



berlin[®]
PACKAGING

Environmental, Social & Governance (ESG) Policy

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Introduction

Environmental

Social

Governance



“1 Berlin”: Creating History...In a Great Industry!

5 Focused Growth & Improvement Drivers



Safety / Sustainability

Become the industry's clear thought leader in **Safety / Sustainability**



People / Organization

Shape Berlin as THE place to be in our industry via world-class **People / Cultural Development** processes



Growth

Growth (min) 2X overall market organic and inorganically



Margins

Lead the industry in **Margins** (productivity / efficiency / pricing optimization)



Cash

Lead the industry in **Cash** management (enable reinvestment to GROW)

Introduction

[“1 Berlin”](#)

[Introduction](#)

[Environmental](#)

[Social](#)

[Governance](#)



Berlin Packaging L.L.C., together with its divisions, subsidiaries and affiliates around the globe (“Berlin Packaging,” the “Company,” “we” or “our”) is the world's largest Hybrid Packaging Supplier® of glass, plastic, and metal containers and closures. The Company supplies billions of items annually, along with offering value-added services, including structural packaging and brand design, sustainability solutions, worldwide sourcing, global warehousing and logistics, and quality and lab testing, for customers of all sizes across all industries. Berlin Packaging combines the best elements of manufacturers, distributors, and value-added service providers. Berlin Packaging's mission is to increase the net income of its customers through packaging products and services.

For more than 100 years, Berlin Packaging has demonstrated a strong commitment to conducting its business with integrity. We have been successful at growing our business and maintaining our reputation of lawful and ethical conduct. As a global leader in rigid packaging, Berlin Packaging is committed to operating responsibly and building a sustainable business based on uncompromising ethics and integrity.

As our Environmental, Social, and Governance (“ESG”) Policy details, the Company has defined standards about how we perform as environmental stewards, how we manage our relationships with employees, customers, suppliers, and the communities in which we operate, and the people, rules, processes and procedures to govern our business to ensure ethical behavior and sound business principles, with the goal of creating long-term value and sustainability for all stakeholders.

Environmental

"1 Berlin"

Introduction

Environmental

Social

Governance



A. Introduction

We are committed to protecting the environment and the communities in which we operate. Our approach is to collaborate with our employees, customers, and suppliers to identify, assess, and minimize any environmental impact resulting from our operations and the operations of our customers and suppliers. We take pride in being an industry leader in the growing field of sustainable packaging solutions and using design and innovation to help our customers achieve their sustainability goals.

B. Sustainability

We are committed to an evidence-based, industry specific, market informed and transparent approach to sustainability. We focus on the Company's direct impact on the environment, our impact on the communities in which we operate, the health and safety of our employees, the manner in which our suppliers and other vendors conduct their business, and helping our customers improve their own sustainability efforts. We are proud to offer innovative and sustainable packaging solutions that foster a circular economy. By focusing on material circulation, component optimization, and reuse, we help our customers and suppliers make the best choices that optimize their own commercial and environmental impact.

C. Supplier Code of Conduct

We expect our suppliers, vendors, and service providers to conduct their business ethically and responsibly. As detailed in our Supplier Code of Conduct, we require our suppliers, vendors, and service providers to operate in compliance with all applicable laws, including, but not limited to, anti-bribery and anti-corruption laws, employment laws pertaining to child labor, minimum wages, overtime compensation, hiring, and occupational safety.



A. Diversity and Inclusion

We respect diversity and take pride in having a workplace that is inclusive of all people and their unique abilities, strengths, and differences. An inclusive and diverse work environment, where we can openly share ideas, is a competitive business advantage as it fosters creativity and innovation.

We are an equal opportunity employer that does not discriminate on the basis of race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and related medical conditions), gender identity or gender expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information, or any other characteristic protected by applicable law. We are dedicated to ensuring the fulfillment of this policy with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities, access to facilities and programs, and general treatment during employment.

B. Anti-Discrimination and Anti-Harassment

The Company does not tolerate and prohibits discrimination or harassment on the basis of race, color, creed, religion, national origin, ancestry, citizenship status, age, sex or gender (including pregnancy, childbirth and related medical conditions), gender identity or gender expression (including transgender status), sexual orientation, marital status, military service and veteran status, physical or mental disability, genetic information, or any other characteristic protected by applicable law (referred to as "protected characteristics"). The Company is committed to a workplace free of discrimination, harassment, and retaliation. These behaviors are unacceptable in the workplace and in any work-related settings such as business trips and Company sponsored social functions,

regardless of whether the conduct is engaged in by a supervisor, co-worker, client, customer, vendor or other third party. The Company conducts regular sexual harassment and discrimination prevention training for all employees and locations.

