

Global Reporting Initiative (GRI) Index

Aptar's 2018 Corporate Sustainability Report highlights activities that took place across our global portfolio from January 1 – December 31, 2018 unless otherwise noted. This report was prepared in accordance with the GRI Standards: Core options. We obtained limited external assurance from ERM Certification and Verification Services. (ERM CVS) based on the International Standard on Assurance Engagement (ISAE) 3000 for the 2018 absolute data for electricity, fuel oil and natural gas. ERM CVS also provided limited assurance on the Scope 1 and Scope 2 greenhouse gas emissions from these sources, including both location-based and market-based factors as well as an assurance of our renewable energy purchases and Renewable Energy Credit (RECs) claims applied to the market-based factors.

The factors, as well as the assurance statements, are linked in the appropriate indicators within this index, and here:

- > [2018 Assurance Statement for Absolute Energy, Scope 1 & 2 Emissions and Renewable Energy](#)
- > [2018 Assurance Statement for Scope 1 & 2 \(Location and Market Based\) CO₂ Emissions](#)



Sustainable Development Goals

In September of 2015 world leaders united during a United Nations Summit to draft the Sustainable Development Goals (SDGs). In early 2016, seventeen topic areas, which universally apply to all, went into effect toward the 2030 Agenda for Sustainable Development. Member countries are committed to fight inequalities and tackle climate change, while ensuring that no one is left behind. Aptar's revised sustainability strategy is aligned to the following 16 SDG topics:



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Aptar is committed to supporting the United Nations Sustainable Development Goals. Throughout this GRI Index we have indicated where our activities affect one of the seventeen topics by placing the associated icon next to our response.

SUSTAINABLE DEVELOPMENT GOALS



100 Universal Standard

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
GRI 102 General Disclosures		
102-1	Name of the organization	AptarGroup, Inc.
102-2	a. A description of the organization's activities. b. Primary brands, products and services, including an explanation of any products or services that are banned in certain markets.	a. AptarGroup 2018 Annual Report (PDF: page 11) b. AptarGroup 2018 Annual Report (PDF: pages 11-14)
102-3	a. Location of the organization's headquarters.	Crystal Lake, Illinois, U.S.A.
102-4	a. Number of countries where the organization operates, and the names of countries where it has significant operations and/or that are relevant to the topics covered in the report.	AptarGroup 2018 Annual Report (PDF: page 21)
102-5	a. Nature of ownership and legal form.	AptarGroup 2018 Annual Report (PDF: page 9)
102-6	Markets served, including: i. Geographic locations where products and services are offered; ii. Sectors served; iii. Types of customers and beneficiaries.	AptarGroup 2018 Annual Report (PDF: page 11-14)
102-7	a. Scale of the organization, including: i. Total number of employees; ii. Total number of operations; iii. Net sales (for private sector organizations) or net revenues (for public sector organizations); iv. Total capitalization (for private sector organizations) broken down in terms of debt and equity; v. Quantity of products or services provided.	i. Total number of employees: 14,000 ii. Total number of operations: 48 (See the table on the Aptar website , which shows site nomenclature within our multiple data collection systems and reports) iii. Net revenues (for public sector organizations): \$2,765 million iv. Not applicable (not private sector) v. Aptar has more than 10,000 product types, which we categorize into almost 1,000 different product families. We provide these products to more than 5,000 customers worldwide.

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 102 General Disclosures

102-8	<p>a. Total number of employees by employment contract (permanent and temporary), by gender.</p> <p>b. Total number of employees by employment contract (permanent and temporary), by region.</p> <p>c. Total number of employees by employment type (full-time and part-time), by gender.</p> <p>d. Whether a significant portion of the organization's activities are performed by workers who are not employees. If applicable, a description of the nature and scale of work performed by workers who are not employees.</p> <p>e. Any significant variations in the numbers reported in Disclosures 102-8-a, 102-8-b and 102-8-c (such as seasonal variations in the tourism or agricultural industries).</p> <p>f. An explanation of how the data have been compiled, including any assumptions made.</p>	<p>Please see Table 102-8 below, of employees by region, employment contract category, gender and employee type. As it is ever-changing, the data presented in the table is a snapshot of the situation as of the end of December for the respective year for our fixed and unlimited term contract employees. The data for temporary employees represents an average count over the course of the entire year. Our definitions of these employee categories are provided in the Appendix. The table below includes data for newly acquired CSP Technology sites located in France, about 125 employees, but does not include any data from other sites acquired in 2018. These new sites will be included during the 2019 reporting year. Details of organizational changes around found in GRI 102-10 to the right.</p>
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TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 102 General Disclosures

102-9	<p>a. A description of the organization's supply chain, including its main elements as they relate to the organization's activities, primary brands, products and services.</p>	<p>Aptar sources components, raw materials, equipment, services and non-production items (e.g., energy and transportation) from suppliers around the world. In 2018, these purchases totaled approximately \$1.6 billion USD. We are in the process of transforming our purchasing approach to further centralize and streamline across our three business segments. We believe this work will help us to increase efficiency, implement better, more consistent tools and processes, and ultimately, create innovative solutions to overcome supply chain challenges.</p>
102-10	<p>a. Significant changes to the organization's size, structure, ownership or supply chain, including:</p> <ul style="list-style-type: none"> i. Changes in the location of, or changes in, operations, including facility openings, closings and expansions; ii. Changes in the share capital structure and other capital formation, maintenance and alteration operations (for private sector organizations); iii. Changes in the location of suppliers, the structure of the supply chain, or relationships with suppliers, including selection and termination. 	<p>Acquisitions and Partnerships form a critical part of our growth strategy and below are some of the significant highlights from 2018:</p> <ul style="list-style-type: none"> > Acquired CSP Technologies, a leader in active packaging technology. More on CSP can be found in the Solutions section of the report. > Acquired Reboul, an established brand with lipstick device technology for the prestige beauty market. > Continued construction on our facility in Guangzhou, China scheduled to open in 2019. <p>We continue to explore possibilities to partner with, or acquire, companies offering an attractive geographic footprint or strong intellectual property. We will also continue to look at investing in, or partnering with, start-ups. In turn, this enables us to leverage the scope and scale of Aptar's capabilities to bring new and disruptive solutions to our customers.</p>

Table 102-8 Total Number of Employees

REGION	EMPLOYEE CATEGORY	2018					2017					2016				
		MALE	FEMALE	M&P EMPLOYEES ¹	OTHER EMPLOYEES ¹	TOTAL	MALE	FEMALE	M&P EMPLOYEES ¹	OTHER EMPLOYEES ¹	TOTAL	MALE	FEMALE	M&P EMPLOYEES ¹	OTHER EMPLOYEES ¹	TOTAL
Central Europe	Fixed + Unlimited Term Contract	1,757	878	326	2,309	2,635	1,699	845	310	2,234	2,544	1,507	744	273	1,978	2,251
	Temporary	113	52	-	165	165	160	106	-	266	266	65	48	-	113	113
West Europe	Fixed + Unlimited Term Contract	2,687	1,543	931	3,299	4,230	2,472	1,373	830	3,015	3,845	2,459	1,396	838	3,017	3,855
	Temporary	547	439	7	979	986	482	499	76	905	981	516	428	14	930	944
South Europe	Fixed + Unlimited Term Contract	526	96	122	500	622	526	91	117	500	617	525	92	127	490	617
	Temporary	133	61	-	194	194	93	58	-	151	151	101	46	-	147	147
North America	Fixed + Unlimited Term Contract	1,159	788	605	1,342	1,947	1,212	785	606	1,391	1,997	1,207	768	604	1,371	1,975
	Temporary	40	27	-	67	67	45	36	-	81	81	43	23	-	66	66
China	Fixed + Unlimited Term Contract	500	427	115	812	927	506	436	98	844	942	509	419	92	836	928
	Temporary	-	-	-	-	-	-	2	-	-	2	6	5	-	11	11
Latin America	Fixed + Unlimited Term Contract	768	455	285	938	1,223	741	440	278	903	1,181	738	439	254	923	1,177
	Temporary	17	18	-	35	35	22	24	-	46	46	7	26	-	33	33
Southeast Asia and India	Fixed + Unlimited Term Contract	355	205	86	474	560	355	209	88	476	564	403	235	92	542	634
	Temporary	177	98	-	275	275	132	71	-	203	203	132	80	-	212	212
Aptar Total	Fixed + Unlimited Term Contract	7,752	4,392	2,470	9,674	12,144	7,511	4,179	2,327	9,363	11,690	7,348	4,093	2,280	9,157	11,437
	Temporary	1,027	695	7	1,715	1,722	934	796	76	1,652	1,730	354	228	-	582	582

¹ See **Appendix** for definitions

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
GRI 102 General Disclosures		
102-11	a. Whether and how the organization applies the Precautionary Principle or approach	<p>Every product manufactured by Aptar must comply with applicable regulations in the regions where it is produced. To ensure compliance, full transparency and in order to help protect consumers and the environment, Aptar has set up dedicated regulatory and quality policies and control departments tasked with:</p> <ul style="list-style-type: none"> > Carrying out continuous regulatory monitoring and selecting key relevant requirements > Providing customers with relevant material data > Proactively collaborating with the supply chain to phase out potentially hazardous substances > Meeting customer-specific needs regarding substances of interest <p>To achieve these aims, Aptar establishes strong relationships with supply chain partners and professional associations, defines specific regulatory specifications for each type of material, collects and analyzes supplier declarations information.</p>
102-12	a. A list of externally-developed economic, environmental and social charters, principles, or other initiatives to which the organization subscribes, or which it endorses.	See GRI 102-13 below and the Suppliers/Partners section
102-13	a. A list of the main memberships of industry or other associations, and national or international advocacy organizations.	Aptar may join via financial support or advocate particular viewpoints on public policy via trade associations that add value to our company, stockholders and employees. Many of these organizations have diverse industry members and cover various relevant issues. These associations and memberships vary by country, region and business segment. As it relates to sustainability, details on partner organizations and memberships can be found in the Supplier/Partners section of the report.
102-14	a. A statement from the most senior decision-maker of the organization (such as CEO, chair or equivalent senior position) about the relevance of sustainability to the organization and its strategy for addressing sustainability.	See CEO Letter
102-16	a. A description of the organization's values, principles, standards and norms of behavior.	<p>Aptar teaches Core Values through internal training programs offered to different categories of employees.</p> <ul style="list-style-type: none"> > We believe in the self-worth of individuals regardless of their status > We strive for relationships that are based on openness, honesty and feedback > We promote teamwork and cooperation at all levels > We challenge people to develop their potential and to take initiative > We practice business relationships that are based on responsibility and on long-term and mutual interests to all stakeholders <p>Besides those values, Aptar norms of behavior and conduct are embodied within the Code of Business Conduct & Ethics. The Code of Business Conduct & Ethics summarizes the long-standing principles of conduct that Aptar and its subsidiaries follow to ensure integrity and compliance with the law.</p>

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
GRI 102 General Disclosures		
102-17	a. A description of internal and external mechanisms for: <ul style="list-style-type: none"> i. Seeking advice about ethical and lawful behavior, and organizational integrity; ii. Reporting concerns about unethical or unlawful behavior, and organizational integrity. 	<ul style="list-style-type: none"> i. Aptar has an internal Legal Affairs department with global representation. Employees are encouraged to seek advice about ethical and lawful behavior, and organization integrity, by contacting a member of the legal department. ii. Aptar has several alternatives for reporting concerns about unethical or unlawful behavior. First, Aptar has an independent third-party SAAS whistleblower hotline. This hotline allows users to report allegations across the globe in many different languages. Users have the ability to report anonymously. Second, employees also have the ability to report allegations through Aptar's Compliance Officers. Finally, employees can report allegations through their managers or through their local human resources department.
102-18	a. Governance structure of the organization, including committees of the highest governance body. b. Committees responsible for decision-making on economic, environmental and social topics.	<p>a. AptarGroup Governance Highlights</p> <p>b. Aptar governance is organized in four committees:</p> <ul style="list-style-type: none"> > The Audit Committee is in charge of assisting Aptar's Board of Directors in overseeing Aptar financial statements, compliance with the applicable laws, independent auditors and internal audit > The Compensation Committee is in charge of the compensation of Aptar executives > The Governance Committee is in charge of identifying, evaluating and recommending individuals qualified to be directors of Aptar > Finally, the Executive Committee is in charge of performing the duties and exercising the powers delegated to it by the Aptar Board of Directors
102-20	a. Whether the organization has appointed an executive-level position or positions with responsibility for economic, environmental, and social topics. b. Whether post holders report directly to the highest governance body.	The highest level of direct responsibility for environmental and social topics within Aptar is Beth Holland, Vice President, Operational Excellence, EHS & Sustainability. Currently, this positions reports in through our Operational Excellence organization, which reports directly to the Executive Committee.
102-25	a. Processes for the highest governance body to ensure conflicts of interest are avoided and managed. b. Whether conflicts of interest are disclosed to stakeholders, including, as a minimum: <ul style="list-style-type: none"> i. Cross-board membership; ii. Cross-shareholding with suppliers and other stakeholders; iii. Existence of controlling shareholder; iv. Related party disclosures. 	Business decisions must be made in the best interest of Aptar, not motivated by personal interest or gain. Therefore, as a matter of policy, all employees, officers and directors must avoid any actual or perceived conflict of interest. Additional information on this topic are found within our Code of Business Conduct and Ethics .

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
GRI 102 General Disclosures		
102-27	Measures taken to develop and enhance the highest governance body's collective knowledge of economic, environmental and social topics.	The Global EHS & Sustainability Organization provides regular updates to the board on relevant sustainability topics. However, there are no internal focused trainings for the Executive Committee or the Board of Directors.
102-40	a. A list of stakeholder groups engaged by the organization.	From year to year we alternate the method by which we conduct our sustainability materiality assessments between intense activity inclusive of one-on-one interviews and focus groups and passive online surveying (see GRI 102-46 to the right). In 2018 we conducted one-one-one surveys with some of the members of our Executive Committee. We keep in close contact with many key customers, suppliers and a few investors who help us shape our focus areas, and we also collect feedback through a materiality survey which is hosted within our annual sustainability report. Throughout 2016, 2017 and 2018 we received feedback on our materiality survey from Aptar employees, members of Board of Directors, suppliers, customers, community leaders and sustainability thought leaders (like consultants providing sustainability related services). We will use a similar survey process to collect feedback on this report throughout 2018.
102-41	a. Percentage of total employees covered by collective bargaining agreements.	Please see Table 102-41 below. We believe this information to be accurate +/-10 percent.

