



Global Reporting Initiative (GRI) Index

2016 Corporate Sustainability Report

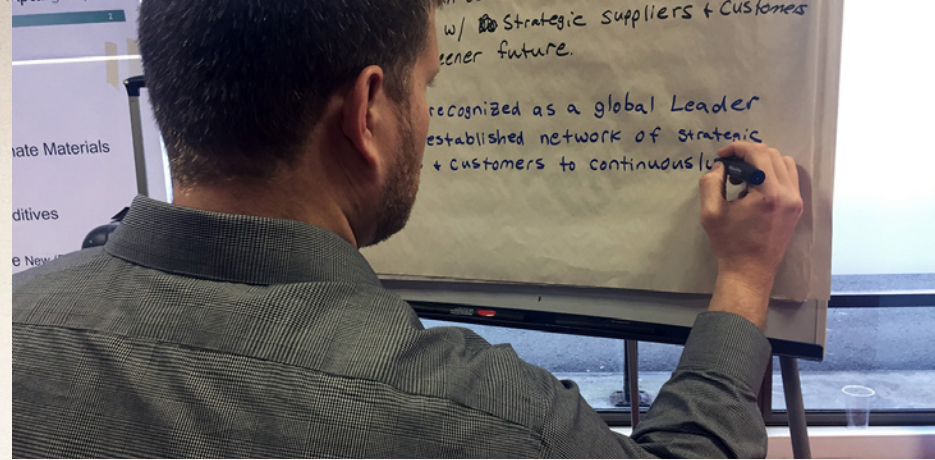
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AptarGroup’s 2016 Corporate Sustainability Report highlights activities that took place across our global portfolio from January 1 – December 31, 2016 unless otherwise noted. This report was prepared in accordance with the GRI Standards: Core options. We obtained limited external assurance from ERM Certification and Verification Services Inc. (ERM CVS) based on the International Standard on Assurance Engagement (ISAE) 3000 for the 2016 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 assurance statements are linked in the appropriate indicators within this index, and here:



[2016 Assurance Statement for Absolute Energy, Scope 1 & 2 Emissions, and Renewable Energy Purchases](#)



[2016 Assurance Statement for Scope 1 & 2 \(Location and Market Based\) CO₂ Emissions](#)

100 Universal Standard

	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 2016 Annual Report (PDF: page 9) b. AptarGroup 2016 Annual Report (PDF: pages 9-12)
102-3	a. Location of the organization's headquarters.	Crystal Lake, Illinois, USA
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 2016 Annual Report (PDF: page 19)
102-5	a. Nature of ownership and legal form.	AptarGroup 2016 Annual Report (PDF: page 7)
102-6	Markets served, including: i. Geographic locations where products and services are offered; ii. Sectors served; iii. Types of customers and beneficiaries.	AptarGroup 2016 Annual Report (PDF: page 9)
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: 12,700 ii. Total number of operations: 48 (See the table in the Appendix of this GRI index, which shows site nomenclature within our multiple data collection systems and reports.) iii. Net revenues (for public sector organizations): \$2,331 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.

GRI 102 GENERAL DISCLOSURES

102-8	a. Total number of employees by employment contract (permanent and temporary), by gender.	Please see Table 102-8 on the right, 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 .
	b. Total number of employees by employment contract (permanent and temporary), by region.	
	c. Total number of employees by employment type (full-time and part-time), by gender.	
	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.	
	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).	
	f. An explanation of how the data have been compiled, including any assumptions made.	
102-9	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.	Aptar sources components, raw materials, equipment, services, and non-production items (e.g., energy and transportation) from suppliers around the world. In 2016, these purchases totaled approximately \$1.3 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.
102-10	a. Significant changes to the organization's size, structure, ownership, or supply chain, including:	We acquired a company, Mega Airless, in 2016 that had revenues of \$70 million USD. Also we completed an expansion of our elastomer component production facility in France in 2016. Otherwise, we have not had any significant changes in size, structure, ownership or supply chain. Though not significant, changes such as movement of product lines and external weather factors may have some affect on variation within our sustainability metrics.
	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.	
102-11	a. Whether and how the organization applies the Precautionary Principle or approach.	Every product manufactured by Aptar must comply with applicable regulations in the regions where it is distributed. To ensure compliance and better protect consumers and the environment, Aptar has set up dedicated regulatory and quality control departments tasked with: <ul style="list-style-type: none">• Carrying out continuous regulatory monitoring• 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 To achieve these aims, Aptar establishes strong relationships with supply chain partners, defines specific regulatory specifications for each type of material and collects and analyzes supplier declarations.

TABLE 102-8 TOTAL NUMBER OF EMPLOYEES

Region	Employee Category	2016					2015				
		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	1507	744	273	1978	2251	1480	741	260	1961	2221
	Temporary	65	48	0	113	113	53	62	0	115	115
West Europe	Fixed + Unlimited Term Contract	2459	1396	838	3017	3855	2419	1411	810	3020	3830
	Temporary	516	428	14	930	944	464	419	10	873	883
South Europe	Fixed + Unlimited Term Contract	525	92	127	490	617	513	86	119	480	599
	Temporary	101	46	0	147	147	98	59	0	157	157
North America	Fixed + Unlimited Term Contract	1207	768	604	1371	1975	1181	774	559	1396	1955
	Temporary	43	23	0	66	66	47	25	0	72	72
China	Fixed + Unlimited Term Contract	509	419	92	836	928	550	461	96	915	1011
	Temporary	6	5	0	11	11	5	15	0	20	20
Latin America	Fixed + Unlimited Term Contract	738	439	254	923	1177	714	432	238	905	1146
	Temporary	7	26	0	33	33	18	16	5	29	34
Southeast Asia and India	Fixed + Unlimited Term Contract	403	235	92	542	634	533	233	90	676	766
	Temporary	132	80	0	212	212	93	69	0	162	162
Aptar Total	Fixed + Unlimited Term Contract	7348	4093	2280	9157	11437	7460	4214	2193	9481	11528
	Temporary	870	656	14	1512	1526	778	665	15	1428	1443

¹ See [Appendix](#) for definitions

	REPORTING REQUIREMENT	APTAR'S RESPONSE
GRI 102 GENERAL DISCLOSURES		
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.	Not applicable
102-13	a. A list of the main memberships of industry or other associations, and national or international advocacy organizations.	Not applicable
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>
102-17	a. A description of internal and external mechanisms for: i. Seeking advice about ethical and lawful behavior, and organizational integrity; ii. Reporting concerns about unethical or unlawful behavior, and organizational integrity.	<p>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.</p> <p>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.</p>


	REPORTING REQUIREMENT	APTAR'S RESPONSE
GRI 102 GENERAL DISCLOSURES		
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: audit, compensation, governance and executive</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
102-40	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 below). 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 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 2016 report.
102-41	a. Percentage of total employees covered by collective bargaining agreements.	<p>Please see Table 102-41 below. We believe this information to be accurate +/-10%.</p> 

TABLE 102-41 COLLECTIVE BARGAINING

Region	2016	2015
	Percentage	Percentage
Central Europe	12.50	12.50
West Europe	94.52	94.52
South Europe	99.00	99.00
North America	7.84	8.23
China	100.00	100.00
Southeast Asia and India	0.00	0.00
Latin America	85.70	85.70
Aptar Total	57.08	57.64

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
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
102-44 a. Key topics and concerns that have been raised through stakeholder engagement, including: 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 been working diligently to understand the needs of our customers as they relate to sustainable materials and, especially throughout 2016, have received several requests for trials of Post-Consumer Recycled (PCR) resin as reported page 6 and page 23 .
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 2016 Annual Report (PDF: pages 35-67) See the table in the Appendix of this GRI index, 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.	About This Report In preparation for our 2015 Corporate Sustainability Report, Aptar conducted a materiality assessment to define report content and aspect boundaries. Elements of the assessment included: <ul style="list-style-type: none">• Peer Analysis: Aptar conducted a landscape assessment to better understand the current level of sustainability reporting in the industry• Aptar Voice of the Customer Survey: Aptar surveyed approximately 90 customers to learn more about their sustainability priorities and expectations• Materiality Survey: Aptar surveyed internal and external stakeholders and asked them to rank sustainability issues according to their economic, environmental and social impacts on the business. Respondents included:<ul style="list-style-type: none">– Community and thought leaders– Aptar employees in eight countries representing all three segments of the business, as well as corporate, and a variety of functional roles– Seniority ranged from the intern level to the Executive Board• Interviews: Aptar conducted one-on-one interviews with senior executives to better understand their vision for sustainability at Aptar• Investor Communication In conjunction with the 2015 Corporate Sustainability Report, we published a subsequent online materiality assessment survey to allow feedback on the 2015 report content. We then used the results of that online survey to verify our approach and establish the content of this 2016 Corporate Sustainability Report. We will use a similar survey process to collect feedback on this 2016 report.

