

Nicdox Resources Limited – Human Rights Policy

Effective Date: 26th May, 2025

Approved by: Executive Management

Applies to: All employees, contractors, suppliers, and third-party stakeholders

Review Frequency: Annually or as required

1. Policy Statement

Nicdox Resources Limited is committed to respecting and upholding the fundamental human rights of all individuals affected by our operations. We believe in the inherent dignity of every person and recognize our responsibility to ensure that our business practices do not contribute to human rights abuses.

We adhere to the principles enshrined in:

- The **1992 Constitution of the Republic of Ghana**
- The **Labour Act, 2003 (Act 651)**
- The **United Nations Universal Declaration of Human Rights**
- The **International Labour Organization (ILO) Conventions**
- The **United Nations Guiding Principles on Business and Human Rights (UNGPs)**

2. Purpose

This policy provides a framework for Nicdox to:

- Promote and protect human rights within our sphere of influence
- Prevent, identify, and address human rights risks and violations
- Guide ethical business conduct and responsible decision-making
- Demonstrate leadership in sustainable and socially responsible development

3. Scope

This policy applies to:

- All **Nicdox employees**, regardless of role or location
- **Contractors, consultants, suppliers**, and any third parties acting on behalf of Nicdox
- All operations, project sites, and partnerships, including community and governmental engagements

4. Core Human Rights Commitments

Nicdox is committed to the following key human rights principles:

4.1. Non-Discrimination and Equal Opportunity

We provide a workplace free from discrimination based on race, gender, age, religion, ethnicity, disability, sexual orientation, political affiliation, or any other status protected by law. All employment decisions are based on merit, qualifications, and business needs.

4.2. Prohibition of Forced and Child Labour

We do not engage in, support, or tolerate any form of forced labour, human trafficking, or child labour. We comply with the minimum age requirements as outlined in Ghanaian law and international conventions.

4.3. Safe and Healthy Working Conditions

We uphold every worker's right to a safe and healthy working environment and are committed to providing adequate training, equipment, and procedures to ensure occupational safety and health.

4.4. Freedom of Association and Collective Bargaining

We respect the rights of workers to freely associate, join trade unions, and engage in collective bargaining in accordance with Ghanaian labour law.

4.5. Fair Wages and Working Hours

We pay fair wages that meet or exceed legal requirements and industry standards. We ensure working hours comply with national laws and international standards, including the right to rest, leave, and compensation for overtime.

4.6. Right to Privacy and Dignity

We respect the privacy of our employees and stakeholders and protect personal data in accordance with Ghana's Data Protection Act (Act 843) and global best practices.

4.7. Land, Water, and Community Rights

We recognize the rights of local communities to land, water, and natural resources and are committed to engaging them respectfully and transparently in any activity that affects their lives or environment.

5. Human Rights Due Diligence

Nicdrex integrates human rights due diligence into its business processes, including:

- Identifying actual and potential human rights risks
- Assessing the impact of our operations on stakeholders
- Taking proactive steps to prevent, mitigate, and remedy abuses
- Monitoring and reporting on human rights performance

6. Grievance Mechanism

We provide accessible and transparent channels for employees, contractors, and community members to raise concerns or report human rights violations without fear of retaliation. All grievances are treated seriously and resolved fairly and promptly.

(Refer to the Nicdrex Grievance Procedure for detailed process.)

7. Responsibilities

Role	Responsibility
Employees	Understand and uphold this policy in daily operations
Supervisors/Managers	Monitor compliance and ensure proper training
Human Resources	Provide education and handle complaints related to employee rights
Community Relations	Engage local communities with respect and transparency

Executive Management Lead by example and ensure company-wide accountability

8. Training and Awareness

Nicdcox will provide regular training to staff, management, and relevant third parties on human rights, including:

- Workplace conduct and harassment prevention
- Labour rights and diversity awareness
- Conflict-sensitive community engagement

9. Monitoring and Review

This policy will be reviewed annually to ensure it remains relevant and effective. Updates will reflect changes in national law, international standards, and operational realities.

10. Reporting Violations

Anyone who suspects or witnesses a human rights violation related to Nicdcox operations is encouraged to report it via:

- **HR Office**
- **Community Liaison Officer**
- **Anonymous Whistleblower Channel** (details provided internally)

Reports will be investigated confidentially and remedial action taken as necessary.



Nana Adu Tutu Poku

CEO, Nicdcox Resources Limited

Date: 26th May, 2025

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