

Company Name Newmont Corporation
Industry Extractive
UNGP Core Score (*) 19.0 out of 26

Score	Out of	For indicators
Governance and Policy Commitments		
2	2	A.1.1 Commitment to respect human rights
2	2	A.1.2 Commitment to respect the human rights of workers
2	2	A.1.4 Commitment to engage with stakeholders
0	2	A.1.5 Commitment to remedy
Embedding respect and Human Rights Due Diligence		
Embedding respect		
1.5	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
2	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
2	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
2	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
1	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0.5	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
Remedies and Grievance Mechanisms		
2	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
2	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
19.0	26	

(*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: UNGC principles 1 & 2: The Company 'is a participant in the United Nations Global Compact'. [Respecting Human Rights: Our Approach, 05/2020: s24.q4cdn.com <p>s24.q4cdn.com</p> <p>Score 2</p> <ul style="list-style-type: none"> Met: UNGPs: As part of the message from the President and CEO in the 2019 Sustainability Report, he states 'We remain committed to implementing the UN Guiding Principles on Business and Human Rights, and we are incorporating feedback from the [CHRB] assessment to further demonstrate our commitment'. [2019 Sustainability Report, 2020: s24.q4cdn.com]
A.1.2	Commitment to respect the human rights of workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: UNGC principles 3-6: The Company is a signatory of the UN Global Compact. [Respecting Human Rights: Our Approach, 05/2020: s24.q4cdn.com <p>s24.q4cdn.com</p> <ul style="list-style-type: none"> Met: Explicitly list All four ILO apply to EX BPs: The Company requires its suppliers 'to respect internationally proclaimed human rights and make sure that they are not complicit in human rights abuses; respect the labor rights of their employees, including freedom of association and the right to collective bargaining; prohibit all forms of forced and compulsory labor; not engage in child labor; and not discriminate in employment and occupation. These fundamental human rights are to be respected both within their own and within their affiliates' operations and supply chains.' In addition, the Code of Conduct states that every Newmont partner, vendor and contractor engaged on behalf of the Company 'is accountable for complying with Newmont's Code, Policies, Standards, Procedures, and Guidelines'. [Supplier Code of Conduct update 2020, N/A: newmont.com & Code of Conduct update 2019, 12/2019: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Explicit commitment to All four ILO Core: The Company states in its Sustainability Report the following in regards to freedom of association and collective bargaining: 'We recognize and respect our employees' right to join a union and engage in collective bargaining without interference or fear of retaliation.' Also, according to its Modern Slavery Statement, the Company does not 'tolerate any form of slavery, human trafficking, forced or child labor.' The Company has a policy against discrimination, which can be found in its Code of Conduct: 'We recruit, select, place, promote and compensate employees on the basis of their qualifications for the job and do not discriminate against one another on the basis of national origin, race, religion, sex, sexual orientation, disability or age or any other attribute that is protected by local laws'. [2019 Sustainability Report, 2020: s24.q4cdn.com & Modern Slavery Statement May 2020, 05/2020: s24.q4cdn.com Met: Respect H&S of workers: The Company is committed to protecting 'the health and safety of its employees, contractors and visitors.' [Health and Safety Policy 2014, 28/04/2014: s24.q4cdn.com] Met: H&S applies to EX BPs: The Code of conduct, which applies to business partners, vendors and contractors states that 'We are committed to an accident and injury free workplace, and to protecting the health and wellbeing of our employees. Full and consistent implementation of Newmont Goldcorp's safety

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			standards, systems and procedures is required wherever we operate.' [Code of Conduct update 2019, 12/2019: s24.q4cdn.com]
A.1.4	Commitment to engage with stakeholders	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Commits to stakeholder engagement: The Company engages 'with local communities to build productive and healthy relationships and contribute to creating shared value.' It also states that 'Stakeholder engagement plans at the corporate, regional and site level ensure we deliver on our commitment to ongoing and honest dialogue and transparent, timely and fact-based communications with our stakeholders'. [Sustainability and Stakeholder Engagement Policy, 20/04/2016: s24.q4cdn.com & 2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Regular stakeholder design engagement: The Company states the following: 'Stakeholder engagement plans at the corporate, regional and site level ensure we deliver on our commitment to ongoing and honest dialogue and transparent, timely and fact-based communications with our stakeholders. [...] In addition, stakeholder engagement helps inform our site-level management plans and validate our priorities and salient human rights issues.' In relation to host communities, the Company reports participation in social and environmental assessments (integrated environment and social impact assessment at the Sabajo Project in Suriname). [2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com]
