



Global Human Rights Policy

Purpose

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

Scope

This policy applies to all Berry locations and team members. We will strive to ensure that our suppliers and business partners also adhere to the ethical standards outlined in this policy and according to our Supplier Code of Conduct.

Policy

Berry is committed to conduct business in a manner that demonstrates respect for internationally-recognized human rights and the dignity of all people. This policy is consistent with the [UN Guiding Principles on Business and Human Rights](#) and is informed by landmark documents, such as the [United Nations Declaration of Human Rights](#) (UDHR) and the [International Labour Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work](#).

Specifically, Berry operates its business with the following commitments:

- Respecting the Dignity of All People
 - Berry believes in creating a culture where everyone feels welcome. This begins with treating one another with dignity and respecting the diverse backgrounds that make us who we are. This is our 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, verbal abuse, or any form of retaliation.
 - 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).



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- Rights of Women
 - Berry respects the rights of all women. We follow the United Nations statement that “women’s rights are human rights.” This means women should live a life free from violence, slavery and discrimination, in addition to earning a fair and equal wage for equal work.
- Rights of Children
 - Berry does not allow child labor in its operations. We also believe children throughout our value chain should not be forced or coerced into trafficking, bonded labor or servitude. Typically, Berry does not hire anyone under the age of 18 unless apprenticeships or internships are permitted by local law.
- Rights of Indigenous Peoples
 - Berry respects the rights of indigenous peoples. We 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.
- Rights of LGBTQIA+ People
 - Berry recognizes the rights of the LGBTQIA+ community. This includes not only prohibiting any form of discrimination based on sexual orientation and gender identity, but respecting the inherent worth and dignity of all individuals in the community.
- Fair Compensation
 - Berry believes in fairly compensating its team members according to local markets. We comply with all 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.
- Safe & Secure 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, gender, sexual orientation, and abilities, amongst others. We will maintain a healthy, clean, safe and secure work environment and will not utilize mental or physical disciplinary practices.
- 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.



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- Freedom of Association and Collective Bargaining
 - Berry respects the freedom of association, including the right to join or not join a union. We will cooperate in good faith with the trade unions that represent our employees within the appropriate national legal frameworks.

Risk Management

We evaluate human rights risks associated with our operations in our annual enterprise risk assessment. We also monitor the political landscape, so if any issues arise, we are prepared to address them. Also, our suppliers undergo a human rights and labor standards assessment.

As part of our risk mitigation strategy, we provide human rights training to our team members. The training covers the identification of red flags associated with human rights violations and the importance of Speaking Up if such a situation arises. In regards to our business partners, we join efforts to build a responsible supply chain.

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, the Ethics & Compliance Team (compliance@berryglobal.com) or Legal, if you have any questions. We also have a confidential reporting Ethics Helpline to raise any concerns at <https://berryglobal.ethicspoint.com>. Berry prohibits any form of retaliation for reporting a concern in good faith.