



## **BERRY GLOBAL GROUP, INC. MODERN SLAVERY ACT STATEMENT**

### **Introduction**

This statement is made in accordance with Section 54 of the UK Modern Slavery Act 2015 and sets out actions taken by Berry Global Group, Inc. and its subsidiaries, including UK-based RPC Containers Limited, British Polythene Limited, Maynard & Harris Plastics, Massmould Limited and Plasgran Limited (collectively, “Berry Global”) to understand potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in its own business and its supply chains. During the 2020 fiscal year we focused on the integration of recently acquired RPC Group plc with Berry Global, including efforts to build a comprehensive compliance program across our global organization.

Berry Global is a leading global supplier of a broad range of innovative rigid, flexible, and non-woven products used every day within consumer and industrial end markets. We have more than 47,000 employees and generated approximately \$13 billion of sales in fiscal year 2020 on a combined pro forma basis from operations that span over 290 locations on six continents. Berry Global’s supply chains include the sourcing of polyolefin-based resins, inks, and other raw materials, packaging components, and equipment. Berry’s approach to its supply chain is one of “local value delivery,” that is, we try to source intra-country whenever possible. We develop long-lasting relationships with our suppliers, which allows us to better understand their business models and commitment to following our Supplier Code of Conduct, including anti-slavery and anti-trafficking expectations.

As part of a global economy, our organization recognizes that it has a responsibility to take a robust approach to slavery and human trafficking. Berry Global is deeply committed to compliance with laws of all jurisdictions in which we do business, including laws designed to eliminate slavery and human trafficking, and expects all employees to adopt this commitment. Berry Global expects the same high standard of our diverse supply chain.

Slavery and human trafficking are serious problems in many parts of the world. While we have not been directly affected by these issues, as an organization, Berry Global understands our responsibility to be aware of them and intends to do our part to combat slavery and human trafficking. The functions of Purchasing, Legal, Human Resources, and Ethics and Compliance work together to track applicable laws, develop risk assessments, raise awareness around policies and procedures, and conduct training.

### **Relevant Policies and Procedures**

Berry Global operates under the following policies and procedures that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations and supply chain. We continue to transition these policies and procedures as part of our ongoing integration of the recently acquired RPC group entities:



- **Global Human Rights.** Berry Global’s policy on human rights is designed to combat modern day slavery and human trafficking. The policy applies to all Berry Global employees and may be used to hold our suppliers and business partners accountable. It highlights our respect for internationally-recognized human rights and the dignity of all people. This includes, but is not limited to: freedom from forced labor, respecting the rights of children and indigenous peoples, compensating team members fairly, providing a safe work environment, following local laws and regulations and respecting freedom of association.
- **Speaking Up.** Berry Global encourages all its employees, customers, and other business partners to report any concerns related to the direct activities of the organization or in its supply chain. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organization's whistleblowing procedure is designed to make it easy for employees, or any stakeholder, to say something if they see something, without fear of retaliation. We use a software-based system to support our helpline and incident management program. This helps us identify the initial severity of the concern in order to escalate, if necessary, and address it in a timely manner. Any issues around slavery and human trafficking would be categorized as a “high risk” and the corresponding response would be met with equal attention. Employees, customers or other stakeholders who have concerns can use our 24/7 Helpline to report any concerns. Although the RPC entities have retained a separate software-based helpline post-acquisition, the investigative process has been kept consistent across the organization. This helps ensure timely investigations and disciplinary fairness and consistency.
- **Code of Business Ethics.** [Berry Global's Code of Business Ethics](#) makes clear to employees the actions and behaviors expected of them when representing the organization. In fact, it provides questions for someone to ask themselves in order to help their decision-making process, including: Is it illegal? How will you feel about the decision? How will others feel? How would you feel if the world knew about the decision? Does it make sense? Is it fair? Will management approve? These questions are meant to have people think before making a decision, and if they are unsure, to seek guidance from their manager, Human Resources, the Ethics Committee or the Legal Department. The Code of Business Ethics is the foundation for our organization to maintain the highest standards of employee conduct and ethical behavior when operating globally and managing its supply chain.
- **Supplier Code of Conduct.** Berry Global is committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labor. We reserve the right to audit our supplier facilities and are willing to work with them to ensure they meet the standards of Berry’s [Supplier Code of Conduct](#) and provide their workers with appropriate working conditions. Serious violations of the organization's Supplier Code of Conduct may lead to the termination of the business relationship.
- **Global Acquisition and Accountability Policy.** Berry Global’s [Global Acquisition and Accountability Policy](#) outlines our policies and procedures to comply with applicable laws, including the California Transparency in Supply Chains Act of 2010 and the Trafficking



Victims Protection Act that was signed into law on January 9, 2019. It also affirms our commitment to 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.

### **Risk Assessment and Due diligence**

Berry Global performs an annual risk assessment, which includes cross-functional participants from each of our four major divisions, along with Senior Management, including the heads of Legal, Ethics and Compliance, Human Resources and Purchasing. We believe that the risk of slavery and human trafficking in our supply chain is very low. However, Berry also recognizes that the severity of such activities should it become real. This is one reason why Berry Global undertakes due diligence when considering working with new suppliers. New suppliers are required to agree to our current Supplier Code of Conduct and provide relevant certifications, including that (i) no materials supplied to Berry Global are produced directly or indirectly by means of slavery or human trafficking and (ii) they comply with all applicable laws regarding slavery and human trafficking of the country or countries in which they do business.

This has been a uniquely challenging year with COVID-19 and a period during which we have had to remain alert to the potential for modern slavery risks to be impacted, including with respect to the health and safety of workers. While we have not identified new risks, we have worked with teams at all levels in our supply chain to react to the changing landscape to maintain the integrity of a safe and secure supply chain. Most importantly, this has continued to reinforce our ongoing commitment that the health and wellness of our team members remains a top priority.

### **Monitoring**

Berry Global not only performs due diligence on new suppliers, but regularly reviews existing suppliers. The main purpose of these reviews and onsite visits is to ensure they are meeting our standards (e.g., in regards to quality and delivery). However, while reviewing and/or visiting a supplier, we may check their practices to ensure they are not participating in any form of slavery or human trafficking.

### **Training/Awareness-Raising Program**

The Berry Global Legal Department provided live training to the Purchasing Department on matters relating to the eradication of slavery and human trafficking in connection with the California Transparency in Supply Chains Act of 2010. In addition, Berry Global sales and purchasing functions receive yearly online training on transparency in the supply chain, including issues of slavery and human trafficking. These trainings include Senior Management, which we believe is important in order to set the right tone at the top.

As well as training employees, Berry Global has raised awareness of modern slavery issues by distributing flyers, putting up posters across the organization's premises, circulating emails, and posting information on the intranet and internal televisions describing the problem of slavery and



human trafficking, the importance of being a proactive company to help eliminate the problem, and persons to contact with questions.

**Board Approval**

This statement has been approved by the Board of Directors of Berry Global Group, Inc., who will review and update it annually.

A handwritten signature in black ink, appearing to read "T. Salmon", written over a horizontal line.

**Director's name: Thomas E. Salmon**

**Date: October 28, 2020**