A.1.5	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Commits to remedy: The Company states that 'we recognize our responsibility to respect fundamental human rights, mitigate risks, ensure those impacted by our activities have access to remedies and help realise many human rights through positive contributions that strengthen capacity and empower communities'. However, this information no longer seems to be publicly available on the Company website. No additional evidence found. [Social impact, 31/7/2019: newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Not obstructing access to other remedies: The Company prohibits 'retaliation toward an employee bringing forward a complaint, grievance or question'. Additionally, it states that its grievance mechanism 'ensures that stakeholders have access to other mechanisms via third-party facilitators or judicial means.' However, no evidence found of a commitment to not obstruct access to other remedies. [People Policy 2020 Update, 17/2/2020 & Respecting Human Rights: Our Approach, 05/2020: s24.q4cdn.com] Not met: Collaborating with other remedy initiatives: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. Not met: Work with EX BPs to remedy impacts: 'Suppliers should seek to address any complaints or grievances within their supply chain expeditiously (and within a maximum of 30 days)'. However, no evidence found of a commitment to work with business relationships to remedy adverse impacts, either through the business relationship's own mechanisms or through collaborating with them on the development of third-party non-judicial remedies. [Supplier Code of Conduct update 2020, N/A: newmont.com]

Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Commits to ILO core conventions: See indicator A.1.2. The Company is signatory to the UNGC Met: Senior responsibility for HR: The Executive Vice President and Chief Sustainability and External Affairs Officer has the overall responsibility for human rights. This person reports directly to the CEO. [Respecting Human Rights: Our Approach, 05/2020: s24.q4cdn.com] <p>s24.q4cdn.com</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Met: Day-to-day responsibility: The above Officer states the following: 'Day-to-day management of human rights resides with one of my team members – the Senior Vice President for External Relations and Social Responsibility.' The human resources department helps to deliver its 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 non-discriminatory treatment in employment.' The legal department 'is responsible for the contract clauses that manage supplier risk, and a range of other departments support [its] commitment to respecting the human rights outlined in the Universal Declaration of Human Rights, including the right to water'. [Respecting Human Rights: Our Approach, 05/2020: s24.q4cdn.com] <p>s24.q4cdn.com</p> <ul style="list-style-type: none"> Not met: Day-to-day responsibility for EX BRs
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Identifying risks in own operations: Met as the Company meets all requirements for Score 2 Met: identifying risks in EX business partners: Met as the Company meets all requirements for Score 2 <p>Score 2</p> <ul style="list-style-type: none"> Met: Ongoing global risk identification: The Company has a standard to be followed by all entities controlled or managed by the Company. 'It is designed to complement and enhance the requirements in Newmont's Standards on Indigenous Peoples, Land Acquisition and Involuntary Resettlement, Stakeholder Relationship Management, Cultural Resource Management and Social Baseline and Impact Assessment'. 'Sites shall maintain ongoing processes to identify, integrate and manage changes in human rights risks including through: (i) engagement with external stakeholders, (ii) capturing human rights risks in the Newmont risk management system and updating them during regular reviews (at least annually), (iii) capturing human rights related events in Newmont's event management system, and (iv) capturing human rights related complaints and grievances'. 'Assessments shall identify and evaluate actual and potential human rights impacts from: (i) the Site's own activities and; (ii) the Site's business relationships (including relationships with suppliers, security forces and governments). Special attention shall be paid to identify and address the needs of vulnerable and/or marginalized community members who may be disproportionately affected by the Sites' activities.' [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com] Met: In consultation with stakeholders: 'Assessments (integrated or standalone) shall be conducted by organizations/ individuals with demonstrable human rights expertise and credibility. Stakeholder concerns shall be addressed and documented during the assessment process. Participation shall be designed so that the process is inclusive, accessible, free from manipulation and undertaken in a timely and culturally appropriate manner'. [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com] Met: In consultation with HR experts: See above. Although the Company does not name the expert(s) consulted, the system requires specific human rights expert organisations to conduct the assessments. [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com] Met: Triggered by new circumstances: '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.)'. [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com] Met: Explains use of HRIAs or ESIA (inc HR): If deemed necessary, sites 'shall undertake a stand-alone Human Rights Impact Assessment'. HRIAs 'may be required where: (i) resettlement will take place, (ii) risk assessments or SIA/ESIAs identify a number of human rights issues which could benefit from a deeper analysis, (iii) sites are facing widespread concerns over a range of human rights, (iv) NGOs or local communities have raised concerns around human rights performance'. [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Salient risk assessment (and context): The Company indicates that it engaged internally across regions and functions and externally with human rights experts and key stakeholders to identify top salient human rights issues, and 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. This process was refreshed in 2018. [Respecting Human Rights: Our Approach, 05/2020: s24.q4cdn.com <p>s24.q4cdn.com</p> <ul style="list-style-type: none"> Met: Public disclosure of salient risks: The Company discloses each salient issue together with a description and potentially affected stakeholders in each case. Salient human rights risks include 'Right to Life', 'Right to water and sanitation', 'Right to adequate living standard', 'Right to enjoy just and favourable conditions of work', 'Discrimination in employment/occupation', 'Right to health', 'Right to not be subject to slavery and forced labour', and 'Right to self-determination'. [Respecting Human Rights: Our Approach, 05/2020: s24.q4cdn.com <p>s24.q4cdn.com</p> <p>Score 2</p> <ul style="list-style-type: none"> Met: Both requirements under score 1 met: See above.
