



Supplier Code of Conduct

Nico Resources Ltd (Nico or the Company) strives to achieve sustainability credentials that have positive long-term social, environmental, and economic outcomes for our key stakeholders and the wider community. Those businesses working for and on behalf of the Company, including consultants and contractors, to provide goods and services to our activities (collectively referred to as Suppliers) are a significant component of our business and brand. This Supplier Code of Conduct (Code) ensures our Suppliers align with our culture, values, and policies with the objective of positively impacting our reputation and achieving our sustainability strategy.

Alignment with our values and culture

The Australian acronym RIPPER, meaning awesome, brilliant, excellent, is used to describe our Wingellina Project and the people that work diligently every day to seek to make a positive difference to all our stakeholders. Nico expects our Suppliers to provide a work environment and culture that aligns with our values:

Respect – We are responsible and respect one another, are dedicated to safety and care for the environment and the people in areas in which we operate.

Integrity – We behave with the highest levels of integrity in all that we do, and this is fundamental to who we are and how we operate.

Passion – We are passionate about our people, in the work that we do, and in our goal of making a positive difference to all stakeholders.

Pride – We take pride in every aspect of the work we do and the positive impact it has on all stakeholders.

Energy – We constantly stretch our thinking, take responsibility for making positive things happen and have fun while doing so.

Reputation – We build and strengthen our reputation through trust in alignment with our promises and actions.

Alignment with our policies and other requirements

Nico expects Suppliers to comply with all laws and regulations in the country where the respective Supplier operates, the principles of the United Nations Global Compact, as well as Nico's policies and associated documentation (and as and when amended).

In so doing, Suppliers should have systems and processes within their organisations to support compliance and that has a cycle of continuous improvement.

Schedule 1 summarises Nico's minimum requirements (business integrity, labour and human rights, community, health and safety, environment and climate change, and information security) of its Suppliers with reference to Nico policies.

Training and awareness

Nico expects its Suppliers to demonstrate how they have trained and made their respective teams aware of the requirements described in this document.

Compliance

Nico expects Suppliers to comply with or exceed the requirements described in this Supplier Code of Conduct and our policies.

Non-compliance by the Supplier with Nico's Supplier Code of Conduct will be regarded as a serious violation of the contractual obligations towards Nico. Suppliers should make Nico aware of any non-compliances with this Supplier Code of Conduct by reporting directly to the Nico representative or via Nico's whistleblower procedure (see Whistleblower Policy on Nico's website).

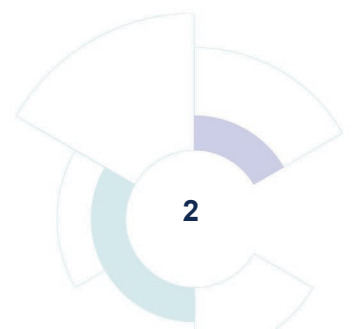
If a Supplier is suspected of violating any of Nico's policies and/or the requirements in this Supplier Code of Conduct, then Nico reserves the right to request from the Supplier that all relevant information be disclosed. Nico reserves the right to end any business with suppliers that are in clear, verifiable violation of this Supplier Code of Conduct and/or who are not implementing improvement measures to improve their sustainability performance and correct identified non-compliances as identified by the Company. Depending on the nature of the violation, there may also be further ramifications, which Nico may wish to exercise.

Reporting

Nico may request evidence from the Supplier to demonstrate how they are meeting the above requirements. Suppliers may be asked by Nico or voluntarily complete a self-assessment of their compliance with this Code of Conduct no more than once per year.



