



# **FIGHTING AGAINST FORCED LABOR AND CHILD LABOR REPORT**

Disclosure related to Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

For the year ended December 31, 2024

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## 1. INTRODUCTION

This report (the “Report”) is prepared by Nouveau Monde Graphite Inc. (“NMG” or the “Company”) in order to meet the requirements of the Canada’s *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Bill S-211) (the “Act”) for the year ended December 31, 2024. This is the second year of publication. It has been reviewed and approved by the Company’s Board of Directors.

The Report sets out the steps taken by NMG to prevent and reduce the risk that forced labor or child labor be used at any step of the production of goods in Canada or elsewhere, or of goods imported into Canada by NMG.

### Forward-Looking Statement

This Report contains “forward-looking information” and “forward-looking statements” within the meaning of applicable securities legislation (collectively, “forward-looking statements”), which relate to future events or future performance and reflect management’s expectations and assumptions regarding the Company’s results and performance. Such forward-looking statements reflect management’s current beliefs and are based on information currently available to it. In some cases, forward-looking statements can be identified by words such as “may”, “would”, “could”, “will”, “should”, “expect”, “intend”, “aim”, “attempt”, “anticipate”, “believe”, “study”, “target”, “estimate”, “forecast”, “predict”, “outlook”, “mission”, “aspire”, “plan”, “schedule”, “potential”, “progress” or the negative of these terms or other similar expressions concerning matters that are not historical facts.

In particular, statements regarding the Company's corporate objectives and business strategy including, without limitation, the “About NMG” paragraph, the Company's aspirations, targets, commitments and goals, the Company’s focus on leveraging its world-class mineral assets and technology portfolio to develop what is projected to be one of North America’s first, largest, and fully integrated natural graphite productions, the possibility for its supply chain is set to change significantly, the Company’s efforts and strategies to address forced labor or child labor, and any information as to future plans and outlook for the Company are or involve forward-looking statements.

Forward-looking statements are based on reasonable assumptions that have been made by the Company as at the date of such statements and are based on current expectations, estimates, and projections about the Company’s business and the industry in which it operates, as well as management’s beliefs and assumptions as of the date of this Report.

These forward-looking statements are not guarantees of future performance and are subject to known and unknown risks, uncertainties and other factors that may cause the actual results, level of activity, performance or achievements of the Company to be materially different from those expressed or implied by such forward-looking statements due to various factors, including but not limited to changes in economic and market conditions, regulatory and legal developments, and other risks and uncertainties.

Investors and stakeholders are cautioned not to place undue reliance on this Report.

Except for any legal terms that are mandatory and cannot be waived, the Company accepts no responsibility for any loss, damage, cost or expense (whether direct or indirect) incurred by any person as a result of any error, omission or misrepresentation in information in this Report.

## 2. ABOUT NMG

NMG was incorporated on December 31, 2012, under the Canada *Business Corporations Act*. The Company's headquarters are located at 481, rue Brassard, Saint-Michel-des-Saints, Québec, Canada, J0K 3B0. Its shares are publicly traded under the symbol NOU on the Toronto Stock Exchange (“TSX”) and NMG on the New York Stock Exchange (“NYSE”).

NMG is an integrated company developing responsible mining and advanced processing operations to supply the global economy with carbon-neutral active anode material to power electric vehicles (“EV”) and renewable energy storage systems. The Company is developing a fully integrated ore-to-battery-material source of graphite-based active anode material in Québec, Canada. With recognized ESG standards and structuring partnerships with anchor customers, NMG is set to become a strategic supplier to the world’s leading lithium-ion battery and EV manufacturers, providing advanced materials while promoting sustainability and supply chain traceability.

### Our Operations

Based in Québec, Canada, NMG is focused on leveraging our large mineral assets and technology portfolio to develop one of North America’s first and fully integrated natural graphite productions.

A diverse team of over 110 employees is actively engaged in supporting operations at the Company’s Phase-1 facilities, while preparing to bring the Phase-2 Matawinie Mine and Bécancour Battery Material Plant to the commercial stage, and planning the development of the Uatnan Mining Project as an expansion Phase 3.

NMG’s employees, assets, and operations are entirely located in Canada (100%), a conflict-free and low risk area as per the Organisation for Economic Co-operation and Development (“OECD”)’s criteria.

