

August 3, 2020

Pactiv LLC
1900 West Field Court
Lake Forest, Illinois 60045-4828

RE: Pactiv Environmental Management System Policy

To All Pactiv LLC Employees:

Introduction and Scope

Pactiv's Environmental Management System (EMS) provides a means for effective management of environmental matters throughout all Pactiv locations. The EMS is designed to proactively address regulatory demands, maintain a high performance standard with the public and our employees, and minimize the environmental impact of our operations.

Pactiv's EMS is designed to enable and assist its operations group (manufacturing and warehouse locations) to comply with environmental regulations.

The scope of the EMS is to ensure compliance with environmental regulations, reduce Pactiv's environmental footprint, assist in continual cost improvement for the organization, and foster sustainability.

Leadership and Document Availability

Pactiv has developed an Employees and the Environment Policy as well as a Sustainability Policy that have been approved by top management. These policies cover our employee's responsibilities to ensuring sustainment of environmental excellence and our commitment to continual improvement in minimizing our environmental impact. Resources are committed to supporting the organization with a Corporate Environmental structure containing two Regional Managers and one Environmental Engineer reporting to the Director of EHS.

To foster communication Pactiv maintains an internal intranet site (SharePoint) where information is shared with employees as needed. Pactiv's public website is designed to share information with its customers and the public.

Planning

Pactiv has several aspects to its environmental management system that proactively address its compliance obligations and enable the system to achieve continual improvement. Each year environmental goals are set for each Pactiv location with quarterly calls and follow up held to ensure each goal is tracked to completion. In addition, Pactiv has a web-based compliance calendar system (Gensuite) that contains every regulatory obligation for each location. All federal, state, and local compliance obligations have been identified and documented in this system. Each task is assigned an owner and due date for completion. Also, each location has an electronic and manual environmental filing system to ensure all regulatory documentation is kept and retained as needed. Finally, the company has established an approval system for all capital projects that ensures regulatory concerns are addressed at the planning level of any capital improvement project.

All compliance tasks in Gensuite are tracked monthly with the expectation of 100% completion.

Pactiv has conducted a life cycle analysis on its products to ensure environmental aspects have been identified. Controls have been put in place to prevent any potential significant incidents such as RTO issues and blowing agent releases.

Support

Pactiv utilizes Gensuite Environmental Management System for all relevant internal communication. Communication of all EMS compliance notifications are generated via email for all compliance tasks. In addition, a monthly summary report is automatically generated and distributed via email to all levels of management within Pactiv.

Pactiv's Director – Environmental, Health & Safety maintains the Pactiv Environmental Policy. The Pactiv Environmental Policy provides a summary of Pactiv Corporate Environmental requirements and expectations for individual facility environmental programs. Pactiv also provides Environmental Management training to members of management at all facilities on an annual basis and is included in the Gensuite system for each location.

The Pactiv Corporate Environmental team provides Environmental Management training to members of management at all facilities on an annual basis. This training and all site specific training is included in the Gensuite system for each location. Annual management training addresses corporate environmental requirements as well as site specific programs.

Pactiv has multiple programs in place to identify and respond to emergency situations. These plans are reviewed at a minimum on an annual basis and managed as part of the Pactiv Gensuite Management System. Plans/programs include:

- **Emergency Response**
- **Risk Management**
- **Business Continuity**
- **Emergency Notification System**
- **Site Emergency Contact List**
- **Local Fire Department Tours**
- **Evacuation Drills**
- **Table Top Exercises**
- **Spill Prevention Control and Countermeasures**
- **Storm Water Pollution Prevention**

Performance Evaluation

Pactiv has well established mechanisms in place to monitor and measure environmental performance. Gensuite provides monthly compliance reports which allow all levels of management access to current state of environmental performance. The expectation each month is 100% completion of all environmental objectives. Pactiv also maintains an ongoing standard of "Triple Zeros" – Zero Notices of Violation, Exceedances and Releases. The Director – EH&S provides weekly reports to the executive team.

The corporate Regional Environmental Managers perform periodic E-audits of facilities. These audits are conducted based on site complexity, employee turnover and length of time since last E-audit. Audit action items are managed with the use of follow up A3s. The Regional Managers also perform at a minimum annual site visits for all locations within Pactiv. The more complex the site environmental programs the more frequent the visits. During those visits the Regional Managers use Leader Standard Work practices to insure compliance with all corporate and site environmental programs.

The Pactiv Environmental Team meets semi-annually. During these meeting the team reviews sustainability data, program compliance reporting, corporate and site initiatives, regulatory changes, program change implementation strategies and develops a six month plan for the next semi-annual meeting. Scheduled bi-weekly meetings are also part of the review process and are designed to address more immediate program needs. Site specific meetings are scheduled on an as needed basis between the Regional Manager and Director.

Improvement

All corrective actions related to the environment are managed in Gensuite. Gensuite is used to generate near-miss reports and inspection reports. The action tracking system in Gensuite also provides a means for dealing with one time corrective actions. More complex issues and corrective actions are presented by the Director – EH&S to the executive team. The approved corrective action and incident summary is then communicated to site management teams as opportunity to learn from the incident.