REPORTING REQUIREMENT	APTAR'S RESPONSE
GRI 102 GENERAL DISCLOSURES	
102-47 a. A list of the material topics identified in the process for defining report content.	Our 2015 Corporate Sustainability Report focused on the following material topics: <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 The materiality assessment conducted throughout 2016 returned similar suggestions, with a request to report more specifically on these three key issues, which are explained in more details on pages 6 and 7 : <ol style="list-style-type: none">1. That Aptar manufactures products made from sustainable materials;2. That Aptar remains conscience of energy consumption within our operations;3. That we provide innovative solutions that are able to be recycled upon end of use.
102-48 a. The effect of any restatements of information given in previous reports, and the reasons for such restatements.	We are providing our sustainability metrics reporting system users the ability to report fuel consumption in more specific category designations. Due to this heightened awareness on fuel consumption reporting, as we tested the system throughout 2016, our users gained better understanding of our metrics definitions and the fuels to include therein. We also added the Mega Airless sites to our reporting processes. Given the addition of the three Mega Airless facilities to our portfolio, for comparison purposes we needed to re-establish our 2014 baseline values to account for the additional consumption. However, we do not have access to 2014 consumption totals from these sites. We therefore assumed similar values as reported by the sites for 2015, and added the 2015 electricity, natural gas and fuel consumption totals for these sites into our 2014 base line totals. The variation was not significant.
102-49 a. Significant changes from previous reporting periods in the list of material topics and topic Boundaries.	There are no significant changes from the previous reporting periods in the list of material topics and topic Boundaries. We are using the GRI Standards, published in October of 2016, to report our disclosures. With this we have included additional details on our Occupational Health and Safety Programs (GRI-403) and management of Non-Discrimination (GRI-406).
102-50 a. Reporting period for the information provided.	This report covers activities from January 1, 2016 to December 31, 2016 unless otherwise noted.
102-51 a. If applicable, the date of the most recent previous report.	13-May-16

REPORTING REQUIREMENT		APTAR'S RESPONSE
GRI 102 GENERAL DISCLOSURES		
102-52	a. Reporting cycle.	Annual
102-53	a. The contact point for questions regarding the report or its contents.	Beth Holland Director, Environment, Health and Safety & Sustainability Beth.Holland@aptar.com
102-54	a. The claim made by the organization, if it has prepared a report in accordance with the GRI Standards, either: 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 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: 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: 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.	About This Report In addition to the energy and emissions data that was externally verified, all report information was reviewed by our Sustainability Report Steering Committee, Aptar's Vice President of Investor Relations, and functional leaders throughout the organization. Assurance statements from ERM CVS can be found here: • 2016 Assurance Statement for Absolute Energy, Scope 1 & 2 Emissions, and Renewable Energy Purchases • 2016 Assurance Statement for Scope 1 & 2 (Location and Market Based) CO₂ Emissions We completed a self-audit of our 2015 and 2016 Lost Time incident data (reviewed number of lost time incidents, number of lost time days and number of hours worked), auditing site-level reports of monthly data as provided to Human Resources and comparing that against the metrics as reporting into our SAP Business Intelligence Safety Module. This activity was performed by our Director, Environment, Health and Safety & Sustainability along with two members of our Global Manufacturing Excellence team.

200 Economic Disclosures

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	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: 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'. b. Where significant, report EVG&D separately at country, regional, or market levels, and the criteria used for defining significance.	a. AptarGroup Form 10-K (PDF: page 33), filed February 27, 2017 AptarGroup Form 10-K (PDF: page 33), filed February 27, 2017 i. AptarGroup Form 10-K (PDF: page 33, 37), filed February 27, 2017 ii. AptarGroup Form 10-K , (PDF: page 38), filed February 27, 2017 b. We collect and evaluate this information, but we do not publicly disclose.
201-2	a. Risks and opportunities posed by climate change that have the potential to generate substantive changes in operations, revenue, or expenditure, including: 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.	Aptar responds to the CDP Climate Change questionnaire on an annual basis. Information about our risks and opportunities posed by climate change are included within our response.

GRI 201 ECONOMIC DISCLOSURES

- 201-3

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.

b. If a separate fund exists to pay the plan's pension liabilities:

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.

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.

d. Percentage of salary contributed by employee or employer.

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.
- a. [AptarGroup Form 10-K](#) (PDF: page 49), filed February 27, 2017

b. [AptarGroup Form 10-K](#) (PDF: page 49), filed February 27, 2017

i. [AptarGroup Form 10-K](#) (PDF: page 49), filed February 27, 2017

ii. [AptarGroup Form 10-K](#) (PDF: page 51), filed February 27, 2017

iii. As of December 31, 2016.

c. We maintain our funding within the legal threshold.

d. Our form 11-K is an annual report of employee stock purchase, savings and similar plans. The 11-K for reporting year 2015 was filed on June 17, 2016. The 11-K for reporting year 2016 is scheduled to be filed near the end of Q2 2017.

e. We do not currently have mechanisms in place to be able to report the level of participation in retirement plans.

201-4

a. Total monetary value of financial assistance received by the organization from any government during the reporting period, including:

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.

b. The information in 201-4-a by country.

c. Whether, and the extent to which, any government is present in the shareholding structure.

a-i. Tax credits estimated to be received for 2016 from various states (listed in b below) = \$427,000

ii. Not applicable

iii. Investment and other incentive grants estimated to be received for 2016 = \$895,000

iv. Not applicable

v. Not applicable

vi. Not applicable

vii. Not applicable

viii. Not applicable

b. U.S., specifically the states of CT, IL, NC, NY, WI. Please see **Table 201-4** to the right.

c. Not applicable

TABLE 201-4 SUMMARY OF STATE TAX CREDITS AND INCENTIVES

Type	Amount by State					Total
	CT	IL	NC	NY	WI	
Human Capital Investment Credit	1,000					1,000
Electronic Data Processing	8,250					8,250
Fixed Capital Investment Credit	45,461	22,686		21,892		90,039
Research & Development Tax Credit	36,000	4,824	29,305		100,000	170,129
Manufacturing Sales Tax Credit					37,744	37,744
Manufacturing Production Tax Credit					120,000	120,000
Total Tax Credits	90,711	27,510	29,305	21,892	257,744	427,162
Incentive Tax Credits		450,000			445,000	895,000
Grand Totals	90,711	477,510	29,305	21,892	702,744	1,322,162

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. Resin purchases make up approximately 18% of our total 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).

GRI 204 PROCUREMENT PRACTICES

- 204-1

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).

b. The organization's geographical definition of 'local'.

c. The definition used for 'significant locations of operation'.

a. Please see **Table 204-1** to the right.

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.

c. We consider all of our manufacturing facilities significant locations of operation.

