



INTRODUCTION

Achieving Newmont Corporation's ("Newmont") purpose to create value and improve lives through sustainable and responsible mining requires us to demonstrate that our gold has been extracted in a manner that does not cause, support or benefit unlawful armed conflict or contribute to serious human rights abuses or breaches of international humanitarian law. Newmont takes this responsibility seriously and has adopted the World Gold Council's Conflict-Free Gold Standard ("the Standard"). Our commitment to the Standard is available on our [website](#). This Conflict-Free Gold Report summarizes how Newmont conformed to the requirements of the Standard for the year ended December 31, 2019. The Executive Vice President and Chief Sustainability & External Affairs Officer is responsible for implementation, and reports to the Chief Executive Officer as well as the Safety and Sustainability Committee of the Board of Directors, who has ultimate responsibility for Newmont's compliance.

REPORTING BOUNDARY

The reporting boundary of this Conflict-Free Gold Report includes all mining and processing operations over which Newmont had 50% or more control in the calendar year ended 2019. This is consistent with the reporting boundaries that Newmont publicly discloses in its 2019 Beyond the Mine sustainability report. In April 2019, Newmont acquired Goldcorp, adding seven new mines to its portfolio and expanding the scope of this Conflict-Free Gold Report. A link to the reporting boundaries, along with a comprehensive list of Newmont operations included in the reporting boundary is provided in Attachment A.

NEWMONT'S EVALUATION

PART A - CONFLICT ASSESSMENT

In order to evaluate Part A of the Standard, Newmont conducted a review of the international sanctions as listed in Attachment B to assess whether international sanctions have been imposed on the countries in which we have mines. We concluded that no applicable international sanctions have been imposed on the countries in which we had mining operations during the year ended December 31, 2019.

As part of the Conflict Assessment evaluation, Newmont also reviewed the Conflict Barometer published by the Heidelberg Institute for International Conflict Research to determine whether the area(s) in which our mines are located are classified as "conflict affected or high risk." According to the Heidelberg Conflict Barometer, out of the countries in which Newmont has mining operations, Mexico was the only one ranked 5 (war) on a national level because of drug cartel activities. According to the same source, the Zacatecas state of Mexico in which Newmont's Peñasquito mine is located does not exceed a level 3-violent crisis. Despite this, in an effort to be transparent about its practices and ensure full compliance with the Standard, Newmont undertook assessments of Parts B through E as set out in the Standard for this one operation.



PART B - COMPANY ASSESSMENT

Part B of the Standard assesses whether the company has the appropriate systems in place in order to discharge its corporate obligations and responsibilities, to avoid causing, supporting or benefiting unlawful armed conflict, or contributing to serious human rights abuses or breaches of international humanitarian law. In order to meet the requirements of Part B of the Standard, Newmont evaluated whether its policies, processes and procedures were adequate to ensure conformance with the Standard for the Peñasquito mine in Mexico. Based on the supporting evidence below, which includes examples of Newmont's commitments and practices, Newmont concluded that it is in conformance with the Standard.

Commitment to respecting human rights

- Outlined in our [Sustainability and Stakeholder Engagement Policy](#) and operationalized through our [Human Rights Standard](#)
- Activities to mitigate Modern Slavery risks are detailed in our [Statement](#) and further detail on our human rights program is provided in our [Guide](#)

Corporate Activities

- Country risk program which provides an understanding of socio-political risks in countries and sub-regions
- Mexico Country Risk Review – Focus on Zacatecas (published January 2019) includes analysis of national and provincial issues, including potential corruption issues and mitigation measures

Security

- Implementation of the Voluntary Principles on Security and Human Rights (“VPs”) as outlined in our [annual report](#) to the VPs plenary
- Assessment of the security-related human-rights risk exposure in relation to the Voluntary Principles on Security and Human Rights for Peñasquito which provided a qualitative risk assessment of social and security factors associated with the operating environment and incorporating UNICEF Child’s Rights and Security Checklist

Payments and benefits-in-kind

- Through our [Code of Conduct](#), membership of [Partnering Against Corruption Initiative](#) and [Business Integrity Policy](#), we outline our commitments to integrity and doing business in a responsible way wherever we operate, including the minimum requirements for effectively managing the risks associated with government payments. After Newmont acquired Goldcorp, an integration process took place. In the final quarter of 2019, Newmont rolled out its Code and main standards which were acknowledged by all employees (including former Newmont and former Goldcorp employees). Newmont also provided online training for employees with permanent access to computers, including those employees who have decision-making authority related to payments and in-kind donations.



- Our Conflict of Interest Standard requires employees to disclose all actual or potential Conflicts of Interest via an online platform every other year.
- Our Anti-Corruption Standard has requirements around prohibiting government payments and improperly influencing Government Officials, as well as establishing different levels of approvals for providing anything of value to a Government Official.
- Our Gift registry tracks gifts and entertainment received from and given to third parties.
- We commit to the [Extractives Industries Transparency Initiative](#) (“EITI”) and support its implementation in countries where we operate
- We publicly disclose payments to governments in Beyond the Mine, our [annual sustainability report](#) and in our Extractive Sector Transparency Measures Act (ESTMA) report, which is designed to comply with a Canadian regulatory reporting requirement to disclose all in-kind and cash donations to government entities. These reporting initiatives will continue in the future, and, for the 2019 ESTMA report to be submitted in 2020, will include all countries where Newmont sites are located, including all former Goldcorp sites.
- Our Global Business Integrity and Compliance program promotes a culture of integrity and personal accountability through providing information and tools, including training, to identify, evaluate, address and resolve situations in which ethical conduct is critical.
- Business leaders provide quarterly certifications that respective regions maintained effective controls and they are not aware of any interaction or payment by Newmont, or on Newmont’s behalf, that would violate our Code, policies, standards or applicable laws.
- Anti-corruption audits of selected suppliers identified as high risk.
- All third-parties such as beneficiaries of donations and commercial vendors underwent a risk profiling and a risk-based third-party due diligence process which includes, but is not limited to, the screening of the third-party for risks related to sanctions, human rights violations and terrorism.
- In 2019, we completed a targeted data analytics review on payments to detect and deter transactions that are not aligned to the company’s policies and standards. This included the review of all payments issued in Mexico through the company’s Enterprise Resource Planning system. The data analytics consisted of running payments through a series of tests to identify red flags and an in-depth follow-up on any suspicious transactions.

