



BERRY GLOBAL GROUP, INC. MODERN SLAVERY ACT STATEMENT

This statement is made in accordance with Section 54 of the UK Modern Slavery Act 2015 and sets out the actions taken by Berry Global Group, Inc. and its subsidiaries, including UK-based Berry UK Holdings Limited and all its subsidiaries, RPC Group Limited and its subsidiaries, RPC Containers Limited and its subsidiaries, British Polythene Limited and its subsidiaries, Maynard & Harris Plastics, Massmould Limited and Plasgran Limited (collectively, “Berry Global”) to identify and address potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring there is no slavery or human trafficking in its own business and supply chain.

About Berry Global

Berry Global is a leading global supplier of a broad range of innovative rigid and flexible products used every day within consumer and industrial end markets. We have more than 40,000 employees in operations that span over 200 locations on six continents, and generated approximately \$12.2 billion of sales in fiscal year 2024.

Merger Context and Scope

On 30 April 2025, Berry Global Group, Inc. completed a transformational all-stock merger with Amcor plc (“Amcor”), creating one of the world's largest consumer packaging and dispensing solutions for nutrition, health, beauty and wellness. The combined business brings together complementary capabilities in rigid and flexible packaging, material science and sustainability innovation, with a workforce of more than 75,000 employees across over 400 facilities in more than 40 countries.

This modern slavery statement primarily reflects the activities of legacy Berry Global entities for the fiscal year ended 30 September 2025 (FY2025), prior to full integration unless otherwise noted. Future statements will reflect the broader scope of the merged operations as integration progresses.

Following the merger, integration is underway to align governance frameworks, compliance systems and risk management methodologies across the combined businesses. As part of these efforts, Berry Global adopted Amcor’s Code of Conduct, Human Rights Policy and Supplier Code of Conduct which apply across all our operations. Adoption of these policies is a key step in strengthening our approach to preventing slavery and human trafficking.

Both entities have also initiated a review of whistleblower and reporting mechanisms for raising and addressing concerns to ensure consistency across the organization. Our expanded global footprint and complex supply chains reinforce the need for strong due diligence processes to meet obligations under the UK Modern Slavery Act and uphold our commitment to preventing and addressing slavery and human trafficking.

Supply Chain Overview

Berry Global’s supply chain includes the sourcing of polyolefin-based resins, inks, and other raw materials, packaging components, and equipment. We recognize that this has been a particularly difficult year for our suppliers, reinforcing the importance of robust risk management and ensuring we have an adequate number of qualified suppliers to meet business demand. Berry’s approach to



its supply chain is one of “local value delivery,” that is, we try to source intra-country whenever possible. We develop long-lasting relationships with our suppliers, which allows us to better understand their business models and commitment to following our Supplier Code of Conduct, including anti-slavery and anti-trafficking expectations.

Commitment to Human Rights

Berry Global is deeply committed to following the letter and spirit of the laws of all jurisdictions in which we do business, including laws designed to eliminate slavery and human trafficking, and expects the same high ethical standards from its globally diverse supply chain. Consistent with Amcor’s 2025 Sustainability Report, we affirm that we honor internationally-recognized human rights, including those promulgated by the International Labor Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work. We also expect the same high ethical standards of our globally diverse supply chain.

We recognize that slavery and human trafficking are serious global issues and affirm our responsibility to take a robust, transparent approach to mitigate these risks. The functions of Purchasing, Legal, Human Resources, Global Trade Compliance and Ethics and Compliance collaborate to track applicable laws, evaluate and monitor risks within our facilities and supply chain, raise awareness around policies and procedures, and conduct training.

Relevant Policies and Procedures

During FY2025, Berry Global operated under its Global Human Rights and Labor Standards Policy, Global Code of Business Ethics, Supplier Code of Conduct and Non-Retaliation Policy until the merger, following which Amcor’s Human Rights Policy, Code of Conduct, Supplier Code of Conduct and Whistleblower Policy were adopted.

The following policies and procedures govern our approach to the identification of modern slavery risks and steps taken to prevent slavery and human trafficking in our operations and supply chain.

- **Policy on Global Human Rights.** Designed to combat slavery and human trafficking and applies to all Berry Global team members and may be used to hold our suppliers and business partners accountable. The Human Rights Policy explicitly demonstrates our commitment to the United Nation’s Guiding Principles on Business and Human Rights, in addition to the ILO’s Declaration on Fundamental Principles and Rights at Work. It highlights our respect for internationally-recognized human rights and the dignity of all people. This includes, but is not limited to: freedom from forced labor, respecting the rights of children and indigenous peoples, compensating team members fairly, providing a safe work environment, following local laws and regulations and respecting freedom of association.
- **Speaking Up and Anti-Retaliation.** Following Berry Global’s merger with Amcor, both companies commenced a comprehensive review of their whistleblower processes and procedures. This review aims to harmonize the legacy Berry and Amcor systems, reduce case closure times and ensure consistency in how concerns are received, triaged, investigated and resolved across the combined organization. The integration process is ongoing and expected to continue into fiscal year 2026. As part of this effort, we are assessing opportunities to streamline reporting channels, enhance case management tools



and improve feedback loops to ensure that all stakeholders – including employees, suppliers and third parties – have access to effective, trusted and timely grievance mechanisms.

