

SUPPLIER CODE OF CONDUCT

2022



NOUVEAU MONDE GRAPHITE

GENERAL PRINCIPALS

Nouveau Monde Graphite Inc. (the "**Company**" or "**NMG**") is committed to conducting business in an ethical, legal and socially responsible manner. We aim to create an environment where we can build strong, sustainable and long-term relationships with our suppliers, contractors, employees and customers. NMG values the relationships with its suppliers and contractors (the "**Suppliers**") as they are critical to NMG's success and allow us to meet our business objectives. In many ways, our Suppliers constitute an extension of our business in their interactions with our communities and stakeholders and can represent an important lever in the environmental and socioeconomic development of our value chain.

With this in mind, we created this Supplier Code of Conduct (the "**Code**") to set expectations and ensure we continue to work collaboratively with all our Suppliers based on shared standards.

COMPLIANCE WITH LAWS

In all their dealings with the Company, Suppliers must operate their businesses in compliance with all applicable laws, codes, rules and regulations of the jurisdiction in which they operate, as well as applicable international conventions, including, without limitation, the International Labour Organization (ILO) Conventions (the "**ILO Conventions**"), in effect from time to time (collectively, the "**Laws**").

FAIR BUSINESS DEALINGS

Antitrust and Fair Competition

Suppliers must engage in fair competitive business practices in compliance with applicable antitrust and competition Laws. In particular, but without limitation, Suppliers must not engage in any collusive bidding, price fixing or other unfair trade practices.

Anti-Corruption

Suppliers must comply with all applicable Laws enacted to combat corruption and bribery, including, (i) the Canadian *Corruption of Foreign Public Officials Act*, (ii) the U.S. *Foreign Corrupt Practices Act*. Where there are variations in the applicable Laws, Suppliers must comply with the strictest requirement. Suppliers must not, without limitation, promise, facilitate or authorize the giving of anything in return for a preferential treatment, or to obtain an improper advantage or, in the case of a public official, as consideration for an act or omission in connection with their official duties or to influence official action. Suppliers must inform NMG if any of their directors, officers, shareholders or senior managers are "government officials" for purposes of anti-corruption Laws.

Conflict of Interest

Suppliers shall take necessary measures to avoid conflicts of interest, whether actual or potential, including even the appearance of any conflicts of interest in respect of their relationship with NMG. Suppliers must notify the Company immediately if they become aware of any such conflicts of interest.

LABOR AND HUMAN RIGHTS

Suppliers must uphold the highest standards of human rights and treat their workers and contractors with dignity and respect.

Child Labor and Forced Labor

In accordance with NMG’s values and applicable Laws, and more specifically the ILO Conventions, the use of child labor is strictly prohibited. Suppliers must not, under any circumstances, use or in other way benefit from forced or compulsory labor, nor be involved, directly or indirectly, in any form of human trafficking or slavery. Likewise, the use of labor under any form of indentured servitude is prohibited, as is the use of physical punishment, confinement, threats of violence or other forms of harassment or abuse as a method of discipline or control.

Non- Discrimination and Diversity

Suppliers must not discriminate in recruitment, hiring, promotion, compensation, employee development decisions, such as training, and all other practices of employment on the basis of race, national or ethnic origin, religion, gender, sexual orientation, marital status, age, political beliefs, pregnancy or parental status, disability or other basis prohibited by law, and must aim to promote diversity within their workplace.

Coercion and Harassment

Suppliers are subject to NMG’s harassment prevention policy and must commit to treat each of their employees, contractors and agents with dignity and respect. Suppliers must not use corporal punishment, threats of violence or other forms of physical, sexual, psychological or verbal harassment or abuse in dealing with any one of them.

Working Hours

Suppliers must comply with applicable Laws with respect to working hours, overtime, and days of rest. Suppliers should provide enough rest and leisure and take measures to prevent employees from working excessive hours.

Wages and Benefits

Suppliers will pay their employees at least the minimum wage for work performed, respecting all applicable wage Laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

Freedom of Association and Collective Bargaining

Suppliers must respect the rights of employees to associate, organize and bargain collectively in accordance with applicable Laws.

HEALTH & SAFETY

Suppliers must comply with all applicable health & safety Laws and provide a high standard of care as it relates to the health, security, and well-being of their employees, suppliers, customers, communities and others who might be affected by their actions. To align with NMG’s zero-harm philosophy, Suppliers are expected to monitor and prevent any health and safety risks, and to report on any incidents in order to track their performance. In addition, Suppliers must comply with NMG’s health & safety policies during the course of any visit to, or operations, on NMG site.

ENVIRONMENT

Suppliers must commit to managing their operations in compliance, at a minimum, with applicable environmental Laws, and actively identify, manage and mitigate any environmental risks due to their activities. In addition, Suppliers must comply with NMG’s environmental policy and monitoring programs when they are operating on NMG site. Consideration for the environment shall govern Suppliers’ actions

when planning or overseeing their operations and in any other activities that may have an impact on the environment.

LOCAL COMMUNITY AND INDIGENOUS RELATIONS

NMG is committed to develop a respectful and mutually beneficial relation with its local communities, including Indigenous communities. NMG expects from its Suppliers that they operate with the utmost respect for the rights, culture and interests of their surrounding communities. While operating on NMG site, any negligent behaviour that could infringe on Indigenous peoples' rights and/or jeopardize harmonious relationships with Indigenous peoples will not be tolerated.

INSIDER TRADING

Suppliers must comply with all insider trading Laws and not trade in the securities of NMG during any period when they have become aware of confidential or material information of NMG until the confidential or material information has been fully disclosed and a reasonable period of time has passed for such information to be widely disseminated.

CONFIDENTIALITY

Suppliers must maintain all proprietary information of NMG in the strictest confidence. Suppliers must not use, for their own benefit or the benefit of anyone else, nor disclose to anyone, any proprietary information of NMG without NMG's express prior written consent.

DEMONSTRATION OF COMPLIANCE

Suppliers must be able to demonstrate compliance with this Code at the request and to the satisfaction of NMG and provide reasonable assistance to NMG during the course of any investigation into the Suppliers compliance with this Code.

This Code forms part of all agreements between NMG and its Suppliers. Suppliers are required to comply with this Code and to ensure that its employees and representatives understand and comply with this Code. In case of observed non-compliance with this Code, Suppliers will take all reasonable measures to meet the standards exposed in this Code in a diligent manner. Failure to adhere to this Code may be grounds for termination of the Supplier relationship and any related agreements.

Suppliers have a duty to report in good faith any unethical conduct or improper activities that may be in violation with this Code. NMG has implemented an anonymous ethics hotline that can be used 24/7 by phone at (833) 664-1736 or via a web intake site at <http://nmg.ethicspoint.com/>.