

# Modern Slavery Statement

MAY 2024

# Background

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We recognize our activities, throughout the mine lifecycle, have the potential to affect human rights. Our commitment to managing these risks includes minimizing impacts from our activities, while contributing to social and economic sustainability through our interactions with employees, contractors, suppliers and host communities. Our approach to human rights includes our work to address the risks of modern slavery and child labor. Modern slavery is the term commonly used to describe human trafficking and slavery, and slavery-like practices such as servitude, forced labor and debt bondage. Child labor is defined by the International Labor Organization as work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.<sup>1</sup> The worst forms of child labor are also often considered forms of modern slavery.

Newmont's Modern Slavery Statement is published in accordance with the reporting requirements of the Australian Modern Slavery Act (2018) and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023). This statement reflects our commitment to respecting human rights and includes the policies, programs and actions we implemented to address modern slavery and child labor risks in our own operations and our supply chain during the 2023 fiscal year ended December 31. We remain committed to open and transparent reporting on both our progress and the challenges we face in this area.

On November 6, 2023, Newmont acquired Newcrest Mining Limited. As integration activities commenced at the end of 2023, work is ongoing to implement and align policies and approaches to modern slavery and child labor risks. For more information on Newcrest's approach and work to address modern slavery risks prior to the acquisition, please see [Newcrest's 2023 Modern Slavery Statement](#) covering the period July 1, 2022 to June 30, 2023.

For more information on Newmont and our commitment to respect human rights, create value and improve lives through sustainable and responsible mining, including our environmental, social and governance performance, please see [Our Approach to Human Rights](#) and our [2023 Sustainability Report](#).

<sup>1</sup> <https://libguides.ilo.org/child-labour-en>

## STRUCTURE, BUSINESS AND SUPPLY CHAIN

Newmont is the world's leading gold company and a producer of copper, zinc, lead and silver, with its headquarters in Denver, Colorado. We have more than 40,000 employees, contractors and third-party workers across our operations in Africa, Australia, Latin America and Caribbean, North America and Papua New Guinea. The gold doré and mineral concentrates we produce are transported to refineries and smelters globally for further treatment and refining. End users of our products support multiple industries that include financial, technology, electronics, jewelry and medical. For more information on our global operating assets and their production, please see our [website](#).

The countries where we operate vary significantly in terms of potential risks associated with modern slavery (as shown in the table below). Despite a country's risk ranking, we recognize that modern slavery and child labor risks exist in all jurisdictions. For that reason, our approach to modern slavery and child labor risk management is global. A summary of our operating assets and their level of vulnerability to modern slavery as identified by the 2023 Global Slavery Index<sup>2</sup> is set forth below.

### North America

<b>1. RED CHRIS</b>	11	<b>4. PORCUPINE</b>	11	<b>7. CRIPPLE CREEK &amp; VICTOR (CC&amp;V)</b>	25
CANADA	70% OWNED	CANADA	100% OWNED	USA	100% OWNED
<b>2. BRUCEJACK</b>	11	<b>5. ÉLÉONORE</b>	11	<b>8. PEÑASQUITO</b>	58
CANADA	100% OWNED	CANADA	100% OWNED	MEXICO	100% OWNED
<b>3. MUSSELWHITE</b>	11	<b>6. NEVADA GOLD MINES</b>	25	<b>9. PUEBLO VIEJO</b>	41
CANADA	100% OWNED	USA	38.5% OWNED	DOMINICAN REPUBLIC	40% OWNED

### Oceania

<b>16. LIHIR</b>	79
PAPUA NEW GUINEA	100% OWNED
<b>17. TELFER</b>	7
AUSTRALIA	100% OWNED
<b>18. TANAMI</b>	7
AUSTRALIA	100% OWNED
<b>19. BODDINGTON</b>	7
AUSTRALIA	100% OWNED
<b>20. CADIA</b>	7
AUSTRALIA	100% OWNED