TABLE 102-41 Collective Bargaining

Region	2018 Percentage	2017 Percentage	2016 Percentage
Central Europe	12.50	12.50	12.50
West Europe	93.42	94.12	94.50
South Europe	100.00	99.67	99.00
North America	6.68	7.06	7.80
China	100.00	100.00	100.00
Southeast Asia and India	0.00	0.00	0.00
Latin America	85.70	85.70	85.70
Aptar Total	57.00	57.00	57.1

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
GRI 102 General Disclosures		
102-42	a. The basis for identifying and selecting stakeholders with whom to engage.	See GRI 102-46 below.
102-43	a. The organization's approach to stakeholder engagement, including frequency of engagement by type and by stakeholder group, and an indication of whether any of the engagement was undertaken specifically as part of the report preparation process.	See GRI 102-46 below.
102-44	a. Key topics and concerns that have been raised through stakeholder engagement, including: <ol style="list-style-type: none"> i. How the organization has responded to those key topics and concerns, including through its reporting; ii. The stakeholder groups that raised each of the key topics and concerns. 	For several years we have worked diligently to understand the needs of our customers, investors and employees as they relate to sustainable materials. Throughout 2016 and 2017, we received several requests for trials of Post-Consumer Recycled (PCR) resin and alternative materials from other customers and other stakeholders. In 2018, the packaging industry was spotlighted as awareness of issues with plastics pollution and recyclability were spotlighted in the media. Concerns from various stakeholders on this topic were raised, playing a part in the importance of the creation of our Product Sustainability Team and revised product sustainability strategy.
102-45	a. A list of all entities included in the organization's consolidated financial statements or equivalent documents. b. Whether any entity included in the organization's consolidated financial statements or equivalent documents is not covered by the report.	AptarGroup 2018 Annual Report (PDF: page 21) See the Aptar website for a detailed list of our operations which shows site nomenclature within our multiple data collection systems and reports.
102-46	a. An explanation of the process for defining the report content and the topic Boundaries. b. An explanation of how the organization has implemented the Reporting Principles for defining report content.	Aptar conducts materiality assessments to define report content and aspect boundaries. Our materiality assessment process enables us to focus on different stakeholder groups from year to year. In preparation for our 2018 Corporate Sustainability Report, elements of the assessment included: <ul style="list-style-type: none"> > In conjunction with the 2017 Corporate Sustainability Report, we published a subsequent online materiality assessment survey to allow feedback on the 2017 report content. We then used the results of that online survey to verify our approach and establish the content of this 2018 Corporate Sustainability Report. We will use a similar survey process to collect feedback on this 2018 report. > Customer and Peer Analysis: Aptar conducted a landscape assessment to better understand the current level of sustainability reporting in the industry and to realign our targets > Interviews: Aptar conducted one-on-one interviews with senior executives to better understand their vision for sustainability at Aptar > Investor Communication: We participated in conversations with current and potential investors that are managing ESG funds in order to show them Aptar's progress and share ideas

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 102 General Disclosures

102-47	a. A list of the material topics identified in the process for defining report content.	<p>Since our 2015 Corporate Sustainability Report, Aptar has focused on the following material topics:</p> <ul style="list-style-type: none"> > Economic: Economic Performance, Procurement and Practices > Environmental: Energy, Effluents and Waste, Emissions, Compliance, Supplier Environmental Assessment > Social: Training and Education, Local Communities, Anti-Corruption, Compliance, Occupational Health & Safety, Diversity & Equal Opportunity, Employment, Labor/Management Relationships, Investment, Supplier Human Rights Assessment, Supplier Assessment for Impact on Society, Customer Health and Safety, Product and Service Labeling, Marketing Communications, Customer Privacy, Compliance <p>The updates to our materiality assessments have returned similar suggestions, with a request to report more specifically on these four key issues:</p> <ol style="list-style-type: none"> 1. That Aptar manufactures products made from sustainable materials; 2. That Aptar remains conscious of energy consumption within our operations; 3. That we provide innovative solutions that are able to be recycled upon end of use. 4. That Aptar engages more with outside partnerships and organizations on sustainability topics. <p>For the 2018 report we included these topics, with a focus on the revised sustainability strategy. This strategy incorporates the majority of material topics related to sustainability.</p>
102-48	a. The effect of any restatements of information given in previous reports, and the reasons for such restatements.	We improved processes for collecting fuel oil metrics in 2017 and therefore used 2017 as our baseline for energy and emissions metrics in this 2018 report.
102-49	a. Significant changes from previous reporting periods in the list of material topics and topic boundaries.	Within this year's disclosure, we have added responses to indicators, but there were not changes in Aptar's material topics.
102-50	a. Reporting period for the information provided.	This report covers activities from January 1, 2018 to December 31, 2018 unless otherwise noted.
102-51	a. If applicable, the date of the most recent previous report.	21-Jun-17
102-52	a. Reporting cycle.	Annual
102-53	a. The contact point for questions regarding the report or its contents.	Beth Holland Vice President, Operational Excellence – Environment, Health and Safety & Sustainability Beth.Holland@aptar.com

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 102 General Disclosures

102-54	a. The claim made by the organization, if it has prepared a report in accordance with the GRI Standards, either: <ol style="list-style-type: none"> i. 'This report has been prepared in accordance with the GRI Standards: Core option'; ii. 'This report has been prepared in accordance with the GRI Standards: Comprehensive option'. 	This report has been prepared in accordance with the GRI Standards: Core options. See GRI 102-56 below for assurance information.
102-55	a. The GRI content index, which specifies each of the GRI Standards used and lists all disclosures included in the report. b. For each disclosure, the content index shall include: <ol style="list-style-type: none"> i. The number of the disclosure (for disclosures covered by the GRI Standards); ii. The page number(s) or URL(s) where the information can be found, either within the report or in other published materials; iii. If applicable, and where permitted, the reason(s) for omission when a required disclosure cannot be made. 	Please refer to the Table of Contents of this GRI Index. We have made every attempt to report all required disclosures and only omit information where we do not have systems in place to collect the data as is requested.
102-56	a. A description of the organization's policy and current practice with regard to seeking external assurance for the report. b. If the report has been externally assured: <ol style="list-style-type: none"> i. A reference to the external assurance report, statements, or opinions. If not included in the assurance report accompanying the sustainability report, a description of what has and what has not been assured and on what basis, including the assurance standards used, the level of assurance obtained and any limitations of the assurance process; ii. The relationship between the organization and the assurance provider; iii. Whether and how the highest governance body or senior executives are involved in seeking external assurance for the organization's sustainability report. 	<p>About This Report</p> <p>In addition to the energy and emissions data that was externally verified, all report information was reviewed by Aptar's Vice President of Operational Excellence, Operational Excellence EHS & Sustainability Regional Leaders, Aptar's Vice President of Investor Relations and other functional leaders throughout the organization.</p> <p>Assurance statements from ERM CVS can be found here:</p> <ul style="list-style-type: none"> > 2018 Assurance Statement for Absolute Energy, Scope 1 & 2 Emissions and Renewable Energy > 2018 Assurance Statement for Scope 1 & 2 (Location and Market Based) CO₂ Emissions

200 Economic Disclosures

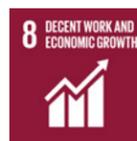
TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
GRI 201 Economic Disclosures		

Management Approach

The reporting organization shall report its management approach for economic performance using GRI 103: Management Approach.

As a public company, we are required to report our results and file them with the U.S. Securities and Exchange Commission. We issue annual and quarterly financial statements that are filed publicly. Public financial statements are prepared on the accrual basis Generally Accepted Accounting Principles. We maintain processes and controls to collect, summarize and report financial transactions. Our processes and controls also support our tax filing requirements. We file annual tax returns for each legal entity or reporting group. The basis for reporting on our tax returns vary by jurisdiction.

201-1	<p>a. Direct economic value generated and distributed (EVG&D) on an accruals basis, including the basic components for the organization's global operations as listed below. If data are presented on a cash basis, report the justification for this decision in addition to reporting the following basic components:</p> <ul style="list-style-type: none"> i. Direct economic value generated: revenues; ii. Economic value distributed: operating costs, employee wages and benefits, payments to providers of capital, payments to government by country and community investments; iii. Economic value retained: 'direct economic value generated' less 'economic value distributed'. <p>b. Where significant, report EVG&D separately at country, regional or market levels and the criteria used for defining significance.</p>	<p>a. AptarGroup 2018 Annual Report (PDF: page 45) filed February 21, 2019</p> <ul style="list-style-type: none"> i. AptarGroup 2018 Annual Report (PDF: page 45) filed February 21, 2019 ii. AptarGroup 2018 Annual Report (PDF: page 45) filed February 21, 2019 iii. AptarGroup 2018 Annual Report (PDF: page 45) filed February 21, 2019 <p>b. We collect and evaluate this information, but we do not publicly disclose.</p>
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TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
GRI 201 Economic Disclosures		

201-2	<p>a. Risks and opportunities posed by climate change that have the potential to generate substantive changes in operations, revenue or expenditure, including:</p> <ul style="list-style-type: none"> i. A description of the risk or opportunity and its classification as either physical, regulatory or other; ii. A description of the impact associated with the risk or opportunity; iii. The financial implications of the risk or opportunity before action is taken; iv. The methods used to manage the risk or opportunity; v. The costs of actions taken to manage the risk or opportunity. 	<p>Aptar responds to the CDP Climate Change questionnaire on an annual basis. Detailed information about our risks and opportunities posed by climate change are included within our response.</p>
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201-3	<p>a. If the benefit plan obligations and other retirement plan's liabilities are met by the organization's general resources, the estimated value of those liabilities.</p> <p>b. If a separate fund exists to pay the plan's pension liabilities:</p> <ul style="list-style-type: none"> i. The extent to which the scheme's liabilities are estimated to be covered by the assets that have been set aside to meet them; ii. The basis on which that estimate has been arrived at; iii. When that estimate was made. <p>c. If a fund set up to pay the plan's pension liabilities is not fully covered, explain the strategy, if any, adopted by the employer to work towards full coverage, and the timescale, if any, by which the employer hopes to achieve full coverage.</p> <p>d. Percentage of salary contributed by employee or employer.</p> <p>e. Level of participation in retirement plans, such as participation in mandatory or voluntary schemes, regional or country-based schemes, or those with financial impact.</p>	<p>a. AptarGroup 2018 Annual Report (PDF: page 66-67) filed February 21, 2019</p> <p>b. AptarGroup 2018 Annual Report (PDF: page 67) filed February 21, 2019</p> <ul style="list-style-type: none"> i. AptarGroup 2018 Annual Report (PDF: page 67) filed February 21, 2019 ii. AptarGroup 2018 Annual Report (PDF: page 69) filed February 21, 2019 iii. As of December 31, 2018. <p>c. We maintain our funding within the legal threshold.</p> <p>d. Our form 11-K is an annual report of employee stock purchase, savings and similar plans. The 11-K for reporting year 2017 was filed on June 13, 2018. The 11-K for reporting year 2018 is scheduled to be filed near the end of Q2 2019.</p> <p>e. We do not currently have mechanisms in place to be able to report the level of participation in retirement plans.</p>
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TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
GRI 201 Economic Disclosures		
201-4	<p>a. Total monetary value of financial assistance received by the organization from any government during the reporting period, including:</p> <ul style="list-style-type: none"> i. Tax relief and tax credits; ii. Subsidies; iii. Investment grants, research and development grants and other relevant types of grant; iv. Awards; v. Royalty holidays; vi. Financial assistance from Export Credit Agencies (ECAs); vii. Financial incentives; viii. Other financial benefits received or receivable from any government for any operation. <p>b. The information in 201-4-a by country.</p> <p>c. Whether, and the extent to which, any government is present in the shareholding structure.</p>	<p>a-i. Tax credits estimated to be received for 2018 from various states and countries (listed in b below) = \$13,218,000</p> <ul style="list-style-type: none"> ii. Not applicable iii. Investment and other incentive grants estimated to be received for 2018 = \$182,000 iv. Not applicable v. Not applicable vi. Not applicable vii. Not applicable viii. Not applicable <p>b. U.S.A., specifically the states of CT, IL, NC, NY, WI; and France. Please see Table 201-4 below.</p> <p>c. Not applicable</p>



TABLE 201-4 Summary of State Tax Credits and Incentives

TYPE	Amount by State					Total U.S.A.	France	Global Total
	CT	IL	NC	NY	WI			
Human Capital/ Payroll Tax Credits	2,000					2,000	5,069,000	5,071,000
Electronic Data Processing	11,000					11,000		11,000
Fixed Capital Investment Credit	59,000	57,000	10,000	34,000		160,000		160,000
Research & Development Tax Credit	16,000	3,000			80,000	99,000	7,839,000	7,938,000
Manufacturing Sales Tax Credit					38,000	38,000		38,000
Total Tax Credits	88,000	60,000	10,000	34,000	118,000	310,000	12,908,000	13,218,000
Recharge Credit				27,000				
Empire State Development – Excelsior Jobs Credit				22,000				
Illinois EDGE Credit								
North Carolina JDIG Credit			133,000					
Incentive Tax Credits			133,000	49,000		182,000		182,000
Grand Totals	88,000	60,000	143,000	83,000	118,000	492,000	12,908,000	13,400,000



TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 204 Procurement Practices

Management Approach

The reporting organization shall report its management approach for procurement practices using GRI 103: Management Approach.

Aptar's number one commodity spend is on resin. In 2017, resin purchases accounted for approximately 13 percent of our total annual purchasing spend and in 2018, resin purchases accounted for approximately 16 percent of annual purchasing spend. For this reason we are providing our response with regard to resin purchases only, which we believe will give a representative picture of the overall purchasing strategy. Aptar's purchasing strategy, consistent with Aptar's reporting alignment, considers four main regions: North America, Europe, Latin America and Asia (including China, India, Indonesia and Thailand).

204-1	<p>a. Percentage of the procurement budget used for significant locations of operation that is spent on suppliers local to that operation (such as percentage of products and services purchased locally).</p> <p>b. The organization's geographical definition of 'local'.</p> <p>c. The definition used for 'significant locations of operation'.</p>	<p>a. Please see Table 204-1 on the following page.</p> <p>b. When we designate a spend as 'local' we mean that we are purchasing from a supplier that is located within the same region as the Aptar production facility that is originating the purchase. The majority of resin purchases are local.</p> <p>c. We consider all of our manufacturing facilities significant locations of operation.</p>
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TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 205 Anti-Corruption

Management Approach

The reporting organization shall report its management approach for anti-corruption using GRI 103: Management Approach.

Aptar has several alternatives for reporting allegations of corruption. First, Aptar has an independent third-party SAAS whistleblower hotline. This hotline allows users to report allegations across the globe in many different languages. Users have the ability to report anonymously. Second, employees also have the ability to report allegations of corruption through Aptar's Compliance Officers. Third, employees can report allegations of corruption through their managers or through their local human resources department. Fourth, employees can report allegations of corruption to the Audit Committee Chairman (contact info is listed in Aptar's Compliance Manual).

