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Our Approach to Business Integrity and Compliance

Integrity is fundamental for building and preserving the trust that serves as a foundation for our business. As a core value, integrity guides our daily actions, and our global Business Integrity and Compliance program establishes robust controls and cultivates a culture where all our relationships are based on integrity.

GOVERNANCE

Our global [Code of Conduct](#) (the “Code”) and the following six overarching policies form the foundation for our integrity expectations:

1. [Asset and Value Protection](#)
2. [Business Integrity](#)
3. [Health, Safety and Security](#)
4. [Operations and Resource Development](#)
5. [People](#)
6. [Sustainability and Stakeholder Engagement](#)

These – along with our standards on Anti-Corruption, Conflicts of Interest, Gifts and Entertainment and U.S. Export Compliance – set the minimum requirements for honest and ethical conduct at Newmont.

Our global Business Integrity and Compliance (BI&C) program actively supports adherence to these principles. A global team composed of compliance professionals including lawyers, auditors, systems experts, internal investigators as well as other compliance professionals drive the program’s day-to-day implementation, management and continuous improvement.

Regional and site integrity and compliance managers covering the jurisdictions where Newmont operates report directly to the enterprise BI&C team, enabling consistency and impartiality. We also have a network of integrity advocates, functional compliance coordinators and export compliance coordinators who augment our global compliance program reach.

Our Chief Legal Officer oversees the BI&C program, and the members of the Executive Leadership Team form the members of the Compliance Committee.

The Board of Directors' Audit Committee provides governance and oversight through ongoing communications with leadership and quarterly reports on BI&C performance and activities. Our Board of Directors approves any material changes to the Code and collaborates with management on periodic evaluations.

BUSINESS INTEGRITY AND COMPLIANCE RISK MANAGEMENT

Alleged or actual business integrity, compliance or legal violations pose significant risks to our business, potentially impacting our ability to operate in a certain jurisdiction or resulting in fines, penalties and/or reputational harm.

Our compliance risk assessment presently covers anti-corruption, third-party risk, global trade compliance and corporate compliance. The global fraud risk assessment identifies potential fraud scenarios and ensures controls are in place.

Through processes defined in the RMS, we identify our global compliance risks and map them to site-level risks. The risks, as well as the controls that significantly influence the likelihood and/or consequence of an unwanted event, are reviewed with leadership at least annually (with top risks reviewed more frequently).

Our overall approach to managing risks is detailed in our [Annual Sustainability Report](#) (Risk Management System).

STRATEGY AND MANAGEMENT APPROACH

The primary goal of Newmont's BI&C program is to ensure that Newmont operates ethically in its dealings and is in compliance with all applicable laws and regulations where Newmont operates.

The program aims to achieve this through a focus on two interdependent areas – building a culture of business integrity and implementing effective compliance controls.

BUSINESS INTEGRITY CULTURE

Merging organizational values with employees' personal behaviors is crucial for sustaining and enhancing Newmont's culture of business integrity. To achieve this, we employ the following programs, tools and practices:

- **Leadership and setting the tone** – Company-wide, regional and site communications from Newmont's leadership team share selected instances of misconduct involving Newmont personnel and examples of what business integrity means in practice. Where relevant, messages from site General Managers up to the President and CEO highlight the Company's actions on misconduct, serving as clear statements that Newmont's Code equally applies to all, regardless of function, level or location.
- **Ongoing, direct communications** – BI&C communicates cases, lessons learned, trends and other areas of importance directly to employees. Our quarterly Organizational Justice and Integrity Dashboard (OJID) highlights key business integrity messages and sheds light on activities and aggregated Business Integrity Helpline metrics, including outcomes and disciplinary measures statistics. The OJIDs also share lessons learned from actual cases and periodically include sections aimed at demystifying Newmont's internal investigations process.
- **Training** – All employees and directors must acknowledge understanding of and adherence to our Code upon joining and annually. Employees with regular computer access at work must complete additional online courses on specific business integrity and compliance topics at least once a year. This is supplemented by tailored in-person, virtual and online training that addresses Code-related issues, region and/or function-specific issues and lessons learned from actual cases at Newmont.
- **Outreach** – BI&C conducts ongoing sessions with various functions to encourage ethical behavior, navigate compliance issues and prevent potential misconduct. For example, our local compliance managers host integrity days/weeks with relevant learning and awareness events.

- **Personnel management practices** – To set people up for success at the beginning of their careers with Newmont, new employees receive information on our business integrity approach during onboarding. Company values are discussed in leadership calls, performance evaluations and annual goal-setting meetings.
- **Celebrating exemplary behavior** – Through our annual business integrity award process, we recognize employees who demonstrate outstanding integrity-based behaviors. Recipients, nominated by peers, are selected for serving as role models for ethical decision making.

