

# Respecting Human Rights: Our Approach

MAY 2020





## Message from Stephen Gottesfeld

EXECUTIVE VICE  
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We are living in unprecedented times. The global response to COVID-19 has raised human rights dilemmas for governments in terms of when individual rights can be limited for the greater safety of populations. Companies will also be scrutinized for their response — how do they respect the human rights of their workforce and local communities in contexts where it is no longer possible to operate under a ‘business as usual’ model?

Respecting human rights means addressing risks to people. Never in the company’s history has this been more relevant than today. Our approach, to embed respect for human rights throughout our work, is central to delivering on our purpose to create value and improve lives through sustainable and responsible mining. Embedding this respect takes many forms: having appropriate governance and policies in place, undertaking human rights due diligence in line with the UN Guiding Principles on Business and Human Rights (“Guiding Principles”), putting in place effective complaints and grievance mechanisms and being transparent about human rights issues and performance. This guide provides more detail on many of these aspects.

I have overall responsibility for the way in which we address human rights concerns, and I report directly to the Chief Executive Officer, ensuring that human rights issues are visible at the highest level of the organization. Day-to-day management of human rights resides with one of my team members – the Senior Vice President for External Relations and Social Responsibility. Our Executive Leadership Team is accountable for performance in this area and provides oversight and input.

Ownership and accountabilities for performance and compliance with our Human Rights Standard also reside in other functions and throughout our operating regions. For example, our human resources department helps us deliver on our commitment to respect employees’ rights to freedom of association and collective bargaining and implements the standards that prohibit the use of child, forced or bonded labor and enforce nondiscriminatory treatment in employment. Our legal department is responsible for the contract clauses that manage supplier risk, and a range of other departments support our commitment to respecting the human rights outlined in the Universal Declaration of Human Rights, including the right to water.

Health, safety and sustainability metrics represent 30 percent of our company’s short-term incentive plan. The sustainability metrics include how we score on a number of Environmental, Social and Governance (“ESG”) indices including the Dow Jones Sustainability Index, which incorporates human rights indicators. We see these as a proxy for human rights performance as assessed by an independent third party.

Implementing our human rights program is grounded in our commitment to the Guiding Principles. We have more to do in bolstering our understanding of how our activities, and the activities of those working on our behalf, can negatively and positively impact human rights. We remain committed to continuous improvement in this area and are learning what this means as the complexity of our operating context increases.



## Overview

We recognize our activities throughout the mine lifecycle have the potential to affect people's rights. Our commitment to managing these risks includes minimizing impacts while contributing toward strengthening and empowering employees, contractors, suppliers and host communities. We respect the rights, cultures, customs and values of the people and organizations living near our activities and working on our behalf, and those impacted by our activities.

### UNITED NATIONS GLOBAL COMPACT AND U.N. GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS

Newmont is a participant in the United Nations Global Compact, which promotes responsible corporate citizenship and a collaborative approach to forging a more sustainable and inclusive global economy. We have committed to implementing the Guiding Principles and have embedded their due diligence requirements into the way we work.

The Guiding Principles provide clarity on the first two principles of the United Nations Global Compact that address businesses' responsibility to respect human rights. Unanimously endorsed by the UN Human Rights Council in 2011, the Guiding Principles are a global standard that defines the duties of states to protect human rights and the responsibilities of companies to respect human rights.



Both states and business have obligations to provide adequate remedies if human rights abuses occur. Widely endorsed and adopted by governments, companies and Non-Governmental Organizations ("NGOs"), the Guiding Principles outline the standard for preventing and addressing human rights impacts linked to business activities.

In 2015, we elevated our commitment to human rights by becoming one of the first six global companies – and the first in the mining industry – to adopt the UN Guiding Principles Reporting Framework.



## Policies and Governance

In line with the Guiding Principles, our Code of Conduct ("Code") – which states our commitment to respect and promote the human rights of all people – serves as the foundation of a governance framework that supports implementation of our human rights strategy.

In 2014, we began to formalize our approach to human rights with an explicit commitment in our Sustainability and Stakeholder Engagement Policy to respect the dignity, wellbeing and human rights of employees and the communities in which we operate, as well as others affected by our operations.

