

## Nicdox Resources Limited – Gift, Hospitality, and Sponsorship Policy

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

**Approved by:** Executive Management

**Applies to:** All employees, directors, officers, contractors, consultants, and third-party representatives

**Review Cycle:** Annually or as needed

### 1. Policy Statement

Nicdox Resources Limited is committed to conducting its business with integrity and in compliance with all applicable laws, including Ghana's **Criminal Offences Act, 1960 (Act 29)** and the **Public Procurement Act, 2003 (Act 663)**. We prohibit the offering or receiving of gifts, hospitality, or sponsorships that may influence business decisions or create actual or perceived conflicts of interest.

This policy ensures that gifts, hospitality, and sponsorships are handled transparently, ethically, and in a manner that does not compromise the reputation or operations of the company.

### 2. Purpose

The purpose of this policy is to:

- Prevent bribery, corruption, and undue influence in business decisions
- Provide clear guidance to employees and third parties on what is acceptable
- Protect the company's reputation and ensure compliance with legal obligations
- Promote transparency, fairness, and accountability

### 3. Scope

This policy applies to:

- All Nicdox employees, managers, and executives
- Contractors, vendors, suppliers, and consultants
- Any third parties acting on behalf of Nicdox

### 4. Definitions

- **Gift:** Any item or service of value (e.g., cash, goods, gift cards, discounts, tickets) offered or received without a reciprocal exchange.
- **Hospitality:** Meals, accommodations, travel, or entertainment provided to or by external parties.
- **Sponsorship:** Financial or in-kind support provided to events, individuals, or organizations, often for publicity or community engagement purposes.

### 5. General Rules

Action	Allowed?	Conditions
Giving/receiving nominal gifts	Yes	Must be modest ( $\leq$ GHS [insert value]), infrequent, and not tied to any decision
Business hospitality	Yes	Must be reasonable, for legitimate business, and pre-approved

Cash or cash equivalents	No	Strictly prohibited
Lavish or frequent hospitality	No	Not allowed as it may influence judgment
Political donations	No	Prohibited under company policy
Charitable sponsorships	Yes (case-by-case)	Must be approved, documented, and not a front for bribery

## 6. Gift and Hospitality Limits

Type	Limit	Approval Required
Gifts received	≤ GHS [e.g., 500]	Supervisor notification recommended
Gifts above limit	> GHS [e.g., 500]	Written approval from Compliance Officer or HR
Meals/entertainment	Reasonable and infrequent	Pre-approval required for high-value hospitality
Travel/accommodation	Must be business-related	Must be pre-approved

*Note: "Reasonable" means not extravagant and aligned with local market norms.*

## 7. Sponsorships

All sponsorship activities—either given or received—must:

- Align with Nicdox's values, CSR goals, and reputation
- Be approved in writing by Executive Management
- Be transparent and properly documented
- Not be used as a disguised form of bribery or favoritism

Examples of acceptable sponsorships:

- Community health and education programs
- Local infrastructure development
- Responsible mining education campaigns
- Youth training or skills development initiatives

## 8. Prohibited Practices

The following are strictly **prohibited**:

- Offering or accepting gifts or hospitality to gain an unfair business advantage
- Accepting gifts during tender or procurement processes
- Giving gifts or sponsorships to public officials to influence decisions
- Failing to declare gifts or sponsorships that may pose a conflict of interest
- Using personal funds to circumvent policy restrictions

## 9. Disclosure and Reporting

All employees must **immediately report** any gift, hospitality, or sponsorship that:

- Exceeds the allowed threshold
- Could be perceived as inappropriate or compromising

- Was not solicited but may influence judgment

Disclosures should be made to:

- Line Manager
- Human Resources Department
- Compliance Officer

A **Gift and Hospitality Register** will be maintained to log all declared activities.

## 10. Monitoring and Enforcement

- The Compliance Officer and HR Department will regularly audit gift, hospitality, and sponsorship records.
- Violations of this policy may lead to disciplinary action, including termination of employment or contracts.
- In serious cases, breaches may be referred to law enforcement agencies.

## 11. Roles and Responsibilities

Role	Responsibility
Employees/Contractors	Comply with the policy and disclose relevant activities
Line Managers	Provide guidance and escalate concerns
HR and Compliance Team	Approve, monitor, and maintain the gift and sponsorship register
Executive Management	Approve high-level sponsorships and oversee policy enforcement

## 12. Policy Review

This policy will be reviewed annually or whenever significant changes occur in the law or company operations. Updates will be communicated company-wide.



**Nana Adu Tutu Poku**

*CEO, Nicdox Resources Limited*

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

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