



Environmental, Social & Governance (ESG) Policy

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1. Introduction



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, serving a wide range of end-markets: food, beverage, personal care, beauty, OTC, pet vet, pharmaceuticals, industrial, home fragrance and others.

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.

At Berlin Packaging, we aim to be an industry-leading provider of sustainable packaging products and services.

As a global leader in the packaging industry, Berlin Packaging is committed to operating responsibly and building a sustainable business based on uncompromising ethical behavior, transparency, and compliance with all legal requirements.

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 run our business to ensure ethical behavior, with the goal of **creating long-term value for all stakeholders**.

2. Our Sustainability Framework



As Hybrid player in the packaging industry, **we play a strategic role in the value chain**, working together with our customers and suppliers to foster a culture of sustainability. We are material and supplier-neutral and we enjoy the best “trusted” position to provide our customers with substantiated sustainability claims.

We believe the perfect package is about more than just protecting and preserving the product inside. It’s about differentiating from the competition, standing out on the shelf and online, creating an effective and memorable user experience, and equally as important, protecting and preserving the environment for generations to come by incorporating sustainable attributes in packaging.

Our approach is to collaborate with our customers, suppliers, and employees to identify, assess, and minimize any environmental and social impact, resulting from our operations and the value chain.

Our general commitment is part of a wider and global Sustainable Framework, based on the main International Standards, in terms of Social Responsibility Guidelines (**ISO 26000**), as well as the **United Nations Global Compact**.

Under the umbrella of our sustainable framework, human rights represent a crucial aspect, to which Berlin Packaging is committed: the Group operates within the framework of the Universal Declaration of Rights United Nations Human Rights and ILO (International Labor Organization) Fundamental Conventions and in line with the United Nation Guiding Principles on Business and Human Rights.

Our Sustainability Framework

To foster the pursuit of these ambitious goals both in terms of social and environmental issues, Berlin Packaging adopts the values of sustainable growth as expressed by the OECD (Organization for Economic Cooperation Development), combining the principles of prosperity and well-being for all. The idea behind the Group's business approach is based on always performing high quality standards to its customers, as well as on taking the responsibility to face the main social economic and environmental challenges dictated by the global context.



BERLIN PACKAGING AND ITS COMMITMENT TOWARDS SDGs

Berlin Packaging is committed in pursuing its business goals, also considering the Sustainable Development Goals framework, as recognized under the United Nations Agenda 2030.

Within this framework, the Group has identified some specific Sustainable Development goals and targets on which it has an impact, aware of its responsibility both to contribute and to mitigate its performances.

SDGs	SDGs Targets	Berlin Packaging Material Topics
7 AFFORDABLE AND CLEAN ENERGY 	7.2 By 2030, increase substantially the share of renewable energy in the global energy mix 7.3 By 2030, double the global rate of improvement in energy efficiency.	<ul style="list-style-type: none"> • Climate change & low-carbon society • Responsible supply chain management
9 INDUSTRY, INNOVATION AND INFRASTRUCTURE 	9.4 By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities.	<ul style="list-style-type: none"> • Climate change & low-carbon society • Responsible supply chain management
12 RESPONSIBLE CONSUMPTION AND PRODUCTION 	12.2 By 2030, achieve the sustainable management and efficient use of natural resources. 12.5 By 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse. 12.6 Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle.	<ul style="list-style-type: none"> • Packaging circularity

3. Governance



3.1 Corporate Governance

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 for all stakeholders.

Our **Board of Directors** has established a **Leadership and Compensation Committee**, comprised of five directors, including three independent directors, one 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 also established an **Audit Committee**, comprised of three directors, including one 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.

3.2 Sustainability Governance

Governance and accountability are crucial to ensuring alignment and prioritization across our business. **We've deeply integrated ESG into the way we do business:** through robust management systems, we maintain consistent reporting practices, foster leadership commitment at all levels, and actively engage our key stakeholders. **We integrate core ESG principles into our business through diverse governance mechanisms including policies, committees, and networks.**

Governance

The Board oversees sustainability growth strategy and ESG performance and targets. The Board conducts strategy reviews on an annual and as-needed basis and ensures the business is managed ethically and responsibly.

The Global CEO and Senior Leadership Team reviews and evaluates ESG strategy, practices, and policies quarterly and on an ad-hoc basis, providing recommendations as needed. The Senior Leadership Team approves major ESG programs and monitors our progress toward our goals.

The Vice President of Sustainability is accountable for ESG-related issues and decisions and drives our sustainability growth strategy, manages our ESG strategy and reporting initiatives, and provides quarterly and ad-hoc progress updates to the Senior Leadership Team.