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Action Plans to mitigate risks: 'Sites or regions (as appropriate) shall form a cross-functional human rights working group which will provide oversight for the implementation of a Human Rights Management Plan. The Human Rights Management Plan will be standalone or incorporate the following areas into existing plans of relevance: (i) the mitigation measures Sites will take to address human rights risks or impacts identified in the assessments, (ii) metrics and/or other measures to track Site's management of human rights risks or impacts, (iii) the function/department responsible and accountable for managing each human rights risk or impact, (iv) the human rights contact point for the region, (v) a tailored human rights training plan (including on the Voluntary Principles on Security and Human Rights), (vi) how complaint/grievance mechanisms will be used to identify trends in human rights complaints that may require changes to Site management systems, processes or activities, (vii) the resources required (time, human and financial) to implement the plan.' In addition, the document 'Respecting Human Rights: Our Approach' provides, for each salient issue, the relevant policies/standards, the lead functions in charge of the issue, examples of actions taken to prevent or mitigate the impacts, and specific stakeholder engagement. [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com & Respecting Human Rights: Our Approach, 05/2020: s24.q4cdn.com <p>s24.q4cdn.com</p> <ul style="list-style-type: none"> Met: Including amongst EX BPs: 'In the event that Newmont becomes aware of a human rights issue in its supply chain, Newmont shall request that the relevant supplier conduct an investigation and develop an action plan to address the issue. Newmont shall notify the supplier that it may be subject to a variety of legal implications associated with such issue, including potential termination of the contract in question.' 'Sites shall implement processes to mitigate human rights risks throughout the supplier life cycle that include, at a minimum, prequalification, training, auditing and corrective action plans'. [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com Met: Example of Actions decided: For example, in relation to the salient issue of 'self determination', the Company indicates which four documents are relevant to the issue, describes some actions taken in relation to this, including 'cultural resource management, impact assessments, complaints & grievance mechanism'. One concern identified was 'Lack of coordinated & collaborative engagement with Indigenous groups on land management programs'. In addition, it provides an example 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)'. [Respecting Human Rights: Our Approach, 05/2020: s24.q4cdn.com

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>s24.q4cdn.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Both requirements under score 1 met: See above.
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: System to check if Actions are effective: The Company requires that 'Sites shall monitor and evaluate the issues being raised through their complaint mechanisms regularly to identify trends in human rights that may require changes to management systems, processes or activities.' Also, 'Human rights management plans shall be updated on an on-going basis as risks and impacts change. Updated plans shall consider: (i) an evaluation of responses to actual and potential human rights impacts; (ii) modification to systems and process to improve performance'. [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com] • Not met: Lessons learnt from checking effectiveness: The Company reviewed its Supplier Risk Management program (SRiM): 'One important lesson learned in implementing the SRiM program is that automated processes alone are not enough to adequately identify and manage risk. Although pre-qualification screening flags potential human rights risks, the process also requires a review by individuals 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 of risk and ensures appropriate suppliers are selected for human rights training. To support our target objectives for 2020 and SRiM implementation, we worked with Verite — an independent nonprofit civil society organization working to address labor rights issues in supply chains. Verite helped identify remedies that benefit workers and companies alike as part of a human rights audit program. We piloted the program in Peru and Ghana. The pilot, which covered three suppliers, identified a need to improve worker protections such as having policies in place that explicitly reference international human rights standards, hiring from local communities, providing adequate rest, paying wages on time, and providing adequate provisions to its employees'. However, this indicator looks for evidence of lessons learnt in relation to a specific salient issue. Evidence found refers to improving processes, rather than specific measures for a particular impact/risk. The Company provided additional comments to CHRB regarding this indicator. However, evidence was not material. [2019 Sustainability Report, 2020: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met: See above
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Comms plan re identifying risks: See indicator B.2.1. The Company carries out a global risk identification and assessment process that includes both its own operations and business partners, and describes at least some features of the process. • Met: Comms plan re assessing risks: See indicator B.2.2 • Met: Comms plan re action plans for risks: See indicator B.2.3 • Not met: Comms plan re reviewing action plans: In order to be awarded this indicator, the Company has to achieve a full score in B.2.4 • Not met: Including EX business partners: In order to be awarded this indicator, the Company has to achieve a full score in B.2.2/B.2.3/B.2.4 and at least 1,5 points in B.2.1 <p>Score 2</p> <ul style="list-style-type: none"> • Met: Responding to affected stakeholders concerns: The Company provides an example of responding to stakeholder concerns: Following a series of blockades in its Mexico operations, the Company entered negotiations with the affected stakeholders with support of the government. 'Following engagement with community leaders and state and federal government officials, operations recommenced in late October [2019]. Union officials, employees, the communities and other influential stakeholders were regularly kept apprised of developments'. The Company additionally reached a water agreement with the community and signed a memorandum of understanding relating to the other issues raised. [2019 Sustainability Report, 2020: s24.q4cdn.com] • Not met: Ensuring affected stakeholders can access communications

Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Channel accessible to all workers: Workers have two options. There is 'an internal process for workers to file grievances and complaints either through their manager or a human resources representative' and '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'. [Respecting Human Rights: Our Approach, 05/2020: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Number grievances filed, addressed or resolved: In 2017, there were 33 grievances or allegations filed, 32 about discrimination in the workforce and one about security forces. Relating to discrimination: 'Seven formal grievances related to discrimination in the workforce were filed at our operations in Nevada, and one grievance was filed at the Cripple Creek & Victor operation in Colorado. Senior management and personnel in our human resources and legal departments investigated the grievances. Substantiated complaints involved discipline up to and including termination. Our Ethics Solutions Tool tracked 24 different allegations with human rights implications. Issues ranged from allegations of discrimination based on gender or race to allegations of sexual harassment'. The Company has provided more recent evidence, however, it was not possible to aggregate the total number of human rights-related complaints filed, addressed or resolved. Existing evidence is still valid. [Beyond the Mine download, 2017: sustainabilityreport.newmont.com] Met: Channel is available in all appropriate languages: The online mechanism is available in English, Spanish, and Dutch. With the telephone option 'interpreters are available in these languages 24 hours a day.' According to the Annual report, the Company has operations in the USA, Australia, Ghana, Peru and Suriname. [Ethics Point, N/A: secure.ethicspoint.com & About Ethics tool, N/A: secure.ethicspoint.com] Met: Opens own system to EX BPs workers: As indicated above, the the Integrity Line is open to external stakeholders to file complaints related to operations. [Respecting Human Rights: Our Approach, 05/2020: s24.q4cdn.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Grievance mechanism for community: As stated in C.1, the Integrity Line is available to external stakeholders. There is also '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' called the complaints and grievances mechanism and registers. In addition, the Sustainability and external relations standard (referencing a different document) states that 'Sites shall maintain community complaint and grievance mechanisms consistent with the UN Guiding Principles on Business and Human Rights. Sites shall inform the corporate S&ER team of the actions being taking to address: (i) a complaint/grievance/incident that is flagged as a human rights issue by the complainant or; (ii) a complaint/grievance/incident that has the potential or may be perceived to have a negative impact on human rights'. [Respecting Human Rights: Our Approach, 05/2020: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Describes accessibility and local languages: As described above, the Complaints & Grievances mechanism is required at all sites and that those follow the UN Guiding Principles on Business and Human Rights. [Respecting Human Rights: Our Approach, 05/2020: s24.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: EX BPs communities use global system: See above. The Company's own grievance mechanism is open to anyone who wishes to raise a complaint related to operations. [Respecting Human Rights: Our Approach, 05/2020: s24.q4cdn.com
C.7	Remedying adverse impacts and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided: The Company has provided a third part analysis of the situation in the Merian mine, which includes a list of recommendations. However, it is unclear whether the Company followed through on these recommendations. In the case of a land dispute in Peru, the Company identified three steps for addressing this and general areas of improvement. However, they don't seem related to providing remedy, as they refer to intensify dialogue and establishing action plans for implementation of improvement areas. The Company has provided comments to CHRB regarding this indicator. However, no evidence found of specific remedies provided to victims. [Lessons from a Suriname case study, 4/2017: colorado.edu & Newmont Responds to Independent Report on Land Dispute in Peru, 28/9/2016: newmontgoldcorp.com] • Not met: Says how it would remedy key sector risks: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition: The Company reviewed its Supplier Risk Management program (SRiM): 'One important lesson learned in implementing the SRiM program is that automated processes alone are not enough to adequately identify and manage risk. Although pre-qualification screening flags potential human rights risks, the process also requires a review by individuals 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 of risk and ensures appropriate suppliers are selected for human rights training. To support our target objectives for 2020 and SRiM implementation, we worked with Verite — an independent nonprofit civil society organization working to address labor rights issues in supply chains. Verite helped identify remedies that benefit workers and companies alike as part of a human rights audit program. We piloted the program in Peru and Ghana. The pilot, which covered three suppliers, identified a need to improve worker protections such as having policies in place that explicitly reference international human rights standards, hiring from local communities, providing adequate rest, paying wages on time, and providing adequate provisions to its employees'. The Company also reports in relation to learning lessons from fatalities. However, no evidence found about changes introduced. [Newmont Responds to Independent Report on Land Dispute in Peru, 28/9/2016: newmontgoldcorp.com & 2019 Sustainability Report, 2020: s24.q4cdn.com] • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Headline: 6 workers killed by a tunnel roof collapse at Newmont Ahafo gold mine in Ghana • Area: H&S • Story: On April 7th, 2018, 6 construction workers died and 2 sustained minor injuries in an accident at Newmont's Ahafo gold mine in Ghana, forcing the surface mine to suspend its operations. A tunnel roof collapsed on the workers at the construction site of an expanded gold processing plant. <p>"Operations at Ahafo have been temporarily shut and Newmont Ghana has notified families of the deceased. All other employees working in the area have been safely relocated and the scene of the accident secured," said Agbeko Azumah, external relations and communications manager. Hadded Ghana's mining inspectorate had begun investigations into the accident but he could not say immediately when operations will resume.