

WestRock Company of Canada Corp.
MULTI-YEAR ACCESSIBILITY PLAN

June 2021

In 2005, the government of Ontario passed the *Accessibility for Ontarians with Disabilities Act* (the “AODA”). The AODA requires that effective January 1, 2014, WestRock Company of Canada Corp. (the “Company”) establish, implement, maintain and document a multi-year accessibility plan which outlines the organization’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements of the Integrated Accessibility Standards (the “IAS”).

This multi-year accessibility plan (the “Accessibility Plan”) applies to the Company’s Ontario, Canada operations. It outlines the Company’s strategy to prevent and remove barriers for persons with disabilities and to address the current and future requirements of the IAS in order that the Company may fulfill its commitment as outlined in the Company’s Integrated Accessibility Standards Policy for Ontario, Canada (the “Policy”).

General Accessibility Standards

Requirement	Responsible Individual/Department	Action	Status
<p>Accessibility Policy</p> <p>Develop, implement and maintain policies governing how the Company achieves or will achieve accessibility through meeting the requirements of the IAS.</p> <p>Statement of organizational commitment to meeting the accessibility needs of persons with disabilities in a timely manner.</p>	<p>Human Resources</p>	<p>Human Resources will create and implement a written policy and a statement of commitment.</p> <p>The policy will be posted on the Company’s website.</p>	<p>Reviewed May 2021 Complete</p>

<p>Prepare one or more written documents describing the policies and make the policies publicly available and provide them in an accessible format upon request.</p>			
<p>Multi-Year Accessibility Plan</p> <p>Establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation</p> <p>Post the accessibility plan on the website and provide the plan in an accessible format upon request.</p> <p>Review and update the accessibility plan at least once every five years.</p>	<p>Human Resources will have primary responsibility for developing and administering the accessibility plan but will consult with other departments as required.</p>	<p>Review the requirements of the IAS and determine how the Company will meet all of the requirements and work towards preventing and removing barriers to accessibility.</p> <p>Post the accessibility plan on the Company's website.</p> <p>Review and update the accessibility plan as often as necessary but at least every 5 years. To be reviewed December 2025.</p>	<p>Reviewed May 2021 Complete</p>
<p>Training</p> <p>Provide training to all existing employees, volunteers and all persons who participate in the development of AODA Policies.</p> <p>Training must include:</p> <ul style="list-style-type: none"> i. the requirements of the IAS; the <i>Human Rights Code</i> as it pertains to persons with disabilities; and ii. the AODA Policies as required by the IAS. <p>Keep a record of the training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.</p>	<p>Human Resources</p>	<p>Determine which training mandated under the IAS is necessary and appropriate for each employee based on his/her particular duties.</p> <p>Training will be conducted through a combination of online modules and in-person training.</p> <p>Additional in-person training will be provided to particular employees as necessary (e.g. additional training for IT personnel on requirements for accessible website).</p>	<p>complete</p>

		Human Resources will maintain records of training.	
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Information and Communication Standards

Requirement	Responsible Individual/Department	Action	Status
<p>Emergency Plans, Procedures or Public Safety Information</p> <p>Provide any emergency plans, procedures or public safety information that it makes available to the public in an Accessible Format or with appropriate Communication Supports, as soon as practicable, upon request.</p>	Human Resources	<p>The Company currently has maps posted on the wall that indicate emergency exits. Visitors are always with a WestRock representative during plant tours.</p> <p>These emergency plans will be made available in an Accessible Format or with Communication Supports upon request. Requests can be directed to Human Resources.</p> <p>Human Resources personnel will familiarize themselves with different types of Accessible Formats and Communication Supports as well as how to provide same.</p>	complete
<p>Feedback</p> <p>Ensure that processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of Accessible Formats and Communications Supports, upon request.</p>	Sales Department and Human Resources	<p>The Company currently send out customer surveys electronically. These customer surveys will be made accessible by providing Accessible Formats and Communication Supports upon request. Requests can be directed to</p>	complete

<p>Notify the public that Accessible Formats and Communications Supports are available in respect of its feedback procedures</p>		<p>the Sales Department who will have received training on how to accommodate such requests.</p> <p>The Company conducts employee engagement surveys. These surveys will be made accessible by providing Accessible Formats and Communication Supports upon request. Requests can be directed to Human Resources who will have received training on how to accommodate such requests.</p>	
<p>Accessible Formats and Communication Supports</p> <p>Upon request, provide or arrange for the provision of Accessible Formats and Communication Supports in order to make its communications or information about the goods, services and/or facilities it offers accessible to persons with disabilities.</p> <p>Provide Accessible Formats and Communication Supports in a timely manner at a cost that is no more than the regular cost charged to other persons and in a manner that takes account the person’s accessibility needs due to disability.</p> <p>Consult with the person making the request when determining the suitability of an Accessible Format or Communication Support and notify the public of the availability of same.</p>	<p>Sales Department</p>	<p>Requests for Accessible Formats and Communication Supports are likely to be directed to the Sales Department.</p> <p>The Sales Department will be trained on the obligation to provide Accessible Formats and Communication Supports and how to do so.</p>	<p>complete</p>