Consistent with Berry Global’s Non-Retaliation Policy, Amcor’s Whistleblower Policy provides clear guidance to team members and external stakeholders on how to report a concern and provides assurance of non-retaliation for doing so in good faith. All team members, suppliers, customers, and other key stakeholders are encouraged to report any concerns related to the direct activities of the organization or in its supply chain. This includes circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organization’s reporting procedure is designed to make it easy for team members to Speak Up if they see something, without fear of retaliation. We use EthicsPoint, a software-based system to support our 24/7 [Ethics Helpline](#) and incident management program. This helps identify the initial severity of the concern in order to escalate, as appropriate, and address it in a timely manner. Any issues around slavery and human trafficking would be categorized as a “high risk” and the corresponding response would be met with equal attention.

- **Code of Conduct.** The foundation for Berry’s ethical culture and demonstrates our commitment to maintain the highest ethical standards within our organization, supply chain and other business partners. Our Code is values-based and addresses the most salient ethics and compliance risk areas (including, human rights and anti-slavery). More specifically, it considers how to handle a situation where during a visit to a factory there appears to be child labor and/or unsafe working conditions. If a situation is unclear, our Code provides the following decision-making framework: (1) Are you complying with applicable laws and regulations? (2) Are you following company policies and values? (3) Are you prepared to take full responsibility for this decision and is this decision in the interest of the Company? (4) Would you be comfortable if this decision was made public? If the answer to any of the four questions is “no” or “unsure”, then we encourage our team members to seek guidance from the relevant Manager, Human Resources, Ethics & Compliance or Legal before proceeding.
- **Supplier Code of Conduct.** Berry Global is committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, act ethically and within the law in their use of labor. We reserve the right to audit our supplier facilities and are willing to work with them to ensure they meet the standards in the Supplier Code of Conduct and provide their workers with appropriate working conditions. Serious violations of the Supplier Code of Conduct may lead to the termination of the business relationship.
- **Conflict Minerals Policy.** Our [Conflict Minerals Policy](#) shows our commitment to the Organization for Economic Cooperation and Development’s (OECD) guidance on responsible sourcing, which includes broader efforts to support human rights. Specifically, we expect our supply chain to inform us if they source products with Conflict Minerals, and, if so, to provide additional context around mineral country of origin and the use of smelters and refiners.
- **Global Acquisition and Accountability Policy.** Berry Global’s [Global Acquisition and Accountability Policy](#) outlines our policies and procedures to comply with applicable laws,



including the California Transparency in Supply Chains Act of 2010 and the Trafficking Victims Protection Act that was signed into law on January 9, 2019. It also affirms our commitment to act as a responsible global corporate citizen and in a manner that reflects our corporate values. Our customers, from Fortune 500 companies to start up enterprises, rightly expect us to be a leader in principled procurement and we expect the same of our suppliers.

Risk Assessment and Due diligence

Berry Global performs an annual risk assessment, which includes our Board of Directors and Senior Management from each of the major functions (including the heads of Finance, Legal, Ethics and Compliance, Human Resources and Purchasing), all four divisions and representation from around the globe. Based on our risk assessment and due diligence processes, we consider the risk of slavery and human trafficking in our supply chain to be low. However, Berry also recognizes the severity of such activities should it become real. This is one reason why we undertake due diligence when considering working with new suppliers. New suppliers are required to agree to our current Supplier Code of Conduct and provide relevant certifications, including that (i) no materials supplied to Berry Global are produced directly or indirectly by means of slavery or human trafficking and (ii) they comply with all applicable laws regarding slavery and human trafficking in the country or countries in which they do business.

We have also strengthened our risk assessment and due diligence efforts by using EcoVadis, a software-based solution that provides holistic ESG due diligence ratings in four broad categories: Environmental, Labor & Human Rights, Ethics and Sustainable Procurement. The assessment closely examines the supplier's human resources processes (e.g., health safety, working conditions, career management) and human rights management (e.g., discrimination, harassment and child labor). The advantage of EcoVadis is that it is not sufficient to solely note processes and internal controls in place, it requires evidence of effectiveness (e.g., policies and procedures) to demonstrate success. An additional benefit of EcoVadis is that the software allows companies to assign corrective actions to their suppliers and partner with them, where appropriate, to bolster their efforts.

Monitoring

Berry Global not only performs due diligence on new suppliers, but regularly reviews existing suppliers. The main purpose of these reviews and onsite visits is to ensure suppliers are meeting our standards (e.g., quality and delivery). However, while reviewing and/or visiting a supplier, we may review their practices to ensure they are not participating in any form of slavery or human trafficking. Furthermore, EcoVadis provides real-time monitoring of our suppliers, so that if a "red flag" emerges, it will immediately be brought to our attention.

Training and Awareness-Raising Program

The Berry Global Legal Department has historically provided online ethics and compliance learning which covers Global Human Rights issues. It is an engaging and interactive course, which provides resources to Speak Up, if something does not seem right. All team members who are assigned the course have been required to complete it and attest to our Global Human Rights Policy and will complete similar training as required by Amcor pursuant to its Human Rights Policy.



Board Approval

This statement has been approved by the Board of Directors of Berry Global Group, Inc. on January 5, 2026.



Director's name/ Adam Borgman

Date: January 5, 2026