</p> <p>In 2019, Newmont merged with Goldcorp and was renamed Newmont Goldcorp</p> <ul style="list-style-type: none"> • Sources: [Ghana Web - 05/06/2018: ghanaweb.com][Reuters - 08/04/2018: reuters.com][Bloomberg - 09/04/2018: bloomberg.com][AllAfrica - 05/06/2018: allafrica.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: The Company's President and CEO Gary Goldberg issued a statement following the collapse of the mine. "On behalf of the entire Newmont family I would like to express our deepest sorrow and extend our heartfelt condolences to the families, friends and co-workers of the victims...Our priorities right now are to support the families of those who lost loved ones in this terrible accident, and to cooperate with authorities to investigate its causes." [Ahafo mine collapse response, 04/07/2018: newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: The Company also said in a statement "A contractor crew of eight people was working inside the reclaim tunnel of the Ahafo Mill Expansion project when the roof of the tunnel collapsed. Of these eight, two individuals escaped with minor injuries. Emergency response teams were immediately dispatched to scene of the accident but six people lost their lives in the roof collapse. Newmont Ghana immediately notified authorities and is cooperating with the police in their investigation. Operations at Ahafo have been suspended, and the Ahafo Mill Expansion project will be suspended until Newmont is satisfied that work can recommence safely. Company representatives are notifying the families of the deceased, and providing them and co-workers with support and counselling." [Ahafo mine collapse response, 04/07/2018: newmontgoldcorp.com]
E(1).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The company has a health & safety policy which says, "This Policy reflects Newmont's commitment to protect the health and safety of its employees, contractors and visitors. It requires the implementation of Health and Safety (H&S) Management Standards, based on the principles of quality systems, H&S Technical Standards that address key fatal risk areas for mining and mining-related activities, and H&S Health and Hygiene Standards that minimize various risks to the health of employees, contractors and visitors." [Health & Safety Policy, 28/04/2018: newmontgoldcorp.com] • Met: Policies apply to the type of business relationships involved: The company says " Our Supplier contracts require that Suppliers comply with all applicable Newmont Goldcorp site and workplace policies, standards and procedures related to health and safety." [Supplier Code of Conduct: https://newmontgoldcorp.com & Health & Safety Policy, 28/04/2018: newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The company discloses data relating to injury rates, lost days and fatalities. [Safety Report, 2017: sustainabilityreport.newmont.com]
E(1).3	The Company has taken appropriate action	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Engages with affected stakeholders: The company in its most recent update said, "Newmont Ghana offered its condolences and support to the bereaved families of the six contractors who lost their lives on 7 April in the tragic construction accident at the Ahafo Mill Expansion project site. The company also continues to cooperate with the Inspectorate Division of the Minerals Commission to support their investigation of the accident"...."Newmont Ghana is providing support and counselling services to the families, Consar employees, as well as its employees. The Company will provide updates as new information becomes available." [Newmont Ghana Media release on Ahafo Mine incident, 04/05/2019: newmontgoldcorp.com & Ahafo mine collapse response, 04/07/2018: newmontgoldcorp.com] <p>Score 1.5</p> <ul style="list-style-type: none"> • Met: Encourages linked business to engage affected stakeholders: The company Newmont Ghana says it has engaged with the affected families and workers, along with cooperating with the inspectorate division of the minerals commission to support their investigation of the accident. [Newmont Ghana Media release on Ahafo Mine incident, 04/05/2019: newmontgoldcorp.com & Ahafo mine collapse response, 04/07/2018: newmontgoldcorp.com] • Not met: Provides remedies to affected stakeholders: The company has previously said it is providing "support and counselling services to the families, Consar employees, and its employees". Subsequently, following the release of the Inspectorate Division of the Minerals Commission's findings by the Minister of Land and Natural Resources in June 2018, Newmont said it was finalizing a long-term, comprehensive and sustainable financial assistance package for the grieving families. However there is no further public evidence that this compensation and remedy has been provided to the affected families. [2018 Beyond the Mine report,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>04/2019: newmontgoldcorp.com & Newmont Ghana Media release on Ahafo Mine incident, 04/05/2019: newmontgoldcorp.com]</p> <ul style="list-style-type: none"> • Met: Has reviewed management systems to prevent recurrence: The company in its most recent update said "The Ahafo Mill Expansion project and all surface civil construction work will remain suspended until Newmont and the authorities are satisfied that work can resume safely." It also pledged to review the report released by the Minister of Land and Natural Resources in June 2018 and work closely to follow up on each of the instructions in the report. In its 2018 'Beyond the Mine' report, the company said following an in-depth investigation into the root causes of the collapse, sites and office locations across our business held sessions on the accident's critical learnings. The company said More than 9,500 employees and contractors participated in these sessions where discussion focused on preventative actions to avoid future accidents. [2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com & Newmont Ghana Media release on Ahafo Mine incident, 04/05/2019: newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: Following the release of the Inspectorate Division of the Minerals Commission's findings by the Minister of Land and Natural Resources in June 2018, Newmont said it was finalizing a long-term, comprehensive and sustainable financial assistance package for the grieving families. However there is no further public evidence that this compensation and remedy has been provided to the affected families. [Newmont Ghana Media release on Ahafo Mine incident, 04/05/2019: newmontgoldcorp.com & GhanaWeb article, 05/06/2018: ghanaweb.com] • Met: Has improved systems and engaged affected stakeholders: In its 2018 'Beyond the Mine' report the company uses the Ahafo Mine as a case study, saying that "More than 9,500 employees and contractors participated in critical learning sessions where discussion focused on preventative actions to avoid future accidents". The case study highlighted three areas of learning in relation to the use of barriers, exclusion zones, the use of temporary structures and re-assessment of risks due to changing circumstances. Newmont says the result of these learnings was "each site identified priority actions and developed plans to address the actions and their effectiveness; We began to develop global standards for barricading and exclusion zones to support regional standard operating procedures; and We identified additional critical controls associated with our top fatality risks that must be in place every time a task involving the risk is undertaken." [2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com & Newmont Ghana Media release on Ahafo Mine incident, 04/05/2019: newmontgoldcorp.com]
