

Hartmann Canada Accessibility Policy and Multi-Year Plan

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Hartmann Accessibility Policy

Hartmann Canada Inc.

Purpose:

Hartmann Canada Inc. ("Hartmann") is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. This policy outlines Hartmann's commitment to meeting the requirements of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), including the Integrated Accessibility Standards Regulation (IASR), and the Ontario Human Rights Code.

Scope:

This policy applies to all employees, contractors, agents, volunteers, and any individuals who provide goods, services, or facilities on behalf of Hartmann. It also applies to all members of the public who interact with Hartmann.

Definitions:

1. Disability has the same meaning as defined in the Accessibility for Ontarians with Disabilities Act and the Ontario Human Rights Code.
2. Service Animal means an animal that is readily identifiable as being used for reasons related to a person's disability or where documentation from a regulated health professional confirms the need for the animal.
3. Support Person means a person who accompanies a person with a disability to help with communication, mobility, personal care, or access to goods and services.

General Principles:

Hartmann is committed to:

- Treating people with disabilities with respect, dignity, and independence
- Providing equal opportunity and integration
- Removing and preventing barriers
- Meeting accessibility needs in a timely manner

Procedure

1. Customer Service Standard

- a. Assistive Devices – People with disabilities may use their own assistive devices when accessing Hartmann’s goods and services. Where a safety concern exists, reasonable efforts will be made to provide alternative measures to ensure access.
- b. Communication – Hartmann will communicate with people with disabilities in ways that take their disability into account. Accessible formats and communication supports will be provided upon request, in consultation with the individual, and in a timely manner at no additional cost.
- c. Telephone and Electronic Communication – Employees will be trained to communicate clearly and effectively and to offer alternative communication methods such as email when needed.
- d. Service Animals – Service animals are permitted on Hartmann premises where the public is normally allowed, except where excluded by law. If exclusion is required by law, reasonable efforts will be made to provide alternative means of accessing goods or services.
- e. Support Persons – A person with a disability may be accompanied by a support person. Where confidential information is discussed, consent will be obtained before proceeding. If Hartmann requires a support person for health or safety reasons, no fee will be charged.

2. Notice of Temporary Disruptions

- a. Hartmann will provide notice of temporary disruptions to facilities or services used by persons with disabilities.
- b. Notices will include:
 - i. Reason for disruption
 - ii. Anticipated duration
 - iii. Description of alternative services
- c. Notices may be posted at affected locations, entrances, on the company website, or communicated verbally where appropriate.

3. Feedback Process

- a. Hartmann welcomes feedback regarding accessibility and the provision of goods and services.
- b. Feedback may be submitted by:

Mail: Hartmann Canada Inc., 58 Frank Street, P.O. Box 1328, Brantford, ON N3T 5T6

Phone: 519-756-8500

Email: hr_ca@hartmann-packaging.com

- c. Feedback will be reviewed and responded to within 5 business days.

4. Information and Communications Standard

- a. Hartmann will provide or arrange for accessible formats and communication supports for persons with disabilities upon request. This includes public information and emergency procedures. Requests will be handled in consultation with the individual and at no additional cost.

5. Employment Standard

- a. Recruitment
 - i. Hartmann will notify employees and the public that accommodations are available for applicants with disabilities during recruitment and selection.
 - ii. Recruitment Process – applicants will be informed that accommodations are available upon request during interviews or assessments.
- b. Support for Employees
 - i. Notice to Successful Applicants – successful applicants will be informed of Hartmann’s policies for accommodating employees with disabilities.
 - ii. Accessible Formats and Communication Supports for Employees – Hartmann will provide accessible formats and communication supports upon request.
 - iii. Workplace Accommodation Plans – Hartmann will develop individualized accommodation plans for employees with disabilities in consultation with the employee. Any accommodations can be reviewed with Human Resources.
 - iv. Return to Work Process – Hartmann maintains a documented return-to-work process for employees who have been absent due to disability and require accommodation.
 - v. Performance Management, Career Development & Redeployment – Accessibility needs will be considered when

using performance management, career development, and redeployment processes.

- vi. Workplace Emergency Response Information - Hartmann will provide individualized workplace emergency response information to employees with disabilities where required. The information will be reviewed when the employee's accommodation needs change, when the employee's work location changes, and when Hartmann reviews its general emergency response policies.

6. Training

- a. Hartmann will provide training on the Accessibility for Ontarians with Disabilities Act (AODA), the Integrated Accessibility Standards Regulation (IASR), and the Ontario Human Rights Code as it relates to persons with disabilities to:
 - i. All employees
 - ii. Volunteers
 - iii. Contractors
 - iv. Individuals involved in developing policies
- b. Training will be provided as soon as practicable upon hire and whenever policies are updated. Records of training, including dates and attendance, will be maintained.