Our human resources processes and practices are conducted in accordance with the Québec *Charter of Rights and Freedoms*, the Québec *Labour Code*, and the *Canadian Charter of Rights and Freedoms*. The Company condemns forced labor and child labor, and adheres to Québec’s new bill *Respecting the Regulation of Child Labour* when considering the recruitment of teenagers for occasional or summer employment.

All employees must sign and adhere by NMG’s [Code of Conduct](#), in addition to our [corporate policies](#).

### Our Procurement

We highly value our relationships with our suppliers and contractors, recognizing them as an extension of our business in their interactions with our communities and stakeholders. They represent an important lever to support our efforts for environmental stewardship and socioeconomic development. With this in mind, we set clear expectations regarding compliance, ethical business conduct, labor and human rights, health and safety, environmental protection, and meaningful engagement with local communities and Indigenous Peoples. By fostering responsible partnerships, we enhance our impact and ensure that our supply chain aligns with our core values.

NMG’s [Responsible Procurement Policy](#) guides our procurement practices emphasizing local and Indigenous sourcing, environmental and social performance, adherence to NMG’s values, and

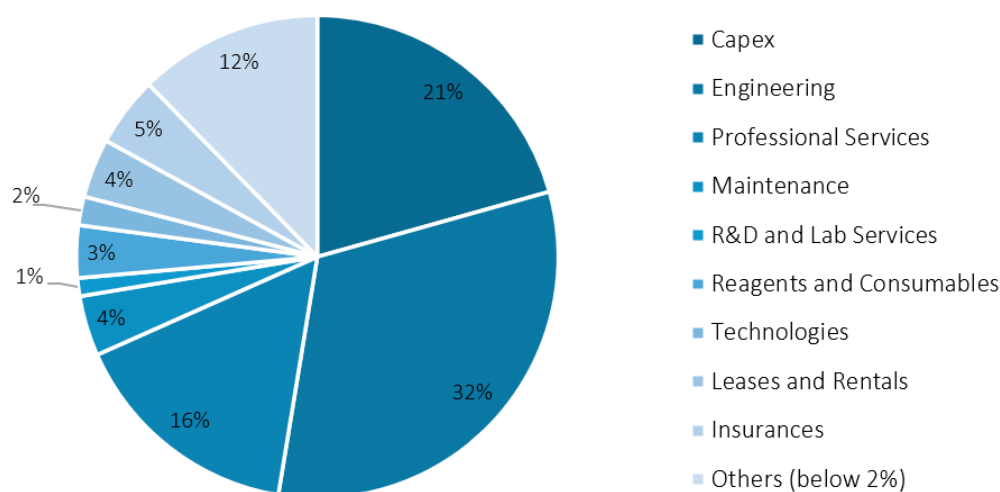
transparency. Upon initiating a business relation with NMG, all suppliers must sign and confirm their adherence to our [Supplier Code of Conduct](#).

Procurement is managed through a centralized process that strives to ensure compliance with NMG’s programs and provide the contractual framework for addressing non-compliances.

## Our Supply Chain

NMG predominantly sources goods and services from Québec, Canada, representing 79% of total expenditures in 2024. With a focus on developing our Phase-1 operations, preparing for the construction of our Phase-2 facilities, and securing financing, a significant portion of our sourcing is associated with CAPEX (e.g. equipment, building materials, construction contracts, etc.), engineering, professional services (e.g. consultants, legal fees, accounting services, etc.), maintenance, as well as reagents and consumables.

**Primary Procurement Categories**



A substantial portion of our procurement is carried out in low-risk countries, including Canada (87%), the United States (8%), and Europe (2%).

As the Company advances its development, significant changes are anticipated in its supply chain.

**Demonstration stage:** This stage represents a smaller-scale version of NMG’s commercial operations. During this phase, NMG focuses on optimizing its processes and qualifying its products, which necessitates the purchase of limited volumes and/or capacities of specialized equipment and production consumables.

**Construction stage:** The construction stage of NMG’s commercial facilities involves substantial, non-recurring expenses, particularly for industrial equipment and construction contracts. At this stage, most specialized equipment will likely need to be sourced from outside Canada due to a lack of local supply, while construction contracts are projected to be mainly awarded to Québec businesses.

**Commercial production stage:** NMG’s commercial activities are expected to increase the demand for consumables and professional services. The Company will seek to establish longer-term contracts for its operating expenses and recurring purchases.

