

GRI INDEX 2020



Berry 2020 GRI Index

Supporting international efforts toward transparency and accountability, our Global Reporting Initiative (GRI) Index is a supplement to our 2020 Corporate Social Responsibility (CSR) report. This document references where to find information that has been publicly disclosed in other documents, as well as provides additional information that has not been disclosed elsewhere in accordance with the GRI Standards: Core option. Data is provided for all of our global operations for our 2020 Fiscal Year (September 29, 2019 - September 26, 2020), excluding joint ventures for which we do not have operational control, using calendar normalized data where appropriate.

General Disclosures

Disclosure	Description	Response or Reference
1. Organization Profile		
102-1	Name of the Organization	Berry Global Group, Inc. (BERY)
102-2	Activities, Brands, Products, and Services	Our activities, brands, products and services are outlined in our latest 10-K, and on our website. Form 10-K p. 3-5 “Segment Overview” Brands: http://www.berryglobal.com/our-brands
102-3	Location of Headquarters	Evansville, Indiana, USA
102-4	Location of Operations	Our locations are outlined in our latest 10-K, under properties. Form 10-K p. 9 “Properties”
102-5	Ownership and Legal Form	Berry Global is a publicly traded company (NYSE: BERY)
102-6	Markets Served	The markets we serve can be found in our latest 10-K, and on our website. Form 10-K p. 3 “General” http://www.berryglobal.com/markets
102-7	Scale of the Organization	Total Number of Employees: Approximately 47,000 Total Number of Facilities: 295 Net Sales: \$11.7 Billion Quantity of Products: 100,000+ SKUs
102-8	Information on Employees and Other Workers	

General Disclosures

Disclosure	Description	Response or Reference
1. Organization Profile (continued)		
102-9	Supply Chain	<p>Our most significant raw material is plastic resin. We also use additional materials, including butyl rubber, adhesives, paper and packaging materials, linerboard, rayon, polyester fiber, and foil. We source raw materials, equipment, and services for our global operations from suppliers around the world.</p> <p>We manage top suppliers by category through our BEST (Berry Exceptional Supplier Team) program, which formally documents supplier performance semi-annually. Executive management and commodity managers use this program to closely evaluate and improve supplier performance across each category.</p>
102-10	Significant Changes to the Organization and Its Supply Chain	<p>Significant changes to our organization are outlined in our most recent 10-K, under recent acquisitions and dispositions.</p> <p>Form 10-K p. 11-12</p>
102-11	Precautionary Principle or Approach	<p>The Audit Committee of the Board of Directors has oversight responsibility for risk assessment and risk management practices of the Company. Furthermore, both our Sustainability and Environmental policies were developed with the intent of proactively minimizing the impacts of our processes and products on the environment. This includes deselecting raw materials because of known or suspected concerns.</p> <p>Further information can be found in our committee charters, which can be found on the corporate governance page of our website.</p> <p>Audit Committee Charter Compensation Committee Charter Nominating and Governance Charter</p>
102-12	External Initiatives	<p>Operation Clean Sweep® Alliance to End Plastic Waste Association of Plastic Recyclers Recycling Demand Champions The UK Plastics Pact RECOUP Polyolefin Circular Economy Platform (PCEP)</p> <p>Corporate Renewable Energy Buyers' Principles Ellen MacArthur Foundation New Plastics Economy Global Commitment Science Based Targets Initiative Wrap Recycling Action Program (W.R.A.P.) Circular Economy for Flexible Packaging (CEFLEX) Circular Plastics Alliance</p>
102-13	Membership of Associations	<p>We are members of several organizations, including: Association of Plastic Recyclers (APR) Association of the Nonwoven Fabrics Industry (INDA) Plastic Recyclers Europe The Recycling Partnership Flexible Film Recycling Group (FFRG)</p> <p>Flexible Packaging Association (FPA) Foodservice Packaging Institute (FPI) Plastics Industry Association (PLASTICS) European Disposables and Nonwovens Association (EDANA)</p>
2. Strategy		
102-14	Statement from Senior Decision-Maker	CEO's Message
102-15	Key impacts, risks, and opportunities	<p>Key risks to our operations are outlined in our most recent 10-K, under risk factors.</p> <p>Form 10-K p. 6-8</p>

General Disclosures

Disclosure	Description	Response or Reference
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3. Ethics and Integrity

102-16	Values, Principles Standards and Norms of Behavior	<p>At Berry, we pride ourselves on our mission: always advancing to protect what's important. Through our values of partnerships, excellence, growth, and safety, we are able to help equip our customers for success in a fast-paced world. We are always advancing to improve the way we work, perfect our products and services, and enhance the communities in which we live and serve. The principle and standards we adhere to are outlined in our Code of Business Ethics, which is the cornerstone of our Ethics program, and is designed to support our mission, values, and behaviors. We also have a Supplemental Code of Ethics, applicable to our Chief Executive Officer, all Company directors, executive vice presidents, and regional presidents. We believe that the highest level of leaders at the Company have a responsibility to uphold the highest standards of integrity. Training statistics on business ethics are outlined in GRI 404.</p> <p>Code of Business Ethics Supplemental Code of Ethics</p>
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102-17	Mechanisms for advice and concerns about ethics	<p>We believe all team members should have an avenue to speak up if they don't feel comfortable talking with their manager or human resources. Our 24/7 Ethics Helpline is operated by a third-party provider, and it can be used to report a concern by phone or web. The Ethics Helpline is not only for team members, but any stakeholder, including our supply chain. The Helpline offers the reporter an opportunity to remain anonymous. In fact, they can communicate with our investigator anonymously throughout the process should the reporter want to share new information or the investigator have follow-up questions. We also have a zero tolerance policy for retaliating against anyone who speaks up in good faith.</p> <p>We concluded our final full year of having two primary helplines after the acquisition of RPC. Despite two helplines, we have a consistent robust investigative process that ensures each investigation is met with the thoroughness and sensitivity the matter warrants.</p>
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4. Governance

102-18	Governance Structure	<p>Our corporate governance structure is outlined on our website and in our proxy statement. We have three board committees - Audit, Nominating and Governance, and Compensation.</p> <p>The Board and its committees oversee the execution of our environmental, social, and governance strategies and initiatives as an integrated part of their oversight of our overall strategy and risk management. The Board is actively engaged with management on related topics, such as management of human capital, sustainability goals, analysis of alternative pathways to achieve those goals, customer, investor and other stakeholder expectations, and the environmental impact of our company.</p> <p>Berry Global Corporate Governance Proxy Statement Pages 3, 17</p>
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102-19	Delegating Authority	<p>Information on our process of delegation of authority can be found in our committee charters, which can be found on the corporate governance page of our website.</p> <p>Audit Committee Charter Compensation Committee Charter Nominating and Governance Charter</p>
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102-20	Executive-level responsibility for economic, environmental, and social topics	<p>The Chief Executive Officer, who is also Chairman of the Board, holds overall responsibility, along with the Board for corporate strategy governance, performance, internal controls, and risk management. It is the direct responsibility of the Chief Executive Officer and the other members of management to manage the enterprise on a day-to-day basis.</p>
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102-22	Composition of the highest governance body and its committees	Board Composition	
		Number	Percentage
		Male	70%
		Female	30%
		Under 55	10%
		56 - 65	80%
		Over 65	10%
		Underrepresented Minorities	20%
		Independent	90%

