



PURECYCLE TECHNOLOGIES, INC.

Whistleblower Protection And Non-Retaliation Policy

(ADOPTED EFFECTIVE AS OF MARCH 17, 2021)

Purpose

This Whistleblower Protection and Non-Retaliation Policy (the “**Policy**”) is intended to reinforce the commitment of PureCycle Technologies, Inc. and its subsidiaries and affiliates (collectively, the “**Company**”) to integrity and ethical behavior by helping to foster and maintain an environment where employees and others affiliated with the Company (e.g., contractors, temporary workers, agents) can report concerns about wrongdoing or suspected wrongdoing without fear of retaliation. The purpose of this Policy is to encourage employees and others affiliated with the Company to disclose wrongdoing or suspected wrongdoing that may adversely impact the Company and its employees or other stakeholders, and to set forth the procedures by which such reports should be made, investigated, and addressed. All employees are responsible for reporting wrongdoings or suspected wrongdoings according to the procedures in this Policy.

Reports of Wrongdoing

Employees who become aware of any wrongdoing or suspected wrongdoing (the “**Reporting Individual**”) are required to report such matters as described below. An act of wrongdoing or suspected wrongdoing may relate to (a) financial matters, such as auditing, accounting, or internal control issues, or (b) non-financial matters, such as a violation of the Company’s codes, rules, regulations, and/or policies, or applicable laws and governmental regulations.

Any act of wrongdoing or suspected wrongdoing should be reported in the following manner:

1. Employees are strongly encouraged to discuss any concerns first with their immediate supervisors. Those immediate supervisors are then required to notify their supervisors if they receive a report of wrongdoing or suspected wrongdoing. In certain circumstances, it might not be reasonable for employees to discuss the matter with their supervisors, such as if someone in the employee’s supervisory chain is involved in the wrongdoing or suspected wrongdoing.
2. Alternatively, employees may contact the Company’s Vice President–Human Resources, General Counsel, the Chair (the “**Audit Chair**”) of the Audit Committee of the Company’s Board of Directors (the “**Audit Committee**”), the Chair of the Nominating and Corporate Governance Committee (the “**Governance Committee Chair**”) regarding reports concerning non-financial matters, as applicable, or the

Ethics and Compliance Hotline (the “**Hotline**”) at (888) 826-5655 or by email to www.redflagreporting.com/purecycletech.

The Company has established procedures by which employees may make a confidential and anonymous report. Confidential anonymous submissions should be mailed directly to the General Counsel at PureCycle Technologies, Inc., 5950 Hazeltine National Drive, Suite 650, Orlando, Florida 32822 or may be submitted via the Hotline at (888) 826-5655, or by email to www.redflagreporting.com/purecycletech. An employee who makes an anonymous report should preserve his or her own record of the report in order to demonstrate compliance with this Policy and with the Company’s Code of Business Conduct and Ethics.

Investigations

An inquiry or investigation will be undertaken at the direction of the Audit Chair to which a call has been reported for each instance of financial wrongdoing, or the Governance Committee Chair for each instance of non-financial wrongdoing. A confidential file for each report or complaint will be maintained in accordance with the Company’s records retention policy. Results of all investigations will be reviewed on a quarterly basis by the Audit Chair or the Governance Committee Chair pursuant to which a non-financial investigation was initiated. The applicable Committee Chair will report such matters to the Company’s Board of Directors at least annually.

Upon receipt of any report pertaining to the Company’s accounting standards, internal accounting controls or audit matters or notice of any such concern, the Audit Chair will report the matter to and consult with the Company’s Chief Financial Officer, or such other officer of the Company as the Audit Committee may designate, either generally or with respect to a particular matter (in each case, the “**Responsible Officer**”), to ensure that he or she is fully apprised of the matter and will notify the General Counsel of receipt of such complaint or notice. Under the oversight of the Audit Committee, the Responsible Officer will conduct a thorough investigation of the matter, summarize his or her findings and conclusions in a written report to the Audit Committee and the General Counsel and promptly take, or cause to be taken, any action that may be required to resolve properly the matter which is the basis for the complaint or concern.

If the complaint or concern relates to a weakness or deficiency in any of the Company’s internal controls or accounting systems, the Responsible Officer will oversee any necessary strengthening and/or correction of such weakness or deficiency. If the complaint or concern relates to a misstatement, error or omission in any of the Company’s financial statements, or in any report or other document filed by the Company with the Securities and Exchange Commission (the “**SEC**”) or other federal or state governmental or regulatory authority, the Responsible Officer in conjunction with the General Counsel, if appropriate, will oversee the prompt correction or restatement of such financial statement, report or document and, if necessary, will cause to be filed with the SEC, or other federal or state governmental or regulatory authority, any and all amendments to any previously filed reports or documents which may be necessary to correct any such misstatement, error or omission. Any other matters reported will be addressed and resolved appropriately in accordance with law and the applicable accounting or auditing standards. The

Responsible Officer will keep the Audit Chair and the General Counsel informed of his or her findings and progress throughout this process.

Upon completion of the investigation and any necessary corrective action, the Responsible Officer will prepare and submit to the Audit Committee a final report on the matter. The report will describe in reasonable detail the complaint or concern reported, the results of the ensuing investigation, the conclusions reached and any corrective action taken. If no corrective action was taken, the report will include an appropriate explanation to support the decision to take no action. The Responsible Officer will respond in writing to the Reporting Individual, advising such individual of the results of the investigation and of any corrective action taken or, if no such action was taken, the reasons why no action was taken. A copy of the final report, including all related materials, and response to the Reporting Individual will be delivered to the General Counsel and the Company's Board of Directors.

Legal Counsel and Other Experts

In discharging their responsibilities hereunder, the Audit Committee, the Responsible Officer and other Board committees, as applicable, and may utilize internal resources (*e.g.*, members of the Company's human resources or legal departments) and/or may retain an independent accountant, independent legal counsel or other experts to assist in the investigation of the complaint or reported concern, the evaluation of the matter under investigation or determining and implementing the appropriate remedial or corrective action. The cost of retaining any such expert or experts shall be borne by the Company.

No Retaliation Regarding Reports of Wrongdoing

The Company shall not take adverse employment action against an employee in retaliation for:

1. Any good faith reports of wrongdoing or suspected wrongdoing related to financial or non-financial matters;
2. Any good faith reports concerning the violation of any Company policy, applicable law, rule or regulation, including those governing safety, health, discrimination and harassment;
3. Providing information or causing information to be provided, directly or indirectly, in an investigation conducted by the Company or any federal, state or local regulatory agency or authority; or
4. Participating in an investigation, hearing, court proceeding or other administrative inquiry in connection with a report of wrongdoing or suspected wrongdoing.

This Policy is intended to encourage the reporting of wrongdoing or suspected wrongdoing by the Company's employees and others affiliated with the Company and presumes that employees and others affiliated with the Company will act in good faith and will not make false accusations. An employee or other person affiliated with the Company who knowingly or recklessly makes statements or disclosures that are not in good faith will be subject to discipline, which may include termination of employment/engagement.

Any claims of adverse employment action in retaliation for the reporting of wrongdoing or suspected wrongdoing under this Policy should be submitted to the General Counsel for investigation. Any employee who retaliates against another employee or other person affiliated with the Company who has reported a claim of wrongdoing in good faith is subject to discipline, up to and including termination of employment.