



**Li-Cycle Holdings Corp.**

**ACCESSIBILITY for ONTARIANS with DISABILITIES ACT, 2005**

## **MULTI-YEAR ACCESSIBILITY PLAN**

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In this document, **Li-Cycle**, **we**, **us** and **our** mean Li-Cycle Holdings Corp., and its subsidiaries in Ontario, and, where indicated, third party service providers providing services on behalf of Li-Cycle in Ontario.

The following multi-year accessibility plan sets out Li-Cycle's strategy to achieve accessibility, remove barriers for individuals with disabilities and meet Li-Cycle's obligations in accordance with the Integrated Accessibility Standards Regulations ("IASR") which have been established pursuant to the *Accessibility for Ontarians with Disabilities Act, 2005* (the "AODA").

### **1. Accessible Workplace Emergency Response Information**

Where we are aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

#### **Action Taken/Planned Action:**

For employees who have self-identified as having a disability, we will implement the following measures, as applicable:

- individualized workplace emergency response information procedures for employees with disabilities, as disclosed and required;
- workplace emergency response information forms for employees who have disclosed a disability and who are being accommodated according to their disabilities;
- where required, provide assistance to employees with disabilities, with the employees' prior consent, to help them evacuate the workplace in case of an emergency or disaster as set out in individualized emergency plans for the employees;
- individualized emergency plans communicated to the employees' respective managers and safety personnel on an 'as needed' basis; and
- on an ongoing and regular basis, and as per the applicable terms of the IASR review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed.

Completion Date: December 2023

Status: Ongoing based on employee self-reporting.



## 2. Training

We are committed to providing training to all employees and agents which incorporates the requirements of accessibility standards referred to in the IASR and the Ontario *Human Rights Code*, as it pertains to people with disabilities. We keep a record of the training we provided, which includes the dates on which the training was provided and the number of individuals to whom it was provided.

### **Action Taken/Planned Action:**

In accordance with the IASR, we will:

- determine and ensure that appropriate training on the requirements of the IASR and on the Ontario *Human Rights Code* as it pertains to people with disabilities, is provided to all employees, independent contractor representatives, volunteers (if applicable), third-party service providers who provide services related to products, services and facilities on our behalf, and people participating in the development and approval of our policies;
- ensure that the training is provided to people referenced above as soon as practicable after commencing their employment or work relationship with us;
- keep and maintain a record of the training provided, including dates the training was provided and number of individuals to whom it was provided; and
- ensure training is provided on any changes to our policies on an ongoing basis.

Completion Date: By April 30, 2024

Status: Ongoing

## 3. Information and Communication

We are committed to making company information and communications accessible to people with disabilities. We will incorporate new accessibility requirements under the information and communication standards to ensure that its information and communications systems and platforms are accessible and are provided, upon request, in accessible formats that meet the needs of people with disabilities.

### **a. Feedback, Accessible Formats and Communication Supports**

### **Action Taken/Planned Action:**

In accordance with the IASR, we will:

- ensure that existing and new processes for receiving and responding to feedback are accessible to people with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner;
- more broadly, as a general principle where accessible formats and communication supports for people with disabilities are requested:



- provide or arrange for the provision of such accessible formats and communication supports;
- consult with the person making the request to determine the suitability of the accessible format or communication support; and
- provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons; and
- notify the public about the availability of accessible formats and communication supports.

Completion Date: By April 30, 2024.

Status: Ongoing

## **b. Accessible Websites and Web Content**

### **Action Taken/Planned Action:**

In accordance with the IASR, we recognize our obligation to provide web content which conforms with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA.

Any website hosted by Li-Cycle Holdings Corp. shall meet the requirements set out in the IASR. Our IT Department will ensure ongoing compliance with this requirement.

- WCAG 2.0 Level AA – all Internet websites and web content, except for the following exclusions set out in the IASR: (1) Live captions and (2) Pre-recorded audio descriptions.
- WCAG Compliance Date: Based on online self-assessment tools, Li-cycle is approximately 62% compliant with WCAG 2.0 Level AA standards and anticipates being 100% compliant by December 31, 2024.

## **4. Employment**

### **a. Recruitment**

We are committed to fair and accessible employment recruiting practices that attract and retain employees with disabilities. This includes providing accessibility at all stages of the employment cycle.

