

	Pride Pak Canada Ltd.	Revision No	A
		Code	P-AODA-001
		EffectiveDate	01/06/2026

AODA ACCESSIBILITY POLICY

Purpose

The purpose of this policy is to establish Pride Pak Canada Ltd.'s commitment to accessibility and to set out how the company will identify, prevent and remove barriers for persons with disabilities in accordance with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and Ontario Regulation 191/11 - the Integrated Accessibility Standards Regulation (IASR). This policy covers all five AODA standards applicable to Pride Pak Canada Ltd. as a large private sector employer with 50+ employees in Ontario.

Scope

This policy applies to all employees, contractors, volunteers, job applicants, customers, suppliers, visitors and any other person who interacts with Pride Pak Canada Ltd. in any capacity. It covers all activities, services, facilities, communications, employment practices and procurement decisions of Pride Pak Canada Ltd. at 6768 Financial Drive, Mississauga, ON L5N 7J6 and any other location where Pride Pak Canada Ltd. conducts business.

Statement of Commitment

Pride Pak Canada Ltd. 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. We are committed to meeting the needs of persons with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and by meeting our requirements under the AODA and the IASR. This commitment applies across all five AODA standards - Customer Service, Information and Communications, Employment, Transportation and Design of Public Spaces - to the extent each standard applies to our operations.

Guiding Principles

Pride Pak Canada Ltd.'s approach to accessibility is grounded in the following four principles as established under the AODA:

- Dignity - We ensure that goods, services, facilities and employment opportunities are provided in a manner that respects the dignity and independence of persons with disabilities. We do not treat persons with disabilities as an afterthought or in a manner that is demeaning or diminishing.
- Independence - We support the independence of persons with disabilities and avoid creating or maintaining practices that foster reliance or dependence where it is not necessary or desired by the person with a disability.
- Integration - We ensure that persons with disabilities are able to benefit from the same goods, services, facilities and employment opportunities as other persons, in the same place and in the same or similar manner, unless an alternative approach is necessary to enable a person with a disability to benefit.
- Equal Opportunity - We ensure that persons with disabilities have an equal opportunity to access our goods, services, facilities and employment opportunities as those without disabilities. We do not impose additional requirements, conditions or limitations on persons with disabilities unless permitted under the AODA.

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Standard 1 - Customer Service Standard

Pride Pak Canada Ltd. is committed to providing accessible goods, services and facilities to all customers, suppliers, corporate auditors including McDonald's Canada representatives, contractors and visitors. In meeting the Customer Service Standard we will:

- Welcome persons with disabilities who are accompanied by a service animal in all publicly accessible areas of our facility, including office and administration areas. Where a service animal cannot accompany a person into a specific area due to a documented food safety requirement under applicable food safety law (for example, direct food contact areas), Pride Pak Canada Ltd. will arrange a reasonable alternative means of accommodation in consultation with the person, such as a designated handler or an alternative route, rather than excluding the person from the area entirely.
- Welcome persons with disabilities who are accompanied by a support person in all publicly accessible areas and will ensure that support persons are not excluded or restricted from accompanying the person with a disability.
- Notify customers, suppliers and visitors in advance where a temporary disruption occurs to accessible services or facilities, including where accessible features at the facility are temporarily unavailable. The notice will include the reason for the disruption, its expected duration and any alternative arrangements available.
- Train all customer-facing employees, supervisors, managers, relevant personnel and anyone who develops or approves policies on how to communicate and interact with persons with disabilities, including persons who use assistive devices or are accompanied by a service animal or support person.
- Provide an accessible feedback process through which customers, suppliers, visitors and any member of the public can provide feedback about how we deliver accessible goods, services and facilities. This process is described in detail in P-AODA-002 Accessible Feedback Mechanism.
- Maintain and implement an accessible feedback process that is available in accessible formats on request.

Standard 2 - Information and Communications Standard

Pride Pak Canada Ltd. is committed to communicating with persons with disabilities in ways that take into account their disability and that remove barriers to accessing information. In meeting the Information and Communications Standard we will:

- Provide information and communications in accessible formats or with appropriate communication support when requested by a person with a disability. This applies to information about our goods, services and facilities, our policies, our job postings and any other information we make publicly available. Accessible formats and communication support will be provided in a timely manner, at no additional cost and in consultation with the person requesting them. This is described in detail in P-AODA-003 Accessible Formats and Communication Supports Procedure.
- Notify the public about the availability of accessible formats and communication support through a notice on the Pride Pak Canada Ltd. website, at the reception area of the facility and in all publicly available materials.
- Ensure that all new and refreshed content on the Pride Pak Canada Ltd. public-facing website (pridepak.com) conforms to the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA to the extent required under the IASR, with the exception of live captions and pre-recorded audio descriptions where technically impracticable.
- Ensure that our Multi-Year Accessibility Plan is published on our website and made available in accessible formats upon request.
- Ensure that educational and training resources and materials are provided in accessible formats where requested.