205-1	<p>a. Total number and percentage of operations assessed for risks related to corruption.</p> <p>b. Significant risks related to corruption identified through the risk assessment.</p>	<p>a. Our operations are assessed for risks related to corruption through screening and due-diligence.</p> <p>b. Our operations are assessed for risks related to corruption through screening and due-diligence.</p>
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TABLE 204-1 Resin Procurement Practices

REGION	APTAR FACILITY	VENDOR COUNTRY	% OF APTAR'S 2018 TOTAL RESIN SPEND	% OF APTAR'S 2018 TOTAL RESIN VOLUME
LATAM	Aptar Berazategui	Argentina	0.03	0.01
LATAM	Aptar Berazategui	U.S.A.	0.09	0.10
LATAM	Aptar Cajamar	Brazil	0.24	0.07
US	Aptar Cary South	Belgium	0.10	0.12
US	Aptar Cary South	U.S.A.	2.67	2.27
EMEA	Aptar Chieti	Austria	0.42	0.50
EMEA	Aptar Chieti	Belgium	0.04	0.05
EMEA	Aptar Chieti	Finland	0.02	0.02
EMEA	Aptar Chieti	Germany	1.73	2.13
EMEA	Aptar Chieti	Italy	0.03	0.03
EMEA	Aptar Chieti	Netherlands	0.37	0.41
EMEA	Aptar Čkyně	Austria	1.13	1.39
EMEA	Aptar Čkyně	Belgium	1.40	1.57
EMEA	Aptar Čkyně	Netherlands	0.41	0.47
EMEA	Aptar Čkyně	Switzerland	0.40	0.06
EMEA	Aptar Čkyně	United Kingdom	0.17	0.19
EMEA	Aptar Dortmund	Austria	0.27	0.34
EMEA	Aptar Dortmund	Belgium	0.04	0.05
EMEA	Aptar Dortmund	Netherlands	0.52	0.50
EMEA	Aptar Dortmund	Netherlands	0.05	0.06
EMEA	Aptar Dortmund	South Korea	0.00	0.00
US	Aptar Eatontown	U.S.A.	0.02	0.00
EMEA	Aptar Freyung	Austria	6.77	8.13
EMEA	Aptar Freyung	Germany	2.43	2.80
ASIA	Aptar India - Hyderabad	India	0.37	0.49
ASIA	Aptar India - Hyderabad	Singapore	0.02	0.02
EMEA	Aptar Le Neubourg	U.S.A.	0.00	0.00
EMEA	Aptar Le Neubourg	France	2.34	1.44
EMEA	Aptar Le Neubourg	Germany	0.73	0.43
EMEA	Aptar Le Vaudreuil	Austria	0.00	0.00
EMEA	Aptar Le Vaudreuil	Belgium	0.37	0.39
EMEA	Aptar Le Vaudreuil	France	2.53	2.03
EMEA	Aptar Le Vaudreuil	Germany	1.92	0.50
EMEA	Aptar Le Vaudreuil	Italy	0.15	0.14
EMEA	Aptar Le Vaudreuil	Netherlands	0.38	0.16
EMEA	Aptar Le Vaudreuil	Switzerland	1.40	0.51
EMEA	Aptar Leeds	Netherlands	1.08	1.26
EMEA	Aptar Leeds	United Kingdom	1.66	2.00
US	Aptar Libertyville	U.S.A.	2.73	2.96
US	Aptar Lincolnnton	U.S.A.	7.79	8.25
LATAM	Aptar Maringá	Brazil	0.94	0.96
LATAM	Aptar Maringá	U.S.A.	0.03	0.03
US	Aptar McHenry	U.S.A.	1.34	1.46
EMEA	Aptar Menden	Germany	1.88	2.08
EMEA	Aptar Menden	Netherlands	0.09	0.11
EMEA	Aptar Mezzovico	Austria	0.03	0.03
EMEA	Aptar Mezzovico	Belgium	0.27	0.29
EMEA	Aptar Mezzovico	Italy	0.01	0.01
EMEA	Aptar Mezzovico	Netherlands	0.11	0.11
US	Aptar Midland	U.S.A.	1.77	0.01
US	Aptar Mukwonago	U.S.A.	17.28	18.12
EMEA	Aptar Oyonnax	Austria	0.00	0.00
EMEA	Aptar Oyonnax	France	2.80	1.77

REGION	APTAR FACILITY	VENDOR COUNTRY	% OF APTAR'S 2018 TOTAL RESIN SPEND	% OF APTAR'S 2018 TOTAL RESIN VOLUME
EMEA	Aptar Oyonnax	Germany	0.06	0.02
EMEA	Aptar Oyonnax	Netherlands	0.11	0.12
EMEA	Aptar Oyonnax	Switzerland	0.54	0.18
EMEA	Aptar Pescara	Austria	0.21	0.25
EMEA	Aptar Pescara	Belgium	0.50	0.55
EMEA	Aptar Pescara	Finland	0.14	0.11
EMEA	Aptar Pescara	Germany	0.93	1.05
EMEA	Aptar Pescara	Italy	0.43	0.31
EMEA	Aptar Pescara	Netherlands	0.89	0.94
EMEA	Aptar Pescara	Switzerland	0.14	0.06
EMEA	Aptar Pescara	U.S.A.	0.10	0.11
EMEA	Aptar Poincy	France	0.34	0.36
EMEA	Aptar Poincy	Germany	0.96	1.20
EMEA	Aptar Poincy	Netherlands	1.73	1.86
LATAM	Aptar Querétaro	Austria	0.34	0.36
LATAM	Aptar Querétaro	Mexico	3.37	3.32
LATAM	Aptar Querétaro	U.S.A.	1.13	1.19
EMEA	Aptar Radolfzell - Böhringen	Austria	0.21	0.23
EMEA	Aptar Radolfzell - Böhringen	Belgium	0.03	0.03
EMEA	Aptar Radolfzell - Böhringen	Germany	0.02	0.02
EMEA	Aptar Radolfzell - Böhringen	Netherlands	0.00	0.00
EMEA	Aptar Radolfzell - Böhringen	Switzerland	0.02	0.02
EMEA	Aptar Radolfzell - Eigeltingen	Austria	0.14	0.15
EMEA	Aptar Radolfzell - Eigeltingen	Belgium	1.43	1.52
EMEA	Aptar Radolfzell - Eigeltingen	Denmark	0.00	0.00
EMEA	Aptar Radolfzell - Eigeltingen	Germany	0.41	0.17
EMEA	Aptar Radolfzell - Eigeltingen	Netherlands	0.39	0.39
US	Aptar Stratford	Belgium	0.08	0.10
US	Aptar Stratford	U.S.A.	0.60	0.53
ASIA	Aptar Suzhou - B+H/F+B	China	0.66	0.59
ASIA	Aptar Suzhou - B+H/F+B	France	0.01	0.00
ASIA	Aptar Suzhou - B+H/F+B	Hong Kong	5.56	7.30
ASIA	Aptar Suzhou - B+H/F+B	Italy	0.09	0.09
ASIA	Aptar Suzhou - B+H/F+B	U.S.A.	0.04	0.04
ASIA	Aptar Suzhou - Pharma	China	0.03	0.03
ASIA	Aptar Suzhou - Pharma	Hong Kong	0.03	0.04
ASIA	Aptar Suzhou - Pharma	Italy	0.03	0.02
EMEA	Aptar Torelló	Austria	0.28	0.33
EMEA	Aptar Torelló	Belgium	0.06	0.06
EMEA	Aptar Torelló	Netherlands	0.04	0.04
EMEA	Aptar Torelló	Spain	0.48	0.59
US	Aptar Torrington	U.S.A.	1.02	0.96
LATAM	Aptar Tortuguitas	Argentina	1.27	1.43
LATAM	Aptar Tortuguitas	Brazil	0.08	0.09
EMEA	Aptar Val de Reuil	France	0.00	0.00
EMEA	Aptar Verneuill	France	0.51	0.41
EMEA	Aptar Verneuill	Germany	0.29	0.33
EMEA	Aptar Villingen - Herdenen	France	0.01	0.00
EMEA	Aptar Villingen - Herdenen	Germany	0.58	0.50
EMEA	Aptar Villingen - Herdenen	Netherlands	2.23	2.55
EMEA	Aptar Vladimir	Austria	1.76	2.21
EMEA	Aptar Vladimir	Belgium	0.23	0.26
EMEA	Aptar Vladimir	Russian Fed.	0.12	0.16
APTAR GLOBAL TOTAL			100.00	100.00

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 205 Anti-Corruption

- 205-2**
- a. Total number and percentage of governance body members that the organization's anti-corruption policies and procedures have been communicated to, broken down by region.
 - b. Total number and percentage of employees that the organization's anti-corruption policies and procedures have been communicated to, broken down by employee category and region.
 - c. Total number and percentage of business partners that the organization's anti-corruption policies and procedures have been communicated to, broken down by type of business partner and region. Describe if the organization's anti-corruption policies and procedures have been communicated to any other persons or organizations.
 - d. Total number and percentage of governance body members that have received training on anti-corruption, broken down by region.
 - e. Total number and percentage of employees that have received training on anti-corruption, broken down by employee category and region.

Please see **Table 205-2** below.

This chart illustrates the total number and percentage of governance body members and targeted employees to which the organization's anti-corruption policies and procedures have been communicated, as broken down by region. We provided training on anti-corruption policies by means of presentations and through an eLearning platform.

eLearning is a mandatory prerequisite for Aptar's face-to-face anti-corruption training. In 2018, this training was under development and was not deployed pending improvements that will launch in 2019, resulting in a low percentage of face-to-face training completion.



TABLE 205-2 Anti-corruption training

METRIC	SOURCE	2018								2017								
		Asia (includes India, Indonesia, Thailand, China and Japan)		Continental Europe (includes Switzerland and Russia)		Latin America (includes Mexico)		North America		Asia (includes India, Indonesia, Thailand, China and Japan)		Continental Europe (includes Switzerland and Russia)		Latin America (includes Mexico)		North America		
		TOTAL #	%	TOTAL #	%	TOTAL #	%	TOTAL #	%	TOTAL #	%	TOTAL #	%	TOTAL #	%	TOTAL #	%	
Governance body members that anti-corruption policies and procedures have been communicated to	Communication occurs every year	5	100	17	100	2	100	8	100	Communication occurred in 2015	2	100	8	100	2	100	12	100
Governance body members that have received training on anti-corruption	Face-to-face training	2	100	-	-	-	-	-	-	Training occurred in 2015	2	100	7	87	1	50	9	75
Employees that Aptar's anti-corruption policies and procedures have been communicated to	Communication occurs every year	333	100	1,766	100	321	100	687	100	eLearning participants in 2015	263	100	1,351	100	280	100	502	100
Employees that have received training on anti-corruption	Face-to-face training (mandatory eLearning will be deployed in 2019)	166	50	98	13	-	-	199	29	eLearning participants in 2015	261	100	1,323	98	260	93	489	97

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 205 Anti-Corruption

205-3	<p>a. Total number and nature of confirmed incidents of corruption.</p> <p>b. Total number of confirmed incidents in which employees were dismissed or disciplined for corruption.</p> <p>c. Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption.</p> <p>d. Public legal cases regarding corruption brought against the organization or its employees during the reporting period and the outcomes of such cases.</p>	<p>a. Aptar does not have any confirmed incidents of corruption.</p> <p>b. Aptar does not have any confirmed incidents in which employees were dismissed or disciplined for corruption.</p> <p>c. Aptar does not have any confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption.</p> <p>d. Aptar does not have any public legal cases regarding corruption brought against the organization or its employees during the reporting period.</p>
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TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 206 Anti-Competitive Behavior

	<p>Management Approach</p> <p>The reporting organization shall report its management approach for anti-competitive behavior using GRI 103: Management Approach.</p>	<p>Aptar has several alternatives for reporting allegations of anti-competitive behavior. First, Aptar has an independent third-party SAAS whistleblower hotline. This hotline allows users to report allegations across the globe in many different languages. Users have the ability to report anonymously. Second, employees also have the ability to report allegations of anti-competitive behavior through Aptar's Compliance Officers. Third, employees can report allegations of anti-competitive behavior through their managers or through their local human resources department. Finally, employees can report allegations of anti-competitive behavior to the Audit Committee Chairman (contact info is listed in Aptar's Compliance Manual).</p>
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206-1	<p>a. Number of legal actions pending or completed during the reporting period regarding anti-competitive behavior and violations of anti-trust and monopoly legislation in which the organization has been identified as a participant.</p> <p>b. Main outcomes of completed legal actions, including any decisions or judgments.</p>	<p>a. Aptar does not have any legal actions pending or completed regarding anti-competitive behavior or violations of anti-trust and monopoly legislation.</p> <p>b. Not applicable</p>
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300 Environmental Topics

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 301 Materials

Management Approach

The reporting organization shall report its management approach for materials using GRI 103: Management Approach.

Resin continues to be an important material, accounting for 16 percent of our purchasing spend, however recent focus has shifted to more sustainable resin offerings. Sustainable material investigations play an increasingly important role in researching and developing new resins for packaging. Under our new sustainability strategy, material changes fall under the Product Sustainability Team. Information on our material journey for post-consumer resin can be found on [page 17](#) of this report and information on the targets and strategy of our Product Sustainability Team can be found on [page 15](#).

Throughout year 2018, we tested sustainable materials on several products both independently and in partnership with various customers and we qualified:

- > Bio-plastic and PCR for the dispenser GS and GSA (different closures, actuators and options);
- > Post consumer recycled resin for different closures and spray pump produced in North America;
- > We defined target stock products to extend the use of PCR in our product portfolio (closures Snap Top, Bravo, Squeeze and Turn, pumps PZ Lark, Evo Classic, PZ1 and PZ2 and several aerosol actuators).

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 302 Energy

Management Approach

The reporting organization shall report its management approach for energy using GRI 103: Management Approach.

Aptar uses an SAP-based Business Intelligence module to track energy, waste and water metrics. All manufacturing facilities and warehouses are required to report these metrics on a monthly basis, and are given a lag period of one month plus five days to submit figures. Metrics are reported according to Aptar definitions and using utility invoices and purchasing records. At least quarterly the information is reviewed at the corporate level with the baseline year being 2016. Energy targets are incorporated into performance plans at several levels of the business, including those of our Segment Presidents.

Aptar tracks environmental metrics for all manufacturing facilities, warehouses and joint ventures in which Aptar holds 51 percent or greater ownership. We do not currently require our office locations in Crystal Lake, IL U.S.A., Louveciennes, France or Milton Keynes, UK to report environmental metrics through the SAP BI system. Further, we do not require our research and development lab in Baltimore, Maryland U.S.A. to report because that lab is a small room in a larger building. Aptar Next Breath (Baltimore) consumption values are very minimal compared to Aptar global values, and we cannot currently isolate their metrics because of the building structure.

