



## Product Quality and Safety

Berry embraces its responsibility to provide our customers with safe, high-quality products. We have a number of different programs and processes in place to guarantee that this obligation is met. Our Product Safety Management Program ensures the safety and compliance of all raw materials that are selected for use in our products, while our skilled employees work together to deliver high-quality products that meet the practical, sustainable, and regulatory needs of our customers.

### Product Safety Management

At Berry, we have implemented a robust Product Safety Management Program to ensure we develop products and product solutions that are safe and reliable, and that our processes are transparent and well-documented. The Program is continually evolving; ensuring both the raw materials we use, and the products we manufacture, are compliant with ever-changing legislation. The program includes systems for product testing, certification, providing regulatory information for finished goods, global regulatory monitoring, chemical safety, and deselecting restricted substances, as evidenced by our Restricted Substances List (RSL).

### *Chemical Safety & Transparency*

Our Chemical Safety program requires all newly proposed raw materials to be subjected to a regulatory review screening process, with safety documents and detailed regulatory disclosures collected from the manufacturer or supplier of the raw material. This screening is conducted prior to purchase, to allow us to identify regulatory constraints, EHS concerns, verify freedom to operate, compatibility with other raw materials, sustainability and suitability for intended end uses. The results of the screening are used to make purposeful decisions regarding purchase. If a proposed new raw material is rejected, it does not become part of our raw material portfolio. Each year, a number of proposed materials are rejected which do not meet our rigorous selection criterion.

We have an active post-consumer recyclate (PCR) testing program to supplement information provided by PCR providers and determine if we purchase the PCR or reject it. The program requires analysis of multiple samples of each PCR grade being considered, to be tested for undesirable substances. Following an approval for use decision, we conduct periodic testing to confirm the absence of undesirable substances and verify continued suitability for use. We have recently implemented a PCR supplier development role, which will expand our ability to purchase approved PCR by partnering with our PCR suppliers to improve their understanding of Berry's requirements and regulatory knowledge.

At Berry, we are providing chemical transparency for products which are used for packaging menstrual products. Full compositional information is being provided to customers that use Berry products as components in Menstrual packaging, allowing those customers to make public chemical disclosures for their products. We also provided full chemical disclosures for our entire wipe's product portfolio. This information can be found on the Chicopee® website.



## **Product Safety and Quality Management Policy**

### *Finished Goods*

For any of the finished goods in our portfolio, we provide on-demand product regulatory information using the information collected from the raw material suppliers for each raw material present in the composition. Raw material product literature is loaded into systems to enable accessibility for assessments across our employee network, with regulatory information for each approved raw material linked with the assigned raw material item number and loaded into our Enterprise Resource Planning (ERP) system. Where customers have implemented their own Restricted Substance Lists (RSL) or Substances of Interest (SOI) lists, Berry's product development team can work to reformulate existing products and remove specific substances. This allows us to help our customers meet their internal and external stakeholder expectations.

### *Product Testing*

We conduct product testing as needed to verify product safety and to demonstrate regulatory compliance as part of an internal protocol conducted before new products are introduced into the market.

Biocompatibility testing is conducted for nonwoven products sold for use in hygiene and healthcare applications, and products involved in food contact applications are tested as needed to demonstrate compliance with food contact rules in the region(s) where the product is intended for sale. Berry manufactures child-resistant closures for use on containers which are intended to prevent children from easily accessing certain substances. These closures meet Consumer Product Safety Commission (CPSC) rules and the container and child-resistant closures were subjected to protocol testing, which demonstrates the effectiveness of the child-resistant feature(s) designed into the closure.

In partnership with our customers, products intended for use in healthcare and hygiene markets are tested for Substances of Interest (SOI's). This program not only assures that these products meet all standards and customer expectations for the absence of substances of concern the detection sensitivity used in the testing goes far beyond regulatory requirements. We expanded our SOI testing program in 2022 to ensure it covers a greater number of products and customers.