The Policy was approved by the Board's Safety and Sustainability Committee and we continue to align our commitment to international standards.



# Human Rights and Other Related Standards

Supporting this commitment is our Human Rights Standard, which details the minimum requirements to which all of our sites must adhere. It includes mechanisms for monitoring our performance related to human rights risks. A number of other Newmont global standards address human rights risks in areas such as the protection of cultural resources, security at our operations, engagement with indigenous peoples, relocation, and disruption of livelihoods.

Our Human Rights Standard was first published in 2014 following consultation with a targeted group of external stakeholders; a pilot of the standard in two of our operating regions – Ghana and Peru; and an extensive internal review and approval process across regions, functions and management levels, including the executive leadership team, with targeted input from our Board of Directors. In 2018, we updated the standard to incorporate lessons learned since implementing the standard and to reflect key international developments in the human rights space.

The updated standard is available on both our internal and external websites, making it accessible to employees and external stakeholders, including community members who reside near our operations and activities.

In addition to our Human Rights Standard, we have other standards and strategies that address specific stakeholders who may be especially vulnerable to mining activities. For example, indigenous peoples have unique rights, culture, and history and may have distinct interests and concerns that differ from, or are in addition to, those of other stakeholder groups. For this reason, we have an Indigenous Peoples Standard that outlines our commitments in this area.

Another potentially vulnerable group is human rights defenders who have gained international attention given the increasing number of attacks against them in recent years. Our core values of integrity and responsibility support our commitment to respect human rights defenders, and we do not condone any form of attack against them or anyone who opposes our activities. We also expect our business partners not to condone such attacks. While we may not always agree with positions taken by human rights defenders, we believe an active and open civil society, supported by the rule of law, is essential.

## ALL OF OUR SOCIAL AND ENVIRONMENTAL STANDARDS ARE PUBLICLY AVAILABLE ON OUR WEBSITE AS BELOW:

- [Air Emissions Management Standard](#)
- [Biodiversity Management Standard](#)
- [Closure and Reclamation Standard](#)
- [Community Investment and Development Standard](#)
- [Cultural Resource Management Standard](#)
- [Hazardous Materials Management Standard](#)
- [Indigenous Peoples Standard](#)
- [Land Acquisition and Involuntary Resettlement Standard](#)
- [Local Procurement and Employment Standard](#)
- [Social Baseline and Impact Assessment Standard](#)
- [Stakeholder Relationship Management Standard](#)
- [Tailings and Heap Leach Facility Standard](#)
- [Waste Management Standard](#)
- [Waste Rock and Ore Stockpile Management Standard](#)
- [Water Management Standard](#)
- [Conflict-Free Gold Standard](#)



## Assessing Human Rights Risks

All sites must maintain processes to identify, integrate and manage human rights risks on an ongoing basis. For new projects or significant changes to existing operations, sites shall integrate an evaluation of human rights into their assessments (social impact assessments, risk assessments, etc.) and should consider undertaking standalone human rights impact assessments ("HRIAs") under certain circumstances (as outlined in our Human Rights Standard).

In line with our Social Baseline and Impact Assessment Standard, social impact assessments ("SIAs") at each operating site will be updated no less than every five years and include human rights considerations. Newmont built human rights into our global Integrated Management System ("IMS"), which provides a common platform for all sites to track complaints, community engagements, events and risks.





## Managing Supply Chain Risks

Our vast, complex global supply chain provides goods and services throughout the mine lifecycle. We recognize that this complexity exposes us to certain risks – including those with the potential to impact human rights. To manage these risks, we set out clear expectations for our suppliers in our Supplier Code of Conduct (“Supplier Code”), which is publicly available on our website, and supplier contracts include language requesting suppliers’ acknowledgment of the Supplier Code.

We are also implementing a robust Supplier Risk Management program, which integrates human rights risk evaluations and considerations into key stages of the supplier lifecycle including pre-qualification, scope of work risk assessments, ongoing supplier management and closeout. We have developed a supplier human rights training program, which has been utilized by suppliers in Peru, Ghana, Suriname and Australia. We also piloted a human rights supplier audit program, which, with some adaptations needed in light of our COVID-19 response, will be rolled out further in 2020. This year, we have updated our Modern Slavery Statement, which details the actions we are taking to address modern slavery risks in our own operations and supply chain.





