

SUBJECT: Procedure for Handling of Complaints – Whistle-Blowing

OBJECTIVE: To provide a procedure by which the process, mandate and responsibilities around handling complaints, whether through the whistle-blowing process or reported otherwise, be documented and approved.

COVERED PERSONS: Lithium Americas Corp. (“LAC”) and its subsidiaries (LAC and subsidiaries (including, for avoidance of doubt, Minera Exar S.A.) collectively referred to as the “Company”)

PROCEDURE

Management:

1. are required to report all complaints, in whatever method received and from whomever initially received, from employees, customers, partners and third party suppliers (the “Reporter(s)”) to the Audit Committee Chairman of LAC in writing within forty-eight (48) hours; and
2. are required to report to the Audit Committee Chairman of LAC any suspected or known instances of fraud and/or misconduct and/or management override they become aware of in the course of conducting their duties.

Audit Committee Chairman:

1. to receive all complaints, in whatever method sent and to whomever initially sent, from Reporter(s);
2. to confer with the CEO of LAC to determine the liaison person for information gathering with respect to any complaint that is non-accounting, non-audit or non-internal control;
3. responsible for administering a Whistle-Blower log (example attached) of complaints or concerns brought directly by a Reporter or reported through any method used by a Reporter. The Whistle-Blower log is to be maintained either by the Audit Committee Chairman or by a third-party service provider under the supervision of the Audit Committee Chairman;
4. responsible for securing the Whistle-Blower log;
5. responsible for coordinating, monitoring and conducting the investigation of complaints;
6. maintain contact or if appropriate, assign someone to maintain contact with the Reporter; and

7. shall retain and maintain in confidential paper files all documentation with respect to an incident including but not limited to e-mail correspondence, notes from telephone calls, interviews, etc.

If a complaint is made with respect to the Audit Committee Chairman, such complaint will be directed to the Chairman of the Board. The Chairman of the Board will be responsible for handling such complaint(s) and, together with the CEO and the President of LAC, for assigning a person to investigate such complaint(s) and report back to the Chairman of the Board. The Chairman of the Board will report the results of investigation of such complains to the Board.

REPORTING PROTOCOL AND NO RETALIATION

The Audit Committee Chairman of LAC is to provide a confidential report to the Audit Committee on a quarterly basis. The report will list all complaints received in the quarter, any unresolved complaints still outstanding from the previous quarters and the steps taken to investigate and conclude each matter.

It is the Company's policy to ensure that concerned persons can communicate freely under this policy and be protected from any form of direct or indirect retaliation, including adverse employment consequences such as discharge, suspension, demotion, harassment or discrimination. Every employee, officer, director or consultant of the Company who legitimately and in good faith submits a complaint will be protected by the Company against any retaliation because of that activity. However, since such allegation of impropriety may result in serious personal repercussions for the target person or entity, the person making the allegations of impropriety should have reasonable grounds before filing a report and should undertake such reporting in good faith, for the best interests of the Company and not for personal gain or motivation. Anyone who retaliates against someone who has filed a report in good faith under this policy may be subject to discipline up to and including termination of employment. Nothing herein shall be construed to protect a person from the consequences of their own wrongdoing; however, a person's self-disclosure of wrongdoing that is not independently discovered through investigation shall be taken into account when considering the consequences to such person.

Please use any of the following options to contact the Audit Committee Chairman of LAC should you have a complaint or concern, including, but not limited to, any complaint or concern relating to a possible breach of the Company's Code of Business Conduct and Ethics:

1. Website: www.lighthouse-services.com/lithiumamericas

2. Toll-Free Telephone:

Direct Dial

- o English speaking USA and Canada: **833-480-0010**
- o Spanish speaking USA and Canada: **800-216-1288**
- o French speaking Canada: **855-725-0002**
- o Spanish speaking Mexico: **01-800-681-5340**

AT&T USADirect

- o **All other countries: 800-603-2869** (must dial country access code first [click here](#) for access codes and dialing instructions)
- 3. E-mail: reports@lighthouse-services.com** (must include company name with report)
 - 4. Fax: 215-689-3885** (must include company name with report)