### 3. STEWARDSHIP

#### Corporate Commitment

NMG adheres to rigorous standards of corporate stewardship, striving to prevent or mitigate human rights risks within our operations and throughout our supply chain. To address the complexities of global supply chains and uphold our commitment to ethical business practices, NMG has implemented a comprehensive set of policies across the Company, which are regularly reviewed and updated. These policies namely include:

- » [Code of Conduct](#)
- » [Supplier Code of Conduct](#)
- » [Human Rights Policy](#)
- » [Responsible Procurement Policy](#)
- » [Grievance Policy](#)
- » [Whistleblower Policy](#)

Our Responsible Procurement Policy ensures that purchasing decisions are made with ethical sourcing and sustainability in mind. This policy is directly aligned with our Human Rights Policy dedicated to protecting the rights and dignity of individuals inside and outside our Company, along with strict measures against forced and child labor.

In addition, our Supplier Code of Conduct sets out expectations and requirements for all suppliers, requiring compliance with labor laws, environmental standards, and ethical practices. This code reinforces our commitment to responsible sourcing by demanding transparency and accountability in all aspects of the supply chain. It requires all suppliers to commit to the same standards as NMG.

Our Whistleblowing Policy provides a secure and confidential mechanism for employees, suppliers, and stakeholders to report any inappropriate behavior or violations of our policies. It helps to safeguard the integrity of our operations and supply chains, and ensures that any issues are dealt with quickly and effectively in a confidential manner.

These policies are reviewed and adopted by the Board of Directors, then deployed internally to all employees and, where appropriate, to contractors operating on our sites. In addition, they are publicly available on the Company's website as a reference to suppliers' during tendering processes and as a demonstration of our commitments to regulators and stakeholders.

Together, these policies provide a foundation for responsible business conduct and demonstrate NMG's commitment to ethical practices and human rights.

#### Governance and Accountability

Corporate governance provides a clear framework of ethics, oversight, structure, and accountability that is reflected in all aspects of our business. Our Board of Directors oversees the Company's business conduct and management's responsibilities. It upholds the Company's long-term vision with stakeholders in mind, weighing in on business orientation and performance, capital strategy, oversight of risks and opportunities, and ESG principles integration.

A dedicated Board committee – the ESG Committee – provides corporate direction to, monitors, and reviews social and environmental management systems, policies and programs, and targets to assist the Board of Directors in overseeing the Company's performance in these areas, including

human rights. It reviews the Company's material reports about ESG performance, including the content of this Report.

In addition, the Company's ESG Strategy, Procurement, Legal, and Operations teams work closely together to advance responsible procurement practices, ensure alignment with regulatory requirements, and manage associated risks and opportunities.

We are diligent in ensuring that we do not violate, either directly or through the complicity of others, the human rights of our employees, contractors, members of local communities, First Nations, and other stakeholders likely to be affected by our business activities. We require of our suppliers and business partners their shared commitment and an appropriate framework of policies and programs.

NMG annually reports its managerial approach and performance against international disclosure standards, namely the Global Reporting Initiative ("GRI"), the Value Reporting Foundation (SASB Standards) for the Metals & Mining sector, and the United Nations Global Compact's ("UNGC") Ten Principles. Specific indicators are included in the Performance section of this Report.

## Regulatory Framework

The Company complies with Canada and Québec's applicable regulations on human rights, child labor, and forced labor, namely Québec's *Charter of Human Rights and Freedoms*, the *Canadian Charter of Rights and Freedoms*, and Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

## Recognized Standards

NMG aligns its practices with international standards regarding anti-forced labor and anti-child labor, particularly the human rights standards set out in the *Universal Declaration of Human Rights* and the *International Labour Organization's Declaration on Fundamental Principles and Rights at Work*. In addition, NMG adheres to the principles set out in the *Convention on the Rights of the Child*, the *United Nations Guiding Principles on Business and Human Rights*, and the Ten Principles of the UNGC.

While not required at this stage of the Company's development due to the location of our operations and the nature of our supply chain, NMG also considers the OECD *Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected*.