### South America

<b>10. MERIAN</b>	X
SURINAME	75% OWNED
<b>11. FRUTA DEL NORTE</b>	48
ECUADOR	32% OWNED
<b>12. YANACOCHA</b>	47
PERU	100% OWNED
<b>13. CERRO NEGRO</b>	36
ARGENTINA	100% OWNED

### Africa

<b>14. AHAFO</b>	45
GHANA	100% OWNED
<b>15. AKYEM</b>	45
GHANA	100% OWNED

### Legend

- # Asset (100% Owned)
- # Producing Asset (50% or More)
- # Producing Asset (Under 50%)
- # Vulnerability Risk Score (out of 100)  
Level of vulnerability to modern slavery by country (the higher the score the greater the risk)
- X Not Available

<sup>2</sup> <https://www.walkfree.org/global-slavery-index/map>



## 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, fuel, chemicals); operational and technical services (e.g., engineering, construction, transportation); and administrative and support activities (e.g., security, catering, janitorial). Each year, Newmont procures goods and services from thousands of suppliers worldwide, including many local suppliers based near our projects and operations.

We have identified the following categories of goods and services to be potentially “high risk” for modern slavery:

- **specific bulk commodities** (e.g., lime, sand, gravel, cement);
- **transport and logistics** (e.g., ocean freight, warehouse operations);
- **construction services and earthworks** (e.g., reclamation activities);
- **administrative and support activities** (e.g., janitorial, maintenance, accommodation, security);
- **personal protective equipment and apparel** (e.g., uniforms, safety boots, gloves); and
- **contractor roles utilizing labor recruiters.**

Child labor risks are considered low at our mining operations. However, child labor risks are more likely to show up in our supply chain in low-skilled contract labor positions or manufacturing. Child labor risks are also likely to be higher in countries with high poverty rates.

Photo: Ahafo, Ghana

## POLICIES AND GOVERNANCE

We do not tolerate any form of slavery, human trafficking or compulsory, forced or child labor. Our **Code of Conduct** (the 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.

### Policies

Our **Sustainability and Stakeholder Engagement Policy** outlines our commitment to the UN Guiding Principles on Business and Human Rights (the UN 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 that suppliers commit to respect human rights as set forth in the Universal Declaration of Human Rights. The clause requires suppliers to continue to represent that there are no violations of human rights related to their operations 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 UN Guiding Principles. In addition, any complaints or grievances that have potential human rights impacts are marked as such for escalation and review at the enterprise level.

For the newly acquired Newcrest sites, policy gap assessments are being conducted as part of our integration activities.

### Governance

To embed the respect for human rights throughout the Company, at the enterprise level, we have a global cross-functional human rights working group consisting of representatives from safety and sustainability, legal, business integrity and compliance, supply chain, human resources, security, risk, exploration and resource modeling. The working group provides oversight and expertise on a range of human rights issues, including modern slavery and child labor. Our operations are also required to have cross-functional human rights working groups at the business unit 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. We reinforce these commitments with governments and joint venture partners, including where we are not the operator and where we hold minority interests.

Responsibility for the management of our overall human rights approach resides with the Group Head of Social Performance. This role reports to the Chief Safety 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 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 our Supplier Risk Management program

The approach we take to human rights due diligence across our operations is based on the UN Guiding Principles. As modern slavery and child labor 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 these risks. The SRiM program aligns with the UN Guiding Principles and rollout began in 2018. In 2023, SRiM was implemented at seven of our global operating sites, including our sites in Ghana, Peru, Suriname, the U.S. and two of our sites in Australia (Boddington and Tanami). Full implementation of the program is currently planned to be completed by the end of 2026 to align with the strategic rollout of our supply chain system and tools.

The SRiM program has a number of controls in place that help mitigate risks across the supplier lifecycle, as shown below.



