

WATER STEWARDSHIP POLICY

2023



NOUVEAU MONDE GRAPHITE

WATER STEWARDSHIP POLICY

At Nouveau Monde Graphite (“NMG”), we consider water to be a collective resource that must be protected and managed responsibly. Being a shared resource, we accept our share of responsibility in ensuring that our employees and communities have access to water that is safe for public health and ecosystems. This policy sets out our commitments to water protection and preservation, and complements our Sustainable Development Policy and Environmental Policy.

One of the main objectives behind our “Zero Harm” philosophy is to limit our environmental impact while contributing to the prosperity of the community. We aim to reduce and manage the risks associated with our operations on ecosystems, limit our footprint, maximize water reuse, and ensure environmental protection.

Our tailings management system has been designed to prevent acid mine drainage and potential water contamination at our mine site in accordance with best practices guided by the Canadian Mining Association's Towards Sustainable Mining Protocols, ICMM's Global Industry Standard on Tailings Management, the International Network for Acid Prevention, and the Mine Environment Neutral Drainage Program (Canada).

OUR COMMITMENTS

Water governance

- » Ensure integrated management of water-related risks at all stages in the life cycle of our projects, including mine closure; In line with best practices, we are working to establish a clear structure of responsibility and accountability for water and tailings management.
- » ;
- » Ensure adequate training to employees and contractors at our sites on water stewardship and associated environmental management measures;
- » Report and communicate our water management performance and practices on an annual basis;
- » Ensure that impacts on sound water management are assessed and integrated into our design, infrastructure, and business planning, including impacts that may arise from climate change;
- » Comply with the laws, regulations, and other environmental requirements specific to our projects, and strive for alignment with sector-specific highest standards.

Efficient water management

- » Identify, monitor, avoid, mitigate, and manage our impacts on the water and hydrogeological system, including potential cumulative effects and impacts on watersheds near our operations;
- » Adapt our practices with a view to continuous improvement in order to reduce our footprint and proactively manage the quantity and quality of water flowing from our sites;
- » Ensure access to drinking water for our employees and subcontractors on our sites, as well as access to inclusive sanitary facilities;
- » Ensure personal safety and environmental protection in aquatic, wetland and riparian environments;

- » Prepare and implement emergency and spill response plans to deal with the potential repercussions of unforeseen events;
- » Ensure water management using performance indicators and targets, to guarantee use and return to the environment that meets the highest standards.

Collaboration with our stakeholders

- » Maintain ongoing engagement with Indigenous Peoples, our communities, watershed representatives, land users and our various stakeholders, ensuring that they are involved in our integrated water management planning, taking their concerns into account and maintaining a high level of transparency;
- » Demonstrate leadership by adopting best practices and actively participating in local, governmental and sectoral initiatives aimed at encouraging consistent and efficient water management;
- » Encourage initiatives that create value, personal commitment and accountability of all employees and contractors toward water management.

SCOPE OF THE POLICY

This policy covers all our activities, products, and services, and provides our employees, suppliers and contractors, community members, customers, shareholders and partners with a frame of reference for water management adapted to the stage of development of our projects and operations.

This policy is supported by our health, safety, environmental, sustainable development and social commitment standards, as well as other internal guidelines, and will be regularly reviewed and updated as required.

The President and CEO is responsible for the success of this policy, with the support of our Vice President, Environment and Sustainable Infrastructure, who is responsible for the deployment, annual review, and update of the policy.

Approved by the Board of Directors on November 7, 2023.