglobal.com.