

SUSTAINABILITY POLICY

2024



NOUVEAU MONDE GRAPHITE

GENERAL PRINCIPLES

At **Nouveau Monde Graphite Inc.** (“**NMG**” or the “**Company**”), we recognize the crucial role of graphite in the global transition toward a decarbonized society. Graphite is a limited resource and presents a unique opportunity and a significant responsibility: to ensure its extraction and processing are done sustainably to meet current and future needs.

We strive to become a model of excellence in mining and advanced materials production, enhancing the sustainability of our sector and the industries we serve.

We are committed to adopting a comprehensive and responsible approach in managing our business, operations, and relationships. We fully acknowledge our short- and long-term impact on people, the environment, technology, and the economy.

We are committed to complying with—and exceeding whenever possible—the sustainability standards and requirements set forth by applicable legal, industrial, and ESG norms. Additionally, we officially adhere to the following initiatives:

- » The United Nations’ 2030 Agenda for Sustainable Development;
- » The United Nations Framework Convention on Climate Change’s Paris Agreement;
- » The Global Battery Alliance of the World Economic Forum;
- » The Towards Sustainable Mining program of the Mining Association of Canada;
- » The recommendations of the Task Force on Climate-Related Financial Disclosure (“TCFD”).

With this in mind, we focus our efforts on delivering the greatest positive contributions while minimizing negative impacts to create a sustainable and resilient world for people and the planet. This policy is complemented by our Climate Action Plan.

OUR APPROACH

By integrating sustainability principles into the daily management of our activities, the design of products and the engineering of our facilities and operations, we aim to achieve three fundamental aspirations.

CREATING SHARED VALUE

- » We prioritize the well-being of our employees, contractors, and communities by providing a safe and secure working environment.
- » We commit to deepening our understanding of Indigenous perspectives, traditions, and knowledge, while developing meaningful relationships and mutually beneficial collaboration mechanisms.
- » We ensure that our activities and projects act as catalysts for positive socio-economic impacts for communities and Indigenous Peoples.
- » We actively promote diversity, inclusion, and equity within the Company and in all aspects of our operations and value chain.
- » We aim for sustainable financial performance, ensuring the Company’s long-term success and vitality.
- » We protect and enhance, whenever possible, our natural environment while supporting its preservation.
- » We promote a tailored and transparent approach to stakeholder engagement, respectful of First Nations’ rights and context on their ancestral land, and drawing stakeholders from all horizons into proactive consultation and continued communication, at every stage of our projects development.

POWERING A CLEANER FUTURE

- » We reduce, reuse, and recycle resources, waste, and emissions while increasing our operational efficiency.
- » We commit to using renewable energy to power our activities and operations.
- » We adopt a life cycle approach for our products and company, aiming for maximum sustainability and achieving carbon neutrality throughout the Company's existence.
- » We advance research and development to offer the most environmentally friendly products to the market.
- » We regularly reassess our operations and the waste generated to explore valorization pathways and circular industrial models through internal developments and/or external partnerships.
- » We proactively assess the environmental and social interdependencies of our activities and projects and implement strategies to mitigate any negative impacts.
- » We encourage innovative practices that support our sustainability vision and promote initiatives that contribute to a greener future.

ACCELERATING THE WHEEL OF CHANGE

- » We set relevant goals and targets for our sector and report transparently according to recognized frameworks.
- » We train and actively engage our employees, suppliers and partners to promote sustainability at all levels of the Company.
- » We integrate sustainability considerations into all our business decisions and maintain a constructive dialogue with our business, community and Indigenous partners, both upstream and downstream of our activities and our operations, to ensure alignment and continuity of efforts.
- » We prioritize the procurement of sustainable goods and services, favoring local and Indigenous suppliers, fair working conditions, and strong environmental commitment.
- » We participate in community, industry, and international initiatives that bring together various stakeholders to drive innovation, share knowledge, and contribute as leaders in our field.
- » We invest in capacity building for employees, communities, Indigenous Peoples and stakeholders to enable their full participation in our activities and beyond our operations.

ACTION, MONITORING AND EVALUATION

We are committed to continually improving our performance by adapting our practices and validating them against recognized standards and certifications. The Company advances a cross-functional sustainability roadmap which namely includes our Climate Action Plan, to actively drive results and continuous improvement.

Performance and progress are monitored against indicators defined by international reporting frameworks (Global Reporting Initiative, SASB Standards, TCFD) and our Company targets.

Management regularly reports to the Board of Directors' ESG Committee and via transparent public disclosure in the Company's annual ESG Report, CDP climate change survey and corporate communications.

SCOPE, REVISION AND ACCOUNTABILITY

This Policy covers all our activities and projects, and provides our employees, contractors, clients, community members, Indigenous Peoples, partners, shareholders, and other stakeholders with a reference framework for our sustainability management.

This Policy is communicated to all NMG personnel who must confirm their adherence. All employees and officers, across business entities of NMG, are responsible for implementing this Policy and updating the documentation related to environmental, social and governance activities. This documentation is used for monitoring, audits, or evaluations as needed.

The Policy is internally reviewed on an annual basis to ensure its continued relevance and effectiveness. The Vice President, Communications & ESG Strategy, who is responsible for reviewing and updating the Policy according to the stages of the Company's development, as well as for its implementation and monitoring, leads this process. The Policy is submitted to the Board of Directors every second year, or earlier if significant changes are required due to legislative or organizational developments, to ensure the final approval, guaranteeing that the Policy remains aligned with the Company's strategic objectives and regulatory requirements.

The Chief Executive Officer is responsible for the success of this Policy, supported by the Vice President, Communications & ESG Strategy.

HISTORY OF REVISIONS

VERSIONS	PREPARED BY	REVISED BY	APPROVED BY	DATE
V1	N/A	Eric Desaulniers	Board of Directors	2017/04
V2	Julie Paquet	Eric Desaulniers	Board of Directors	2021/03
V3	Ismael Chevalier	Julie Paquet	Board of Directors	2024/09