General Disclosures

102-23	Chair of the highest governance body	Details relating to the Chairperson of the Board are outlined in our latest Proxy Statement. Proxy Statement Pages 3,20
102-24	Nominating and selecting the highest governance body	Our director nomination process is outlined in our latest Proxy Statement. Proxy Statement Page 17
102-25	Conflict of interest	Our Code of Business Ethics applies to all Directors, Officers, and employees, including our Chief Executive Officer and senior financial officers. It outlines the duty of all employees to act without actual or apparent conflict of interest. We also have adopted a Certification and Supplemental Code of Ethics (the "Supplemental Code") applicable to our Chief Executive Officer, all company Directors, employees reporting directly to the Chief Executive Officer, Executive Vice Presidents, and Regional Presidents. More information is available in the ESG Appendix of our 2020 Impact Report, 2020 Impact Report Page 39 Proxy Statement Pages 3, 21 Code of Business Ethics Supplemental Code of Ethics
102-26	Role of the highest governance body in setting purpose, values, and strategy	As per our Corporate Governance Guidelines document on our website, the Board will review the Company's long-term strategic plans and the principal issues that the Company will face in the future during at least one Board meeting each year. Berry Global Corporate Governance Guidelines
102-27	Collective knowledge of the highest governance body	The collective knowledge of skills and experience of our Board is outlined in our latest Proxy Statement. Proxy Statement Page 18
102-28	Evaluating the highest governance body's performance	Details of our Board's annual performance evaluation can be found in our Corporate Governance Guidelines document on our website. Berry Global Corporate Governance Guidelines Page 8
102-30	Effectiveness of risk management processes	Our Audit Committee is appointed by the Board to serve as an independent and objective party to assist the Board in fulfilling its oversight responsibilities relating to the risk assessment and risk management practices of our Company. More information is available in the Audit Committee Charter, and the Board's role in risk oversight is also outlined in our latest Proxy Statement. Audit Committee Charter Proxy Statement Page 20
102-35	Remuneration Policies	Details on Director compensation, and the process of determining director compensation is outlined in our Corporate Governance Guidelines document on our website, and in our latest proxy statement. Berry Global Corporate Governance Guidelines Page 7 Proxy Statement Page 21
102-36	Process for determining remuneration	Details on Director compensation, and the process of determining director compensation is outlined in our Corporate Governance Guidelines document on our website, and in our latest proxy statement. Berry Global Corporate Governance Guidelines Page 7 Proxy Statement Page 21
102-37	Stakeholders' involvement in remuneration	Details on Director compensation, and the process of determining director compensation is outlined on in our Corporate Governance Guidelines document on our website, and in our latest proxy statement. Berry Global Corporate Governance Guidelines Page 7 Proxy Statement Page 21
102-38	Annual total compensation ratio	We have calculated our CEO pay ratio for the 2020 reporting year to be 290 times that of the median of the annual total compensation of all our employees, excluding the CEO. More information can be found in our latest proxy statement. Proxy Statement Page 35
102-39	Percentage increase in annual total compensation ratio	Our CEO pay ratio increased by 161% from the 2019 reporting period to the 2020 reporting period. In 2019, the CEO pay ratio was 111 times that of the median of the annual total compensation of all our employees, excluding the CEO, and this increased to 290 in 2020. Proxy Statement Page 35

5. Stakeholder Engagement

A sustainability assessment was performed in order to determine material aspects boundaries for all stakeholders in our long-term success. Below are the stakeholders considered in this assessment and how they are approached.

Internal Stakeholders

Our Employees: An Employee Sustainability Survey was previously sent to all employees, globally. The survey was translated into eight languages to cover the native language of all of our global operations at the time of the survey. Employees were asked to evaluate each aspect in terms of importance both to the long-term sustainability of our Company as well as to the employee, personally.

External Stakeholders

Our Customers: Our customers are one of our most critical stakeholders. We partner with them to ensure we are well-aligned, and to reduce the risk of not being able to comply with evolving requirements. It also positions us to gain additional knowledge share. We determine customer priorities in a variety of ways, including direct engagement, annual survey, monitoring public commitments, and tracking what our customers ask us about in their surveys.

Our Investors: We directly engage with a number of our investors on ESG. Their feedback has been consistent with overall industry trends around ESG. The majority of our investors look for us to report in alignment with industry frameworks, e.g. GRI, CDP, SASB, and TCFD. Many have also stressed the importance of improving our ESG ratings by broadening our reporting boundaries with further factors considered material for our industry as a whole.

Our Communities: The communities in which we operate are a critical stakeholder. Community engagement is encouraged at the corporate level and managed at the local level.

Our Suppliers: Our suppliers are important partners that are critical to our long-term success. As one of the largest converters in the plastics industry, we are proud to work closely with our suppliers to ensure alignment and mutually define materiality for the plastics industry.

Non-Governmental Organizations (NGOs): We closely track press releases from non-governmental organizations (NGOs). We are also fortunate to have numerous direct engagements. Incorporating their input is important for reducing potential risk.

Governments and Regulators: The products we produce are often regulated, and so we engage with political and regulatory stakeholders to ensure they better understand our business and industry when making regulatory decisions. We also participate in public policy discussions where necessary. We work with a wide range of organizations and trade associations to contribute to advancing our industry, and to stay informed on developments that could influence our business.

102-40

List of
Stakeholder Groups

102-41

Collective Bargaining
Agreements

	2018	2019	2020
Employee Coverage	18%	20%	20%

102-42

Identifying and Selecting
Stakeholders

Our list of stakeholders, and why they are considered, is outlined in disclosure 102-40.

102-43

Approach to Stakeholder
Engagement

Our list of stakeholders, and how they are approached, is outlined in disclosure 102-40.

102-44

Key Topics and
Concerns Raised

Our list of stakeholders are outlined in disclosure 102-40. As a result of stakeholder engagement, key material topics were chosen for our business, which are outlined in 102-47.

6. Reporting Practice

102-45	Entities included in the consolidated financial statements	This report covers all of our global operations for which we had operational control at the end of the reporting period, unless otherwise specified for specific indicators.
102-46	Defining report content and topic boundaries	As outlined in disclosure 102-40, a sustainability assessment was performed in order to determine material aspects boundaries for all stakeholders in our long-term success. This assessment helped gather insights that we used to guide our sustainability and Impact 2025 strategies, and outline the structure of our sustainability reporting. As a result of this assessment, we provided a list of topics that are most material to us, in disclosure 102-47.
102-47	List of material topics	<p>Economic: Economic performance, tax, and ethical business practices.</p> <p>Environmental: Litter and marine debris, energy, greenhouse gas emissions, waste, water, material use, supply chain management, and product lifecycle management.</p> <p>Social: Employee safety, regulatory compliance and product safety, employee training and education, opportunities for growth, community engagement, reporting of ethics violations, and human rights.</p>
102-48	Reinstatements of information	Historical data may be modified to reflect changes in business structure, as well as improvements in data collection and accuracy.
102-49	Changes in reporting	We have increased the number of disclosures to which we respond to improve the transparency of our reporting. We have also made some improvements in how we collect and report our data, and historical data in this document has been modified where possible to reflect that.
102-50	Reporting cycle	2020 Fiscal Year (September 29, 2019 - September 26, 2020), unless otherwise noted.
102-51	Date of most recent report	April 2020
102-52	Reporting cycle	Annual
102-53	Contact point for questions regarding the report	<p>Sustainability: Robert Flores</p> <p>Corporate Communications: Amy Waterman</p> <p>Investor Relations: Dustin Stilwell</p>
102-54	Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with the GRI Standards: Core option. We responded to many additional disclosures to further increase transparency.
102-55	GRI context index	This is a standalone GRI Content Index
102-56	External assurance	<p>This GRI Content Index has not currently been externally assured.</p> <p>We have received limited assurance by ERM CVS for Scope 1 and Scope 2 GHG emissions in relation to our 2021 CDP Climate Change Response. ERM CVS' assurance statement can be found in the appendix to our 2020 Impact Report.</p>

201 Economic Performance

Disclosure	Description	Response or Reference
GRI-103 Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Our management approach to business related topics can be found in the corporate governance section of our website. All relevant reporting can also be found in our latest Form 10-K . Berry Global Corporate Governance Guidelines
103-2	The management approach and its components	Our management approach to business related topics can be found in the corporate governance section of our website. All relevant reporting can also be found in our latest Form 10-K . Berry Global Corporate Governance Guidelines
103-3	Evaluation of the management approach	Our management approach to business related topics can be found in the corporate governance section of our website. All relevant reporting can also be found in our latest Form 10-K . Berry Global Corporate Governance Guidelines
GRI-201 Economic Performance 2016		
201-1	Direct economic value generated and distributed	Details on our direct economic performance can be found in our latest 10-K. Form 10-K p. 27-30, 47-48.
201-2	Financial implications and other risks and opportunities due to climate change	Details on our direct economic performance can be found in our latest 10-K. Form 10-K p. 9.
201-3	Defined benefit plan obligations and other retirement plans	Details on our direct economic performance can be found in our latest 10-K. Form 10-K p. 27-30, 43-45.

