



Code of Conduct

2026



Living Our Values, Every Day

At Newmont, how we work matters just as much as what we achieve.

Our purpose is unearthing value sustainably to advance lives, and the way we do this defines our impact across generations.

In a fast-changing world, our values – Be Always Safe, Care deeply, Deliver responsibly and Improve daily – are our compass and establish expectations on how we will work together.

The Code of Conduct is our foundational governance document. It turns our values into practical guidance for how we work, make decisions and treat one another and our stakeholders every day. It applies to everyone working for or on behalf of Newmont – employees, contractors, leaders and partners – and reflects our shared responsibility to act with integrity and do what's right, for today and tomorrow, even when it's hard.

This Code empowers us to speak up, know and support each other and lead with purpose and accountability in our work.

We are all in this together, and we will all face moments when choosing the right path won't be the easiest decision. We want you to know that we have your back, so that you can always feel comfortable doing what is right when conducting your work at Newmont.

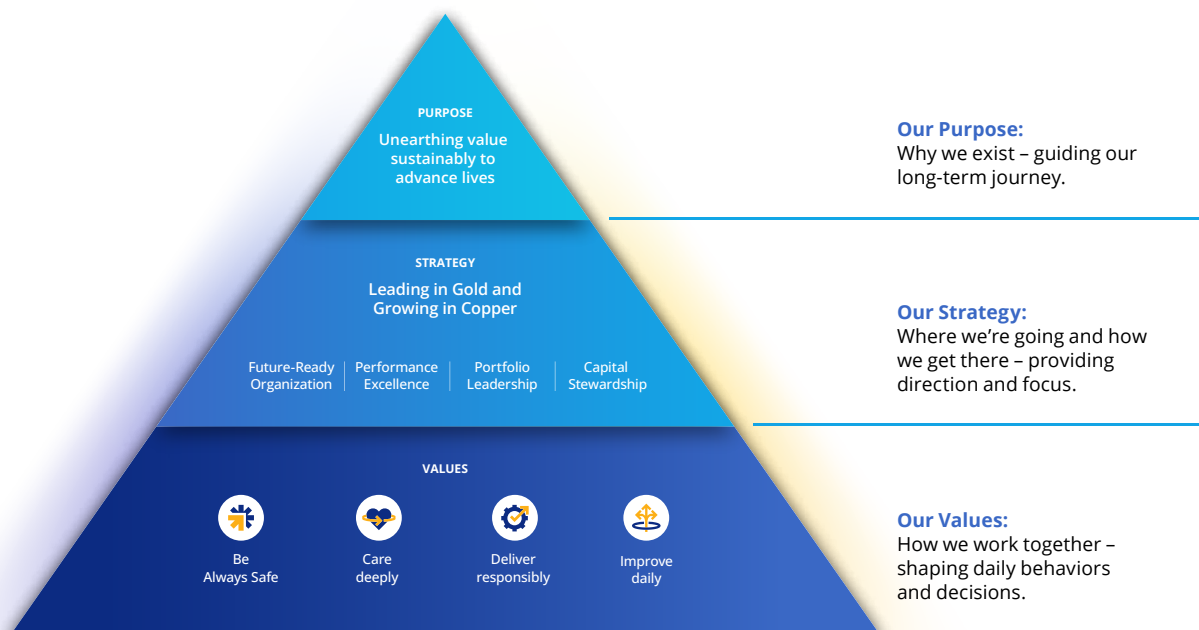
Thank you for making the right choices, and for making Newmont a company that we can all feel proud to work for and be a part of.

Sincerely,

Natascha Viljoen
President and
Chief Executive Officer

Greg Boyce
Independent Chair,
Board of Directors,
Newmont Corporation

Our Value Story



Be Always Safe

- **We put safety first, always** – ensuring we all get home safe.
- We **consider the whole person** – our physical and mental wellbeing.
- We call out **risks early and act on them** before they can happen.



