



Accessible Customer Service Policy, Practice and Procedure

This policy is prepared in accordance with SILGAN's responsibilities under the Accessibility for Ontarians with Disabilities Act, 2005, and applies to the provision of our services and goods not to the services or goods themselves.

Application

- i. This policy applies to the provision of goods and services at premises operated by Silgan in Ontario.
- ii. This policy applies to employees, agents and contractors who deal with the public or other third parties that act on behalf of the company.

Statement of Policy

Silgan Plastics Canada Inc. is committed to compliance with the AODA and to providing accessible customer service to all members of the public, including those persons with disabilities.

The provision of Silgan's services and goods will be made with due regard to the principles of dignity, independence, integration and equal opportunity by:

- a) using alternative methods, when practicable, to ensure that all customers including customers with disabilities have access to our services and goods, in the same place and in a similar manner;
- b) considering individual needs when providing goods and services; and
- c) effectively communicating in a manner that takes into account a customer's disability.

Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Silgan.

Persons who act on behalf of Silgan will be trained and familiarized on appropriate interaction with customers who may use assistive devices.

Guide Dogs and Service Animals

A person with a disability who is accompanied by guide dog or service animal will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

Persons who act on behalf of Silgan will be trained and familiarized on appropriate interaction with customers who may be accompanied by a guide dog or service animal.

Support Persons

Silgan will ensure that support persons accompanying customers will be welcomed.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to the disclosure of confidential information to the support person.

Persons who act on behalf of Silgan will be trained and familiarized on appropriate interaction with customers who may be accompanied by a support person.

Notice of Disruptions in Service

Access to Silgan's premises or other service disruptions may occur due to reasons that may or may not be within the control or knowledge of the company. In the event of any temporary disruptions to facilities or services used by customers with disabilities to access or use Silgan's services or goods, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

When disruptions occur Silgan will provide notice by:

- a) posting notices in appropriate places, at the main entrance and nearest accessible entrance to the service disruption and/or on the Silgan's website;
- b) contacting customers with appointments;
- c) verbally notifying customers when they are making a reservation or appointment; or
- d) by any other method that may be reasonable under the circumstances.

Feedback Process

Silgan will provide customers with the opportunity to provide feedback on services provided to customers with disabilities.

Information about the feedback process will be available to all customers and notice of the process will be made available by maintaining a feedback link on the company's website and by specialized feedback forms available at Silgan's Canadian Head Office. Feedback can also be directed to:

Silgan Plastics Canada Inc.
400 Rowntree Dairy Rd.
Woodbridge ON L4L 8H2

herman.radeschi@silganplastics.com

Training

Training will be provided to all persons covered by this policy, practice and procedure. As required by the AODA, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- A review of the requirements of the *Accessibility Standards for Customer Service*.
- Instructions on how to interact and communicate with people with various types of disabilities.
 - Instructions on how to interact with people with disabilities who use assistive devices, require the assistance of a guide dog or other service animal or require the use of a support person.
- Instructions on what to do if a person with a disability is having difficulty accessing our services.
- Silgan's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Silgan will provide training as soon as practicable. Training will be provided to new employees, volunteers, agents and/or contractor who deal with the public or act on our behalf. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Silgan will keep records of training in compliance with the requirements of the AODA.

Notice of Availability and Format of Documents

Silgan will notify customers that the documents related to the *Accessibility Standard for Customer Service* are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Silgan and/or any other reasonable method.



Mike DiBiasio
Director of Operations
NEP, SCA, LAC, WDB



Date

Accessibility for Ontarians with Disabilities Act: Multi Year Accessibility Plan

Statement of commitment

Silgan Plastics is committed to meeting the needs of its employees and stakeholders with disabilities and to treating all persons in a way that allows them to maintain their dignity and independence. We believe in equal opportunity and integration. 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 at a minimum, meeting applicable statutory accessibility requirements.

Multi year Plan:

This multi year plan sets out Silgan Plastics' achievements to date and our future strategies to meet accessibility requirements and ensure we are delivering on our commitment to remove barriers and improve opportunities for persons with disabilities. This is a five year plan covering 2024 – 2029. This plan will be monitored and reviewed on an annual basis to assess progress and adapt priorities as necessary to meet statutory requirements.

Policies

Silgan Plastics has implemented an accessibility policy which is posted on the Silgan Plastics website and is reviewed on a regular basis. This policy includes the following components:

Customer Service

Silgan Plastics is committed to providing accessible customer service to persons with disabilities. This means we provide goods and services to persons with disabilities with the same high quality and timeliness as others.

Assistive devices: all persons will continue to be welcome to bring and use their own assistive devices on all Silgan Plastics premises that are publicly accessible.

Information and Communication: Silgan Plastics is committed to making our information and communication accessible to persons with disabilities. Upon request, Silgan Plastics will provide or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability.

Service animals: Silgan Plastics welcomes persons with disabilities and their service animals. Subject to other applicable legislation or public health requirements, service animals are permitted on all Silgan Plastics premises that are publicly accessible.

Support persons: A person with a disability who is accompanied by a support person will be welcome to have that person accompany them into all publicly accessible Silgan Plastics premises.

Notice of temporary disruption: In the event of a planned or unexpected disruption to Silgan Plastics services or facilities which may impact persons with disabilities, Silgan Plastics will make every effort to inform such persons as soon as is possible.

Training employees and volunteers: Silgan Plastics will ensure training is provided on the requirement of applicable accessibility and human rights legislation to all new employees and volunteers as part of their orientation. The training will be appropriate for their role and responsibilities.

Accessible websites and web content: Silgan Plastics will ensure our internet website, including web content and web based applications, conform to WAG 2.0 level AA, except where this is impracticable.

Employment:

Recruitment, assessment, and selection: As part of our recruitment process, all postings will stipulate that accommodations are available upon request for applicants with disabilities. Upon request, Silgan Plastics will provide or arrange for suitable accommodations that take into account the applicant's accessibility needs due to a disability up to the point of undue hardship. When making an offer, Silgan Plastics will notify successful applicants of our policies for accommodating employees with disabilities in the workplace.

Informing employees of support available: Silgan Plastics will inform our employees of our policies to support employees with disabilities.

Workplace emergency response information: Silgan Plastics will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that individual information is necessary and Silgan Plastics is aware of the need for accommodation due to a disability. Any individual plan will be reviewed if the employee moves to a different work location and when the overall accommodation plan is reviewed.

Documented individual accommodation plans: Silgan Plastics will maintain a written process for the development of documented individual accommodation plans for employees with disabilities where such a plan is needed.

Return to work process: Silgan Plastics will maintain a documented return-to-work process for our employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

Performance management, career development and advancement and reassignment: Silgan Plastics will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees or when reassigning employees.

Design of public spaces:

Silgan Plastics currently does not maintain public spaces but if that changes, Silgan Plastics will meet accessibility standards for public spaces under Silgan Plastics' control and when modifying public spaces under Silgan Plastics control.

Feedback

Silgan Plastics welcomes feedback on accessibility matters in our workplace and in the provision of our services. Any such feedback should be directed to (416)746-8300.