In preparation for its commercial Phase-2 operations, NMG is implementing the Mining Association of Canada's *Towards Sustainable Mining* framework ("TSM"), a globally recognized performance system that assists mining companies in evaluating and managing their environmental and social responsibilities. The TSM includes a specific protocol on Preventing Child and Forced Labor, as well as a supplement on Responsible Sourcing Alignment. Additionally, NMG is implementing the Initiative for Responsible Mining Assurance ("IRMA")'s *Standard for Responsible Mining and Mineral Processing* which namely include requirements on human rights and due diligence, as well as fair labor and terms of work.

NMG is also incorporating the International Finance Corporation ("IFC") *Performance Standards* into its activities and management system, including requirements related to the Performance Standard 2 on labor and working conditions.

Finally, NMG is an active member of the Global Battery Alliance ("GBA") an initiative of the World Economic Forum that promotes responsible and ethical practices throughout the battery value

chain. As part of this organization, NMG supports the development of a *Battery Passport*, which attests to the environmental and social compliance of batteries. Guided by ten key principles, the GBA strives to ensure that critical materials are produced, sourced, processed, transported, manufactured, and recycled responsibly.

## 4. RISK MANAGEMENT

Certain aspects of our business and supply chains could present a higher risk of forced or child labor, primarily in the international sourcing of specialized equipment, materials, and/or components. In some jurisdictions, where the regulatory framework may be less stringent than in Canada, ensuring full visibility and oversight of suppliers' practices can be challenging. This underscores the importance of rigorous due diligence and continuous monitoring to mitigate such risks.

### Training and Awareness

In 2024, we emphasized responsible procurement by building on training previously carried out and deploying our updated Code of Conduct, Supplier Code of Conduct, Responsible Procurement Policy, and Human Rights to employees and suppliers.

A multidisciplinary team has been mobilized to enhance procurement and due diligence processes, with a specific focus on addressing modern slavery risks, thereby developing awareness and capacity within key services.

### Preventive and Corrective Actions

Through its enterprise risk management framework, the Company monitors its exposure, manages its risk profile, and shapes its strategic approach. Social risks, including human rights, are examined in the yearly annual review, which informs the Company's overall risk management plan.

In 2024, NMG implemented an environmental and social management system ("ESMS"), a comprehensive framework that integrates environmental and social requirements, commitments and practices into NMG's operations, with the objectives of managing risks, improving performance, and ensuring compliance. It namely supports the review and improvement of practices related to human rights and responsible procurement, through a structured Plan-Do-Check-Act (PDCA) cycle, ensuring continuous improvement. The ESMS will expand as we transition from Phase-1 operations to construction and commercial Phase-2 operations.

As part of our procurement business processes, we are implementing a risk assessment matrix to evaluate suppliers' likelihood of human rights issues based on geographic and sectorial criteria. Using the Global Slavery Index, we assess modern slavery risks, including forced labor and child labor. Additionally, we assess sectoral risks through SASB's *Materiality Map Finder*, focusing on workforce health and safety, diversity and inclusion, working conditions, and human rights. Suppliers are categorized into high (> 0.8), moderate (> 0.5), or low ( $\leq$  0.5) risk levels, with corresponding evaluation, monitoring, and audit procedures to ensure compliance with NMG's human rights standards. Suppliers identified as high risk are required to complete a human rights questionnaire and subjected to a media surveillance to detect incidents or potential issues. An on-site audit may also be carried out directly by NMG or a third party. This risk assessment, conducted



during the pre-qualification process aims at excluding suppliers with a poor track record or non-compliance with our standards.

More generally, random audits can be carried out at our suppliers to ensure the adhesion to requirements. In the event of non-compliance following an audit, or as a result of concerns raised by employees, business partners, or monitoring systems, NMG will require from the supplier to develop and deploy a detailed action plan. It may even consider terminating its business relationship in some circumstances.

Media surveillance for the year 2024 was conducted on all active suppliers to detect any incidents and/or non-compliance during their period of work for NMG.

Any potential violation of the Company's Code of Conduct, policies, applicable laws or regulations, including any conversations or incidents that raise doubts about the use of forced labor or child labor, may be reported via the confidential Ethics Helpline at any time by calling +1 833 664-1736, or via the EthicsPoint website at <http://nmg.ethicspoint.com>. The Company strives to ensure the accessibility, effectiveness, and continuous improvement of this grievance mechanism.

## Standard Contractual Terms and Conditions

Suppliers are required to confirm their adherence to the Supplier Code of Conduct prior to initiating any business relationship with the Company.