<p>Accessible Websites and Web Content</p> <p>Ensure that, where practicable, a New Internet Website and web content on such site(s) conforms with WCAG 2.0 Level A.</p> <p>By January 1, 2021 ensure that, where practicable, any website or content on that site(s) published after January 1, 2012 conforms with WCAG 2.0 Level AA to the extent required by the IAS.</p>	<p>IT Department</p>	<p>The website that includes WestRock Canada has been continuously updated but it is not yet fully compliant with WCAG 2.0 Level AA. WestRock is of the view that it is not legally required to comply with the web accessibility requirements of the AODA because it does not have direct control over its website. Rather its website is controlled by a division of the Company in the United States. 2014 Compliance report was filed, a Human Resources employee at WestRock was advised by a representative of the Accessibility Directorate that in the circumstance just described, the Canadian entity would not be considered to have direct control over the website within the meaning of the legislation. In any event, WestRock continues to work proactively to make it accessible and compliant with the WCAG standards with its ever-changing web content.</p>	
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Employment Standards

Requirement	Responsible Individual/Department	Action	Status
<p>Recruitment</p> <p>Notify the public and employees about the availability of accommodation for applicants with disabilities in its recruitment processes</p>	Human Resources	<p>Human Resources will develop a notice about the availability of accommodation during the recruitment process.</p> <p>This notice will be included on all external and internal job advertisements. The Company will instruct any external recruiters it engages to include the notice as well.</p>	complete
<p>Recruitment, assessment or selection process</p> <p>Notify job applicants, when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.</p> <p>Consult with an applicant requesting accommodation to provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability</p>	Human Resources	<p>Human Resources will develop a notice about the availability of accommodation during the assessment and selection process.</p> <p>The Company contacts individuals by email or telephone when they are selected to interview for a position. When contacted, applicants will be notified about the availability of accommodation during the assessment and selection process.</p> <p>Human Resources will consult with any applicant requesting accommodation and will endeavour to provide same in manner that takes</p>	complete

		into account the individuals accessibility needs.	
<p>Notice to successful applicants</p> <p>Notify successful applicants of the Company’s policies for accommodating employees with disabilities.</p>	Human Resources	Human Resources will develop a clause to be added to offer letters that will serve to notify successful applicants about the Company’s policies on accommodating employees with disabilities.	complete
<p>Informing employees of supports</p> <p>Inform employees of policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability.</p> <p>Provided to new employees as soon as practicable after commencing employment</p> <p>Provide employees with updated information whenever there is a material change to its policies on the provision of job accommodations for employees with disabilities</p>	Human Resources	<p>Some Company sites will notify employees of supports for employees with disabilities on communication boards. Other Company sites will make this notification through a blast email to employees. Employees will also be notified during training on the AODA.</p> <p>As above, new employees will be notified of these policies in their offer letters.</p> <p>If material changes are made to the Company’s policies Human Resources will determine the best way to communicate such changes to employees at the time.</p>	complete
<p>Accessible Formats and Communication Supports for employees</p> <p>Upon the request of an employee with a disability, provide or arrange for the provision of Accessible</p>	Human Resources & Managers	Managers will be trained on the requirement to provide Accessible Formats and Communication Supports to employees upon request as well as the need to consult with	complete

<p>Formats and Communication Supports in order to ensure that (i) information required by the employee to perform his/her job; and (ii) information generally available to employees in the workplace, is accessible to the employee with a disability.</p> <p>Consult with the employee making the request to determine the suitability of any Accessible Format or Communication Support. However where the needs of an employee with a disability may be accommodated in various different ways, the Company reserves the right to determine the type Accessible Format or Communication Support that will be provided in the circumstances.</p>		<p>the employee to determine how their needs may be met.</p> <p>Managers will be instructed to contact Human Resources where assistance in providing Accessible Formats and Communication Supports is required.</p>	
<p>Workplace emergency response information</p> <p>Provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if the Company is aware of the need for accommodation due to the employee's disability.</p> <p>Provide this information as soon as practicable after becoming aware of the need for accommodation.</p> <p>With the consent of the employee, provide the workplace emergency response information to the person designated by the Company to provide assistance to the employee if the employee needs assistance by reason of disability</p> <p>Review individualized workplace emergency response information when the employee moves to a different</p>	<p>Human Resources & Managers</p>	<p>A notice about the availability of individualized workplace emergency response information was posted on the communication board for hourly employees. Salaried employees were notified via email.</p> <p>Employees were also notified about the availability of individualized emergency response information during AODA training.</p> <p>Managers have received training on the requirement to provide individualized emergency response information to ensure that they notify Human Resources if they become aware of an employee who</p>	<p>complete</p>