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Standard 3 - Employment Standard

Pride Pak Canada Ltd. is committed to fair and accessible employment practices that attract, retain and support employees with disabilities at every stage of the employment lifecycle. In meeting the Employment Standard we will:

- Notify all job applicants in our recruitment postings and on our website that accommodations are available for persons with disabilities during the recruitment process, and will provide or arrange for suitable accommodations upon request.
- Notify successful applicants of our accommodation policies for employees with disabilities before or at the time a job offer is made, so that newly hired employees are aware of their rights and the support available to them from day one.
- Inform all employees of our policies for supporting employees with disabilities, including policies relating to job accommodation. New employees will receive this information as soon as practicable after they begin work. All employees will be notified of any changes to these policies whenever they occur.
- Provide or arrange for the provision of accessible formats and communication support for any employee with a disability who requests them, in relation to both job-specific information and general workplace information. This is managed through P-AODA-006 Accessible Formats for Employees Procedure.
- Provide individualized workplace emergency response information to any employee who has a disability that may affect their ability to respond to a workplace emergency, as soon as practicable after becoming aware of the need. This information is developed in consultation with the employee and is described in P-AODA-007 Individualized Emergency Response Information and SOP.
- Develop and implement a written documented process for creating Individual Accommodation Plans for employees with disabilities, as required under Ontario Regulation 191/11 section 28. This process is set out in P-AODA-008 Individual Accommodation Plan Procedure and Template.
- Develop and implement a written documented return-to-work process for employees who have been absent from work due to a disability and who require disability-related accommodation to return. This process is set out in P-AODA-009 Return to Work Process and Plan.
- Take into account the accessibility needs of employees with disabilities when conducting performance management reviews, providing career development and advancement opportunities, and making redeployment decisions. We will ensure that the performance evaluation process itself is accessible and that accommodation needs are considered in all such decisions.

Standard 4 - Transportation Standard

The Transportation Standard does not apply to Pride Pak Canada Ltd. as the company is not a transportation service provider. No action is required under this standard.

Standard 5 - Design of Public Spaces Standard

Where Pride Pak Canada Ltd. constructs new or redevelops existing outdoor public spaces at its facility, it will comply with the Design of Public Spaces Standard under Ontario Regulation 413/12. Pride Pak Canada Ltd. also commits to proactively identifying and addressing existing physical accessibility barriers at its facility through an ongoing Physical Accessibility Barrier Identification and Checklist process as set out in AODA-CHK-001. No structural or major construction changes are required under this standard for the existing facility at this time. Minor physical accessibility improvements identified through the barrier checklist will be addressed on a priority basis as set out in the Multi-Year Accessibility Plan P-AODA-004.

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Training

Pride Pak Canada Ltd. will ensure that all employees, volunteers, contractors and any person who participates in developing the company's policies receives training on the AODA, the Integrated Accessibility Standards Regulation (IASR) and the Ontario Human Rights Code as it pertains to persons with disabilities. Training will be provided as soon as practicable after a person is assigned applicable duties and will be provided again whenever there are changes to this policy or the IASR. Training records will be maintained documenting the names of persons trained, the dates of training and the number of persons trained in each period. All training records are available for inspection by the Ontario Accessibility Directorate on request.

Multi-Year Accessibility Plan

Pride Pak Canada Ltd. has developed a Multi-Year Accessibility Plan covering the period 2026 to 2031 in accordance with Ontario Regulation 191/11 section 4. The plan sets out the company's strategy to prevent and remove accessibility barriers and to meet its requirements under the AODA. The Multi-Year Accessibility Plan is documented in P-AODA-004, is published on the Pride Pak Canada Ltd. website and is available in accessible formats upon request at no cost. The plan is reviewed and updated at least once every five years.

Employee Responsibilities

- All employees must treat colleagues, customers, suppliers and visitors with disabilities with dignity, respect and in a manner that promotes independence and equal opportunity at all times.
- All employees who interact with the public, customers or suppliers must be trained on the AODA Customer Service Standard and must know how to communicate and interact with persons who use different assistive devices or who are accompanied by a service animal or support person.
- Supervisors and managers are responsible for identifying and reporting physical or systemic accessibility barriers in their areas to the Management Representative immediately.
- The Management Representative is responsible for implementing this policy, maintaining all AODA-related records, coordinating training delivery, maintaining training records and ensuring that accommodation processes are followed consistently and confidentially.
- The Management Representative (MR) is responsible for reviewing this policy annually, overseeing the Multi-Year Accessibility Plan, reporting on AODA compliance at the Management Review Meeting and ensuring that the AODA compliance report is filed with the Ontario government on time.
- Senior management is responsible for approving and funding all accessibility improvements and accommodation measures and for ensuring that AODA compliance is a standing item on the Management Review Meeting agenda.