During year 2018, Aptar recalculated GHGs based on Scope 2 – Location and Market based considering corrections for the intensity and absolute carbon emissions due to additional information received from our site Aptar Leeds (due to energy consumption coming from buildings not included in the previous year). In addition, Aptar needed to re-establish baseline values 2018 to account for the additional consumption related also to the CSP Technology sites in response to the acquisition.

During year 2018 Aptar launched a new project in order to improve the data management of operational eco-efficiency sustainability metrics into the EHStar tool considering the addition of appropriate section for graphics and charts. With this new system, launching in 2019, all Aptar locations, including offices and labs, will report energy and emissions metrics.

In 2018, Aptar saw reductions in absolute and intensity carbon emissions versus the 2017 baseline.

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 302 Energy

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
302-1	<p>a. Total fuel consumption within the organization from non-renewable sources, in joules or multiples and including fuel types used.</p> <p>b. Total fuel consumption within the organization from renewable sources, in joules or multiples, and including fuel types used.</p> <p>c. In joules, watt-hours or multiples, the total:</p> <ol style="list-style-type: none"> Electricity consumption Heating consumption Cooling consumption Steam consumption <p>d. In joules, watt-hours or multiples, the total:</p> <ol style="list-style-type: none"> Electricity sold Heating sold Cooling sold Steam sold <p>e. Total energy consumption within the organization, in joules or multiples.</p> <p>f. Standards, methodologies, assumptions, and/or calculation tools used.</p> <p>g. Source of the conversion factors used.</p>	<p>In 2018, we continued to use our SAP BI metrics collection system. The system presents the additional categories of fuel oil and refrigerants. Conversion factors are based on DEFRA database version 2018. Most of the conversion factors used are prepopulated standards within the SAP system (based on US Energy Information Administration). Energy specific emissions factors, in according GHGs, are based on the International Energy Agency report (version 2018 - based on AR5 report from IPCC), RE-DISS II (version 2018), e-GRID (version 2016) and were reviewed as part of the third-party data verification activities. A chart showing our renewable electricity sources is given on page 47. Please see Table 302-1 below for absolute energy consumption.</p> <p>We did not achieve absolute (-2.5 percent) or intensity (-10 percent) targets for 2018 total energy consumption as compared to our baseline year, 2017.</p> <p>In many sites we have added new product lines, which are consuming more energy than previous years. However, the intensity values, normalized to invoiced quantities, do not immediately reflect the progress in our operations, as there is a lag from the time the line is running until we actually sell and invoice product.</p> <p>Further, we improved processes for collecting fuel oil metrics again in 2018 and so we must restate our baseline again considering this new knowledge and the recent acquisitions of Reboul and CSP Technologies. This will be a consideration as we identify our Science Based Targets, which must be finalized by year-end 2020.</p>



TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 302 Energy

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
302-2	<p>a. Energy consumption outside of the organization, in joules or multiples.</p> <p>b. Standards, methodologies, assumptions, and/or calculation tools used.</p> <p>c. Source of the conversion factors used.</p>	<p>Aptar responds to the CDP Climate Change questionnaire on an annual basis. Information about energy consumption outside of the organization are included within our response.</p>
302-3	<p>a. Energy intensity ratio for the organization.</p> <p>b. Organization-specific metric (the denominator) chosen to calculate the ratio.</p> <p>c. Types of energy included in the intensity ratio; whether fuel, electricity, heating, cooling, steam, or all.</p> <p>d. Whether the ratio uses energy consumption within the organization, outside of it or both.</p>	<p>a. Please see Table 302-3 below. As mentioned in GRI 302-1, we did not achieve absolute (-2.5 percent) or intensity (-10 percent) targets for 2018 total energy consumption as compared to our baseline year, 2017.</p> <p>b. All energy metrics are currently normalized to quantities of parts invoiced. Within our CDP Climate Change response, we also normalize by revenue and Full Time Equivalents (FTEs). Accuracy of Invoiced Quantities reported through the metrics collection system is approximately +/-5 percent. Invoiced Quantities for Aptar Brecey and Granville are added to totals by submitting a request for service ticket to the Information Systems helpdesk, ServiceNow.</p> <p>c. Aptar considers total energy consumption to be electricity + fuel oil + natural gas.</p> <p>d. For the purpose of our total energy consumption calculations, we consider energy consumption within the organization.</p>



TABLE 302-1 Absolute Energy Consumption (KWH)

	% VARIATION 2018 VERSUS BASE 2017	% VARIATION 2018 VERSUS 2016	2018	2017	2016
Electricity (renewable)	28	48	225,995,916	176,911,461	152,276,737
Electricity (non-renewable)	-8	-19	283,658,638	309,437,508	348,608,693
TOTAL ELECTRICITY	5	2	509,654,554	486,348,969	500,885,430
Natural gas	6	0	73,638,448	69,406,960	73,764,903
Fuels	70	248	24,032,584	14,124,157	6,907,351
TOTAL ENERGY CONSUMPTION (absolute)	7	4	607,325,586	569,880,085	581,557,683

TABLE 302-3 Intensity Energy Consumption (KWH/IQ(TH))

	% VARIATION 2018 VERSUS BASE 2017	% VARIATION 2018 VERSUS 2016	2018	2017	2016
Electricity (renewable) intensity	24	35	4.57	3.68	3.38
Electricity (non-renewable) intensity	-11	-26	5.74	6.43	7.74
TOTAL ELECTRICITY INTENSITY	2	-7	10.31	10.11	11.12
Natural gas intensity	3	-9	1.49	1.44	1.64
Fuels intensity	66	217	0.49	0.29	0.15
TOTAL ENERGY CONSUMPTION (intensity)	4	-5	12.3	11.8	12.9

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 303 Water

Management Approach

The reporting organization shall report its management approach for water using GRI 103: Management Approach.



Water is not identified as a material indicator by our stakeholders, nor is it a key raw material component in our processes. Nevertheless, we do collect withdrawal and discharge water metrics from all sites on a monthly basis and report this information in the CDP Water questionnaire. For reporting year 2017, data for which was reported in 2018, we received a "C" letter grade on our CDP water response. With the new EHStar metrics module, our ability to manage water consumption and report our progress will improve in 2019. Readers are invited to learn more about our water programs within our responses.

303-1	<p>a. Total volume of water withdrawn, with a breakdown by the following sources:</p> <ul style="list-style-type: none"> i. Surface water, including water from wetlands, rivers, lakes and oceans; ii. Ground water; iii. Rainwater collected directly and stored by the organization; iv. Waste water from another organization; v. Municipal water supplies or other public or private water utilities. <p>b. Standards, methodologies and assumptions used.</p>	<p>Aptar responds to the CDP water questionnaire on an annual basis. Information about water consumption is included within our response.</p>
303-2	<p>a. Total number of water sources significantly affected by withdrawal by type:</p> <ul style="list-style-type: none"> i. Size of the water source; ii. Whether the source is designated as a nationally or internationally protected area; iii. Biodiversity value (such as species diversity and endemism, and total number of protected species); iv. Value or importance of the water source to local communities and indigenous peoples. <p>b. Standards, methodologies and assumptions used.</p>	<p>Aptar responds to the CDP water questionnaire on an annual basis. Information about water consumption is included within our response.</p>
303-5	<p>Total water consumption from all areas in megaliters.</p> <ul style="list-style-type: none"> b. Total water consumption from all areas with water stress in megaliters. c. Change in water storage in megaliters, if water storage has been identified as having a significant water-related impact. d. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies and assumptions used, including whether the information is calculated, estimated, modeled, or sourced from direct measurements, and the approach taken for this, such as the use of any sector-specific factors. 	<p>Aptar responds to the CDP water questionnaire on an annual basis. Information about water consumption is included within our response.</p>

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 304 Biodiversity

Management Approach

The reporting organization shall report its management approach for water using GRI 103: Management Approach.

Our sustainable commitments play an increasingly important role on the protection of biodiversity. In 2018, Aptar continued the investigation of the environmental impact of our production processes on biodiversity, both terrestrial and freshwater. The use of Life Cycle approaches allowed us to quantify these impacts linked to the use of our main inputs (electrical energy, natural gas and fuels oil) used in direct activities. The use of life cycle impact assessment methodology, included in the appropriate LCA tool, allowed the identification of environmental impact indicator for the biodiversity protection.

304-1	<p>Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas</p>	<p>This information is not currently available.</p>
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TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 304 Biodiversity

304-2	Significant impacts of activities, products, and services on biodiversity	Aptar identified and quantified the impact on the terrestrial and freshwater ecosystem due to climate change effects for the production of electrical energy, fuels and natural gas used in our direct processes. The impact assessment methodology used is ReCiPe (version 2016) and where possible, the identification of the ecosystem quality expressed as 'local species loss integrated over time (species year)'. This information can be found in Table 304-2 below. Biodiversity is not currently a material indicator for Aptar, and based on our current assessments, damage to species based on climate change is low.
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TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 304 Biodiversity

304-3	<ul style="list-style-type: none"> a. Size and location of all habitat areas protected or restored, and whether the success of the restoration measure was or is approved by independent external professionals. b. Whether partnerships exist with third parties to protect or restore habitat areas distinct from where the organization has overseen and implemented restoration or protection measures. c. Status of each area based on its condition at the close of the reporting period. d. Standards, methodologies, and assumptions used. 	Aptar currently does not protect or restore any habitat areas or work with any partnerships focused on implementing restoration of protection measures.
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TABLE 304-2 Damage To Ecosystems – Climate Change

INPUT USED BY APTAR PROCESSES	TOTAL KWH	DAMAGE TO FRESHWATER SPECIES		DAMAGE TO TERRESTRIAL SPECIES		TOTAL DAMAGE TO SPECIES (Species.yr)
		Species.yr/kWh	Total impact (species.yr)	Species.yr/kWh	Total impact (species.yr)	
Electrical energy (renewable source: hydropower): FR	141,898,135	4.96E-16	7.04E-08	1.81E-11	2.57E-03	2.57E-03
Electrical energy (renewable source: windpower): IR	6,914,523	6.63E-16	4.58E-09	2.43E-11	1.68E-04	1.68E-04
Electrical energy (non renewable source): IT	23,813,692	5.24E-14	1.25E-06	1.92E-11	4.57E-04	4.58E-04
Electrical energy (renewable source: hydropower): DE	20,755,740	4.61E-16	9.57E-09	1.69E-11	3.51E-04	3.51E-04
Electrical energy (renewable source: hydropower): CH	2,643,177	5.07E-16	1.34E-09	1.85E-11	4.89E-05	4.89E-05
Electrical energy (non renewable source): ES	5,527,827	2.67E-14	1.48E-07	9.76E-10	5.40E-03	5.40E-03
Electrical energy (non renewable source): DE	50,395,434	4.75E-14	2.39E-06	1.74E-09	8.77E-02	8.77E-02
Electrical energy (non renewable source): UK	9,115,594	4.12E-14	3.76E-07	1.51E-09	1.38E-02	1.38E-02
Electrical energy (non renewable source): CZK	11,946,803	5.31E-14	6.34E-07	1.94E-09	2.32E-02	2.32E-02
Electrical energy (non renewable source): U.S.A.	95,116,233	4.79E-14	4.56E-06	1.75E-09	1.66E-01	1.66E-01
Electrical energy (renewable source: windpower): U.S.A.	34,783,468	6.63E-16	2.31E-08	2.43E-11	8.45E-04	8.45E-04
Electrical energy (non renewable source): Mexico	20,049,120	Not available	Not available	Not available	Not available	Not available
Electrical energy (non renewable source): Argentina	7,044,391	Not available	Not available	Not available	Not available	Not available
Electrical energy (non renewable source): Colombia	579,675	Not available	Not available	Not available	Not available	Not available
Electrical energy (non renewable source): India	6,366,009	Not available	Not available	Not available	Not available	Not available
Electrical energy (non renewable source): Thailandia	625,528	Not available	Not available	Not available	Not available	Not available
Electrical energy (non renewable source): Indonesia	558,822	Not available	Not available	Not available	Not available	Not available
Electrical energy (non renewable source): Brasil	3,013,424	Not available	Not available	Not available	Not available	Not available
Electrical energy (renewable source: windpower): Brasil	19,000,874	6.63E-16	1.26E-08	2.43E-11	4.62E-04	4.62E-04
Electrical energy (non renewable source): China	40,313,414	Not available	Not available	Not available	Not available	Not available
Electrical energy (non renewable source): Russia	9,192,672	Not available	Not available	Not available	Not available	Not available
Natural gas	73,638,448	3.73E-13	2.75E-05	1.34E-08	0.99	0.99
Fuels: gasoline	788,183	6.85E-13	5.40E-07	2.51E-08	0.02	0.02
Fuels: diesel	3,337,912	4.31E-13	1.44E-06	1.61E-08	0.05	0.05
Fuels: heating oil, industrial vehicles	19,906,490	3.81E-13	7.58E-06	1.39E-08	0.28	0.28
TOTAL						1.64

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 304 Biodiversity

304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	This information is not currently available.
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GRI 305 Emissions

Management Approach

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| <p>a. The reporting organization shall report its management approach for emissions using GRI 103: Management Approach.</p> <p>b. When reporting on GHG emissions targets, the reporting organization shall explain whether offsets were used to meet the targets, including the type, amount, criteria or scheme of which the offsets are part.</p> | <p>a. In addition to the information provided in GRI 302, we calculate greenhouse gas emissions according to the accounting standards within the Greenhouse Gas Protocol. For the reporting year 2018 emissions, we have applied emissions factors from the eGRID standards, published in 2018, to our sites in the United States. We have applied factors from EU-DISS to our sites in the United Kingdom and Czech Republic. All other sites were assigned emissions factors from the DEFRA publication 2018. We have estimated emissions from refrigerants sources with information provided by a sampling of sites, each of which reported minimal releases of R134a from units such as air conditioning systems and chillers. The emissions factor applied is taken from the 5th IPCC Assessment Report of the Greenhouse Gas Protocol. Throughout 2018, Aptar worked to build a digital operational eco-efficiency metrics module in partnership with Enablon Metrics Management system. Enablon is a globally recognized EHS Management system used to efficiently improve EHS and Sustainability operation and performance, and report to stakeholders. Beginning in 2019, all Aptar sites will begin using this online metrics module to report site level consumption data each month.</p> <p>Ozone Depleting Substances are not identified as a material indicator by our stakeholders. Nevertheless, we collect data regarding refrigerants lost to the atmosphere at the site level and report consolidated information to the global level at least once annually. In 2018, we consolidated the improvements of our metrics collection system to capture refrigerant losses. The metrics collection system identifies different types of refrigerants: R22, R407C, R410, R134, R404 and "other".</p> <p>b. Aptar utilizes European Energy Certificate System (EECS) and Renewable Energy Certificates (RECs). The amount of these are disclosed in Table 305-1&2 shown to the right.</p> |
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TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 305 Emissions