TABLE 204-1 RESIN PROCUREMENT PRACTICES

Region	Country	Aptar Facility	2016			2015		
			Facility's overall spend as a percentage of Aptar's total procurement spend	Percentage of total resin purchases by volume	Percentage of facility's resin purchases which is spent locally	Facility's overall spend as a percentage of Aptar's total procurement spend	Percentage of total resin purchases by volume	Percentage of facility's resin purchases which is spent locally
Asia	China	Suzhou	6.51	7.25	95	4.62	0.5	95 ⁴
Europe	Germany	Freyung	9.62	10.52	100	4.71	13.7	100
Europe	France	Poincy	6.01	6.66	100	1.97	7.3	100
Europe	Italy	Pescara Chieti	5.52	5.73	100	7.69 (Chieti 4.28; Pescara 3.41)	6.1	100
Europe	Germany	Dortmund (including Menden)	3.30	4.74	100	5.39	3.9	100
Europe	Czech Republic	Ckyne	3.33	3.73	100	0.99	3.6	100
Europe	Germany	Radolfzell	2.67	2.32	100	4.99 (includes Eigeltingen)	3.2	100
Europe	Russia	Vladimir	1.98	2.33	100	0.83	3.2	100 ³
Europe	United Kingdom	Leeds	2.12	2.59	100	1.16	3	100
Europe	France	Le Neubourg	1.78	1.76	100	5.60	2.7	100
Europe	Spain	Torello	1.31	1.38	100	0.50	1.8	100
Europe	France	Le Vaudreuil	6.73	3.12	100	7.44 (Vaudreuil 6.57; Val de Reuil 0.44)	1.7	100
Europe	France	Oyonnax	4.46	2.20	100	4.93	0.8	100
Europe	France	Charleval	Included in Le Neubourg	Included in Le Neubourg		Included in Verneuil	0.6	100
Europe	Switzerland	Mezzovico	0.98	0.88	100	1.89	0.3	100
Europe	France	Verneuil	Included in Le Neubourg	Included in Le Neubourg		3.32 (includes Charleval)	0.2	100
Latin America	Mexico	Queretaro	5.72	5.12	96	2.37	4.6	100 ²
North America	U.S.A.	Mukwonago	20.26	19.59	100	6.95	26.8	100
North America	U.S.A.	Lincolnton	6.53	6.49	100	2.35	7.4	100
North America	U.S.A.	Libertyville	3.87	3.77	100	1.37	5.1	100
North America	U.S.A.	Cary ¹	2.86	4.11	100	5.42	2.3	100
North America	U.S.A.	McHenry ¹	1.50	1.48	100	0.54	2.2	100
North America	U.S.A.	Stratford	1.95	2.80	100	2.48	1.8	100
All other Aptar facilities			0.99	1.43	100	22.49	0.4	

¹ Within our SAP Business Intelligence platform for reporting environmental sustainability (energy, waste, water) metrics, Cary and McHenry are combined into a roll-up location referred to as "Cary Campus".
² Includes 90% from N. American suppliers and 10% from Brazilian suppliers.
³ Includes 0% from Russian suppliers and 100% from European suppliers.
⁴ Includes 95% from Thailand and 5% from N. American suppliers.

REPORTING REQUIREMENT	APTAR'S RESPONSE
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. Finally, employees can report allegations of corruption through their managers or through their local human resources department.	
205-1	<div><div>a. Total number and percentage of operations assessed for risks related to corruption.</div><div>b. Significant risks related to corruption identified through the risk assessment.</div></div> <div><div>a. All of our operations are assessed for risks related to corruption. See Appendix for a list of operations.</div><div>b. As of the date the system launched, Aptar does not have any corruption risks identified through the risk assessment.</div></div>

REPORTING REQUIREMENT	APTAR'S RESPONSE
GRI 205 ANTI-CORRUPTION	
205-2	<div><div><div>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.</div><div>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.</div><div>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.</div><div>d. Total number and percentage of governance body members that have received training on anti-corruption, broken down by region.</div><div>e. Total number and percentage of employees that have received training on anti-corruption, broken down by employee category and region.</div></div><div><div>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. In 2016, we initiated worldwide training on the Aptar Compliance Manual. This training is ongoing, but as of December 31, 2016, we had achieved the following completion events: Asia 212, Europe+USA 309, Latin America 186, Russia 26 (a total of 737 employees).</div><div>Due to limitations with our reporting systems, and the multiple methods by which they are communicated, we are not currently able to provide data on the overall number of employees who have received communications and training regarding the anti-corruption policies and procedures, beyond that of our identified target audiences.</div><div>Please see Table 205-2 below.</div></div></div>

TABLE 205-2 ANTI-CORRUPTION TRAINING

	2016									2015								
		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	
Metric	Source	Total #	%	Total #	%	Total #	%	Total #	%	Source	Total #	%	Total #	%	Total #	%	Total #	%
Governance body members that anti-corruption policies and procedures have been communicated to	Communication occurred in 2015	2	100.00	8	100.00	2	100.00	12	100.00	Compliance List Consolidated Aptar Management System (AMS)	2	100	8	100.0	2	100	12	100
Governance body members that have received training on anti-corruption	Training occurred in 2015	2	100.00	7	87.00	1	50.00	9	75.00	Aptar Anti-Bribery Agenda Training 2014 (Aptar ECM website)	2	100	7	87.0	1	50	9	75
Employees that Aptar's anti-corruption policies and procedures have been communicated to	eLearning participants in 2015	263	100.00	1351	100.00	280	100.00	502	100.00	Compliance List Consolidated Aptar Management System (AMS)	256	100	1117	100.0	293	100	392	100
Employees that have received training on anti-corruption	eLearning participants in 2015	261	99.62	1323	97.93	260	92.86	489	97.41	Aptar Anti-Bribery Agenda Training 2014 (Aptar ECM website)	131	51	198	17.7	144	49	89	23

REPORTING REQUIREMENT		APTAR'S RESPONSE	
GRI 205 ANTI-CORRUPTION			
205-3	a. Total number and nature of confirmed incidents of corruption.	a. As of the date the system launched, Aptar does not have any confirmed incidents of corruption.	
	b. Total number of confirmed incidents in which employees were dismissed or disciplined for corruption.	b. As of the date the system launched, Aptar does not have any confirmed incidents in which employees were dismissed or disciplined for corruption.	
	c. Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption.	c. As of the date the system launched, Aptar does not have any confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption.	
	d. Public legal cases regarding corruption brought against the organization or its employees during the reporting period and the outcomes of such cases.	d. As of the date the system launched, Aptar does not have any public legal cases regarding corruption brought against the organization or its employees during the reporting period.	
GRI 206 ANTI-COMPETITIVE BEHAVIOR			
Management Approach			
The reporting organization shall report its management approach for anti-competitive behavior using GRI 103: Management Approach.		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. Finally, employees can report allegations of anti-competitive behavior through their managers or through their local human resources department.	
206-1	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.	a. As of the date the system launched, Aptar does not have any legal actions pending or completed regarding anti-competitive behavior or violations of anti-trust and monopoly legislation.	
	b. Main outcomes of completed legal actions, including any decisions or judgments.	b. Not applicable	

300 Environmental Topics

REPORTING REQUIREMENT		APTAR'S RESPONSE
GRI 301 MATERIALS		
Management Approach		Our sustainable materials investigations play an increasingly important role in researching and developing new resins for packaging. In 2015, Aptar began trials of certain bioresins and Post-Consumer Recycled (PCR) resin at research facilities in Europe and the U.S. We began several trial programs using bioresins, and also are finding customers interested in the environmental benefits of their use. In 2015 we conducted trials of Post-Consumer Recycled (PCR) resin at varying percentages. This work continued in 2016, and in early Q2 of 2017 we brought a 50/50 closure to market. Please see pages 22 and 23 for more information on this PCR work and our responsible products. We do not currently have mechanisms in place to enable aggregated reporting of materials used.
The reporting organization shall report its management approach for materials using GRI 103: Management Approach.		