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Headline: Federal court ordered Newmont to turn over evidence relating to police repression of protestors against Newmont's Conga project. • Area: Right to security - • Story: March 19, 2015: A federal US court ordered Newmont Mining to turn over evidence relating to police repression of protestors against Newmont's proposed Conga mine in northern Peru. EarthRights International (ERI) filed the request in 2014 on behalf of Elmer Eduardo Campos Álvarez, a 33-year-old Peruvian farmer. Mr. Campos was paralyzed from the waist down in 2011 when he was shot in the back while peacefully protesting near the mine. Mr. Campos, a resident of Pes Cajamarca province, where the Conga mine is planned, was among at least 24 protestors injured on November 29, 2011. He alleges he was shot by Peruvian National Police officers, under contract to Minera Yanacocha, a joint venture majority-owned and managed by Newmont. In addition to being permanently paralyzed, Mr. Campos lost a kidney and his spleen as a result of the brutality . <p>In response to the ruling, Mr. Campos stated: "I am very happy about this news that the judge in Colorado has done justice because here in Peru there is no real justice for farmers." Both a criminal investigation against the two commanding police officers and a civil lawsuit against the police are currently proceeding in Peru. The court also granted Mr. Campos' request to take a deposition of a Newmont representative.</p> <p>In 2019, Newmont merged with Goldcorp and was renamed Newmont Goldcorp</p> <ul style="list-style-type: none"> • Sources: [Mining.com - 19/03/2015: mining.com][Mines and Communities - 19/03/2015: minesandcommunities.org][Earthrights International: earthrights.org][Coordinadora Nacional De Derechos Humanos - 13/11/2017: business-humanrights.org]

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(2).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public response available: In 2011, during protests at the Conga mine, the company's CEO Richard O'Brien said "Newmont has nearly two decades of successful partnerships with the governments and communities at our Peruvian operations. We remain dedicated to the safety and security of our employees and host communities. We will continue to engage in peaceful dialogue with local community leaders and government representatives. We believe that the multi-year approval process followed by Yanacocha and the Peruvian government for the Conga project thoroughly considered impacts to the environment, including water resources in the region...Should we be unable to continue with our current development plan at Conga, the scale and diversity of Newmont's global portfolio provides us with flexibility to reprioritize and reallocate capital to maintain focus on our strategic objectives through development alternatives in Nevada, Canada, Ghana, Indonesia and Suriname." However this response was made in 2011, and no subsequent response has been provided concerning the specific case of Elmer Eduardo Campos Álvarez. [Conga Mine protest company response, 30/11/2011: newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail: Although the company's CEO at the time provided a response to the protests that occurred at the Conga mine, there has been no response since which provides sufficient detail regarding the specific case of Elmer Eduardo Campos Álvarez. [Conga Mine protest company response, 30/11/2011: newmontgoldcorp.com]
E(2).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The company says "Our human rights approach is aligned to a number of voluntary standards including the UN Guiding Principles on Business and Human Rights (the "Guiding Principles") and the fundamental requirement that we do no harm". It also has commitment to the Global Compact Principle 1 and 2. [Sustainability and Stakeholder Engagement Policy, 20/04/2016: s24.q4cdn.com & Guide to respecting Human Rights, April 2018: s1.q4cdn.com] • Met: Policies apply to the type of business relationships involved: The company's 'Sustainability and Stakeholder Engagement Policy' which refers to the Voluntary Principles on Security and Human Rights says "This Policy reflects Newmont's commitment to sustainable development. It requires all employees and contractors to comply with social, environmental, and political laws and regulations, as well as Newmont Standards. [Supplier Code of Conduct: https://newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The company says it is committed to the Voluntary Principles on Security and Human Rights "Newmont is committed to the continued implementation of the Voluntary Principles, which underpin our values and are reflected in our annual sustainability report, (Beyond the Mine - Our Social and Environmental Performance). The Voluntary Principles continue to provide a valuable framework for guiding our approach to security arrangements at our operations to help ensure we respect human rights." [Sustainability and Stakeholder Engagement Policy, 20/04/2016: s24.q4cdn.com & Annual Report on Voluntary Principles on Security and Human Rights, 02/18: s1.q4cdn.com]
E(2).3	The Company has taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: The company has provided no evidence that it has engaged with Mr. Campos-Alvarez outside of legal proceedings. [Conga Mine protest company response, 30/11/2011: newmontgoldcorp.com] • Not met: Encourages linked business to engage affected stakeholders: The company owned 51.35% of Minera Yanacocha as disclosed in its 2017 10-K filing, however there is no public evidence of the company encouraging Minera Yanacocha or any of its linked businesses to engage with Mr. Campos-Alvarez or any other of the individuals affected by the violence in the 2011 protests. [Conga Mine protest company response, 30/11/2011: newmontgoldcorp.com & 10-K Annual Report, 2018: newmontgoldcorp.com] • Not met: Provides remedies to affected stakeholders: There is no public evidence of the company providing remedy to the individuals injured by security forces during the 2011 protests. Additionally the company has been engaged in legal

