

Modern Slavery Statement

JUNE 2023

Background

Modern slavery is the term used to describe human trafficking, slavery and slavery-like practices such as servitude, forced labor, debt bondage and the worst forms of child labor. The International Labor Organization (ILO) estimates that there are approximately [50 million victims of modern slavery a year](#), including 28 million people working in forced labor situations.

In 2018, Newmont published its first global Modern Slavery Statement on our actions to address modern slavery, and this statement is the third prepared by Newmont under the Australian Modern Slavery Act (2018). This statement reflects our commitment to respecting human rights and includes the policies, programs and actions we implemented to address modern slavery risks in our own operations and our supply chain during the 2022 fiscal year ending December 31. We remain committed to open and transparent reporting on both our progress and the challenges we face in this area.

For more information on Newmont and our commitment to create value and improve lives through sustainable and responsible mining, including our environmental, social and governance performance, please see our [Annual Sustainability Report](#).



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, 2022, we had approximately 14,700 employees and 17,800 contractors working across our 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 (as shown in Table 1 below). Despite a country's risk ranking, we recognize that modern slavery risks exist in all jurisdictions. For that reason, our approach to forced labor risk management is global.

A summary of our assets and modern slavery risks identified by the [Global Slavery Index](#) is set forth below.

Table 1

Asset (100% owned)	Country	Vulnerability Risk Score*
Ahafo	Ghana	45
Akyem	Ghana	
Peñasquito	Mexico	58
Cerro Negro	Argentina	36
Cripple Creek & Victor (CC&V)	U.S.	25
Boddington	Australia	7
Tanami	Australia	
Éléonore	Canada	11
Musselwhite	Canada	
Porcupine	Canada	
Yanacocha	Peru	47
Asset (50% or more)		
Merian (75%)	Suriname	Not included
Asset (under 50%)		
Pueblo Viejo (40%)	Dominican Republic	41
Nevada Gold Mines (38.5%)	U.S.	25

* Level of vulnerability to modern slavery, by country (the higher the score the greater the risk)



Our supply chain

The mining industry has complex global supply chains. Our supply chain activities cover the full lifecycle of the mine from exploration through to post-closure and include: the procurement of goods (e.g., equipment and bulk commodities); operational and technical services (e.g., transportation and logistics); and administrative and support activities (e.g., catering and janitorial services). Each year, Newmont procures goods and services from thousands of suppliers worldwide, including many local suppliers based near our projects and operations. As reported in Table 2 on the next page, Newmont Australia sources 93% of its goods and services from within Australia (local and national suppliers).

We believe the following categories of goods and services to be potentially 'high risk' for modern slavery:

- **Some process maintenance services** (e.g., painting and sandblasting);
- **Specific bulk commodities** (e.g., lime, sand and gravel and cement);
- **Transport and logistics** (e.g., ocean freight and warehouse operations services);
- **Technical engineering and construction services** (e.g., reclamation activities); and
- **Administrative and support activities** (e.g., janitorial, repairs, accommodation and security).

NEWMONT IN AUSTRALIA

Newmont owns 100% of the Boddington gold mine in Western Australia and the Tanami gold mine in the Northern Territory. The Tanami gold mine is located on Aboriginal Freehold Land held in trust by the Warlpiri Traditional Owners. For the Boddington mine, Newmont has entered into a voluntary agreement with the Gnaala Karla Booja Traditional Owners in recognition of the interests that this group has in the land on which the Boddington mine is located. These agreements acknowledge and protect the legal rights and interests of the relevant Traditional Owners.

Newmont is also responsible for the management of two legacy mine sites in Australia: Woodcutters in the Northern Territory and Mt. Leyshon in Queensland. Newmont Australia's regional office is located in Subiaco, Perth, Western Australia.

In the Australia region, Newmont employs approximately 2,200 direct employees and 2,200 contractors. In 2022, the Newmont Boddington mine produced 798,000 ounces of gold and 227,000 gold equivalent ounces of other metals, while the Newmont Tanami mine produced 484,000 ounces of gold. Table 2 below provides more information on the economic contribution of Newmont Australia.

Table 2

2022 Economic value distributed (in millions, AUD*)

Employee wages and benefits	Payments to government	Total spent with suppliers	Total spent with local suppliers (%)*	Total spent with national suppliers (%)
\$391	\$633	\$2,075	\$647 (31%)	\$1,290 (62%)

* All figures are as presented in Newmont's 2022 Annual Sustainability Report, with USD figures converted to AUD on a 1 to 1.44 basis for illustrative purposes only.