205 Anti-Corruption

Disclosure	Description	Response or Reference
GRI-103 Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Our anti-corruption management approach is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 39
103-2	The management approach and its components	Our anti-corruption management approach is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 39
103-3	Evaluation of the management approach	Our anti-corruption management approach is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 39

205 Anti-Corruption

Disclosure	Description	Response or Reference			
GRI-205 Anti-Corruption 2016					
205-1	Operations assessed for risks related to corruption	We leveraged an outside firm to conduct a full anti-bribery/anti-corruption risk assessment to meet France's anti-corruption law, Sapin II, requirement. The scope of this assessment included all operations in France, which accounts for 6% of operational facilities.			
205-2	Communication and training about anti-corruption policies and procedures	Compliance Training Topic	2020		
			Course completions	Completion Hours	Percentage of employee completions vs assigned
		Global Anti-corruption	1644	1136	92%
We perform regular compliance training on anti-corruption as part of our ethics and compliance program, as outlined above. We also have regular communication on anti-corruption, highlighted in our Code of Business Ethics, which is distributed to all employees, as outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 38, 39					
205-3	Confirmed incidents of corruption and action taken		2018	2019	2020
		Number of incidents	0	0	0
There have been no incidents of corruption involving our organization, our employees, or involving contracts with business partners in the reporting period.					

207 Tax

Disclosure	Description	Response or Reference
GRI-103 Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Our relevant management approach to tax can be downloaded from our website. Berry Global Other Disclosures
130-2	Communication and training about anti-corruption policies and procedures	Our relevant management approach to tax can be downloaded from our website. Berry Global Other Disclosures
103-3	Confirmed incidents of corruption and action taken	Our relevant management approach to tax can be downloaded from our website. Berry Global Other Disclosures
GRI-207 Tax 2016		
207-1	Approach to tax	Our approach to tax can be downloaded from our website. Berry Global Other Disclosures
207-2	Tax governance, control, and risk management	Our approach to tax can be downloaded from our website. Berry Global Other Disclosures
207-3	Stakeholder engagement and management concerns related to tax	Our approach to tax can be downloaded from our website. Berry Global Other Disclosures
207-4	Country-by-country reporting	Details on our tax reporting can be found in our 10-K. Form 10-K p. 41-43

301 Materials

Disclosure	Description	Response or Reference																								
GRI-103 Management Approach 2016																										
103-1	Explanation of the material topic and its boundary	Our management approach to the materials we use is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 37																								
103-2	The management approach and its components	Our management approach to the materials we use is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 37																								
103-3	Evaluation of the management approach	Our management approach to the materials we use is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 37																								
GRI-301 Materials 2016																										
301-1	Materials used by weight or volume	<p>Our primary raw material is plastic resin. Globally, we purchased roughly three million metric tons of resin in 2020, slightly down from 2019. Most of the resin we purchase is made from fossil fuels; however, we are increasing our use of circular plastics from recycled and renewable resources. It is critical that we decrease our use of virgin fossil fuels in order to transition to a circular, net-zero economy.</p> <p>We also track the percentage of renewable paper and Aluminum we source, which is outlined in the ESG Appendix of our 2020 Impact Report.</p>																								
301-2	Recycled input materials used	<table><tr><th></th><th>2018</th><th>2019</th><th>2020</th></tr><tr><td>Externally reprocessed PCR</td><td>0.5%</td><td>1.8%</td><td>1.8%</td></tr><tr><td>Internally reprocessed PCR</td><td><0.1%</td><td>0.4%</td><td>0.5%</td></tr><tr><td>Externally reprocessed PIR</td><td>0.8%</td><td>0.6%</td><td>0.7%</td></tr><tr><td>Internally reprocessed or diverted PIR</td><td>2.6%</td><td>2.9%</td><td>2.8%</td></tr><tr><td>Total Recycled Resin (PCR and PIR)</td><td>3.2%</td><td>5.7%</td><td>5.8%</td></tr></table> <p>Percentage is calculated as a percentage of total purchased resin</p> <p>We have internally defined post-consumer recycled resin (PCR) as material generated by households or companies in their end-user role, which can no longer be used for its intended purpose.</p> <p>We have internally defined post-industrial recycled resin (PIR) as material that is diverted from the waste stream during the manufacturing process, which never reaches the consumer. PIR does not include re-use of material that has not been modified in any way and is being used in the same process that generated it. Scrap that is fed directly back into the same manufacturing process that generated the scrap is not "recycled content." Scrap can only be classed as recycled content if it is re-pelletized or otherwise reprocessed prior to reuse, or used in a different manufacturing process for a different product.</p> <p>Additionally, a significant percentage of the paper we purchase is recycled, but we have not yet calculated that number at a company-wide level.</p>		2018	2019	2020	Externally reprocessed PCR	0.5%	1.8%	1.8%	Internally reprocessed PCR	<0.1%	0.4%	0.5%	Externally reprocessed PIR	0.8%	0.6%	0.7%	Internally reprocessed or diverted PIR	2.6%	2.9%	2.8%	Total Recycled Resin (PCR and PIR)	3.2%	5.7%	5.8%
	2018	2019	2020																							
Externally reprocessed PCR	0.5%	1.8%	1.8%																							
Internally reprocessed PCR	<0.1%	0.4%	0.5%																							
Externally reprocessed PIR	0.8%	0.6%	0.7%																							
Internally reprocessed or diverted PIR	2.6%	2.9%	2.8%																							
Total Recycled Resin (PCR and PIR)	3.2%	5.7%	5.8%																							

301 Materials

Disclosure	Description	Response or Reference
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GRI-103 Management Approach 2016

301-3

Reclaimed products and their packaging materials

At Berry, we do not track any direct reclaim of our products at a company-wide level. As outlined in the ESG Appendix of our 2020 Impact Report, 1% of our products are considered reusable and 84% of our products can be considered recyclable, and therefore have the potential to be diverted from end of life disposal.

However, the amount of our products that are ultimately diverted from end of life disposal also depends on the recycling access which guides recycling rates. Recycling access and rates varies by country. In some cases, the materials accepted for recycling even vary between adjacent municipalities. Although we sell our products across the global, we have reported on U.S. access and recycling rates below because this is both where we are headquartered as well as home to the greatest number of our manufacturing sites. The package types shown below are the primary products we manufacture that have recycling access. Recycling access for other products is minimal.

Package Type	U.S. Recycling Access
HDPE Bottles	92%
PET Bottles	92%
PP Bottles	81%
LDPE Bottles	80%
PVC Bottles	78%
Bottle Caps	76%
PE Film	72%
PP Tubs/Containers	70%
HDPE Non-Bottle Rigid	65%
PP Cups	61%
PS Containers	60%
PP and PE Lids	54%
PS Lids	45%
Plastic Buckets	43%
PP and PS Cutlery	5%
PE Tubes	1%

Resource Recycling Systems and Moore Recycling Associates, Inc. "2015-16 Centralized Study on Availability of Recycling". 2016

Moore Recycling Associates Inc. "Plastic Recycling Collection National Reach Study: 2012 Update". 2013

Moore Recycling Associates, Inc. "Plastic Film and Bag Recycling Collection: National Reach Study". 2012

Package Type	U.S. Recycling Rate
HDPE Bottles	29%
PET Bottles	29%
HDPE Containers	18%
LDPE/LLDPE Bags, Sacks, and Wrap	13%
PP Containers	8%

U.S. EPA. Advancing Sustainable Materials Management: 2018 Tables and Figures. 2020

The package types shown above are the only types for which U.S. recycling rate data is published by the U.S. EPA. In some cases, there may be meaningful recycling of product types not mentioned above, such as PP and PE lids. In most cases, recycling rates for package types not listed above are minimal.

Different package type categories are listed for the recycling rate data versus the recycling access data due to the fact that the data is from different sources which do not utilize the same terminology.

Although we do not consider it the reclaiming of our own products, at Berry we also have significant recycling operations of our own across the globe. In 2020 we recycled over 100,000 MT of post-consumer and post-industrial plastic within our recycling operations.

