



2024 Conflict-Free Gold Report

May 2025

INTRODUCTION

Achieving Newmont Corporation's ("Newmont") purpose to create value and improve lives through sustainable and responsible mining requires us to demonstrate that our gold has been extracted in a manner that does not knowingly cause, support or benefit unlawful armed conflict or contribute to human rights abuses or breaches of international humanitarian law. Newmont takes this responsibility seriously and has implemented the World Gold Council's (WGC's) Conflict-Free Gold Standard (the "Standard") since 2013. Our commitment to the Standard is available on our [website](#). This Conflict-Free Gold Report summarizes how Newmont conformed to the requirements of the Standard for the calendar year ended December 31, 2024. The Chief Sustainability and Development Officer is responsible for overseeing implementation of the Standard and reports directly to the President and Chief Executive Officer, as well as provides regular updates to the Board's Safety and Sustainability Committee, which has ultimate responsibility for Newmont's compliance with the Standard.

REPORTING BOUNDARY

The reporting boundary of this Conflict-Free Gold Report includes all wholly owned operations and joint ventures where Newmont was the operator in the 2024 calendar year. Unless otherwise noted, Newmont's corporate offices, regional offices, exploration sites and legacy sites are not included in this report. A list of applicable Newmont operations is provided in Attachment A.

References to "Newmont," "the Company," "we" and "our" refer to Newmont Corporation (formerly Newmont Goldcorp Corporation and Newmont Mining Corporation) and/or where applicable our affiliates, joint ventures and subsidiaries covered by this report as detailed above.

NEWMONT'S EVALUATION

PART A - CONFLICT ASSESSMENT

In order to evaluate Part A of the Standard, Newmont conducted a review of international sanctions (including, but not limited to, the UN Security Council Consolidated Sanctions List and the U.S. Department of Treasury Office of Foreign Assets Control (OFAC) Sanctions List) to assess whether international sanctions have been imposed on the countries where we operate. We concluded that no applicable international sanctions have been imposed on the countries in which we had mining operations during the year ended December 31, 2024.

As part of the Conflict Assessment evaluation, Newmont also reviewed the Conflict Barometer published by the [Heidelberg Institute for International Conflict Research](#) to determine whether the area(s) in which our mines are located or our product is transported are classified as "conflict affected" or "high risk." The 2022 and 2023 Conflict Barometers were reviewed for the purpose of this report. Since the 2024 Barometer had not yet been released by the Heidelberg Institute at the



time of publication, the 2023 Barometer is considered the current version. According to the 2022 and 2023 Heidelberg Conflict Barometers, out of the countries in which Newmont has mining operations, Mexico and Papua New Guinea both ranked '4' (limited war) on a national level. Mexico was ranked a '4' because of drug cartel activities, including in the sub-national level where we operate. Papua New Guinea ranked '4' due to inter-community rivalries and political conflict. Newmont has mining operations in the New Ireland Province of Papua New Guinea and none of the conflicts were documented at the sub-national level in this province. Our Papua New Guinea Security team monitors security incidents throughout the country on an on-going basis, and particularly the Lihir island group, where we have also not identified these conflicts. As a result, Newmont undertook assessments of Parts B through E as set out in the Standard for our Peñasquito mine located in the State of Zacatecas, Mexico. However, we did not conduct this assessment for our Lihir mine in Papua New Guinea, as no conflicts were documented in New Ireland Province where we operate.

Additionally, through the assessment of Part C, the Philippines, which is a product receiving country, ranked '4' (limited war) in the 2022 Heidelberg Conflict Barometer. The Philippines is a final destination country for some of the product from our Boddington mine in Australia, and our Brucejack and Red Chris mines in Canada.

Other than Mexico and the Philippines, no other Newmont sites or receiving countries required further assessment under the Standard.

