



Northern Graphite Corporation

Forced Labour and Child Labour in Supply Chains Company Assessment FY2025

May 31, 2026

Structure

Northern Graphite Corporation is a global graphite producer and developer focused on the production of natural graphite and the development of battery anode materials. The Company is North America's only producer of natural graphite and plays a critical role in supporting the electrification of transportation and energy storage through the secure supply of graphite and the advancement of downstream carbon and battery material capabilities. Northern Graphite Corporation is a Canadian entity listed on the TSX Venture Exchange, with its headquarters in Ottawa, Ontario, Canada.

This report covers the financial year from January 1 to December 31, 2025. In 2022, the Company acquired the producing Lac-des-Îles graphite mine in Québec, Canada, as well as the Okanjande graphite deposit and the Okorusu processing plant in Namibia. The Company operates through several subsidiaries, including Graphite Nordique Inc. in Canada, and Northern Graphite Processing Limited, Northern Graphite Holdings Limited, and Northern Graphite Okanjande Mining Limited in Namibia.

In 2024, the Company established Battery Materials GmbH in Germany and maintains additional offices in Italy. The Company operates across multiple locations, including corporate offices in Ottawa, Ontario, and Laval, Québec, a producing mine at Lac-des-Îles, Québec, and a development project at Bissett Creek, Ontario. The Company is also advancing plans to develop and construct battery anode material production facilities, including in Baie-Comeau, Québec.

Northern Graphite Corporation employs a total of 78 people across its global operations, including 59 in Canada, 10 in Germany, 1 in Belgium, 4 in Italy and 4 in Namibia. The Company is governed by a Board of Directors and led by an executive management team comprising the Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Chief Technical Officer, Chief Product Officer and Chief Commercial Officer.

