



Updated March 2025

# Our Approach to Responsible Sourcing

Responsible mining includes consideration of social and environmental impacts throughout an operation's entire value chain. Newmont works with thousands of upstream suppliers and downstream customers – including direct suppliers, smelters and refineries worldwide – to implement due diligence practices that align with stakeholder expectations and demonstrate responsible business practices.

## RESPONSIBLE SOURCING STRATEGY

Our Responsible Sourcing Strategy focuses on the following objectives and desired outcomes:



**Operational performance reporting and independent assurance** – Demonstrate through credible data, performance indicators and assurance that our products were responsibly produced.



**Internal governance and capacity** – Ensure governance structure enables cross-functional coordination and effective implementation across the organization.

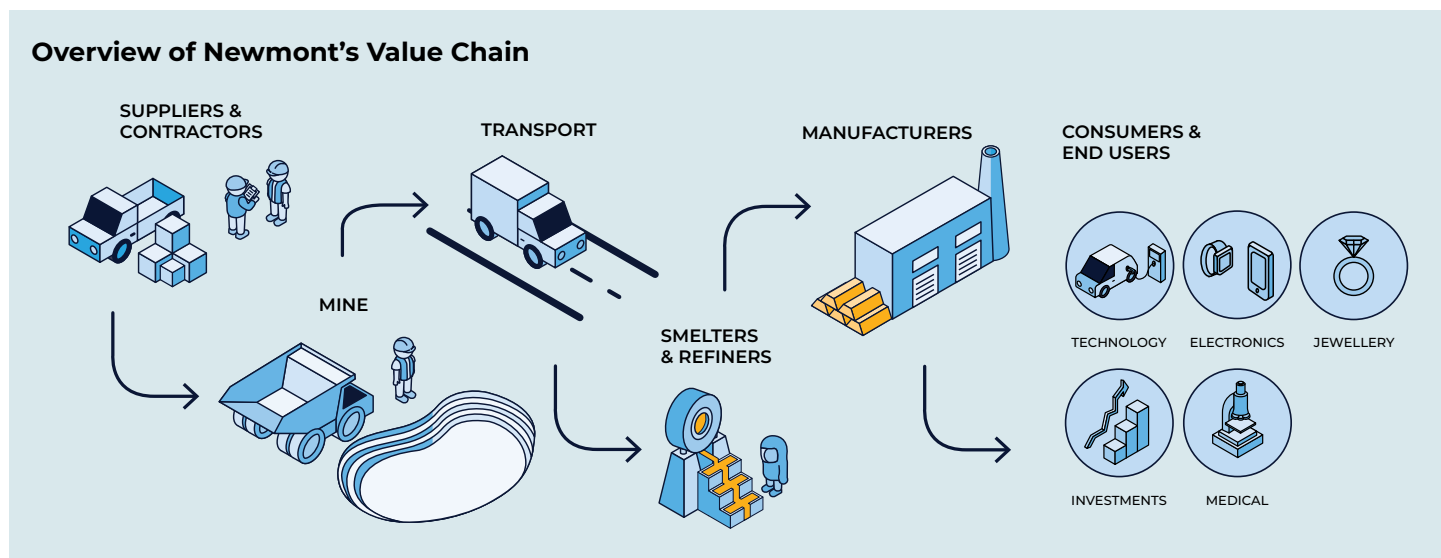


**Value chain management** – Conduct value chain due diligence and work with our business partners to identify, mitigate and remediate our most material risks and impacts.



**External engagement** – Support access to capital and markets through engagement that aligns external initiatives with Newmont's responsible sourcing approach.

To meet evolving stakeholder expectations, we continuously progress our responsible sourcing approach to identify and address risks throughout our value chain.



## PROCUREMENT

Understanding and responding to corruption, human rights, environmental, climate change and other risks across our global supplier network is essential. Our dedicated supplier risk strategies and programs help build our understanding of our suppliers and their activities and manage the related risks.

Our [Supplier Code of Conduct](#) establishes the minimum standards for responsible business conduct for those wishing to do business with or on behalf of Newmont. All suppliers and their subcontractors must adhere to our contract terms, including compliance with our [Code of Conduct](#), policies, standards and human rights clauses.

## SUPPLIER RISK MANAGEMENT PROGRAM

Our global Supplier Management Standard details the key components of our Supplier Risk Management (SRiM) program – working to support a consistent approach to managing supplier-related risks and performance across the business.

The SRiM process applies to all phases of the lifecycle for suppliers providing critical services or goods (e.g., construction, engineering, explosives, processing chemicals), with additional actions for suppliers identified as high risk. Suppliers receive pre-qualification questionnaires covering social, environmental, human rights, health and safety, ethics and compliance, security, and information technology risks. A tier risk rating is assigned based on a risk analysis of each scope of work. The supplier risk assessment determines the need for risk mitigation measures (e.g., training, additional contract clauses). During onboarding, suppliers also undergo prohibited party screening, which checks for sanctions, corruption, regulatory and law enforcement activity, and breaches related to financial, environmental and human rights matters. Suppliers are then continuously monitored for these risks.

As of the end of 2024, seven Newmont operating sites and the corporate office have fully implemented SRiM.

## SUPPLIER LIFECYCLE PROCESS



### GLOBAL SUPPLY CHAIN CONTINUITY

The Commercial function, which includes supply chain, sales and marketing, and logistics, conducts risk assessments to identify potential hazards, vulnerabilities and exposures within the function and associated operations. Activities include geopolitical, environmental, operational and regulatory risk considerations. Supply Chain disruption is mitigated through effective strategic sourcing, materials management planning and robust critical controls.

### SMELTING AND REFINING

Included in Newmont's value chain are "downstream" users that refine the metals and minerals we mine into finished products.

The gold we produce is transported as doré to refineries certified by the [London Bullion Market Association](#) (LBMA). The LBMA requires all members to comply with the [Responsible Gold Guidance](#) (RGG), an audited process based on the [Organisation for Economic Co-operation and Development \(OECD\) Due Diligence Guidance](#) that ensures precious metal materials are conflict-free. Many of the refineries we use also follow the [Responsible Minerals Initiative's](#) Responsible Minerals Assurance Process, which validates a smelter's or refinery's management processes for responsible mineral procurement through independent audits.

The copper, gold, lead, zinc and molybdenum concentrates that we produce are sold to smelters for further treatment and refining. Our concentrate sales contracts require compliance with permits, approvals and other laws. All concentrates sold by Newmont contain gold, and provisions within the concentrate sales contracts require the buyer to agree to our Conflict-Free Gold Standard or equivalent due diligence guidance. Most of our concentrates are sold directly to smelters with which we have long-term relationships. However, sales will also occasionally be made to independent trading companies.

We aim to reduce downstream impacts by conducting due diligence on new buyers, considering environmental, health and safety, technical and social criteria. Our sales agreements include provisions that address these areas of management and allow for due diligence, as well as audits, should we identify any concerns with a business partner.

We report annually on greenhouse gas emissions from our suppliers and customers as part of our Scope 3 emissions.

More information about our products is in our latest [Form 10-K](#). We also publish an annual [Conflict-Free Gold Report](#) aligned with the World Gold Council's Conflict-Free Gold Standard, confirming that the gold we produce does not contribute to unlawful armed conflict.



[newmont.com/sustainability](https://newmont.com/sustainability)