

## Nicdox Resources Limited – Grievance Procedure

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

**Approved by:** Executive Management

**Applies to:** All employees, contractors, interns, and third-party service providers

**Reviewed:** Annually or as necessary

### 1. Purpose

Nicdox Resources Limited is committed to maintaining a positive work environment where all individuals feel respected and valued. This **Grievance Procedure** provides a structured and confidential process for employees, contractors, and stakeholders to raise complaints, concerns, or disputes relating to work, management, conduct, or company operations.

### 2. Scope

This procedure applies to grievances related to:

- Working conditions and environment
- Interpersonal conflict or harassment
- Bullying, discrimination, or victimization
- Breach of company policies
- Health and safety concerns
- Terms and conditions of employment
- Misconduct or unethical behavior by management or colleagues

### 3. Guiding Principles

Nicdox's grievance resolution process is guided by the following principles:

- **Fairness:** Every grievance will be handled impartially and objectively.
- **Confidentiality:** All grievances will be treated confidentially and only shared on a need-to-know basis.
- **Timeliness:** Grievances will be addressed and resolved as quickly as possible.
- **Non-Retaliation:** Individuals raising grievances in good faith will be protected from victimization.
- **Accessibility:** All staff and contractors have access to the grievance procedure without fear or discrimination.

### 4. Grievance Procedure Stages

#### Stage 1: Informal Resolution

- Employees or contractors are encouraged to resolve minor grievances informally by discussing the issue directly with the person involved or their immediate supervisor.
- Many issues can be quickly resolved through open communication without the need for a formal process.

If the issue is not resolved, or if the individual does not feel comfortable raising it informally:

## Stage 2: Formal Grievance Submission

- The grievance should be submitted **in writing** to the **HR Department** or **Grievance Officer**.
- The written complaint should include:
  - Name and contact information
  - Date of grievance
  - Description of the issue (including people involved, location, and timeline)
  - Any previous efforts made to resolve it
  - Desired outcome or resolution

A grievance form may be provided by HR to standardize the submission.

## Stage 3: Acknowledgment and Investigation

- The grievance will be **acknowledged in writing** within **3 working days**.
- An impartial **investigation** will begin within **7 working days**, led by HR or a designated internal panel.
- Witnesses may be interviewed, and supporting documents reviewed.
- The complainant and the subject of the grievance will be allowed to present their side of the matter.

## Stage 4: Decision and Resolution

- A formal decision and proposed resolution will be communicated in writing within **10–15 working days** of starting the investigation.
- If the grievance is upheld, corrective action will be taken, which may include mediation, disciplinary action, or policy changes.
- If the grievance is not upheld, a reasoned explanation will be provided.

## Stage 5: Appeal

- If the complainant is dissatisfied with the outcome, they may file an **appeal** within **5 working days** of the decision.
- The appeal must be in writing, stating reasons and any new evidence.
- A senior manager or appeal panel not involved in the original decision will review the case.
- A final decision will be issued within **10 working days**, and this decision is binding.

## 5. Special Considerations

- **Harassment or Bullying:** Grievances involving harassment will be treated with urgency and sensitivity. The accused may be temporarily removed from duty pending investigation.
- **Anonymous Grievances:** While anonymity may limit investigation effectiveness, Nicdox will still take reasonable action if sufficient detail is provided.
- **Group Grievances:** Where several individuals are affected, a collective grievance may be submitted, and a representative may act on behalf of the group.

## 6. Recordkeeping

- All grievance records will be maintained in a secure and confidential manner for a **minimum of 5 years**.
- Records will include the grievance, investigation notes, outcome, and any corrective action taken.

## 7. Responsibilities

Role	Responsibility
Employee/Contractor	Raise grievances in good faith and provide full details.
Supervisor/Manager	Attempt informal resolution and escalate when needed.
HR Department	Coordinate grievance handling, investigations, and documentation.
Appeal Panel/Executives	Review escalated cases and make final decisions.

## 8. Policy Review

This procedure will be reviewed annually by HR and management to ensure its continued relevance and compliance with Ghanaian law and company values.

## 9. Communication and Accessibility

The Grievance Procedure will be:

- Published on the Nicdox website and intranet.
- Included in employee and contractor handbooks.
- Explained during onboarding and orientation sessions.



**Nana Adu Tutu Poku**

*CEO, Nicdox Resources Limited*

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

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