

Stakeholder Relationship Management Standard

Purpose & Objectives

This Global Standard sets the minimum requirements to adequately identify and effectively engage people and groups who have the potential to impact, or to be impacted by our business activities. Fulfilling these requirements should provide the means for Newmont to develop and maintain constructive, long-term stakeholder relationships based on trust and respect in order to maximize the shared value of Newmont's operations.

Scope

The scope of this Standard is global. It applies to all directors, officers and employees of Newmont Corporation ("NC") or any entity that is controlled or managed by NC (together with NC, "Newmont" or the "Company"). In addition, where explicitly stated in an applicable contract, it may apply to Newmont's contingent workers, vendors, contractors, and other types of business partners. It is applicable to all sites and in all phases of the mine life cycle including exploration, design, construction, operation and closure.

Content

1. Planning & Design

1.1 Stakeholder Identification & Analysis

- 1.1.1. Sites shall use a Stakeholder mapping process to identify, analyze, and document individual and groups of stakeholders and their interrelationships upon entering a project area.
- 1.1.2. Where information cannot be gathered through direct interaction with the stakeholders, Sites shall gather the data, as available and appropriate, from relevant and credible sources.
- 1.1.3. Sites shall develop a systematic process to analyze stakeholder risks, conflicts, concerns, complaints and expectations identified during mapping exercises. Data from this analysis should be used to update the Site and/or regional enterprise risk management system and/or issues register as appropriate on an annual basis or more frequently as appropriate.

1.2. Engagement Planning

- 1.2.1. Sites shall document a stakeholder engagement plan that incorporates information from stakeholder mapping and analysis. The plan shall include:
 - a) A summation of key stakeholder issues, concerns, and interests
 - b) A prioritized list of stakeholders to be engaged based on their level of influence and impact
 - c) Culturally appropriate engagement mechanisms to be used to address stakeholder issues, concerns, and interests linked to a schedule and/or timeline, and frequency
 - d) Engagement objectives and measures of success.
- 1.2.2. Sites shall ensure that engagements with Indigenous Peoples involve culturally appropriate representative bodies and organizations while allowing sufficient time for traditional decision making processes.

- 1.2.3. Engagement with Indigenous People shall adhere to the Free Prior Informed Consent (FPIC) requirements outlined within the ICMM Statement on Indigenous Peoples (May 2013).
- 1.2.4. Sites shall develop a set of agreed-upon, cross-functional core messages about Site activity to ensure consistency throughout engagement activities to manage expectations.
- 1.2.5. Sites shall provide necessary cultural awareness, conflict, negotiation, human rights, and/or communication training to relevant personnel that play an active role in stakeholder engagement to ensure that behaviors honor local norms, rules, and systems, and promote active dialogue and listening.
- 1.2.6. Necessary and relevant Site information shall be identified and made available to stakeholders in a culturally appropriate manner to create an informed engagement process.
- 1.2.7. Where marginalized and/or vulnerable groups have been identified, procedures shall be developed and implemented to ensure these groups are engaged to address associated issues and concerns.
- 1.2.8. Sites shall develop an authority hierarchy and process to review and approve commitments made on behalf of the company. The process shall be communicated to stakeholders and identify how commitments will be established, formalized and managed.
- 1.2.9. Sites shall develop multi-tiered mechanisms in consultation with stakeholders for the identification, tracking, escalation and resolution of local community complaints and/or grievances consistent with the UN Guiding Principles on Business and Human Rights as follows:
 - a) **Tier 1** - For handling complaints that may be resolved between the Site and the complainant
 - b) **Tier 2** – For handling complaints that cannot be resolved directly by the Site and complainant and may require referral to or involvement of third parties
 - c) **Tier 3** - For handling complaints that are not resolved and must be referred to official agencies or judicial processes

2. Implementation & Management

2.1 Stakeholder Engagement Plan Implementation

- 2.1.1 Sites shall validate stakeholder mapping data via direct interaction with relevant stakeholders where possible.
- 2.1.2 Sites shall ensure that representatives from other functions actively participate and lead engagement activities where appropriate to ensure accuracy of communications and improved ability to respond to questions.
- 2.1.3 Engagement activity shall be undertaken in an informed and culturally appropriate manner, based on the knowledge gained through conducting stakeholder mapping and social baseline studies.
- 2.1.4 Local community leaders shall be encouraged to play a leadership role in engagement processes, where appropriate.
- 2.1.5 Sites shall ensure that safety and emergency response awareness are incorporated into engagements with communities and other key stakeholders.