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| <p>305-1</p> <p>a. Gross direct (Scope 1) GHG emissions in metric tons of CO₂ equivalent.</p> <p>b. Gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃ or all.</p> <p>c. Biogenic CO₂ emissions in metric tons of CO₂ equivalent.</p> <p>d. Base year for the calculation, if applicable, including:</p> <ul style="list-style-type: none"> i. The rationale for choosing it; ii. Emissions in the base year; iii. The context for any significant changes in emissions that triggered recalculations of base year emissions. <p>e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.</p> <p>f. Consolidation approach for emissions; whether equity share, financial control, or operational control.</p> <p>g. Standards, methodologies, assumptions, and/or calculation tools used.</p> | <p>a. Please see Table 305-1&2 below. Due mostly to renewable energy purchases, we significantly surpassed both the absolute (-3.3 percent) and intensity (-5.8 percent) targets for 2018 carbon emissions as compared to our baseline year, 2017. As stated in GRI 302-1, we improved processes for collecting fuel oil metrics again in 2018 and so we must restate our baseline again considering this new knowledge and the recent acquisitions of Rebol and CSP Technologies. This will be a consideration as we identify our Science Based Targets, which must be finalized by year-end 2020.</p> <p>b. Aptar considers GHGs emissions expressed as CO₂ equivalent</p> <p>c. Not applicable</p> <p>d. Unless noted otherwise, we consider 2017 our base year for energy and emissions data.</p> <p>e. We used the following sources for emission factors: DEFRA database (version 2018) and AR5 report from IPCC for fugitive emissions coming from refrigerants. Regarding the GWP₁₀₀, the characterization factors are in compliance with the last IPCC report (based on AR5 report).</p> <p>f. Operational control</p> <p>g. Calculations were made according to the Greenhouse Gas Protocol accounting standards.</p> |
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TABLE 305-1&2 Absolute GHGs emissions (t CO₂ eq)

GHGS EMISSIONS (TONNES CO ₂ eq)	% VARIATION 2018 VERSUS BASE 2017	% VARIATION 2018 VERSUS 2016	2018	2017	2016
Aptar location-based SCOPE 2 TOTAL	7	-7	168,528	158,155	181,737
Aptar market-based (with EECS and RECs) SCOPE 2 TOTAL	-15	-22	123,593	146,242	159,208
SCOPE 1 from natural gas	6	0	13,547	12,782	13,482
SCOPE 1 from fuels	35	232	5,638	4,188	1,699
SCOPE 1 from natural gas + fuels	13	26	19,185	16,970	15,181
SCOPE 1 refrigerants	109	75	1,334	638	760
SCOPE 1 from natural gas + fuels + refrigerants	17	29	20,518	17,608	15,941
Aptar Scope 1 + 2 TOTAL	-12	-18	144,111	163,850	175,149

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 305 Emissions

<p>305-2</p> <p>a. Gross direct (Scope 2) GHG emissions in metric tons of CO₂ equivalent.</p> <p>b. Gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃ or all.</p> <p>c. Biogenic CO₂ emissions in metric tons of CO₂ equivalent.</p> <p>d. Base year for the calculation, if applicable, including:</p> <ul style="list-style-type: none"> i. The rationale for choosing it; ii. Emissions in the base year; iii. The context for any significant changes in emissions that triggered recalculations of base year emissions. <p>e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.</p> <p>f. Consolidation approach for emissions; whether equity share, financial control, or operational control.</p> <p>g. Standards, methodologies, assumptions, and/or calculation tools used.</p>	<p>a. Please see Table 305-1&2 on previous page. We significantly surpassed both the absolute (-3.3 percent) and intensity (-5.8 percent) targets for 2018 carbon emissions as compared to our baseline year, 2017.</p> <p>b. Aptar considered GHGs emissions expressed as CO₂ equivalent</p> <p>c. Not applicable</p> <p>d. Unless noted otherwise, we consider 2017 our base year for energy and emissions data.</p> <p>e. Aptar calculates greenhouse gas emissions according to the accounting standards within the Greenhouse Gas Protocol. For the reporting year 2018 emissions, we have applied emissions factors from the eGRID2016 standards, published in 2018, to our sites in the United States. We have applied factors from RE-DISS II (version 2018) to our sites in the United Kingdom and Czech Republic. All other sites were assigned emissions factors from IEA publication (version 2018). The Global Warming Potential applied to refrigerants is from the 5th Assessment Report of IPCC</p> <p>f. Operational control.</p> <p>g. Calculations were made according to the Greenhouse Gas Protocol accounting standards.</p>
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<p>305-3</p> <p>a. Gross direct (Scope 3) GHG emissions in metric tons of CO₂ equivalent.</p>	<p>Aptar responds to the CDP Climate Change questionnaire on an annual basis. Information about our Scope 3 emissions are included within our response.</p>
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TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 305 Emissions

<p>305-4</p> <p>a. GHG emissions intensity ratio for the organization.</p> <p>b. Organization-specific metric (the denominator) chosen to calculate the ratio.</p> <p>c. Types of GHG emissions included in the intensity ratio; whether direct (Scope 1), energy indirect (Scope 2) and/or other indirect (Scope 3).</p> <p>d. Gases included in the calculation; whether CO₂, CH₄, N₂O, HFCs, PFCs, SF₆, NF₃ or all.</p>	<p>a. See Table 305-4 below. We significantly surpassed both the absolute (-3.3 percent) and intensity (-5.8 percent) targets for 2018 carbon emissions as compared to our baseline year, 2017.</p> <p>b. All environmental energy and emissions data are currently normalized to quantities of parts invoiced. Within our CDP Climate Change response, we also normalize by revenue and Full Time Equivalents (FTEs). Accuracy of Invoiced Quantities reported through the metrics collection system is approximately +/-5 percent. Invoiced Quantities for Aptar Brecey and Granville are added to totals by submitting a request for service ticket to the Information Systems helpdesk, ServiceNow.</p> <p>c. Aptar includes Scope 1 + Scope 2. We respond to the CDP Climate Change questionnaire on an annual basis. Information about the initiatives that enable us to achieve reduction in carbon emissions are included within our response.</p> <p>d. Aptar considers GHGs emissions expressed as CO₂ equivalent</p>
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<p>305-5</p> <p>a. GHG emissions reduced as a direct result of reduction initiatives, in metric tons of CO₂ equivalent.</p>	<p>a. Aptar responds to the CDP Climate Change questionnaire on an annual basis. Information about the initiatives that enable us to achieve reduction in carbon emissions are included within our response.</p>
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TABLE 305-4 Intensity carbon emissions (t CO₂ eq/IQ as thousands)

TONNES CO ₂ eq/IQ AS THOUSANDS	% VARIATION OF 2018 VERSUS BASE 2017	% VARIATION 2018 VERSUS 2016	2018	2017	2016
SCOPE 1, natural gas + fuels	10	15	0.0004	0.0004	0.0003
SCOPE 1, estimated refrigerants	103	60	2.70E-05	1.33E-05	1.69E-05
SCOPE 1, natural gas + fuels + refrigerants	13	17	0.0004	0.0004	0.0004
SCOPE 2 location-based	4	-16	0.0034	0.0033	0.0040
SCOPE 2 market-based (including EECS and RECs)	-18	-29	0.0025	0.0030	0.0035
Aptar Scope 1 + 2 TOTAL	-14	-23	0.0029	0.0034	0.0038

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 305 Emissions

305-6	a. Production, imports and exports of ODS in metric tons of CFC-11 (trichlorofluoromethane) equivalent.	Ozone Depleting Substances are not identified as a material indicator by our stakeholders. Nevertheless, we collect data regarding refrigerants lost to the atmosphere at the site level and report consolidated information to the global level at least once annually. In 2017, we consolidated the improvements of our metrics collection system to capture refrigerant losses. The metrics collection system identifies different types of refrigerants: R22, R407C, R410, R134, R404 and "other".
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305-7	a. Significant air emissions of nitrogen oxides (NOX), sulfur oxides (SOX) and others.	The emission of nitrogen oxides and sulfur oxides has been considered and calculated as CO ₂ equivalent.
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Sites with renewable electricity sources

Country	Aptar Site	Renewable source	Country	Aptar Site	Renewable source
CT, U.S.A.	Aptar Stratford	Wind Power	France	Aptar Le Vaudreuil	Hydropower
CT, U.S.A.	Aptar Torrington	Wind Power	France	Aptar Oyonnax	Hydropower
CT, U.S.A.	Aptar Philson	Wind Power	France	Aptar Poincy	Hydropower
IL, U.S.A.	Aptar Cary	Wind Power	France	Aptar Verneuil	Hydropower
IL, U.S.A.	Aptar Libertyville	Wind Power	Germany	Aptar Eigeltingen	Hydropower
NY, U.S.A.	Aptar Congers	Wind Power	Germany	Aptar Radolfzell	Hydropower
Brazil	Aptar Jundiai	Wind Power	Ireland	Aptar Ballinasloe	Hydropower
Brazil	Aptar Maringa	Wind Power	Switzerland	Aptar Mezzovico	Hydropower
France	Aptar Annecy	Wind Power			
France	Aptar Brecey	Hydropower			
France	Aptar Charleval	Hydropower			
France	Aptar Granville	Hydropower			
France	Aptar Le Neubourg	Hydropower			



Aptar's total renewable energy purchases at year-end 2018 was 44 percent, missing our 2018 target of 45 percent. For 2019, our target is to source the equivalent of 50 percent of our total energy consumption from renewable purchases. By year-end 2020, the target is to source 55 percent of our consumption from renewable sources.

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 306 Effluents and Waste

Management Approach	The reporting organization shall report its management approach for effluents and waste using GRI 103: Management Approach.	Aptar uses an SAP-based Business Intelligence module to track energy, waste and water metrics. All manufacturing facilities and warehouses are required to report these metrics on a monthly basis, and are given a lag period of one month plus five days to submit figures. Metrics are reported according to Aptar definitions and using utility invoices and purchasing records.
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The monthly data collection includes total non-hazardous waste to landfill and total hazardous waste. Records specific to each waste stream are maintained at the site level.

Throughout 2018, Aptar worked to build a digital Landfill Free metrics module in partnership with Enablon Metrics Management system. Enablon is a globally recognized EHS and Sustainability operation and performance, and report to stakeholders. The module, which was not an Enablon product offering, enables sites to track their wastes and see landfill free ratios real-time. It helps sites that are not yet certified understand how closely they are progressing toward certification.

Aptar tracks environmental metrics for all manufacturing facilities, warehouses and joint ventures in which Aptar holds 51 percent or greater ownership. We do not currently require our office locations in Crystal Lake, IL U.S.A., Louveciennes, France or Milton Keynes, UK to report environmental metrics through the SAP BI system. Further, we do not require our research and development lab in Baltimore, Maryland U.S.A. to report because that lab is a small room in a larger building. Aptar Next Breath (Baltimore) consumption values are very minimal compared to Aptar global values, and we cannot currently isolate their metrics because of the building structure.



306-1	a. Total volume of planned and unplanned water discharges.	Water is not identified as a material indicator by our stakeholders. Nevertheless, we do collect withdraw and discharge water metrics from all sites on a monthly basis and, when requested by customers, we report this information in the CDP Water questionnaire.
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TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 306 Effluents and Waste

- 306-2** a. Total weight of hazardous waste, with a breakdown by the following disposal methods where applicable:
- Reuse
 - Recycling
 - Composting
 - Recovery, including energy recovery
 - Incineration (mass burn)
 - Deep well injection
 - Landfill
 - On-site storage
 - Other (to be specified by the organization)
- b. Total weight of non-hazardous waste, with a breakdown by the following disposal methods where applicable:
- Reuse
 - Recycling
 - Composting
 - Recovery, including energy recovery
 - Incineration (mass burn)
 - Deep well injection
 - Landfill
 - On-site storage
 - Other (to be specified by the organization)
- c. How the waste disposal method has been determined:
- Disposed of directly by the organization, or otherwise directly confirmed
 - Information provided by the waste disposal contractor
 - Organizational defaults of the waste disposal contractor

Established in 2013, and based off of the Zero Waste International Alliance protocol, Aptar's internal Landfill Free program encourages the reduction, reuse and recycling of waste byproducts from our manufacturing processes. Since 2013, the program has become a focus initiative that is integrated into our global strategy.

As of year-end 2018, 26 Aptar locations had achieved landfill free certification. These sites have proven, by third-party verification audit, at least 90 percent recycle/reuse of operational wastes. Aptar actively encourages all sites to reduce waste, and aims to continue increasing the number of landfill free facilities in the future and thus, the availability of data on disposal methods. The certification program requires an on-site audit of any waste vendor that processes more than 33 percent of a facility's total waste.

In 2017 we introduced enhancements to the SAP Business Intelligence system to include the addition of more waste categories in order to align the waste categorizations to that required within our Landfill Free program.

Aptar collects data regarding waste disposal amounts from all locations globally on a monthly basis, including total non-hazardous waste to landfill and total hazardous waste. Though, we are able to provide detailed disposal method information at landfill free certified sites, where the data has been verified by a third-party, we are unable to provide this data for our non-audited sites. In addition, these records specific to each waste stream are maintained at the site level, but these details are not currently visible in the corporate metrics reporting system.

With the introduction of the digital Landfill Free metrics module mentioned in the Management Approach, there will be increased global visibility to waste and disposal records.

Please see **Table 306-2a and b** on the right for details.

