

Product Stewardship Standard

Purpose and Objectives

The purpose of this Global Standard is to establish the minimum requirements to manage environmental, safety, health, human rights and other social impacts from the sale of Newmont Corporation (NC) "Products". "Products" are defined as Products sold including doré, concentrate, carbon fines, and process streams that have marketable value due to their concentrations of gold, silver, copper or other constituents. Elemental mercury is not a Product per NC's Sustainability and Stakeholder Engagement Policy and shall not be sold, given away or otherwise transferred to a buyer or processor unless it is for the sole purpose of permanent retirement.

The objective of the Product Stewardship Standard is to ensure the full metals value of delivered Products and consider the downstream environmental, safety, health, human rights, and other social impacts during the storage, loading, transportation, and off-site processing.

Additional information and guidance for implementing this standard is provided in the supplementary Product Stewardship Guidance document.

Scope

The scope of this Standard is global. It applies to all directors, officers and employees of Newmont Corporation ("NC") or any entity that is controlled or managed by NC (together with NC, "Newmont" or the "Company"). In addition, where explicitly stated in an applicable contract, it may apply to Newmont's contingent workers, vendors, contractors, and other types of business partners. It is applicable to all sites and in all phases of the mine life cycle including exploration, design, construction, operation and closure.

Transition Period: sales to new counterparties, processors, shipping locations, etc. that occur after this Standard is effective must be in compliance with it, while reviews for all existing counterparties shall be complete by December 31, 2021.

Content

1. General Requirements

- 1.1. Marketing & Sales shall communicate the requirements of this Standard to buyers and processors of Products and to the extent practicable, Marketing and Sales and regional and corporate S&ER shall influence buyers and processors to manage environmental risks in accordance with the life cycle perspective of ISO14001.
- 1.2. All existing and/or prospective buyers and processors shall complete a Product stewardship specific prequalification 'registration' process that includes an anti-bribery and anti-corruption screening, historical environmental and safety performance review, human rights history, and mercury management review. A relevant tier risk rating shall be assigned to each buyer and processor as a result of the screening process.
- 1.3. Corporate Marketing & Sales with support from corporate S&ER shall maintain a buyer and processor register that includes contract duration, tier risk rating, and special conditions for high risk buyers and processors.
- 1.4. To the extent practical, Marketing & Sales shall include Product contract clauses to reduce environmental, health, safety, and human rights impacts by buyers and processors of NC Products.

2. Operations Requirements

- 2.1. Site Processing and Site Health, Safety & Security shall characterize Products and develop Safety Data Sheets compliant with the Globally Harmonized System of Classification and Labelling of Chemicals and jurisdictional regulations prior to first sale.

- 2.2. Marketing & Sales or S&ER shall review all new and revised Safety data Sheets and characterization tests.
- 2.3. Marketing & Sales with the assistance of process operations shall determine the appropriate transport codes for shipment of Products.
- 2.4. Site process operations shall re-characterize Products and amend Safety Data Sheets and transport codes as required by regulations or changes in processing.
- 2.5. Prior to shipment of Products, Marketing & Sales and/or Supply Chain shall ensure that all regulatory transport approvals are obtained and that site procedures have been developed, inclusive of safe handling, storage or packaging of Product in accordance with regulatory requirements.

3. Performance Monitoring

- 3.1. Corporate or regional S&ER shall conduct periodic, or at least once every three years, desktop or onsite reviews of buyers and processors based on tier risk profile, quantity, and quality of the Product sold. Third party audit reports, buyers/processors self-assessments, ISO14001 certification, London Bullion Market Association (LBMA) certification, Minamata Convention on Mercury compliance, and other industry accepted methods shall be considered.
- 3.2. Corporate or regional S&ER, Marketing & Sales, or designees shall periodically, or at least once every three years, inspect on-site and off-site facilities that store Products prior to shipping.
- 3.3. Marketing & Sales or designee shall periodically, or at least once every three years, assess the metals value performance of Products with a focus on sampling and assaying processes and metallurgical accounting.

Terms

- Anti-bribery/anti-corruption - Opposing, discouraging or punishing bribery/corruption The U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act set the general parameters for defining bribery and corruption around the world.
- Buyers – Customers that buy NC Products in one-off purchases in the case of ‘out of spec’ or exotic materials or ‘in-spec’ concentrates under long-term contracts.
- Concentrate – The Product of mineral flotation that contains the majority of valuable metals (e.g., copper and gold) that were present in the ore.
- Doré – Partially refined gold bar consisting of gold, silver and impurities.
- Human rights – Rights inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more.
- ISO 14001 – International standard that specifies requirements for an effective environmental management system.
- London Bullion Market Association (LBMA) – Trade association for the 'over the counter' gold and silver market in London. LBMA is responsible for the regulation of such areas as refining standards, trading practices, and the certification of the bullion used to make gold and silver bars and coins.
- Minamata Convention on Mercury – International, legally-binding treaty designed to protect human health and the environment from anthropogenic emissions and releases of mercury and mercury compounds.
- Processors – Buyers or other entities (e.g., toll contracted facilities) external to NC operations that perform additional processing of NC Products.

References

- Doré Sample Retention Procedure – NEM-TRE-PRO-002
- Globally Harmonized System of Classification and Labelling of Chemicals, United Nations, 1st Revised Edition 2005

- Human Rights Standard – NEM-SER-STA-022
- IMS Assessment Management Program System Procedure – NEM-IMS-MSP-008
- IMS Interactions, Inspections and Audits Standard – NEM-IMS-STA-008
- ISO 14001:2015 – Environmental Management Systems
- Minamata Convention on Mercury, United Nations Environment Program, October 10, 2013.
<http://www.mercuryconvention.org/Convention/Text>
- Product Stewardship Guidance – NEM-SER-GDL-009-001
- Supplier Management Standard – NEM-IMS-STA-012
- Sustainability and Stakeholder Engagement Policy – NEM-SER-POL-001
- UN Guiding Principles on Business and Human Rights

Document control

VERSION	AUTHOR	APPROVER	APPROVAL DATE
1	Mike Aire	Global Governance Committee	9/21/18
2	Mike Aire	Global Governance Committee	2/12/2020