Disclosure	Description	Response or Reference
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GRI-103 Management Approach 2016

103-1	Explanation of the material topic and its boundary	Our energy management approach is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 26, 27
103-2	The management approach and its components	Our energy management approach is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 26, 27
103-3	Evaluation of the management approach	Our energy management approach is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 26, 27

GRI-302 Energy 2016

302-1	Energy consumption within the organization		Energy Consumption (MWh)			
			2018	2019	2020	% Total Energy (2020)
		Electricity	3,231,450	5,103,052	5,092,119	79%
		Natural Gas	1,033,594	1,267,318	1,257,540	20%
		Other	258,863	72,233	62,196	1%
	Total Energy	4,523,907	6,442,603	6,411,855	100%	
302-2	Energy consumption outside of the organization		2018	2019	2020	
		Renewable Energy Use (MWh)	0	27,886	165,799	
		Percent of Total Energy	0%	0.4%	2.6%	
We did not produce any energy for sale during the reporting period.						
Emission Factors and methodologies used, as well as any assumptions that were made, when calculating the above values, can be found in the energy management approach section in the ESG Appendix of our 2020 Impact Report.						
302-3	Energy Intensity		Energy Intensity (MWh / MT of product)			
			2018	2019	2020	
		Electricity	1.26	1.30	1.31	
		Natural Gas	0.40	0.32	0.32	
		Other	0.10	0.02	0.02	
		Total Energy	1.76	1.64	1.65	
After energy efficiency improvements in 2018 and 2019, energy intensity rose slightly in 2020 to 1.65MWh per MT of product. This is a result of the associated energy efficiencies of necessary temporary plant closures during the COVID-19 pandemic, coupled with the ongoing product light-weighting that negatively affects our efforts to reduce our intensity metric, since volume processed is our preferred denominator for intensity.						
Emission Factors and methodologies used, as well as any assumptions that were made, when calculating the above values, can be found in the energy management approach section in the ESG Appendix of our 2020 Impact Report.						

302 Energy

Disclosure	Description	Response or Reference
GRI-302 Energy 2016		
302-4	Reduction of energy consumption	<p>As outlined in 302-1, we recorded an absolute reduction of 30,748 MWh across all energy sources since 2019, which was our first full year of reporting that included the large RPC acquisition. Our energy usage is mainly impacted by production outputs, as well as energy reduction and efficiency projects.</p> <p>As a result of the COVID-19 pandemic, our production volume fell slightly, and will have been the main cause of this reduction in energy. However, improvements in energy reduction are also driven through our Berry Unplugged program. Through this program, we regularly share best practices to help sites reduce energy. Our sites implement hundreds of energy reduction project every year, ranging from simple lighting projects to significant capital investments to purchase newer, more efficient equipment."</p> <p>Emission factors and methodologies used, as well as any assumptions that were made, when calculating the above values, can be found in the energy management approach section in the ESG Appendix of our 2020 Impact Report.</p>
302-5	Reductions in energy requirements of products and services	<p>As outlined in 302-3, overall energy intensity, across all energy sources, rose by 0.01MWh per MT produced since 2019. This is a result of the associated energy efficiencies of necessary temporary plant closures during the COVID-19 pandemic, coupled with the ongoing product light-weighting that negatively affects our efforts to reduce our intensity metric, since volume processed is our preferred denominator for intensity.</p> <p>Emission factors and methodologies used, as well as any assumptions that were made, when calculating the above values, can be found in the energy management approach section in the ESG Appendix of our 2020 Impact Report.</p>

303 Water and Effluents

Disclosure	Description	Response or Reference
GRI-103 Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Our management approach to water and effluents is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 30
103-2	The management approach and its components	Our management approach to water and effluents is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 30
103-3	Evaluation of the management approach	Our management approach to water and effluents is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 30
GRI-303 Water and Effluents 2018		
303-1	Interactions with water as a shared resource	<p>For the majority of our sites, we primarily withdraw water for cooling during the manufacturing process. Some of our sites also withdraw water for other processes, such as hydroentanglement of nonwoven fibers, and these sites typically withdraw water in larger quantities. The water withdrawn by site is then discharged through third-party sources, or as surface water. The majority of the water we consume is lost through evaporation, with the remaining being consumed by employees.</p> <p>We use the WRI Aqueduct Water Risk Atlas to analyze potential water-related impacts on our operations. This, and our approach to water management is outlined in the ESG Appendix of our 2020 Impact Report, and can also be found in our latest response to the Water Security CDP questionnaire.</p> <p>2020 Impact Report Page 30 Water Security CDP</p>
303-2	Management of water discharge-related impacts	Excluding our Consumer Packaging International division, all our sites measure and report discharge type, quality, including temperature, for all their monthly water discharges. In order to discharge water to municipal systems or surface water, sites must comply with local regulatory requirements to ensure proper water quality. Water discharge quality is monitored and abnormal figures are investigated.

303 Water and Effluents

Disclosure	Description	Response or Reference
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GRI-303 Water and Effluents 2018

	2018		2019		2020	
	Amount (m³)	% of total	Amount (m³)	% of total	Amount (m³)	% of total
Surface water	810	<1%	4,033	<1%	1,699	<1%
Ground water	921,386	16%	1,084,734	14%	1,081,933	15%
Third-party water	4,815,406	84%	6,492,224	86%	6,357,131	85%
Total	5,737,602	100%	7,580,991	100%	7,440,763	100%
Total Withdrawal Intensity	2.23	-	1.93	-	1.92	-

303-3 Water Withdrawal

	2018		2019		2020	
	Amount (m³)	% of total	Amount (m³)	% of total	Amount (m³)	% of total
Areas with water stress	Not calculated	N/A	1,247,495	16%	1,354,727	18%
All areas	5,737,602	100%	7,580,991	100%	7,440,763	100%

Withdrawals from areas with water stress are determined using the WRI Aqueduct Water Risk Atlas based on areas having high or very high baseline water stress.

All the water we withdraw is freshwater. High quality freshwater is important because increased contaminants and deposits would require increased maintenance costs. Further information can be found in our latest response to the Water Security CDP questionnaire.

Methodologies used, as well as any assumptions, when calculating the above values, can be found in the water management approach section in the ESG Appendix of our 2020 Impact Report.

[Water Security CDP](#)

303 Water and Effluents

Disclosure	Description	Response or Reference
GRI-303 Water and Effluents 2018		

	2018		2019		2020	
	Amount (m³)	% of total	Amount (m³)	% of total	Amount (m³)	% of total
Third-party (Sewer/Treatment)	2,464,122	88%	2,495,583	67%	2,531,606	67%
Surface water discharge	331,335	12%	1,211,886	33%	1,228,767	33%
Total	2,795,457	100%	3,707,469	100%	3,760,373	100%

*Our Consumer Packaging International Division does not currently track these metrics and is excluded from the data.

Sites measure and report discharge type, quality, including temperature, for all their monthly water discharges. Water quality for all of sites' discharge methods are monitored and abnormal figures are investigated. We do not currently report a company-wide figure for the type of water discharge.

303-4

Water Discharge

	2018		2019		2020	
	Amount (m³)	% of total	Amount (m³)	% of total	Amount (m³)	% of total
Areas with water stress	Not calculated	N/A	750,193	20%	834,070	22%
All areas	2,795,457	100%	3,707,469	100%	3,760,373	100%

*Our Consumer Packaging International Division does not currently track these metrics and is excluded from the data.

	Water Related Non-compliance		
	2018	2019	2020
Number of Incidents	0	0	0

There been no incidents relating to water-discharge non-compliance in the last three years. Excluding our Consumer Packaging International Division, all our sites measure and report discharge type, quality, including temperature, for all their monthly water discharges. Water quality for all of sites' discharge methods are monitored and abnormal figures are investigated.

Methodologies used, as well as any assumptions, when calculating the above values, can be found in the water management approach section in the ESG Appendix of our 2020 Impact Report.

303 Water and Effluents

Disclosure	Description	Response or Reference						
GRI-303 Water and Effluents 2018								
303-5	Water Consumption		2018		2019		2020	
			Amount (m³)	% of total	Amount (m³)	% of total	Amount (m³)	% of total
		Areas with water stress	Not calculated	N/A	405,096	17%	350,130	16%
		All areas	2,079,621	100%	2,413,019	100%	2,184,201	100%
		*Our Consumer Packaging International Division does not currently track these metrics and is excluded from the data.						
The majority of our water consumption is water that is lost through evaporation during the manufacturing process, with a small amount being consumed by our employees. Due to the closed-loop nature of water use for cooling at a number of our sites, water withdrawals can remain on site for an extended period before being discharged. Therefore, there may be some water storage included in our yearly consumption number, but this is not individually tracked at a company-wide level.								
Methodologies used, as well as any assumptions, when calculating the above values, can be found in the water management approach section in the ESG Appendix of our 2020 Impact Report.								