C. Workplace Safety

We are strongly committed to providing a safe workplace for our employees and minimizing the risk of personal injury and property damage. We have established safety programs to: (i) educate and foster training on health and safety in the workplace; (ii) ensure compliance with applicable laws and regulations concerning health and safety; and (iii) enforce all guidelines and policies with transparency and accountability. All accidents and any condition or work practice that may result in personal injury, illness, and/or property damage are reported immediately to appropriate management, and such safety matters are further reported to the Company's Board of Directors.

D. Labor and Compliance

We comply with all applicable laws and regulations concerning labor and employment in all countries, states, provinces, and municipalities where we operate. We do not engage or participate in child labor, forced labor or human trafficking. Under no circumstances do we allow the use of forced, trafficked, child, prison, indentured or bonded labor in our operations, and we forbid the use of corporal punishment or other forms of mental and physical coercion as a form of discipline, in our operations. We require working hours and employee compensation to comply with all applicable wage and compensation requirements as defined under applicable labor laws for minimum wages, overtime, and other elements of compensation and employee benefits.

E. Anti-Bribery and Corruption

Our Company is committed to compliance with all applicable laws and regulations that relate to corruption, bribery, or money laundering, including, but not limited to, the U.S. Foreign Corrupt Practices Act (“FCPA”) and the UK Bribery Act. Employees, officers, directors, and third persons or entities acting on behalf of our Company are prohibited from (directly or indirectly) offering, providing, receiving or accepting money or anything of value to any government official or agency (including a national or local government official or employee, a political candidate, or an official or employee of a government-owned or controlled entity) or any other individual to secure a business favor, or favorable decision or advantage for the Company. It is against our Global Code of Conduct to offer or provide anything of value to facilitate a government process or to influence a government official. The Company conducts annual anti-bribery and corruption training for all employees and locations.

Social

[“1 Berlin”](#)

[Introduction](#)

[Environmental](#)

[Social](#)

[Governance](#)

F. Global Code of Conduct

The Company has established a Global Code of Conduct that sets out standards that all employees must follow, regardless of work location. Each year our employees pledge to read, understand, and abide by our Global Code of Conduct and to raise questions or concerns to the applicable party if the employee ever learns about conduct that may be inconsistent with our Global Code of Conduct.

G. Employee Engagement & Auditing

We conduct anonymous employee surveys to gauge employee engagement and satisfaction and to identify ways to further strengthen and improve our culture. We also periodically conduct employee audits to help measure our diversity and ensure compliance with applicable laws and regulations.

Governance

[“1 Berlin”](#)[Introduction](#)[Environmental](#)[Social](#)[Governance](#)

A. Board of Directors

We understand that corporate governance requires a combination of good people, rules, processes, and procedures to ensure that our decisions consider many factors, including economic, social, regulatory and market concerns. Our Board of Directors is committed to ethical behavior and sound business principles, while creating long-term value and sustainability for all stakeholders. Our Board of Directors places particular emphasis on the wellbeing of our employees, and all meetings of our Board of Directors begins with a review of the health and safety of our employees.

B. Committees

Our Board of Directors has established a Leadership and Compensation Committee, comprised of 5 directors, including 3 independent directors, 1 of whom Chairs the committee. Among other matters, our Leadership and Compensation Committee oversees the Company's programs and practices for attracting, developing, training, and retaining talented employees at all levels, including succession plans for executive officers and employee compensation and benefits.

Our Board of Directors has established an Audit Committee, comprised of 3 directors, including 1 independent director who Chairs the committee. Our Audit Committee, oversees the Company's financial reporting and related internal controls, including its internal and independent auditors. Among other matters, our Audit Committee also regularly assesses the Company's risk management and compliance, including ethical, legal, and regulatory compliance, pending or threatened litigation, cybersecurity, and reports to our global compliance helpline.

Governance

[“1 Berlin”](#)[Introduction](#)[Environmental](#)[Social](#)[Governance](#)

C. Reporting Concerns

The Company has established a global compliance helpline where employees, customers, suppliers, and other third parties can anonymously report concerns pertaining to any possible illegal, unethical, grossly improper behavior, or violation of our Global Code of Conduct or other Company policy. This Compliance helpline is run by an independent third party and is available 24 hours a day, 7 days a week and in all languages of the countries where we operate. The Company does not tolerate retaliation against anyone who in good faith raises questions or concerns about a potential violation of the law, our Global Code of Conduct or Company policies, or who assists in an investigation of a reported violation. All reports to our compliance helpline are promptly and appropriately addressed by management, and such matters are further reported to the Company's Board of Directors.