### *Product Registrations and Certification*

We ensure that where required, our finished goods hold the appropriate registrations according to industry standards and customer requirements. We also provide support to customers with products containing our components, where EcoCert (ECO) certifications such as Blue Label, EU Ecolabel and Swan Ecolabel are required. In 2022 we expanded the number of nonwoven manufacturing sites from three to seven facilities, including three in North America that have Oeko-Tex 100 Certification, which validates that materials used in manufacturing and the resulting products are free of harmful substances.



## **Product Safety and Quality Management Policy**

### *Management of Change*

We operate an active Management of Change (MOC) program to assure that changes to finished goods meet all safety and regulatory requirements, customer specification, contract conditions, product functionality, and performance equivalence.

### *Global Regulatory Monitoring*

We constantly monitor regulatory activity which could affect our operations and products, using subscription-based services, participation in trade associations, list server notifications, weekly newsletters from regulatory agencies and regulatory alerts from law firms, to stay aware of proposed and new regulatory rules. This allows us to assess the potential business impact from new regulations, implement actions required to assure compliance, and provide an opportunity to comment on proposed legislation. In cases where new regulations have an impact on existing products, we work with our suppliers to identify alternate raw materials and/or develop new products which meet the new requirements. We often reach out to suppliers requesting reformulated raw materials to eliminate certain regulated chemicals, or switch to chemicals that reduce the overall environmental footprint of our products. In 2022, we implemented a program to catalog all products containing substances which require a California Proposition 65 disclosure. This assures that we provide warnings where they are required and allows us to manage the portfolio and easily identify where alternate raw material options may be available.

Public and regulatory concern regarding the use of polyfluoroalkyl substances (PFAS) continue to grow. Berry is actively working internally and externally with its suppliers to develop alternate materials to eliminate these substances.

### *Policies*

In addition to our Restricted Substances List (RSL), which is outlined in more detail below, we have established internal product policies to ensure appropriate product safety management. This including policies on Implant and Fluid–Tissue Contact Application, California Proposition 65, and Pesticides (ingredients and products).

### Restricted Substances

We implemented our universal RSL to help guide sustainable product development activities. Raw materials containing conflict minerals, heavy metals, Substances of Very High Concern (SVHC), natural rubber latex, ozone depleting substances (ODS), Perfluorooctanoic acid/ Perfluorooctane sulfonate (PFOA/PFOS), and Restriction of Hazardous Substance (RoHS) chemicals are restricted from purchase and use. Raw materials containing California Proposition 65 listed substances are subject to internal controls including appropriate risk mitigation steps, namely a review of alternate material options having the desired functionality, finished good testing to confirm the presence or absence of the listed substance, and exposure modeling where applicable. In goods where a palm oil or palm kernel oil derivative is used (i.e. as a stabilizer), we encourage the use of Roundtable on Sustainable Palm Oil



## **Product Safety and Quality Management Policy**

(RSPO) feedstock. Many consumer-facing companies that use our goods as packaging or components of their goods have implemented their RSL. In addition to meeting our own restriction requirements for raw materials, we also conform to customer specific RSL conditions. This combination of internal and external requirements allows us to meet the needs of our customers. Our RSL policy is publicly available on our website.

### Product Quality & Stewardship

We are committed to be a leader in providing high-quality products to our customers, through responsible sourcing and innovative design. Through our established quality management program, we set annual goals, monitor the product regulatory landscape, and respond to changing market dynamics. In addition, we maintain the highest possible standards of product stewardship to ensure the safe and responsible utilization of materials in enhancing the quality of life through design and development.

As part of our ambition for continuous improvement in all aspects of product development, we encourage our facilities to participate in global quality system standards and achieve third party certifications. This includes, but is not limited to, ISO 9001:2015, ISO 15378:2017, FSSC 22000, SQF (Safe Quality Foods), BRC (British Retail Consortium) and ISCC+ (International Sustainability and Carbon Certification).