

## Accessibility Policy (ONT)

**ER-ONT-01**

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### Purpose

Graphic Packaging is committed to providing an accessible and inclusive environment for all individuals. We uphold the principles of dignity, independence, integration, and equality of opportunity for people with disabilities and comply with the requirements of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA). No person with a disability will be denied access to our goods, services, facilities, or employment opportunities on the basis of disability. We are committed to treating people with disabilities with respect and in a manner that allows them to maintain their dignity and independence. We are also committed to complying with the Ontario Human Rights Code by providing accommodations for disabilities to the point of undue hardship and ensuring that our accessibility standards are compliant with all applicable laws and regulations.

### Scope

This Policy applies to all employees, customers, suppliers, and visitors of Graphic Packaging International, Canada, ULC's Ontario facilities. This Policy also applies to those who interact with the public and/or other third parties on behalf of Graphic Packaging in Ontario and to the Company's delivery of products and services in Ontario. Where this Policy conflicts with applicable laws, regulations or collective bargaining agreements, the latter will prevail.

### Definitions

**Assistive Device** means a technical aid, communication device, or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them, such as a wheelchair, walker, or a personal oxygen tank, and that might assist in hearing, seeing, communicating, moving, breathing, remembering, or reading.

**Confidential Information** may include, but is not necessarily limited to, all information concerning or related to the business, operations, results of operations, assets and affairs of Graphic Packaging, including, but not limited to, financial and accounting information, budgets, projections, forecasts, business plans, operating methods, business strategies, product and service information, product plans, product specifications, product designs, manufacturing and other processes, machines, plans, drawings, concepts, research and development data and materials, systems, techniques, trade secrets, intellectual property, software programs and works of authorship, engineering information (technical and non-technical), know-how, marketing and distribution plans, planning data, marketing strategies, price lists, inventions, market studies, employee lists, investor information,

supplier lists, customer and prospect lists, employee lists, employee personal information, and supplier and other customer information and data. Confidential Information also includes any information provided to Graphic Packaging by third parties that Graphic Packaging is obligated to keep confidential. Confidential Information includes not only the information itself, but also all documents containing such information, and any such information maintained in electronic or other form. Confidential Information does not include information that (1) has been voluntarily disclosed to the public by GPI, except where such public disclosure has been made by the employee without authorization from GPI; (2) has been independently developed and disclosed by others without the use of or reference to Confidential Information; or (3) which has otherwise entered the public domain through lawful means.

**Guide Dog** means a highly trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the Blind Persons' Rights Act, to provide mobility, safety, and increased independence for people who are blind.

**Service Animal** means an animal that is used by a person with a disability for reasons relating to his or her disability where is it (a) readily apparent that the animal is being used for reasons related to the person's disability as a result of visual indicators such as a vest or harness worn by the animal; or (b) a physician or nurse has confirmed in writing that the animal is necessary. A service animal is not a pet.

**Support Person** means, in relation to a person with a disability, another person who accompanies him or her to help with communication, mobility, personal care or medical needs or with access to goods or services.

## **Policy Details**

### **Customer and Visitor Access to the Facility**

#### **Accessible Customer Service**

The Company will provide goods, services, and facility access to customers, suppliers, and other visitors with disabilities in a manner that respects their dignity and independence. We will communicate with people with disabilities in ways that consider their disabilities, including providing alternate communication methods or assistance as needed. Employees will receive guidance on appropriate interaction, such as speaking clearly, facing the person, and using written notes or assistive communication devices when required. We will not draw unnecessary attention to a person's disability and will always ask how we can best assist, rather than assume needs. Our goal is to offer integrated services – people with disabilities will be able to obtain and use our products and services alongside others, unless an alternate arrangement is necessary to enable access. Everyone will be given equal opportunity to

benefit from our offerings, and no one will be charged higher fees or denied service due to a disability.

### *Use of Assistive Devices*

Customers, suppliers, and other visitors with disabilities may use their own assistive devices as required when accessing Company facilities or services. This includes mobility aids (wheelchairs, walkers, canes), communication devices, hearing aids, screen readers, or any other assistive technology required. Human Resources and managers will be trained to accommodate and, where possible, to assist with the use of assistive devices upon request. In cases where the assistive device presents a health and safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access, up to the point of undue hardship.

