

# OCCUPATIONAL HEALTH AND SAFETY POLICY

2024



**NOUVEAU MONDE** GRAPHITE

## GENERAL PRINCIPLES

At **Nouveau Monde Graphite Inc.** (“**NMG**” or the “**Company**”), the occupational health and safety (“**OHS**”) of all individuals, including employees, contractors, suppliers, and visitors, are fundamental values and constitute a shared responsibility.

## OUR APPROACH

In line with our caring philosophy, we promote the following principles:

- » **Prevention:** All workplace incidents and occupational illnesses can and must be prevented.
- » **Priority:** Health and safety at work are absolute priorities, integrated into all our activities, management practices, and decision-making processes. No other activity is important or urgent enough to justify compromising health or safety at work.
- » **Leadership:** Setting the example at every level of the Company and creating an environment that promotes open communication and invites feedback set a robust foundation for an OHS-focuses culture and empowers employees to act.
- » **Ownership:** While management is ultimately responsible for OHS, the adoption of safe working practices is a shared responsibility among management, employees, contractors, suppliers, and visitors. Employees and contractors are responsible for their own safety as well as the safety of their colleagues.
- » **Enabling:** Awareness, information, continuous training, adequate resources, and sustained communication are essential to achieving our goals and striving for excellence in OHS.

When the health and safety of any individual are at risk, our leaders have the authority to suspend activities. Employees have the right to refuse to perform work they deem unsafe and to intervene to prevent others from carrying out any work that could compromise their safety or the safety of others. There will be no discrimination or retaliation following the exercise of rights provided in applicable laws, regulations, or this policy.

## OUR COMMITMENTS

- » We commit to providing a safe and healthy work environment by taking all necessary measures to prevent work-related injuries and illnesses.
- » We provide all employees with the necessary procedures, equipment, training, and support to carry out their tasks safely while setting concrete and measurable objectives, established in collaboration with employees.
- » We identify, evaluate, and eliminate dangers as well as control risks at their source, and investigate all incidents to determine root causes and prevent recurrence.
- » We implement health surveillance programs adapted to the nature of our operations to monitor employees exposed to specific occupational hazards.
- » We develop and implement maintenance programs for equipment and machinery.
- » We comply with applicable laws and regulations and adhere to globally recognized standards to continuously improve our OHS management systems.
- » We consult and actively involve employees in assessing risks, setting priorities, addressing concerns, and continuously improving our OHS practices, via safety committees and bidirectional communication channels.

- » We measure our performance based on ambitious objectives and recognized high standards of excellence and communicate our results to employees, the Board of Directors and our stakeholders.
- » We regularly conduct independent OHS audits to ensure that our practices comply with this policy, as well as with current laws and regulations.
- » We establish coherent, effective, and adapted emergency plans for the type of facilities, the conditions of our operations, and legal requirements.
- » We require that our contractors and suppliers adhere to this Policy and our Supplier Code of Conduct, comply with our prevention program when working at our sites, and report transparently on their OHS performance.

## 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 OHS 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 OHS 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 Chief Operating Officer, 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 Chief Operating Officer.

## HISTORY OF REVISIONS

VERSIONS	PREPARED BY	REVISED BY	APPROVED BY	DATE
V1	N/A	N/A	Eric Desaulniers	2020/11
V2	Philippe Legault Sylvain Descombes	Eric Desaulniers	Board of Directors	2021/03
V3	Ismael Chevalier Josée Lafrenière	Bernard Perron Julie Paquet	Board of Directors	2024/09