

Ecobank Ghana Plc Abrepo-Branch

First National Bank Haper Road Branch

Nicdox Resources Limited - Code of Conduct

Effective Date: 26th May, 2025

Approved by: Executive Management

Review Cycle: Annually

1. Introduction

At Nicdox Resources Limited, our success is built on integrity, professionalism, innovation, and accountability. This Code of Conduct outlines the principles, standards, and expectations that govern how we work, interact with others, and conduct business across all departments and subsidiaries. This Code applies to all employees, contractors, directors, interns, and consultants associated with Nicdox, regardless of location or role.

2. Purpose

- Promote a culture of ethical behavior and compliance.
- Protect Nicdox's reputation and ensure responsible business conduct.
- Provide guidance on expected behavior and help prevent misconduct.
- Ensure compliance with all applicable laws in Ghana and international standards.

3. Core Values

- **Integrity:** We do what is right, even when no one is watching.
- **Excellence:** We pursue the highest standards in our operations and relationships.
- **Safety:** We prioritize the health and well-being of our people and the environment.
- **Respect:** We treat all people with dignity, fairness, and consideration.
- **Accountability:** We take ownership of our actions and deliver on our commitments.
- **Innovation:** We seek sustainable and forward-thinking solutions.

4. Compliance with Laws and Regulations

All employees must comply with:

- The Laws of Ghana, including the Labour Act, 2003 (Act 651); Companies Act, 2019 (Act 992); and the Minerals and Mining Act, 2006 (Act 703).
- Industry-specific regulations such as the Minerals and Mining (Health, Safety and Technical) Regulations, 2012 (L.I. 2182).
- Applicable **international laws** and conventions where Nicdox operates or partners.

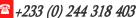
5. Workplace Conduct

a. Respect and Fair Treatment

- Discrimination or harassment based on race, gender, ethnicity, religion, disability, or any protected status is prohibited.
- Maintain a professional and respectful work environment at all times.

b. Violence and Harassment

Any form of physical or verbal abuse, intimidation, or bullying is strictly prohibited.





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Report any incidents immediately to Human Resources or the Ethics Committee.

c. Drugs and Alcohol

• Nicdox maintains a zero-tolerance policy for alcohol, illegal drugs, or substance abuse at the workplace or during work hours.

6. Conflict of Interest

Employees must avoid situations were personal interests' conflict with business responsibilities, including:

- Engaging in activities that compete with Nicdox.
- Using company assets or information for personal gain.
- Hiring or favoring relatives or associates without disclosure and approval

All potential conflicts must be disclosed in writing to HR or senior management.

7. Bribery, Corruption and Gifts

- Bribery and corruption are criminal offenses. Nicdox does not permit the offering, giving, soliciting, or receiving of bribes in any form.
- Employees must not offer or accept gifts, entertainment, or hospitality that may influence business decisions.
- Any gifts received must be reported and approved by the appropriate supervisor.

8. Confidentiality and Data Protection

- Employees must protect confidential information, including client data, company strategies, and intellectual property.
- Disclosure of confidential information to unauthorized persons is strictly prohibited.
- All data handling must comply with Ghana's Data Protection Act, 2012 (Act 843).

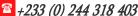
9. Use of Company Resources

- Company assets—including vehicles, machinery, computers, and funds—must be used responsibly and only for authorized purposes.
- Theft, fraud, or misuse of company property will result in disciplinary action, including possible termination and prosecution.

10. Environmental and Social Responsibility

- Employees must act in a way that minimizes harm to the environment and supports the sustainable use of resources.
- All operations must comply with the Environmental Protection Agency Act, 1994 (Act 490).
- We support community engagement and development wherever we operate.

11. Health and Safety





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- Adhere strictly to the company's **Health and Safety Policy**.
- Follow all safety protocols and wear required personal protective equipment (PPE).
- Report hazards, unsafe conditions, and accidents immediately.

12. Reporting Violations and Whistleblowing

Employees are encouraged to report misconduct, unethical behavior, or policy violations through any of the following channels:

- Line Manager or Supervisor
- Human Resources Department
- Ethics and Compliance Office
- Confidential Whistleblower Hotline or Email

Retaliation against whistleblowers is strictly prohibited. Reports will be investigated confidentially and fairly.

13. Disciplinary Action

Violations of this Code may result in disciplinary measures, including:

- Verbal or written warnings
- Suspension or termination of employment
- Legal action, where applicable

All disciplinary actions will be handled in accordance with the Labour Act and company policy.

14. Responsibilities of All Employees

Every employee has a responsibility to:

- Read, understand, and comply with this Code.
- Attend required ethics and conduct training sessions.
- Act promptly when observing unethical behavior.
- Promote a culture of openness and compliance.

15. Management Commitment

Nicdox management is committed to:

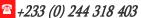
- Upholding the highest ethical standards.
- Leading by example in adherence to this Code.
- Providing resources and training to support compliance.

16. Review and Amendments

This Code of Conduct will be reviewed annually or as needed to reflect legal, operational, or ethical changes. All updates will be communicated company-wide.

Declaration

By being a part of Nicdox Resources Limited, all employees and associates agree to abide by the standards and values outlined in this Code.





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Nana Adu Tutu Poku

CEO, Nicdox Resources Limited

Date: 26th May,2025

NICDOX RESOURCES LTD. P. O. BOX CT III192 CANTONMENTS ACCRA



