



# Modern Slavery Report

May 2025

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Introduction

Li-Cycle Holdings Corp., together with its subsidiaries, is dedicated to fighting against forced labour and child labour within its operations and supply chains.

This document constitutes Li-Cycle Holding Corp’s report (the “Report”) pursuant to section 11 of Canada’s Fighting Against Forced Labour and Child Labour in Supply Chains Act (“Act”) for the financial year ended December 31, 2024, on the steps taken to uphold human rights and prevent exploitation throughout our business activities, in Canada and elsewhere.

This is a joint report made on behalf of Li-Cycle Holdings Corp. (OTCQX: LICYF) and certain of its subsidiaries (the “Li-Cycle Reporting Entities”) identified in the table below (collectively, “Li-Cycle”, “Company”, “we”, “us” or “our”).

<i>Li-Cycle Reporting Entities</i>	<i>Principal Activities</i>
Li-Cycle Holdings Corp.	Ultimate parent of the Li-Cycle group of companies. Quoted on the OTCQX® Best Market.
Li-Cycle Corp.	Owner of IP and employer in Canada.

Section 1 – Steps to Prevent and Reduce Risks of Forced Labour and Child Labour

During the financial year ended December 31, 2024, Li-Cycle took steps to prevent and reduce the risk of forced labour and child labour in its supply chains.

In 2023, we instituted a new counterparty questionnaire titled *Know Your Vendor* (“KYV”), with a view to screening potential counterparties that use, or are associated with the parties that use, or have been prosecuted for the use of, child or forced labour. The specific requirement is found in section 10 of the KYV form, whereby the counterparty is asked to represent and warrant that neither the counterparty, nor any of its affiliates, beneficial owners, or directors use (or have been prosecuted in any jurisdiction for offense relating to the use of) child, prison, indentured, or forced labour. Completion of a KYV form is mandatory for all new vendors and suppliers across all regions and operations of Li-Cycle prior to commencing any services or delivering products to Li-Cycle, as part of their engagement process with Li-Cycle.

From the employment perspective, Li-Cycle conducts pre-employment screening through a third-party software when hiring new employees that seeks confirmation of ability to work in-country, and includes education and designation verifications, employment verification, and other job-related verifications. All roles, including internships, co-op and summer positions are paid positions and in compliance with local employment legislation.

## Section 2 – Business Structure, Activities, Supply Chains

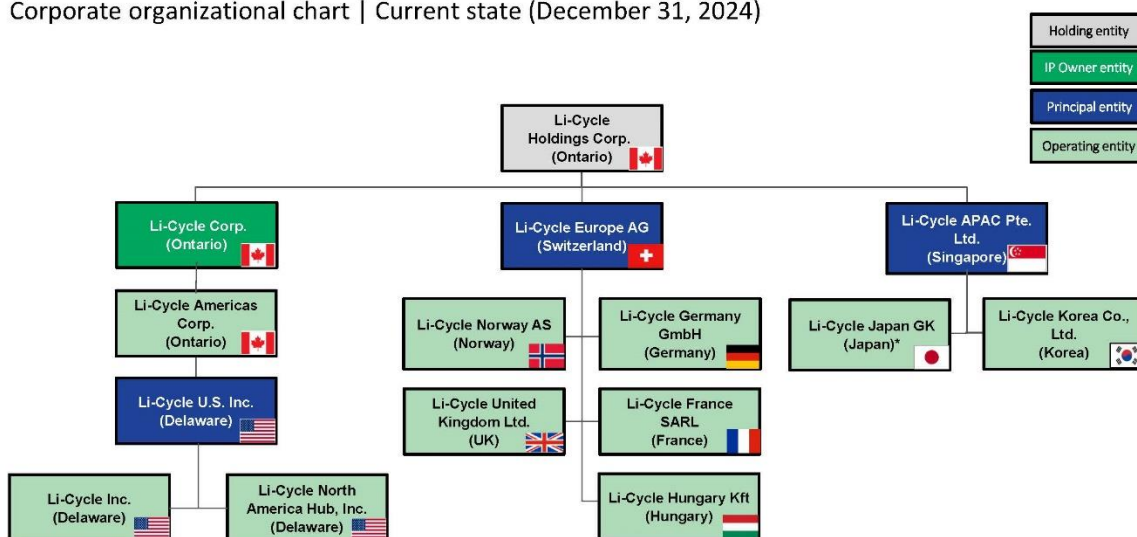
### Our Business Structure

Li-Cycle Holdings Corp. is a corporation existing under the Ontario *Business Corporations Act* and is the ultimate parent company of the Li-Cycle group of companies.

Li-Cycle's head office is located at [66 Wellington Street West, Suite 5300, Toronto, Ontario, M5K 1E6], Canada. Li-Cycle Holdings Corp.'s common shares are quoted on the OTCQX® Best Market.