The ESG Steering Committees (covering our Americas and EMEA regions) strategically drive and implement ESG initiatives at the global, national, regional, and local level.

Chaired by VP of Sustainability and comprised of global representatives from: Sustainability; HR; Legal; Procurement; Sales; Design and Engineering; Finance; Supply Chain; Operations; Marketing and Communications and IT.

Our ESG Regional Coordinators measure and report our ESG performance, adapt to evolving regulations, and embed sustainability practices at the local level.

4. Environment



We are committed to contributing to a more sustainable world, starting from our core business. From our products to our operations, we want to reduce and mitigate our environmental impacts. We aim to foster a sustainability culture, promoting virtuous experiences and collaborations with our suppliers and with the communities where we operate. We aim to support our customers in achieving their sustainable packaging goals. We are committed to an evidence-based, industry-specific, market-informed, and transparent approach to sustainability.

4.1 Sustainable Packaging

A significant effort in terms of more sustainable use of the resources is linked to the efficiency we develop in our packaging solutions. We develop packaging solutions that are innovative and responsive to customers' and consumers' needs and embrace sustainability holistically across the entire life cycle of our packaging. For instance, prioritizing the use of recycled materials and developing recyclable solutions for our customers. Thanks to Studio 111, our internal design and innovation studio, we can apply these principles to foster packaging circularity and to provide our customers solutions with premium design and functionality, emphasizing circularity, optimization, and refill/reuse packaging models. We strongly believe in the value of innovation to unlock the power of circularity and sustainability.

C

CIRCULARITY

- Recyclability
- Recycled content
- Strategic sourcing and stock solutions
- Material innovation and discovery

OPTIMIZATION

- Lightweighting
- Packaging and product efficiency
- Value analysis / Value engineering
- Local manufacturing

R

REUSE & REFILL

- In-house, on-the-go and in-store refill systems
- Reuse & refill system design and implementation

e

ENVIRONMENTAL SERVICES

- Sustainability strategy roadmapping
- Consumer and market insights
- Quantitative assessments
- Custom design and product innovation
- Sustainability education and communications

Environment

Our main goals are:

- Increase, year-over-year, the number of customer engagements focused on sustainable packaging solutions.

4.2 Climate Change Mitigation and Adaptation

Berlin Packaging operates as a hybrid supplier of packaging solutions, meaning that the Group is not directly involved in energy-intensive manufacturing processes.

Berlin Packaging is committed to measuring, recording, and reporting its significant Scope 1, 2, and 3 emissions, linked to energy usage at its buildings (e.g. natural gas for heating purposes, electricity to power operations, etc.) and the emissions generated along the value chain.

We are committed to progressively reducing and minimizing the GHG emissions by decarbonizing our operations and implementing changes to make our processes energy efficient, monitoring our usage and transitioning to renewable sources of energy. We also encourage similar actions with our supplier partners. Additionally, we also consider implementing **GHG offsetting initiatives**, thanks to reliable emissions reduction programs and partnerships.

Our main goals are:

- Reduce 42% absolute reduction of Scope 1 and Scope 2 by 2030, based on 2022, in line with the **Science Based Target Initiative (SBTi)**.
- Reduce 25% absolute reduction of Scope 3 by 2030, based on 2022, in line with the Science Based Target Initiative (SBTi).
- Implement **dedicated initiatives with our critical suppliers** to reduce our indirect emissions linked to the manufacturing and end-of-life management of the packaging we provide to our customers.
- **Expand the number of Products in our Portfolio** for which we can implement carbon reduction and compensation programs.
- Implement measures to improve the **energy efficiency** in our buildings, also based on preliminary environmental assessments.

Environment

4.3 Prevention of Pollution and Biodiversity Preservation

We are committed to preventing pollution, working both on our direct operations and with our partners along the value chain.

Concerning our **internal operations**, we strive to prevent and reduce the waste generated by our employees for office purposes and in the warehouses for logistics operations. Through waste management programs, we work to prevent waste generation, implementing a proper waste management system in all our sites that emphasize reuse and recycling at our warehouses. Additionally, we partner with our customers and suppliers to create closed-loop systems that reduce waste.

We are also committed to increasing the **environmental awareness of our employees by developing partnerships with external stakeholders**, helping conserve, protect, and restore ecosystems. We cooperate with, national and international, associations and networks to strengthen the culture of circularity and sustainability, sharing best practices and experiences.

Our main goals:

- Achieve 90% or more landfill waste diversion in twenty strategic warehouses globally, by 2030.
- Increase the coverage of the ISO 14001 certification for all the sites in EMEA.
- Divert waste from landfills, implementing waste management systems in 100% of our EMEA sites by the end of 2025.
- Engage our employees in participating in at least one community project to conserve, protect, or restore strategic local ecosystems every year.

