

Disability Accommodation Policy and Procedure

Graphic Packaging International Canada, ULC will make reasonable accommodations for the known physical or mental limitations of an individual with a disability who is an applicant or an employee, unless such an accommodation would pose an undue hardship to the Company.

Any applicant or employee who requires an accommodation in order to perform the essential functions of the job he or she holds or desires should contact the local Human Resources representative to request such an accommodation. The initial accommodation request can be written or oral and can be made by the employee or by someone else on the employee's behalf. The accommodation request should specify the accommodation the applicant or employee believes he or she needs to do the job. If the requested accommodation is reasonable and will not impose an undue hardship, the Company will make the accommodation in accordance with applicable law. The Company may propose an alternative to the requested accommodation or substitute one reasonable accommodation for another, and the Company retains the ultimate discretion to choose between reasonable accommodations.

It may be necessary to obtain additional medical information to determine if an applicant or an employee's impairment or condition (1) constitutes a disability under applicable law; or (2) can be reasonably accommodated by the Company. As a result, an individual requesting an accommodation may be provided with a Medical Information Request and Verification Form authorizing the release of the applicant or employee's medical information to the Company and asking that individual's healthcare provider to furnish the Company with additional information about the impairment or condition. The Company may also provide the applicant, employee, or healthcare provider with a job description or other documentation of essential functions of the individual's job so that the healthcare provider may provide accurate information about how the impairment or condition at issue impacts the applicant or employee's essential job duties. Individuals requesting accommodations under this policy are expected to fully cooperate with the Company in the accommodation process, including making every effort to provide the Company with necessary medical information to support the accommodation request. Individuals who do not meaningfully cooperate in the accommodation process may delay the provision of accommodation, or frustrate their employment.

Applicants or employees will generally be given **10 business** days to return the Medical Information Request and Verification Form to the local Human Resources representative. Upon receipt, Human Resources will consult with appropriate management regarding whether a reasonable accommodation can be made. An applicant or employee will be notified, in writing, of the approval or denial of the accommodation request as soon as feasible following the submission of any requisite medical documentation.

It is important that employees keep the Company apprised of their primary contact information in case someone from Human Resources or management needs to contact them about the requested accommodation.

No Retaliation

The Company prohibits retaliation against individuals who have a mental or physical impairment and who requests an accommodation under this policy. An applicant or employee that believes he or she has been subject to such retaliation should immediately report the same to their local Human Resources representative, Regional Human Resources Director, or Division Human Resources Director. The Graphic Packaging Business Conduct Alertline toll-free phone number (1.866.898.3750) or website at www.gpibusinessconductalertline.ethicspoint.com also provides a confidential and results-oriented way to report conduct violations related to this policy.