Engagement, complaints and grievances

- Our [Stakeholder Relationship Management Standard](#) outlines the requirements for all sites to adequately identify and effectively engage local communities and have appropriate complaint and grievance mechanisms in place
- The [Integrity Help Line](#) supports the identification of issues in breach of our commitments
- Site level complaint and grievances mechanisms and registers are required at all sites to address external stakeholder concerns in a timely and effective manner



PART C - COMMODITY ASSESSMENT

Part C of the Standard assesses the processes in place to manage the movement of gold and gold-bearing material while in the custody of the company, so as to mitigate against the misuse of this material by groups associated with unlawful armed conflict. Newmont puts in place strict controls to ensure no materials are misappropriated in transit. These include GPS tracking on the armored trucks used for transporting material from the mine to the Port and weighted truck beds. Weights are recorded and reconciled during each leg of transportation including mine site, port facilities, and receipt at smelter.

PART D - EXTERNALLY SOURCED GOLD ASSESSMENT

DOCUMENT/SOURCE TITLE	DOCUMENT AUTHOR	PURPOSE
Newmont internal Conflict-Free Gold Assessment forms and supporting documentation (shipping manifests, bills of lading, shipper contracts and related evidence) signed and certified by regional leadership, provided to external assurance provider for review.	Newmont	Confirmation from each site that there has been no externally sourced gold originating in conflict-affected or high-risk areas

PART E - MANAGEMENT STATEMENT OF CONFORMANCE

Newmont confirms, to the best of our knowledge, that the gold produced by Newmont-operated mines in the United States, Peru, Suriname, Ghana, Canada, Argentina, Mexico, and Australia does not, in any way, contribute to armed conflict or human rights abuses or breaches of international humanitarian law.

The mining operations covered in this report have the appropriate systems and controls in place to conform to the World Gold Council's Conflict-Free Gold Standard and the company's Conflict-Free Gold report for 2019 was subject to independent assurance.

This Statement of Conformance is provided by Newmont as part of the conformance requirements for the World Gold Council's Conflict-Free Gold Standard and to provide good faith representation to the next participant in the chain of custody.

INDEPENDENT ASSURANCE

Newmont engaged the services of the assurance provider, Apex Companies, LLC (Apex), and their independent limited assurance statement can be viewed along with this report, and Newmont's Conflict-Free Gold Standard at: www.newmont.com. Apex concluded that Newmont was in conformance with the criteria set out in the Conflict-Free Gold Standard for the reporting year ended 31 December 2019. Additional information regarding supply chain stewardship can be found in our 2019 Beyond the Mine sustainability report.



If users of this report wish to provide any feedback to Newmont with respect to the Conflict-Free Gold Report, they can contact Sarah Jones at: Sarah.Jones@newmont.com, Daniel Kern at: Daniel.Kern@newmont.com, Claire Larner at: Claire.Larner@Newmont.com or Nicholas Cotts at: Nicholas.Cotts@Newmont.com.



ATTACHMENT A - NEWMONT OPERATIONS CONSIDERED IN THIS REPORT

Newmont's Conflict-Free Gold Report includes the following mines.

- Ahafo (Brong Ahafo Region, Ghana)
- Akyem (Eastern Region, Ghana)
- Boddington (Western Australia, Australia)
- Borden (Ontario, Canada)
- Cerro Negro (Santa Cruz, Argentina)
- Cripple Creek & Victor Mine (Colorado, United States)
- Éléonore (Quebec, Canada)
- Kalgoorlie Consolidated Gold Mines (WA, Australia)
- Merian (Suriname)
- Musselwhite (Ontario, Canada)
- Peñasquito (Zacatecas, Mexico)
- Porcupine (Ontario, Canada)
- Red Lake (Ontario, Canada)
- Tanami (NT, Australia)
- Yanacocha (Cajamarca, Peru)

This report does not cover exploration sites or projects under development.

Refer to the 2019 Beyond the Mine annual sustainability report for further details regarding our reporting boundary.



ATTACHMENT B - CONFLICT-FREE GOLD REPORT: EVIDENCE SUMMARY

PART A - CONFLICT ASSESSMENT

DOCUMENT/SOURCE TITLE	DOCUMENT AUTHOR	PURPOSE
International Sanctions List https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list	UN Security Council	No sanctions related to Newmont Operations
Sanctions Programs and Country Information https://www.treasury.gov/resource-center/sanctions/programs/pages/programs.aspx	U.S. Department of the Treasury	No sanctions against any country where we operate
Newmont Country Risk Assessment Model (Proprietary internal document)	Newmont	Internal program of ongoing due diligence and monitoring
Conflict Barometer 2019 https://hiik.de/conflict-barometer/current-version/?lang=en	Heidelberg Institute for International Conflict Research	Mexico classified as conflict affected or high risk area, though Zacatecas state is not.
Conflict Barometer 2018 https://hiik.de/conflict-barometer/bisherige-ausgaben/?lang=en	Heidelberg Institute for International Conflict Research	No former Newmont sites in countries classified as conflict affected or high risk areas.