5. Social



Our People are the pivot of our business and are crucial to assure customers' long-term success.

Similarly, we strongly believe that the employment relationship is based on the concept of making mutual commitments between the employer and each individual employee. This principle, as defined in the **Berlin T-chart**, is the basis of our Group's values. We are committed to promoting a virtuous approach also with all our external stakeholders.

BERLIN OWES EMPLOYEE	EMPLOYEE OWES BERLIN
Leadership Coaching & Training Chance to Grow Collegiality Job Security Rewards	Strong Work Ethic Productivity Innovation Teamwork Loyalty Profitability

As Company, we have in place a dedicated **Berlin Packaging Helpline**, easily accessible, that allows our stakeholders (internal and external) to bring the attention to the potential abuse in terms of working conditions, human rights, discrimination, corruption.

We are committed to periodically **engage and listen to our employees**, thanks to dedicated employees surveys and meetings.

Social

5.1 Labor Practices

Our Company, aware of the fact that working conditions greatly affect the quality of life of workers and their families, is fully committed to putting in place all policies and practices relating to work performed within, by, or on behalf of the Organization, in compliance with national laws and regulations and in line with the principles stated by the International Labor Organization (ILO). Our social responsibility takes shape in some main working-areas, that deal with employment relationships, health and safety, social dialogue and People development and training.

5.1.1 Employment and Working Conditions

Berlin Packaging recognizes the relevance of **secure employment**, ensuring compliance with all applicable laws and regulations concerning labor and employment in all countries, states, provinces, and municipalities where we operate.

We **provide decent working conditions** with:

- Adequate wages in accordance with national laws, regulations and collective agreements;
- Compensation of working and extra-hours, and ensuring weekly rest, holidays in compliance with national laws and regulations;
- Avoid the excessive use of work performed on a temporary basis, except where the nature of work is genuinely short-term or seasonal.
- Provide reasonable notice, timely information, and, jointly with workers' representatives (where they exist), when considering significant changes in its operations (e.g. closures that affect employment).
- Health care coverage for our employees.
- Flexible working conditions, parental leave and other benefits that can contribute, as much as possible, to a proper work-life balance
- Bonus schemes related to Company's performances

Berlin Packaging recognizes the **freedom of association and the effective recognition of the right to collective bargaining**, the elimination of all forms of forced or compulsory labor and the abolition of child labor.

We want to also encourage our partners along the value chain to follow responsible labor practices.

5.1.2 People, Well-Being, Health, & Safety

Our goal is to **strengthen the culture of health and safety as well as of the employees' wellbeing**, creating a working environment where our employees can feel good, be themselves and express their highest talent potential.

Social

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 health and safety Programs to:

- Communicate the H&S requirements the workers should follow, educate and foster training on health and safety in the workplace, and to provide the safety equipment needed;
- Ensure compliance with applicable laws and regulations concerning health and safety;
- Enforce all guidelines and policies with transparency and accountability; and,
- Assess and control any potential health and safety risks.

All accidents and any condition or work practice that may result in personal injury, illness, and/or property damage are recorded and reported immediately to appropriate management, and such safety matters are further reported to the Company's Board of Directors.

5.1.3 Training & People Development at the Workplace

We aim to **empower our People**, also to better answer to their ambitions and our customers' expectations. To achieve this goal, we want to invest in our People, providing them access to **skills development, training, and opportunities for career advancement and career mobility**, ensuring constant and cross-cutting internal training pathways.

We are committed to performing periodic salary reviews based on performance and development and follow salary structures based on job structures and salary benchmarking.

Our main goals:

- Increase the awareness of our employees, ensuring a safe and healthful workplace, going beyond legislative compliance.
- Launch the certification process based on ISO 45001 (EMEA scope).
- Zero lost-time accidents by 2030
- Periodic assessment of individual performances
- Implement dedicated sustainability onboarding sessions for all new employees.
- Deliver specific training sessions on sustainability (e.g. on regulations, D&I, Ethics and Integrity) to dedicated internal teams (Sales; Procurement etc) through a dedicated digital Platform (Docebo).

5.2 Human Rights

In line with the main international Standards and Declarations, the Company is fully aware of the importance of respecting **human rights** throughout all its operations.

Social

To pursue this goal, Berlin Packaging is committed to exercising **due diligence** to identify, prevent, and address actual or potential human rights impacts resulting from its operations or from the activities of those with which have commercial relationships.

Berlin Packaging carries out its activities in compliance with human rights principles, addressing any adverse human rights impacts with which the Group itself and its main suppliers are involved. 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.