The Company expects its contractors and suppliers to uphold human rights standards, including those related to child labor and forced labor. Therefore, the Company includes standard terms and conditions into its agreements, reflecting principles and obligations aligned with the Canada *Fighting Against Forced Labour and Child Labour in Supply Chains Act*. In addition, the agreements require contractors and suppliers to represent and warrant the following:

- a) The binding nature of the principles and obligations related to child labor and forced labor;
- b) Consideration of the applicability and enforceability of these principles and obligations in their proposal and/or submission;
- c) Full compliance with these principles and obligations;
- d) The implementation and adherence to these principles and obligations during the performance of services;
- e) The preparation and provision of data, certifications, statements, signatures, and other required information to demonstrate compliance with the terms related to child labor and forced labor within specified time frames;
- f) Granting the Company, or its authorized representative, the right to conduct periodic audits of their supply chains to verify compliance;
- g) Ensuring that any subcontractor proposed by the contractor or supplier, or accepted by the Company, complies with the principles and obligations set forth, and completes any necessary forms required by the Company to assess the risk of child or forced labor within its supply chains.

When the counterparty's terms and conditions are used instead, the Company negotiates to incorporate human rights standards, including those related to child labor and forced labor, ensuring alignment with the Act's principles and obligations.

Contractual terms also include the mandatory collection of key social metrics for construction contracts, enabling NMG to obtain transparent, up-to-date information on workforce indicators from suppliers throughout the execution of work.

## Measures Taken to Remediate the Loss of Income

NMG is not aware of any instance where its efforts to mitigate the risk of forced or child labor in its operations and supply chains may have contributed to negative impacts for workers and/or their families. Considering the location and nature of our sourcing, NMG has not implemented any remediation measures addressing the potential loss of income to the most vulnerable families.

## 5. PERFORMANCE AND ASSESSMENT OF EFFECTIVENESS

To monitor the impact of our activities and practices, and strengthen our risk mitigation processes about forced labor and child labor, NMG tracks the following key indicators:

Disclosure	Performance Indicators		Reference
	2024	2023	
Employees having received, read, and signed the Company's Code of Conduct	90% <sup>1</sup>	100%	N/A
Active suppliers having confirmed their adherence to NMG's Supplier Code of Conduct or demonstrated equivalent standards	99%	86%	N/A
Percentage of proved and probable reserves in or near areas of conflict	0%	0%	SASB EM-MM-210a.1
Percentage of expenses in Canada	87%	86%	N/A
Percentage of expenses in low-risk countries	98%	99%	N/A
Whistleblowing reports for violations or unethical conduct	0	0	N/A
Occurrences of child labor	0	0	GRI 408 UNGC Principle 5
Occurrences of forced or compulsory labor	0	0	GRI 409 UNGC Principle 4
Complaints or violations related to human rights	0	0	UNGC Principle 2
Risk distribution of active suppliers		–	N/A
- High risk ( $\leq 0.8$ )	0		
- Moderate risk ( $\leq 0.5$ )	71		
- Low risk ( $> 0.5$ )	371		
Active suppliers covered by media monitoring	100%	–	N/A

NMG has put initiatives in place to determine the effectiveness of the efforts it deployed to ensure forced labor and child labor are not being used and will continue to improve and refine key performance indicators in this regard.

<sup>1</sup> Code of Conduct revision approved in Q3-2024.

## 6. APPROVAL

This Report was reviewed by the Board of Directors' ESG Committee and approved by the Board of Directors on March 26, 2025. The Report along with the policies mentioned herein and the Company's annual ESG Report, which provides in depth information about NMG's managerial approach to social risks and opportunities, may be found on our website at [www.NMG.com](http://www.NMG.com).

In accordance with the requirements of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and in particular section 11 thereof, we attest, in our capacity as Directors of NMG and not in our personal capacity, that we have reviewed the information contained in the Report. Based on our knowledge, and having exercised reasonable diligence, we attest that the information in the Report is true, accurate and complete in all material respects for the purposes of Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, for the reporting year listed above.

MONTRÉAL, March 26, 2025

(signed) Arne H Frandsen

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Arne H Frandsen  
Chair of NMG's Board of Directors

(signed) Eric Desaulniers

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Eric Desaulniers, MSc, géo.  
Director, and President and Chief Executive  
Officer