- 2.1.6 Sites shall evaluate the capacity of relevant external stakeholders to engage effectively. Where deemed necessary and appropriate, resources (financial or in the form of expertise, training, or technical/logistical support) shall be made available to external stakeholders to allow them to engage effectively.
- 2.1.7 Sites shall develop metrics and/or other measures of effective engagement activity and success and document these measures in an electronic and accessible format.
- 2.1.8 Data shall be reviewed by senior management and updated no less than annually or when there is a significant change in operational activity and/or when external events occur that impact stakeholders.
- 2.1.9 Stakeholder engagement plans shall be reviewed by senior management at least annually or more frequently as needed based upon risk and Site socio-economic complexity. Reviews will evaluate progress against the measures of success and identify any gaps or underperformance and address deficiencies.
- 2.1.10 Formal engagements shall be documented via a process whereby the minutes are shared and approved by the attendees.
- 2.2 Expectations, Commitments & Complaints Management
 - 2.2.1 Sites shall maintain a commitment register throughout the life of the Site that enables tracking, management, and closure of commitments.
 - 2.2.2 Where decisions and/or commitments are made and approved by Newmont during the course of stakeholder engagement, the commitment shall be entered into the Site's commitment register and an implementation plan developed to ensure that Newmont responsibilities are fulfilled.
 - 2.2.3 Sites shall ensure that commitments made by Newmont personnel comply with the Partnering Against Corruption Initiative (PACI), the Foreign Corrupt Practices Act, UK Bribery Act and other relevant anti-corruption requirements. The scope of the commitments agreed with community representatives shall be communicated to the broader community via a collaborative process with identified leaders.
 - 2.2.4 Sites shall develop and implement a process for identifying expectations and provide a response (positive or negative) to the source of expectations in a timely fashion. Where it is determined that the expectation is likely to recur, efforts will be made to ensure that the communication plan is applied over the appropriate time frame in a consistent fashion.
 - 2.2.5 Sites shall maintain a complaint and grievance register throughout the life of the Site that enables tracking, management, escalation (if required) and closure of complaints and grievances. Formal records of submitted complaints or grievances shall be provided to complainants in accordance with Site procedures.
 - 2.2.6 Sites shall ensure that stakeholders are informed and trained on how to utilize the complaint and grievance mechanisms.
 - 2.2.7 Sites shall ensure appropriate and routine communication to stakeholders to inform them of the status of closed and pending commitments and complaints.

3. Performance Monitoring

- 3.1 Sites shall develop metrics and/or other measures of effective engagement activity and evaluate effectiveness relative to the changing socio-economic environment no less than annually. The metrics and evaluations shall be documented in an electronic and accessible format.
- 3.2 Sites shall conduct a knowledge, attitude and perception survey with stakeholder groups identified in the engagement process to determine the level of satisfaction with engagement activities and validate the level of success achieved. Perception surveys will be conducted at least every three years, or more frequently as needed based upon risk and socio-economic complexities.
- 3.3 Sites shall review statistics and trends no less than every two years to gauge effectiveness of engagement, commitment, complaint and grievance management activities in collaboration with external stakeholders.
- 3.4 Sites shall ensure that the commitment register is reviewed by Site and/or regional senior management on a routine basis but no less than annually. Where actions to fulfill commitments are lagging, corrective actions will be undertaken to ensure activities are executed within a set timeframe. Relevant stakeholders will be informed of the status of these activities.
- 3.5 Sites shall monitor and report the status of commitments, complaints and grievances on a monthly basis to Site and regional management.
- 3.6 Sites should develop a formal and defined schedule for Site senior management to engage stakeholders on a range of subjects, including, but not limited to, the complaints and grievance process, progress against commitments and major project updates.

Terms

Refer to the S&ER Policies & Standards glossary for definitions.

- Collaboration
- Complaint / Grievance
- Conflict
- Commitment
- Expectation
- Free, Prior and Informed Consent (FPIC)
- Indigenous
- Human Rights
- Local community
- Relationship
- Site
- Stakeholder
- Stakeholder Mapping
- Vulnerable / Marginalized groups

References

- NEM-SER-STA-017 Social Baseline and Impact Assessment.
- Stakeholder Engagement: A Good Practice Handbook for Companies Doing Business in Emerging Markets. IFC, 2007.
- Community Development Toolkit. ESMAP, World Bank & ICMM, 2005.
- The Stakeholder Engagement Manual, Vol. 2: The Practitioner's Handbook. AccountAbility & UNEP, 2005.
- Conflict-Sensitive Business Practice: Guidance for Extractive Industries, International Alert, March 2005.
- Indigenous Peoples Guidebook on Free Prior Informed Consent, First Peoples, May 2012.
- Indigenous Peoples and Mining, ICMM Position Statement, May 2013.

Document Control

VERSION	AUTHOR	APPROVER	APPROVAL DATE
1.0	Rick Morrow	Policies & Standards Committee	03/21/2014
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