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>proceedings with Mr. Campos-Alvarez and thus no remedy has been provided so far. [Conga Mine protest company response, 30/11/2011: newmontgoldcorp.com]</p> <ul style="list-style-type: none"> • Not met: Has reviewed management systems to prevent recurrence: The company has not provided any public evidence of reviewing management systems in the wake of the protests. However in its 2017 10-K filing, the company noted that "The recurrence of significant political or community opposition or protests could continue to adversely affect the Conga Project's development and the continued operation of Yanacocha", and that it..."did not anticipate being able to develop Conga for the foreseeable future". [Conga Mine protest company response, 30/11/2011: newmontgoldcorp.com & 10-K Annual Report, 2018: newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: There is no public evidence that the company has provided remedy to any of the victims involved in the 2011 protests, nor that those victims have been satisfied with any remedy offered. [Conga Mine protest company response, 30/11/2011: newmontgoldcorp.com] • Not met: Has improved systems and engaged affected stakeholders: There is no evidence that the company has reviewed its security systems, nor that it has engaged the victims and affected stakeholders since the 2011 protests. [Conga Mine protest company response, 30/11/2011: newmontgoldcorp.com]
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Headline: Newmont sued by a Peruvian farmer for physical and psychological abuse. • Area: Right to security • Story: In September 2017, Earth Rights International (ERI), together with Maxima Acuña Atalaya de Chaupe and her family, have filed a lawsuit in Delaware federal court against Newmont Mining Corporation and three of its corporate affiliates. The lawsuit seeks to stop a pattern of harassment and physical and psychological abuse that the Chaupe family reportedly suffered at the hands of security personnel working on behalf of Newmont and its corporate affiliates. The family alleges that they have been physically attacked and threatened. They also assert that Newmont's agents have destroyed their property and possessions, and killed or attacked their pets and livestock in 2011. <p>This event does not change our assessment of the severity of these. On the 11 April 2018, the federal court in Delaware granted Newmont's motion to dismiss indicating the suit belonged in Peruvian, not U.S., courts. The order issued by the court contains jurisdictional conditions that were agreeable to Newmont. In August 2018 the Chaupe family filed a brief against the US Courts decision to relocate the case to Peru, the Defense for Newmont filed a brief in September 2018 in support of the courts decision.</p> <p>In 2019, Newmont merged with Goldcorp and was renamed Newmont Goldcorp</p> <ul style="list-style-type: none"> • Sources: [RESOLVE Report of the Independent Fact finding Mission - 28/09/2016: resolve.ngo][Acuna v. Newmont Complaint" - 15/09/2017: earthrights.org][Earth Rights International - 04/05/2018: earthrights.org][Earth Rights International - 09/12/2018: earthrights.org]
E(3).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available: The Company has a number of public responses available to this land dispute which has been ongoing since 2011, the last response to the dispute is from 24 April 2018. [Chaupe land dispute company responses, 2018: newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: The company's latest response (24 April 2018) details the latest developments in the legal case between Newmont Mining and the Chaupe family in the US courts. It also details allegations of trespassing against the Acuna family, arguing that the company's responses were both responsible and lawful and complied with Peruvian law. [Chaupe land dispute company responses, 2018: newmontgoldcorp.com]
E(3).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The company says "Our human rights approach is aligned to a number of voluntary standards including the UN Guiding Principles on Business and Human Rights (the "Guiding Principles") and the fundamental requirement that we do no harm". Also, the Company is a member of the Global Compact. [Sustainability and Stakeholder Engagement Policy, 20/04/2016: s24.q4cdn.com & Guide to respecting Human Rights, April 2018: s1.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Policies apply to the type of business relationships involved: The company's 'Sustainability and Stakeholder Engagement Policy' which refers to the Voluntary Principles on Security and Human Rights says "This Policy reflects Newmont's commitment to sustainable development. It requires all employees and contractors to comply with social, environmental, and political laws and regulations, as well as Newmont Standards. [Code of Conduct: newmontgoldcorp.com & Supplier Code of Conduct: https://newmontgoldcorp.com] Score 2 • Met: Policies address the specific rights in question: The company is a signatory to the Voluntary Principles on Security and Human Rights. [Sustainability and Stakeholder Engagement Policy, 20/04/2016: s24.q4cdn.com & Annual Report on Voluntary Principles on Security and Human Rights, 02/18: s1.q4cdn.com]
E(3).3	The Company has taken appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Engages with affected stakeholders: The company in its latest response (24 April 2018) said "Since 2016, Yanacocha has focused on improving communications and relationships with members of the Chaupe family following recommendations from the 'Yanacocha Independent Fact Finding Mission.' Direct engagement with members of the family increased in frequency in 2017, indicating both parties had an interest and a desire to find a mutually beneficial resolution to the land dispute. Unfortunately, this progress was cut short in September 2017 when the Chaupe family filed the lawsuit in Delaware." [Chaupe land dispute company responses, 2018: newmontgoldcorp.com] • Met: Encourages linked business to engage affected stakeholders: The company says in a response (18 October 2016) "In the fall of 2014, U.S. based Newmont Mining Corporation (51.35% owner of Minera Yanacocha) began consulting with a number of international NGOs requesting guidance and support for a credible process to evaluate allegations associated with the land dispute. In May of 2015, Newmont formally commissioned RESOLVE – an independent non-profit organization dedicated to multi-stakeholder consensus building – to conduct an Independent Fact Finding Mission to examine the issues surrounding the land dispute." [Chaupe land dispute company responses, 2018: newmontgoldcorp.com] • Not met: Provides remedies to affected stakeholders: There has been no remedy provided to