REPORTING REQUIREMENT	APTAR'S RESPONSE
GRI 302 ENERGY	
Management Approach	
The reporting organization shall report its management approach for energy using GRI 103: Management Approach.	<p>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 in order to score energy performance according to the global sustainability scorecard, and with the baseline year being 2014. Energy targets are incorporated into performance plans at several levels of the business, including those of our Segment Presidents.</p> <p>Aptar tracks environmental metrics for all manufacturing facilities, warehouses and joint ventures in which Aptar holds 51% or greater ownership. We do not currently require our office locations in Crystal Lake, IL U.S.A or Louveciennes, France to report environmental metrics through the SAP BI system. Further, we do not require our research and development lab in Next Breath Maryland U.S.A. to report because that lab is a small room in a larger building. Next Breath consumption values are very minimal compared to Aptar globally, and we cannot currently isolate their metrics because of the building structure.</p> <p>Although we are able to capture their metrics within the SAP BI system, representatives within our newly acquired Mega Airless facilities in Germany and New Jersey, U.S.A. have not been officially trained on data entry into this system. Instead, we collected their sustainability data offline and loaded it in a batch. This was done because we will launch the system enhancements very soon and determined it would be a better use of time to train these individuals within the new system only. Given the addition of the three Mega Airless facilities to our portfolio, for comparison purposes we needed to re-establish our 2014 baseline values to account for the additional consumption. However, we do not have access to 2014 consumption totals from these sites. We therefore assumed similar values as reported by the sites for 2015, and added the 2015 electricity, natural gas and fuel consumption totals for these sites into our 2014 base line totals.</p>


REPORTING REQUIREMENT	APTAR'S RESPONSE
GRI 302 ENERGY	
302-1	<div><div><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><div><p>i. Electricity consumption</p><p>ii. Heating consumption</p><p>iii. Cooling consumption</p><p>iv. Steam consumption</p></div><p>d. In joules, watt-hours or multiples, the total:</p><div><p>i. Electricity sold</p><p>ii. Heating sold</p><p>iii. Cooling sold</p><p>iv. Steam sold</p></div><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></div><div><p>While the new SAP BI system is able to accept fuel oil values broken into more sub-categories than ever before, and therefore conversion factors can be accurately assigned to each in the future, in 2014, 2015 and 2016 we have assumed the worst case conversion factor by applying that of diesel fuel oil.</p><p>Most of the conversion factors used are prepopulated standards within the SAP system. Energy specific factors were used according to the Greenhouse Gas Protocol, and were reviewed as part of the data verification activities.</p><p>A chart showing our renewable energy sources is given on page 19.</p><p>Please see Table 302-1 below.</p></div></div>
302-2	<div><div><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></div><div><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></div></div>


TABLE 302-1 ABSOLUTE ENERGY CONSUMPTION (KWH)

	% Variation 2016 versus 2015	% Variation 2016 versus base 2014	2016	2015	2014
Electricity (renewable)	8	1695	152,276,737	140,734,026	8,481,700
Electricity (non-renewable)	-4	-27	348,608,693	361,887,494	477,903,092
Total electricity	0	3	500,885,430	502,621,520	486,384,792
Natural gas	-8	-8	73,764,903	80,566,774	80,489,023
Fuels	21	-1	6,907,351	5,693,354	6,997,258
Total energy consumption (absolute)	-1	1	581,557,683	588,881,648	573,871,073

REPORTING REQUIREMENT

APTAR'S RESPONSE

GRI 302 ENERGY

302-3	a. Energy intensity ratio for the organization.		a. Please see Table 302-3 below.
	b. Organization-specific metric (the denominator) chosen to calculate the ratio.		b. All sustainability metrics are currently normalized to quantities of parts invoiced. However, as part of the metrics reporting system enhancements that were piloted in 2016, sites will be able to normalize by weight of units produced as well as by revenue.
	c. Types of energy included in the intensity ratio; whether fuel, electricity, heating, cooling, steam, or all.		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%. Invoiced Quantities for Aptar Brecey and Granville are added to totals by submitting a request for service ticket to the Information Systems Helpdesk.
	d. Whether the ratio uses energy consumption within the organization, outside of it, or both.		c. Aptar considers total energy consumption to be electricity + fuel oil + natural gas.
			d. For the purpose of our total energy consumption calculations and reporting through our sustainability scorecard, we consider energy consumption within the organization.

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. 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. Readers are invited to learn more about our water programs within our Annual CDP responses.

GRI 305 EMISSIONS	
Management Approach The reporting organization shall report its management approach for emissions using GRI 103: Management Approach.	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 2016 emissions, we have applied emissions factors from the eGRID2014 standards, published in 2017, 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 from 2015. 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 4th Assessment Report of the Greenhouse Gas Protocol.


TABLE 302-3 INTENSITY ENERGY CONSUMPTION (KWH/IQ(TH))

	% Variation 2016 versus 2015	% Variation 2016 versus base 2014	2016	2015	2014
Electricity (renewable) intensity	9	1741	1.855	1.702	0.101
Electricity (non-renewable) intensity	-3	-25	4.246	4.378	5.676
Total electricity intensity	0	6	6.101	6.080	5.777
Natural gas intensity	-8	-6	0.898	0.975	0.956
Fuels intensity	22	1	0.084	0.069	0.083
Total energy consumption (intensity)	-1	4	7.083	7.123	6.816

REPORTING REQUIREMENT

APTAR'S RESPONSE

GRI 305 EMISSIONS

305-1	a. Gross direct (Scope 1) GHG emissions in metric tons of CO ₂ equivalent.		a. Please see Table 305-1&2 below.
	b. Gases included in the calculation; whether CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , or all.		b. CO ₂
	c. Biogenic CO ₂ emissions in metric tons of CO ₂ equivalent.		c. Not applicable
	d. Base year for the calculation, if applicable, including: 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.		d. Unless noted otherwise, we consider 2014 our base year for sustainability metrics as this is the year we first began working on our GRI-based sustainability scorecard. More information about this decision, and the introduction of the scorecard in general, was reported within our 2015 Corporate Sustainability Report.
	e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.		e. Scope 1 emissions were calculated using the IEA energy databases.


305-2	a. Gross direct (Scope 2) GHG emissions in metric tons of CO ₂ equivalent.		a. Please see Table 305-1&2 below.
	b. Gases included in the calculation; whether CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , or all.		b. CO ₂
	c. Biogenic CO ₂ emissions in metric tons of CO ₂ equivalent.		c. Not applicable
	d. Base year for the calculation, if applicable, including: 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.		d. Unless noted otherwise, we consider 2014 our base year for sustainability metrics as this is the year we first began working on our GRI-based sustainability scorecard. More information about this decision, and the introduction of the scorecard in general, was reported within our 2015 Corporate Sustainability Report.
	e. Source of the emission factors and the global warming potential (GWP) rates used, or a reference to the GWP source.		e. We calculate greenhouse gas emissions according to the accounting standards within the Greenhouse Gas Protocol. For the reporting year 2016 emissions, we have applied emissions factors from the eGRID2014 standards, published in 2017, 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 from 2015. The Global Warming Potential applied to refrigerants is from the 4th Assessment Report.

TABLE 305-1&2 ABSOLUTE CARBON EMISSIONS (TONNES CO₂e)

	% Variation of emissions 2016 versus 2015	% Variation 2016 versus base 2014	2016	2015	2014
Scope 1, natural gas + fuels	-19	-13	15,271	18,828	17,476
Scope 1, estimated refrigerants			780		
Scope 1, natural gas + fuels + estimated refrigerants			16,051		
Scope 2 location-based	-2	4	181,737	184,992	174,306
Scope 2 market-based	-6		163,942	174,690	
Scope 2 total, including renewable energy credits	-7		155,134	166,665	
Aptar Scope 1 + 2 total	-8	-11	171,185	185,493	191,782

	REPORTING REQUIREMENT	APTAR'S RESPONSE
GRI 305 EMISSIONS		
305-3	a. Gross direct (Scope 3) GHG emissions in metric tons of CO ₂ equivalent.	Aptar responds to the CDP Climate Change questionnaire on an annual basis. Information about our Scope 3 emissions are included within our response.
305-4	a. GHG emissions intensity ratio for the organization. b. Organization-specific metric (the denominator) chosen to calculate the ratio. c. Types of GHG emissions included in the intensity ratio; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3). d. Gases included in the calculation; whether CO ₂ , CH ₄ , N ₂ O, HFCs, PFCs, SF ₆ , NF ₃ , or all.	<div><div></div><div>a. See Table 305-4 below b. All sustainability metrics are currently normalized to quantities of parts invoiced. However, as part of the metrics reporting system enhancements that were piloted in 2016, sites will be able to normalize by weight of units produced as well as by revenue. 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%. Invoiced Quantities for Aptar Brecey and Granville are added to totals by submitting a request for service ticket to the Information Systems Helpdesk. c. Scope 1 + Scope 2 d. CO₂</div></div>
305-5	a. GHG emissions reduced as a direct result of reduction initiatives, in metric tons of CO ₂ equivalent.	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.