COMPLIANCE CONTROLS

Ensuring compliance with laws and regulations requires a robust system of checks and balances. Our controls, which reinforce our integrity culture, include:

- **Quarterly anti-corruption certification** – Each quarter, over 100 leaders across the business (i.e., all Executive Vice Presidents, Managing Directors, Regional Chief Financial Officers, site General Managers and leaders within key functions) personally certify that their respective region or functional area maintained effective controls for all aspects of their operations and that they are not aware of any violation of our Code, policies, standards or applicable laws not previously disclosed.
- **Proactive detection data analytics** – To proactively detect potentially suspicious transactions, we apply analytical filters that screen payments and flag any unusual transactions. This process helps detect and deter corruption. We currently employ this process in many of our higher-risk jurisdictions (e.g., Mexico, Peru, Argentina and Suriname) and will continue to expand as needed.
- **Third-party screening** – Our BI&C, Supply Chain, Information Technology and People teams work together to conduct third-party screening through a platform that screens adverse media, political exposure and trade compliance risks. All relevant findings are assessed and acted upon, as applicable, before advancing the third party through the onboarding process. The platform also includes a monitoring feature that flags any new alerts on previously screened third parties.
- **Supplier risk** – BI&C, Supply Chain and our Master Data teams work together to risk rank third parties conducting, or wishing to conduct, business with Newmont. This involves analyzing risk-profiling inputs provided by both the applicable Newmont business owners and the third parties. Those identified with a heightened risk profile are categorized as high-risk and undergo additional checks and mitigating measures led by BI&C. BI&C has the ability to halt business processes associated with a high-risk third party until the necessary mitigating actions are defined and/or in place.
- **Business Integrity Helpline** – People managers are expected to ask, listen and act, and all employees are encouraged to speak up in good faith and report any instances of real or potential breaches of the Code or related policies, standards and/or laws. Employees, contractors, suppliers, community members and others can anonymously seek guidance and/or report a concern through our third-party-run [Business Integrity Helpline](#) (available in English, Spanish, Dutch, French and Tok Pisin). Code-related cases that originate through other channels, such as the People or Security teams, are also incorporated into the Business Integrity Helpline, and matters that have a human rights impact are flagged as such. All substantiated matters lead to corrective actions, which may include a recommended process improvement, training, counseling, formal discipline, termination and/or legal action.
- **Employee performance and advancement** – Our People and BI&C teams collaborate on a formal process that screens employees who are being considered for management promotions or transfers for substantiated instances of misconduct. BI&C also provides input into the annual short-term incentive process by identifying employees with substantiated instances of misconduct. This information is considered in determining the incentives.
- **Gifts and entertainment registry** – Reasonable, transparent and appropriate gifts and entertainment are integral to doing business in many jurisdictions where we operate. To manage conflicts of interest and comply with applicable anti-corruption legislation and norms, our global gifts and entertainment registry assesses and, if applicable, approves gifts and entertainment given and received by employees above pre-determined thresholds.
- **Conflicts of interest disclosures** – Internal and external applicants to open positions at Newmont must disclose conflicts of interest and government/political exposure. Disclosures of concern are forwarded to BI&C for assessment and guidance, and they must be cleared by BI&C before advancing. Similarly, Newmont employees are required to avoid conflicts of interest; however, this may not be possible in some instances. To help employees comply, our global portal captures the disclosed conflict and manages it in a centralized and traceable manner. Employees are required to annually certify that they do not have any real, apparent or potential conflicts of interest.
- **Clarity and accessibility** – BI&C's intranet site, accessible to all employees, displays relevant integrity and compliance-related policies, standards and tools to support compliance. The portal also includes helpful training material and direct contact information for the global BI&C team.

- **Transparency and ongoing evaluation** – Quarterly reports to the Compliance Committee and the Board of Directors' Audit Committee provide comprehensive statistics, trends and benchmarks on Business Integrity Helpline activity, regulatory developments and compliance program progress.

PUBLIC POLICY ADVOCACY

Our participation in the public policy process supports responsible mineral development where we operate. We advocate for responsible, equitable and transparent policies at the local, national and international levels, aiming to contribute to solutions that affect our business.

To mitigate corruption risks with government officials, employees must secure prior approval and adhere to our global business integrity and compliance standards, all applicable laws, and external commitments (i.e., the [Partnering Against Corruption Initiative](#)) before engaging with government officials. Reports on our U.S. and Canadian lobbying activities are published [online](#).

We advocate our positions through our membership in associations and organizations that represent the interests of the mining industry and help shape regulations and policies. Annual assessments ensure alignment between our commitments and association positions, particularly around climate change. In cases of misalignment, we engage with the organizations to address gaps.

Political contributions

Newmont contributes to candidates and organizations in the U.S. whose views and likely actions align with our business goals. Newmont makes political donations only in the U.S. Contributions – whether direct or through our bipartisan political action committee called NEWPAC – adhere to our Political Contributions Standard and all applicable laws. Employee contributions to NEWPAC are voluntary and separate from company contributions. NEWPAC is registered with the U.S. Federal Election Commission (FEC), and its activities are publicly disclosed on the [FEC website](#).

We provide our Board of Directors with annual reports on political contributions and U.S. trade association memberships and publish this information on our [website](#).

PERFORMANCE, METRICS AND TARGETS

We measure the effectiveness of our approach to managing our business integrity and compliance risks by monitoring several metrics and performance objectives. Each year we disclose our performance in meeting these in our [Annual Sustainability Report](#).



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