305 Emissions

Disclosure	Description	Response or Reference
GRI-103 Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Our management approach to our emissions is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 30
103-2	The management approach and its components	Our management approach to our emissions is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 30
103-3	Evaluation of the management approach	Our management approach to our emissions is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 30
GRI-305 Emissions 2016		
305-1	Direct (Scope 1) GHG Emissions	

305 Emissions

Disclosure	Description	Response or Reference
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GRI-305 Emissions 2016

305-2

Energy indirect (Scope 2)
GHG Emissions

	Location-Based Emissions					
	2018 (CO ₂ e)	2019 (CO ₂ e)	2020 (CO ₂ e)	2020 (CO ₂)	2020 (CH ₄)	2020 (N ₂ O)
Scope 2 Emissions (Metric Tons)	1,440,455	2,191,439	2,081,658	2,070,043	862	3,737
	Market-Based Emissions					
	2018 (CO ₂ e)	2019 (CO ₂ e)	2020 (CO ₂ e)	2020 (CO ₂)	2020 (CH ₄)	2020 (N ₂ O)
Scope 2 Emissions (Metric Tons)	1,440,455	2,180,333	1,993,699	1,982,575	826	3,579

Emission factors and methodologies used, as well as any assumptions that were made when calculating the above values, can be found in the Greenhouse gas emissions management approach section of our ESG Appendix.

305-3

Other indirect (Scope 3)
GHG Emissions

	2018 (CO ₂ e)	2019 (CO ₂ e)	2020 (CO ₂ e)
Scope 3 Emissions	5,492,400	9,341,754	8,693,438

Emission factors and methodologies used, as well as any assumptions that were made when calculating the above values, can be found in the Greenhouse gas emissions management approach section in the ESG Appendix of our 2020 Impact Report. A full breakdown of our Scope 3 emissions can be found in our CDP climate change questionnaire responses, including the method used to estimate the GHG emissions for each source with details on our 2020 reporting year, will be available in the 2021 CDP submission.

[Climate Change CDP](#)

305-4

GHG Emissions Intensity

	Market-Based Emissions					
	2018 (CO ₂ e)	2019 (CO ₂ e)	2020 (CO ₂ e)	2020 (CO ₂)	2020 (CH ₄)	2020 (N ₂ O)
Scope 1 Emissions (Metric Tons)	237,071	260,954	265,426	264,608	6	2
Scope 2 Emissions (Metric Tons)	1,440,455	2,180,333	1,993,699	1,982,575	826	3,579
Scope 1+2 Emissions (Metric Tons)	1,677,526	2,441,287	2,259,125	2,247,183	832	3,581
Total Emissions Intensity (Metric Tons Emissions per Metric Ton Produced)	0.652	0.622	0.581	0.580	0.000	0.001

Emission factors and methodologies used, as well as any assumptions that were made when calculating the above values, can be found in the Greenhouse gas emissions management approach section in the ESG Appendix of our 2020 Impact Report.

305 Emissions

Disclosure	Description	Response or Reference
GRI-305 Emissions 2016		
305-5	Reduction of GHG Emissions	<p>As outlined in 305-1, 305-2, and 305-4, using a market-based methodology, we recorded an absolute reduction of 182,162 metric tons of CO₂e from Scope 1 and Scope 2 sources, from 2019 - which was our first full year of reporting that included the large RPC acquisition. Our emissions are mainly impacted by production outputs, and energy reduction and efficiency projects, as well as the purchase of renewable energy.</p> <p>As a result of the COVID-19 pandemic, our production volume fell slightly, and was the cause of this reduction in emissions. However, improvements in energy reduction are also driven through our Berry Unplugged program. Through this program, we regularly share best practices to help sites reduce energy. Our sites implement hundreds of energy reduction projects every year, ranging from simple lighting projects to significant capital investments to purchasing newer, more efficient equipment. As well as energy reduction, our emissions fell due to the increased purchases of renewable energy, and also due to the continued greening of eGrid emission factors.</p> <p>Emission factors and methodologies used, as well as any assumptions that were made when calculating the above values, can be found in the Greenhouse gas emissions management approach section in the ESG Appendix of our 2020 Impact Report.</p>
305-6	Emissions of ozone-depleting substances (ODS)	<p>Refrigerants, and other Ozone Depleting Substances are regulated as hazardous materials by the US EPA due to their ozone depleting ability and powerful greenhouse gas potential. Sites monitor the release of refrigerants and other ODS, and calculations are done at the site level and tracked. Previous internal investigations have shown that our emissions of ODS are insignificant, and thus, it would not be practical to report an exact company-wide number, considering the resources required to measure and calculate. More information can be found in the air quality management approach section in the ESG Appendix of our 2020 Impact Report.</p>
305-7	Nitrogen Oxides (NOX), sulfur oxides (SOX), and other significant air emissions	<p>Emissions of CO₂, CH₄ and N₂O can be found in the greenhouse gas emissions section.</p> <p>Other air emissions, such as NOx, SOx and VOCs are tracked at site level in line with local air permits, where the limit is established and monitored by the site.</p> <p>Previous internal investigations have shown that these emissions are de minimis. More information can be found in the air quality management approach section in the ESG Appendix of our 2020 Impact Report.</p>

306 Waste

Disclosure	Description	Response or Reference
GRI-103 Management Approach 2016		
103-1	Explanation of the material topic and its boundary	<p>Our waste management approach is outlined in the ESG Appendix of our 2020 Impact Report.</p> <p>2020 Impact Report Page 29, 30</p>
103-2	The management approach and its components	<p>Our waste management approach is outlined in the ESG Appendix of our 2020 Impact Report.</p> <p>2020 Impact Report Page 29, 30</p>
103-3	Evaluation of the management approach	<p>Our waste management approach is outlined in the ESG Appendix of our 2020 Impact Report.</p> <p>2020 Impact Report Page 29, 30</p>

306 Waste

Disclosure	Description	Response or Reference																												
GRI-306 Waste 2020																														
306-1	Waste generation and significant waste-related impacts	The majority of the waste generated at our sites is plastic manufacturing scrap, which is either recycled on-site, or sent to other sites for reprocessing. This output is not included in our data; our waste management efforts focus on the remaining waste streams, including designing our products for circularity, and reducing waste disposal at landfill, as per our management approach.																												
306-2	Management of significant waste-related impacts	All sites are encouraged to progress towards achieving Zero Waste-to-Landfill certifications by working with local waste management experts, and as well as the controlled disposal of waste, our sites have systems in place to prevent the escape of resin through spillages. We are part of the Operation Clean Sweep® (OCS) initiative, which is a commitment to strive toward zero resin pellet, powder, and flake loss. As part of our commitment to OCS, we regularly communicate the importance of preventing resin loss to all of our sites, perform internal audits and training, install new infrastructure, and OCS best practice. Furthermore, we hold our resin suppliers accountable for implementing OCS in their facilities.																												
306-3	Waste generated	<table><tr><th></th><th>2018</th><th>% of total</th><th>2019*</th><th>% of total</th><th>2020*</th><th>% of total</th></tr><tr><td>Non-hazardous Waste</td><td>120,026</td><td>95%</td><td>98,331</td><td>92%</td><td>87,901</td><td>91%</td></tr><tr><td>Hazardous Waste</td><td>5,703</td><td>5%</td><td>8,237</td><td>8%</td><td>8,636</td><td>9%</td></tr><tr><td>Total</td><td>125,729</td><td>100%</td><td>106,568</td><td>100%</td><td>96,537</td><td>100%</td></tr></table> <p>*Our Consumer Packaging International Division does not currently track these metrics and is excluded from the data.</p> <p>Waste data is managed at site level, using purchasing records and utility invoices. Company-wide data is compiled as part of our EH&S vision.</p>		2018	% of total	2019*	% of total	2020*	% of total	Non-hazardous Waste	120,026	95%	98,331	92%	87,901	91%	Hazardous Waste	5,703	5%	8,237	8%	8,636	9%	Total	125,729	100%	106,568	100%	96,537	100%
	2018	% of total	2019*	% of total	2020*	% of total																								
Non-hazardous Waste	120,026	95%	98,331	92%	87,901	91%																								
Hazardous Waste	5,703	5%	8,237	8%	8,636	9%																								
Total	125,729	100%	106,568	100%	96,537	100%																								

306 Waste

Disclosure	Description	Response or Reference
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GRI-306 Waste 2020

306-4

Waste diverted from disposal

	2018		2019*		2020*	
Non-hazardous Waste	Amount	% of total	Amount	% of total	Amount	% of total
Total Diverted	90,248	100%	69,812	100%	53,128	100%
Reuse	Not measured	N/A	Not measured	N/A	Not measured	N/A
Recycling	90,248	100%	69,812	100%	53,128	100%
Other	0	0%	0	0%	0	0%
Hazardous Waste	Amount	% of total	Amount	% of total	Amount	% of total
Total Diverted	3,544	100%	6,631	100%	6,841	100%
Reuse	Not measured	N/A	Not measured	N/A	Not measured	N/A
Recycling	2,204	62%	2,836	43%	3,000	44%
Other	1,340	38%	3,795	57%	3,841	56%
Total Waste	Amount	% of total	Amount	% of total	Amount	% of total
Total Diverted	93,792	100%	76,443	100%	59,969	100%
Reuse	Not measured	N/A	Not measured	N/A	Not measured	N/A
Recycling	92,452	99%	72,648	95%	56,128	94%
Other	1,340	1%	3,795	5%	3,841	6%

*Our Consumer Packaging International Division does not currently track these metrics and is excluded from the data.