PART B - COMPANY ASSESSMENT

Part B of the Standard assesses whether the Company has the appropriate systems in place in order to discharge our corporate obligations and responsibilities, to avoid knowingly causing, supporting or benefiting unlawful armed conflict, or contributing to serious human rights abuses or breaches of international humanitarian law. In order to meet the requirements of Part B of the Standard, Newmont evaluated whether our policies, processes and procedures were adequate to ensure conformance with the Standard for the Peñasquito mine in Mexico. Based on the supporting evidence below, which includes examples of Newmont's commitments and practices, Newmont concluded that we are in conformance with the Standard.

Commitment to respecting human rights

- Our commitment to respecting human rights is outlined in our [Sustainability and Stakeholder Engagement Policy](#), and operationalized through our [Human Rights Standard](#) and its referenced systems and processes. See our website for more information on [Our Approach to Human Rights](#).
- Activities to mitigate Modern Slavery risks in our operations and supply chain are detailed in our annual Modern Slavery Statement. Our latest statement can be found [here](#).

Risk management

- Newmont's Geopolitical Risk Program (GRP) includes qualitative and quantitative risk ratings and access to near real-time global risk intelligence data through an external platform. Externally-generated geopolitical risk reports are shared quarterly, which assist



- in quantifying and assessing risks (including security risks) where Newmont operates and inform risk management and strategic decisions.
- The GRP has been integrated in to the Company's overarching Risk Management System to ensure enterprise-level political risks are managed in the business-wide risk and event reporting software platform and appropriate controls are developed and implemented. Mexico-specific risks are managed and reported at all levels of the Company, including the following:
 - The Board's Safety and Sustainability Committee receives regular updates regarding security, human rights and political developments globally, including Mexico.
 - Newmont's leadership team for the business unit overseeing Mexico reviews the country's most salient issues, including government relations and security, that require executive leadership's attention.
 - Cross-functional committees working with site leadership analyze socio-political, security and communications issues and develop management plans for identified risks.
 - In addition to the GRP described above and internal monitoring efforts, external risks in Mexico are monitored by two independent political risk consultants who advise the Company on emerging local, regional and country trends, and how the Company could be impacted. The consultants provide recommendations related to risks specific to the state of Zacatecas, where our Peñasquito mine is located, including recommendations around security measures during transfers by land (see Part C below for more information on controls related to transport risks).
 - Newmont's Internal Audit function also conducts periodic audits of internal controls to verify that the Company is effectively managing identified risks. Internal Audit conducted an audit of procurement controls and processes at Peñasquito in 2024. Part of this audit was to assess if controls were in place and effective in detecting red flags and in controlling the risk of payments to suppliers or third parties being made directly or indirectly to organized criminal groups.

Security

- Newmont has been a signatory to the Voluntary Principles on Security and Human Rights ("VPs") since 2004. Adherence to the VPs across our operations is a central part of our commitment to human rights, as outlined in our [annual report](#) to the Voluntary Principles Initiative.
- The Peñasquito Security Department monitors monthly key performance indicators for private security contractors in Mexico linked to VPs compliance.
- The Security Department tracks security guard training in Mexico, including training on the Voluntary Principles on Security and Human Rights, as well as evaluations and drills.
- A cross-functional group (including External Relations, Legal and Security) has been established in Mexico to monitor risks, including those associated with criminal activities supporting corruption and money laundering, and to put in place appropriate controls with suppliers and customers.