Care deeply

- We **take time to know each other as people**, beyond our roles.
- We **respect the customs, cultures and steward the environments** wherever we operate.
- We create a place where **people of all backgrounds** belong.



Deliver responsibly

- We **act with integrity – doing what's right for today and tomorrow**, even if it's hard.
- We **do what we say we'll do** – and are transparent when something gets in the way.
- We own our work and its impact on all stakeholders, **trusting others to do the same**.



Improve daily

- We have the **courage to speak up and the curiosity to listen**.
- We **take initiative and adapt how we work** when things change around us.
- We **look for better and more efficient ways to do our work and keep learning** along the way to be future ready.

Our Code of Conduct

Our Code guides how we work with each other and interact with stakeholders, including community hosts, traditional and Indigenous authorities, regulators, and business partners. It is based on principles that match our values and shape how we work at Newmont. These principles are supported by our policies, standards and guidelines, which form our governance structure. While the Code may not cover every situation, it is a reliable guide when you face challenges or uncertainty. If you need more help, contact your functional leader or the Business Integrity and Compliance team.

Applicability

Newmont's Code of Conduct applies to anybody working for, or on behalf of, Newmont. Specifically, all employees, officers, directors, partners, vendors and contractors, including controlled subsidiaries and related entities.

Compliance as a condition of employment

Complying with all applicable laws, and with the letter and spirit of the Code of Conduct, is not only an expectation but also a condition of employment at Newmont. Confirmed instances of non-compliance with our Code or with the law will trigger corrective and/or disciplinary measures as applicable, up to and including termination of employment.

We are individually responsible for...

- Familiarizing ourselves with the Code's principles and making sure we understand and comply with its requirements.
- Taking concrete actions to make sure the team members or third parties we oversee as part of our role at Newmont are familiar with the principles required by our Code.
- **Asking** with genuine interest, **listening** empathetically and **acting** when concerns are brought to our attention – either by addressing the situation or by escalating it to a member of leadership, the People team, the Legal team or the Business Integrity and Compliance team.
- Promptly speaking up when something does not feel right.
- Informing our functional leaders and the People team of any legal charges (including traffic violations if we operate a vehicle for the company) or convictions we have, or are subjected to, in a timely manner.

Be Always Safe



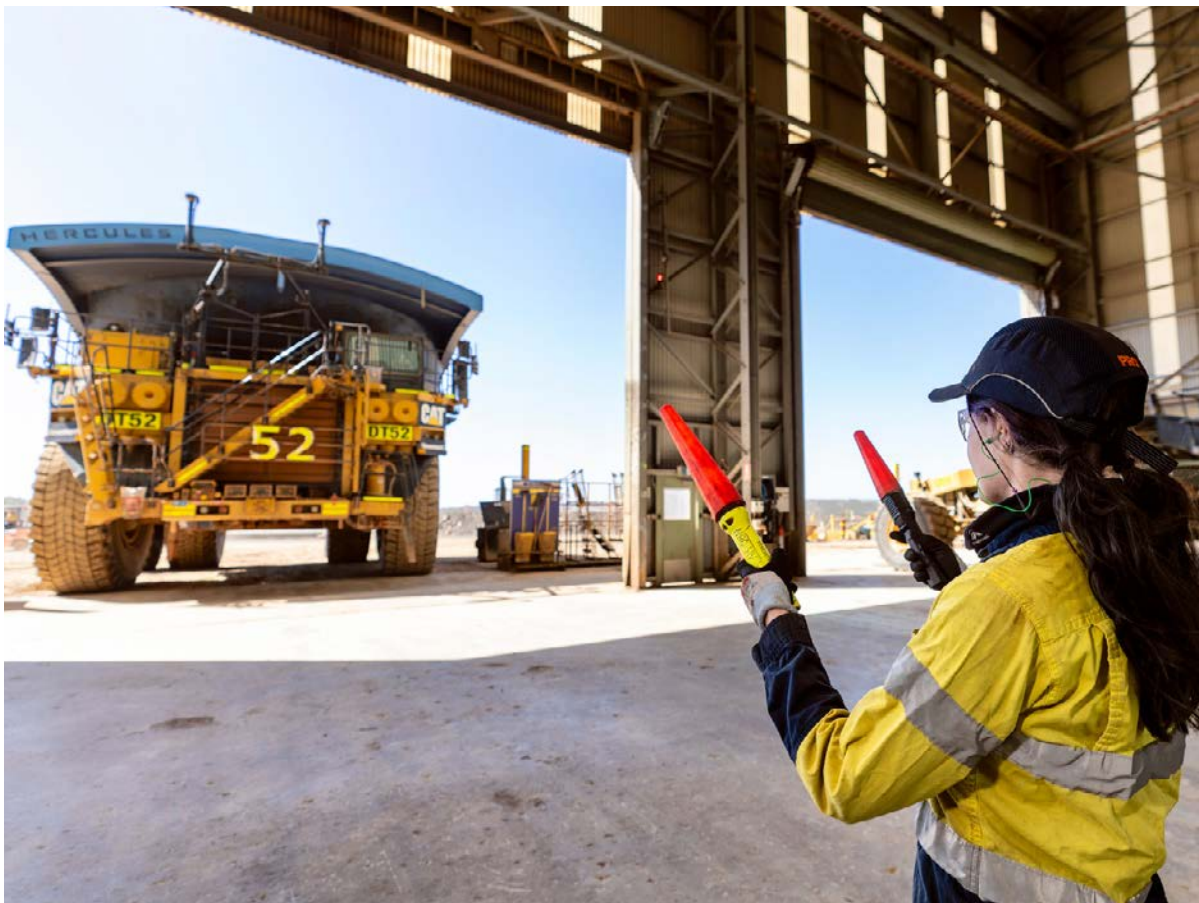
Safety is our promise and our commitment to one another