<p>location in the organization, when the employee's overall accommodation needs or plans are reviewed and when the company reviews its general emergency response policies.</p>		<p>would require such information. Managers and Human Resources will also receive training on the circumstances that would trigger the need to review individualized emergency response information</p>	
<p>Documented individual accommodation plans</p> <p>Have in place a written process for the development of documented individual accommodation plans for employees with disabilities. The process must include the following elements:</p> <ul style="list-style-type: none"> i. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. ii. The means by which the employee is assessed on an individual basis. iii. The manner in which the Company can request an evaluation by an outside medical or other expert, at its own expense, to assist in determining if accommodation can be achieved and, if so, how accommodation can be achieved. iv. The manner in which the employee can request the participation of a representative from his or her bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining 	<p>Human Resources and Managers</p>	<p>The Company will develop a written process for the development of individual accommodation plans for employees with disabilities that takes into account all of the elements set out in the IAS.</p> <p>Human Resources and managers will receive training on the requirements for creating individual accommodation plans.</p> <p>Human Resources (with the support of the appropriate manager) will be responsible for the creation of documented individual accommodation plans as well as the management of the accommodation process generally.</p>	<p>complete</p>

<p>agent, in the development of the accommodation plan.</p> <p>v. The steps the Company will take to protect the privacy of the employee’s personal information.</p> <p>vi. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>vii. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>viii. The means of providing the individual accommodation plan in a format that takes into account the employee’s accessibility needs due to disability.</p> <p>Where requested, an employee’s individual accommodation plan will include any information regarding the provision of Accessible Formats and Communications Supports.</p> <p>Where required, an employee’s individual accommodation plan will include individualized workplace emergency response information.</p>			
<p>Return to Work Process</p> <p>Have in place a documented a return to work process for employees who have been absent from work due to</p>	<p>Human Resources and Managers</p>	<p>The Company will create a documented return to work process for employees absent due to disability and who require</p>	<p>complete</p>

<p>a disability and who require disability-related accommodations in order to return to work.</p> <p>The return to work process must outline the steps the Company will take to facilitate the employee's return to work and will include documented individual accommodation plans as part of the process</p>		<p>accommodation in order return to work.</p> <p>Human Resources and managers will receive training on this process.</p> <p>Human Resources (with the support of the appropriate manager) will be responsible for administering the return to work process for individual employees and for creating an individual accommodation plan for returning employees where required.</p>	
<p>Performance management</p> <p>Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.</p>	<p>Managers and Human Resources</p>	<p>Managers and Human Resources will receive training on how to take accessibility needs and individual accommodation plans into account when engaging in performance management.</p>	<p>complete</p>
<p>Career development and advancement</p> <p>Take into account the accessibility needs of employees with disabilities as well as any individual accommodation plans when providing career development and advancement to employees with disabilities.</p>	<p>Managers and Human Resources</p>	<p>Managers and Human Resources will receive training on how to take accessibility needs and individual accommodation plans into account when providing career development and advancement opportunities.</p>	<p>complete</p>
<p>Redeployment</p> <p>Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.</p>	<p>Managers and Human Resources</p>	<p>Managers and Human Resources will receive training on how to take accessibility needs and individual accommodation plans into account when redeploying employees.</p>	<p>complete</p>

DESIGN OF PUBLIC SPACES

(The following requirements only apply to public spaces that are newly constructed or redeveloped on and after January 1, 2017.)

Description	Responsible Individual/Department	Action	Status
<p>Exterior Paths of Travel</p> <p>Ensure that any exterior paths of travel, such as outdoor sidewalks and walkways, ramps, stairs and curb ramps that it constructs or redevelops and intends to maintain meet the technical requirements of the Design of Public Spaces Standards.</p>	<p>Maintenance Department</p>	<p>There are no current plans to construct or redevelop any exterior paths of travel. The Maintenance Department will receive training on the requirements of the Design of Public Spaces Standards to ensure that any future construction or redevelopment is done in accordance with applicable accessibility standards.</p>	
<p>Off Street Parking</p> <p>Ensure that when the Company constructs new or redevelops off-street parking facilities that it intends to maintain, the off and on street parking facilities meet the requirements of the Design of Public Spaces Standards.</p>	<p>Maintenance Department</p>	<p>There are no current plans to construct or redevelop any off street parking. The Maintenance Department will receive training on the requirements of the Design of Public Spaces Standards to ensure that any future construction or redevelopment is done in accordance with applicable accessibility standards.</p>	
<p>Obtaining Services</p> <p>Ensure that the Company meets the requirements of the Design of Public Spaces Standards in respect of all newly constructed service counters.</p>	<p>Maintenance Department</p>	<p>There are no current plans to replace the existing service counter. The Maintenance Department will receive training on the requirements of the Design of Public Spaces</p>	

		Standards to ensure that any new service counter meets required accessibility standards.	
<p>Maintenance</p> <p>Ensure accessibility plans include:</p> <ol style="list-style-type: none"> 1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces. 2. Procedures for dealing with temporary disruptions when accessible elements required are not in working order. 		Maintenance plans will be developed as required should the Company redevelop or construct accessible elements in future.	