

Business Integrity Policy

Purpose and Objectives

This Policy reflects Newmont's commitment to business integrity. It requires all those engaged in activities on our behalf to work honestly and in the best interests of the Company, to avoid corruption and bribery of any kind, and to ensure compliance with various relevant legal requirements. It also requires those involved in reporting information about Newmont to do so appropriately and in a timely and accurate manner. More specific information on the basic commitments included in this Policy can be found in the Standards listed below.

Scope

The scope of this Policy 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.

Content

1. We work honestly. We are truthful in our work-related interactions, whether in explaining a problem or in reporting results to our supervisor, and we work in the best interests of Newmont.
2. We report Newmont's results accurately. We are committed to providing timely, factual, and accurate disclosure of material information about Newmont. We ensure that material information about Newmont is disclosed in a consistent and appropriate manner, and in accordance with applicable law. We take appropriate measures to protect and prevent the improper disclosure or use of material or confidential information about Newmont.
3. We avoid conflicts of interest. We avoid situations where Newmont's interests and our own interests conflict or even appear to be inconsistent. Hiring or overseeing family members, significant others, and even close personal friends can pose conflicts of interest. Therefore, these types of hiring decisions and supervisory relationships should be avoided or carefully reviewed. Similarly, close relationships with contractors or suppliers can pose real or perceived conflicts. As a result, employees must not participate in decisions on behalf of Newmont about whether to engage with contractors or suppliers if that employee or a family member stand to personally benefit. Employees must also avoid conflicts of interest that could arise because of their involvement with another company, especially if that involvement includes control or employment relationships with suppliers or competitors of Newmont.

4. We do not allow gifts or entertainment to improperly influence our decisions. While giving or receiving gifts or entertainment can be culturally appropriate and part of the normal course of doing business, inappropriately doing so can create the perception of impropriety and violate anti-corruption laws. A gift or provision of entertainment to any government official requires advance approval of your group executive and the Legal Department. All work-related gifts and entertainment worth more than US \$100, given or received by Newmont employees, must be entered in the Gift Registry and adhere to the value limits and approval requirements included in the Standard listed below.
5. We prohibit corruption. Our interactions with our business partners and all government officials and agencies, whether local, regional, or national, are beyond reproach. We do not give bribes, and we only use appropriate and lawful means when engaging with government officials, our partners, and other stakeholders when acting for the benefit of Newmont. We keep accurate books and records of all of our transactions, including those with commercial partners, non-governmental organizations, and government agencies. We are a founding member of the Partnering Against Corruption Initiative and are committed to rigorous anti-corruption principles, including our prohibition on payments to individual government officials to expedite approvals processes (often referred to as “facilitation payments”).
6. We adhere to applicable export controls. Because NC is a United States company operating internationally, Newmont is subject to various laws that control the movement of certain objects and information across borders and to foreign persons within the United States. All employees responsible for the international movement of goods or who may be involved in sharing technology with non-US persons, even within the United States, are required to comply with these laws.
7. We behave honestly in the marketplace. We do not trade in Newmont stock or the stock of any other company based on material information that has not been disclosed to the public, and we do not disclose such information to others so that they may trade based on it. Additional trading restrictions apply to certain officers of Newmont and employees who may have access to Newmont’s financial results before they are publicly released.
8. We are committed to fair competition. We comply with the antitrust laws in our interactions with our suppliers and our competitors in all countries where we operate. We limit our contacts with competitors and do not exchange price or other commercially sensitive information with them without advance approval of the Legal Department.
9. All those engaged in activities on behalf of Newmont are responsible for maintaining truthful and accurate records. We are required by law to keep certain types of financial, safety, environmental compliance, personnel, and other records for certain periods of time. Additionally, we have decided for business reasons to maintain some types of records longer than the law requires. If we have reason to believe that information may become relevant to a legal proceeding, we may not alter or destroy it and must maintain it.
10. We protect the confidentiality of personal information about our co-workers and contractors. We use this information only as necessary for the administration of our Human Resources programs, including payroll and benefits, and for other work-related purposes, such as

arranging travel, addressing law enforcement or security issues, and obtaining permission to work in foreign countries. We limit the disclosure of personal information and respond to any unintentional disclosure according to the laws of the applicable jurisdictions.

References

1. Anti-Corruption Standard
2. Conflict of Interest Standard
3. Disclosure Standard
4. Gifts and Entertainment Standard
5. Personal Information Privacy Standard
6. Records and Controlled Document Management Standard
7. Stock Trading Standard
8. Subsidiary Management Standard
9. US Export Compliance Standard

Document Control

VERSION #	AUTHOR	APPROVER	APPROVAL DATE
1.0	Steve Gottesfeld	Board of Directors	April 23, 2014
2.0	Steve Gottesfeld	Audit Committee	December 5, 2016
3.0	Margaret Brock/Wilby Caceres	Global Governance Committee	November 1, 2019
3.1	Margaret Brock/Wilby Caceres	Global Governance Committee	March 17, 2020