

## Nicdox Resources Limited – Code of Conduct

**Effective Date:** 26<sup>th</sup> 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.

- 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 where 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

- 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

Nicdrex 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 Nicdrex Resources Limited, all employees and associates agree to abide by the standards and values outlined in this Code.



**Nana Adu Tutu Poku**

*CEO, Nicdox Resources Limited*

**Date:** 26<sup>th</sup> May, 2025

**NICDOX RESOURCES LTD.  
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Motto: Reliable. Resilient. Resourceful