



Newmont Australia Modern Slavery Statement

9 July 2021

BACKGROUND

In 2018, Newmont published its first global statement on our actions to address modern slavery risks across our operations and supply chains. We remain committed to open and transparent reporting on the challenges we face in this area. This statement reflects our commitment to respecting Human Rights and highlights key actions we are taking to address risks in our own operations and our supply chain, including risks associated with modern slavery.

AUSTRALIAN MODERN SLAVERY ACT (2018)

While Newmont has elected at a global level to voluntarily publish its statement on actions to address modern slavery since 2018, this is the first statement prepared by Newmont under the *Australian Modern Slavery Act (2018)* (the "Act"). The following entities are the reporting entities covered by this joint statement:

- Newmont Australia Pty Ltd (ABN 95 099 040 507);
- Newmont Mining Services Pty Ltd (ABN 22 008 087 778);
- Newmont Boddington Pty Ltd (ABN 32 062 936 547);
- Saddleback Investments Pty Ltd (ABN 96 134 978 224); and
- Newmont Tanami Pty Ltd (ABN 39 007 688 093).

The table below describes the sections of this joint statement that are relevant to the mandatory reporting criteria required by the Act.

Mandatory reporting criteria from the Act	Section(s) of this statement that satisfy the mandatory reporting criteria	Additional information
<i>Identify the reporting entities covered by the joint statement</i>	Australian Modern Slavery Act (2018) (page 1)	<ul style="list-style-type: none">• List of the 'Reporting entities' covered by this joint statement
<i>Describe the structure, operations and supply chains of the reporting entities</i>	Structure, Business and Supply Chain (pages 2 – 4)	<ul style="list-style-type: none">• Newmont overview• Countries in which we operate• Newmont in Australia• Our supply chain
<i>Describe the risks of modern slavery practices in the operations and supply chains of the reporting entities (and any</i>	Our Supply Chain (pages 3 and 4)	<ul style="list-style-type: none">• Identification of categories of 'high risk' goods and services



<i>entities that the reporting entities own or control)</i>		
<i>Describe the actions taken by the reporting entities (and any entity that the reporting entities own or control) to assess and address those risks, including due diligence and remediation processes</i>	<p>Policies and Governance (pages 4 and 5)</p> <p>Our Approach (page 5)</p> <p>Risk Assessments and Management (page 6)</p> <p>Training (page 7)</p>	<ul style="list-style-type: none"> • Description of our Code of Conduct and other internal policies and standards • Undertaking of internal and external audits • Overview of our Supplier Risk Management program • Availability of our Integrity Help Line • Human rights training
<i>Describe how the reporting entities assesses the effectiveness of actions being taken to reduce the risk of modern slavery practices occurring</i>	<p>Tracking Effectiveness (page 7)</p> <p>Lessons Learned (page 7)</p>	<ul style="list-style-type: none"> • Ongoing engagement and collaboration with suppliers • Undertaking of audits • Tracking performance through complaints and grievance mechanisms • Reflecting on lessons learned
<i>Describe the process of consultation with the reporting entities covered by the joint statement (and any other entities that the reporting entities own or control)</i>	<p>Collaboration and Learning From Others (page 8)</p>	<ul style="list-style-type: none"> • Consultation and collaboration with our peers to further enhance systems and controls
<i>Any other relevant information</i>	<p>Future Activities (page 8)</p>	<ul style="list-style-type: none"> • Overview of future activities (including roll out of further training/audit program and review of our pre-qualification/complaints and grievance processes)

STRUCTURE, BUSINESS AND SUPPLY CHAIN

Newmont is the world's leading gold company and a producer of copper, silver, zinc and lead. As of December 31, 2020, we had approximately 14,300 employees and 13,500 contractors with significant operations in North America, South America, Australia and Africa. The countries where we operate vary significantly in terms of potential risks associated with modern slavery but we recognise that modern slavery risks may exist in any jurisdiction. For that reason, our approach to supplier risk management is global.



