



Newmont Corporation

Conflict-Free Gold Standard

Newmont Corporation (Newmont) is committed to responsible and ethical business practices that respect human rights and contribute to sustainable development. Newmont promotes responsible mining practices and is committed to combatting the potential misuse of mined gold to fund armed conflict. This Conflict-Free Gold Standard adheres to widely recognized standards¹ which were developed through broad industry and stakeholder engagement.

Through this Standard, we commit to:

- Not contributing to or supporting financing of conflict in conflict-affected or high risk areas
- Strengthening our engagement with suppliers of gold bearing materials in conflict-affected and high risk areas to ensure that our transactions are not causing, supporting or benefitting unlawful armed conflict or contributing to human rights abuses or breaches of international humanitarian law
- Doing business only with legitimate and law-abiding organizations
- Complying with relevant United Nations' sanctions, resolutions and applicable domestic laws

Newmont requires all employees and third party workers to comply with this Standard, and requires all agents, consultants and business partners involved in Newmont's sourcing of materials containing gold from Conflict-affected and High Risk Areas to comply with this Standard in their internal business conduct and outside commercial transactions. This Standard is enforced through appropriate disciplinary measures up to and including termination of employment or contracts.

Adherence is achieved through a comprehensive management system and subject to external assurance to ensure that we maintain compliance with relevant legislation and standards published by the World Gold Council, London Bullion Market Association, and the OECD.

This Standard supplements Newmont's Code of Conduct, Business Integrity Policy and its Sustainability and Stakeholder Engagement Policy.

Tom Palmer
President and Chief Executive Officer
September 10, 2020

Please contact Nick Cotts, Senior Vice President, External Relations for more information about this Standard.

¹ These standards include the OECD's Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and the World Gold Council's Conflict-Free Gold Standard. Conflict Affected and High-Risk Areas are defined as Heidelberg Conflict Barometer intensity 5 and 5 countries or regions classified as such within those countries.



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Specific tenets of our Conflict-Free Gold Standard are as follows:

1. Newmont will neither tolerate nor knowingly profit from or contribute to, assist or facilitate those governments, groups or individuals who engage in the commission of: torture; cruel, inhuman or degrading treatment; forced or compulsory labor; illegal child labor (especially the “worst forms” of child labor as defined by International Labour Organization Convention No. 182); human rights violations or abuses; war crimes; violations of international humanitarian law; or crimes against humanity or genocide.
2. Newmont will not engage with, and will immediately discontinue any existing engagement with, suppliers when there is an identifiable and reasonable risk that they are committing, or are sourcing from or linked to any party committing, the abuses described in paragraph one above.
3. Newmont will not support and will not tolerate support to groups or their affiliates who: illegally control mine sites, transportation routes, points where conflict minerals are traded and/or upstream actors in the supply chain; tax or extort money or conflict minerals at mine sites, along transportation routes or at points where conflict minerals are traded. “Support” includes, but is not limited to: procuring gold from, making payments to, or otherwise providing assistance or equipment to governments, groups or individuals as described in paragraph one above.
4. Newmont will not deal with, and will immediately discontinue engagement with, suppliers when there is an identifiable and reasonable risk that they are sourcing from, or linked to, any party providing support to groups as described in paragraph three above.
5. Newmont is a participant in The Voluntary Principles on Security and Human Rights multi-stakeholder initiative. Newmont affirms that the role of public or private security forces is to provide security to workers, facilities, equipment and property in accordance with the rule of law, including laws that guarantee human rights. We will not provide support to security forces that commit abuses or that act illegally as described in paragraphs one and three above.
6. Newmont will use only appropriate and lawful means to persuade government officials to render decisions or exercise discretion for the benefit of Newmont. Efforts in matters affecting Newmont’s interests must be based solely on the merits of the matter and pursuant to proper procedures. Newmont participates in and adheres to the principles of the World Economic Forum’s Partnering Against Corruption Principles for Countering Bribery. Newmont will not offer, provide or solicit, directly or indirectly, any special treatment or favor from a government official in return for anything of economic value or the promise or expectation of future value or gain. This interaction with government officials is outlined in our International Anti-Corruption Compliance Manual.
7. Newmont will not disguise the origin of gold, or misrepresent taxes, fees or royalties paid to governments for the purposes of extraction, trade, handling, transport or export of gold.



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8. Newmont will support and contribute to the effective elimination of money laundering where there is an identifiable and reasonable risk of money-laundering resulting from, or connected to, the extraction, trade, handling, transport or export of gold. Newmont will not conduct business with parties who may be involved in or who support terrorist activities. Similarly, we will not knowingly accept funds that are derived from unlawful sources or activities. Newmont is committed to complying fully with all applicable anti-money laundering laws throughout the world.