### *Service Animals*

The Company welcomes Guide Dogs and other Service Animals in its administrative offices. However, Guide Dogs and other Service Animals are not permitted in the manufacturing production area or in warehouse areas where powered industrial vehicles operate, unless otherwise provided by law, as this could present a serious safety risk. Where Guide Dogs and Service Animals are prohibited pursuant to this Policy or applicable law, the Company will offer alternative methods to enable the person with a disability to access goods and services, such as the assistance of an employee to facilitate the delivery of goods and services.

Company managers may respectfully ask if an animal is a Guide Dog or Service Animal and will not ask the nature of the person's disability or purpose of the animal.

The care and control of Guide Dogs and Service Animals are the sole responsibility of the customer or third-party who owns it. As a courtesy, Company employees may ask whether the animal requires water, may designate an area in which the service animal can relieve itself, or ask whether they can be of assistance pertaining to the service animal.

If a Guide Dog or Service Animal becomes out of control, causing a clear disruption or a threat to the health and safety of other, and the animal's behavior is not corrected by the owner, a person with a disability can be asked to remove their service animal from the premises.

### Support Persons

A person with a disability accompanied by a Support Person will be allowed to have that person accompany them on any parts of our premises open to the public, or as otherwise approved by appropriate Company management. Where appropriate, Support Persons may be required to wear personal protective equipment for their own health and safety. In situations where the Company's Confidential Information might be discussed, the Company may require the Support Person to sign a confidentiality or non-disclosure agreement before discussing or otherwise disclosing any such Confidential Information. The Company will assume that a customer, supplier or other visitor has consented to the disclosure of that customer, supplier, or visitor's confidential information unless the owner of the confidential information indicates otherwise.

### Physical Access to Facilities

The Company's facilities are generally not open to the public, but we will comply with the Ontario Building Code's accessibility requirements and the AODA Design of Public Spaces Standards to the extent they apply to our facilities.

### Notice of Temporary Disruptions

In the event of a planned or unexpected disruption to facilities or services usually used by people with disabilities (for example, an elevator outage, accessible washroom closure, ramp under repair, or assistive technology being unavailable), The Company will provide timely notice to those impacted. The notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services available (if any). Notices will be posted in conspicuous places at the facility (e.g. at the affected location and main entrance), and we may also use other communication methods as appropriate (such as email or phone messages to scheduled visitors). If the disruption is unexpected (e.g. an equipment failure), we will post the notice as soon as possible and make every effort to inform visitors on-site.

## **Employee Accessibility and Accommodations**

### Workplace Accommodation Policy

The Company is dedicated to providing an inclusive and accommodating work environment for all employees. In accordance with the Ontario Human Rights Code and AODA Employment Standards, we will take steps to prevent and remove barriers to employment for people with disabilities and provide reasonable accommodations for their needs. Employees with disabilities (whether present at hiring or acquired during employment) are

entitled to accommodations that enable them to perform their job duties and fully participate in the workplace, up to the point of undue hardship. We have established a Disability Accommodation Policy and Procedure for employees to request workplace accommodations. This Policy is communicated to all employees and involves the employee (and if needed, applicable medical or other expert representatives) in developing appropriate solutions. Accommodation requests will be handled promptly, confidentially, and on an individualized basis.

Upon hire and at regular intervals, we inform all employees about our policies for supporting employees with disabilities, including how to request accommodations. Managers and Human Resources business partners are trained in fulfilling our duty to accommodate. When an employee makes an accommodation request, we will consult with them to understand the specific needs and limitations and then identify possible accommodations. Examples of workplace accommodations could include adjustments to workstation ergonomics (e.g. special chairs or adjustable-height tables), assistive technology or software (screen readers, voice recognition software, magnification tools), flexible work hours or modified duties, accessible formats for workplace documents, sign language interpretation for meetings, or providing a temporary support person/colleague for certain tasks. All accommodations will be documented and reviewed on a regular basis or when circumstances change. The individual's privacy will be respected and information about their accommodation or disability will be shared only with those necessary for implementing the accommodation (and with the employee's consent). If an accommodation is not feasible or would cause undue hardship, we will explain the decision to the employee and explore alternative solutions.