Photo: Boddington, Australia

POLICIES AND GOVERNANCE

We do not tolerate any form of slavery, human trafficking, or compulsory, forced or child labor. 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.

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 Newmont sites must adhere. In line with this standard, Newmont global-level contract templates include a clause regarding compliance with the Universal Declaration of Human Rights (UDHR). The clause also requires suppliers to continue to represent that they are compliant with the UDHR as of the date that any invoice is submitted to us.

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 labor issues outlining our requirement that suppliers are not complicit in human rights abuses, including discrimination, harassment, child labor or forced and compulsory labor. The clause applies to suppliers’ own operations, as well as any subcontractors working on their behalf or the operations of other companies within their own or their subcontractors’ supply chains. It also includes requirements about the timely payments of salaries and benefits to employees, subcontractors and suppliers and the need to address complaints or grievances expeditiously.

Our [Stakeholder Relationship Management Standard](#) includes requirements for all Newmont sites to have complaint and grievance mechanisms in line with the Guiding Principles.

Governance

To embed the respect for human rights throughout the Company, at the corporate level, we have a global cross-functional human rights working group consisting of representatives from sustainability and external relations, legal, business integrity and compliance, supply chain, human resources, health, safety and security, risk, exploration and resource modeling. The working group provides oversight and expertise on a range of human rights issues, including modern slavery. Our operations are also required to have cross-functional human rights working groups at the regional or site level.

Through contract terms, memorandums of understanding, standard operating procedures and supplier training, we make our suppliers and business partners aware of our human rights commitments, including commitments to the Voluntary Principles on Security and Human Rights, as well as the requirements in our Cultural Heritage, Indigenous Peoples and Water Management Standards. We reinforce these commitments with governments, joint venture partners (even where we are not the operator) and minority interests.

Responsibility for the management of our overall human rights approach resides with the Senior Vice President for External Relations. This role reports to the Chief Strategy and Sustainability Officer, who reports to the President and CEO. Management reviews human rights matters with the Board of Directors’ Safety and Sustainability Committee every quarter and conducts a more thorough review of the Human Rights Strategy and performance against targets at least once a year. The Committee’s Chair apprises the full Board of any significant matters or developments.

OUR APPROACH

Modern slavery risks incorporated into the Supplier Risk Management program

The approach we take to human rights due diligence across our operations is based on the Guiding Principles. As modern slavery risks are more likely to be found in our supply chain than in our direct workforce, our Supplier Risk Management (SRiM) program is a critical component of our approach to addressing modern slavery risks. SRiM aligns to the Guiding Principles, and rollout began in 2018. This program has a number of controls in place that help mitigate risks across the supplier 'lifecycle' as shown below.

Supplier Human Rights Due Diligence Aligned to UN Guiding Principles

Communication

- External reporting on labor issues in Annual Sustainability Report

Performance Management and Measuring Effectiveness

- Targeted supplier audits cover labor rights issues
- Supplier management plans



Supplier Pre-qualification

- Criteria on labor issues and modern slavery risks

Risk Assessments on Scope of Work

- Modern slavery issues considered when assessing risks from scope of work

Prevention and Mitigation

- Supplier training and mitigation based on risk assessment

Remedy

- Site-level grievance mechanisms can capture modern slavery related issues
- Integrity Helpline can accept modern slavery related topics

Identification of country risks

One of the many risk management systems we have put in place is our Geopolitical Risk Program, which aligns with our overall risk management approach and incorporates key risk indicators, including human rights, to inform significant investment decisions and risk management strategies. The program's geopolitical risk model quantifies and qualifies top risks for investment decisions. This framework assesses the top risks identified through cross-functional due diligence which considers the following human rights issues related to modern slavery: labor 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 Newmont 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 reporting, and complaints and grievance mechanisms. Each operating site must update its social impact assessment (SIA) at least every five years per our Social Baseline and Impact Assessment Standard, and the SIA must include human rights considerations. Some sites have also chosen to undertake standalone human rights impact assessments (HRIAs), which include supply chain issues in their scope. To date, we have conducted standalone HRIAs in Ghana, Peru, Suriname and, when it was operating, a former Goldcorp mine in Guatemala.