5.2.1 Diversity & Inclusion

In line with the values at the heart of our **Global Code of Conduct**, we reject **any kind of discrimination or harassment** based on 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. Moreover, we are also committed to increasing our effort in ensuring that we are not contributing to discriminatory practices through the commercial relationship with our partners along the value chain.

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 want to ensure equal opportunities at all phases of the employment relationship, from the recruiting process and hiring, to the placement promotion and training, as well as remuneration and benefits.

Our main goals:

- Conduct regular harassment and discrimination **prevention training for all employees and locations**.
- Develop a Training Plan for our hiring managers to **minimize bias**.

6. Fair Operating Practices



We want to create value sustainably, providing high operational performances and promoting values of integrity, respect, and trust both internally and together with our external stakeholders. **Transparency and ethics are overarching pillars of our way of doing business.**

The Company supports the global sustainable development Agenda, also joining the **United Nations Global Compact**, with the aim to set up a responsible approach and value system, incorporating the 10 Principles of the UN Global Compact in the areas of human rights, labor, environment and anti-corruption into the Group's strategy and establishing a culture of integrity, essential for a long-term success.

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.

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.

Fair Operating Practices

We are committed in **assessing and identifying risks of corruption** and maintaining internal practices that counter corruption and extortion.

Our Leadership Team provides commitment and supports the implementation of anti-corruption practices and anti-competitive behaviors, also encouraging all its employees and partners in reporting any unethical behavior and unfair treatment. To achieve this goal, the Company has established a dedicated Whistleblowing Policy and 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.

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 regulation. We are committed to **fostering listening and dialogue with our stakeholders**, also thanks to dedicated stakeholder engagement initiatives.

Our Company is committed to **promoting social responsibility in the value chain**, considering potential impacts or unintended consequences of its procurement and purchasing decisions, also taking care to minimize any potential negative impacts.

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.

Our main goals:

- Raise the awareness of our employees about corruption and how to counter it, also thanks the conduction of annual anti-bribery and corruption training for all employees and locations.
- Share our Global Suppliers Code of Conduct among all our suppliers.
- Launch a dedicated Training Program on Sustainable Procurement dedicated to our Procurement Team.

7. Consumer Issues



The Group aims to create shared value for its stakeholders, always working to provide solutions that meet customers' expectations and the highest quality and healthy standards. Innovating and promoting solutions in terms of sustainability and traceability, able to meet the **highest quality standards for our customers**, also in line with the Quality Management System (**ISO 9001**) with a view to developing processes for continuous improvement and to better answer to all the technical features, as required by the current, national and international, legislation.

Our Company is committed in taking into account specific topics when dealing with consumers issues and social responsibility. In particular in terms of fair marketing practices; protection of health and safety; sustainable consumption; dispute resolutions and redress, data and privacy protection and education and awareness.

7.1. Fair Marketing Practices

Our Company is fully committed to **providing our customers all factual and unbiased information about our products and services**, with the aim to allow customers to make informed decisions about purchase and consumption, and to compare the features of different packaging solutions. We are working to strengthen our **internal processes to substantiate claims and assertions**, especially when dealing with sustainable products and solutions (also based on the upcoming Regulation on Green Claims).

Our main goals:

- Develop a dedicated internal process (both in NAM and EMEA) to review and validate all claims and assertions related to sustainability.

Consumer Issues

7.2 Customers' Health and Safety & Complaints

Berlin Packaging is committed to putting in place all measures to **provide safe products** to its customers and, consequently, to all end-users. We are committed to assessing all potential risks, also working on the product design, and adopting all measures to prevent products from becoming unsafe through improper handling or storage.

We are committed to providing products and services that **can increase our customers' satisfaction and reduce levels of complaints by offering high-quality solutions**. We take measures to prevent any potential complaints and have in place a process to review complaints in light of internal continuous improvement.

Our main goals:

- Continue our excellent customer health and safety legacy with zero product recalls every year.

8. Enforcement & Monitoring



The Sustainability Policy is drawn up in line with the values and principles of the Group's Code of Conduct and is valid for all Group companies at the Global level.

The Policy is shared among all the stakeholders and it is made available on the corporate website. The ESG Policy is constantly reviewed by the Berlin Packaging ESG Committee and is considered a dynamic instrument, to be updated in the light of the Group's strategic priorities (also as identified in the Sustainability Plan).

Under the present Policy and in line with values of transparency and accountability, Berlin Packaging is committed to assuring the disclosure of its main ESG performances, targets, and projects. This activity is part of the general commitment of the Group in terms of proactive and constant dialogue with all stakeholders.