### Individual Accommodation Plans

The Company will develop and maintain written individual accommodation plans for employees with disabilities, in accordance with the process required by the AODA's Employment Standard. The process for creating an accommodation plan includes the employee's participation, an assessment of accommodation needs on an individual basis, consultation with medical or other experts if needed (at the company's expense), and the option for the employee to have a representative join in the development of the plan. Each accommodation plan will be documented and will include: a description of the accommodations to be provided, timelines for implementation, emergency response information (if applicable), and details of when/how the plan will be reviewed. If an accommodation request is denied, the company will provide the employee with written reasons for the denial. All documentation will be kept confidential in compliance with privacy laws, and we will provide the plan in an accessible format to the employee.

### Return to Work Process

For any employee who has been absent from work due to a disability (whether occupational injury/illness or non-work-related) and requires accommodations to return to work, the Company will develop a documented return-to-work process as required by the AODA. This process outlines the steps we will take to facilitate a safe and timely return to work, including consulting with the employee about their needs, obtaining relevant medical information about limitations (not diagnosis details, only functional abilities), and implementing suitable accommodations or modified duties. The return-to-work plan will form part of the employee's individual accommodation plan, if one exists, or will be created in a similar manner if not. We will work closely with the employee, healthcare providers, and workers' compensation representatives (if applicable) to ensure that the return-to-work strategy is effective and that the employee is supported during the transition back to work.

### Workplace Emergency Response for Employees

In compliance with the AODA Employment Standard, The Company will provide individualized workplace emergency response information to any employees with disabilities who may need assistance in an emergency, if the disability is such that individualized information is necessary and we are aware of the need for accommodation. This means that if an employee has a disability (temporary or permanent) that could affect their ability to safely evacuate or respond to a workplace emergency, we will work with that employee to develop an emergency plan tailored to their needs. For example, if an employee with a mobility impairment works on an upper floor, the plan may designate specific colleagues or wardens to assist them in reaching a safe refuge area during an evacuation. With the employee's consent, the individualized emergency plan will be shared with those designated to help (such as a floor fire marshal or teammate), to ensure they are aware of how to assist. We will provide this emergency response information as soon as we become aware of the need for it and will review the individualized plan whenever the employee's location, needs, or our general emergency procedures change. Additionally, any general emergency information (such as evacuation routes, alarm procedures, or safety videos) that is provided to all employees will also be made available to employees with disabilities in accessible formats or with communication supports upon request. For instance, if emergency instructions are posted on bulletin boards, an employee with low vision can request those instructions in large print or an electronic format. Through these measures, we ensure that employees with disabilities have the information and support they need to react safely in emergencies.

## **Accessible Employment Practices**

### **Recruitment and Hiring**

The Company is an equal opportunity employer and will ensure that our recruitment and hiring processes are accessible. We will notify applicants, employees, and the public about the availability of accommodations for applicants with disabilities in our job postings and on our recruitment website. If a job applicant requests accommodation, we will consult with them to arrange suitable measures that consider their needs (such as providing extended time for a test, an accessible interview location, documents in alternative formats, or assistive technology for assessments). All employees involved in talent acquisition (i.e., hiring managers, recruiters), etc. will be trained to respond to such requests promptly and effectively.

When making an offer of employment to a successful candidate, we will notify them about our policies for accommodating employees with disabilities (for instance, in the offer letter or orientation materials). This ensures that new hires are aware of our commitment to workplace accessibility and know how to request any needed support from the outset.

### **Informing Employees of Supports**

As part of our onboarding process, new employees will be informed of the Company's policies on accessibility and accommodations. We will provide this information in a format that is accessible to the individual if required (for example, a new hire with a visual impairment can receive the employee handbook in an electronic text format for use with a screen reader). We also communicate to all employees whenever there are changes to existing accessibility or accommodation policies. This ongoing communication ensures everyone is aware of the supports available.

### **Performance Management, Career Development, and Redeployment**

The Company will take into account the accessibility needs of employees with disabilities, as well as any individual accommodation plans, when conducting performance management, providing career development opportunities, or considering redeployment of employees. This means that our performance review processes will be designed to be accessible (e.g. if an employee's disability affects communication, we may accommodate the format or timing of reviews) and that managers will consider whether any accommodations are needed to allow the employee to perform at their best during evaluations. When providing feedback or coaching, supervisors will ensure that it is delivered in a way that meets the employee's communication needs (for instance, providing



written summaries of meetings for an employee with memory-related disability, or using plain language).

