

Nicdox Resources Limited – Contractor Code of Conduct

Effective Date: 26th May, 2025

Approved by: Executive Management

Applies to: All contractors, subcontractors, vendors, and third-party service providers

1. Introduction

At **Nicdox Resources Limited**, we hold our contractors to the same high ethical, legal, and operational standards as we do our own employees. This **Contractor Code of Conduct** outlines the principles and standards of behavior expected of all contractors, subcontractors, and service providers who engage with our business.

Contractors must comply with this Code at all times when working on Nicdox projects, premises, or representing the company in any capacity.

2. Legal Compliance

Contractors must comply with all applicable local and international laws and regulations, including but not limited to:

- Labour Act, 2003 (Act 651)
- Minerals and Mining Act, 2006 (Act 703)
- Environmental Protection Agency Act, 1994 (Act 490)
- Occupational Health and Safety regulations, including L.I. 2182
- Data Protection Act, 2012 (Act 843)

3. Ethical Business Practices

- **Zero Tolerance for Corruption:** Bribery, kickbacks, or facilitation payments are strictly prohibited. Contractors must not offer, solicit, or accept gifts or payments intended to influence a business decision.
- **Conflict of Interest:** Contractors must avoid situations where personal interests conflict with business dealings with Nicdox. Any potential conflict must be disclosed immediately.
- **Fair Competition:** Contractors must compete fairly and comply with antitrust and competition laws.

4. Labour and Human Rights

Contractors must:

- Treat all workers with dignity and respect.
- Comply with all labour laws, including fair wages, working hours, and employment conditions.
- Prohibit all forms of forced, bonded, or child labor.
- Ensure a workplace free from harassment, abuse, or discrimination.

5. Health and Safety

Contractors are required to:

- Adhere strictly to Nicdox's **Health and Safety Policy**.
- Provide and enforce the use of appropriate **Personal Protective Equipment (PPE)**.
- Conduct risk assessments and implement appropriate control measures.
- Ensure all workers are trained in safety procedures relevant to their duties.
- Report all incidents, accidents, and near-misses immediately to the relevant site manager or safety officer.

Failure to comply with safety protocols will result in immediate suspension of work and possible termination of the contract.

6. Environmental Responsibility

Contractors must:

- Comply with all applicable environmental laws and standards.
- Minimize environmental impact through responsible waste management, emissions control, and use of resources.
- Prevent pollution and report any environmental incidents immediately.

Nicdox expects all contractors to actively support sustainable practices aligned with the **Environmental Protection Agency Act** and the company's environmental policy.

7. Use of Nicdox Property and Assets

- Contractors must use company property (tools, equipment, vehicles, etc.) only for authorized purposes and return them in good condition.
- Unauthorized removal, misuse, or damage to company property will result in disciplinary or legal action.

8. Confidentiality and Data Protection

Contractors must:

- Protect all confidential and proprietary information disclosed during their work.
- Not disclose or use Nicdox's data or intellectual property for personal or third-party benefit.
- Comply with Ghana's **Data Protection Act, 2012 (Act 843)** and any confidentiality agreements signed.

9. Substance Abuse and Workplace Conduct

- Contractors are prohibited from working under the influence of drugs or alcohol.
- Any form of violence, abuse, or misconduct on company sites will result in immediate removal and possible legal action.

10. Communication and Representation

- Contractors must not speak to the media or make public statements on behalf of Nicdox without prior written authorization.

- All contractor personnel must act professionally and always uphold Nicdcox's image and values.

11. Monitoring and Auditing

Nicdcox reserves the right to:

- Audit contractor operations to ensure compliance with this Code.
- Investigate any allegations of misconduct or breach.
- Request documentation or conduct interviews as part of monitoring efforts.

12. Reporting Violations

Contractors and their employees are encouraged to report any violations of this Code through:

- A designated Nicdcox representative
- The **Nicdcox Ethics and Compliance Office**
- A confidential reporting channel (if provided)

Whistleblower protection is guaranteed—no retaliation will be tolerated against those who report in good faith.

13. Breach and Sanctions

Violations of this Code may lead to:

- Immediate termination of contract
- Removal from site
- Legal action or blacklisting from future Nicdcox projects

Contractors are fully responsible for the behavior of their employees, agents, and subcontractors.

14. Acknowledgment and Acceptance

By entering into a contract with Nicdcox Resources Limited, contractors confirm their commitment to abide by this **Contractor Code of Conduct** and ensure that all their personnel and subcontractors are aware of and adhere to its contents.



Nana Adu Tutu Poku

CEO, Nicdcox Resources Limited

Date: 26th May, 2025

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