## Using Leverage With Business Partners

Our Modern Slavery statement details how we reinforce our commitments and use our leverage with business partners when possible. We reinforce our standards, even if they go beyond host country legislation. An example of this is our work with the government of Suriname and the Pamakan people to get Free, Prior and Informed Consent before we proceeded with exploration activities while respecting their traditional land rights.

*For more information about our supplier risk management program and Modern Slavery statement, please visit our website. Our sustainability report, Beyond the Mine, includes more information about our supplier training and audits.*





## Training

Through training, we educate and raise awareness about each employee's responsibility concerning human rights. Since our online training program was first rolled out in 2018, it has been taken approximately 3,500 times. Employees with company email access are also required to complete online Ethics training on the following topics: conflicts of interest, the importance of speaking up, Newmont's Code, business integrity and anti-corruption. Participation rates in these programs was approximately 92% in 2019.

In addition to our online training, we carry out a number of targeted human rights training with employees and external stakeholders in the countries where we operate. This helps us meet a commitment in our Stakeholder Relationship Management Standard for developing culturally appropriate engagement mechanisms and enables us to make human rights relevant to the operating context while promoting our human rights commitments in an accessible way.

One example of in-person training is in Suriname, where we promoted our commitments through training with the representatives from the Community Development Foundation, the Pamaka Sustainable Development Committee which monitors the implementation of our Cooperation Agreement with the Pamakans and a group of Artisanal and Small Scale miners based near our operation. We also trained 21 suppliers there through a face-to-face training on our commitments and key labor rights. We continue to explore ways to promote our commitments while the COVID situation prevents in-person trainings.

# Complaints and Grievance Mechanisms

There are three primary ways that internal and external stakeholders can raise issues related to human rights:

1. Internal discussions with human resources – an internal process for workers to file grievances and complaints either through their manager or a human resources representative;
2. Complaints and grievances mechanisms and registers – an operational-level mechanism that is required at all sites to address external stakeholder concerns in a timely and effective manner to avoid conflict and build trust; and
3. The Integrity Help Line – a confidential channel for workers and external stakeholders to report any concern about compliance with our Code, including potential human rights issues.

In line with the Guiding Principles, we continuously incorporate feedback and input into our site-level complaints and grievance mechanism from those who experience the mechanism firsthand. While the overall design of the mechanism is set forth in our standards, each site must adapt the mechanism to its specific cultural and social context to ensure the mechanism is available and responsive to local communities.

We have a public commitment to close tier one complaints received by our local level complaints and grievance mechanisms within 30 days. Every case received by our Integrity Help Line is different and, depending on how complex the issue, internal investigations may vary in length. However, we try to close each case within 40 days.

Newmont's three-tier complaint and grievance mechanism provides complainants with a communication pathway to the company, and ensures that stakeholders have access to other mechanisms via third-party facilitators or judicial means. Using our complaints and grievance mechanism does not prevent complainants from accessing other remediation processes including state-based judicial or non-judicial mechanisms or other available mechanisms. We will collaborate with these to ensure a fair resolution of issues.

We have participated in other remediation processes as early as 2005 when we made an explicit commitment in Ghana to work with the Commission on Human Rights and Administrative Justice ("CHRAJ") to resolve disputes. Other work with CHRAJ included

addressing perceptions of water contamination that resulted in the construction of boreholes for drinking water and perceived impacts on farm products which resulted in compensation.

In Peru, we have worked with the International Finance Corporation ("IFC") Compliance Advisor Ombudsman ("CAO") over many years in relation to complaints filed about environmental and health impacts related to the mine.

