



# **COMPLAINT MANAGEMENT POLICY**

**2021**

This policy was adopted in February 2021 by Nouveau Monde Graphite’s Accompanying Committee for the Matawinie mining project.

## INTRODUCTION

The purpose of this Complaint Management Policy is to clarify and provide a framework for the process and methods to handle comments and complaints made to Nouveau Monde Graphite (“Nouveau Monde” or the “Company”). This policy is not a substitute for external bodies that enforce environmental standards and regulations and other obligations. Its goal is to facilitate discussions with stakeholders and other parties with an interest in Nouveau Monde’s activities and operations.

The Company wants to uphold good relations with its host communities and stakeholders. It recognizes that its activities and operations may have both negative and positive impacts and wants to have concrete mechanisms in place for stakeholders to provide feedback. The Company also wants to ensure that any discriminatory, racist or inappropriate behaviour is addressed by the various policies that it has put in place.

Nouveau Monde’s intent with this policy is to create a fair and transparent process for dealing with comments or complaints in order to avoid, mitigate or ameliorate the impacts that may be generated by its activities and the actions of its employees, consultants and contractors and to take the appropriate action as necessary.

## DEFINITIONS

### **Comment**

A stakeholder’s verbal or written expression of concern or of a positive or negative opinion regarding Nouveau Monde’s business or operations. The different comment categories can be found in Table 1.

### **Complaint**

A stakeholder’s verbal or written expression of dissatisfaction or displeasure with the activities and operations of Nouveau Monde that may require corrective action or follow-up, which may or may not be immediate. The different complaint categories can be found in Table 2.

### **Stakeholder**

An actor, individual or collective (group or organization) that has an active or passive concern in an activity, project or company, i.e. their interests may be positively or negatively affected by the execution (or non-execution) of its activities.

### **Report**

Refers to a comment or complaint made by a complainant.

### **Designated Officer**

The Nouveau Monde employee assigned to manage comments and complaints.

### **Complainant**

A stakeholder who makes a complaint to Nouveau Monde.

## COMMITMENT TO COMPLAINT MANAGEMENT

### Thoroughness

Any complaint or comment reported to the Company will be thoroughly analyzed according to the complaint and comment review process.

### Timeliness

Any complaint or comment reported to the Company will be promptly investigated by an on-site Nouveau Monde employee to determine whether the report is justified and whether corrective action is required. The target response time is 4 hours from the time of reporting. In addition to the possibility of corrective action, a report form must be filled out within 72 hours of the receipt of the comment or complaint.

### Transparency

Follow-up will be done with the complainant both during and after the review process. A non-identifying report log will be sent to the MELCC and the Accompanying Committee and posted publicly on Nouveau Monde's website.

### Improvement

Although each report will be treated independently and any corrective action taken will be tailored to each situation, the report log will be periodically reviewed to identify ways to improve operations.

## INFORMATION MECHANISMS

ACTIONS TO BE TAKEN		STATUS
1.	Identify the ways that stakeholders can make a comment or complaint (Community Relations Office, phone, email and Nouveau Monde website).	✓
2.	Post a sign at the entrance to the site with information on how to make a comment or complaint.	✓
3.	Set up an automated messaging system that forwards comments and complaints to the Designated Officer.	✓
4.	Appoint a Designated Officer who will receive comments and complaints.	✓
5.	Create a standardized form for tracking reported comments and complaints.	✓
6.	Clarify the expectations of the Designated Officer (actions to be taken, response times) and train this person.	✓
7.	To foster their cooperation, provide employees and subcontractors who work at the site with the policy as well as awareness tools about the potential harmful impacts of activities as well as the complaint handling process.	Ongoing
8.	Schedule periodic follow-up of the report log at meetings of Operations Managers and the Accompanying Committee.	Ongoing

**TABLE 1: COMMENT CATEGORIES AND RESPONSES**

COMMENT CATEGORY	RESPONSE
Positive feedback	Comment received and reviewed by the Designated Officer and forwarded to the head of the department concerned.
Comment that does not concern the activities of Nouveau Monde Graphite	The Designated Officer reviews the comment and forwards it to the proper authority, if necessary.
Question or information request	Received and reviewed by the Designated Officer, who forwards it to the head of the department concerned. Response by the Designated Officer.
Suggestions and recommendations regarding operational practices	Received and reviewed by the Designated Officer, who forwards it to the head of the department concerned. Response by the Designated Officer.

**TABLE 2: COMPLAINT TYPES AND RESPONSES**

COMPLAINT TYPES	RESPONSE
Reporting of a concern about the inconvenience/impact of the Company's activities that is not expressed as a formal complaint but as a concern.	Concern received and reviewed as per the established procedure.
Submission of a formal complaint about an inconvenience/impact related to the Company's activities.	The complaint handling mechanism is triggered as per the implemented procedure. Information about the complaint is entered in the report log.

Any comment, concern or complaint received, regardless of its degree of importance or urgency, as well as any action taken in response must be entered in the report log for follow-up as well as for evaluation and continuous improvement purposes.

## COMPLAINT PROCEDURE

### FOLLOW-UP WITH THE COMPLAINANT INTERNAL COMPLAINT HANDLING PROCESS