TABLE 305-4 INTENSITY CARBON EMISSIONS (TONNES CO₂e/ IQ(TH))

	% Variation of emissions 2016 versus 2015	% Variation 2016 versus base 2014	2016	2015	2014
Scope 1, natural gas + fuels	-18	-10	0.0002	0.0002	0.0002
Scope 1, estimated refrigerants			0.0000		
Scope 1, natural gas + fuels + estimated refrigerants			0.0002		
Scope 2 location-based	-1	7	0.0022	0.0022	0.0021
Scope 2 market-based	-6		0.0020	0.0021	
Scope 2 total, including renewable energy credits	-6		0.0019	0.0020	
Aptar Scope 1 + 2 total	-7	-8	0.0021	0.0022	0.0023

	REPORTING REQUIREMENT	APTAR'S RESPONSE
GRI 306 EFFLUENTS AND WASTE		
	Management Approach The reporting organization shall report its management approach for effluents and waste using GRI 103: Management Approach.	<p>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. Because water is not identified as a material indicator, water consumption is not integrated into the sustainability scorecard.</p> <p>Aptar tracks environmental metrics for all manufacturing facilities and joint ventures in which Aptar holds 51% or greater ownership. We do not currently require our office locations in Crystal Lake, IL U.S.A or Louveciennes, France to report metrics through the SAP BI system. Further, we do not require our research and development lab in Next Breath Maryland U.S.A. to report because that lab is a small room in a larger building. Next Breath consumption values are very minimal compared to Aptar globally, and we cannot currently isolate their metrics because of the building structure.</p> <p>Although we are able to capture their metrics within the SAP BI system, representatives within our newly acquired Mega Airless facilities in Germany and New Jersey, U.S.A. have not been officially trained on data entry into this system. Instead, we collected their sustainability data offline and loaded it in a batch. This was done because we will launch the system enhancements very soon and determined it would be a better use of time to train these individuals within the new system only.</p>
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.

GRI 306 EFFLUENTS AND WASTE

306-2	a. Total weight of hazardous waste, with a breakdown by the following disposal methods where applicable: i. Reuse ii. Recycling iii. Composting iv. Recovery, including energy recovery v. Incineration (mass burn) vi. Deep well injection vii. Landfill viii. On-site storage ix. Other (to be specified by the organization)	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 in the Aptar Production System's 20 Keys Program, which is explained on page 17 . Within Key 16- Sustainability, sites are required to perform calculations toward landfill free in level 3.4, and must achieve Landfill Free certification on level 4.1.
	b. Total weight of non-hazardous waste, with a breakdown by the following disposal methods where applicable: i. Reuse ii. Recycling iii. Composting iv. Recovery, including energy recovery v. Incineration (mass burn) vi. Deep well injection vii. Landfill viii. On-site storage ix. Other (to be specified by the organization)	As of year-end 2016, twenty Aptar locations had achieved landfill free certification, with even more certifications added by the time this report was assembled in Q1 2017 (Sites certified in 2017 are not included in the table below). These sites have proven, by third-party verification audit, at least 90% 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% of a facility's total waste.
	c. How the waste disposal method has been determined: i. Disposed of directly by the organization, or otherwise directly confirmed ii. Information provided by the waste disposal contractor iii. Organizational defaults of the waste disposal contractor	The enhancements made to the SAP Business Intelligence system, which were piloted in 2016, included 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. However, we are currently able to provide detailed disposal method information only at landfill free certified sites, where the data has been verified by a third-party. 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. Please see Tables 306-2a and b on the right.
306-3	a. Total number and total volume of recorded significant spills.	Aptar experienced no significant spills during the reporting year.
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 tracked at the site level.
306-5	a. Water bodies and related habitats that are significantly affected by water discharges and/or runoff.	Not applicable

TABLE 306-2a LANDFILL FREE RATIOS

Aptar Site	Country	Sustainability Region	Certification Year	2014 Total Landfill Free %	2015 Total Landfill Free %	2016 Total Landfill Free %
Cajamar	Brazil	Latin America	2016		100.0	100.0
Maringa	Brazil	Latin America	2016		99.5	100.0
Cary Campus	U.S.A., IL	North America	2016		93.5	93.2
Libertyville	U.S.A., IL	North America	2016		92.5	95.0
Lincolnton	U.S.A., NC	North America	2016		94.5	96.0
Ckyne	Czech Republic	Europe - F+B	2015		91.3	93.6
Le Neubourg	France	Europe - B+H	2015		95.6	94.0
Le Vaudreuil	France	Europe - Pharma	2015		95.5	96.0
Mezzovico	Switzerland	Europe - Pharma	2015		92.5	94.2
Queretaro	Mexico	Latin America	2015		96.2	99.0
Stratford	U.S.A., CT	North America	2015		99.2	94.0
Mukwonago	U.S.A., WI	North America	2015		94.5	94.6
Charleval	France	Europe - B+H	2014	91.5	96.1	94.9
Poincy	France	Europe - B+H	2014	92.2	96.8	94.5
Verneuil	France	Europe - B+H	2014	91.3	95.9	92.3
Dortmund	Germany	Europe - B+H	2014	92.6	100.0	99.0
Menden	Germany	Europe - B+H	2014	98.9	100.0	96.0
Chieti	Italy	Europe - B+H	2014	97.7	98.9	99.0
Pescara	Italy	Europe - B+H	2014	96.1	96.7	97.0
Torello	Spain	Europe - B+H	2014	93.8	96.5	96.1

TABLE 306-2b LANDFILL FREE TOTALS (METRIC TONS)

Aptar Landfill Free Global Totals	2015	2016	% Variance
To Disposal (Landfill)	932	1,013	8.00
To Recovery (Recycle)	29,117	30,072	3.17
Total	30,049	31,085	3.33

REPORTING REQUIREMENT		APTAR'S RESPONSE
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 currently managed at the site level, with some limited standardization at the regional level. In 2016 the Global EHS Taskforce piloted an EHS compliance audit program in Mukwonago, WI, USA and Suzhou, China. The Taskforce performed a risk analysis to force rank risk priority within all global manufacturing facilities. In January of 2017 Aptar identified a global leader responsible for EHS compliance. Throughout 2017 this individual will implement the EHS compliance program worldwide, focusing first on sites identified as higher risk operations.
307-1	a. Significant fines and non-monetary sanctions for non-compliance with environmental laws and/or regulations	Aptar experienced no significant fines and non-monetary sanctions for non-compliance with environmental laws and/or regulations during the reporting year.
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. This charter will be available on Aptar.com in 8 languages (English, German, French, Italian, Spanish, Portuguese, Russian and Chinese) by yearend 2017.
308-1	a. Percentage of new suppliers that were screened using environmental criteria.	We are piloting our supplier sustainability screening process in North America and Europe. In 2016, we selected a few strategic suppliers to receive a social and environmental screening audit. Additionally, 100% of new suppliers were screened. Other regions also screen suppliers for environmental and social impacts, but these results are currently not consolidated as part of the pilot program.

REPORTING REQUIREMENT		APTAR'S RESPONSE
GRI 308 SUPPLIER ENVIRONMENTAL ASSESSMENT		
308-2	<ul style="list-style-type: none">a. Number of suppliers assessed for environmental impacts.b. Number of suppliers identified as having significant actual and potential negative environmental impacts.c. Significant actual and potential negative environmental impacts identified in the supply chain.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.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>Although we did initially return a few unfavorable results in 2016 as part of our supplier sustainability screening pilot program, upon further investigation and conversation with the suppliers in question we determined the issue to be a problem in the way our scorecard was measuring and assessing the supplier programs, and in how the questions were communicated. Upon further evaluation, these suppliers returned acceptable environmental scores. As a result we are continuously improving upon the screening process in order to standardize globally for more accurate results in the future.</p>

400 Social Topics

REPORTING REQUIREMENT

APTAR'S RESPONSE

GRI 401 EMPLOYMENT

Management Approach

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

The table 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. While new employee hires stayed relatively consistent, employee turnover decreased from 2015 to 2016. This is because a worldwide benchmark of wage policy led to some adjustments in certain regions, increasing employee loyalty in some regions, and including China in particular. We believe these figures to be accurate +/- 10%

- 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.