TABLE 306-2a Landfill Free Ratios

APTAR SITE	COUNTRY	SUSTAINABILITY REGION	CERTIFICATION YEAR	2016 TOTAL LANDFILL FREE %	2017 TOTAL LANDFILL FREE %	2018 TOTAL LANDFILL FREE %
Radolfzell	Germany	Europe - Pharma	2018	-	-	89.9
Eigeltingen	Germany	Europe - Pharma	2018	-	-	96.9
Freyung	Germany	Europe - F+B	2018	-	-	96.8
Ballinasloe	Ireland	Europe - B+H	2017	-	94.4	94.4
Cali	Colombia	Latin America	2017	-	99.1	99.5
Cajamar	Brazil	Latin America	2016	100.0	100.0	96.4
Maringa	Brazil	Latin America	2016	100.0	99.8	99.8
Cary Campus	U.S.A., IL	North America	2016	93.2	92.1	92.1
Libertyville	U.S.A., IL	North America	2016	95.0	97.8	97.7
Lincolnton	U.S.A., NC	North America	2016	96.0	95.2	95.2
Ckyne	Czech Republic	Europe - F+B	2015	93.6	97.2	97.2
Le Neubourg	France	Europe - B+H	2015	94.0	95.8	95.8
Le Vaudreuil	France	Europe - Pharma	2015	96.0	93.9	93.9
Mezzovico	Switzerland	Europe - Pharma	2015	94.2	94.5	92.0
Queretaro	Mexico	Latin America	2015	99.0	98.8	99.6
Stratford	U.S.A., CT	North America	2015	94.0	98.9	98.9
Mukwonago	U.S.A., WI	North America	2015	94.6	97.3	97.3
Charleval	France	Europe - B+H	2014	94.9	97.7	97.7
Poincy	France	Europe - B+H	2014	94.5	94.2	94.2
Verneuil	France	Europe - B+H	2014	92.3	98.4	98.4
Dortmund	Germany	Europe - B+H	2014	99.0	99.9	99.9
Menden	Germany	Europe - B+H	2014	96.0	99.7	99.7
Chieti	Italy	Europe - B+H	2014	99.0	92.8	92.8
Pescara	Italy	Europe - B+H	2014	97.0	92.7	92.7
Torello	Spain	Europe - B+H	2014	96.1	98.0	98.1



TABLE 306-2b Landfill Free Totals (Metric Tons)

APTAR LANDFILL FREE GLOBAL TOTALS	% VARIANCE 2018 VERSUS BASE 2015	% VARIANCE 2018 VERSUS 2017	2018	2017	2016
To Disposal (Landfill)	24.62	14.22	1,234	1,080	1,210
To Recovery (Recycle)	69.62	8.62	51,613	47,515	33,626
Total	68.20	8.75	52,847	48,595	34,836

300 Environmental Topics

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 306 Effluents and Waste

306-3	a. Total number and total volume of recorded significant spills.	Aptar experienced no significant spills during the reporting year.
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306-4	a. Total weight for each of the following: i. Hazardous waste transported ii. Hazardous waste imported iii. Hazardous waste exported iv. Hazardous waste treated	Hazardous waste volumes are currently tracked at the site level. However with the introduction of the digital Landfill Free metrics module mentioned in the Management Approach, there will be increased global visibility to volumes of hazardous waste.
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306-5	a. Water bodies and related habitats that are significantly affected by water discharges and/or runoff.	Not applicable
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TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 307 Environmental Compliance

Management Approach
The reporting organization shall report its management approach for environmental compliance using GRI 103: Management Approach.

Environmental compliance is managed at the site level, in alignment with Aptar's Global EHS Management system. In 2016, a taskforce piloted an EHS compliance audit program in Mukwonago, WI, U.S.A. and Suzhou, China. The Taskforce performed an analysis to rank all Aptar manufacturing sites on risk priority. In addition, in January of 2017, Aptar identified a global leader responsible for EHS compliance.

Also in 2017, Aptar began to subscribe to the global compliance protocol offered through ENHESA. All sites are expected to use the protocol from their country/location to conduct a self-audit at least annually. Also, according to the risk priority list established in 2016, one-third of Aptar sites are audited by a third-party using the ENHESA protocol each year. Audited sites are provided an audit report and required to establish corrective actions to close each finding. Status check-in calls are conducted frequently between the Regional EHS&S leaders and the plant management as findings are closed and tracked.

In 2018 we another one-third of sites as well as incorporating an evaluation against the EHS Management System into the audit process. We also launched a module in EHStar which enables reporting, findings tracking and compliance scoring as part of the audit program. Further, we built an assessment process to align to the EHS Management system validation. Sites are required to conduct a full site audit and EHS Management assessment at least annually.

Phase I of the EHS Management System implementation included a focus on Environmental Permits, and as part of that requirement sites must maintain a permitted systems capability tracker. Findings against the EHS Management System were also sent to sites, tracked with relevant stakeholders and closed.



300 Environmental Topics

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 307 Environmental Compliance

307-1	a. Significant fines and non-monetary sanctions for non-compliance with environmental laws and/or regulations.	Aptar experienced no significant fines or non-monetary sanctions for non-compliance with environmental laws and/or regulations during the reporting year. However, as a result of the Libertyville pond remediation, detailed on page 21 , Aptar received several notices of violation. These notices were related to spill prevention and water pollution. Aptar responded to all notices, completed remediation operations and modified the site's internal plans and procedures to prevent any further contaminations.
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GRI 308 Supplier Environmental Assessment

Management Approach

The reporting organization shall report its management approach for supplier environmental assessment using GRI 103: Management Approach.

Aptar recognizes the social and environmental assessment of our suppliers to be a material aspect of business according to our stakeholders. As reported in 2015, we integrated supplier social and environmental screening into the supplier auditing process and began measuring this in North America and Europe as part of our custom-built GRI-based sustainability scorecard. In 2016, we introduced a [Sustainable Purchasing Charter](#) which is referenced in Aptar's general terms and conditions of purchase, as well as in our standard purchasing contract templates. Suppliers are asked to acknowledge and sign the agreement if they cannot provide us with a similar internal document which proves ethics and compliance standards meeting Aptar's expectations. In 2017, this charter was made available on Aptar.com in nine languages (English, French, German, Spanish, Russian, Portuguese, Italian, Chinese and Bahasa). In 2018, Aptar also began to consider the possibility of the use of an external supplier scorecard. In 2019, the Purchasing Group along with the Global Sustainability Team began investigating and benchmarking this feasibility via a proof-of-concept with EcoVadis, a third-party supplier scoring organization. In addition, Aptar uses SAP Ariba Supplier Risk to simplify risk management across the procurement process. This platform allows for end-to-end risk management by engaging suppliers, monitoring operations risks and creating a comprehensive risk profile. Ariba monitors over 200 risk types including categories of regulatory and legal compliance, environmental and social responsibility and financial and operational risks.

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 308 Supplier Environmental Assessment

308-1	a. Percentage of new suppliers that were screened using environmental criteria.	In 2016 and 2017, we piloted our supplier sustainability screening process in North America and Europe. We selected a few strategic suppliers to receive a social and environmental screening audit and all new suppliers were screened. Other regions also screen suppliers for environmental and social impacts, but these results are currently not consolidated into a global program. In early 2018, representatives of the Operational Excellence Supply Chain, Quality and EHS & Sustainability Pillars came together to plan scaling up the process into a global program. This activity continued through 2018 and will be benchmarked as a proof-of-concept program in 2019 in Partnership with EcoVadis, a third-party supplier scoring organization, in an effort to establish a screening method for future years.
308-2	<p>a. Number of suppliers assessed for environmental impacts.</p> <p>b. Number of suppliers identified as having significant actual and potential negative environmental impacts.</p> <p>c. Significant actual and potential negative environmental impacts identified in the supply chain.</p> <p>d. Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which improvements were agreed upon as a result of assessment.</p> <p>e. Percentage of suppliers identified as having significant actual and potential negative environmental impacts with which relationships were terminated as a result of assessment, and why.</p>	As mentioned above, we have been piloting a supplier screening process. Although we did initially return a few unfavorable results in 2016, with further investigation and conversation with the suppliers in question, we determined the issue to be a problem with the way our scorecard was measuring and assessing the supplier programs, and in how the questions were communicated. In 2018, the supplier screening process became a new dialogue topic within Aptar and we look forward to reporting program improvements in future reports.

400 Social Topics

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 401 Employment

Management Approach

The reporting organization shall report its management approach for employment using GRI 103: Management Approach.

The **Table 401-1** below illustrates the total number and rate of new employee hires by age group, gender and region, and the rate of employee turnover, by age group, gender and region. The turnover rates include the number of resignations, dismissals, retirements and deaths in service. Percentages are based on the total of Full Time Equivalents (FTEs) per region. From 2017 to 2018, employee turnover stayed relatively consistent while new employee hires slightly decreased globally. This is because a worldwide benchmark of wage policy led to some adjustments in certain regions, increasing employee loyalty in some regions. We believe these figures to be accurate +/- ten percent.

- 401-1** a. Total number and rate of new employee hires during the reporting period, by age group, gender and region.
 b. Total number and rate of employee turnover during the reporting period, by age group, gender and region.

Please see **Table 401-1** below.



TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 402 Labor/Management Relations

Management Approach

The reporting organization shall report its management approach for labor/management relations using GRI 103: Management Approach.

Notice is given to employees in compliance with the local law or site-specific agreements.

- 402-1** a. Minimum number of weeks' notice typically provided to employees and their representatives prior to the implementation of significant operational changes that could substantially affect them.
 b. For organizations with collective bargaining agreements, report whether the notice period and provisions for consultation and negotiation are specified in collective agreements.

a. **Table 402-1** below illustrates the minimum number of weeks' notice typically provided to employees and their elected representatives prior to the implementation of significant operational changes that could substantially affect them. The notice period depends on the company seniority and on the level of employment. We believe this data to be accurate +/- 10 percent.
 b. Notice is given to employees in compliance with the local law, and site-specific agreements reflect these requirements.

TABLE 402-1 Notice Given For Significant Operational Changes

REGION	2018		2017	
	MINIMUM NUMBER OF WEEKS' NOTICE	NOTICE PERIOD SPECIFIED IN COLLECTIVE AGREEMENTS	MINIMUM NUMBER OF WEEKS' NOTICE	NOTICE PERIOD SPECIFIED IN COLLECTIVE AGREEMENTS
Central Europe	1 - 28 weeks	Yes, in Freyung and Dortmund/Menden	1 - 28 weeks	Yes, in Freyung and Dortmund/Menden
West Europe	4 - 12 weeks	Yes	4 - 12 weeks	Yes
South Europe	1-8 weeks	Yes	1-8 weeks	Yes
North America	0-8 weeks	Yes	0-8 weeks	Yes
China	30 days	No	30 days	No
Latin America	30 days	No	30 days	No
Southeast Asia and India	4-5 weeks	No	4-5 weeks	No

TABLE 401-1 Employee New Hire and Turnover Rates

REGION	TYPE	2018								2017							
		AGES <26YR	AGES 26-34	AGES 35-44	AGES 45-54	AGES 55+	MALE	FEMALE	TOTAL	AGES <26YR	AGES 26-34	AGES 35-44	AGES 45-54	AGES 55+	MALE	FEMALE	TOTAL
Central Europe	New Employee Hires	82 (3.11%)	92 (3.49%)	71 (2.69%)	44 (1.67%)	19 (0.72%)	178 (6.76%)	130 (4.93%)	308 (11.69%)	55 (2.16%)	102 (4.01%)	103 (4.05%)	105 (4.13%)	98 (3.85%)	272 (10.69%)	191 (7.51%)	463 (18.2%)
	Employee Turnover	29 (1.1%)	33 (1.25%)	29 (1.1%)	18 (0.68%)	9 (0.34%)	64 (2.43%)	54 (2.05%)	118 (4.48%)	28 (1.10%)	38 (1.49%)	36 (1.42%)	24 (0.94%)	46 (1.8)	80 (3.14%)	70 (2.75%)	172 (6.76%)
West Europe	New Employee Hires	188 (4.40%)	176 (4.16%)	183 (4.32%)	149 (3.52%)	46 (1.08%)	452 (10.68%)	290 (6.85%)	742 (17.54%)	108 (2.81%)	71 (1.84%)	64 (1.66%)	40 (1.04%)	6 (0.15%)	197 (5.12%)	92 (2.39%)	289 (7.51%)
	Employee Turnover	25 (0.62%)	56 (1.32%)	52 (1.3%)	44 (1.04%)	74 (1.85%)	174 (4.11%)	77 (1.92%)	253 (5.98%)	27 (0.70%)	42 (1.09%)	43 (1.12%)	38 (0.99%)	73 (1.90%)	131 (3.41%)	92 (2.40%)	223 (5.80%)
South Europe	New Employee Hires	5 (0.81%)	9 (1.45%)	4 (0.64%)	4 (0.64%)	0 (0%)	15 (2.42%)	7 (1.13%)	22 (3.54%)	2 (0.32%)	6 (0.97%)	4 (0.65%)	2 (0.32%)	0 (0%)	11 (1.78%)	3 (0.49%)	14 (2.27%)
	Employee Turnover	2 (0.32%)	7 (1.13%)	4 (0.64%)	1 (0.16%)	4 (0.64%)	14 (2.25%)	4 (0.64%)	18 (2.9%)	1 (0.16%)	4 (0.65%)	2 (0.32%)	1 (0.16%)	6 (0.97%)	10 (1.62%)	4 (0.65%)	14 (2.27%)
North America	New Employee Hires	77 (3.82%)	99 (4.92%)	75 (3.72%)	67 (3.33%)	36 (1.79%)	198 (9.83%)	156 (7.75%)	354 (17.58%)	59 (2.95%)	87 (4.36%)	60 (3.0%)	56 (2.80%)	29 (1.45%)	170 (8.51%)	121 (6.06%)	291 (14.57%)
	Employee Turnover	40 (1.99%)	94 (4.67%)	82 (4.07%)	74 (3.67%)	108 (5.36%)	244 (12.12%)	154 (7.65%)	398 (19.76%)	95 (4.76%)	46 (2.30%)	41 (2.05%)	6 (0.30%)	63 (3.15%)	156 (7.81%)	100 (5.01%)	256 (12.82%)
China	New Employee Hires	43 (4.63%)	95 (10.24%)	39 (4.20%)	8 (0.86%)	0 (0%)	109 (11.75%)	76 (8.19%)	185 (19.95%)	74 (7.86%)	132 (14.01%)	40 (4.25%)	2 (0.21%)	0 (0%)	126 (13.38%)	122 (12.95%)	248 (26.33%)
	Employee Turnover	36 (3.88%)	92 (9.92%)	37 (3.99%)	26 (2.80%)	9 (0.97%)	110 (11.86%)	90 (9.70%)	200 (21.57%)	44 (4.67%)	130 (13.80%)	42 (4.46%)	14 (1.48%)	3 (0.32%)	129 (13.69%)	104 (11.04%)	233 (24.73%)
Latin America	New Employee Hires	62 (2.07%)	89 (7.28%)	59 (4.82%)	13 (1.06%)	1 (0.08%)	137 (11.20%)	87 (7.11%)	224 (18.32%)	67 (5.68%)	66 (5.59%)	52 (4.40%)	11 (0.93%)	0 (0%)	123 (10.42%)	73 (6.18%)	196 (16.6%)
	Employee Turnover	37 (3.03%)	65 (5.07%)	50 (4.09%)	20 (1.64%)	15 (1.23%)	97 (7.93%)	88 (7.20%)	185 (15.13%)	39 (3.30%)	74 (6.27%)	56 (4.74%)	19 (1.61%)	6 (0.51%)	120 (10.16%)	74 (6.27%)	194 (16.43%)
Southeast Asia and India	New Employee Hires	20 (3.75%)	21 (3.75%)	5 (0.89%)	1 (0.18%)	0 (0%)	32 (5.71%)	15 (2.68%)	47 (8.39%)	26 (4.6%)	16 (2.83%)	9 (1.59%)	1 (0.17%)	1 (0.17%)	43 (7.62%)	10 (1.77%)	53 (9.39%)
	Employee Turnover	10 (1.79%)	50 (8.93%)	16 (2.86%)	12 (2.14%)	2 (0.36%)	55 (9.82%)	35 (6.25%)	90 (16.07%)	26 (4.6%)	48 (8.51%)	24 (4.25%)	9 (1.59%)	1 (0.17%)	69 (12.23%)	39 (6.91%)	108 (19.14%)
Aptar Total	New Employee Hires								1,882 (15.4%)								1,554 (12%)
	Employee Turnover								1,262 (10.3%)								1,200 (9%)

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 403 Occupational Health and Safety

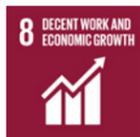
Management Approach

The reporting organization shall report its management approach for employment using GRI 103: Management Approach.