Newmont in Australia

Newmont owns 100% of the Boddington gold mine in Western Australia and the Tanami gold mine in the Northern Territory. Newmont is also responsible for the management of two legacy mine sites: Woodcutters in the Northern Territory and Mt. Leyshon in Queensland. Newmont's Australian Regional office is located in Subiaco, Perth, Western Australia.

In 2020, Newmont Boddington produced 670,000 ounces of gold and 128,000 gold equivalent ounces of other metals, while Newmont Tanami produced 495,000 ounces of gold. **Table 1** below provides more information on the economic contribution of Newmont Australia. Newmont reports annually on our environment, social and governance performance in our Annual Sustainability Report, and this report is also produced more specifically for Newmont Australia on an annual basis. Newmont's 2020 Annual Sustainability Report can be found [here](#) and the Newmont Australia Regional Sustainability Report will be produced later this year –reports from previous years can be found [here](#).

Table 1

2020 Economic value distributed (in millions, AUD*)					
Employees	Employee Wages and Benefits	Payments to Government	Total spent on Suppliers	Total spent with Local suppliers (%)**	Total spent with National suppliers (%)
2173**	\$338	\$318	\$1556	\$594 (38%)	\$884 (56%)

Notes:

* All figures are as presented in the Newmont 2020 Annual Sustainability Report, with USD figures converted to AUD on a 1 to 1.25 basis for illustrative purposes only

** Does not include contractors – permanent only

*** At Boddington, local suppliers are located in the State of Western Australia, while at Tanami, local suppliers are located in the Northern Territory. National suppliers are located in Australia but outside of these two States.

Our Supply Chain

The mining industry has complex, global supply chains. Newmont's supply chain activities cover the full life cycle of the mine from exploration through to post-closure and include: the procurement of goods (for example equipment and bulk commodities); operational and technical services (for example transportation and logistics); and administrative and support activities. As can be seen from the above information in Table 1, Newmont Australia sources 94% of its goods and services from within Australia.

Each year, Newmont procures goods and services from thousands of suppliers worldwide, including many local suppliers based near our projects and operations. We believe the following categories of goods and services to be potentially 'high risk':

- some process maintenance services (including painting and sandblasting);
- specific bulk commodities (including lime, sand and gravel and cement);
- transport and logistics (including ocean freight and warehouse operations services);
- technical engineering and construction services (including reclamation activities); and



- administrative and support activities (including cleaning, repairs, accommodation and security).

Globally, these categories of goods and services have been associated with labour rights risks including slavery, human trafficking, compulsory, forced or child labor, discrimination, harassment, bullying and workplace violence.

POLICIES AND GOVERNANCE

Newmont does not tolerate any form of slavery, human trafficking, or compulsory, forced or child labour. Our [Code of Conduct](#) (“Code”) defines the expectations of behavior for Newmont employees and business partners, including suppliers working with us or on our behalf. The Code explicitly refers to the fundamental human rights of the people where we operate and those with whom we work. Suppliers are provided with and must comply with Newmont’s Code of Conduct as part the terms and conditions for doing business with Newmont.

Our [Sustainability and Stakeholder Engagement Policy](#) outlines our commitment to the UN Guiding Principles on Business and Human Rights (“Guiding Principles”). This commitment is further elaborated in our [Human Rights Standard](#), which reflects the minimum requirements to which all sites must adhere. In line with this standard, human rights clauses are included in our contracts with suppliers. These clauses recognise Newmont’s commitment consistent with the Universal Declaration of Human Rights, which includes labour rights. Our contracts also include requirements for suppliers to report any human rights issues in their supply chain of which they become aware.

Our [People Policy](#) prohibits engaging in or condoning, any form of child, forced or compulsory labor at any of our sites. We also have a [Supplier Code of Conduct](#), which has a clause on human rights and labour issues outlining our zero tolerance for discrimination, harassment, workplace violence, bullying or child and forced labour within our supplier’s own or their affiliates’ operations or the operations of other companies within their own or their affiliates’ supply chains. It also includes requirements about the timely payments of salaries and benefits to employees, subcontractors and sub-suppliers and the need to address complaints or grievances expeditiously.