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<sup>1</sup> [https://s24.q4cdn.com/382246808/files/doc\\_downloads/operations\\_projects/africa/documents/Guide\\_to\\_LACE\\_Activities\\_Ahafo\\_South\\_Project\\_0.pdf](https://s24.q4cdn.com/382246808/files/doc_downloads/operations_projects/africa/documents/Guide_to_LACE_Activities_Ahafo_South_Project_0.pdf)



# Stakeholder Engagement

Our standards require that information be made available to stakeholders in a culturally appropriate way as follows:

- Necessary and relevant site information shall be identified and made available to stakeholders in a culturally appropriate manner to create an informed engagement process (Stakeholder Relationship Management Standard)
- A culturally appropriate and independently verified interpretation of the environmental and social impact assessment shall be prepared and communicated to affected stakeholders. (Social Baseline and Impact Assessment Standard)

Engaging with community members and others affected by our activities on an ongoing basis is essential for maintaining support for our activities. In addition to this ongoing engagement, a number of our standards include requirements around triggers for engagement and for monitoring the effectiveness of engagement. These include:

- Involving affected communities in baseline assessments and social impact assessments at the exploration phase and prior to initiation of site alternatives analysis and updating these studies every five years or more frequently as needed (Social Baseline and Impact Assessment Standard)
- Measuring the effectiveness of stakeholder engagement (no less than annually) (Stakeholder Relationship Management Standard)
- Conducting perception surveys (at least every three years) (Stakeholder Relationship Management Standard)

We conduct ad hoc engagements around potential human rights incidents, such as involving community members in emergency response simulations.

We make sure our complaints and grievance mechanisms are accessible to local communities by providing clear guidance on how they can be accessed. The image below shows an example of a poster from Suriname in this regard.







## Tracking Effectiveness

To track the effectiveness of actions related to identifying human rights risks and impacts, we carried out audits on our human rights standard in Ghana, Suriname and Australia in 2019. Our audit results concluded that better integration was needed. Suriname and Ghana can do more to explicitly integrate human rights into site risk assessments and improvements are needed in Ghana to consider human rights in social impact assessments and complaints and grievance mechanisms.

Our Modern Slavery Statement also provides details of our supplier human rights audit program and the way we track performance through our complaints and grievance mechanisms.





## Accountability

Accountability for our human rights performance ultimately resides with our Executive Leadership Team, with oversight and strategic input provided by our Board of Directors. Regional Vice Presidents ensure sites operate in a manner that respects human rights and in compliance with all laws, regulations, policies and standards related to human rights. Our cross-functional human rights working groups at the corporate and regional/ site levels monitor compliance with the human rights standard and implementation of the human rights management plans. All regions are required to have working groups with cross-functional accountability for human rights risk management.

In 2016, we integrated human rights due diligence into our risk management approach so leaders and the Board's Safety and Sustainability Committee are updated as often as needed on key risks. Senior management and the Safety and Sustainability Committee regularly review and discuss human rights topics, such as compliance with global standards, training and escalated complaints – including land disputes, security forces, community interactions and others – with potential human rights implications.

## Salient Human Rights Risks

As early adopters of the UN Guiding Principles Reporting Framework, in 2015 we engaged internally across regions and functions and externally with human rights experts and key stakeholders to identify our top salient human rights issues. We held a cross-functional corporate workshop to identify an initial set of potential human rights issues, which was followed by sessions with regional and site teams to determine the severity and likelihood for each issue.

In 2018, we reviewed and refreshed our salient human rights issues. Furthermore, we discuss our performance and approach to managing each of these risks in Beyond the Mine. The following table shows our salient human rights risks, relevant standard and mitigation measures and some examples of concerns related to the salient risks.





