

NICO RESOURCES LIMITED

ACN 649 817 425

Diversity Policy

1. INTRODUCTION

1.1 Background

NICO Resources Limited ACN 649 817 425 (**Company**) acknowledges the commercial benefits that can flow from embracing diversity and recruiting directors, officers and employees (**Personnel**) with diverse backgrounds, skills and worldviews. The Company recognizes that fostering a diverse workforce is likely to:

- (a) assist in attracting and retaining first-class Personnel;
- (b) promote innovation throughout the Company; and
- (c) maintain a positive reputation for the Company.

The Company recognises that diversity extends beyond gender and includes, but is not limited to, differences that relate to age, physical and mental disability, marital or family status, religious or cultural background, sexual orientation and gender identity.

1.2 Application

This Diversity Policy (**Policy**) applies to the board of directors of the Company (**Board**) as a whole and all Personnel individually. This Policy does not form part of any Personnel's contract of employment or other agreement with the Company.

The Company, Board and Personnel must not rely on this Policy to defend conduct that does not comply with any applicable anti-discrimination law.

1.3 Policy objectives

The Board has established this Policy to:

- (a) recognize that diversity and inclusivity contribute to corporate success;
- (b) promote a Company culture that upholds diversity, inclusivity and equality;
- (c) ensure the Company fosters a safe, fair and respectful working environment for all Personnel; and
- (d) ensure the Company provides and maintains equal employment opportunities for all Personnel and candidates for Board appointment or employment with the Company;

2. DIVERSITY PRINCIPLES

2.1 Company commitments

The Company is committed to maintaining a culture that embraces inclusivity, diversity and equal opportunity. As part of this commitment, the Company will not tolerate discrimination, bullying, harassment, vilification and victimization in any form from any Personnel.

Without limiting the Company's general commitment to diversity, the Company will endeavour to ensure that the Company:

- (a) supports inclusion at all levels, while maintaining a commitment to high performance;

- (b) maintains structured and transparent recruitment, selection and advancement procedures, to ensure that a diverse range of candidates are considered for all roles;
- (c) does not allow potentially discriminatory conscious or unconscious bias to impact the Company's recruitment, selection and advancement decisions;
- (d) implements appropriate training, programs and procedures that will assist in the development of a broad pool of skilled and experienced Personnel; and
- (e) where appropriate, adopts flexible work practices to accommodate Personnel with diverse needs, including family responsibilities.

2.2 Board Responsibilities

The Board is responsible for leading the promotion of diversity and inclusivity throughout the Company and implementing, managing and reviewing this Policy.

The Board will, at the appropriate time and subject to the Company's size and operations, endeavour to, on an annual basis, establish appropriate and measurable diversity targets (**Measurable Objectives**) to achieve and maintain gender diversity in the Company. At least annually, the Board will evaluate the Measurable Objectives and the Company's progress in realising them.

2.3 Personnel Responsibilities

All Personnel are individually responsible for supporting the Company's commitment to diversity and must act in accordance with the Policy objectives and Company commitments set out in this Policy. Without limiting this responsibility, Personnel must not engage in any form of discrimination, bullying, harassment, vilification and victimization against other Personnel, shareholders, customers, clients, suppliers or competitors of the Company.

All Personnel are required to report violations or suspected violations of this Policy. Personnel (other than directors) should promptly report such matters to their immediate supervisor or manager, the Company Secretary or chair of the Audit and Risk Committee, as is reasonably appropriate. Directors should promptly report such matters to the Board.

2.4 Diversity Reporting

The Company will disclose:

- (a) this Policy, on the Company's website;
- (b) any Measurable Objectives and the Company's progress towards achieving them, in the Company's annual report; and
- (c) the respective proportions of men and women on the board, in senior executive positions and across the whole Company (including how the Company has defined "senior executive" for these purposes), in the Company's annual report.

3. ADOPTION AND REVIEW OF DIVERSITY POLICY

3.1 Adoption of this Policy

The Board adopted this Policy on 10 November 2021. It takes effect from that date and replaces any previous Company policy in this regard.

3.2 Review of this Policy

This Policy can only be amended with the approval of the Board. The Board will review this Policy at least annually to ensure its effectiveness and will communicate any amendments to Personnel as appropriate.