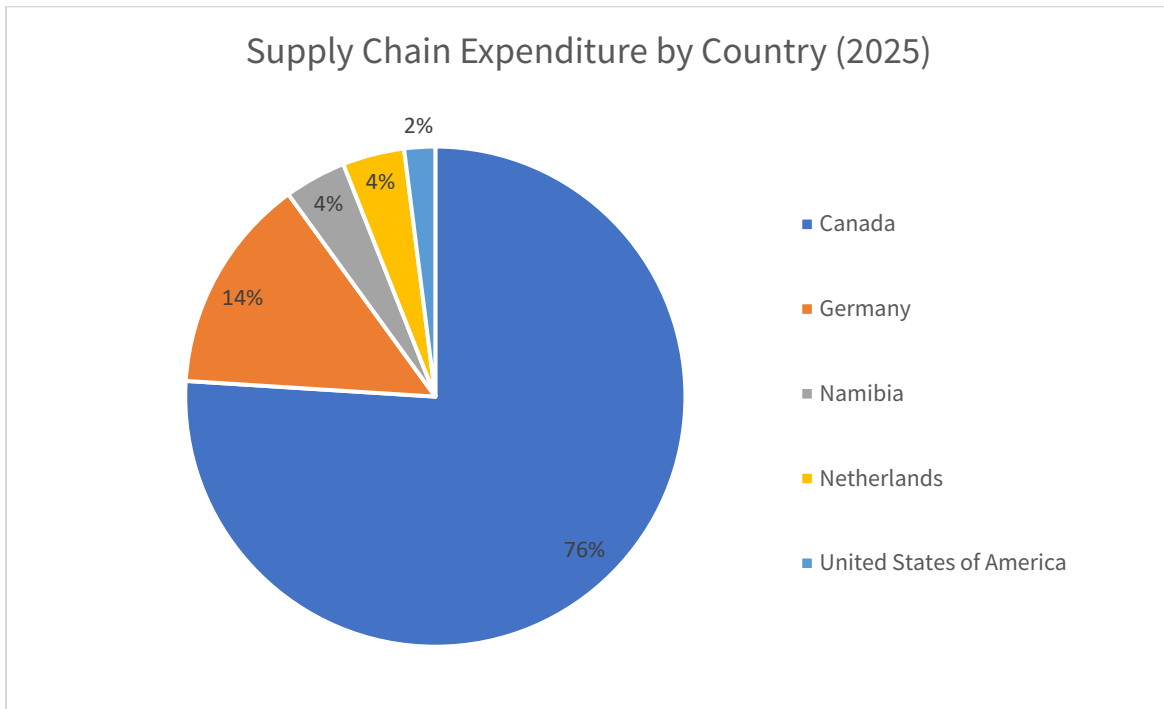
Activities

Northern Graphite Corporation's current activities include mining and processing natural graphite into concentrate and value-added products for industrial and specialty applications. The Company supplies graphite products used in applications such as refractory materials for steel production, heat management in electronics, and friction and lubrication products for automotive and industrial uses, as well as other specialty applications. Through its subsidiary, Battery Materials GmbH, the Company is advancing the development and production of carbon-based materials for batteries, with a focus on refining natural graphite into Battery Anode Material and supporting the commercialization of downstream battery applications.

In addition, the Company licenses its carbon material processing technology to third parties to support the development and commercialization of synthetic carbon and related materials. These licensing arrangements are commercial in nature and do not involve the direct sourcing of materials or integration into Northern Graphite's supply chain.

Supply Chain

The figure below presents the composition of Northern Graphite’s 2025 supply chain by country, excluding countries that account for less than 1% of total spend. In 2025, the Company engaged approximately 400 suppliers, primarily located in Canada and Germany. Countries representing 1% or more of total supply chain spend include Canada, Germany, Namibia, Netherlands, and the United States of America.



Suppliers which are under 1% of the total supply chain spend and not included in the figure above include: Austria, Belgium, China, Czech Republic, France, Luxemburg, Italy, Mexico, Switzerland and the United Kingdom.

Policies & Due Diligence

Current Policies

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. Through our policies, we have created a foundation to support the prevention of forced labour and child labour through our strong core values. Our ***Code of Business Conduct and Ethics*** demonstrates our commitment to conducting business with honesty, integrity, and fairness. Our guiding principles are to: act ethically and honestly; accept

responsibility and be accountable for our actions; select and treat our employees in a respectful, fair and equitable manner and foster a work environment that is safe and healthy and free from discrimination, harassment, intimidation and hostility of any kind; make decisions which are in the best interests of Northern Graphite; honour our agreements and commitments; conduct our business in an environmentally and socially responsible manner; communicate with all of our stakeholders in an honest and straight-forward manner; and obey all laws governing the conduct of our business.

With a strong commitment to health and safety, we take a zero-tolerance approach to ensure our staff are not put in danger and that every person is safe and healthy every day, both at work and at home.

In our ***Health and Safety Policy***, we state our commitment to complying with Good International Industry Practice, the requirements of the Equator Principles, and the Environmental, Health and Safety Guidelines, and the Environmental, Health and Safety Guidelines for Mining of the World Banking Group. At Northern Graphite, we also require that all suppliers and contractors comply with our health and safety standards and requirements. In the event that a contractor does not comply with our health and safety standards, they are immediately asked to leave our sites and we discontinue any professional relationship. We are committed to investigating all concerns, complaints or incidents of workplace discrimination, violence or harassment in a fair and timely manner, while respecting employees' privacy as much as possible.

In our ***Whistleblower Policy***, we state that we strictly prohibit discrimination, harassment, and/or retaliation against any employee, director or officer who reports a complaint, provides information or assists in an investigation related to the violation of Code of Business Conduct and Ethics or the violation of employment or labour laws. The Whistleblower policy details complaints procedures and Audit Committee procedures.

Within our ***Professional Services Contract***, we state that Northern Graphite seeks to share economic benefits with First Nations and local communities through business and employment relationships, as is demonstrated in our recruitment of local vendors at our Lac-des-Îles and Okanjande sites. We also request that contractors report to us the number of First Nations persons who will be working on-site during the calendar year.

In 2024 we implemented our ***Human Rights Policy Statement*** that describes our commitment to human rights, complying with laws and regulations in which we operate, demonstrating practices consistent with the International Council on Mining and Minerals (ICMM) Indigenous Peoples Position statement, and eliminating all forms of forced or compulsory labour and child labour.