TABLE 401-1 EMPLOYEE NEW HIRE AND TURNOVER RATES

Region	Type	2016								2015							
		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	66 (2.93%)	64 (2.84%)	42 (1.87%)	24 (1.07%)	8 (0.36%)	128 (5.69%)	76 (3.38%)	204 (9.06%)	65 (2.93%)	47 (2.12%)	28 (1.26%)	17 (0.77%)	3 (0.14%)	101 (4.55%)	59 (2.66%)	160 (7.20%)
	Employee Turnover	35 (1.55%)	39 (1.73%)	42 (1.87%)	28 (1.24%)	45 (2.0%)	116 (5.15%)	73 (3.24%)	189 (8.4%)	24 (1.08%)	32 (1.44%)	32 (1.44%)	28 (1.26%)	45 (2.03%)	99 (4.46%)	62 (2.79%)	161 (7.25%)
West Europe	New Employee Hires	126 (3.26%)	107 (2.77%)	79 (2.05%)	43 (1.11%)	8 (0.21%)	248 (6.43%)	115 (2.98%)	363 (9.42%)	107 (2.79%)	76 (1.98%)	68 (1.78%)	43 (1.12%)	3 (0.08%)	186 (4.86%)	111 (2.90%)	297 (7.75%)
	Employee Turnover	35 (0.91%)	37 (0.96%)	57 (1.48%)	41 (1.06%)	68 (1.76%)	153 (3.97%)	85 (2.20%)	238 (6.17%)	27 (0.70%)	41 (1.07%)	52 (1.36%)	29 (0.75%)	40 (1.05%)	121 (3.16%)	68 (1.77%)	189 (4.93%)
South Europe	New Employee Hires	1 (0.16%)	20 (3.24%)	6 (0.97%)	2 (0.32%)	0 (0%)	20 (3.24%)	9 (1.46%)	29 (4.70%)	3 (0.50%)	7 (1.17%)	1 (0.17%)	2 (0.33%)	1 (0.17%)	10 (1.67%)	4 (0.67%)	14 (2.34%)
	Employee Turnover	0 (0%)	6 (0.97%)	2 (0.32%)	1 (0.16%)	0 (0%)	6 (0.97%)	3 (0.49%)	9 (1.46%)	0 (0.00%)	5 (0.84%)	2 (0.34%)	1 (0.17%)	0 (0.00%)	7 (1.17%)	1 (0.17%)	8 (1.34%)
North America	New Employee Hires	50 (2.53%)	61 (3.09%)	38 (1.92%)	37 (1.87%)	22 (1.11%)	134 (6.78%)	74 (3.75%)	208 (10.54%)	31 (1.59%)	48 (2.46%)	38 (1.94%)	27 (1.38%)	8 (0.41%)	98 (5.01%)	54 (2.76%)	152 (7.77%)
	Employee Turnover	29 (1.47%)	59 (2.99%)	46 (2.33%)	45 (2.28%)	68 (3.44%)	145 (7.34%)	102 (5.16%)	247 (12.51%)	19 (0.97%)	41 (2.10%)	40 (2.05%)	46 (2.35%)	60 (3.07%)	119 (6.09%)	87 (4.45%)	206 (10.54%)
China	New Employee Hires	45 (4.85%)	69 (7.44%)	15 (1.62%)	2 (0.22%)	0 (0%)	73 (7.87%)	56 (6.03%)	129 (13.9%)	134 (13.00%)	181 (17.56%)	29 (2.81%)	9 (0.87%)	0 (0.00%)	219 (21.24%)	134 (13.00%)	353 (34.24%)
	Employee Turnover	61 (6.57%)	106 (11.42%)	28(3.02%)	14 (1.51%)	1 (0.11%)	117 (12.61%)	93(10.02%)	210 (22.63%)	207 (20.08%)	236 (22.89%)	26 (2.52%)	20 (1.94%)	5 (0.48%)	304 (29.49%)	190 (18.43%)	494 (47.91%)
Latin America	New Employee Hires	69 (5.86%)	99(8.41%)	40(3.4%)	16(1.36%)	2(0.17%)	147 (12.49%)	79 (6.71%)	226 (19.2%)	84 (7.33%)	70 (76.11%)	41 (3.58%)	6 (0.52%)	1 (0.09%)	109 (9.51%)	93 (8.12%)	202 (17.63%)
	Employee Turnover	35 (2.97%)	89 (7.56%)	54 (4.59%)	21 (1.78%)	3 (0.25%)	115 (9.77%)	87 (7.39%)	202 (17.16%)	87 (7.59%)	116 (10.12%)	70 (6.11%)	35 (3.05%)	4 (0.35%)	153 (13.35%)	159 (13.87%)	312 (27.23%)
Southeast Asia and India	New Employee Hires	29 (4.59%)	23 (3.64%)	10 (1.58%)	2 (0.31%)	0 (0%)	53 (13.35%)	11 (4.70%)	64 (10.14%)	35 (4.59%)	27 (3.54%)	3 (0.39%)	0 (0.00%)	0 (0.00%)	65 (12.24%)	0 (0.00%)	65 (8.52%)
	Employee Turnover	23 (3.64%)	51 (8.08%)	18 (2.85%)	2 (0.31%)	1 (0.15%)	56 (14.10%)	37 (15.81%)	93 (14.73%)	69 (9.04%)	37 (4.85%)	5 (0.66%)	0 (0.00%)	0 (0.00%)	100 (18.83%)	11 (4.74%)	111 (14.55%)
Aptar Total	New Employee Hires								1223 (10.6%)								1243 (10.78%)
	Employee Turnover								1188 (10.3%)								1481 (12.85%)

REPORTING REQUIREMENT

APTAR'S RESPONSE

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%.
- b. Notice is given to employees in most regions in compliance with the local law, and site-specific agreements reflect these requirements.

TABLE 402-1 NOTICE GIVEN FOR SIGNIFICANT OPERATIONAL CHANGES

Region	2016		2015	
	Minimum number of weeks' notice	Notice period specified in collective agreements	Minimum number of weeks' notice	Notice period specified in collective agreements
Central Europe	4-8 weeks	No	4-8 weeks	No
West Europe	2-12 weeks	Yes	2-12 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


	REPORTING REQUIREMENT	APTAR'S RESPONSE
	GRI 403 OCCUPATIONAL HEALTH AND SAFETY	
	Management Approach The reporting organization shall report its management approach for occupational health and safety using GRI 103: Management Approach.	Historically occupational health and safety is managed at the local level by designees within each Aptar site. Through 2016 a Global EHS Taskforce assembled to suggest a new, consolidated strategy to be implemented in 2017. The Taskforce identified enterprise KPIs, developed a global compliance program, and standardized communications of work-related injuries/illnesses. Aptar identified a Global Environment, Health and Safety leader effective January 1, 2017.
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. We are in process of surveying our sites to understand their EHS management systems and formal joint management-worker health and safety committees, but do not currently have mechanisms in place to report this.
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.	Historically occupational health and safety is managed at the local level by designees within each Aptar site. In 2016 Aptar determined five standard KPIs to measure safety performance globally and sites began reporting metrics through our SAP Business Intelligence system. A gap analysis was performed on the 2015 and 2016 data. More work is needed to train individuals on reporting and record keeping practices, but continuous improvement is already underway.  Please see Table 403-2a and b below. Our safety metrics reporting systems are new as of 2016, and we do not have the capability to report work-related injury/illness data by gender. However, we have provided the data we do have available by region. It is important to note that this data has not been externally verified and more focus is needed to ensure accurate record keeping in all facilities worldwide. Aptar has developed it's own record keeping standards and definitions based off of the U.S. Occupational Safety and Health Administration and OHSAS rules.