We put safety first, always. We do our work while considering everyone's and our own physical and mental wellbeing. We are intentional in how we plan to do our work, taking care of ourselves and our colleagues, calling out risks early and acting on them before they can happen. We take personal accountability to ensure that everyone returns home safely and in good health at the end of each workday or shift.

We are intentional in maintaining our equipment and work areas in safe and reliable condition, and in operating them in a safe and responsible way to support sustainable performance.

We are committed to fostering a workplace where psychosocial health and safety is a way every workplace is experienced. Newmont's health and safety policies, standards, systems and procedures are in place at all times, wherever we operate.

We expect everyone, especially those with the responsibility to lead teams, to demonstrate and promote unwavering health and safety leadership, ensuring that a safe and healthy workplace remains at the core of everything we do.



Care Deeply



We embrace collaboration and uphold universal respect for all colleagues

We take time to know each other as people beyond our roles, and are respectful, inclusive and collaborative through the promotion of an environment where everyone willingly gives their best.

Together, we share the responsibility of maintaining a safe work environment where all employees are treated with dignity and respect and that is free from harassment, bullying, violence, discrimination and sexual misconduct (e.g., sexual jokes, unwelcome advances or physical contact, assault, lewd comments, pornography). These behaviors are strictly prohibited. Newmont also prohibits any threats or acts of violence while conducting business on or off Newmont's premises.

We value and promote inclusion

We create a place where people of all backgrounds belong. By valuing the different perspectives of our global workforce, partners, contractors, and host governments and communities, we foster an environment where inclusion drives innovation, problem-solving and mutual respect.

We are committed to maximizing local employment to ensure our workforce reflects the communities in which we operate and remain dedicated to creating the conditions where every individual willingly gives their best.

We respect human rights

We respect human rights and the customs and cultures of our host communities and of everyone working for us, or on our behalf, across our value chain.

We work to uphold and promote the internationally recognized human rights, as set forth in the International Bill of Human Rights and the ILO Declaration of Fundamental Principles and Rights at Work, and work to prevent and mitigate adverse impacts from our business activities to the rights of others.