Waste management strategies are handled at site level. Therefore, we do not have this level on granularity on the waste management process at company-wide level.

Waste data is managed at site level, using purchasing record and utility invoices. Company-wide data is compiled as part of our EH&S vision.

306 Waste

Disclosure	Description	Response or Reference
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GRI-306 Waste 2020

306-5

Waste directed to disposal

	2018		2019*		2020*	
Non-hazardous Waste	Amount	% of total	Amount	% of total	Amount	% of total
Total Disposed	29,778	100%	28,519	100%	34,773	100%
Incineration	200	1%	158	1%	1,954	6%
Energy Recovery	3,166	11%	3,165	11%	6,989	20%
Landfill	22,586	76%	21,710	76%	22,452	65%
Other	3,826	13%	3,486	12%	3,378	10%
Hazardous Waste	Amount	% of total	Amount	% of total	Amount	% of total
Total Disposed	2,159	100%	1,606	100%	1,795	100%
Incineration	85	4%	216	13%	186	10%
Energy Recovery	1,483	69%	759	47%	881	49%
Landfill	591	27%	631	39%	728	41%
Other	0	0%	0	0%	0	0%
Total Waste	Amount	% of total	Amount	% of total	Amount	% of total
Total Disposed	31,937	100%	30,125	100%	36,568	100%
Incineration	1,540	5%	374	1%	2,140	6%
Energy Recovery	3,166	10%	3,924	13%	7,870	22%
Landfill	22,586	71%	22,341	74%	23,180	63%
Other	3,826	12%	3,486	12%	3,378	9%

*Our Consumer Packaging International Division does not currently track these metrics and is excluded from the data.

Waste management strategies are handled at site level. Therefore, we do not have this level on granularity on the waste management process at company-wide level.

Waste data is managed at site level, using purchasing records and utility invoices. Company-wide data is compiled as part of our EH&S vision.

307 Environmental Compliance

Disclosure	Description	Response or Reference
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GRI-103 Management Approach 2016

103-1	Explanation of the material topic and its boundary	Our management approach to environmental compliance is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 31
103-2	The management approach and its components	Our management approach to environmental compliance is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 31
103-3	Evaluation of the management approach	Our management approach to environmental compliance is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 31

GRI-307 Environmental Compliance 2016

307-1	Non-compliance with environmental laws and regulations		2018	2019	2020
		Non-compliance incidents	0	0	0

There have been no significant environmental incidents of non-compliance in at least the last three years.

308 Supplier Environmental Assessment

Disclosure	Description	Response or Reference
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GRI-103 Management Approach 2016

103-1	Explanation of the material topic and its boundary	Our management approach to supplier engagement and environmental and social assessment, is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 38
103-2	The management approach and its components	Our management approach to supplier engagement and environmental and social assessment, is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 38
103-3	Evaluation of the management approach	Our management approach to supplier engagement and environmental and social assessment, is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 38

GRI-308 Supplier Environmental Assessment 2016

308-1	New suppliers that were screened using environmental criteria	New suppliers are screened for compliance with our Supplier Code of Conduct. Key suppliers are also required to recertify compliance annually. We are in the process of implementing a new system that would allow us to perform social and environmental supplier assessments on all active vendors annually. Supplier expectations are specified in our Purchase Order Standard Terms and Conditions. Berry Global Purchase Order Standard Terms and Conditions
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401 Employment

Disclosure	Description	Response or Reference
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GRI-103 Management Approach 2016

103-1	Explanation of the material topic and its boundary	Our management approach to our employees is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 32
103-2	The management approach and its components	Our management approach to our employees is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 32
103-3	Evaluation of the management approach	Our management approach to our employees is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 32

GRI-401 Employment 2016

401-1	New employee hires and employee turnover	Total employee hires by region, and percentage (%) split by type	2018		2019*		2020*	
			Male	Female	Male	Female	Male	Female
		Global						
		Number	4,799	1,929	5,232	2,214	2,129	2,129
		Percentage	71%	29%	70%	30%	28%	28%
		North America						
		Number	4,251	1,708	4,635	2,009	1,962	1,962
		Percentage	71%	29%	70%	30%	29%	29%
		South America						
		Number	83	24	115	45	53	53
		Percentage	78%	22%	72%	28%	22%	22%
		EMEIA						
		Number	247	32	209	46	40	40
		Percentage	89%	11%	82%	18%	14%	14%
		Asia						
		Number	218	165	273	114	74	74
		Percentage	57%	43%	71%	29%	34%	34%

*Excludes International locations acquired as part of July 2019 acquisition of RPC Group

We do not currently collect a company-wide number for employee turnover.

401-2	Benefits provided to full-time employees that are not provided to temporary employees	We have a long history of profit sharing with our employees. Embedded in our culture, this philosophy is one of many practices that have enabled us to continuously focus on growth, improvement, and success. Excluding the acquisition of RPC Group—more than 20,000, or 84% of our 24,000 hourly and salaried employees— participate in variable incentive pay programs each year.
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403 Occupational Health and Safety

Disclosure	Description	Response or Reference
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GRI-103 Management Approach 2016

103-1	Explanation of the material topic and its boundary	Our management approach to occupational health and safety is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 34
103-2	The management approach and its components	Our management approach to occupational health and safety is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 34
103-3	Evaluation of the management approach	Our management approach to occupational health and safety is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 34

GRI-403 Occupational Health and Safety

403-1	Benefits provided to full-time employees that are not provided to temporary employees	We have implemented a global, integrated EHS Management System that drives continuous improvement as part of our EHS vision.
403-2	Hazard identification, risk assessment, and incident investigation	Our risk management is driven by accurate identification and robust mitigation of hazards.

All our employees are trained in following all prescribed work practices and procedures to perform their function safely and effectively. Additionally, safety absolutes are covered as part of our compliance training. In addition to the Compliance training below, over 30,000 eLearning courses on safety were completed in 2020.

403-5	Worker training on occupational health and safety	Training Topic	2020		
			Course completions	Completion hours	Percentage of employee completions vs assigned
		Safety Absolutes	15,753	4577	92%

403-9	Work-related injuries		2016	2017	2018	2019	2020
		Lost-time rate	0.26	0.44	0.41	0.42	0.39
		Total recordable incident rate	1.46	1.26	1.19	1.17	1.04
		Severity rate	8.91	10.84	11.55	12.23	12.65
		Work-related fatalities	0	1	0	1	1
		Fatality rate	-	0.0036	-	0.0031	0.0022

We do not currently track high-consequence injury rate at a company-wide level.

Through our safety policy and EHS vision we are working towards the goal of zero incidents of any type, and this is reflected in our key KPIs, lost-time rate and recordable incident rate, sitting well below the industry average. The actions we take to eliminate hazards and minimize the risk of incidents occurring are outlined in the ESG Appendix of our 2020 Impact Report.

