

Nicdox Resources Limited – Duty of Care Policy

Effective Date: 26th May, 2025

Approved by: Executive Management

Applies to: All employees, contractors, subcontractors, consultants, temporary workers, and visitors

Reviewed: Annually or as necessary

1. Policy Statement

At Nicdox Resources Limited, we are fully committed to providing a safe, secure, healthy, and respectful working environment for all individuals who engage with our company. Our **duty of care** obligates us to take all reasonable measures to prevent harm, protect human life and dignity, and ensure wellbeing in all our operational environments. This policy outlines our responsibilities and expectations regarding the health, safety, welfare, and conduct of all personnel.

2. Objectives

This policy aims to:

- Establish and uphold a safe working environment at all Nicdox sites
- Promote the mental and physical wellbeing of all employees and contractors
- Prevent occupational injuries, diseases, and work-related stress
- Ensure that all employees understand their individual and collective duty of care
- Foster a culture of responsibility, accountability, and proactive risk management

3. Scope

This policy applies to:

- All Nicdox operational sites (head offices, project sites, mobile units, workshops, etc.)
- All persons working for or representing Nicdox
- Visitors, suppliers, and third-party contractors while on company premises

4. Legal and Regulatory Compliance

Nicdox shall comply with:

- The **Labour Act, 2003 (Act 651)**
- The **Factories, Offices and Shops Act, 1970 (Act 328)**
- The **Environmental Protection Agency Act, 1994 (Act 490)**
- **International Labour Organization (ILO)** conventions ratified by Ghana
- Other applicable industry-specific safety regulations and codes of practice

5. Core Principles of Duty of Care

a) Health and Safety

- Provide and maintain safe systems of work, safe equipment, and protective infrastructure
- Conduct regular risk assessments and safety audits
- Ensure access to personal protective equipment (PPE) and emergency response tools

b) Wellbeing and Mental Health

- Support a culture of mental wellness through awareness, stress management programs, and counselling access
- Prevent workplace bullying, harassment, and discrimination

c) Training and Awareness

- Provide all staff and contractors with training on workplace safety, emergency procedures, and incident reporting
- Maintain regular refreshers and competency-based evaluations

d) Emergency Preparedness

- Develop and test emergency response and evacuation procedures
- Equip all sites with appropriate first aid, firefighting, and communication tools

e) Safe Travel and Security

- Assess and manage travel risks for employees on assignment
- Provide transportation, security briefings, and protocols for remote or high-risk locations

f) Community Protection

- Ensure our activities do not endanger or negatively impact nearby communities
- Maintain open communication with local stakeholders about potential hazards or disruptions

6. Responsibilities

Role	Duty
Executive Management	Provide leadership, resources, and strategic oversight
HSE Department	Develop and implement HSE programs, monitor compliance, and report risks
Supervisors and Managers	Enforce policy adherence, provide on-the-job guidance and feedback
Employees and Contractors	Follow all safety procedures and report unsafe conditions immediately
Visitors	Comply with site-specific safety rules and follow escort instructions

7. Reporting and Incident Management

- All incidents, hazards, or near misses must be reported immediately to the supervisor or HSE representative
- A full investigation will be conducted and remedial actions taken to prevent recurrence
- Whistleblowers reporting unsafe behavior in good faith will be protected from retaliation

8. Monitoring and Review

- The Duty of Care Policy will be reviewed annually or after major incidents, project expansions, or legal changes
- Key performance indicators (KPIs) will be used to track safety and wellbeing performance

- External audits may be commissioned to ensure continued compliance

9. Communication and Awareness

- This policy will be shared during onboarding, displayed at all Nicdox facilities, and published on the company website
- Regular safety briefings and toolbox meetings will reinforce awareness of duty of care obligations

10. Non-Compliance

Failure to comply with this policy may result in:

- Disciplinary action, including termination of employment or contract
- Suspension of site access
- Legal liability for negligent or reckless actions



Nana Adu Tutu Poku

CEO, Nicdox Resources Limited

Date: 26th May, 2025

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