The following diagram depicts the organisational structure of Li-Cycle as of December 31, 2024.

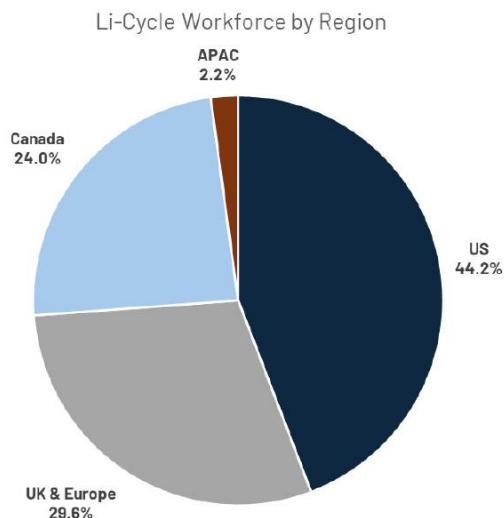
Corporate organizational chart | Current state (December 31, 2024)



All subsidiaries of Li-Cycle Holdings Corp., a publicly held company, are 100% owned.

\*Liquidated, effective December 31, 2024

As of December 31, 2024, we had a combined workforce of approximately 240 employees (full-time and full-time equivalents). We operate in the United States, Canada, Europe, and Asia. The graph below, illustrates the geographical distribution of our workforce.



### *Our Activities*

As at December 31, 2024, Li-Cycle had three operational Generation 3 Spokes in North America and Europe, which were located in Gilbert, Arizona (the “Arizona Spoke”), Tuscaloosa, Alabama (the “Alabama Spoke”), and Magdeburg, Germany (the “Germany Spoke”). In view of the pause in construction of the Rochester Hub project, the Company has slowed operations at its North American Spokes by commencing closure activities at the Ontario Spoke, curtailing operations at the New York Spoke and slowing down operations at its Arizona and Alabama Spokes.

The Company processes end-of-life batteries and certain manufacturing scrap at its Spokes to produce black mass and shredded metal. Other manufacturing scrap acquired by the Company may be processed at the Company’s ancillary lines to produce intermediate products or sold directly to third parties.

Materials acquired and processed through these Spokes are sourced in accordance with the following process:

- Potential customers approach Li-Cycle, usually to bid for feedstock material according to a request for quotation process; alternatively, Li-Cycle provides existing customers with a table of rates for different feedstock types.
- Depending on whether Li-Cycle has conducted business with the potential customer, a KYV process is followed to confirm the details of the customer.
- Details received from the customer are then screened via Thompson Reuters, against over 400 separate Denied Party Screening (DPS) and DPS sanctions/embargo lists internationally.
- Li-Cycle’s standard terms and conditions include representations and warranties, including a representation and warranty regarding child or forced labour, as noted above.

In 2024, we recycled 9,113 tonnes of battery material consisting of full packs, manufacturing scrap and other battery types, produced 5,385 tonnes of black mass and equivalents (“BM&E”) and sold 5,919 tonnes of BM&E. Through our recycling services, we helped 13 prominent EV manufacturers and 15 key battery cell and material producers fulfill their commitments to responsibly dispose of their battery waste.

We seek to maximize the commercial value of our purchased battery manufacturing scrap by re-selling some of these materials, whether directly or after processing through our ancillary lines at its Spokes, directly to third parties, primarily in the Asia-Pacific region. With respect to transportation, we utilized third-party freight forwarders for procuring trucking services. In the U.S.A., Canada, and Germany, freight forwarders source trucking services from the local market. To move Li-Cycle materials, these service providers must be registered with the U.S. Department of Transport or Transport Canada in North America, and must comply with the Code of Federal Regulations requirements in the U.S.A., the Transport of Dangerous Goods requirements in Canada, and applicable transport regulations in Germany. These requirements provide added assurance to Li-Cycle that only reputable companies meeting minimum Canadian, U.S., German, and international standards can be used for the transport of our feedstock materials.

#### *Our Supply Chains*

None of our direct third-party suppliers were identified as being high risk based on a review of information provided as part of our KYV process, the DPS, and publicly available information. We understand that certain manufacturing regions and materials carry a higher risk of child and forced labour by virtue of the prevalence of child and forced labour in certain jurisdictions. Our governance policies and due diligence, the required compliance with government standards by the service providers we utilize, and our internal processes for reporting violations of human rights and laws, including employment laws, help us mitigate the potential risks in our supply chains.

### Section 3 – Li-Cycle’s Due Diligence Processes and Policies

Our KYV process and our third-party vetting platform allow us to conduct targeted due diligence on our vendors and suppliers prior to doing business with them.