403 Occupational Health and Safety

Disclosure	Description	Response or Reference					
GRI-403 Occupational Health and Safety							
403-10	Work-related ill health	We currently do not track the number of cases of recordable work-related ill health at a company-wide level. There have been no fatalities as a result of work-related ill health.					
			2016	2017	2018	2019	2020
		Number of fatalities as a result of work-related ill health	0	0	0	0	0

404 Training and Education

Disclosure	Description	Response or Reference
GRI-103 Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Our management approach to training and education is outlined in the governance and training section in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 38
103-2	The management approach and its components	Our management approach to training and education is outlined in the governance and training section in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 38
103-3	Evaluation of the management approach	Our management approach to training and education is outlined in the governance and training section in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 38
GRI-404 Training and Education 2016		

404-1	Average hours of training per year per employee	Training Topic	2020		
			Course completions	Completion hours	Percentage of employee completions vs assigned
		Active Shooter 2.0	14,951	5,554	87%
		Antitrust Essentials	354	353	85%
		Avoiding Insider Trading	253	117	90%
		Berry Global Code of Business Ethics	19,767	8,066	92%
		CA Transparency in Supply Chain Act	420	138	>99%
		Cybersecurity	4,447	1,943	100%
		Global Anti-corruption	1,644	1,136	92%
		Safety Absolutes	157,53	4,577	92%
		Sexual Harassment	15,325	7,735	90%

As part of our non-compliance training, an additional 18,175 online courses were completed across 4,833 hours by 3,132 participants, and there were 2,714 completions of in-person training (ILT) across 2,602 hours by 788 participants. 30,704 eLearning courses on training were completed, as well as 11,237 courses on self development.

404 Training and Education

Disclosure	Description	Response or Reference								
GRI-404 Training and Education 2016										
404-2	Programs for upgrading employee skills and transition assistance programs	<p>We are committed to developing our team members from shop floor to executive level with both in-person and eLearning development programs. Programs include leadership and skill building to drive internal promotability and career development. We also conduct deep dive succession planning calibration sessions, reviewing more than 1,200 employees on an annual basis. Sessions are followed with 12-month individual development plans for each leader reviewed.</p> <p>Below is an outline of a number of these programs, and many are also outlined on our website on the employee development page.</p> <p>Leadership Foundations: front-line supervisor and individuals with the potential and desire to become supervisors. Twenty manager skill courses that are taught at local level by HR and Plant leaders. Each 1.5 hour course covers basic leadership concepts and tools needed for success in the supervisory role (examples include: problem solving, interview skills, providing feedback, etc.).</p> <p>Leadership Development Program (heritage Berry): three day instructor-led leadership competency workshop delivered 2-3 times per year in all of our primary geographies (including US, Mexico, South America, Europe and Asia) for Manager and Director-band employees. Course includes Situational Leadership, Building Trust, MBTI, Leading Change and interactions with senior leaders.</p> <p>Operations Development Program: Program to develop new to Berry Plant Directors and internal successors to the Plant Director role. Focus is on leading team, driving engagement, financial acumen, safety, quality, and sustainability.</p> <p>Berry Global Employee Development</p>								
404-3	Percentage of employees receiving regular performance and career development reviews	<p>As outlined in 404-2, we are committed to developing the careers of our employees. We perform regular reviews with our employees on performance and development to ensure each team member has the opportunity to grow their skills and career.</p> <table><tr><th></th><th>2018</th><th>2019</th><th>2020</th></tr><tr><td>Percentage of Salaried Employees</td><td>99%</td><td>99%</td><td>99%</td></tr></table> <p>Excludes International locations acquired as part of July 2019 acquisition of RPC Group</p>		2018	2019	2020	Percentage of Salaried Employees	99%	99%	99%
	2018	2019	2020							
Percentage of Salaried Employees	99%	99%	99%							

405 Diversity and Equal Opportunity

Disclosure	Description	Response or Reference
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GRI-103 Management Approach 2016

103-1	Explanation of the material topic and its boundary	Our approach to diversity and equal opportunity is included within our management approach to human rights, outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33
103-2	The management approach and its components	Our approach to diversity and equal opportunity is included within our management approach to human rights, outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33
103-3	Evaluation of the management approach	Our approach to diversity and equal opportunity is included within our management approach to human rights, outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33

GRI-405 Diversity and Equal Opportunity 2016

	Board Diversity in 2020	
	Number	Percentage
Male	7	70%
Female	3	30%
Under 55	1	10%
56 - 65	8	80%
Over 65	1	10%
Underrepresented Minorities	2	20%

405-1	Diversity of governance bodies and employees		Management Diversity		
			2018	2019*	2020*
		Male Employees			
		Number	1292	1320	1356
		Percentage	76%	75%	74%
		Female Employees			
		Number	412	432	472
		Percentage	24%	25%	26%

*Excludes International locations acquired as part of July 2019 acquisition of RPC Group

	Total Employee Diversity		
	2018	2019	2020
Male Employees			
Number	17,497	33,954	33,755
Percentage	73%	71%	71%
Female Employees			
Number	6,476	13,968	13,641
Percentage	27%	29%	29%

406 Non-discrimination

Disclosure	Description	Response or Reference												
GRI-103 Management Approach 2016														
103-1	Explanation of the material topic and its boundary	Our approach to non-discrimination is included within our management approach to human rights, outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33												
103-2	The management approach and its components	Our approach to non-discrimination is included within our management approach to human rights, outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33												
103-3	Evaluation of the management approach	Our approach to non-discrimination is included within our management approach to human rights, outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33												
GRI-406 Non-discrimination 2016														
406-1	Incidents of discrimination and corrective actions taken	<p>We believe all team members should have an avenue to speak up about incidents of discrimination, even if they don't feel comfortable talking with their manager or human resources. Our mechanisms for advice and concerns about ethics are outlined in GRI disclosure 102-17.</p> <p>Below is a summary of the reports received through these mechanisms. We are extremely proud of our days-to-close rate as it provides team members with confidence in the process.</p> <table><tr><th colspan="4">24/7 Ethics Helpline Data</th></tr><tr><th>Reports Received</th><th>Anonymous Rate</th><th>Average Days to Close</th><th>Substantiation Rate</th></tr><tr><td>246</td><td>73%</td><td>22</td><td>11%</td></tr></table>	24/7 Ethics Helpline Data				Reports Received	Anonymous Rate	Average Days to Close	Substantiation Rate	246	73%	22	11%
24/7 Ethics Helpline Data														
Reports Received	Anonymous Rate	Average Days to Close	Substantiation Rate											
246	73%	22	11%											

407 Freedom of Association and Collective Bargaining

Disclosure	Description	Response or Reference
GRI-103 Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Our approach to the freedom of association and collective bargaining is included within our management approach to human rights, outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33
103-2	The management approach and its components	Our approach to the freedom of association and collective bargaining is included within our management approach to human rights, outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33
103-3	Evaluation of the management approach	Our approach to the freedom of association and collective bargaining is included within our management approach to human rights, outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33
GRI-407 Freedom of Association and Collective Bargaining 2016		
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	<p>Employees' rights to freedom of association or collective bargaining are not violated at any of operations, and we do not consider there to be any significant risk of violation. Similarly, we do not consider there to currently be any risk of violation in our supply chain, and at Berry, we will strive to ensure that our suppliers and business partners adhere to the standards that are outlined within our Global Human Rights and Labor Standards Policy. The percentage of employees currently covered by collective bargaining agreements is outlined in 102-41.</p> <p>As outlined in our Global Human Rights and Labor Standards Policy, and in the Human Rights section in the ESG Appendix of our 2020 Impact Report, at Berry we respect the freedom of association. We will cooperate in good faith with the trade unions that represent our employees within the appropriate national legal frameworks.</p>

408 Child Labor

Disclosure	Description	Response or Reference
GRI-103 Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Our approach to child labor is included within our management approach to human rights, outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33
103-2	The management approach and its components	Our approach to child labor is included within our management approach to human rights, outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33
103-3	Evaluation of the management approach	Our approach to child labor is included within our management approach to human rights, outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33
GRI-408 Child Labor 2016		
408-1	Operations and suppliers at significant risk for incidents of child labor	We have no operations or suppliers that we consider to have significant risk of child labor or young workers exposed to hazardous work. As outlined in our Global Human Rights and Labor Standards Policy, and in the Human Rights section of our ESG Appendix, at Berry, we do not allow child labor in our operations. We also believe children should not be forced or coerced into trafficking, bonded labor, or servitude. Typically, we do not hire anyone under the age of eighteen unless apprenticeships or internships are permitted by local law. We don't believe there are human rights or modern slavery issues in our supply chain, yet we created our Global Human Rights and Labor Standards Policy and provide training on modern slavery to ensure all team members understand the risks and our responsibility in addressing it.