Jonathan Shellabear
MANAGING DIRECTOR
30 June 2024



Schedule 1: Minimum requirements

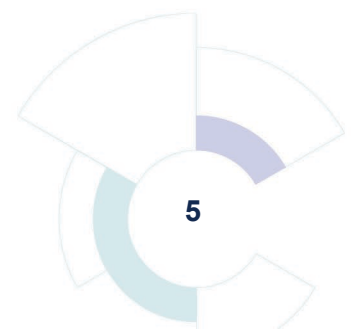
BUSINESS INTEGRITY		
Aspect	Minimum requirements	Policy
Conduct	Nico is committed to conducting business with its Suppliers in an ethical and responsible manner and in compliance with all applicable laws and regulations. Suppliers must act honestly, with high standards of personal integrity and ethically, act in the best interests of Nico.	
Conflicts of interest	Suppliers must avoid entering into any arrangement or participating in any activity that would conflict with the Company's best interests or would be likely to negatively affect the Company's reputation. Any actual, perceived, or possible conflict of interest must be disclosed to the Company.	
Anti-bribery and - corruption	Nico prohibits corruption in all its forms, including extortion and bribery, by its Suppliers. In doing so, Nico expects its Suppliers to comply with all United Nations (UN) and Organisation for Economic Co-operation and Development (OECD) conventions against corruption, and with all governing anti-corruptions laws of the country in which it is operating. Suppliers must not influence Nico employees to gain unfair advantage in any business transactions.	Code of Conduct Anti-bribery and Corruption Policy
Gifts, hospitality, and other benefits	The Supplier must not offer any gifts, entertainment or any benefits that may influence or be construed as influencing a business decision of Nico employees, subcontractors or any other person working for or on behalf of Nico and in doing so comply with applicable anti-bribery and corruption laws and regulations. Any gifts to Nico employees or related parties, if any, must be of low financial value (<AUS\$500) and reflect local business custom. The Supplier must not make or allow facilitation payments to government officials within Australia or internationally when undertaking work for or on behalf of Nico.	
Trade	The Supplier must comply with all international trade laws and sanctions of the countries in which it operates.	

BUSINESS INTEGRITY		
Aspect	Minimum requirements	Policy
Money laundering	The Supplier must not participate in any money laundering activities. The Supplier must comply with laws and regulations for the prevention of money laundering activities.	
Unrestricted competition	Nico expects our suppliers to comply with applicable antitrust laws and regulations. We expect our Suppliers to compete fairly, not to enter into agreements with competitors that might constitute a breach of antitrust law, and not take advantage of their dominance in the marketplace.	

LABOUR AND HUMAN RIGHTS		
Aspect	Minimum requirement	Policy
Fundamental rights and labour standards	Nico expects its Suppliers to treat its employees with respect, in a fair and equitable manner, and ensure the fundamental principles and rights of the International Labor Organization (ILO) and other relevant international human rights standards are enforced while taking account of the applicable laws and regulations of the respective country.	
Child labour	Suppliers and third parties must prohibit child labour of any kind.	
Forced labour	Suppliers must prohibit any form of forced and compulsory labour.	Human Rights Policy
Human rights abuses	Suppliers must not be complicit in human rights abuses.	Diversity Policy
Freedom of association	Suppliers shall respect the right of their employees to form a workers representative group or collective bargaining unit in accordance with applicable laws and regulations of that country.	Code of Conduct
Diversity and inclusivity	The Supplier shall support inclusion at all levels, while maintaining a commitment to high performance. Every employee and subcontractor are treated fairly and respectfully regardless of gender, culture, disability, or other diversity factors.	

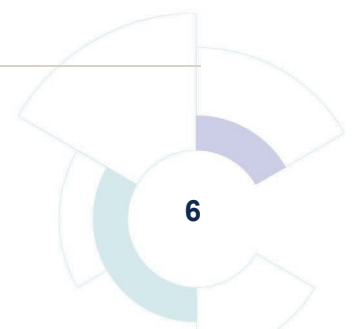
LABOUR AND HUMAN RIGHTS		
Aspect	Minimum requirement	Policy
	<p>Equal opportunity is provided to all employees.</p> <p>The Supplier shall maintain structured and transparent recruitment, selection, and advancement procedures, to ensure that a diverse range of candidates are considered for all roles.</p> <p>The workplace is inclusive and free from unlawful discrimination, bullying, victimisation and vilification, sexual harassment, or workplace harassment.</p>	
Labour conditions	<p>Suppliers shall ensure the work hours for employees comply with relevant labour laws and regulations of the country in which they operate.</p> <p>Suppliers shall ensure their employees receive remuneration that is consistent with the applicable country.</p> <p>Suppliers shall adopt flexible work practices (where possible) to accommodate Personnel with diverse needs, including family responsibilities.</p>	
Grievance mechanisms	<p>Suppliers shall have grievance mechanisms in place for its employees, contractors, and external stakeholders, and have fair and equitable processes in place to address the respective grievance, maintaining confidentiality while protecting the person from any form of discrimination because of lodging the complaint.</p>	