Due diligence

Before engaging with suppliers in Okanjande, we require them to provide a ***Social Security Commission Certificate of Good Standing*** which details the government identification numbers of their employees and proves that they are registered with the Namibian government. This allows us to confirm that all employees are age 18 or older and are legal workers. When we engage suppliers, both in Okanjande and Lac-des-Îles, we ensure all suppliers complete a ***Supply Evaluation Form*** where they input details on any incidents that may have occurred, as well as the products and/or services they are providing. Our team considers any complaints made against suppliers, among other business factors, to determine whether we maintain a commercial relationship with them. Within our ***Supplier Pre-***

Selection Questionnaire, we ask potential suppliers to provide details on their supplier selection and evaluation, their procedure for handling customer complaints, and their health and safety practices.

In Northern Graphite's *Contractor Agreement* and *Professional Services Contract*, we explicitly state that contractors must comply with health and safety policies, and laws governing industrial accidents and working conditions, including labour laws. All contractors and their employees in Namibia are required to complete a two-day Prevention Program Training prior to commencing work or accessing site operations. We further require that all contractors comply with applicable health, safety, and labour standards, and explicitly state that any failure to meet these requirements or breach of safety codes and health regulations may result in disciplinary measures, including employee suspension, suspension of operations, or termination of the Contractor Agreement.

At Lac-des-Îles, contractors are required to comply with all site-specific health and safety policies, applicable labour laws, and operating procedures, and must ensure that their personnel are appropriately trained, qualified, and experienced. Prior to commencing work, contractors undergo site induction and safety orientation and are required to comply with site rules, permit-to-work systems, and ongoing safety requirements throughout the duration of their activities.

Fundamental to our business philosophy is community engagement, lasting partnerships, and the respect for the culture and welfare of our local communities. Central to this is respecting human dignity and the rights of individuals and communities, while holding mutual respect and trust, establishing agreed objectives and sharing involvement. As described in our *Corporate Social Responsibility Policy*, we seek to create working environments that improve living conditions by investing in community projects, conducting training, and creating jobs for the local community.

Northern Graphite is also a *member of the Chamber of Mines of Namibia*, which is a member-based organization responsible for the stewardship of mining, exploration and associated activities for the benefit of all stakeholders. Membership includes the obligation to adhere to the Chamber Constitution and Code of Conduct and Ethics. We are also a *member of the Québec Mining Association* which encourages its members' work in the area of the environment, health and safety, research and technological development, training, human resources management, and community relations.

In 2024, we implemented our first Annual Sustainability Questionnaire, which is used to assess whether our suppliers adhere to the UN Guiding Principles on Business and Human Rights and the International Labour Organization Conventions, while also providing detail on their practices. We repeated this in 2025. The questionnaire includes specific questions regarding whether suppliers conduct human rights assessments within their own supply chains and requires suppliers to describe their ethical sourcing practices. The questionnaire is applied across Northern Graphite's supplier base, including suppliers supporting operations in Canada, Germany, Italy, and Namibia.

Risk Identification & Management

Countries of Operations and Risk

Using the Walk Free Global Slavery Index, the U.S. Department of Labor List of Goods Produced by Child Labor or Forced Labor, and internal assessment of operational context and supplier controls, we had a risk assessment conducted on our countries of operations. Country risk ratings reflect both external

indices and Northern Graphite’s direct operational oversight, supplier monitoring practices, and the level of control exercised over local activities. These indexes use in-depth research in the area of forced labour and child labour and indicate the risks associated with each country. All countries of operation are assessed as low risk based on Northern Graphite’s direct operational control, regulatory oversight, and supplier verification processes.

Country	Employees as of 2025 (#)	Residual Operating Risk
Canada	59	Low
Namibia	4	Low
Germany	10	Low
Italy	4	Low
Belgium	1	Low

Countries of Suppliers and Risk

Using a combination of the Walk Free Global Slavery Index, the U.S. Department of Labor List of Goods Produced by Child Labor or Forced Labor, and internal assessment of supplier risk exposure, we had a risk assessment conducted on the countries of suppliers. This index uses in-depth research in the area of forced labour and child labour and indicates the risks associated with each country. We found that there was an inherent high risk of forced labour or child labour in China and Mexico. This does not mean that evidence of forced labour or child labour was found to support this risk analysis, but that there is an increased inherent risk which necessitates closer scrutiny by Northern Graphite to ensure those risks do not flow through to our suppliers’ countries.

