



HUMAN RESOURCES POLICY

ROCKSURE INTERNATIONAL LTD

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POLICY NAME	CODE OF CONDUCT			POLICY NO.	
EFFECTIVE DATE	MARCH 2021	DATE OF LAST REVISION		VERSION NO.	
ADMINISTRATOR RESPONSIBLE	HUMAN RESOURCES DEPARTMENT		CONTACT INFORMATION		
APPLIES TO Apply group names to define applicable areas of staff.					
GROUP 1		GROUP 2		GROUP 3	
GROUP 4		GROUP 5		GROUP 6	

VERSION HISTORY				
VERSION	APPROVED BY	REVISION DATE	DESCRIPTION OF CHANGE	AUTHOR

ITEM 1.0 APPROVAL AND REVIEW

N/A

ITEM 2.0 ADDITIONAL NOTES

ITEM 3.0 SCOPE

Describe to what and to whom this policy applies.

This policy applies to all RIL employees, contractors, suppliers, clients and stakeholders.

ITEM 4.0 POLICY STATEMENT

Describe the policy and the reason for the policy.

4.1 Rocksure International Limited (RIL) is committed to creating an enabling environment that is ethical, legal and consistent with its values and mission and does not tolerate any act of financial impropriety, corruption or any illegal acts in any of its activities. Where any misconduct of employees has an effect on the image of the company, perpetrators of such illegal activities will face disciplinary sanctions. RIL employees are therefore expected at all times to conduct themselves in the manner that reflects the company's values no matter the contrary practices elsewhere.

4.2 The policy is to make employees aware on the need to conducting themselves in a way and manner that will protect the image of the company and also to bring to the understanding of employees the minimum standard of conduct expected from all and which will serve as the basis for disciplinary action.

ITEM 5.0 TERMS AND DEFINITIONS

Define any acronyms, jargon, or terms that might have multiple meanings.

TERM	DEFINITION

ITEM 6.0 POLICY SECTIONS

Policy intro:

6.1 STANDARDS OF CONDUCT

It is of utmost importance for employees to observe highest ethical conduct including but not limited the following:

- 6.1.1 Comply with all company rules and procedures.
- 6.1.2 Commitment to health, safety, environmental and security rules and regulations
- 6.1.3 Managing assets, funds and other properties of company properly
- 6.1.4 Treating others with respect, honor and dignity
- 6.1.5 Exhibiting honesty, truthfulness and trustworthiness in all dealings

6.2 MISCONDUCTS

6.2.1 In all instances of transgressions, there is a range of disciplinary actions, which may be taken depending on the merits of each and every case. Below are some examples of misconduct, which are a subject of disciplinary action.

- 6.2.1.1 Dishonesty or willful damage to the property of the company

6.2.1.2 Endangering the safety of others

6.2.1.3 Theft

6.2.1.4 Gross insubordination

6.2.1.5 Assault

6.2.2 Managers and Supervisor as well as Leaders of various sections to monitor and ensure the adherence of this policy by all employees under them.

6.3 DISCIPLINARY ACTIONS

6.3.1 Disciplinary actions will be executed in line with the provisions in the Collective Agreement between RIL and the Union workers.

6.3.2 Disciplinary actions against staff in Management position will be executed by the directors.

ITEM 7.0 EXCEPTIONS

Describe exceptions here.

N/A

ITEM 8.0 RELATED POLICIES AND OTHER REFERENCES

BRIBERY AND CORRUPTION POLICY,

ITEM 9.0 ROLES AND RESPONSIBILITIES

List the job titles and business offices directly responsible for the policy.

ROLE	RESPONSIBILITY
9.1 HR Officer	9.1.1 HR officers are responsible for communicating the code of conduct to all employees, ensuring that they understand its importance and implications. 9.1.2 Will develop and organize training programs to educate employees about ethical guidelines, anti-bribery, and anti-corruption policies. 9.1.3 HR officers may be involved in monitoring employee PIU with the code of conduct and reporting any violations to higher management.
9.2 HR Manager	9.2.1 HR managers collaborate with legal and PIU teams to develop comprehensive code of conduct policies that address anti-bribery and anti-corruption measures. 9.2.2 They ensure that policies are consistently enforced throughout the organization and that violations are appropriately addressed through disciplinary actions if necessary.