# Salient Human Rights Risks

## RIGHT TO LIFE

<p><b>NEWMONT'S SALIENT HUMAN RIGHTS RISKS AND DESCRIPTION OF RELEVANCE TO NEWMONT</b></p>	<p><b>Right to Life</b></p> <p>Entails the right not to be deprived of life arbitrarily or unlawfully, and the right to have one's life protected.</p>
<p><b>RELEVANT POLICIES/STANDARDS</b></p>	<ul style="list-style-type: none"> <li>• Health and Safety Policy</li> <li>• Fatality Risk Management standards</li> <li>• Emergency Preparedness and response Standard</li> <li>• Tailings and Heap Leach</li> <li>• Management Standard</li> <li>• Cyanide Code</li> <li>• Water management standard</li> </ul>
<p><b>EXAMPLES OF MITIGATION MEASURES AND STAKEHOLDER ENGAGEMENT</b></p>	<ul style="list-style-type: none"> <li>• Health and Safety critical controls and audits</li> <li>• Enterprise Risk Management system</li> <li>• Occupational health and safety training</li> <li>• Voluntary Principles training for security providers</li> <li>• Tailings and Water Management Plans</li> <li>• Rapid Response System</li> <li>• Participation and leadership in industry initiatives around zero harm and zero fatalities</li> <li>• Training and exercises to look at emergency response during hypothetical failure situations (cyanide and tailings)</li> </ul>
<p><b>EXAMPLES OF STAKEHOLDER CONCERNS RELATED TO SALIENT RISKS</b></p>	<p>Population influx as a result of new project developments increasing potential diseases and putting pressure on health care facilities, potentially leading to fatalities</p>
<p><b>EXAMPLES OF ACTIONS TAKEN TO ADDRESS CONCERNS</b></p>	<p>Provision of social infrastructure and services (education, health, water and sanitation)</p> <p>Population influx action plans</p>
<p><b>LEAD FUNCTIONS</b></p>	<p>All Functions</p>
<p><b>POTENTIALLY IMPACTED RIGHTS HOLDERS</b></p>	<ul style="list-style-type: none"> <li>✓ Employees</li> <li>✓ Suppliers/Coworkers</li> <li>✓ Local Communities</li> <li>✓ Vulnerable/Marginalized Groups</li> </ul>

# Salient Human Rights Risks

## RIGHT TO WATER AND SANITATION

<p><b>NEWMONT'S SALIENT HUMAN RIGHTS RISKS AND DESCRIPTION OF RELEVANCE TO NEWMONT</b></p>	<p><b>Right to water and sanitation</b></p> <p>Recognized as a separate right in 2010. Requires that water supply for each person is: sufficient to meet basic needs, safe and acceptable (all water facilities and services must be culturally appropriate and sensitive to gender, lifecycle and privacy requirements), physically accessible.</p>
<p><b>RELEVANT POLICIES/STANDARDS</b></p>	<ul style="list-style-type: none"> <li>• Sustainability and Stakeholder Engagement Policy</li> <li>• Water Management Standard</li> <li>• Global Water Strategy</li> <li>• Climate Adaptation Guidance</li> </ul>
<p><b>EXAMPLES OF MITIGATION MEASURES AND STAKEHOLDER ENGAGEMENT</b></p>	<ul style="list-style-type: none"> <li>• Environmental baseline studies and impact mitigation plans</li> <li>• Spill prevention and control</li> <li>• Engineering water management controls (diversion channels, water treatment, sediment control structures)</li> <li>• Climate Adaptation Action Plans</li> <li>• Water Management Plan, Site Charters and Action Plans</li> <li>• Local and national government engagement on community water programs</li> <li>• ICMM engagement on water issues</li> <li>• Partnership with Project WET</li> <li>• Engagement with watershed management forums</li> </ul>
<p><b>EXAMPLES OF STAKEHOLDER CONCERNS RELATED TO SALIENT RISKS</b></p>	<p>Dust caused by speeding of contractors resulting in impacts on water sources</p>
<p><b>EXAMPLES OF ACTIONS TAKEN TO ADDRESS CONCERNS</b></p>	<p>Contractor engagement and use of different trucks that generate less dust</p>
<p><b>LEAD FUNCTIONS</b></p>	<p>Environment</p>
<p><b>POTENTIALLY IMPACTED RIGHTS HOLDERS</b></p>	<ul style="list-style-type: none"> <li>☑ Employees</li> <li>☑ Suppliers/Coworkers</li> <li>☑ Local Communities</li> <li>☑ Vulnerable/Marginalized Groups</li> </ul>