With the backing of Executive Leadership, Li-Cycle’s *Human Rights Policy* was approved by the Board in Q1 2024 and has since been distributed across the organisation. The policy can be found on our website here <https://investors.li-cycle.com/governance/governance-documents/default.aspx>. The implementation of Li-Cycle’s *Human Rights Policy* reflects a commitment to responsible corporate citizenship and the protection of human rights across all aspects of the Company’s operations and supply chains.

Our *Code of Business Conduct and Ethics* (the “Code of Conduct”) applies to all directors, officers, and employees of the Company and highlights everyone’s responsibility to respect and promote the highest level of ethical conduct, professionalism, and fairness. The Code of Conduct explicitly prohibits any illegal or unethical act, or instructing others to commit such act, for any reason.

Under our *Whistleblower Protection and Investigation Policy*, we have devised a system whereby any employee may submit a good faith complaint to the Company, without fear of dismissal or retaliation, of any actual or potential or suspected violation of the Code of Conduct; any violation of applicable laws, rules, or regulations; any employment related matters; or any other matters of ethical concern. All questions and concerns are taken seriously and addressed promptly, and professionally, in accordance with the policy.

## Section 4 – Forced Labour and Child Labour Risks in Activities and Supply Chains

Li-Cycle provides end-of-life recycling to enable the recovery of key metals including copper, nickel, cobalt and lithium from lithium-ion batteries and battery manufacturing scrap. These metals originate from the initial production of the lithium-ion batteries by large-scale battery manufacturers, variously located in the U.S.A., Canada, Europe, and Asia. Metals used in the original manufacture of batteries by others is sourced globally.

Cobalt is one metal type where it has been documented that child and forced labour has been used in mining the material in locations such as the Democratic Republic of Congo<sup>1</sup>. While Li-Cycle cannot exclude the potential presence of cobalt from one of these sources within its end-of-life battery feedstock, we aim to reduce this risk through the application of our previously-described internal governance and screening mechanisms, combined with the sourcing of this feedstock from materials produced by top-tier global battery manufacturing companies that have established their own supply chain and Human Rights' commitments. Li-Cycle further notes that its recycling of these materials contributes to the reduction of relative demand for primary material sourcing of cobalt in the future, through the provision of a sustainable secondary recycled option.

## Section 5 – Remediation Measures, including Income Loss

Based on our assessment of our activities and supply chains, as described above, in 2024, Li-Cycle did not identify the use of child or forced labour in our operations or supply chain. As a result, in 2024, there were no measures taken to remediate the loss of income to the most vulnerable families given that there was no child or forced labour identified in our operations or supply chains.

In the event that modern slavery incidents are ever identified in our business or in our supply chains, our response will be respectful, practical, and proportionate, and will include consideration of Human Rights impacts on those affected, such as those related to loss of employment or income.

## Section 6 – Training

Though Li-Cycle does not currently have any training programs in place that directly address the risk of forced labour or child labour in its supply chain, it has implemented the related training programs described below.

All workers, regardless of level and including executives are required to complete onboarding which includes a 2-hour in-person presentation covering the company vision, mission and values, introduction to our Integrated Management System (aligned to ISO 14001, 45001 and 9001), payroll and benefits review, personal protective equipment requirements, key systems review and general IT set-up. The session also reviews the required training modules that are to be completed within a set timeframe. Employees are provided with a Certificate of Completion, as applicable, and course

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<sup>1</sup> <https://www.wilsoncenter.org/blog-post/drc-mining-industry-child-labor-and-formalization-small-scale-mining>

completions are tracked and reported weekly to ensure compliance. We also provide refresher training on a periodic basis to address new or changing legal and compliance risks.

## Section 7 – Assessment of Effectiveness

As our internal processes, systems, and supply chains evolve, we will continue to take steps to monitor the effectiveness of our actions to prevent child and forced labour in our operations and supply chains.

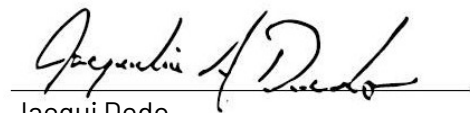
Our corporate teams are engaged with Li-Cycle’s operating segments to provide support and advice on managing the risk of child and forced labour in our supply chains.

## Section 8 – Report Attestation and Sign-Off

This Report was approved by the Board of Directors of Li-Cycle Holdings Corp. on behalf of itself and each of the Li-Cycle Reporting Entities pursuant to section 11(4)(b)(ii) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the Report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the Report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I have the authority to bind Li-Cycle Holdings Corp.  
and the Li-Cycle Reporting Entities

A handwritten signature in black ink, appearing to read "Jacquie Dedo", is written over a horizontal line.

Jacqui Dedo  
*Independent Chair of  
Li-Cycle's Board of Directors*

May 9, 2025