### Identification of country risks

One of the 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. These issues are assessed systematically every quarter by an outside consultant who updates the geopolitical risk model and provides a custom report for the Company on key emerging issues for all operating countries. With the Newcrest Mining transaction, we acquired interests in operating assets in two new countries – Papua New Guinea (Lihir mine) and Ecuador (Fruta del Norte equity investment). Through our integration activities, we will further assess the modern slavery and child labor risks, as well as broader human rights risks, in these new jurisdictions.

### Integrating human rights into risk assessments

Our Human Rights Standard requires Newmont sites to integrate human rights into their existing processes and management systems. 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 in their scope.

We periodically review and assess our salient human rights issues at an enterprise level, including assessment of risks related to modern slavery and child labor. Our enterprise salient issues are informed by our site-level assessments, which include local stakeholder input. Identifying our salient human rights issues helps us to prioritize our overall human rights due diligence approach and enterprise human rights strategy. For more information on our salient human rights issues and site-level human rights impact assessments, see our [2023 Sustainability Report](#) and [Our Approach to Human Rights](#) on our website.

## Supplier risk assessment

For operating sites that implement SRiM, new suppliers and suppliers up for contract renewal are required to complete a prequalification questionnaire. This survey tool includes questions related to human rights risks, including forced and child labor. 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 and child labor risks are likely to be higher.

In high-risk cases, targeted supplier due diligence reviews are employed to further identify human rights risks and develop corrective actions. In 2023, we conducted due diligence on suppliers with potential links to Uyghur forced labor in China. One supplier was manufacturing renewable energy components in China; the project did not move forward, ending the due diligence process. The other supplier manufactured security cameras and drone technologies. Newmont had procured products periodically from this supplier in the past and, following the due diligence, we decided to cease sourcing from this supplier, for reasons that included alleged links to supplying surveillance technologies for use in Xinjiang, China. As we only periodically sourced from this supplier, and in small numbers, the decision not to use this supplier was determined to have no adverse impact on the supplier's business or the workers employed.

## 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 employees 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 or other stakeholders present questions or complaints of violations of our Code of Conduct.

In 2023, a case of child labor was reported through our Integrity Helpline from a third party regarding a subcontractor working in Peru on behalf of a Newmont contractor. The subcontractor was reported to have hired a 17-year-old to conduct off-site, non-hazardous waste disposal. The subcontractor did not follow the legal process in Peru for employing a minor, and the work violated Newmont's Supplier Code of Conduct. By working with the contractor, we brought awareness to the issue and the importance of age verification for our contractor as well as any suppliers with which they contract. Through working with our contractor, we encouraged the subcontractor to cover expenses for the minor to return to school, but the individual did not want to resume their education. The subcontractor agreed to offer the minor a formal employment position when they turn 18 years of age.



## TRAINING

Through training, we educate and raise awareness about our employees' responsibility concerning human rights. Global employee online training includes human rights risks of our business, including information on modern slavery and identifying high-risk practices that could be indicators of modern slavery. At the end of 2023, approximately 7,400 employees across the globe completed the 2022/2023 version of the training.

In addition to our online training, we carry out a number of targeted human rights training activities with employees and suppliers, such as training on the Voluntary Principles on Security and Human Rights. 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, including the issues of modern slavery and child labor;

- 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 2023, we conducted in-person human rights training with more than 180 suppliers with an elevated likelihood of impacting human rights in Australia, Ghana, Peru, Suriname and the U.S. We also conducted supplier human rights training with supply chain teams and contract administrators in Australia, Ghana and Suriname.

To increase awareness and promote discussion on Newmont's values outside of training, we use "values moments" at the start of meetings, which may include our commitment to human rights. In 2023, we discussed the incidence of child labor in the U.S. to raise awareness and learn from current events and case studies.

**Photo:** Tanami, Australia



## TRACKING EFFECTIVENESS

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

In 2023, our human rights supply chain target included implementing risk mitigation plans for 100 percent of contracts with certain suppliers<sup>3</sup> identified as having an elevated likelihood of impacting human rights. We fell just short of our goal, training 93 percent of targeted suppliers. However, we more than doubled the number of suppliers engaged in training globally and scaled the program to two new countries – Suriname and the U.S. Further detail on our target performance is reported in our [2023 Sustainability Report](#).

