



Global Human Rights and Labor Standards Policy

Policy Statement

Berry Global Group, Inc. and its subsidiaries (collectively, “Berry”) strive to maintain a working environment, both internally and through our suppliers, that conducts its personnel practices in a manner designed to respect the human rights for all individuals and ensure equal opportunities. Berry operates in accordance with applicable laws and labor standards, Berry policies, and Berry’s Code of Business Ethics.

Scope

This policy applies to all Berry locations and employees. Berry will strive to ensure that its suppliers and business partners adhere to the standards that are outlined within this policy.

Human Rights

Berry is committed to conduct business in a manner that demonstrates respect for internationally-recognized human rights and the dignity of all people. Specifically, Berry operates its business with the following values:

- Respecting the Dignity of All People
 - Berry believes in creating a culture where everyone feels welcome. This begins by respecting the dignity of one another and embracing the diversity that makes us who we are. This is Berry’s fundamental commitment in the communities where we live and operate.
- Freedom from Forced Labor
 - Berry respects the rights of all people, so we will not use or engage in any form of coerced, bonded or indentured labor. All work will be voluntary, and employees will be free to leave or terminate their employment in accordance with local and national laws without fear of physical, psychological, sexual, or verbal abuse.
 - Berry prohibits the use of slavery and human trafficking in our facilities, by our suppliers and business partners. Slavery includes forced labor, in addition to bonded labor and domestic servitude.
 - Berry will not require employees to lodge “deposits” of their identity papers (e.g., government-issued identification, passports, or work permits).
- Rights of Children
 - Berry does not allow child labor in its operations. We also believe children should not be forced or coerced into trafficking, bonded labor or servitude. The term “child” means any person under the minimum legal age for being employed in the workplace, which in most instances is fifteen (15) years of age. Typically, Berry does not hire anyone under the age of eighteen (18) unless apprenticeships or internships are permitted by local law.
- Rights of Indigenous Peoples
 - Berry will not take actions which would infringe upon the rights and customs of indigenous peoples including, for example, rights to autonomy, self-determination and retaining their own customs and institutions.
- Fair Compensation



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- Berry believes in fairly compensating its team members according to local markets. We comply with all applicable minimum wage, overtime, and benefits practices that relate to applicable local and national laws and regulations and require our suppliers to do so as well. In a country where no minimum wage law applies, Berry pays its employees at a rate comparable to the prevailing industry average of that country.
- Hours of Labor
 - Berry ensures that working hours are consistent with local regulations, customs, or common practice and are not excessive except where operational circumstances dictate otherwise.
- Work Environment
 - Berry is committed to providing a workplace that is respectful and free from all forms of unlawful discrimination and harassment, including national origin or ancestry, citizenship, age, religion, race, sex, sexual orientation, and abilities, amongst others. We will maintain a healthy, clean, and safe work environment and will not utilize mental or physical disciplinary practices. Berry will construct and maintain all facilities in accordance with the standards set forth by applicable laws and regulations in the countries in which it operates.
- Immigration Law & Compliance
 - Berry only employs workers with a legal right to work. We validate all workers' legal status in accordance with applicable law before they can commence work.
- Freedom of Association
 - Berry respects the freedom of association. We will cooperate in good faith with the trade unions that represent our employees within the appropriate national legal frameworks.

Speaking Up

Berry encourages anyone who sees something that doesn't seem right, to say something. Feel free to speak with your Manager, Human Resources or Legal, if you have any questions. We also have a confidential reporting Hotline to raise any concerns at (888) 307-2815 or <https://secure.ethicspoint.com/domain/media/en/gui/39248/index.html>. Berry prohibits any form of retaliation for reporting a concern in good faith.

Responsible Party

Berry's Chief Human Resources Officer and Chief Legal Officer are jointly responsible for administering and amending this policy.

References

[Modern Slavery Act Transparency Statement](#)
[Supplier Code of Conduct](#)