# Salient Human Rights Risks

## RIGHT TO ADEQUATE STANDARD OF LIVING

NEWMONT'S SALIENT HUMAN RIGHTS RISKS AND DESCRIPTION OF RELEVANCE TO NEWMONT	<b>Right to adequate standard of living</b> Includes adequate food, clothing, housing and continuous improvement of living conditions.	
RELEVANT POLICIES/STANDARDS	<ul style="list-style-type: none"> <li>• Sustainability and Stakeholder Engagement Policy</li> <li>• Employment Standard</li> <li>• Compensation &amp; Benefits Standard</li> <li>• Non-Discrimination Standard</li> <li>• Local Procurement and Employment Standard</li> </ul>	
EXAMPLES OF MITIGATION MEASURES AND STAKEHOLDER ENGAGEMENT	<ul style="list-style-type: none"> <li>• Environmental, health, and social baselines and impact assessments</li> <li>• Local and Indigenous employment and procurement targets</li> <li>• Community investment strategies</li> <li>• Community foundations</li> <li>• Engagement with local governments and community stakeholders</li> </ul>	
EXAMPLES OF STAKEHOLDER CONCERNS RELATED TO SALIENT RISKS	Structural damage related to blasting complaints	
EXAMPLES OF ACTIONS TAKEN TO ADDRESS CONCERNS	Joint Company-Community-District Assembly committees for engagement and resolution planning	
LEAD FUNCTIONS	Sustainability & External Relations / Human Resources	
POTENTIALLY IMPACTED RIGHTS HOLDERS	<input checked="" type="checkbox"/> Employees <input checked="" type="checkbox"/> Suppliers/Coworkers <input checked="" type="checkbox"/> Local Communities <input checked="" type="checkbox"/> Vulnerable/Marginalized Groups	

# Salient Human Rights Risks

## RIGHT TO ENJOY JUST AND FAVORABLE CONDITIONS OF WORK

NEWMONT'S SALIENT HUMAN RIGHTS RISKS AND DESCRIPTION OF RELEVANCE TO NEWMONT	<b>Right to enjoy just and favorable conditions of work</b> Remuneration must be enough to provide workers with a decent living for themselves and their families. This includes a right to healthy and safe conditions of work, a right to equality of opportunity for promotion, and a right to rest, leisure and holidays as part of conditions at work.	
RELEVANT POLICIES/STANDARDS	<ul style="list-style-type: none"> <li>• Health and Safety Policy</li> <li>• Fatality Risk Management standards</li> <li>• Local Procurement and Employment Standard</li> </ul>	
EXAMPLES OF MITIGATION MEASURES AND STAKEHOLDER ENGAGEMENT	<ul style="list-style-type: none"> <li>• Safety Leadership Coaching program</li> <li>• Vital Behaviors program</li> <li>• Personal safety plans</li> <li>• Chemical management plans</li> <li>• On-site healthcare clinics</li> <li>• Lagging/leading indicators</li> <li>• Occupational health and safety training</li> <li>• ICMM's Mining Safety Roundtable</li> <li>• United States National Mining Association's regional health and safety programs</li> <li>• Engagement with other regional associations</li> </ul>	
EXAMPLES OF STAKEHOLDER CONCERNS RELATED TO SALIENT RISKS	Not enough local employment opportunities	
EXAMPLES OF ACTIONS TAKEN TO ADDRESS CONCERNS	Encouraging business partners to recruit local people through criteria in tenders, promotion of alternative livelihood opportunities, training programs for employable skills	
LEAD FUNCTIONS	Health and Safety	
POTENTIALLY IMPACTED RIGHTS HOLDERS	<input checked="" type="checkbox"/> Employees <input checked="" type="checkbox"/> Suppliers/Coworkers <input type="checkbox"/> Local Communities <input type="checkbox"/> Vulnerable/Marginalized Groups	