Country	Suppliers (Number)	Suppliers (Number) in %	Inherent Risk per Country
Austria	1	<1%	Low
Belgium	7	2%	Low
Canada	230	57%	Low
China	3	<1%	High
Czech Republic	1	<1%	Low
France	1	<1%	Low
Germany	59	15%	Low
Luxembourg	1	<1%	Low
Italy	26	6%	Low
Mexico	1	<1%	High
Namibia	57	14%	Low
Netherlands	2	<1%	Low
Switzerland	1	<1%	Low
United Kingdom	1	<1%	Low

Type of Goods Procured and Risk

Using the Walk Free Global Slavery Index, the U.S. Department of Labor List of Goods Produced by Child Labor or Forced Labor and additional recognized modern slavery risk guidance, Northern Graphite conducted a risk assessment of the categories of goods and services procured from its suppliers. These frameworks draw on extensive research relating to forced labour and child labour and identify categories of goods associated with elevated inherent modern slavery risk.

The assessment identified elevated inherent risk within several procurement categories, particularly PPE, garments and consumer industrial goods, food and agriculture, mining and industrial inputs, chemicals and plastics, and electronics-related supply chains. These categories were assessed as carrying higher inherent risk due to the nature of their upstream supply chains, labour intensity, and the complexity of global sourcing networks. Categories associated primarily with logistics, industrial services, technical goods, and administrative or professional services generally demonstrated lower residual exposure, as risks in these areas are primarily driven by labour conditions rather than inherent commodity characteristics.

The assessment further incorporated supplier country exposure as a moderating factor to reflect Northern Graphite's actual sourcing footprint. While certain categories included limited exposure to high-risk sourcing jurisdictions such as China and Mexico, the organization's supplier base remains predominantly concentrated in lower-risk jurisdictions, including Canada, Germany, Italy, Netherlands, Namibia, and the United States.

As a result, the overall assessment supports a balanced and proportionate risk profile. While country-level exposure may mitigate certain risks, categories with inherently higher-risk supply chains continue to be assessed at medium-to-higher overall risk levels. Consequently, the majority of elevated risks are concentrated within specific commodity categories rather than across the supplier base as a whole.

Based on the information currently available to the Company, the assessment did not identify evidence of forced labour or child labour within Northern Graphite's supply chain. Rather, it identifies categories where there is an elevated inherent risk of exposure to forced labour or child labour, requiring enhanced due diligence and ongoing monitoring. Northern Graphite therefore continues to assess where suppliers source their goods, monitor the types of goods procured, and evaluate the potential risk of forced labour and child labour associated with those goods and their upstream supply chains.

Risk Cluster (Goods)	Commodity Risk	Country Risk	Overall Risk
PPE, Garments & Consumer Industrial Goods	High to Very High	Low	High
Food & Agriculture	High	Low	Medium
Mining, Metals & Industrial Inputs	High	Mostly Low-risk countries with limited high-risk exposure	High
Chemicals, Plastics & Materials	High	Mostly Low-risk countries with limited high-risk exposure	High
Electronics & Electrical Supply Chain	High	Low	High
Logistics & Transport	Medium to High	Mostly Low-risk countries with limited high-risk exposure	Medium
Industrial Services	Medium to High	Low	Medium
Intermediate Industrial & Technical Goods	Medium	Low	Medium

Remediation Measures

Based on the information currently available to the Company through its existing processes, Northern Graphite has not been made aware of, nor identified, any instances of forced labour or child labour within its operations or supply chains.

We recognize that our success is dependent upon partnering with local communities and stakeholders and we use open, honest, dialogue to build relationships while respecting their cultural knowledge and the land in which we occupy. In the event that evidence of forced or child labour is found, we commit to engaging with the local community, stakeholders, and families affected to ensure we remediate any negative impacts.

Awareness Training

All corporate employees are required to take training on company policies inclusive of the Whistleblower policy, Corporate Social Responsibility Policy, Environmental Policy, the Code of Business Conduct and Ethics, and the Health and Safety Policy. In addition to training on corporate policies, employees working on-site are required to take all training on Take 5 Safety, Serious 7, First Aid, Workplace Hazardous Materials Information System, Closed Space, Working at Height, Emergency Action Plan, Lifting and Rigging equipment, Forklifts, Loaders, and Crushers. While we do not currently offer formal dedicated training specific to forced labour and child labour, the training we currently offer will be foundational as we approach this issue in future reporting years.