	<p>9.2.3 HR managers may mediate conflicts related to ethical concerns, working to find fair solutions that align with the code of conduct.</p>
<p>9.3 Line Manager</p>	<p>9.3.1 Line managers should demonstrate commitment to the code of conduct in their own actions and decisions.</p> <p>9.3.2 Line managers should guide and advise employees on how to handle ethical dilemmas and potential conflicts of interest that may arise in day-to-day operations.</p> <p>9.3.3 Line managers are should be escalate issues to HR or higher management as needed.</p>
<p>9.4 Directors</p>	<p>9.4.1 Directors should oversee the effective implementation of the code of conduct.</p> <p>9.4.2 Directors should collaborate with legal and PIU teams to establish anti-bribery and anti-corruption policies that align with the company's values and legal obligations.</p> <p>9.4.3 Directors should assess the risks associated with ethical lapses and determine strategies for mitigating these risks.</p>
<p>9.5 PIU Manager contributes</p>	<p>9.5.1 Policy Development:</p> <p>9.5.1.1 The PIU Manager will take the lead in developing and updating the code of conduct, ensuring that it includes clear guidelines on anti-bribery and anti-corruption measures specific to the mining industry.</p> <p>9.5.1.2 Will create comprehensive policies and procedures that align with legal requirements, international standards, and industry best practices to prevent bribery and corruption.</p> <p>9.5.2 Risk Assessment and Mitigation:</p> <p>9.5.2.1 The PIU Manager will assess the specific bribery and corruption risks inherent in the mining sector, considering factors like interactions with government officials, licensing processes, and supply chain vulnerabilities.</p> <p>9.5.2.2 They develop strategies and controls to mitigate identified risks and promote ethical behavior throughout the organization.</p> <p>9.5.3 Training and Communication:</p> <p>9.5.3.1 The PIU Manager will conduct training sessions to educate employees at all levels about the code of conduct, anti-bribery, and anti-corruption policies, emphasizing the importance of PIU.</p>

	<p>9.5.3.2 Will lead awareness campaigns to reinforce ethical values, encourage whistleblowing, and emphasize the consequences of unethical behavior.</p> <p>9.5.4 Monitoring and Reporting:</p> <p>9.5.4.1 The PIU Manager establishes monitoring mechanisms to track adherence to the code of conduct and anti-corruption policies.</p> <p>9.5.4.2 Will create channels for employees to report suspicions or incidents of bribery and corruption confidentially and without fear of retaliation.</p> <p>9.5.5 Investigation and Resolution:</p> <p>9.5.5.1 In the event of alleged violations, the PIU Manager will conduct thorough investigations to determine the veracity of claims and takes appropriate action based on the findings.</p> <p>9.5.5.2 Will implement corrective measures and disciplinary actions as needed, ensuring that violations are addressed promptly and consistently.</p> <p>9.5.6 External Engagement:</p> <p>9.5.6.1 The PIU Manager will stay informed about changes in relevant laws and regulations related to anti-bribery and anti-corruption, adapting the company's policies accordingly.</p> <p>9.5.6.2 Will engage with relevant external stakeholders, such as regulatory authorities and industry associations, to stay current on PIU standards and expectations.</p> <p>9.5.7 Reporting to Leadership:</p> <p>9.5.7.1 The PIU Manager will report regularly to senior management and the board of directors on the state of PIU with the code of conduct and any anti-bribery and anti-corruption initiatives.</p> <p>9.5.7.2 Will provide recommendations for continuous improvement, highlighting areas that may require additional attention or resources.</p> <p>9.5.8 Ethical Leadership:</p> <p>The PIU Manager will serve as a role model for ethical behavior within the organization, promoting a culture of integrity and accountability.</p>
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9.6 PIU Officer	9.6.1 The PIU officer will play a key role in developing and updating the code of conduct, ensuring it complies with relevant laws and industry standards.
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	<p>9.6.2 Will conduct training sessions to ensure all employees are aware of the code of conduct and its anti-bribery and anti-corruption components.</p> <p>9.6.3 The PIU officer will monitor adherence to the code of conduct, investigates violations, and reports findings to higher management and relevant authorities when required.</p>
9.7 Employees	<p>9.7.1 All employees have a responsibility to adhere to the code of conduct, which includes refraining from engaging in bribery, corruption, or unethical behavior.</p> <p>9.7.2 Employees should promptly report any violations or concerns related to the code of conduct to their supervisors, HR, or designated reporting channels.</p>

ITEM 10.0 CONTACTS

List contacts in the table.

SUBJECT	CONTACT		PHONE	EMAIL