Supplier Risk Assessment

For operating sites that implement SRiM, new suppliers and suppliers up for contract renewal are invited to complete a pre-qualification questionnaire. This survey tool includes questions related to human rights risks, including forced and child labor. The questionnaire was revised in 2022 to more accurately identify risks. This questionnaire serves as a first line of risk identification for suppliers that may have an elevated likelihood of impacting human rights. The supplier scope of work is also assessed internally for risk elements, such as contractors who employ unskilled labor, where modern slavery risks are likely to be higher.

In high-risk cases, targeted supplier audits are also a tool that can be employed to further identify human rights risks and develop corrective actions. In 2022, we conducted audits of five suppliers identified as high risk from a corruption perspective; no audits were conducted for modern slavery risks.

Remedy

Any concerns, including those around modern slavery, can be raised through our site-level complaints and grievance mechanisms or our Integrity Helpline (online or by phone), which is a third-party administered confidential channel for workers and external stakeholders. We also require that our suppliers remedy complaints or grievances expeditiously (see Supplier Code of Conduct). Where they do not have their own mechanism, they may direct complainants to our local mechanisms or the Integrity Helpline.

We prohibit any form of retaliation against anyone (employees or external stakeholders) raising a human rights issue or concern and expect those we work with to do the same. Our Integrity Helpline supports this by enabling the reporting of anonymous complaints or concerns through a third party. We reinforce our anti-retaliation provision of the Code of Conduct when employees present questions or complaints of violations of our Code of Conduct.

TRAINING

Our Human Rights Standard requires that all Newmont sites conduct human rights training. Training has included details around the ILO Conventions and scenarios around child labor and the use of forced labor by a supplier. In addition to global online training, some regions conduct in-person human rights training for employees and suppliers, and others have incorporated it into their existing training programs, for example on the Voluntary Principles on Security and Human Rights.

Online employee training has been released regularly since the first version in 2018. All versions have included information on modern slavery with examples on how to identify it. As of March 31, 2023, over 5,800 employees globally have taken the 2022/2023 version of the training.

Our supplier training program focuses on suppliers with an elevated potential for human rights risks. The primary objectives of the program are to:

- State expectations for supplier performance on human rights;
- Review labor rights in the context of international frameworks and expectations, emphasizing freedom of association and collective bargaining rights; and
- Provide additional information, resources and tools to help suppliers identify and address possible human rights risks associated with their activities.

In 2022, we conducted in-person human rights training to over 60 suppliers with an elevated likelihood of impacting human rights in Ghana and Peru. Australia's supplier training was deferred to 2023 due to the transition to a new online training platform.

TRACKING EFFECTIVENESS

Since the rollout of our SRiM program, the pre-qualification questionnaire for suppliers has been one tool for identifying potential risks in our supply chain. This risk identification has resulted in follow-up with a number of suppliers, deemed higher risk from a human rights perspective, to encourage engagement through training or to flag them for further investigation. We believe that engagement through training and awareness raising is an important first step in mitigating risk.

In the Australia region, suppliers identified through the pre-qualification screening as potential high risk are reviewed by the cross-functional human rights working group. The supplier responses and scope of work are further reviewed to determine if further follow-up action is required. The Australia region identified 10 suppliers in 2022 that will be engaged in the revised supplier training program to be rolled out in 2023.

We have had human rights and supply chain compliance targets in place since 2018. In 2022, the target included implementing risk mitigation plans for 80 percent of new contracts with suppliers that have been identified as having an elevated likelihood of impacting human rights. In 2022, we met our target in Peru, but not in Australia or Ghana. Further detail on our target performance is reported in our Annual Sustainability Report.

We also track performance through our complaints and grievance mechanisms that capture issues related to suppliers and publish actual or potential impacts in our Annual Sustainability Report. None of the reports received, investigated and addressed in 2022 related to instances of child or forced labor or other forms of modern slavery.

COLLABORATION AND LEARNING FROM OTHERS

Recognizing the value of collaborating with our peers to learn from others and internalize 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 numerous discussions on human rights. Through BSR's Human Rights Working Group we have learned valuable lessons from a variety of other sectors on modern slavery.

LESSONS LEARNED

Our approach to modern slavery has largely been driven by the development and rollout of our SRiM program. The program is currently rolled out in seven of our 12 operating sites with the target to be rolled out to all operating sites by the end of 2024. As the program continues to scale, we also continue to strive toward continuous improvement. We believe that training and awareness-raising, both for suppliers and for our employees, is a critical foundation. As our employees become more aware and informed of modern slavery risks, they are also able to spot and report issues and concerns about labor practices that they observe.