the Chaupe family by the company thus far, as legal action is still ongoing. [Chaupe land dispute company responses, 2018: newmontgoldcorp.com] • Met: Has reviewed management systems to prevent recurrence: In its response (18 October 2016) the company commissioned RESOLVE, an independent non-profit organization, to conduct a fact-finding mission into the allegations, In response to the report submitted by RESOLVE, Newmont Mining outlined a number of areas identified for improvement, relating to human rights due diligence processes and grievance mechanisms. [Chaupe land dispute company responses, 2018: newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims: There has been no satisfactory remedy offered to the Chaupe family as the legal action is still ongoing. [Chaupe land dispute company responses, 2018: newmontgoldcorp.com] • Not met: Has improved systems and engaged affected stakeholders: The company said on (18 October 2016) "Newmont and Yanacocha have committed to internally socializing the report and its findings in order to improve company performance. While we may not fully agree with some of the interpretation of events as described in the report, we recognize that the company can improve its performance in certain areas. The company has many of the components required to deliver improved performance; however, we clearly acknowledge a need to formalize, systematize, and better integrate those practices across functions in a more transparent manner that is conducive to verification." However the company has not provided any public evidence of how it has improved its performance since the release of the RESOLVE report. [Chaupe land dispute company responses, 2018: newmontgoldcorp.com]
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> • Headline: Local communities protest against environmental impact of Pueblo Viejo gold mine in Dominican Republic • Area: Environmental damage • Story: On November 6th 2017, community members of Las Piñitas, Dominican Republic, began occupying space outside the Pueblo Viejo gold mine owned by Barrick Gold Corporation (60%) and Goldcorp (40%). Goldcorp merged with Newmont in 2019 to become Newmont Goldcorp. The community members were protesting against the companies' causing the environmental damage to the Margajita River which is the community's water source. They claimed that more

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>than 600 families impacted by the project. Since the start of commercial production in 2012, community members of Las Piñitas, Las Lagunas, El Naranjo, and La Cerca have expressed their concern regarding environmental impacts, which they believe has directly impacted their health and livelihoods.</p> <p>The site was historically a small mining site, state-run from 1975 until 1999, by company Rosario Dominicana. The company's operations exposed enough sulfide ore to initiate acid mine drainage which left a community water source, the Margajita River, in an acidic state. However, the communities assert that the impacts of mining have significantly worsened since Barrick Gold Corporation and Goldcorp began operating in the area.</p> <ul style="list-style-type: none"> • Sources: [Axis of Logic, 05/12/2017: axisoflogic.com][El Caribe, 06/11/2017: elcaribe.com.do]
E(4).1	The Company has responded publicly to the allegation	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Public response available: There is no evidence that the company has publicly responded to the allegations at the Pueblo Viejo mine, nor that it has pointed to a response by another company. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Response goes into detail
E(4).2	The Company has appropriate policies in place	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised: The company states that "We recognize the right to clean, safe water and the dependence on water for hygiene, sanitation, livelihoods and the health of the environment." [Environmental stewardship - water: newmontgoldcorp.com] • Met: Policies apply to the type of business relationships involved: The company has a supply chain management policy. It states: " Newmont Goldcorp seeks to avoid, minimize, mitigate, and/or remediate negative impacts on the environment and proactively manage risks. As detailed in our Supplier contracts, Suppliers shall conduct activities in an environmentally responsible manner, including meeting all legal requirements for water and air emissions, pollution controls, chemical and waste management. [Supplier Code of Conduct: tps://newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Policies address the specific rights in question: Though the company has declared that they are 'expanding our reporting to align with new global frameworks including the CEO Water Mandate', there is no evidence that they have in fact signed CEO Water Mandate. [Message from CEO: newmontgoldcorp.com]
E(4).3	The Company has taken appropriate action	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Denies allegations, but has engaged affected stakeholders: Newmont Goldcorp's operating joint venture partner Barrick Gold said it has been speaking with the representatives of the community regarding the environmental damage and the remedies. Additionally the company said in a webcast briefing, that they have provided compensation or relocated more than 400 families who were living around the mine site and that approximately 35 families chose to remain and made it clear they had no interest in relocation. [Barrick Gold Axis of Logic article, 05/12/2017: axisoflogic.com & Barrick Gold webcast, 06/06/2018: webcast.fmav.ca] • Met: Denies allegations, but reviewed systems to prevent such impacts: Newmont Goldcorp's operating joint venture partner Barrick Gold's Juana Barcelo, the Executive Director of Barrick Gold Pueblo Viejo, said in a webcast that all pollution to the Margajita River was historical (prior to Barrick's operations), and that the water now discharged into the river was treated with "a state of the art technology, and complies with the Dominican standard and also the World Bank guidelines". She said allegations of pollution are false, and that since 2012 the company has conducted 25 monitoring events, including water sampling, the last of which was completed in March 2018, with more than 100 members from communities around the mine to ensure there was transparency. [Barrick Gold webcast, 06/06/2018: webcast.fmav.ca & Barrick Gold webcast slides, 06/06/2018: barrick.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Denies allegations, but implements review recommendations • Not met: Denies allegations, and ensures systems prevent such impacts

Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

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As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

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