

NIDECKI RESOURCES LIMITED

CODE OF CONDUCT

1. Purpose

This Code of Conduct sets the behavioural, ethical, and professional standards expected of all employees of Nidecki Resources Limited. It ensures that our operations across logistics, mining, construction, agriculture, and infrastructure sectors are conducted safely, responsibly, and with integrity.

It applies to **all employees**, including managers, supervisors, machine operators, mechanics, truck drivers, and support staff.

2. Our Core Values

- **Integrity** — We act honestly and transparently in all dealings.
- **Safety First** — We prioritise the wellbeing of employees, clients, and communities.
- **Accountability** — We take responsibility for our actions and decisions.
- **Respect** — We treat colleagues, clients, and partners with dignity.
- **Operational Excellence** — We deliver reliable, efficient, and high-quality services.

3. Compliance With Laws and Regulations

All employees must:

- Comply with **Zambian laws**, industry regulations, and cross-border transport requirements.
- Follow company policies on safety, anti-corruption, labour practices, and environmental protection.
- Cooperate fully with audits, inspections, and investigations.

4. Health, Safety, and Environmental Responsibility

Safety is non-negotiable.

Employees must:

- Follow all safety procedures, PPE requirements, and equipment operating standards.
- Report hazards, incidents, and near misses immediately.

- Never operate machinery or vehicles under the influence of alcohol, drugs, or fatigue.
- Protect the environment by preventing spills, emissions, and improper waste disposal.
- Ensure equipment such as excavators, loaders, crushers, and trucks are maintained and operated safely.

Supervisors and managers must:

- Enforce safety rules consistently.
- Conduct toolbox talks, risk assessments, and safety briefings.
- Ensure all operators and mechanics are competent and certified where required.

5. Professional Conduct and Workplace Behaviour

All employees must:

- Treat colleagues and clients with respect and professionalism.
- Avoid harassment, bullying, discrimination, or abusive behaviour.
- Maintain discipline, punctuality, and reliability.
- Use company property responsibly and only for authorised purposes.
- Dress appropriately for their role and work environment.

Managers must:

- Lead by example.
- Promote a culture of fairness, inclusion, and accountability.

6. Anti-Corruption and Ethical Business Practices

Nidecki Resources Limited maintains a zero-tolerance stance on corruption.

Employees must not:

- Offer, accept, or solicit bribes, kickbacks, or improper payments.
- Manipulate procurement, transport schedules, or equipment allocation for personal gain.
- Engage in fraudulent activities, theft, or misrepresentation.

All financial transactions and documentation must be accurate, complete, and truthful.

7. Protection of Company Assets and Information

Employees must:

- Safeguard company equipment, tools, vehicles, and inventory.
- Prevent misuse, theft, or damage to company property.
- Protect confidential information, including client data, operational plans, and pricing.
- Use communication systems responsibly and professionally.

8. Responsible Use of Equipment and Vehicles

Machine operators, mechanics, and truck drivers must:

- Operate equipment only when authorised and trained.
- Conduct pre-shift inspections and report defects immediately.
- Follow load limits, speed restrictions, and route instructions.
- Avoid reckless driving, overloading, or unsafe manoeuvres.
- Ensure refrigerated trailers, open-body trailers, and earthmoving equipment are used correctly.

Mechanics must:

- Perform repairs and maintenance to professional standards.
- Report safety-critical defects without delay.

9. Conflict of Interest

Employees must avoid situations where personal interests conflict with company interests, including:

- Undisclosed business relationships with suppliers or clients.
- Using company resources for personal business.
- Favouritism in hiring, procurement, or operational decisions.

Any potential conflict must be declared to management.

10. Alcohol, Drugs, and Fitness for Duty

Employees must:

- Report to work sober, alert, and fit for duty.

- Refrain from alcohol or drug use during working hours or while operating equipment.
- Inform supervisors if taking medication that may impair performance.

11. Reporting Misconduct

Employees are encouraged to report:

- Safety violations
- Fraud or theft
- Harassment or discrimination
- Corruption or unethical behaviour
- Equipment misuse or sabotage

Reports may be made to supervisors, HR, or through designated confidential channels. Retaliation against whistleblowers is strictly prohibited.

12. Disciplinary Action

Violations of this Code may result in:

- Verbal or written warnings
- Suspension
- Termination
- Legal action where applicable

Disciplinary measures will be applied fairly and consistently.

13. Commitment to Continuous Improvement

Nidecki Resources Limited is committed to:

- Regularly reviewing and updating this Code of Conduct.
- Providing ongoing training on ethics, safety, and compliance.
- Ensuring all employees understand and uphold these standards.