For career development and advancement (such as promotions, transfers, professional development training, or new responsibilities), we will not deny opportunities to employees on the basis of disability. We will consider what accommodations might be necessary for an employee with a disability to take on new roles or assignments and provide those accommodations so that they have an equal chance to succeed. Similarly, in situations of redeployment (reassigning employees to other roles, e.g. due to restructuring), we will review the individual's accommodation needs and ensure the new role is suitable and accommodations are put in place as needed. Our aim is to support the growth and mobility of employees with disabilities within the company, ensuring they have equitable access to training programs, mentorship, and advancement opportunities.

### *Training and Awareness for Employees*

All employees who participate in developing our policies or providing services on behalf of the Company will receive training on Ontario's accessibility laws and disability-related obligations. In accordance with the AODA and its regulations, we will provide training on the requirements of the accessibility standards and on the Ontario Human Rights Code as it pertains to persons with disabilities. This training is mandatory for employees at all levels and in all departments. New employees will receive training as soon as practicable after hire (e.g. during orientation), and all employees will be re-trained or provided refresher training when policies change or as legislation is amended. We also require that contractors or others providing services on our behalf in Ontario have appropriate AODA training.

Training will include:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and this Policy;
- How to service, interact and communicate with people with various types of disabilities;
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- What to do when a person with a disability is having difficulty accessing Graphic Packaging's goods and services; and
- Applicable employees will also be trained when material changes are made to our Policy.



The Company will retain a record of training that includes the dates training was provided and the number of employees who attended the training.

### **Information and Communications Accessibility**

The Company is committed to ensuring that information and communications are provided in accessible formats that meet the needs of people with disabilities.

#### **Accessible Formats and Communication Supports**

The Company will ensure that its process for receiving and responding to feedback respects the accessible communication needs of persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. This will be done in a timely manner that takes into account the person's accessibility needs due to disability. The Company will consult with the individual making the request in determining the suitability of an accessible format or communication support.

#### **Company Website and Web Content**

We understand the importance of accessible digital information. The Company will ensure that our public websites and web content conform to the Web Content Accessibility Guidelines (WCAG) 2.2 at Level AA. We are committed to maintaining this standard and updating our digital content to comply with newer accessibility guidelines where feasible.

#### **Publicly Available Emergency Information**

If the Company prepares and updates emergency procedures, plans or public safety information and makes the information available to the public, the information will be available in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

#### **Feedback and Communication**

The Company will ensure that its process for receiving and responding to feedback respects the accessible communication needs of persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. This will be done in a timely manner that takes into account the person's accessibility needs due to disability. The Company will consult with the person making the request in determining the suitability of an accessible format or communication support.

Feedback can be provided through multiple channels to accommodate various needs. Individuals can give feedback in person at our facility (by speaking to a manager or Human Resources business partner), by telephone, in writing (handwritten feedback or printed letter), by email, or through an online feedback form on our website. We also accept feedback in alternative formats: for example, someone could send us an audio recording of their feedback or request a personal meeting. Our feedback process permits all of these methods so that people can choose the one easiest for them.

When providing feedback, individuals can choose to do so anonymously or include their contact information if they desire a direct response. All feedback received will be directed to the appropriate management position for review and action.

Individuals can provide feedback or request assistance with our feedback process through the following contact points:

- **In person:** Visit our reception desk at the facility during business hours and ask to speak with a manager or Human Resources.
- **By email:** Send an email to [Accommodations@graphicpkg.com](mailto:Accommodations@graphicpkg.com) with your comments.
- **Via our global Alertline:** <http://gpibusinessconductAlertline.ethicspoint.com>

Please let us know if you require an alternative method or communication support to provide feedback, and we will accommodate your needs. We are committed to using the feedback we receive to improve our practices and remove barriers, thereby continually enhancing accessibility at the Company.

### **Emergency Procedures for Persons with Disabilities**

#### **Accessible Emergency Information**

Any emergency procedures or public safety information that The Company makes available to the public will be provided in an accessible format or with appropriate communication supports, upon request. For example, if we have emergency evacuation instructions or safety guidelines for visitors posted on-site or on our website, a person with a disability can request these in an alternate form. We will, as soon as practicable, provide such information in a way that accommodates the requestor's needs (such as large-print manuals, Braille copies, audio recordings of emergency instructions, or a briefing in person with opportunity for questions). We recognize that emergency information can include printed signs (like exit maps) or multimedia (like safety videos); thus, we aim to ensure that this content is as accessible as possible from the start (e.g. safety videos will have captions, and visual alarms will accompany audible alarms).