Within the Operational Excellence EHS Pillar, a network of regional leaders is established, and site-level leaders are identified into roles of safety and environmental contacts. Among other initiatives, a key focus areas for the EHS pillar was to develop a global EHS Management System (EHS MS), setting minimum standard requirements in key areas of safety and environment. Requirements were drafted and published so that any Aptar employee worldwide could comment. After incorporating the suggestions received, the Regional EHS leaders published the final Phase I (the first seventeen topics) requirements in December 2017. The process continued through 2018 with the drafting of the Phase II requirements. Also in 2018, a digital solution was introduced to help manage the various aspect of the EHS MS. An Incident Management Module was implemented in 2018. Safety performance packages are published monthly which include a global view and performance by segment, region and site. Targets are set for Total Recordable Incident Rate and Lost Time Frequency Rate. The packages are used to drive progress through various levels of the organization. A safety review call is hosted by the Segment Presidents each month during which the sites that had lost time incidents in the month speak about the incident's root cause, EHS Management System implementation progress and share best practices. Details on our 2018 Safety Accomplishments are highlighted on [page 11](#).

- 403-1**
- a. The level at which each formal joint management-worker health and safety committee typically operates within the organization.
 - b. Percentage of workers whose work, or workplace, is controlled by the organization, that are represented by formal joint management-worker health and safety committees.

- a. The health and safety committees typically consist of a combination of local management representatives, (elected) employees representatives and labor union representatives (where applicable).
- b. In 2017, site-level safety and environmental leaders were identified in all Aptar locations as part of the EHS Management system implementation. At Aptar, we also consider the Plant/Operations leaders as well as the Human Resources leaders as key stakeholders in the success of our EHS&S programs. In 2018, we worked to understand how Aptar's Global EHS Management System was deployed locally. The cooperation between site leadership and other representatives that make up the local safety committees was essential to local implementation. Various roles and responsibilities are described within the EHS Management System. During the development of the EHS Management System we hosted a comment period and allowed for feedback by any Aptar employee. When providing feedback, we encourage employees to nominate themselves to serve on the workgroups that finalize the standards. Our EHS MS workgroups have cross-functional, cross-regional representation, thus producing the best work-product for our global company. In 2018, we worked through Phase II of the EHS Management System, and this same feedback process was used for the next phase of requirements.



TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 403 Occupational Health and Safety

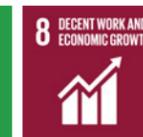
- 403-2**
- a. Types of injury, injury rate (IR), occupational disease rate (ODR), lost day rate (LDR), absentee rate (AR) and work-related fatalities, for all employees, with a breakdown by:
 - i. Region;
 - ii. Gender.
 - b. Types of injury, injury rate (IR) and work-related fatalities, for all workers (excluding employees) whose work, or workplace, is controlled by the organization, with a breakdown by:
 - i. Region;
 - ii. Gender.
 - c. The system of rules applied in recording and reporting accident statistics.

- a. See **Tables 403-2a** and **403-2b** on [page 53](#).
- b. We have provided the data by region. It is important to note that this data has not been externally verified. With the implementation of the Incident Management module in 2018, we do collect information on gender per each incident. However, we are not disclosing that information at this time.
- c. Aptar has developed its own record keeping standards and definitions based off of the U.S. Occupational Safety and Health Administration and OHSAS rules.



- 403-3**
- a. Whether there are workers whose work, or workplace, is controlled by the organization, involved in occupational activities who have a high incidence or high risk of specific diseases.

In general, employees working in our anodizing facilities in Annecy, France, Jundiai, Brazil and Watertown, CT U.S.A. are exposed to more hazards in the process as compared to our other facilities. However, we have not observed any increase in incidence or diseases as a result of this activity. We have a process to identify the global top high priority sites based on safety performance each month. These sites are required to host a safety review call with the plant managers of these sites, the Segment and Regional Business Vice/Presidents and the Vice President of Operational Excellence. This serves to promote open dialogue, best practice sharing, and holds us accountable for safety improvements.



Below are the topics which Aptar focused on for improvement within Phase I of the EHS Management System:

Critical EHS Rules	Equipment Safety
Incident Reporting	Hot Work
Regulatory Inspections	Lockout Tagout Tryout
Incident Management and Recordkeeping	Powered Industrial Vehicles
Fall Protection and Prevention	Ladders and Scaffolding
Personal Protective Equipment	Fire Protection
Confined Space	Motor Vehicle Safety
Electrical and Arc Flash Safety	Environmental Permits

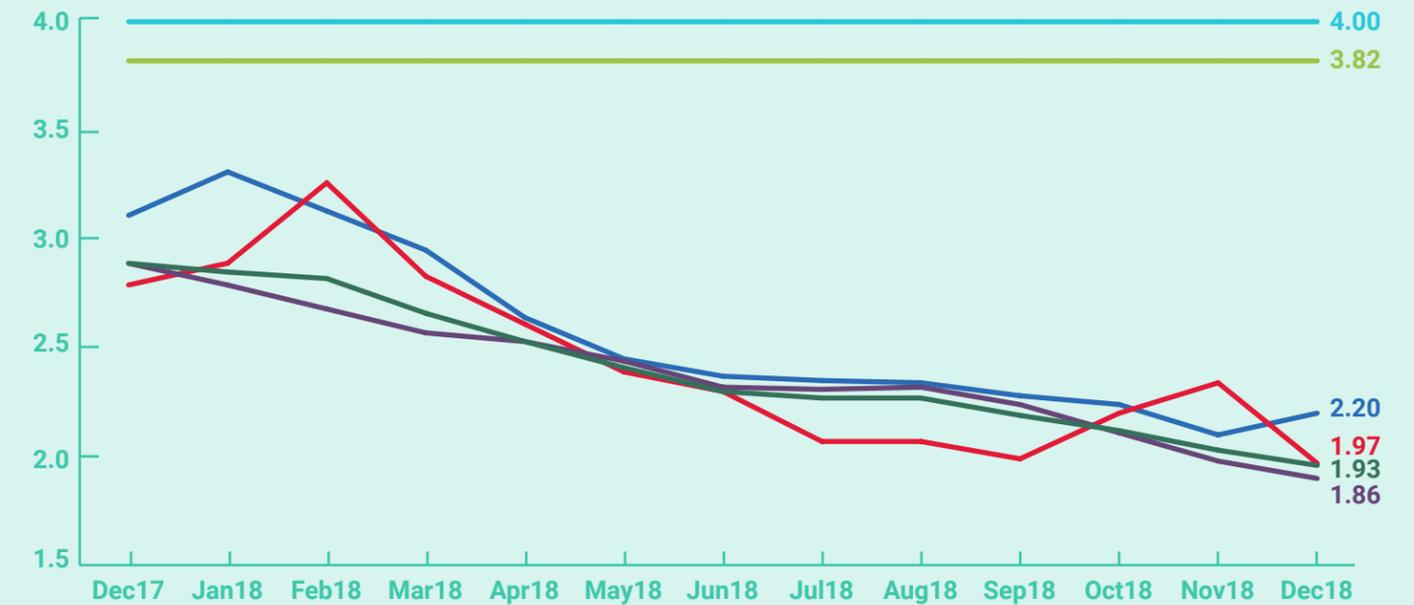
TABLE 403-2a Total Recordable Incident Rate (TRIR)

	% VARIATION 2017 TO 2018	2018	2017
Beauty + Home	-37%	1.86	2.94
EMEA	-32%	2.43	3.59
LATAM	-85%	0.61	4.01
North America	-3%	3.34	3.43
Northeast Asia	315%	0.64	0.16
Southeast Asia	-35%	0.31	0.48
Corporate and Others	Same	0.00	0.00
EMEA	Same	0.00	0.00
North America	Same	0.00	0.00
Food + Beverage	-32%	1.97	2.89
EMEA	-59%	1.25	3.06
North America	12%	5.27	4.69
Northeast Asia	Same	0.38	0.38
Pharma	-29%	2.20	3.08
EMEA	-36%	2.24	3.49
North America	295%	3.64	0.92
Northeast Asia	-44%	0.45	0.80
Southeast Asia	-100%	0.00	2.70
Aptar Total	-34%	1.93	2.93

TABLE 403-2b Lost Time Frequency Rate (LTFR)

	% VARIATION 2017 TO 2018	2018	2017	2016
Beauty + Home	-32	0.92	1.36	1.79
EMEA	-38	1.41	2.26	2.81
LATAM	-65	0.41	1.15	1.97
North America	14	1.00	0.88	1.40
Northeast Asia	Increase	0.16	0.00	0.15
Southeast Asia	43	0.41	0.29	0.00
Corporate and Others	Same	0.00	0.00	0.00
EMEA	Same	0.00	0.00	0.00
North America	Same	0.00	0.00	0.00
Food + Beverage	-48	0.73	1.41	1.45
EMEA	-48	1.00	1.91	2.00
North America	-51	0.66	1.34	1.36
Northeast Asia	Same	0.00	0.00	0.00
Pharma	-31	1.39	2.02	2.05
EMEA	-40	1.35	2.24	2.31
North America	207	2.83	0.92	1.13
Northeast Asia	Increase	0.45	0.00	0.41
Southeast Asia	Same	0.00	0.00	0.00
Aptar Total	-33	1.01	1.51	1.79

Total Recordable Incident Rate (TRIR)*
Recordable Incidents per 100 Employees (Rolling 12-month average)



Lost Time Frequency Rate (LTFR)
Lost Time Incidents per 100 Employees (Rolling 12-month average)



■ Beauty + Home ■ Food + Beverage ■ Pharma ■ 2018 Target ■ Industry Standard (U.S. BLS 2018) ■ Aptar Total

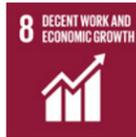
* Only North American sites reported TRIR before January 2018. TRIR target for 2018 was established based on 2017 LTFR metrics as there was no set Aptar baseline.

Safety data has not been externally verified.

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 403 Occupational Health and Safety

<p>403-4</p>	<p>a. Whether formal agreements (either local or global) with trade unions cover health and safety. b. If so, the extent, as a percentage, to which various health and safety topics are covered by these agreements.</p>	<p>a. We do not currently have mechanisms in place to be able to report the extent to which formal agreements (either local or global) with trade unions cover health and safety. However, local agreements do include health and safety topics. b. We do not currently have mechanisms in place to track and report the extent, as a percentage, to which various health and safety topics are covered by these agreements.</p>
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<p>403-5</p>	<p>a. A description of any occupational health and safety training provided to workers, including generic training as well as training on specific work-related hazards, hazardous activities or hazardous situations.</p>	<p>As a part of the implementation of the EHS Management System, training for specific topics as video modules, was provided as a supplement to the policy documents. This training was tracked at the global and site level for key management, EHS leaders and site-level HR representatives. In addition to this global training, EHS-related training is provided to employees at the site and regional level. These activities are coordinated and tracked locally.</p>
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<p>403-6</p>	<p>a. An explanation of how the organization facilitates workers' access to non-occupational medical and healthcare services, and the scope of access provided. b. A description of any voluntary health promotion services and programs offered to workers to address major non-work-related health risks, including the specific health risks addressed, and how the organization facilitates workers' access to these services and programs.</p>	<p>At the site and regional level, there are often health care services and programs offered to employees. For example in North America, employees can participate in the Vitality health program as detailed on page 9. This program offers biometric screenings, wellness incentives and access to health services. In addition, many sites around the globe offer voluntary health promotion programs and services to employees at all levels. However, we currently do not have a standard way to track this on the global level.</p>
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TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 403 Occupational Health and Safety

<p>403-7</p>	<p>a. A description of the organization's approach to preventing or mitigating significant negative occupational health and safety impacts that are directly linked to its operations, products or services by its business relationships, and the related hazards and risks.</p>	<p>Contractor safety is a part of Phase II of our EHS Management System and is currently in the draft stage. This requirement will set a global standard for the selection and management of purchased service contractors as our sites. Currently this is managed at the site or regional level and varies, as there was no global requirement in place. Once formalized, all sites must at a minimum meet the global requirement, and where local regulations are more stringent, those may supersede the global standard.</p>
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<p>403-8</p>	<p>a. If the organization has implemented an occupational health and safety management system based on legal requirements and/or recognized standards/guidelines:</p> <ul style="list-style-type: none"> i. the number and percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by such a system; ii. the number and percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by such a system that has been internally audited; iii. the number and percentage of all employees and workers who are not employees but whose work and/or workplace is controlled by the organization, who are covered by such a system that has been audited or certified by an external party. <p>b. Whether and, if so, why any workers have been excluded from this disclosure, including the types of worker excluded.</p> <p>c. Any contextual information necessary to understand how the data have been compiled, such as any standards, methodologies and assumptions used.</p>	<p>As we operate globally, these systems often vary by site and region. However, in addition to Aptar's global EHS Management System, as of year-end 2018, there were 12 (25 percent) Aptar sites certified to the OHSAS 18001 standard and two sites certified to the ISO 45001 standard, as discussed on page 11. This Occupational Health and Safety Management Certification provides the framework to identify, control and decrease risks associated with workplace health and safety. A full list of certifications can be found on Aptar.com.</p>
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TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 404 Training and Education

Management Approach

The reporting organization shall report its management approach for training and education using GRI 103: Management Approach.

Table 404-1 below illustrates the average hours of training per year per employee by region and employee category. Our definitions of these employee categories are provided in the [Appendix](#).

- 404-1** a. Average hours of training that the organization's employees have undertaken during the reporting period, by:
- Gender
 - Employee category

Table 404-1 below illustrates the average hours of training per year per employee by region and employee category. Our definitions of these employee categories are provided in the [Appendix](#).



- 404-2** a. Type and scope of programs implemented and assistance provided to upgrade employee skills.
b. Transition assistance programs provided to facilitate continued employability and the management of career endings resulting from retirement or termination of employment.

a. In previous sustainability reports we have provided articles describing the various employee training programs and modules that are offered through our award winning Aptar Corporate University. The purpose of the Corporate University, established in 2010, is to offer worldwide programs across all segments and regions to strengthen the corporate alignment in leadership, core values and business. The Corporate University trains employees to live the Aptar way, address existing gaps and gain the required skills and experience to be successful in both their current and future role. In 2018, the Corporate University hosted 48 training sessions in five languages with nearly 600 participants. In 2018, we worked to establish the framework for our new Corporate Vocational University as detailed on [page 9](#).
b. We do not currently have a transition assistance program for our retirees or terminated employees.

