

# HUMAN RIGHTS POLICY

2022



**NOUVEAU MONDE** GRAPHITE

## HUMAN RIGHTS POLICY

Nouveau Monde Graphite Inc. (“NMG” or the “Company”) is committed to supporting the protection of human rights through best practices in all of our business activities. We are dedicated to ensuring that our dealings and activities are carried out in compliance with the human rights standards established within the Universal Declaration of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, and we adhere to the principles set out in the United Nations Guiding Principles on Business and Human Rights, and in the Women’s Empowerment Principles.

Accordingly, at NMG:

- We recognize that our operations have direct and indirect impacts on our environment, as well as on our employees, contractors, local community members and other stakeholders, and work to identify, monitor, avoid and mitigate potential human rights risks.
- We are committed to providing a safe and healthful workplace to our employees and contractors while ensuring a respectful and harmonious presence within our communities and on the lands on which we operate. Everyone at NMG is dedicated to the objective of managing hazards and preventing risks that cause workplace incidents.
- We diligently seek not to infringe, directly or through complicity in acts of others, on the human rights of our employees, contractors, local community members and other stakeholders who may be impacted by our business activities. We expect our suppliers and business partners to share this commitment and to put in place policies and processes that support respect for human rights.
- We do not discriminate against any individual on the basis of race, national or ethnic origin, colour, religion, age, gender, sexual orientation, matrimonial status, civil status, or physical or mental handicap or any other arbitrary characteristic unrelated to the individual’s work performance.
- We promote diversity, inclusion and equity in the workforce, as manifested in our policies, standards and practices. We recognize the dignity and worth of every person and are committed to building a workplace and culture that emphasizes integrity, transparency and accountability.
- We ensure and promote gender equality through all levels of the Company, including in leadership and management positions. We are committed to building an organizational culture that is free of any gender-based discrimination and where women feel empowered.
- We respect the rights of our employees to freedom of association and the right to collective bargaining, and do not interfere in an employee’s decision whether to join an association. Our employees have the right to engage in activities protected under the Québec’s Labor Code and Quebec’s Charter of Human Rights and Freedoms as well as Canada’s Charter of Rights and Freedoms. This includes the right to form or join unions; engage in protected, concerted activities to address or improve working conditions; or refrain from engaging in these activities.
- We respect the rights of local and Indigenous communities near our sites of operation and ensure that all relevant stakeholders are engaged, and measures taken to respect their rights. We do not tolerate disrespectful or inappropriate behaviour, harassment, intimidation or unfair treatment, or retaliation of any kind by our employees or those of our suppliers and business partners.
- We are committed to a strong and diverse supplier network which supports our goal of making a positive contribution in the communities where we do business. We expect our suppliers to respect our voluntary commitments, Supplier Code of Conduct and policies.
- We support the elimination of all forms of child, forcibly indentured and compulsory labour.

- We strive for continuous improvement in upholding and respecting human rights through ongoing dialogue with internal and external stakeholders.
- We are committed to investigating and addressing concerns for which we are made aware and taking corrective action in response to any violation in a neutral manner. Potential violation of the Company's Code of Conduct, policies, applicable laws or regulations, can be reported via the confidential ethics hotline services at any time by phone at the following number: (833) 664-1736, or via the EthicsPoint Web Intake Site at the following address: <http://nmg.ethicspoint.com>. We will take measures to ensure the grievance mechanism's accessibility, effectiveness and continuous improvement.

**Approved by the Board of Directors on March 22, 2022.**