

# Whistleblower Policy

Nouveau Monde Graphite Inc.

September 2021



**NOUVEAU MONDE** GRAPHITE



## WHISTLEBLOWER POLICY

### OBJECTIVE AND SCOPE

As an employee, subcontractor, officer or director of Nouveau Monde Graphite Inc. (“NMG” or the “Company”) you have a duty to report in good faith any real or potential violation of the Code of Conduct (the “Code”) of the Company and to seek advice if you have questions or a concern regarding the Code.

The Company is committed to maintaining high standards of business conduct and integrity at all times. Accordingly, NMG offers many avenues for raising concerns you may have regarding actual or suspected unethical conduct or improper activities.

### EXAMPLES OF REPORTABLE UNETHICAL CONDUCT

- accounting, auditing, or other financial reporting fraud or misrepresentation
- violations of laws that could result in fines or damages, or that could adversely impact NMG’s reputation
- unethical business conduct or inappropriate behaviour in violation of the Code or any other NMG policy (e.g. the Anti-Bribery and Anti-Corruption Policy)
- danger to the health, safety, or well-being of employees and/or the public

### PROCEDURE

The first step is to raise your concern with your direct supervisor. He or she knows your work environment and is usually in the best position to help you deal with the issue raised. Most issues are resolved this way. Other resources include the next level of management, or the Human Resources or Legal Department.

NMG has implemented an anonymous ethics hotline that can be used via a 24/7 anonymous phone service or via a web intake site. This ethics hotline is a great alternative if your supervisor is unavailable or involved in the issue, or if you are uncomfortable reporting the problem to the next level of management or to the Human Resources or Legal Department. If you are dissatisfied with the handling of the issue, you can use the anonymous ethics hotline services put at your disposition at all times.

#### How can I report my concern?

- By speaking to my NMG direct supervisor, management or the NMG Human Resources or Legal Department
- Through the anonymous ethics hotline service
  - by phone: (833) 664-1736
  - via EthicsPoint Web Intake Site: <http://nmg.ethicspoint.com/>

#### What information should I provide?

- a detailed description of the actual or suspected unethical conduct
- the date you became aware of the unethical conduct



- the name of the individual(s) concerned or involved
- steps taken prior to making the report

## **NO RETALIATION**

Employees who report actual or suspected unethical conduct in good faith are doing the right thing. NMG will in no way penalize, discharge, demote, suspend or discriminate against any employee for doing this. This also applies if you are simply asking about potentially unethical conduct or seeking guidance on how to handle a specific situation, or if you collaborate with any investigation of unethical conduct reported under this Policy.

## **INVESTIGATION**

The Audit Committee of the Board of Directors of the Company will investigate reports made under this Policy and make appropriate recommendations to the Board of Directors of NMG. To assist the Audit Committee in addressing such reports, it will designate a person, independent of the financial reporting function. Unless otherwise designated by the Audit Committee, the Company's Chief Legal Officer will handle the investigation and reporting processes. The Audit Committee may engage independent advisors at the expense of the Company to undertake investigations and/or recommend appropriate action and shall do so in the event the matter reported involves the Audit Committee. Following an investigation, a confidential report will be prepared and, where a breach of the Code or other applicable policies is found to have occurred, NMG will impose appropriate corrective measures, including disciplinary action, up to and including termination of employment.

**All parties to an investigation will be treated fairly and equitably.**

## **CONFIDENTIALITY**

NMG will preserve the confidentiality of a person who submits a report on an anonymous basis or otherwise, the source or nature of the unethical conduct reported and the steps required to be taken to investigate the unethical conduct reported.

**Why is it important to promptly report a suspected or actual violation?**

This helps NMG to:

- quickly correct mistakes (whether intentional or resulting from bad judgment)
- prevent or minimize liabilities or harm to others
- preserve our corporate integrity and reputation
- safeguard our commitment to maintaining high standards of integrity in our business

**Approved by the Board of Directors on September 15, 2021.**