



GRAPHIC PACKAGING INTERNATIONAL CANADA, ULC's

MULTI-YEAR ACCESSIBILITY PLAN

I. INTRODUCTION AND STATEMENT OF COMMITMENT

This Multi-Year Accessibility Plan (the "Plan") applies to Graphic Packaging International Canada, ULC, a subsidiary of Graphic Packaging International, LLC (collectively, "Graphic Packaging").

Graphic Packaging is committed to meeting its obligations under the Accessibility for Ontarians with Disabilities Act (the "AODA") and the related Integrated Accessibility Standards Regulations (the "IASR"). This Plan embodies the Company's Core Values of Respect, Teamwork, Relationships, Accountability, and Integrity and outlines our strategy for removing barriers to accessibility and treating all persons with dignity and respect in a manner that permits them to maintain their independence. Graphic Packaging is committed to meeting the accessibility needs of persons with disabilities in a timely manner.

This Multi-Year Accessibility Plan will be reviewed and updated by Graphic Packaging at least once every five years, as required by the AODA.

II. PAST ACHIEVEMENTS

Graphic Packaging has implemented the following measures to improve opportunities for individuals with disabilities:

- Added an accessibility tool to its primary website, career website, and investor relations website to ensure each conforms with Level AA of the World Wide Web Consortium Content Accessibility Guidelines (WCAG) 2.2, except for exclusions set out in the IASR.
- Specified on its career website and job postings that accommodations are available for applicants with disabilities;
- Revised and updated documents on its primary website to ensure they are accessible.
- Implemented guidance for creating accessible videos and other website content.
- Implemented a Multi-Year Accessibility Plan that is available to the public on Graphic Packaging's websites; available in accessible formats upon request; and includes a statement of commitment to meet the accessibility needs of persons with disabilities in a timely manner.
- Drafted a policy outlining our commitment to accessibility for customers.
- Trained managers and employees on accessibility standards and human rights legislation pertaining to individuals with disabilities.



III. POLICIES AND TRAINING

By January 1, 2026, Graphic Packaging will complete the following activities:

- A. Provide training to all Ontario employees regarding the Company's accessibility policy and its policy outlining our commitment to accessibility for customers; and
- B. Train managers and other applicable stakeholders on the Company's Disability Accommodation Policy and Procedure.

IV. INFORMATION AND COMMUNICATION

By January 1, 2026, Graphic Packaging will add a statement on its website about the availability of accessible formats and communication supports, and, upon request, provide or arrange for the provision of accessible formats in a timely manner.

V. EMPLOYMENT STANDARDS

By January 1, 2026, Graphic Packaging will ensure inclusive employment processes for recruitment, retention, and development within the Company, including:

- A. Distributing the Company's accessibility standards and its Disability and Accommodations Policy to employees during onboarding; and
- B. Ensuring employees are not subject to discrimination or harassment because of their disabilities or any reasonable accommodations provided in furtherance of their performance management and career development.

For more information on this accessibility plan, please contact:

Vince Ghanem
Director, Employee Relations
Graphic Packaging International Canada, LLC
Graphic Packaging International | 7830 Tranmere Drive | Mississauga ON | L5S 1L9
By email: Vince.Ghanem@graphicpkg.com
By telephone: 416-576-5303