

HUMAN RIGHTS POLICY

Introduction

Li-Cycle Holdings Corp. (together with its controlled subsidiaries, “**Li-Cycle**” or the “**Company**”) is an industry leader in lithium-ion battery resource recovery and the leading lithium-ion battery recycler in North America. This policy sets out our commitment to respect human rights throughout our global business and in our relationships with all stakeholders including the communities where we work.

Scope

This policy covers all directors, officers, and employees of the Company. We expect our business partners and suppliers, which includes our vendors, contractors, consultants, agents, and other third parties that provide the Company with goods and services, to adhere to this policy as a condition to working with us.

Guiding principles

Our approach to respect human rights is guided by the following:

- United Nations Guiding Principles on Business and Human Rights
- United Nations Global Compact
- United Nations Universal Declaration on Human Rights
- United Nations Sustainable Development Goals
- OECD Guidelines for Multinational Enterprises
- International Labor Organization’s (ILO) Declaration on Fundamental Principles and Rights at Work
- Voluntary Principles on Security and Human Rights
- Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Bill S-211)
- Our Code of Business Conduct and Ethics and other applicable corporate policies, procedures, and principles

Our commitments

Li-Cycle respects the dignity and human rights of our internal and external stakeholders, and is committed to the following:

- *Respect for Human Rights.* We aim to avoid causing or contributing to adverse human rights impacts and seek to prevent or mitigate adverse human rights impacts linked to our operations through our business relationships.

- *Workplace Health and Safety.* We prioritize the health and safety of our employees and strive for zero-harm across the Company by providing a safe workplace in compliance with applicable health and safety laws, regulations, and internal requirements. Health and safety is our top priority in our materiality assessment of sustainability topics.
- *Environment.* We strive for continuous improvement in our environmental impact, and prioritize air emissions, climate change, waste management and environmental stewardship in our materiality assessment of sustainability topics.
- *Community and Stakeholder Engagement.* We recognize the importance of communicating with our stakeholders openly, honestly, and in good faith through constructive dialogue. We prioritize community and stakeholder engagement in our materiality assessment of sustainability topics.
- *Indigenous Peoples.* We respect the collective and customary rights of Indigenous Peoples who may be directly affected by our sites of operation and present in the area of influence. We will work to obtain their free, prior, and informed consent before proceeding with any new development at the site of operation and throughout the life of the project.
- *Forced Labour, Human Trafficking and Child Labour.* We do not tolerate the use of forced labour, modern slavery, or child labour in our operations.
- *Workplace Culture.* We foster an equal opportunity workplace. We promote equity and inclusion and strive to represent historically under-represented groups, including women. We will not discriminate against any individual based on any criteria or characteristic prohibited by applicable law including race, sex, colour, national or social origin, religion, age, disability, sexual orientation, political opinion, or any other status unrelated to the individual's job performance. We prioritize employee wellness, compliance with labour standards and diversity and inclusion in our materiality assessment of sustainability topics.
- *Freedom of Association and Collective Bargaining.* We respect workers' internationally recognized human rights including safe working conditions, freedom of association, freedom of speech, collective bargaining, maximum working hours, fair wages and benefits, peaceful assembly, equal opportunity, and freedom from discrimination, guided by the ILO Declaration on Fundamental Principles and Rights at Work.
- *Awareness and Training.* We take actions to embed a human rights culture throughout our global business and in our relationships with our business partners and suppliers. These measures include awareness-raising and training on this policy, and instructions on how to report human rights concerns through the Company's formal and confidential grievance mechanisms.

- *Security Arrangements.* We are guided by the Voluntary Principles on Security and Human Rights for any security-related human rights risks.

Grievance Reporting Procedures

We are committed to fostering a positive and open working environment where stakeholders can report human rights concerns. We will continue to maintain the Company's formal and confidential grievance mechanisms for this purpose. As outlined in our *Whistleblower Protection and Investigation Policy*, the Company has established a confidential reporting helpline which is accessible via an independent third-party service called Ethical Advocate. We do not permit retaliation or intimidation against anyone who reports a concern, raises a compliance question, seeks advice, or cooperates in an investigation.

Enforcement

The Company will take appropriate measures to implement this policy. For directors, officers, and employees, non-compliance with this policy may be grounds for disciplinary action including termination of employment. For business partners and suppliers, non-compliance may be grounds for contract termination.

Responsibility

Compliance with this Policy is overseen by our General Counsel and our Vice-President, Health, Safety, Environment & Quality. The Policy is administered by the Legal and HSEQ teams and other designated representatives. The HSES Committee of the Board of Directors is responsible for reviewing and updating this policy and recommending approval by the Board.

Approved by the Board of Directors on February 28, 2024.