# Salient Human Rights Risks

## DISCRIMINATION IN EMPLOYMENT/OCCUPATION

<p><b>NEWMONT'S SALIENT HUMAN RIGHTS RISKS AND DESCRIPTION OF RELEVANCE TO NEWMONT</b></p>	<p><b>Discrimination in employment/occupation</b></p> <p>Discrimination in employment and occupation means treating people differently and less favorably because of characteristics that are not related to their merit or the requirements of the job.</p>
<p><b>RELEVANT POLICIES/STANDARDS</b></p>	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• People Policy</li> <li>• Employment Standard</li> <li>• Standard of Conduct and Non-Discriminatory Treatment in Employment Standard</li> <li>• Supplier Code of Conduct</li> </ul>
<p><b>EXAMPLES OF MITIGATION MEASURES AND STAKEHOLDER ENGAGEMENT</b></p>	<ul style="list-style-type: none"> <li>• Integrity Help Line</li> <li>• Online Ethics trainings</li> <li>• In-person training on discrimination, harassment and retaliation topics</li> <li>• Engagement with suppliers on anti-discrimination requirements</li> </ul>
<p><b>EXAMPLES OF STAKEHOLDER CONCERNS RELATED TO SALIENT RISKS</b></p>	<p>Company's systems and processes are a barrier for inclusive employment</p>
<p><b>EXAMPLES OF ACTIONS TAKEN TO ADDRESS CONCERNS</b></p>	<p>Employment pathways specific to local Indigenous people and the availability of scholarships through tertiary institutions</p>
<p><b>LEAD FUNCTIONS</b></p>	<p>Human Resources / Legal</p>
<p><b>POTENTIALLY IMPACTED RIGHTS HOLDERS</b></p>	<ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Employees</li> <li><input checked="" type="checkbox"/> Suppliers/Coworkers</li> <li><input type="checkbox"/> Local Communities</li> <li><input type="checkbox"/> Vulnerable/Marginalized Groups</li> </ul>

# Salient Human Rights Risks

## RIGHT TO HEALTH

<p><b>NEWMONT'S SALIENT HUMAN RIGHTS RISKS AND DESCRIPTION OF RELEVANCE TO NEWMONT</b></p>	<p><b>Right to health</b></p> <p>Refers to the right to the highest attainable standard of physical and mental health. People must have access to the underlying building blocks of good health, such as adequate nutrition, housing, safe and potable water, adequate sanitation, medical supplies, healthy working conditions and a healthy environment.</p>
<p><b>RELEVANT POLICIES/STANDARDS</b></p>	<ul style="list-style-type: none"> <li>• Occupational Health and Wellness Standard</li> <li>• Hazardous Materials Management Standard</li> <li>• International Cyanide Management Code</li> </ul>
<p><b>EXAMPLES OF MITIGATION MEASURES AND STAKEHOLDER ENGAGEMENT</b></p>	<ul style="list-style-type: none"> <li>• Health risk assessments</li> <li>• Critical control management plans</li> <li>• Nutrition and exercise education</li> <li>• "Fit-for-duty" programs</li> <li>• On-site healthcare clinics</li> <li>• Health impact assessments</li> <li>• Partnership with project C.U.R.E.</li> <li>• Wellness programs</li> <li>• Engagement with communities on health issues</li> <li>• Engagement with government on improving local health services</li> <li>• Engagement with local health care providers around project C.U.R.E. deliveries and assessments</li> <li>• Engagement with the International Cyanide Management Institute to establish critical controls for protecting workers from exposure</li> </ul>
<p><b>EXAMPLES OF STAKEHOLDER CONCERNS RELATED TO SALIENT RISKS</b></p>	<p>Concerns about cyanide's impact on health</p>
<p><b>EXAMPLES OF ACTIONS TAKEN TO ADDRESS CONCERNS</b></p>	<p>Third party compliance with International Cyanide Code, cyanide management plans, and public posting of all audit documents.</p> <p>Multi-company identification and verification of critical controls to prevent catastrophic spills.</p>
<p><b>LEAD FUNCTIONS</b></p>	<p>Human Resources / Legal</p>
<p><b>POTENTIALLY IMPACTED RIGHTS HOLDERS</b></p>	<ul style="list-style-type: none"> <li>☑ Employees</li> <li>☑ Suppliers/Coworkers</li> <li>☑ Local Communities</li> <li>☑ Vulnerable/Marginalized Groups</li> </ul>