We promote sustainability

We are committed to upholding the highest standards in environmental stewardship, social responsibility and economic performance by understanding that sustainability is integral to our purpose of unearthing value sustainably to advance lives.

We actively engage with host and neighboring communities to understand and mitigate the impacts of our operations on livelihoods, health and safety.

Deliver Responsibly



We work honestly and in the best interests of Newmont

We act with integrity and do what's right for today and tomorrow, even if it's hard.

We are committed to acting in Newmont's best interests in everything we do and proactively avoid situations where our personal interests could conflict, or even appear to conflict, with Newmont's interests.

We recognize that conflicts of interest – whether real, potential or perceived – can undermine trust, integrity and the quality of our work.

We do not take personal advantage of opportunities that we discover through our work for Newmont, and we do not use Newmont property or information for our own or our family members' or friends' gain.

We understand that we are individually responsible to promptly and fully disclose and seek guidance from the Business Integrity and Compliance team when instances of real, potential or perceived conflicts of interest arise.

We are all stewards of Newmont's good name and reputation

We understand that Newmont's reputation is not only a valuable asset but also a key enabler of our business success. Each of us is accountable for our actions, whether within the workplace or in personal settings – including social media and other digital platforms – and understand that our conduct may reflect on Newmont and significantly influence its standing.

We are mindful of how our personal conduct may be perceived in relation to Newmont and take responsibility for upholding its reputation at all times.

We do what we say we'll do – and are transparent when something gets in the way

We own our work and its impact on all stakeholders, trusting others to do the same. We promptly and accurately disclose, through the approved company interlocutors, information that could reasonably influence stakeholders' decisions about Newmont, noting that some of this information may be forward-looking based upon our best current assumptions and therefore involving inherent risks and uncertainties.

We compete fairly and honestly in the market and comply with all applicable competition (or antitrust) laws and regulations. To this end, we do not share operational, commercial or competitive information with our current or potential competitors.

We do not trade Newmont stock, or the stock of any other company, based on material, non-public information, nor do we share such information with others for their benefit.

We create and maintain complete and accurate company records that reflect the nature of the transactions they represent.



We follow established standards for operations and resource development

We adhere to our internal operational procedures by consistently following established standards, promoting transparency and ensuring accountability in all our actions. These standards are designed to guarantee that we perform in a manner that delivers value for all our stakeholders while honoring our commitments to corporate responsibility.

We protect Newmont's property and information

We are committed to safeguarding Newmont's property at all times, including physical/tangible assets such as facilities, equipment, vehicles, financial resources, commercial contacts, computers and digital systems, as well as intangible assets, such as data, intellectual property and sensitive or confidential information.

We prioritize the protection of our business data and foster a culture of shared responsibility for cybersecurity across all levels of Newmont personnel.

We value the privacy and security of personal data

We value the privacy and security of all personal data entrusted to us by our employees, customers, business partners, community stakeholders and shareholders, among others, and are committed to ensuring that individuals understand how their personal data is (or will be) used and protected.

We are committed to lawfully collecting, processing and storing personal data, ensuring that it is protected through appropriate technical and organizational measures maintaining high standards of data security in compliance with all applicable privacy and data protection laws and regulations. In the event of a data breach or privacy concern, we follow established incident response protocols with defined escalation paths for timely reporting and resolution.

We have zero tolerance for fraud and corruption

We comply with all applicable anti-corruption laws and do not engage in any form of fraud, bribery or corruption.

We strictly prohibit any attempt to improperly influence government representatives, traditional authorities or any other party through bribes, kickbacks, unofficial facilitation payments or other corrupt practices – whether directly or indirectly through intermediaries.

We understand that if we decide to participate in political activities outside of Newmont-sponsored initiatives, it must be done in our own time, with our own resources and while making it abundantly clear that our political views and actions are our own and not Newmont's. We also understand that engaging in these activities may require a conflicts of interest disclosure where these are, or may appear to be, contrary to Newmont's interests and/or values.

We never request or accept anything of value from a third-party that could improperly influence, or appear to influence, our decisions or actions in Newmont's best interests.