We also recognize the limits of our pre-qualification survey, which is a self-assessment approach and may or may not detect modern slavery risks. In 2022, we revised the questionnaire to improve the risk identification as too many low-risk suppliers were being flagged. In 2022, 22 percent of the suppliers that completed the pre-qualification questionnaire were identified as potential high risk, which was down from 29 percent in 2021.

FUTURE ACTIVITIES

Future activities include:

- Target to implement standalone or integrated HRIAs in Australia, Canada and Peru;
- Scaling supplier human rights training program to new operating sites, including focused training for contract administrators and owners to build literacy and effectiveness of integrated risk management approach;
- Evaluating the supplier audit approach and identifying interventions to improve mitigation effectiveness;
- Continued remediation of substantiated complaints through our site-level complaints and grievance mechanisms and global Integrity Helpline;
- Ongoing identification of opportunities to engage suppliers on human rights issues;
- Continued participation in industry initiatives to support understanding of modern slavery risks and how to action these, especially as they relate to the Australian Modern Slavery Act; and
- Continuing to track, engage and input into government processes that consider changes to or development of human rights legislative frameworks via representative industry forums, including the Minerals Council of Australia (MCA).

CONSULTATION

Our approach to human rights and modern slavery is global, and we engage across the business on a regular basis on these topics through the implementation of our global human rights policies, standards and integrated risk management system. During 2022, we actively engaged and consulted with the reporting entities listed in this report on human rights risk identification, management and implementation reporting through the Newmont Australia region human rights working group. The report was prepared by our subject matter experts, who coordinated with the Australia region and consulted with departments across the business, including sustainability and external relations, supply chain, legal, business integrity and compliance, and communications.

This statement provides a high-level overview of information that is detailed further in other reports. For more details on our human rights program including: the risk mitigations in place for suppliers throughout the supplier lifecycle; using leverage with business partners; complaints and grievance mechanisms; and training information, see [Respecting Human Rights: Our Approach](#). Annual human rights data, including progress against human rights targets, is available in our [Annual Sustainability Report](#).

This Statement is made pursuant to the Australian Modern Slavery Act (2018) and was approved by the Board of Newmont Corporation on June 6, 2023 on behalf of the reporting entities. For the purposes of the Australian Modern Slavery Act, the reporting entities covered by this joint modern slavery statement are identified on page 12 of this statement.



Tom Palmer,
President and Chief Executive Officer

APPENDIX 1

The following entities are the reporting entities covered by this joint statement under the Australian Modern Slavery Act (2018):

- 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)
- Newmont Tanami Pty Ltd
(ABN 39 007 688 093)



APPENDIX 2

Table 3 below describes the sections of this statement that are relevant to the mandatory reporting criteria required by the Australian Modern Slavery Act (“Act”).

Table 3		
Mandatory reporting criteria from the Act	Section(s) of this statement that satisfy the mandatory reporting criteria	Additional information
Identify the reporting entities covered by the joint statement	Australian Modern Slavery Act (2018) (page 12)	<ul style="list-style-type: none"> List of the ‘reporting entities’ covered by this joint statement
Describe the structure, operations and supply chains of the reporting entities	Structure, Business and Supply Chain (pages 3-4)	<ul style="list-style-type: none"> Newmont overview Countries in which we operate List of our assets Our supply chain
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entities (and any entities that the reporting entities own or control)	Structure, Business and Supply Chain (pages 3-4)	<ul style="list-style-type: none"> Identification of categories of ‘high risk’ goods and services
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	Policies and Governance (page 6) Our Approach (page 7) Risk Assessments and Management (page 8) Training (page 9)	<ul style="list-style-type: none"> Description of our Code of Conduct and other internal policies and standards Human rights risk assessments Overview of our Supplier Risk Management program Availability of our Integrity Helpline Human rights training
Describe how the reporting entities assess the effectiveness of actions being taken to reduce the risk of modern slavery practices occurring	Tracking Effectiveness (page 9) Lessons Learned (page 10)	<ul style="list-style-type: none"> Ongoing engagement and collaboration with suppliers Tracking performance through complaints and grievance mechanisms Reflecting on lessons learned
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)	Consultation (page 11)	<ul style="list-style-type: none"> Consultation with reporting entities and supporting departments
Any other relevant information	Collaboration and Learning from Others (page 10) Future Activities (page 10)	<ul style="list-style-type: none"> Collaboration with our peers to further enhance systems and controls Overview of future activities



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