TABLE 403-2a LOST TIME FREQUENCY RATE

	2015	2016	% Variation
Beauty + Home	1.66	1.49	-10
Corporate	0.00	0.00	—
Food + Beverage	1.60	1.45	-9
Pharma	1.45	2.05	41
Aptar Total	1.61	1.59	-1

TABLE 403-2a LOST TIME DAYS PER INCIDENT

	2015	2016	% Variation
Beauty + Home	32	36	14
Corporate	0	0	—
Food + Beverage	21	33	60
Pharma	35	48	35
Aptar Total	31	39	24


	REPORTING REQUIREMENT	APTAR'S RESPONSE
	GRI 403 OCCUPATIONAL HEALTH AND SAFETY	
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 Anncey, France, Jundiai, Brazil, and Watertown, CT U.S.A are exposed to more hazards in the process as compared to our other facilities, but we have not observed any increase in incidence or diseases as a result of this activity.
403-4	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.	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.
	GRI 404 TRAINING AND EDUCATION	
	Management Approach The reporting organization shall report its management approach for training and education using GRI 103: Management Approach.	The chart in 404-1 below illustrates the average hours of training per year per employee by region and employee category. The average number of training hours per employee decreased from 2015 to 2016. Prior to 2016 we executed a high volume of training as we moved to one SAP-based ERP system. This one-time activity skews our year-over-year training indicator. Omissions: In 2015 Latin America was not tracking the number of hours per gender or employee category. Instead, the total number of training hours for that region is reported. Furthermore, we are currently moving all regions into a more robust, online training system. In the future we will be able to provide more transparency around our training hours, but we have chosen not to report the data by gender as we are not confident in the accuracy of the information we received through our existing training hours reporting process.
404-1	a. Average hours of training that the organization's employees have undertaken during the reporting period, by: i. Gender; ii. Employee category.	Please see Table 404-1 below. Our definitions of these employee categories are provided in the Appendix . 

TABLE 404-1 AVERAGE TRAINING HOURS

Region	2016			2015		
	M&P Employees ¹	Other Employees ¹	All Employees	M&P Employees ¹	Other Employees ¹	All Employees
Central Europe	12.08	8.05		17.70	8.30	
West Europe	17.08	12.46		20.97	13.35	
South Europe	28.48	20.95		32.9	32.20	
North America	19.00	14.60		18.00	17.62	
China	24.40	21.91		32.26	12.02	
Latin America	26.87	46.72		Total 44,487 (currently unavailable by categories)		
Southeast Asia and India	25.00	15.60		23.80	32.20	
Aptar Total			16.54			17.81

¹ See [Appendix](#) for definitions

REPORTING REQUIREMENT		APTAR'S RESPONSE
GRI 404 TRAINING AND EDUCATION		
404-2	a. Type and scope of programs implemented and assistance provided to upgrade employee skills.	Information about the training programs offered through Aptar Corporate University and details of new offerings that were launched in 2016 are included on page 11 .
	b. Transition assistance programs provided to facilitate continued employability and the management of career endings resulting from retirement or termination of employment.	
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.	Information about employee development and succession planning is provided on page 11 .
GRI 406 NON-DISCRIMINATION		
Management Approach The reporting organization shall report its management approach for non-discrimination using GRI 103: Management Approach.		As detailed on page 4 of 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. While mechanisms to report issues to the Compliance Officer (anonymously or identified) existed in the past, the new system enables us to more efficiently track, analyze and report.
406-1	a. Total number of incidents of discrimination during the reporting period.	a. As of the date the system launched, Aptar did not receive any substantiated complaints concerning discrimination.
	b. Status of the incidents and actions taken with reference to the following: i. Incident reviewed by the organization; ii. Remediation plans being implemented; iii. Remediation plans that have been implemented, with results reviewed through routine internal management review processes; iv. Incident no longer subject to action.	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.		The percentage of total employees covered by collective bargaining agreements in North America decreased from 2015 to 2016. This is because our facility in Stratford, CT closed one manufacturing line, resulting in a decrease in headcount which in turn impacted the regional percentage. 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 evident of new Sustainable Purchasing Charter .

REPORTING REQUIREMENT		APTAR'S RESPONSE
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 evident of new Sustainable Purchasing Charter .
GRI 412 HUMAN RIGHTS ASSESSMENT		
Management Approach The reporting organization shall report its management approach for human rights assessment using GRI 103: Management Approach.		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.
GRI 414 SUPPLIER SOCIAL ASSESSMENT		
Management Approach The reporting organization shall report its management approach for supplier social 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. This charter will be available on Aptar.com in 8 languages (English, German, French, Italian, Spanish, Portuguese, Russian and Chinese) by yearend 2017.

REPORTING REQUIREMENT		APTAR'S RESPONSE
GRI 414 SUPPLIER SOCIAL ASSESSMENT		
414-1	New suppliers that were screened using social criteria.	We are piloting our supplier sustainability screening process in North America and Europe. In 2016, we selected a few strategic suppliers to receive a social and environmental screening audit. Additionally, 100% of new suppliers were screened. Other regions also screen suppliers for environmental and social impacts, but these results are currently not consolidated as part of the pilot program.
414-2	Negative social impacts in the supply chain and actions taken.	Although we did initially return a few unfavorable results in 2016 as part of our supplier sustainability screening pilot program, upon further investigation and conversation with the suppliers in question we determined the issue to be a problem in the way our scorecard was measuring and assessing the supplier programs, and in how the questions were communicated. Upon further evaluation, these suppliers returned acceptable social scores. As a result we are continuously improving upon the screening process in order to standardize globally for more accurate results in the future.
GRI 415 PUBLIC POLICY		
Management Approach The reporting organization shall report its management approach for public policy using GRI 103: Management Approach.		
		Aptar does not associate with any political groups, nor does the company make any political contributions, either directly or indirectly.
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.	Not applicable
GRI 416 CUSTOMER HEALTH AND SAFETY		
Management Approach The reporting organization shall report its management approach for customer health and safety using GRI 103: Management Approach.		
		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.
416-1	Assessment of the health and safety impacts of product and service categories.	100% of Aptar products are assessed for health and safety impacts and improvement.
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.

REPORTING REQUIREMENT		APTAR'S RESPONSE
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.
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: 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
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.
417-3	Incidents of non-compliance concerning marketing communications.	Aptar experienced no significant incidents of non-compliance concerning marketing communications during the reporting year.
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 customer privacy. We do not disclose or use personal customer information for any purposes other than those agreed upon, and we seek written permission from customers before publishing any identifying stories, results or quotations.
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.
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.
419-1	a. Significant fines and non-monetary sanctions for non-compliance with laws and/or regulations in the social and economic area in terms of: 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.	a. Aptar has not identified any significant fines for non-compliance with laws and/or regulations. 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

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 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 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.



Matching Aptar Site Naming Convention Across Multiple Metric And Reporting Systems

All of our manufacturing facilities report sustainability metrics through an online collection system. This system uses slightly different naming conventions than the systems used to collect data for the annual report, as illustrated in the reference table below. Also, as explained in 403-2, we audited 2015 and 2016 safety metrics as reported within multiple systems with intent to use only one system in the future.