Our employees who may be involved in assisting visitors during emergencies (security personnel, fire wardens, etc.) are trained to be aware of the needs of people with disabilities. During an emergency (fire, evacuation, shelter-in-place, etc.), employees will check all areas including washrooms and meeting rooms for anyone needing assistance and will assist visitors with disabilities to reach safety. If visitors use a wheelchair or have mobility restrictions, designated refuge areas (if available) or safe evacuation methods (like evacuation chairs, if provided) will be used according to our emergency plan. Visitors who are Deaf or hard of hearing will be alerted to alarms through visual alarm systems and by employee notification if needed. Visitors who are blind or have low vision will be offered sighted guide assistance by employees to evacuate. Our emergency plans take these needs into account so that everyone, including those with disabilities, can evacuate or find safety effectively.

#### Employee Emergency Response Plans

As noted in the employment section above, we create individualized emergency response plans for employees with known disabilities that might affect their ability to respond to emergencies. Each such plan is tailored to the employee's needs and work location. For instance, if an employee with a hearing impairment might not hear a fire alarm, their plan could involve a strobe pager or having a colleague assigned to inform them of alarms. If an employee has reduced mobility, their plan will detail how and by whom they will be assisted down stairs or to an emergency evacuation chair, etc. These plans are kept confidential but readily available to those assigned to implement them. They are reviewed whenever the employee moves to a new location, whenever their overall accommodation needs change, or when we update our general emergency procedures. By planning in advance, we ensure a coordinated and respectful approach to helping employees who need assistance in crises.

The Company also conducts regular emergency drills (fire drills, etc.), and we will incorporate the accommodation of persons with disabilities in these drills. After drills or actual emergencies, we may solicit feedback from employees (including those with disabilities) to identify any issues in the emergency procedures and improve them. Safety of all employees and visitors is paramount, and accessibility considerations are an integral part of our emergency preparedness.

#### Housekeeping of Accessible Features

We ensure that accessible parking spots are kept available exclusively for those with permits and that they are promptly cleared of snow and ice in winter. Corridors and ramps must not be obstructed by stored items or equipment. We train employees and post reminders about not leaving boxes or pallets on accessible routes and about closing cabinet doors or drawers

that could pose hazards. When floor cleaning or other work is happening that might affect an accessible path, we use signs or barriers to warn and direct people safely.

Building management and all employees are aware of their role in preserving the usability of accessibility features. Should an accessible element be damaged due to misuse or accident, we will investigate and take steps to prevent recurrence (which could include additional signage, employees training, or physical safeguards).

Through diligent maintenance and prompt action on repairs, The Company strives to provide consistent, reliable access to our premises and services. We understand that poorly maintained accessibility features can become barriers; therefore, we treat maintenance as an integral part of our accessibility efforts. In combination with our feedback mechanism, which might alert us to any overlooked issues, this approach helps us ensure that our plant remains welcoming and navigable for everyone, including people with disabilities.

### **Responsibilities and Review**

All Company managers and employees share the responsibility to uphold this Accessibility Policy. We will review this Accessibility Policy at least once every three years, or more frequently if needed, to ensure it remains current and effective. The review will include seeking input from people with disabilities (employees or customers) if possible, and evaluating feedback received through our feedback mechanisms. Updated versions of the policy will be posted on our website and made available to the public.

The Company will also maintain a Multi-Year Accessibility Plan outlining our phased strategy to meet our AODA obligations and to continually improve accessibility. That plan will be posted on our website and provided in accessible formats upon request, and it will be reviewed and updated at least every three years.

### **Questions and Contact Information**

This policy is available to the public via our website and at our facilities. Questions, feedback, or requests for additional information about this Accessibility Policy or about our accessibility programs can be directed to the local Human Resources Business Partner at each facility or, via email, to [Accommodations@graphicpkg.com](mailto:Accommodations@graphicpkg.com).

We encourage anyone who has suggestions on how we can further improve accessibility to contact us. All inquiries will be answered promptly, and if a person requires an alternate format of this policy or any related documents, we will provide it as described above.

## **Related Policies and References**

[Code of Conduct](#)

[Anti-Harassment and Anti-Discrimination Policy](#)

Disability Accommodation Policy and Procedure (ONT)

[Whistleblower Policy](#)

[Multiyear Accessibility Plan \(Canada\)](#)