# Salient Human Rights Risks

## RIGHT NOT TO BE SUBJECT TO SLAVERY OR FORCED LABOR

<p><b>NEWMONT'S SALIENT HUMAN RIGHTS RISKS AND DESCRIPTION OF RELEVANCE TO NEWMONT</b></p>	<p><b>Right not to be subject to slavery or forced labor</b></p> <p>Slavery occurs when one human being effectively owns another. The right to freedom from servitude covers other forms of dominance, egregious economic exploitation, and degradation of human beings.</p>
<p><b>RELEVANT POLICIES/STANDARDS</b></p>	<ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• People Policy</li> <li>• Human Rights Standard</li> <li>• Employment Standard</li> <li>• Supplier Code of Conduct</li> </ul>
<p><b>EXAMPLES OF MITIGATION MEASURES AND STAKEHOLDER ENGAGEMENT</b></p>	<ul style="list-style-type: none"> <li>• Impact and risk assessments</li> <li>• Complaints and grievance mechanisms</li> <li>• Supplier contract clauses on human rights</li> <li>• Participation in cross-industry initiatives on human rights (e.g. BSR)</li> <li>• Engagement with suppliers on Supplier Code of Conduct</li> <li>• Engagement with external experts on Modern Slavery issues</li> </ul>
<p><b>EXAMPLES OF STAKEHOLDER CONCERNS RELATED TO SALIENT RISKS</b></p>	<p>Government concerns around modern slavery issues in global supply chains (e.g. Australia)</p>
<p><b>EXAMPLES OF ACTIONS TAKEN TO ADDRESS CONCERNS</b></p>	<p>Supplier Risk Management program</p> <p>Public reporting on efforts in Modern Slavery Statement</p>
<p><b>LEAD FUNCTIONS</b></p>	<p>Supply Chain / Legal</p>
<p><b>POTENTIALLY IMPACTED RIGHTS HOLDERS</b></p>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Employees</li> <li><input checked="" type="checkbox"/> Suppliers/Coworkers</li> <li><input checked="" type="checkbox"/> Local Communities</li> <li><input checked="" type="checkbox"/> Vulnerable/Marginalized Groups</li> </ul>

# Salient Human Rights Risks

## RIGHT TO SELF-DETERMINATION

NEWMONT'S SALIENT HUMAN RIGHTS RISKS AND DESCRIPTION OF RELEVANCE TO NEWMONT	<b>Right to self-determination</b> Includes the right of peoples to develop and progress in social, economic and cultural terms, to dispose of their land's natural resources and wealth, and not to be deprived of their own means of subsistence.	
RELEVANT POLICIES/STANDARDS	<ul style="list-style-type: none"> <li>• Sustainability and Stakeholder Engagement Policy</li> <li>• Indigenous Peoples Standard</li> </ul>	<ul style="list-style-type: none"> <li>• Land acquisition and involuntary resettlement standard</li> <li>• Cultural Resource Management Standard</li> </ul>
EXAMPLES OF MITIGATION MEASURES AND STAKEHOLDER ENGAGEMENT	<ul style="list-style-type: none"> <li>• Cultural resource management</li> <li>• Impact assessments</li> <li>• Complaint &amp; grievance mechanisms</li> <li>• Engagement with Indigenous groups</li> </ul>	<ul style="list-style-type: none"> <li>• Expert advisory panels (i.e. to inform FPIC practices)</li> <li>• Engagement with community members to establish cooperation agreements (i.e. in Suriname)</li> </ul>
EXAMPLES OF STAKEHOLDER CONCERNS RELATED TO SALIENT RISKS	Lack of coordinated & collaborative engagement with Indigenous groups on land management programs	
EXAMPLES OF ACTIONS TAKEN TO ADDRESS CONCERNS	Collaboration with land councils and academia on scoping studies and projects (e.g. on rehabilitation and closure and analysis of market opportunities for IP programs)	
LEAD FUNCTIONS	Sustainability & External Relations	
POTENTIALLY IMPACTED RIGHTS HOLDERS	<input type="checkbox"/> Employees <input type="checkbox"/> Suppliers/Coworkers	<input checked="" type="checkbox"/> Local Communities <input checked="" type="checkbox"/> Vulnerable/Marginalized Groups





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