

Revised Accessibility Policy (October 01, 2025)

1. PURPOSE

This accessibility policy outlines Winpak's efforts to remove and prevent barriers, implement reasonable accommodations, and provide accessible products, services, and workplaces.

The purpose of this policy is to ensure Winpak offers equitable and inclusive experiences for persons with disabilities and to support compliance with the Accessibility for Ontarians with Disabilities Act, the Accessibility for Manitobans Act, the Americans with Disabilities Act, and other applicable federal, provincial/state, and local accessibility legislation.

2. SCOPE

Winpak is committed to providing an accessible, inclusive, and barrier-free environment for individuals with disabilities by meeting or exceeding applicable accessibility legislation and adopting best practices where legislation does not apply.

Winpak aims to ensure equitable access to its workplaces, products, and services by identifying, removing, and preventing accessibility barriers and by providing reasonable accommodations when needed.

This policy is primarily structured around four key areas of accessibility:

- Employment: Ensuring inclusive and equitable recruitment, retention, and workplace practices.
- Customer Service: Delivering services in a manner that respects the dignity and independence of individuals with disabilities.
- Information and Communication: Providing accessible formats and communication supports.
- Building Infrastructure: Identifying and addressing physical barriers within facilities and public spaces.

2.1. Employment Standards

Winpak is committed to creating an inclusive and accessible work environment by identifying and removing barriers and providing accommodations that support full participation in all stages of employment. This includes but is not limited to recruitment, onboarding, performance evaluations, career development, and return-to-work processes.

Accessibility-related policies and practices will be shared regularly in formats that are usable by all employees. The Human Resources Department will provide reasonable accommodations upon request, in consultation with the employee, while respecting the privacy and confidentiality of personal and health information.

2.2. Recruitment

Winpak is committed to ensuring an equitable and inclusive recruitment process that is accessible to all candidates by removing barriers at every stage of the hiring process, including but not limited to job postings, interviews, assessments, and offer communications.

Job postings will clearly state that accommodations are available upon request, and all recruitment-related communications will be provided in accessible formats when needed. Interview and assessment processes will be designed to minimize barriers and allow candidates to demonstrate their skills and qualifications equitably.

The Human Resources Department will respond promptly to accommodation requests and work with candidates to ensure their needs are met respectfully and confidentially.

2.3. Learning and Development

Winpak is committed to training all employees, contractors, and decision-makers on accessibility legislation and standards. This training reinforces the company's dedication to providing inclusive customer service, promoting equal employment opportunities, maintaining accessible public spaces, and enabling clear, barrier-free communication.

The Human Resources Department will maintain training records, and training will be reviewed annually to remain current with evolving legal requirements, standards, and best practices in accessibility and inclusion.

2.4. Health and Safety

Winpak is committed to fostering a work environment that is healthy, safe, inclusive, and accessible for all employees, contractors, and visitors. The company recognizes that the principles and practices of health, safety, and accessibility are interconnected and must work together to create a secure and supportive workplace. By integrating these principles, Winpak ensures the well-being of every individual, regardless of ability.

Winpak is dedicated to safeguarding individuals who may need assistance during emergencies. Personalized emergency response plans will be created in collaboration with employees who request support and will be reviewed regularly to accommodate any changes.

Emergency procedures and related information will be provided in accessible formats upon request, and staff will receive training to ensure a thorough understanding of inclusive health and safety practices.

2.5. Customer Service

Winpak is dedicated to delivering products and services in a manner that eliminates barriers and upholds the dignity and independence of individuals with disabilities, ensuring equal access and benefits for all customers.

Winpak will actively identify and address accessibility gaps across service delivery, digital platforms, and physical spaces. The company's commitment includes ongoing staff training,

collaboration with people with disabilities, and adherence to relevant accessibility legislation and best practices. Winpak strives for continuous improvement and encourages feedback to keep its services inclusive, responsive, and equitable.

2.6. Information Technology and Communications

Winpak is committed to ensuring that information and communication systems are accessible to all employees and stakeholders. The Company will follow legislative standards when developing, procuring, or updating digital content, systems, and communication tools.

Upon request, information and communications will be made available in accessible formats or with communication supports promptly, in consultation with the individual making the request.

2.7. Public Spaces

Winpak is dedicated to designing, maintaining, constructing, and updating public spaces to meet or exceed regional accessibility standards. The company actively considers the diverse needs of all users to ensure environments are inclusive, welcoming, and accessible.

Accessibility is integrated into every stage of planning and development, with consultation from individuals with disabilities where appropriate. Should disruptions to accessible features, such as elevators, ramps, or routes, occur, Winpak will provide timely notice and, whenever possible, implement alternative solutions to minimize impact. This approach reflects Winpak's ongoing commitment to dignity, independence, and equal access for everyone who uses or visits its facilities.

This policy applies to:

- All employees of Winpak Ltd. and its subsidiaries (collectively, "Winpak" or the "Companies"), including full-time, part-time, temporary, casual, and contract staff, co-op students, interns, and apprentices.
- Customers, visitors, contractors, vendors, service providers, and any individuals external to the Company with whom employees have professional contact through their employment.
- All locations where Winpak operates and where business activities occur, including offices, manufacturing facilities, public spaces, and digital platforms.
- Employment decisions regarding pay, benefits, promotions, transfers, layoffs, discipline, work assignment, work environment, grievance resolution, or any other term, condition, or privilege of employment.
- All aspects of operations relevant to accessibility as outlined above, in accordance with the Accessibility for Ontarians with Disabilities Act, the Accessibility for Manitobans Act, and applicable federal, provincial/state, and local accessibility legislation.

Winpak is committed to investigating all violations of this policy of which it becomes aware, including instances where the person bringing the complaints states that they do not want the company to follow up.

For more information, please [contact us](#).