In accordance with the IASR, we will do the following:

### **Action Taken/Planned Action:**

#### **(i) Recruitment General**

We will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:



- review and, as necessary, modification of existing recruitment policies, procedures and processes; and
- specifying that accommodation is available for applicants with disabilities, on our website and on job postings.

### **(ii) Recruitment, assessment and selection**

We will notify job applicants, when they are individually selected to participate in an assessment or selection process and inform them that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. This will include:

- review and, as necessary, modification of existing recruitment policies, procedures and processes;
- inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment; and
- consultation with applicants who request accommodation and arrangement for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs.

### **(iii) Notice to Successful Applicants**

When making offers of employment, we will notify the successful applicant of our policies for accommodating employees with disabilities. This will include:

- a review and, as necessary, modification of existing recruitment policies, procedures and processes; and
- inclusion of notification of our policies on accommodating employees with disabilities in offer of employment letters.

Completion Date: By June 30, 2024.

Status: Ongoing

## **b. Informing Employees of Supports and General Provision of Accessible Formats and Communications Supports**

In accordance with the IASR, we will inform all employees of policies that support employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take employees' accessibility needs into account. This will include:

- informing current employees and new hires of our policies;
- providing information as soon as practicable after the new employee begins employment, preferably in the orientation process;
- keeping employees up to date on changes to existing policies on job accommodations with respect



to disabilities;

- where an employee with a disability so requests it, we will provide or arrange for provision of suitable accessible formats and communications supports for:
  - information that is needed in order to perform the employee's job; and
  - information that is generally available to employees in the workplace; and
- in meeting the obligations to provide the information that is set out above, we will consult with the requesting employee in determining the suitability of accessible formats or communications supports.

Completion Date: By April 30, 2024.

Status: Ongoing

### **c. Documented Individual Accommodation Plans/Return to Work Process**

We will incorporate new accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.

#### **Action Taken/Planned Action:**

We will review and assess existing policies to ensure that they include a process for the development of documented individual accommodation plans for employees with disabilities, if such plans are required. In accordance with the provisions of the IASR, we will ensure that the process for the development of documented individual accommodation plans include the following elements:

- information regarding the manner in which the employee requesting accommodation can participate in the development of the plan;
- information regarding the means by which the employee is assessed on an individual basis;
- information regarding the manner in which we can request an evaluation by an outside medical or other expert, at our expense, to assist us in determining if and how accommodation can be achieved;
- steps to protect the privacy of the employee's personal information;
- information regarding the frequency with which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- the reasons for a denial where an individual accommodation plan is denied;
- information regarding the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs; and
- the following will be included if individual accommodation plans are established:
  - any individualized workplace emergency response information that is required;



- any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
  - information that is needed in order to perform the employee's job;
  - information that is generally available to employees in the workplace; and
  - identify any other accommodation that is to be provided to the employee.

We will ensure that the return to work process as set out in its existing policies outlines:

- the steps we will take to facilitate the employee's return to work after a disability-related absence;
- the development of a written individualized return to work plan for such employees; and
- the use of individual accommodation plans, as discussed above, in the return to work process.

#### **d. Performance Management, Career Development and Redeployment**

We will 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;
- when providing career development and advancement to employees with disabilities; and
- when redeploying employees with disabilities.

#### **Action Taken/Planned Action:**

In accordance with the IASR, we will:

- review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR;
- take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
  - assessing performance;
  - managing career development and advancement; and
  - redeployment is required;
- review, assess and, as necessary, include in performance management workshops, accessibility criteria;
- take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal job postings; and
- take into account the accessibility needs of employees with disabilities when redeploying



employees, including review and, as necessary, modification of employee transfer checklist.

Completion Date: April 30, 2024.

Status: Ongoing

## **5. Design of Public Places Standards**

We are committed to incorporating accessibility features/considering accessibility for people with disabilities in the design of our public spaces.

### **Action Taken/Planned Action:**

In accordance with the IASR, we will do the following:

- where appropriate, we will provide clients with notice if there is a temporary disruption when accessible elements are not in working order.

Completion Date: April 30, 2024.

Status: Ongoing.