409 Forced or Compulsory Labor

Disclosure	Description	Response or Reference
GRI-103 Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Our approach to forced or compulsory labor is included within our management approach to human rights, outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33
103-2	The management approach and its components	Our approach to forced or compulsory labor is included within our management approach to human rights, outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33
103-3	Evaluation of the management approach	Our approach to forced or compulsory labor is included within our management approach to human rights, outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33
GRI-409 Forced or Compulsory Labor 2016		
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	We have no operations or suppliers that we consider to have significant risk of forced or compulsory labor. As outlined in our Global Human Rights and Labor Standards Policy, and in the Human Rights section in the ESG Appendix of our 2020 Impact Report, we respect 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. We prohibit the use of slavery and human trafficking in our facilities, by our suppliers and business partners, including forced labor, in addition to bonded labor and domestic servitude. We would never require employees to lodge "deposits" of their identity papers (e.g., government-issued identification, passports, or work permits).

411 Rights of Indigenous Peoples

Disclosure	Description	Response or Reference
GRI-103 Management Approach 2016		
103-1	Explanation of the material topic and its boundary	The rights of indigenous peoples is included within our management approach to human rights, outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33
103-2	The management approach and its components	The rights of indigenous peoples is included within our management approach to human rights, outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33
103-3	Evaluation of the management approach	The rights of indigenous peoples is included within our management approach to human rights, outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33

GRI-411 Rights of Indigenous Peoples

411-1	Incidents of violations involving rights of indigenous peoples	We have identified no incidents of violations involving the rights of indigenous peoples in the last three years. As outlined in our Global Human Rights and Labor Standards Policy, and in the Human Rights section n the ESG Appendix of our 2020 Impact Report, 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.
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412 Human Rights Assessment

Disclosure	Description	Response or Reference
GRI-103 Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Our management approach to human rights is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33
103-2	The management approach and its components	Our management approach to human rights is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33
103-3	Evaluation of the management approach	Our energy management approach is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 33

GRI-412 Human Rights Assessment

412-1	Operations that have been subject to human rights reviews or impact assessments	As outlined in our Modern Slavery Act Statement, all our operations undergo an annual risk assessment which includes an assessment on human rights issues. Modern Slavery Act Statement											
412-2	Employee training on human rights policies or procedures	<div>As part of our ongoing compliance training, sales and purchasing teams employees completed training in human rights as part of a "CA Transparency in Supply Chain Act" course.</div> <table><tr><th rowspan="2"></th><th colspan="3">Total Employee Diversity</th></tr><tr><th>Course completions</th><th>Completion Hours</th><th>Percentage of employee completions vs. assigned</th></tr><tr><td>CA Transparency in Supply Chain Act</td><td>420</td><td>138</td><td>>99%</td></tr></table>		Total Employee Diversity			Course completions	Completion Hours	Percentage of employee completions vs. assigned	CA Transparency in Supply Chain Act	420	138	>99%
	Total Employee Diversity												
	Course completions	Completion Hours	Percentage of employee completions vs. assigned										
CA Transparency in Supply Chain Act	420	138	>99%										
412-3	Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	As outlined in our management approach, we have created a Supplier Code of Conduct to outline what we expect from our suppliers with respect to human rights. Suppliers are expected to adhere to this Code and shall operate in full compliance with all applicable laws and regulations.											

413 Local Communities

Disclosure	Description	Response or Reference
GRI-103 Management Approach 2016		
103-1	Explanation of the material topic and its boundary	At Berry, we strive to support the communities in which we work and serve. Our global footprint enables us to create a substantial community impact around the world. No matter the city, state, province, country, or continent, a common value that is demonstrated at each of our facilities is the commitment of our employees to partner with their local community to create a positive impact. Our approach to working with the local communities is outlined on our website, on the social and community support pages. Berry Global Social Berry Global Community Support
103-2	The management approach and its components	At Berry, we strive to support the communities in which we work and serve. Our global footprint enables us to create a substantial community impact around the world. No matter the city, state, province, country, or continent, a common value that is demonstrated at each of our facilities is the commitment of our employees to partner with their local community to create a positive impact. Our approach to working with the local communities is outlined on our website, on the social and community support pages. Berry Global Social Berry Global Community Support
103-3	Evaluation of the management support	At Berry, we strive to support the communities in which we work and serve. Our global footprint enables us to create a substantial community impact around the world. No matter the city, state, province, country, or continent, a common value that is demonstrated at each of our facilities is the commitment of our employees to partner with their local community to create a positive impact. Our approach to working with the local communities is outlined on our website, on the social and community support pages. Berry Global Social Berry Global Community Support
GRI-413 Local Communities 2016		
413-1	Operations with local community engagement, impact assessments, and development programs	Some of the positive involvement we have had with local communities in 2020, including our response to aid the fight against the COVID-19 pandemic, is outlined on our website, on the social and community support pages. No matter the city, state, province, country, or continent, a common value that is demonstrated at each of our facilities is the commitment of our employees to partner with their local community to create a positive impact. Berry Global Social Berry Global Community Support
413-2	Operations with significant actual and potential negative impacts on local communities	We do not believe any of our operations to have significant actual or potential negative impacts on local communities.

414 Social Supplier Assessment

Disclosure	Description	Response or Reference
GRI-103 Management Approach 2016		
103-1	Explanation of the material topic and its boundary	Our management approach to supplier engagement and environmental and social assessment, is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 38
103-2	The management approach and its components	Our management approach to supplier engagement and environmental and social assessment, is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 38
103-3	Evaluation of the management approach	Our management approach to supplier engagement and environmental and social assessment, is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 38
GRI-414 Supplier Social Assessment		
414-1	New suppliers that were screened using social criteria	New suppliers are initially screened for compliance with our Supplier Code of Conduct. Key suppliers are also required to recertify compliance annually. We are in the process of implementing a new system that would allow us to perform social and environmental supplier assessments on all active vendors annually. Supplier expectations are specified in our Purchase Order Standard Terms and Conditions. Purchase Order Standard Conditions

415 Public Policy

Disclosure	Description	Response or Reference								
GRI-103 Management Approach 2016										
103-1	Explanation of the material topic and its boundary	Our management approach to public policy is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 39								
103-2	The management approach and its components	Our management approach to public policy is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 39								
103-3	Evaluation of the management approach	Our management approach to public policy is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 39								
GRI-415 Public Policy 2016										
415-1	Political contributions									
		<table><tr><th></th><th>2018</th><th>2019</th><th>2020</th></tr><tr><td>Political Contributions (\$)</td><td>0</td><td>0</td><td>0</td></tr></table>		2018	2019	2020	Political Contributions (\$)	0	0	0
	2018	2019	2020							
Political Contributions (\$)	0	0	0							
		No political contributions were made, directly or indirectly, by our organization during the last three reporting periods.								

416 Customer Health and Safety

Disclosure	Description	Response or Reference								
GRI-103 Management Approach 2016										
103-1	Explanation of the material topic and its boundary	Our management approach to the safety of our products is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 36								
103-2	The management approach and its components	Our management approach to the safety of our products is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 36								
103-3	Evaluation of the management approach	Our management approach to the safety of our products is outlined in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 36								
GRI-416 Customer Health and Safety 2016										
416-1	Assessment of the health and safety impacts of product and service categories	We have programs in place to develop products and product solutions that are safe, compliant, and reliable. A full outline of our product safety approach can be found in the ESG Appendix of our 2020 Impact Report. 2020 Impact Report Page 36								
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	We have never initiated a recall for our products due to safety concerns.								
		<table><tr><th></th><th>2018</th><th>2019</th><th>2020</th></tr><tr><td>Product Recalls</td><td>0</td><td>0</td><td>0</td></tr></table>		2018	2019	2020	Product Recalls	0	0	0
	2018	2019	2020							
Product Recalls	0	0	0							

419 Socio-Economic Compliance

Disclosure	Description	Response or Reference
GRI-103 Management Approach 2016		
103-1	Explanation of the material topic and its boundary	As part of our management approach to business ethics, we conduct business in accordance with the highest ethical, moral, and legal standards. 2020 Impact Report Page 39
103-2	The management approach and its components	As part of our management approach to business ethics, we conduct business in accordance with the highest ethical, moral, and legal standards. 2020 Impact Report Page 39
103-3	Evaluation of the management approach	As part of our management approach to business ethics, we conduct business in accordance with the highest ethical, moral, and legal standards. 2020 Impact Report Page 39
GRI-419 Socio-Economic Compliance 2016		
419-1	Non-compliance with laws and regulations in the social and economic area I contributions	We have not received any significant fines for non-compliance relating in social or environmental incidents.