Informal Resolution

Any employee, customer, supplier or visitor who has a concern about an accessibility barrier or believes that Pride Pak Canada Ltd. has failed to meet its obligations under this policy is encouraged to raise the matter informally with the Management Representative in the first instance. Many accessibility concerns can be resolved promptly and informally through open dialogue and a willingness to find a reasonable solution. Where informal resolution is not possible or appropriate, the formal process below applies.

Formal Disciplinary Procedure

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Investigation

Any formal complaint that Pride Pak Canada Ltd. has failed to meet its obligations under this policy or under the AODA will be investigated by the Management Representative. The investigation will be conducted promptly, impartially, confidentially and as soon as practicable. Where a complaint is made by an employee it will be treated as a formal grievance and investigated in accordance with the Grievance Handling Policy P-SMT-0004. Where a complaint is made by a customer, supplier or visitor it will be investigated by the Management Representative, with Pride Pak Canada Ltd. aiming to communicate the outcome in writing within ten working days as an internal service target, recognising that more complex matters may reasonably take longer.

Disciplinary Actions

- Any employee found to have deliberately discriminated against, excluded or treated a person with a disability in a manner that is demeaning, undignified or contrary to this policy will face disciplinary action up to and including dismissal.
- Any supervisor or manager who fails to act on a reported accessibility barrier or who obstructs or discourages an accommodation request will face disciplinary action.
- Any employee who breaches the confidentiality of a disability-related accommodation or medical information will face disciplinary action up to and including dismissal.

Gross Misconduct

- Deliberately and repeatedly denying a person with a disability access to goods, services, facilities or employment opportunities to which they are entitled under this policy and the AODA.
- Disclosing personal medical or disability information about an employee without their written consent and without a legitimate legal justification.
- Retaliating against or penalising any employee who has requested an accommodation, filed an AODA complaint or participated in an AODA investigation.
- Deliberately falsifying AODA training records or AODA compliance declarations filed with the Ontario government.

Documentation

All formal actions, decisions and accommodation arrangements made under this policy will be documented and retained in the relevant employee file or company records. Records will include the nature of the request or matter, findings, actions taken, timelines and the employee's response. All records will be retained for a minimum of three years from the date of the action or the end of the employment relationship, whichever is later. All records are maintained in a confidential manner and are accessible only to those with a legitimate need to know.

Appeals Process

Employees have the right to appeal any formal decision made under this policy. Appeals must be submitted in writing to the Management Representative as soon as practicable, and Pride Pak Canada Ltd. asks that this be done within five working days of receiving the formal decision wherever possible. Appeals will be reviewed by a senior manager not previously involved in the matter. Pride Pak Canada Ltd. aims to communicate the outcome of the appeal to the employee in writing within ten working days of receipt of the appeal as an internal service target, and the outcome shall be final. The right to appeal does not affect any right the employee may have to file a complaint with the Ontario Human Rights Tribunal or any other regulatory body.

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Confidentiality

All matters raised under this policy will be handled with strict confidentiality. Information about any request, complaint or accommodation will only be shared with those directly involved in the process or who have a legitimate need to know. Personal medical information about an employee's disability will never be shared without the employee's explicit written consent, except where required by law.

Compliance with Ontario Laws and International Standards

This policy aligns with and is subject to:

- Accessibility for Ontarians with Disabilities Act, 2005 (AODA)
- Ontario Regulation 191/11 - Integrated Accessibility Standards Regulation (IASR)
- Ontario Regulation 429/07 - Accessibility Standards for Customer Service
- Ontario Regulation 413/12 - Integrated Accessibility Standards (Design of Public Spaces)
- Ontario Human Rights Code
- Ontario Employment Standards Act (ESA) 2000
- Canadian Human Rights Act
- UN Convention on the Rights of Persons with Disabilities (UNCPRD)
- McDonald's Supplier Code of Conduct v4.0 (2024)
- SMETA 7 ETI Base Code - Pillar 1 (Labour) and Pillar 2 (Health and Safety)

Communication

This policy will be communicated to all employees as soon as practicable after they begin employment and will be made accessible within the workplace at all times, in a language and format the employee understands. A copy will be provided in accessible formats upon request at no cost. This policy will be reviewed at least annually by senior management and updated as required to reflect changes in legislation, international standards or company practice. The policy is publicly available on the Pride Pak Canada Ltd. website and at the reception area of the facility.

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