Payments and Benefits-in-kind

- Through our [Code of Conduct](#) and [Business Integrity Policy](#), as well as our membership in the World Economic Forum's [Partnering Against Corruption Initiative](#), we outline our commitments to integrity and doing business in a responsible way wherever we operate, including requirements for effectively managing the risks associated with government payments. Newmont provides online and in-person training for key employees and selected third parties on these commitments, including employees who have decision-making authority related to payments and in-kind donations.
- Our Conflict of Interest Standard requires employees to disclose all actual or potential conflicts of interest via an online platform once they join the Company and subsequently when any actual or potential conflict of interest arises.
- Our Anti-Corruption Standard prohibits improper payments to, and improperly influencing, government officials, as well as establishing different levels of approvals for providing anything of value to a government official.
- Our Gift Registry tracks gifts and entertainment that cross established thresholds received from and given to third parties, including government officials. To comply with Section 302 of the United States' Sarbanes-Oxley Act (SOX 302), specified senior business leaders provide quarterly certifications that the Company has maintained effective financial controls, and they are not aware of any interaction or payment by Newmont, or on Newmont's behalf, that would violate our Code of Conduct, policies, standards or applicable laws. Similar certifications are also completed by an additional number of leaders in higher risk functional areas.
- As an original signatory to the [Extractives Industries Transparency Initiative](#) ("EITI") in 2003, Newmont supports the program and advancing revenue transparency in EITI implementing countries where we operate.
- We publicly disclose payments to governments in our [Sustainability Report](#) and in our [Annual Taxes and Royalties Contribution Report](#), which details Newmont's significant economic contributions to host communities and governments globally. We also report publicly in accordance with the Canadian government's [Extractive Sector Transparency Measures Act \(ESTMA\)](#), which requires extractive companies operating in Canada to disclose specific in-kind and cash donations to government entities.
- At onboarding, third parties, such as beneficiaries of donations and commercial vendors go through a prohibited party screening that includes screening for sanctions (including United States and United Nations sanctions), corruption, regulatory and law enforcement activity, and other financial, environmental and human right breaches. Third parties continue to be regularly monitored for these risks.
- Our global Business Integrity & Compliance program promotes a culture of integrity and personal accountability by providing information and tools, including mandatory annual training to identify, evaluate, address and resolve situations in which potential ethical misconduct is involved.

Engagement, complaints and grievances

- Our [Stakeholder Relationship Management Standard](#) outlines the requirements for all sites to adequately identify and effectively engage local communities, and have appropriate



complaints and grievance mechanisms in place to address external stakeholder concerns in a timely and effective manner.

- Newmont's [Business Integrity Helpline](#) supports the identification of issues in breach of our commitments. The Helpline is made available in all Newmont working languages to employees, contractors and third parties and also allows for anonymous reporting.

PART C - COMMODITY ASSESSMENT

Part C of the Standard assesses the processes in place to manage the movement of gold and gold-bearing material while in the custody of the Company, so as to mitigate against the misuse of this material by groups associated with unlawful armed conflict. Newmont puts in place strict controls to reduce the risk of materials being misappropriated while on site or in transit.

At our Peñasquito mine in Mexico, we produce lead, zinc and silver concentrates, all of which contain gold. There are various controls in place to secure and manage the flow of gold-bearing materials (concentrate) as outlined below.

On-site controls

- We have documented the flow of concentrate while on site and have identified the risks and associated controls to minimize the likelihood of loss and/or theft of material.
- Controls include regulated entry and exit procedures in areas containing product, the recording of weights as material is moved through facilities, scheduled daily security patrols and required presence of facility supervisors.

Transport controls

- Trucks transporting concentrate travel during daytime hours in convoys with a security escort and include GPS tracking from the mine to the port. Truck beds are weighed, and weights are recorded and reconciled during each leg of transportation, including mine site, port facilities and receipt at smelter.
- Intelligence and due diligence work is undertaken on the providers and personnel who transport the materials from the mine and for the transportation routes. The intelligence and due diligence also include identifying potential issues on the route (including roadblocks) and evaluating the security of alternative routes.

In October 2024, a theft of concentrate occurred when product was in route from the Peñasquito mine to the port. The theft included six trailers of concentrate which were stolen. Following the theft incident, enhanced controls were implemented, and the federal government increased its focus on highway security within the state of Zacatecas.

We have also assessed the Company's custody and control during transport of our products where the destination countries have been identified as "conflict affected" or "high risk".

The Philippines, which the Heidelberg Conflict Barometer also rated as a '4' (limited war) in their 2022 report, is the final destination for our Boddington and Red Chris mines' copper concentrate and our gold concentrate from our Brucejack mine.