One way we evaluate the effectiveness of training is through the human rights-related issues reported through our complaints and grievance mechanisms, including issues related to supplier conduct. We publish actual or potential impacts in our [2023 Sustainability Report](#). None of the reports received, investigated and addressed in 2023 related to instances of forced labor or other forms of modern slavery. We had one reported case of child labor, as covered under “Remedy” on [page 8](#).

Our Annual Sustainability Data Assurance program involves the engagement of an independent third party to review and assure our public disclosures, and our performance against key commitments. Assessment of our performance against these standards includes requirements to manage modern slavery and child labor risks. In 2023, our external assurance provider assessed performance of two of our Canadian operations (Musselwhite and Porcupine) against the Towards Sustainable Mining (TSM) standard. The sites were found to not meet all requirements of the TSM Prevention of Child and Forced Labor Protocol during 2022; the sites did not verify that candidates were over the age of 18 in the interview process, and there was no formalized process for reviewing this information within provided third-party background checks. Since this time, we have strengthened our talent acquisition process by adding a question to confirm the age of applicants, thus aligning our site practices with this TSM Protocol.

<sup>3</sup> Applied to new suppliers and suppliers whose contracts were up for renewal at sites where SRiM has been rolled out.

## COLLABORATION AND LEARNING FROM OTHERS

The risks of modern slavery and child labor are greater than any one company can resolve alone. We recognize the value of collaborating with our peers in mining and other sectors to share lessons learned and internalize best practices. We are members of several industry groups and multi-stakeholder initiatives that cover human rights issues, including modern slavery and child labor. As members of the International Council on Mining and Metals (ICMM), the World Gold Council and the Responsible Mining Initiative, we participate in numerous discussions on human rights due diligence. Through the Sustainable Business Network and Consultancy's (BSR) Human Rights Working Group, we have learned valuable lessons from a variety of other sectors on modern slavery and child labor, including discussions around approaches to remediation. Through multi-stakeholder forums such as the UN Annual Forum on Business and Human Rights, we also engage with governments, academia and civil society representatives to make sure we are listening to all points of view and identifying opportunities for future collaboration.

## FUTURE ACTIVITIES

Future activities include:

- Progress integration of former Newcrest operations and align human rights policies, standards, contract clauses and approaches, as well as learn from its best practices in modern slavery due diligence and reporting;
- Conduct site-level human rights impact assessments in Australia, Ghana and Suriname;
- Continue scaling supplier human rights training, including focused training for contract administrators and owners to build literacy and effectiveness of an integrated risk management approach;
- Develop supplier human rights guidance tools to support enterprise-wide awareness and identification of risks;
- Continue remediation of substantiated complaints through our site-level complaints and grievance mechanisms and global Integrity Helpline;
- Participate in industry initiatives to support understanding of modern slavery risks and how to improve our practices; and
- Provide input into government processes through industry associations and direct engagement.

## CONSULTATION

Our approach to modern slavery and child labor 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 2023, we actively engaged and consulted with the reporting entities listed in this report on human rights risk identification, management and implementation, including through our Australian and Canadian business unit human rights working groups. The report was prepared by our subject matter experts, who coordinated with the Australian and Canadian business units and consulted with departments across the business, including safety and sustainability, 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 and performance, see our [2023 Sustainability Report](#) and [Our Approach to Human Rights](#) on our website.*

This statement is made pursuant to the Australian Modern Slavery Act (2018) and Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (2023) and was approved by the Board of Newmont Corporation on April 24, 2024 on behalf of the reporting entities. The reporting entities covered by this joint modern slavery statement are identified on [page 14](#) of this statement.

In accordance with the requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act (the Act), and in particular section 11 hereof, I attest that I have reviewed the information contained in the report for the entities listed on [page 14](#). Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.