Our [Stakeholder Relationship Management Standard](#) includes requirements for all sites to have complaint and grievance mechanisms in line with the Guiding Principles. We have a global cross-functional human rights working group consisting of representatives from legal, business integrity & compliance, supply chain, human resources, health, safety and security, risk and communications. The working group provides oversight and expertise on a range of human rights issues, including modern slavery. We take a cross-functional approach to managing human rights risks in Australia and annually undertake a cross-functional review of modern slavery risks in our local supply chains.

Through contract terms, MOUs, standard operating procedures, supplier trainings and audits, we make our suppliers and business partners aware of our human rights commitments including commitments to the Voluntary Principles on Security and Human Rights, the requirements in our Indigenous Peoples, Cultural Resource Management and Water Management Standards. We reinforce these commitments with Governments, joint venture partners (even where we are not the operator) and minority interests and use our leverage when possible. Internally, we monitor



compliance with our environmental and social standards through audits and externally we have developed a human rights audit process for suppliers.

OUR APPROACH

Supplier Risk Management Program

The approach we take to human rights due diligence across our operations is based on the Guiding Principles. Our Supplier Risk Management program (“SRM Program”) aligns to the Guiding Principles and roll out began in 2018. This program has a number of controls in place that will help mitigate risks across the supplier ‘life cycle’ as shown below.



- *Prequalification* – this is the key element in the assignment of a human rights risk rating to suppliers. Where risks are identified, further action is undertaken.
- *Planning and Scoping* – this work entails the development of requirements associated with the delivery of services or goods aligned to Newmont’s standards and policies. It also includes a scope of work risk assessment to identify whether the nature of the work to be undertaken presents any risks from a human rights perspective.
- *Contract Sourcing and Executing* – human rights expectations are included in suppliers’ contractual terms and conditions with which they much comply.
- *Mobilisation* – mobilisation workshops are undertaken to ensure all parties (including suppliers) are familiar with their obligations under the contracts and are familiar with execution requirements. Online human rights training is included as part of this process.



- *Supplier Management* – a supplier management plan is put in place which supports the ongoing review of supplier performance and appropriate functional controls for identified risks.
- *Close Out*

RISK ASSESSMENTS AND MANAGEMENT

Identification of country risks

One of the many risk management tools we use is our Country Risk program, which identifies countries that are important to our business and ranks them based on their economic, political, social, environmental, infrastructure and security risks. Included in this tool are risks related to human rights. The Modern Slavery related human rights included in our assessments include: rights around labour issues, personal integrity and security of person, freedom of expression, freedom of association and minority rights.

Integrating human rights into risk assessments

In addition to the contract terms for suppliers, our Human Rights standard requires sites to integrate human rights into their existing processes. They must identify human rights issues on an ongoing basis through: engagement with external stakeholders, ongoing risk and impact assessments, events; and complaints and grievance mechanisms. A list of which sites have undertaken human rights assessments (either integrated or standalone) is available in a data table (pg.176) of [Newmont's annual sustainability report](#).

Remedy

Any concerns, including those around modern slavery, can be raised through our site-level complaints and grievance mechanisms or our Integrity Help Line (online or by phone), which is a confidential channel for workers and external stakeholders.

We require that our suppliers remedy complaints or grievances expeditiously and our Supplier Code of Conduct is provided to suppliers as part of our onboarding process. Where suppliers do not have their own complaints mechanism, they may direct complainants to Newmont's mechanisms or Newmont's Integrity Help Line. We prohibit any form of retaliation against anyone raising a human rights issue or concern and expect those we work with to do the same. We reinforce our anti-retaliation provision of the Code of Conduct when employees present questions or complaints of violations of our Code of Conduct. Similarly, we prohibit retaliation against any other stakeholder for raising human rights related complaints and concerns. Our Integrity Help Line supports this by enabling the reporting of anonymous complaints or concerns through a third party.