7. Notice of Availability of documents

- a. This policy and related documents are available upon request in accessible formats. Notices will be posted in conspicuous locations and on Hartmann's website.

Administration

Questions regarding this policy may be directed to:

Human Resources

Hartmann Canada Inc.

Mail: Hartmann Canada Inc., 58 Frank Street, P.O. Box 1328, Brantford, ON N3T 5T6



Phone: 519-756-8500

Email: hr_ca@hartmann-packaging.com

Review

This policy will be reviewed and updated as required to ensure ongoing compliance with legislative requirements.

Multi-Year Accessibility Plan (2026–2031)

Hartmann Canada Inc

Statement of Commitment

Hartmann Canada Inc. (“Hartmann”) is committed to providing a respectful, inclusive, and barrier-free environment for persons with disabilities. This Multi-Year Accessibility Plan outlines the measures Hartmann has in place and the actions it will take between 2026 and 2031 to meet the requirements of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

Purpose

This plan identifies:

- Measures already in place to support accessibility
- Ongoing and future actions to remove and prevent barriers
- Roles and responsibilities for compliance
- Review timelines to ensure continuous improvement

Contact Information

Human Resources

Hartmann Canada Inc.

58 Frank Street, P.O. Box 1328

Brantford, ON N3T 5T6

Phone: 519-756-8500

Email: hr_ca@hartmann-packaging.com

Categories

1. Information and Communications Standards
 - a. Accessible Formats and Communication Supports

Status: Ongoing

Actions (2026–2031):

- Provide accessible formats and communication supports upon request
- Consult with individuals to determine suitable formats

- Review communication practices annually

Responsibility: Human Resources

b. Accessible Websites and Web Content

Status: Ongoing

Actions (2026–2031):

- Maintain compliance with WCAG 2.0 Level AA
- Review accessibility during website updates
- Address identified accessibility issues

Responsibility: Human Resources / IT

2. Customer Service Standard

Status: Ongoing

Actions (2026–2031):

- Maintain accessible customer service policies
- Allow assistive devices and service animals
- Welcome support persons
- Provide notice of temporary service disruptions
- Accept feedback in accessible formats

Responsibility: Human Resources / Customer Service

3. Training

Status: Ongoing

Actions (2026–2031):

- Provide training on the Accessibility for Ontarians with Disabilities Act (AODA), the Integrated Accessibility Standards Regulation (IASR), and the Ontario Human Rights Code as it relates to persons with disabilities to all employees and applicable third parties
- Assign training upon hire and when policies change
- Maintain training records

Responsibility: Human Resources

4. Employment Standards
 - a. Recruitment and Selection

Status: Ongoing

Actions:

- Include accommodation statements in job postings
- Notify applicants of accommodation availability
- Consult with applicants on accommodation needs
- Notify successful applicants of accommodation policies

Responsibility: Human Resources

- b. Accessible Formats and Communication Supports for Employees

Status: Ongoing

Actions:

- Provide accessible formats upon request
- Consult with employees to determine suitable supports

Responsibility: Human Resources

- c. Workplace Emergency Response Information

Status: Ongoing

Actions:

- Develop individualized emergency response plans
- Review plans when locations or needs change
- Share plans with designated assistants (with consent)

Responsibility: Health & Safety

- d. Individual Accommodation Plans

Status: Ongoing

Actions:

- Maintain documented accommodation processes
- Review and update plans as required
- Provide plans in accessible formats

Responsibility: Human Resources / Health & Safety

e. Return to Work

Status: Ongoing

Actions:

- Maintain documented return-to-work procedures
- Integrate accommodation plans
- Support employees through the return-to-work process

Responsibility: Human Resources

f. Performance Management, Career Development and Redeployment

Status: Ongoing

Actions:

- Ensure accessibility considerations are included
- Provide guidance and training to leaders

Responsibility: Human Resources

5. Design of Public Spaces

Status: Ongoing

Actions:

- Comply with Design of Public Spaces Standards when constructing or redeveloping public areas
- Provide notice of service disruptions and alternatives

Responsibility: Maintenance / Health & Safety

6. Governance and Review

This Multi-Year Accessibility Plan will be reviewed at least once every five (5) years or earlier if required by legislative or operational changes.

The Human Resources Department is responsible for maintaining and updating this plan.

The plan will be posted on the company website and made available in accessible formats upon request.

Revision History:

Revision	Description of Change	Date
0	New	
1	Update and Review	January 3, 2017
2	Updated and added a Multi-Year Accessibility Plan (2026–2031)	July 10, 2026