Segment	Sustainability Region	Country	Site name used in 2016 SAP BI – Sustainability Module	Site name used in 2016 SAP BI – Safety Module	Site name used on 2016 HR Regional Spreadsheets	Site name use in 2016 Annual Report	Site name used in 2015 Annual Report
Beauty + Home	EU - B+H	France	Aptar Annecy	Aptar Annecy	Annecy	Annecy	Annecy
Beauty + Home	SEA	India	Aptar Bahadurpally	Aptar Bahadurpally	Hyderabad	Hyderabad	Hyderabad
Beauty + Home	EU - B+H	Ireland	Aptar Ballinasloe	Aptar Ballinasloe	Ballinasloe	Ballinasloe, County Galway	Ballinasloe, County Galway
Pharma	EU - Pharma	Germany	Aptar Boehringer	Aptar Boehringer	Radolfzell + Eigeltingen	Böhringen	Böhringen
Pharma	EU - Pharma	France	Aptar Brecey	Aptar Brecey	Brecey	Brecey	Brecey
Beauty + Home	LATAM	Brazil	Aptar Cajamar	Aptar Cajamar	Aptar Cajamar	Cajamar	Cajamar
Beauty + Home	LATAM	Colombia	Aptar Cali	Aptar Cali	Aptar Cali	Cali	(not included)
Beauty + Home	EU - B+H	France	Aptar Charleval	Aptar Charleval	Charleval	Charleval	Charleval
Beauty + Home	EU - B+H	Italy	Aptar Chieti	Aptar Chieti	Chieti	San Giovanni Teatino (Chieti)	San Giovanni Teatino (Chieti)
Beauty + Home	SEA	Thailand	Aptar Chonburi	Aptar Chonburi	Thailand	Chonburi	Chonburi
Beauty + Home	SEA	Indonesia	Aptar Cikarang Bekas	Aptar Cikarang Bekas	Indonesia	Cikarang, Bekasi	Cikarang, Bekasi
Food + Beverage	EU - F+B	Czech Republic	Aptar Ckyne	Aptar Ckyne	Ckyne	Ckyne	Ckyne
Pharma	North America	USA	Aptar Congers	Aptar Congers	Congers	Congers, New York	Congers, New York
Beauty + Home	EU - B+H	Germany	Aptar Dortmund	Aptar Dortmund	Dortmund	Dortmund	Dortmund
Beauty + Home	North America	USA	Aptar Eatontown	Aptar Mega Pumps	(new as of 2016)	Eatontown, New Jersey	(new as of 2016)
Pharma	EU - Pharma	Germany	Aptar Eigeltingen	Aptar Eigeltingen	Radolfzell + Eigeltingen	Eigeltingen	Eigeltingen
Food + Beverage	EU - F+B	Germany	Aptar Freyung	Aptar Freyung	Freyung	Freyung	Freyung
Pharma	EU - Pharma	France	Aptar Granville	Aptar Granville	Granville	Granville	Granville
Beauty + Home	SEA	India	Aptar Himachal	Aptar Himachal	Baddi	Himachal Pradesh	Himachal Pradesh
Beauty + Home	SEA	India	Aptar Jeedimetia	Aptar Jeedimetia	Hyderabad	Hyderabad	Hyderabad
Beauty + Home	LATAM	Brazil	Aptar Jundiai	Aptar Jundiai	Aptar Jundiai	Jundiai	Jundiai
Beauty + Home	EU - B+H	France	Aptar Le Neubourg	Aptar Le Neubourg	Le Neubourg	Le Neubourg	Le Neubourg
Pharma	EU - Pharma	France	Aptar Le Vaudreuil	Aptar Le Vaudreuil Up1	Le Vaudreuil	Le Vaudreuil	Le Vaudreuil
Pharma	EU - Pharma	France		Aptar Le Vaudreuil Up2	Le Vaudreuil	Le Vaudreuil	Le Vaudreuil
Pharma	EU - Pharma	France		Aptar Le Vaudreuil Up3	Le Vaudreuil	Le Vaudreuil	Le Vaudreuil
Pharma	EU - Pharma	France		Aptar Le Vaudreuil Up4	Le Vaudreuil	Le Vaudreuil	Le Vaudreuil
Pharma	EU - Pharma	France		Aptar Val De Reuil	Val de Reuil	Le Vaudreuil	Le Vaudreuil
Food + Beverage	EU - F+B	United Kingdom	Aptar Leeds	Aptar Leeds	Leeds	Leeds, England	Leeds, England
Beauty + Home	North America	USA	Aptar Libertyville	Aptar Libertyville	Libertyville	Libertyville, Illinois	Libertyville, Illinois
Food + Beverage	North America	USA	Aptar Lincolnton	Aptar Lincolnton	Lincolnton	Lincolnton, North Carolina	Lincolnton, North Carolina
Beauty + Home	EU - B+H	Spain	Aptar Madrid	Aptar Madrid	Madrid	Madrid	Madrid
Beauty + Home	LATAM	Brazil	Aptar Maringa	Aptar Maringa	Aptar Maringa	Maringá Paraná	Maringá Paraná
Beauty + Home	EU - B+H	Germany	Aptar Menden	Aptar Menden	Menden	Menden	Menden

Segment	Sustainability Region	Country	Site name used in 2016 SAP BI – Sustainability Module	Site name used in 2016 SAP BI – Safety Module	Site name used in 2016 HR Regional Spreadsheets	Site name used in 2016 Annual Report	Site name used in 2015 Annual Report
Pharma	EU - Pharma	Switzerland	Aptar Mezzovico	Aptar Mezzovico	Mezzovico	Mezzovico	Mezzovico
Food + Beverage	North America	USA	Aptar Midland (LMS)	Aptar Midland (LMS)	Midland	Midland, Michigan	Midland, Michigan
Corporate	EU - F+B	United Kingdom	(non-manufacturing)	Aptar Milton Keynes	(included with Leeds)	(non-manufacturing)	(non-manufacturing)
Beauty + Home	North America	USA	Aptar Mukwonago	Aptar Mukwonago	Mukwonago	Mukwonago, Wisconsin	Mukwonago, Wisconsin
Pharma	SEA	India	Aptar Mumbai	Aptar Mumbai	Mumbai Pharma	Mumbai	Mumbai
Beauty + Home	EU - B+H	France	Aptar Oyonnax 1501	Aptar Oyonnax	Oyonnax	Oyonnax	Oyonnax
Beauty + Home	EU - B+H	Italy	Aptar Pescara	Aptar Pescara Assembly	Pescara	Manoppello	Manoppello
Beauty + Home	EU - B+H	Italy		Aptar Pescara Moulding	Pescara	Manoppello	Manoppello
Beauty + Home	EU - B+H	France	Aptar Poincy	Aptar Poincy	Poincy	Poincy	Poincy
Beauty + Home	LATAM	Mexico	Aptar Queretaro	Aptar Queretaro	Aptar Queretaro	Queretaro	Queretaro
Beauty + Home	North America	USA	Aptar Stratford	Aptar Stratford	Stratford	Stratford, Connecticut	Stratford, Connecticut
Beauty + Home	NEA	China	Aptar Suzhou	Aptar Suzhou BH	China	Suzhou	Suzhou
Food + Beverage	NEA	China		Aptar Suzhou FB	China	Suzhou	Suzhou
Pharma	NEA	China		Aptar Suzhou PHA	China	Suzhou	Suzhou
Beauty + Home	EU - B+H	Spain	Aptar Torello	Aptar Torello	Torello	Torello	Torello
Beauty + Home	North America	USA	Aptar Torrington	Aptar Torrington	Torrington	Torrington, Connecticut	Torrington, Connecticut
Beauty + Home	LATAM	Argentina	Aptar Tortuguitas	Aptar Tortuguitas	Aptar Tortuguitas	Tortuguitas	Tortuguitas
Beauty + Home	LATAM	Argentina	Aptar Varela	Aptar Varela	Aptar Varela	Florencio Varela	Florencio Varela
Beauty + Home	EU - B+H	France	Aptar Verneuil	Aptar Verneuil	Verneuil	Verneuil Sur Avre	Verneuil Sur Avre
Pharma	EU - Pharma	France	(included with Stelmi)	Aptar Villepinte	Villepinte	(included with Stelmi)	(included with Stelmi)
Beauty + Home	EU - B+H	Germany	Aptar Villingen	Aptar Megaplast (36)	(new as of 2016)	Villingen-Schwenningen	(new as of 2016)
Beauty + Home	EU - B+H	Germany		Aptar Megaplast (29)	(new as of 2016)	Villingen-Schwenningen	(new as of 2016)
Beauty + Home	EU - B+H	Russia	Aptar Vladimir	Aptar Vladimir	Vladimir	Vladimir	Vladimir
Beauty + Home	North America	USA	Aptar Watertown	Philson	Philson	Watertown, Connecticut	Watertown, Connecticut
Beauty + Home	North America	USA	Cary Campus	Aptar Cary North	Cary North	Cary, Illinois	Cary, Illinois
Beauty + Home	North America	USA		Aptar Cary South	Cary	Cary, Illinois	Cary, Illinois
Beauty + Home	North America	USA		Aptar McHenry Assembly	McHenry	McHenry, Illinois	McHenry, Illinois
Beauty + Home	North America	USA		Aptar McHenry Moulding	McHenry	McHenry, Illinois	McHenry, Illinois
Corporate	Not included	USA	(non-manufacturing)	Aptar Crystal Lake	(not included)	(non-manufacturing)	(non-manufacturing)
Corporate	Not included	France	(non-manufacturing)	Aptar Louveciennes	Louveciennes	(non-manufacturing)	(non-manufacturing)
Pharma	Not included	USA	(not material)	Aptar Next Breath	(included with Congers)	(non-manufacturing)	(non-manufacturing)



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