**Tom Palmer**  
President and Chief Executive Officer

# Appendices

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Photo : Éléonore, Canada



## APPENDIX 1

The following entities are the reporting entities from Australia and Canada, respectively, covered by this joint statement:

### Australia

- Cadia Holdings Pty Limited (ABN 95 062 648 006)
- Lihir Gold Limited (ARBN 069 803 998)
- Newcrest Mining Limited (ABN 20 005 683 625)
- Newcrest Operations Limited (ABN 80 009 221 505)
- Newmont Australia Pty Ltd (ABN 95 099 040 507)
- Newmont Boddington Pty Ltd (ABN 32 062 936 547)
- Newmont Corporation (ARBN 669 938 550)
- Newmont International Holdings Pty Ltd (ABN 53 667 812 642)
- Newmont Mining Services Pty Ltd (ABN 22 008 087 778)

- Newmont Overseas Holdings Pty Ltd (ABN 45 667 845 454)
- Newmont Tanami Pty Ltd (ABN 39 007 688 093)
- Saddleback Investments Pty Ltd (ABN 96 134 978 224)

### Canada

- Goldcorp Canada Ltd. (1180729-3)
- Goldcorp Kaminak Limited (BC1153595)
- Newmont Goldcorp Integrated Services Inc. (002657537)
- Pretium Resources Inc. (BC1369853)
- Newcrest Red Chris Mining Limited (BC1200288)

## APPENDIX 2

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

Australian Modern Slavery Act	Canadian Fighting Against Forced Labour and Child Labour in Supply Chain 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 14)	• List of the “reporting entities” covered by this joint statement
Describe the structure, operations and supply chains of the reporting entities	The reporting entity's structure, activities and supply chains	Structure, Business and Supply Chain (pages 3–4)	• 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)	The parts of the entity's business and supply chains that carry a risk of forced labor or child labor being used and the steps it has taken to assess and manage that risk	Structure, Business and Supply Chain (pages 3–4)	• Identification of categories of “high risk” goods and services

Australian Modern Slavery Act	Canadian Fighting Against Forced Labour and Child Labour in Supply Chain Act	Section(s) of this statement that satisfy the mandatory reporting criteria	Additional information
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	<p>The steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labor or child labor is used at any step of the production of goods in Canada or elsewhere by the entity or of good imported into Canada by the entity</p> <p>The reporting entity's policies and its due diligence processes in relation to forced labor and child labor</p> <p>Any measure taken to remediate any forced or child labor</p> <p>Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labor or child labor in its activities and supply chains</p> <p>The training provided to employees on forced and child labor</p>	<p>Policies and Governance (page 5)</p> <p>Our Approach (pages 6)</p> <p>Risk Assessments and Management (pages 7–8)</p> <p>Training (page 9)</p>	<ul style="list-style-type: none"> <li>• Description of our Code of Conduct and other internal policies and standards</li> <li>• Human rights risk assessments</li> <li>• Overview of our Supplier Risk Management program</li> <li>• Availability of our Integrity Helpline</li> <li>• Human rights training</li> </ul>
Describe how the reporting entities assess the effectiveness of actions being taken to reduce the risk of modern slavery practices occurring	How the entity assesses its effectiveness in ensuring that forced labor and child labor are not being used in its business and supply chains	Tracking Effectiveness (page 10)	<ul style="list-style-type: none"> <li>• Ongoing engagement and collaboration with suppliers</li> <li>• Tracking performance through complaints and grievance mechanisms</li> </ul>
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 12)	<ul style="list-style-type: none"> <li>• Consultation with reporting entities and supporting departments</li> </ul>
Any other relevant information		<p>Collaboration and Learning from Others (page 11)</p> <p>Future Activities (page 11)</p>	<ul style="list-style-type: none"> <li>• Collaboration with our peers to further enhance systems and controls</li> <li>• Overview of future activities</li> </ul>



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