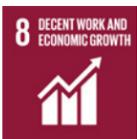


TABLE 404-1 Average Training Hours Per Employee

REGION	2018			2017			2016		
	M&P EMPLOYEES ¹	OTHER EMPLOYEES ¹	ALL EMPLOYEES	M&P EMPLOYEES ¹	OTHER EMPLOYEES ¹	ALL EMPLOYEES	M&P EMPLOYEES ¹	OTHER EMPLOYEES ¹	ALL EMPLOYEES
Central Europe	17.30	12.10		15.10	11.70		12.08	8.05	
West Europe	15.93	13.53		20.97	12.95		17.08	12.46	
South Europe	22.79	17.91		30.92	17.45		28.48	20.95	
North America	16.44	14.42		24.20	20.30		19.00	14.60	
China	13.50	22.40		26.76	28.36		24.40	21.91	
Latin America	28.76	29.87		27.15	28.60		26.87	46.72	
Southeast Asia and India	30.00	15.00		17.08	15.60		25.00	15.60	
Aptar Total			16.03			19.77			16.54

¹ See [Appendix](#) for definitions

TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 404 Training and Education

- 404-3** a. Percentage of total employees by gender and by employee category who received a regular performance and career development review during the reporting period.

We use a digital software solution for managing objectives, performance appraisals and formal succession planning. However, we do not currently report the usage statistics or demographics of system users.



GRI 405 Diversity and Equal Opportunity

Management Approach

The reporting organization shall report its management approach for diversity and equal opportunity using GRI 103: Management Approach.

Diversity and equal opportunity have become focus areas for Aptar. As detailed on [page 8](#), our President and CEO works with our Chief Human Resources Officer as Aptar's co-champions of gender equity, diversity and inclusion. At this time we are focused on the support, mentorship, an career planning for women at Aptar. In addition, we are aware that to be a strong and effective company, we must be a diverse one. We look forward to reporting our progress in future years.

- 405-1** The reporting organization shall report the following information:
- Percentage of individuals within the organization's governance bodies in each of the following diversity categories:
 - Gender;
 - Age group: under 30 years old, 30-50 years old, over 50 years old;
 - Other indicators of diversity where relevant (such as minority or vulnerable groups).
 - Percentage of employees per employee category in each of the following diversity categories:
 - Gender;
 - Age group: under 30 years old, 30-50 years old, over 50 years old;
 - Other indicators of diversity where relevant (such as minority or vulnerable groups).

a. As of year-end 2018, Aptar's Executive Committee was comprised of seven members, two of which were women (28 percent). In addition, our Board of Directors was comprised of 11 members, with three being women. In May of 2019, upon the retirement of a Board member, Aptar added an additional woman to the Board of Directors. With four women currently on the Board, we now have 40 percent of our directors as women. We are proud to be among the companies leading the way towards gender balance on corporate boards. All members of our Board of Directors are over the age of 50.
b. Employee breakdown per employee category by gender can be found in [Table 102-8](#). As it is ever-changing, the data presented in the table is a snapshot as of year-end 2018. The definitions of employee categories are provided in the [Appendix](#). In addition, [Table 401-1](#) details the total number, age range and gender of our new employee hires and the rate of employee turnover by the same categories. However, age data for our global employee workforce is not currently aggregated.



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GRI 406 Non-Discrimination

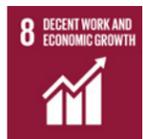
Management Approach

The reporting organization shall report its management approach for non-discrimination using GRI 103: Management Approach.

As detailed in our [Code of Business Conduct & Ethics](#), each employee, officer and director must endeavor to deal fairly and in good faith with Aptar's customers, suppliers, competitors and employees. In 2016, Aptar launched a phone- and web-based hotline which is maintained by an independent third party. The system enables us to more efficiently track, analyze and report issues to the Compliance Officer (anonymously or identified).

- 406-1**
- a. Total number of incidents of discrimination during the reporting period.
 - b. Status of the incidents and actions taken with reference to the following:
 - iv. Incident reviewed by the organization;
 - v. Remediation plans being implemented;
 - vi. Remediation plans that have been implemented, with results reviewed through routine internal management review processes;
 - vii. Incident no longer subject to action.

- a. Aptar did not receive any substantiated complaints concerning discrimination.
- b. Not applicable
 - i. Not applicable
 - ii. Not applicable
 - iii. Not applicable
 - iv. Not applicable



GRI 407 Freedom Of Association and Collective Bargaining

Management Approach

The reporting organization shall report its management approach for freedom of association and collective bargaining using GRI 103: Management Approach.

Please see [Table 102-41](#).

GRI 408 Child Labor

Management Approach

The reporting organization shall report its management approach for child labor using GRI 103: Management Approach.

Aptar prohibits the use of child labor within its own sites and by suppliers as detailed within our [Sustainable Purchasing Charter](#).

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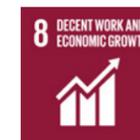
GRI 408 Child Labor

- 408-1**
- a. Operations and suppliers considered to have significant risk for incidents of:
 - i. child labor;
 - ii. young workers exposed to hazardous work.
 - b. Operations and suppliers considered to have significant risk for incidents of child labor either in terms of:
 - i. type of operation (such as manufacturing plant) and supplier;
 - ii. countries or geographic areas with operations and suppliers considered at risk.
 - c. Measures taken by the organization in the reporting period intended to contribute to the effective abolition of child labor.

Due to the nature of our business and industry, the risk of incidents of child labor are considered to be low.

Within our [Sustainable Purchasing Charter](#), it is detailed that Aptar expects our suppliers to "Not employ child labor or allow any form of exploitation of children, i.e.:

- > Abide the legal minimum age imposed in their country for employment or regarding the age for completing compulsory education;
- > Appropriately adapt tasks, hours of work and working conditions to the age and skill of the employees."



GRI 409 Forced Or Compulsory Labor

Management Approach

The reporting organization shall report its management approach for forced or compulsory labor using GRI 103: Management Approach.

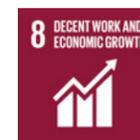
Aptar prohibits the use of forced or compulsory labor within its own sites and by suppliers as detailed within our [Sustainable Purchasing Charter](#).

- 409-1**
- a. Operations and suppliers considered to have significant risk for incidents of forced or compulsory labor either in terms of:
 - i. type of operation (such as manufacturing plant) and supplier;
 - ii. countries or geographic areas with operations and suppliers considered at risk.
 - b. Measures taken by the organization in the reporting period intended to contribute to the elimination of all forms of forced or compulsory labor.

Due to the nature of our business and industry, the risk of incidents of forced and compulsory labor are considered to be low.

Within our [Sustainable Purchasing Charter](#), it is detailed that Aptar expects our suppliers to "Disallow forced or compulsory labor by:

- > Taking all measures to check that all the employees are working voluntarily without threat of punishment or retaliation nor demand of work as a means of repayment of debt;
- > Organizing a working environment that is free from any form of human trafficking, i.e. recruitment, transfer, harboring or receipts of persons by means of the use of threat, force other forms of coercion or deception for the purpose of exploitation;
- > Ensuring the freedom of movement of employees and dependents."



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GRI 412 Human Rights Assessment

<p>Management Approach The reporting organization shall report its management approach for human rights assessment using GRI 103: Management Approach.</p>	<p>Aptar communicates its expectations that all employees respect all applicable laws, including laws regarding human rights, through its Compliance Manual. On an annual basis, the Compliance Manual is distributed to all managers and professionals and each recipient is required to sign their agreement to abide by the Compliance Manual or note where they cannot comply.</p>
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GRI 414 Supplier Social Assessment

<p>Management Approach The reporting organization shall report its management approach for supplier social assessment using GRI 103: Management Approach.</p>	<p>Aptar recognizes the social and environmental assessment of our suppliers to be a material aspect of business according to our stakeholders. As reported in 2015, we integrated supplier social and environmental screening into the supplier auditing process. In 2016, we introduced a Sustainable Purchasing Charter which is referenced in Aptar's general terms and conditions of purchase, as well as in our standard purchasing contract templates. Suppliers are asked to acknowledge and sign the agreement if they cannot provide us with a similar internal document which proves ethics and compliance standards meeting Aptar's expectations. In 2017, this charter was made available on Aptar.com in nine languages (English, French, German, Spanish, Russian, Portuguese, Italian, Chinese and Bahasa). In 2019, the Purchasing Group along with the Global Sustainability Team began investigating and benchmarking this feasibility via a proof-of-concept with EcoVadis, a third-party supplier scoring organization. In addition, Aptar uses SAP Ariba Supplier Risk to simplify risk management across the procurement process. This platform allows for end-to-end risk management by engaging suppliers, monitoring operations risks, and creating a comprehensive risk profile. Ariba monitors over 200 risk types including regulatory and legal compliance, environmental and social responsibility and financial and operational risks.</p>
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<p>414-1 New suppliers that were screened using social criteria.</p>	<p>In 2016 and 2017, we piloted our supplier sustainability screening process in North America and Europe. We selected a few strategic suppliers to receive a social and environmental screening audit and all new suppliers were screened. Other regions also screen suppliers for environmental and social impacts, but these results are currently not consolidated into a global program. In early 2018, representatives of the Operational Excellence Supply Chain, Quality and EHS & Sustainability Pillars came together to plan scaling up the process into a global program. This activity continued through 2018 and will be benchmarked as a proof-of-concept program in 2019 in Partnership with EcoVadis, a third party supplier scoring organization, in an effort to establish a screening method for future years.</p>
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TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 414 Supplier Social Assessment

<p>414-2 Negative social impacts in the supply chain and actions taken.</p>	<p>As mentioned above, we have been piloting a supplier screening process. Although we did initially return a few unfavorable results in 2016, with further investigation and conversation with the suppliers in question, we determined the issue to be a problem with the way our scorecard was measuring and assessing the supplier programs, and in how the questions were communicated. In 2018, the supplier screening process became a new dialogue topic within Aptar and we look forward to reporting program improvements in future reports.</p>
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GRI 415 Public Policy

<p>Management Approach The reporting organization shall report its management approach for public policy using GRI 103: Management Approach.</p>	<p>Aptar does not associate with any political groups, nor does the company make any political contributions, either directly or indirectly.</p>
<p>415-1 a. Total monetary value of financial and in-kind political contributions made directly and indirectly by the organization by country and recipient/beneficiary. b. If applicable, how the monetary value of in-kind contributions was estimated.</p>	<p>Not applicable</p>

GRI 416 Customer Health and Safety

<p>Management Approach The reporting organization shall report its management approach for customer health and safety using GRI 103: Management Approach.</p>	<p>Due to the highly regulated nature of our industry, Aptar products are subject to health and safety assessments from regulatory agencies like the U.S. Food and Drug Administration during all stages of the product life cycle. Aptar does not sell any products that are banned in certain markets or are the subject of stakeholder questions or public debate. Please see Table 102-11.</p>
<p>416-1 Assessment of the health and safety impacts of product and service categories.</p>	<p>100 percent of Aptar products are assessed for health and safety impacts and improvement.</p>



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GRI 416 Customer Health and Safety

416-2	Incidents of non-compliance concerning the health and safety impacts of products and services.	Aptar experienced no significant incidents of non-compliance concerning the health and safety impacts of products during the reporting year.
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GRI 417 Marketing and Labeling

Management Approach

The reporting organization shall report its management approach for marketing and labeling using GRI 103: Management Approach.	Aptar does not provide product and service information and labeling. Our customers provide labeling on their total packaging solutions.
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417-1	a. Whether each of the following types of information is required by the organization's procedures for product and service information and labeling: <ul style="list-style-type: none"> i. Content, particularly with regard to substances that might produce an environmental or social impact; ii. Safe use of the product or service; iii. Disposal of the product and environmental or social impacts; iv. Other (explain). b. Percentage of significant product or service categories covered by and assessed for compliance with such procedures.	Not applicable
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417-2	Incidents of non-compliance concerning product and service information and labeling.	Aptar experienced no significant incidents of non-compliance concerning product and service information and labeling during the reporting year.
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417-3	Incidents of non-compliance concerning marketing communications.	Aptar experienced no significant incidents of non-compliance concerning marketing communications during the reporting year.
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TOPIC	REPORTING REQUIREMENT	APTAR'S RESPONSE
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GRI 418 Customer Privacy

Management Approach

The reporting organization shall report its management approach for customer privacy using GRI 103: Management Approach.	Aptar upholds the strictest of confidence concerning data privacy. We do not disclose or use personal data from customers for any purposes that is not in accordance with the legal basis required (e.g. under article 6 of the EU General Data Protection Regulation or other international equivalents) or those agreed upon after written permission.
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418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	Aptar did not receive any substantiated complaints concerning breaches of customer privacy and losses of customer data during the reporting year.
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GRI 419 Socioeconomic Compliance

Management Approach

The reporting organization shall report its management approach for socioeconomic compliance using GRI 103: Management Approach.	Above and beyond legal requirements, employee representation is encouraged through varying location-specific initiatives.
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419-1	<ul style="list-style-type: none"> a. Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area in terms of: <ul style="list-style-type: none"> i. Total monetary value of significant fines; ii. Total number of non-monetary sanctions; iii. Cases brought through dispute resolution mechanisms. b. If the organization has not identified any non-compliance with laws and/or regulations, a brief statement of this fact is sufficient. c. The context against which significant fines and non-monetary sanctions were incurred. 	<ul style="list-style-type: none"> a. Aptar has not identified any significant fines for non-compliance with laws and/or regulations. <ul style="list-style-type: none"> i. Not applicable ii. Not applicable iii. Not applicable b. Aptar has not identified any significant fines for non-compliance with laws and/or regulations. c. Not applicable
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GRI Appendix

Employee Category Definitions

M&P = Managers & Professionals:

Executives, managers, experts, engineers & specialists who meet the following criteria:

- > Possess a bachelor's degree or above (or equivalent academic degree) which corresponds with at least three years of University level (or equivalent) education, and
- > Hold a position within the organization which requires a bachelor's degree or above in order for the position to be considered appropriately staffed.

In exceptional cases, possession of relevant skills and experience for a position may be considered as an equivalent level to a bachelor's degree.

Other employees:

Technicians, Foremen & Administrative employees (TFA): Employee who is included neither in the category of Managers and Professionals nor in the category of Operators & Workers. In some countries such employees are paid on a monthly basis (e.g. secretaries, assistants, foremen)

Operators/Workers (OW): Employee (Direct labor or indirect labor) directly involved in the industrial process (manufacturing, maintenance, etc.). In some countries they are paid on an hourly basis.

Temporary employee:

An Individual not registered as an employee paid directly by the company, but who is recruited through a temporary work agency.

