

Political Contributions Standard

Purpose & Objectives

We participate in the legislative and political process in a variety of ways, in order to positively impact the environment in which we operate, to increase the likely success of our operations, and to enhance our future opportunities. The purpose of this Political Contributions Standard (this “Standard”) is to establish the rules Newmont will follow in making political contributions or otherwise engaging in the legislative or political process. In every instance, Newmont intends to act in accordance with all applicable laws and regulations, and to the extent that any applicable law or regulation requires action contrary to that indicated in this Standard, those laws or regulations should take precedence and must be honored.

Scope

The scope of this Standard is global. It applies to all Newmont employees, contingent workers, officers and directors, and to all Newmont vendors, contractors and partners when they are engaged in activities on Newmont’s behalf.

Content

1. **Participation in the Legislative and Political Process.** Public policy decisions, legislation and regulations at the national, state, and local levels significantly impact the environment in which Newmont operates, the success of its operations, and its future opportunities. As a result, Newmont participates globally in legislative processes, and in the United States, in the electoral process, subject to a variety of limitations, as more fully set forth in this Standard.
 - 1.1. **Prior Approval Required.** Our participation in politically-related endeavors must be approved in advance by an Executive in the Governmental Relations Function.
 - 1.2. **Compliance with Laws and Reporting to Board of Directors.** Such participation must always be in accord with all applicable laws and regulations, and shall be reported annually to the Board of Directors and semiannually to the Safety and Sustainability Committee.
 - 1.3. **Transparency.** Additionally, we are committed to providing the public and our investors with transparency about our political involvement.



2. Direct Corporate Political Activity. We care deeply about a variety of issues that are important to our business, our employees, and our communities. We engage with stakeholders regarding a number of issues, including worker health and safety, environmental protection, trade, economic development, infrastructure, and other areas of public policy that contribute to our success. In the United States, Newmont makes contributions to those candidates, ballot initiatives, and other causes that it believes will lead to legislative, regulatory, and public policy decisions that will enhance the success of Newmont and its operations in the long run. These contributions are not limited to candidates of a single political party, and contributions are made without regard for the private political preferences of our Executives.
 - 2.1. Meetings and Engagements with Public Officials. As a global corporation, Newmont regularly engages with elected government officials, candidates for office, political appointees, and their staffs on issues that impact Newmont and its operations. This includes meetings with such officials and attendance at political events to discuss or otherwise influence existing, pending, or possible legislation, regulations or other initiatives.
 - 2.1.1. Prior Approval Required. Any contact by Newmont employees or Newmont governmental relations contractors on behalf of Newmont with elected officials, political appointees, candidates for office, or their staffs must be coordinated with the Government Relations Function. All such activities are reported as required by applicable law.
 - 2.2. Political Contributions. Under U.S. law, corporations such as Newmont cannot provide funding or other support for candidates for federal office. However, many states allow corporations to contribute to state and local candidates or to ballot initiatives. Newmont, where appropriate given Newmont's business interests, may make political contributions to support state and local candidates and ballot initiatives. However, Newmont does not make contributions to candidates for judicial positions. Newmont may also make corporate contributions to non-party political committees organized under Section 501(c)(4) or Section 527 of the Internal Revenue Code or to political parties and other political associations.
 - 2.2.1. Prior Approval Required. All political contributions and expenditures on behalf of Newmont must be approved in advance by an Executive in the Government Relations Function and, if the amount of the contribution is over \$50,000, in advance by the Chief Executive Officer and the General Counsel. Executives in the Governmental Relations Function and the General Counsel regularly review Newmont's political contributions to ensure compliance with this Standard and with all applicable laws. All political contributions made by Newmont are reported to the Safety & Sustainability Committee of the Board of Directors on a semiannual basis and to the full Board of Directors on an annual basis. If Newmont intends to spend more than \$250,000 on political contributions in any single fiscal year, the Board of Directors must approve in advance any such increase.



- 2.2.2. Public Disclosure. Newmont's political contributions are disclosed on its website on an annual basis. For a list of political contributions made by Newmont for the most recent three fiscal years, please click [here](#).
- 2.2.3. Political Contributions Outside of the United States. Newmont will not make any political contributions outside of the U.S.
3. Trade Associations. Newmont is also a member of, and pays dues to, various organizations in the U.S. and abroad. For purposes of this section "trade associations" are understood to be industry trade groups, business associations or sector associations, or similar organizations founded and funded by companies or businesses that operate in the mining or extractive resource industry, which are primarily dedicated to the advancement of the mining and extractive industry with a focus on relevant areas of public policy and industry standard setting. For example, certain trade associations which Newmont is a member of include, without limitation:
- The National Mining Association
 - The Nevada Mining Association
 - World Gold Council
 - Minerals Council of Australia
 - Ghana Chamber of Mines
 - Peru Society for Mining and Petroleum
 - Indonesian Mining Association
 - International Council on Mining and Metals (ICMM)

Some of these trade associations engage in lobbying activities on behalf of the mining industry, or segments of the mining industry, and also may, either directly or through political action committees, provide contributions to political candidates or causes where permitted by law. Newmont does not necessarily support all of the individual initiatives and activities engaged in by these trade associations, but believes that, in general, their activities promote the success of the company. Newmont does not control the manner in which trade organizations use any funds contributed by Newmont, although these groups may solicit the input of members such as Newmont. However, in order to provide additional transparency, Newmont has asked the trade associations to which it belongs to report the percentage of Newmont's contributions that are used for lobbying or political purposes. A list of those United States trade associations for which Newmont's dues or other expenditures exceed \$50,000 annually can be found [here](#), along with the portion of such dues used for lobbying and political contributions, where available.

For the avoidance of doubt, a similar level of executive oversight shall be applied to trade association dues as applied to political contributions. Specifically, any dues paid on behalf of Newmont must be approved by an Executive in the Government Relations Function and, if the portion of the dues attributable to political activities is expected to be over \$50,000, by the Chief Executive Officer and the General Counsel. Additionally, trade association dues or payments made by Newmont are reported to the Safety & Sustainability Committee of the Board of Directors on a semiannual basis and to the full Board of Directors on an annual basis.



4. Newmont PAC. As is the case with many other corporations, Newmont allows eligible employees to contribute to a company-sponsored Political Action Committee called NEWPAC. NEWPAC is a bipartisan committee that contributes to the campaigns of U.S. federal candidates who support public policy initiatives that will enhance the success of the company. Employee contributions to NEWPAC are completely voluntary, and NEWPAC expenditures are reported monthly to the Federal Election Commission and are a matter of public record.

5. Individual Employee Activity. Newmont encourages its employees to participate in the political process; however, employees should always keep in mind that the law requires individual political activity to be an entirely personal matter. Subject to applicable law, Newmont employees, in their individual capacity, may make contributions of their own money in their own name, either directly to candidates or to political action committees. Such contributions are completely voluntary and are not reimbursable by Newmont.

Definitions

“Employee” is a person who is directly on the employee payroll of a Newmont entity.

“Executive” is a Newmont executive at grade E6 or above.

“Newmont” is NMC and all Newmont Affiliates.

“Newmont Affiliate” is any entity which is majority-owned, directly or indirectly, by NMC or which is actively managed by any such NMC majority-owned entity.

“NMC” is Newmont Mining Corporation.

**Approved by Newmont’s Policy & Standard’s Committee as of April 2, 2014. The executive leadership team sponsor of the Standard is Dr. Elaine Dorward-King, Executive Vice President of Sustainability and External Relations.*

Readers are reminded that this Standard may be revised or amended at any time without prior notice, subject to the approval of the Newmont’s Policy & Standards Committee.