COMMUNITY		
Aspect	Minimum requirement	Policy
Indigenous rights	<p>The Supplier shall respect the rights and roles of indigenous people in accordance with Agreements, Access Permits, and the United Nations Declaration of the Rights of Indigenous Peoples.</p>	Traditional Owner Engagement Policy
Employment and contract opportunities	<p>The Supplier shall promote socio-economic benefits including employment and contractor opportunities for Indigenous people for services on facilities under Nico's operational control.</p>	



COMMUNITY		
Aspect	Minimum requirement	Policy
	The Supplier shall implement a "Traditional Owner first or hire local" program for the awarding of contracts and the employment of project-based personnel.	
Cultural heritage	Activities shall be conducted in a culturally appropriate and sensitive manner.	
Local content	Suppliers who operate in Australia are expected to: <ul style="list-style-type: none"> • Employ Australian citizens; • Engage Australian contractor; and • Preferably and where possible, employment and contractor opportunities from local communities where they are conducting their activities. 	

HEALTH AND SAFETY		
Aspect	Minimum requirement	Policy
Health and safety	<p>Workplace health and safety is one of our highest priorities and we are committed to preventing harm through effective policies, good practices, and continuous improvement programs. Suppliers play a key role in the operations of our facilities and as a result, our policies, systems and processes, and culture apply to both employees and Suppliers equally. All Suppliers are expected to meet the requirements of our <i>Health and Safety Specifications for Contractors</i> as a minimum including but not limited to:</p> <ul style="list-style-type: none"> • Provision of a safe and healthy workplace. • Use of a consultative and risk-based approach to hazard identification and management. • Implementing systems and procedures and a continual improvement approach to prevent workplace injuries. • Providing workers with regular health and safety training relevant to the nature of work, risks and control measures. 	Work Health and Safety Policy

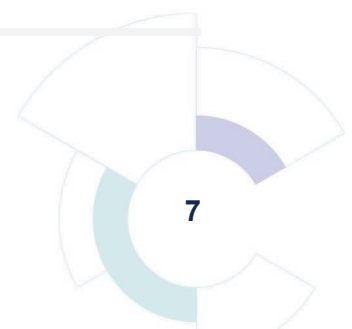


HEALTH AND SAFETY

Aspect	Minimum requirement	Policy
	<ul style="list-style-type: none"> Ensuring workers are fit for work. Ensure Safety-in-Design principles and statutory requirements are embedded in the design and construction procedures and processes, to mitigate construction, operational and maintenance risks. Empowering workers to stop work if they feel the work activities is unsafe. Have emergency response planning and preparedness in place. 	

ENVIRONMENT AND CLIMATE CHANGE

Aspect	Minimum requirement	Policy
Environmental stewardship	The Supplier shall use a risk management approach to ensure mitigation measures are implemented to protect the surrounding environment. The Supplier shall have systems and procedures to demonstrate continual improvement of their environmental performance.	
Water	The Supplier shall implement water efficiency programs, where possible.	
Biodiversity	The Supplier shall implement initiatives to avoid and where this is not possible to minimise impacts to biodiversity, where possible.	Environmental Policy
Waste	The supplier shall implement a waste mitigation hierarchy to avoid, recover and recover (reuse or recycle) waste, where possible.	Greenhouse Gas Environmental Management Plan
Energy efficiency	The Supplier shall implement energy efficiency initiatives.	
Greenhouse gas emissions	Suppliers that operate on Nico tenements are expected to align with or exceed Nico's decarbonisation strategy by increasing their reliance on renewable energy and electrification.	



ENVIRONMENT AND CLIMATE CHANGE		
Aspect	Minimum requirement	Policy
	Suppliers shall cooperate with monitoring and reporting obligations of its greenhouse gas emissions when operating in facilities under the operational control of Nico.	

INFORMATION SECURITY		
Aspect	Minimum requirement	Policy
Cybersecurity	Suppliers must manage cyber risks, data and Confidential Information and Personal Information protection in line with good industry practice.	
Disclosure of information	Suppliers must maintain and protect and not disclose 'Material' or 'Market Sensitive' information concerning the Company prior to it being released to the Australian Securities Exchange (ASX).	Code of Conduct Continuous Disclosure Policy Shareholder Communication Policy
Social media	Suppliers should only share or repost approved, legal content that has already been distributed on Nico's social media platforms. Only information classed as 'public' or is in the public domain is permitted to be shared on social media.	