Progress In 2025

In 2025, Northern Graphite continued to strengthen its governance framework and standards related to Modern Slavery. Building on the progress made in 2024, the Company further advanced the implementation of its Modern Slavery Policy Statement and completed its Annual Sustainability Questionnaire for the second consecutive year.

In addition, Northern Graphite continued to promote awareness of Modern Slavery across the organization through regular toolbox talks and internal presentations to employees, reinforcing understanding of risks and responsibilities throughout the business.

Self-Assessment Process & Requirements

Northern Graphite does not currently have a formal self-assessment process in place to evaluate the effectiveness of its measures to prevent forced labour and child labour within its operations and supply chains. At this stage, the Company is focused on building a foundational understanding of its risk exposure and strengthening internal awareness of modern slavery risks.

While a formal self-assessment framework has not yet been established, Northern Graphite currently reviews supplier-related information through its procurement and evaluation processes, including supplier questionnaires and onboarding documentation. These inputs are considered on a periodic basis by management to support ongoing oversight of supplier relationships and risk exposure.

Conclusion & Key Takeaways

Through its 2025 assessment, Northern Graphite has identified that certain categories of goods and services within its procurement activities carry an elevated inherent risk of forced labour and child labour, particularly in relation to industrial supply chains such as mining inputs, manufacturing-related goods, and materials sourced through complex global supply chains. At the same time, a significant

portion of the Company's spend is concentrated in lower-risk categories, including professional services, administrative services, and energy supply.

Northern Graphite has established a number of foundational measures to support the mitigation of these risks, including its Code of Business Conduct and Ethics, Whistleblower Policy, Human Rights Policy Statement, supplier-related contractual frameworks, internal procurement controls, and supplier engagement tools such as the Supply Evaluation Form, Supplier Pre-Selection Questionnaire, and Annual Sustainability Questionnaire. In addition, the Company supports responsible sourcing and industry collaboration through its membership in organizations such as the Chamber of Mines in Namibia and the Québec Mining Association in Canada. These measures provide a baseline framework aligned with the Company's commitment to ethical business conduct and the prevention of forced labour and child labour within its operations and supply chains.

At this stage, Northern Graphite's approach to modern slavery risk management is focused on building awareness, understanding risk exposure, and strengthening internal processes. The Company recognizes that effective management of forced labour and child labour risks requires an ongoing and evolving due diligence process, and that expectations from regulators, investors, and other stakeholders are increasingly shifting toward more structured, risk-based, and action-oriented frameworks.

Looking ahead, Northern Graphite intends to progressively enhance its approach by further developing internal capabilities and identifying opportunities to implement more structured and risk-based human rights due diligence practices. This includes increasing internal awareness and training, improving visibility over higher-risk supply chain categories, and evaluating options to integrate human rights considerations more systematically into procurement and supplier management processes. As the Company's approach matures, Northern Graphite expects to assess the feasibility of additional measures such as targeted supplier engagement and enhanced due diligence mechanisms, where appropriate.


Northern Graphite acknowledges that it is in the early stages of its modern slavery risk management journey and does not currently have a comprehensive due diligence or monitoring system in place across all operations and supply chains. However, the Company is committed to continuous improvement and to strengthening its policies, processes, and oversight over time in line with evolving regulatory expectations and industry best practices.

At Northern Graphite, we value our people and are committed to maintaining a work environment that respects and safeguards the dignity, rights, and well-being of all employees. This commitment is reflected in our policies, governance framework, and operational practices across all jurisdictions in which we operate. Northern Graphite remains committed to advancing responsible and ethical business practices and to progressively enhancing its efforts to mitigate the risk of forced labour and child labour within its supply chains.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

This report was approved by the Board of Directors of Northern Graphite Corporation on May 31, 2026.

Hugues Jacquemin



Full Name	Signature
CEO	2026-05-31
Title	Date

I have the authority to bind Northern Graphite Corporation, and this report covers financial year 2025 and applies to Northern Graphite Corporation and all entities considered reporting entities in terms of the Act and any controlling subsidiaries of Northern Graphite Corporation if they apply.