

GRIEVANCE POLICY

2024



NOUVEAU MONDE GRAPHITE

GENERAL PRINCIPLES

At **Nouveau Monde Graphite Inc.** (“NMG” or the “Company”), we believe that effective management of grievances is essential for maintaining positive relationships with communities, First Nations, and stakeholders. This policy aims to structure and clarify the process for addressing grievance in a fair and transparent manner.

This policy does not replace external bodies responsible for enforcing environmental standards and other obligations, nor does it replace NMG’s Human Rights Policy, Workplace Harassment Prevention Policy or Whistleblowing Policy, which allows employees, subcontractors, officers, or directors to report in good faith any actual or potential violations of NMG’s Code of Conduct through appropriate channels, including an anonymous ethics hotline (+1 833 664-1736) and a website (<http://nmg.ethicspoint.com/>).

OBJECTIVES

We recognize that our activities and operations can generate both positive and negative impacts. Through this policy, NMG is committed to providing a structured and equitable mechanism for handling grievances to prevent and mitigate negative impacts and, where applicable, to implement corrective measures or enhance the positive impacts of our activities and operations. We also ensure that any inappropriate, discriminatory, or unethical behavior is investigated and managed according to other existing policies within the Company.

DEFINITIONS

Claim: Any claim regarding damages caused by NMG’s activities or operations.

Complaint: Verbal or written expression of dissatisfaction or discontent communicated by a stakeholder regarding NMG’s activities or operations. Complaints can be formal or informal and relate to a perceived inconvenience or impact from NMG’s activities or operations.

Concern: Verbal or written expression of worry communicated by a stakeholder about NMG’s activities or operations. Concerns may escalate to complaints if not addressed promptly.

Grievance: Refers to the expression of a comment, question, request for information, concern, complaint, or claim by a stakeholder, in writing or verbally, related to NMG’s activities or operations (including subcontractor activities).

Grievance Manager: NMG employee assigned to manage grievances for the relevant site.

Positive Feedback: Verbal or written expression of an observation or opinion that is positive regarding NMG’s activities and operations from a stakeholder.

Question: Any question, request for information, suggestion, or recommendation related to NMG’s activities or operations.

Requester: Any stakeholder, whether an individual, group of individuals, a household or organizational representative, who has reported a grievance. Identification of the requester is carried out by the Grievance Manager assigned to the relevant project.

Stakeholder: An individual or collective entity (group or organization) that is actively or passively affected by an activity, project, or business, meaning their interests may be positively or negatively impacted as a result of its execution (or lack thereof).

OUR COMMITMENTS

THOROUGHNESS

All grievances to the Company will be analyzed rigorously according to the prescribed processing steps.

TIMELINESS

All grievances to the Company will be handled by an NMG employee. Follow-up with the requester will occur within the following timeframes:

- » Comment, question, and suggestion: 3 business days
- » Complaint and concern: 24 hours during business days
- » Urgent: Communication upon receipt of the grievance and resolution as swiftly as possible.

TRANSPARENCY

All grievances will be recorded in a register. This non-nominative register will be shared with NMG's management team, the Ministry of the Environment and Climate Change, Wildlife and Parks (MELCCFP), and the Matawinie Mining Project Monitoring Committee, and made public via NMG's website.

IMPROVEMENT

While each grievance is handled independently and actions are tailored to each situation, the grievance register will be reviewed annually to identify opportunities for improvement in activities and operations, aiming for continuous improvement and stakeholder collaboration.

OUR APPROACH

RESOLUTION PROCESS

NMG has developed an eight-step procedure to assess and process a grievance, assigned responsibilities for each operating site and trained key employees on the resolution process:

- » Step 1 Receipt of the grievance
- » Step 2 Acknowledgment and urgency assessment
- » Step 3 Analysis and investigation
- » Step 4 Follow-up with the requester
- » Step 5 Development of resolution options
- » Step 6 Follow-up with the requester
- » Step 7 Closure of the grievance and accountability
- » Step 8 Evaluation and improvement

Following a series of iterations, if the requester is dissatisfied with the corrective measures implemented and wishes to maintain their grievance report, NMG will propose an action plan including a timeline and involving members of the Company's management team, which must be confirmed by both parties (NMG and the requester). A third party may be involved by NMG if needed.

DISSEMINATION MECHANISM

NMG is committed to making the Grievance Policy and the means to report known to interested communities, First Nations, stakeholders, and the public using culturally appropriate channels, physical and digital signage, and more broadly on its website.

All grievances made through official channels, regardless of urgency, are recorded in a grievance register to ensure follow-up and for the purpose of evaluation and continuous improvement. A simplified and anonymized register is made public via NMG’s website.

REPORTING METHODS

Phone	+1 450 757-8905; an automated messaging system will systematically forward information to the designated Grievance Manager at each site. Or directly to a Community Relations contact at NMG.
Email	grievance@nmg.com or directly to the Community Relations contact.
NMG Website	https://nmg.com/sustainability/team-and-communities/
In Person	Head office in Saint-Michel-des-Saints: 481, rue Brassard, Saint-Michel-des-Saints, (Québec) J0K 3B0. Open from 9 a.m. to 4 p.m., Monday to Friday.

Only grievances made through these official channels will be subject to the follow-up outlined by NMG in this policy. All grievances will be handled in a manner that preserves the anonymity of the requesters.

If the requester needs assistance in reporting a grievance, they can contact the Community Relations contact at +1 450-757-8905 ext. 220 or the Indigenous Relations contact at +1 450-757-8905 ext. 280 for support. If needed, translation services into the requester’s Indigenous language will be provided.

SCOPE, REVISION AND ACCOUNTABILITY

This Policy covers all our activities and projects, including Phase-1 facilities, the Matawinie Mine and future hydroelectric powerline to the Provost substation, the Bécancour Battery Materials Plant, and the Uatnan Mining Project, across all phases of development (exploration, demonstration, construction, operation, closure, and post-closure). It also includes the activities and operations of subcontractors at NMG sites. This Policy provides our employees, contractors, clients, community members, Indigenous Peoples, partners, shareholders, and other stakeholders with a reference framework for grievance 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 grievance reporting, management and resolution. 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	Isabelle Levasseur With a contribution from the Matawinie Monitoring Committee	Martine Paradis	Eric Desaulniers	2021/02
V2	Kelly LeBlanc Ismael Chevalier	Julie Paquet	Board of Directors	2024/09