Sustainability Policy



OUR APPROACH AND COMMITMENT TO SUSTAINABILITY

At Northern Graphite our approach to sustainability started from a singular ambition: to build an integrated mine to market graphite solution to support the green energy transition. This approach is underpinned by our 4 "C's" core values of Care, Create, Commit and Collaborate.



Graphite and graphite products are the basis of the green energy transition. Also, for the global reduction of carbon emissions, we are committed to mining and producing our graphite products in a way that supports a cleaner future and leaves a positive impact in the communities where we operate.

To deliver this sustainable business strategy, Northern will focus over the long term on measurable and sustainable environmental, social and governance (ESG) performance.

Northern believes that ESG performance is reflective of leadership, risk management capacity and responsible business practice. It is our intention to do this, with the support and cooperation of host communities and key stakeholders. We shall manage our risks, address the gaps and develop opportunities to ensure that we share value and engage all of our stakeholders.

We recognise our ecosystem. Our key assets are our people, our workers, the land we work on, the air, the water as well as the biodiversity where we work.

To meet our goals, we are focusing on developing the right culture and interest in our people, encouraging them to work together and connect across our partnerships to find new solutions for a cleaner planet.

To achieve our goals, we commit to following the guidelines established by leading Canadian industry associations: *Towards Sustainable Mining (MAC)*, as well as the United Nations Sustainable Development Goals (SDG's), The Initiative for Responsible Mining Assurance (IRMA) and ISO 140001.

Embedded within our core values is the importance that Northern Graphite places on our employees, the environment and the communities in which we live and work. The foundation of our business is driven by our purpose, and the way we work by our code of business conduct, our observance of the Modern Slavery Act, and our Inclusion & Diversity and whistleblower policies.

HEALTH AND SAFETY

At the heart of our approach to Health and Safety is our value of care. We make the safety and wellbeing of our employees, contractors and communities our number one goal always. We operate in an environment where every person goes home safe and healthy every day.

Ours is a risk-based approach, starting with compliance to relevant sites laws and local regulations. We ensure our people have appropriate training, relevant processes, procedures and the correct PPE to undertake their jobs every day. We implement continuous improvement processes and training to ensure our practises and procedures are reviewed regularly and are aligned with the best industry standards.

We take a proactive approach to worker health and safety, including mental health and well-being.

ENVIRONMENT

As our products are fundamental to a low carbon future, we strive to minimise our environmental impact across our operations. Northern is committed to integrating environmental sustainability into all aspects of our operations and decisions.

Northern has set an ambitious target of net zero by 2050 and a carbon neutral product stream by 2039. To support this, we will prioritize the use of renewable energy sources and increase energy efficiency across all departments. Our goal is to transition towards 100% renewable energy for our operations, investing in technologies that lower energy consumption and reduce carbon emissions.

To support our net-zero target, we prioritize waste reduction. We aim to minimize waste sent to landfills through effective waste management programs and encourage circular economy principles by reusing materials and recycling wherever possible. We will also work with suppliers to reduce packaging waste and promote environmentally friendly products.

Our procurement processes help us source materials and products that have minimal environmental impact. This includes selecting suppliers who adhere to sustainable practices, promote fair labor conditions, and minimize their carbon footprint. We will favor eco-friendly materials and products made from renewable or recycled resources.

Reducing water consumption and preserving water quality in the communities we operate is important to the way we work. We will implement water-saving initiatives throughout our operations, focusing on reducing water usage, ensuring proper wastewater treatment, and promoting water-efficient technologies. Our goal is to decrease overall water consumption while maintaining the health and safety of our operations.

Our operations are in regions that have unique and diverse biodiversity and ecosystems. We aim to support conservation efforts, mitigate habitat destruction, and integrate natural solutions into our processes wherever possible. We aim to focus on actions that enhance environmental restoration and avoid practices harmful to local ecosystems.

Finally, we engage our employees in all levels of our environmental initiatives and provide training and resources to encourage responsible environmental behaviour. Through our ongoing monitoring and reporting we make continuous improvements to our systems.

We are dedicated to sustainable growth, ensuring that our business practices support both current and future generations.

PEOPLE AND COMMUNITIES

Our commitment to people and communities is rooted in our core values: Care, Collaborate, Create, and Commit. We seek to establish environments that are conducive to improving living conditions through investments in community projects, job creation, training, and improving the quality of life of the people and communities where we work.

As we grow our operations, we strive to create lasting partnerships with local communities at every stage. These partnerships will be built on respect for human dignity, individual and community rights, mutual trust, shared objectives, and active involvement. We partner with our suppliers to ensure we respect human rights as well as local cultures and values in the communities in which we operate.

Through our Inclusion and Diversity and Modern Slavery Act & Policies, we ensure fair and equitable opportunities for all employees in our organization.

GOVERNANCE

Our approach starts with compliance with relevant laws and regulations. We have the courage and commitment to doing what is right, not what is easiest. We maintain our focus on ethics, transparency and building mutual trust. We support and encourage further action by helping to identify, develop and implement world class practices through the application of our Group wide standards.

We have implemented strong governance at the board level and across our organization to ensure compliance. The board guides management in conducting business in accordance with all applicable laws, regulations, and high ethical standards to drive long-term value.

To support its work, the board has established a clear mandate, committee charters, and policies. It discharges its duties either directly or through key committees, including the Audit Committee, the Compensation Committee and the Environment, Social, Governance (ESG) and Nominating Committee. Each committee operates under a charter outlining its responsibilities and duties, which is reviewed annually.

Management has established a framework of programs, policies, and plans to achieve our sustainability and climate-related objectives and these elements continue to evolve to suit our business needs. Under this management framework, performance on objectives and key

performance indicators are routinely monitored and reported on a suitable frequency. This is crucial to mitigating regulatory risks. We maintain transparent relationships with regulating bodies at the provincial and national levels. Through strong oversight of our activities, frequent site visits, open communication, and effective reporting, we ensure compliance with applicable laws and regulations. In addition, we are kept abreast of upcoming or new regulations through our membership in industry associations, legal advice, and government relations. Through this ongoing monitoring of the regulatory environment, we are able to review and refresh our management systems to ensure compliance across all areas.

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Northen Graphite, CEO

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