We seek guidance from the Business Integrity and Compliance team before offering any gifts, entertainment, sponsored travel, sponsorships, donations or contributions to (or through) government officials, traditional authorities and/or political actors – including traditional or culturally customary gifts – regardless of amount.

We promptly raise concerns or red flags with regards to corruption through our functional leader or through the Business Integrity and Compliance team.

We do not engage with or facilitate money laundering or fund/support criminal or anti-social forces

We do not engage with, facilitate, fund or support – directly or indirectly – any anti-social forces, including but not limited to organized crime groups, entities affiliated with criminal organizations or any parties that pursue their objectives through violence, intimidation or unlawful means.

We strictly prohibit all forms of money laundering in connection with our business activities and comply with all applicable laws and regulations aimed at preventing money laundering, terrorism financing and organized crime.

We remain vigilant for unusual or suspicious arrangements or transactions, promptly reporting these to our functional leader or to the Business Integrity and Compliance team.

We abide by trade controls and sanctions

We comply with all import and export controls, economic sanctions and customs laws that regulate the movement of Newmont goods, services, information and technology around the world.

We evaluate sanctions compliance in the jurisdictions where we operate or conduct business and do not participate in, or promote, boycotts that the U.S. does not support.

We diligently screen our business partners to ensure adherence with applicable laws and regulations, as well as to preserve Newmont's good name and reputation.

Improve Daily



We have the courage to speak up and take action when we become aware of a potential breach of our Code of Conduct

We promptly speak up whenever we become aware of, or suspect, misconduct using the various channels available to us for this purpose, including our functional leaders, Legal and People functions, Business Integrity and Compliance team, or via the Business Integrity Helpline.

Good faith reporting of breaches to our Code of Conduct is not only expected but required at Newmont.

We fully cooperate in internal investigations and reviews and do not take any actions that could hinder or obstruct these.

We treat instances of real or suspected misconduct confidentially following a strict 'need-to-know' approach.

We understand that nothing in this Code prevents us from seeking guidance from, or reporting concerns to, relevant authorities, law enforcement or regulators if we deem it necessary or required by law.

We make hiring and promotion decisions fairly

As an equal opportunity employer, we recruit, select, place, promote and compensate employees on the basis of their capability for the role and do not discriminate on the basis of national origin, race, religion, gender identity or expression, marital status, sexual orientation, pregnancy, disability or age or any other attribute that is protected by local law.

Retaliation against those who raise concerns in good faith won't be tolerated

We understand that fostering an environment where everyone feels safe to raise concerns, ask questions and participate in investigations is essential to maintaining a culture of integrity and accountability.

We do not tolerate retaliation in any form against anyone who, in good faith, raises concerns or asks questions about our legal, business integrity or safety obligations.

Retaliatory actions, including detrimental behaviors or employment decisions, against those who report concerns, ask questions or support the execution of internal investigations, are a serious breach of this Code and subject to corrective and/or disciplinary measures, up to and including termination of employment.

We grow through change and continuous improvement

We take initiative and adapt how we work when circumstances change around us, seeking better, safer and more efficient ways to achieve our goals and keep learning along the way.

How Our Governance Works

This Code sets clear expectations for how we work together to advance Newmont's and its stakeholders' interests. It forms the foundation of our Business Integrity and Compliance program and internal governance, supported by the overarching policies listed below and related standards, procedures and guidelines, which can be country-specific. Newmont employees can find an electronic version of the Code and the policies on the company's intranet. Non-employees can find them at www.newmont.com.

- a. Health and Safety Policy
- b. Operations and Resource Development Policy
- c. Fund Commitment and Release Authorization Standard
- d. Business Integrity Policy
- e. People Policy
- f. Sustainability and Stakeholder Engagement Policy

Business Integrity Helpline:

newmontintegrityhelpline.com



6900 E. Layton Avenue, Suite 700
Denver, Colorado 80237
USA

P 303.863.7414

F 303.837.5837

newmont.com