TRAINING

Our Human Rights standard requires that all sites conduct human rights training. Several versions of an online training program have been rolled out to employees. As of June 2020, the latest version of the training (launched in December 2020), had been undertaken by 649 employees from the Australian region. The training includes details around the International Labour Organisation (ILO) Conventions, scenarios around child labour and the use of forced labour by a supplier and other information on modern slavery risks. Some regions undergo standalone in-person human rights



training and others have incorporated it into their existing training programs, for example on the Voluntary Principles on Security and Human Rights. In 2020, the Australian region initiated an online training for suppliers. The training highlights red flags around freedom of association and collective bargaining, including: direct interference with workers attempting to exercise their legal rights, intimidation and discrimination and improper influence. It also includes effective practice, promoting supplier policies to respect workers' rights to freedom of association and collective bargaining and commitments to monitor whether workers are aware of their rights and have no fear of penalty or consequences for engaging in union or other worker organisation activities.

TRACKING EFFECTIVENESS

Since the roll out of our Supplier Risk Management program, the pre-qualification process for suppliers has been effective in identifying potential risks in our supply chain. This has resulted in follow up with a number of suppliers, deemed higher risk from a human rights perspective, to encourage engagement with the online training program or to flag suppliers for human rights audits. Newmont engaged Verité — an independent nonprofit civil society organization focused on highlighting labor rights violations in the supply chain — to undertake audits of select suppliers in Australia, Ghana and Peru.

In the Australia region, a cross-functional team assessed companies' human rights risks, including modern slavery risks, on the basis of responses to pre-qualification surveys. Australian suppliers were then given a risk rating, which determined if further follow up action was required. In the Australian region in 2020, only one supplier was identified for follow up action. As a result of this high risk supplier being audited, no serious findings related to Modern Slavery were identified, although the review did make a number of findings including:

- the suppliers' human resources framework required updates;
- increased training needed on the suppliers' human rights obligations to their employees;
- more robust processes needed around: auditing compliance with labour requirements, grievance procedures and time management systems; and
- a number of human resource related findings were also identified.

Direct engagement with the supplier is taking place to address these findings.

We also track performance through our complaints and grievance mechanisms that capture issues related to suppliers. We have a public target to resolve 100 percent of tier 1 complaints within 30 days.

LESSONS LEARNED

Several lessons relevant to human rights related risks have emerged from the roll out of our Supplier Risk Management program. First, we have realised that human rights risks, including modern slavery, can exist in any jurisdiction that we operate in, regardless of how strong the rule of law or legislative frameworks are in that country. Second, we have learned that we cannot rely solely on an automated system (such as our pre-qualification system) to provide an accurate assessment of risk. While the automated system gives some indication of the risk of certain suppliers – it may



flag too many low risk suppliers or not enough high-risk suppliers. We have learned it is necessary to review the automated data with our regional teams who have an awareness of the supplier, their current controls and the type of goods or services they provide. While this takes more time, it provides a more accurate assessment and identification of risk. We also have more work to do in encouraging uptake of our online supplier training and in identifying additional opportunities for promoting positive human rights practices, such as through supplier onboarding.

COLLABORATION AND LEARNING FROM OTHERS

Recognising the value of collaborating with our peers to learn from others and internalise best practices, we are members of several industry groups and multi-stakeholder initiatives. As members of the International Council on Mining and Metals (ICMM), we participate in discussions on human rights. Through the Business for Social Responsibility's human rights working group, we have learned valuable lessons from a variety of other sectors on modern slavery. In Australia, Newmont works closely with the Minerals Council of Australia on human rights issues, including taking up guidance and engagement opportunities in respect of managing risks of or related to Modern Slavery, and meeting the requirements of the Act.

FUTURE ACTIVITIES

Future activities include:

- updating our pre-qualification questions to ensure it accurately flags suppliers that present the highest risks from a human rights perspective, including modern slavery risks;
- implementation of Risk Management Plans for suppliers that are identified as high risk as part of our 2021 human rights risk management process in the Australian region;
- ongoing roll out of our training program;
- continued remediation of substantiated complaints through our site-level complaints and grievance mechanisms and global Integrity Help Line;
- ongoing identification of opportunities to engage suppliers on human rights issues; and
- continue to participate in industry initiatives to support understanding of modern slavery risks and how to action, including through the Minerals Council of Australia.

This statement was approved by the Board of Newmont Australia Pty Ltd on 29 June 2021.

Andrew Kennedy
Director
Newmont Australia Pty Ltd