- For Boddington, Newmont transfers the risk of loss of this product upon loading the concentrate onto the vessel at the Port of Bunbury, Australia, and title passes upon the buyers' receipt of the shipping documents ('bill of lading'). This title transfer occurs a few days after the loading of the material and prior to the material's arrival in the Philippines.
- For Brucejack and Red Chris, Newmont transfers the risk of loss of this product upon loading the concentrate onto the vessel at the Port of Stewart, Canada. For both sites, the title transfers upon provisional payment from the buyer to Newmont, which depending on transit times and payment schedules, may occur during transit or after arrival.
- As the responsibility for the product transfers to the buyer when the product ships, we have assessed that Newmont meets the requirements of the Standard.

PART D - EXTERNALLY SOURCED GOLD ASSESSMENT

All Newmont sites are reviewed to determine if they source gold or gold-bearing material from external suppliers. To confirm from each site if there has been any externally sourced gold, each business unit completes an internal Conflict-Free Gold Assessment form for all products, which includes details of the products' value chains. Where gold has been externally sourced, supporting documentation, such as payment verification, custody transfers and other related evidence are required to be reviewed. The completed assessments are signed and certified by business unit leadership. We confirm that none of Newmont's mines were found to have sourced gold from external suppliers during the year ended December 31, 2024.

PART E – MANAGEMENT STATEMENT OF CONFORMANCE

Newmont Corporation confirms, to the best of our knowledge, that the gold and gold-bearing material produced by Newmont-operated mines in the United States (CC&V), Peru (Yanacocha), Suriname (Merian), Ghana (Ahafo South and Akyem), Canada (Brucejack, Éléonore, Musselwhite, Porcupine and Red Chris), Argentina (Cerro Negro), Mexico (Peñasquito), Australia (Boddington, Cadia and Tanami) and Papua New Guinea (Lihir) does not, in any way, knowingly contribute to armed conflict or human rights abuses or breaches of international humanitarian law as per the World Gold Council's Conflict-Free Gold Standard ("the Standard").

We believe that the mining operations covered in this report have the appropriate systems and controls in place to conform to the World Gold Council's Conflict-Free Gold Standard. The Company's Conflict-Free Gold report for the year ended December 31, 2024, was subject to independent limited assurance. Nothing has come to our attention to indicate any non-conformance since that date.

This Statement of Conformance is provided by Newmont Corporation as part of the conformance requirements for the World Gold Council's Conflict-Free Gold Standard and to provide good faith representation to the next participant in the chain of custody.

INDEPENDENT ASSURANCE

PricewaterhouseCoopers (PwC) conducted limited assurance for the reporting year ended December 31, 2024, in accordance with the Conflict-Free Gold Standard – Guidance for Assurance Providers (October 2012).



PwC's assurance for Newmont's 2024 Conflict-Free Gold Report is reflected in the [Independent Limited Assurance Report](#).

If users of this report wish to provide any feedback to Newmont with respect to the Conflict-Free Gold Report, they can contact globalcommunications@newmont.com.



ATTACHMENT A - NEWMONT OPERATIONS INCLUDED IN THIS REPORT

Newmont Corporation's Conflict-Free Gold Report includes the following mines¹:

- Ahafo South (Brong Ahafo Region, Ghana)
- Akyem (Eastern Region, Ghana)
- Boddington (Western Australia, Australia)
- Brucejack (British Columbia, Canada)
- Cadia (New South Wales, Australia)
- Cerro Negro (Santa Cruz, Argentina)
- Cripple Creek & Victor (Colorado, United States)
- Éléonore (Quebec, Canada)
- Lihir (New Ireland, Papua New Guinea)
- Merian (Suriname)
- Musselwhite (Ontario, Canada)
- Peñasquito (Zacatecas, Mexico)
- Porcupine (Ontario, Canada)
- Red Chris (British Columbia, Canada)
- Tanami (Northern Territory, Australia)
- Yanacocha (Cajamarca, Peru)

This report does not cover exploration sites or projects under development.

¹ As [announced](#) on April 16, 2025, Newmont has completed the sale of its non-core operating assets, with the Coffee development project remaining designated as held for sale. Refer to the press release available on the Company's website.