

Company Name Newmont Goldcorp Corporation
Industry Extractive
Overall Score (*) 60.2 out of 100

Theme Score	Out of	For Theme
8.1	10	A. Governance and Policies
17.3	25	B. Embedding Respect and Human Rights Due Diligence
5.4	15	C. Remedies and Grievance Mechanisms
10.6	20	D. Performance: Company Human Rights Practices
11.3	20	E. Performance: Responses to Serious Allegations
7.5	10	F. Transparency

(*) Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note that Newmont Mining and Goldcorp merged as the assessment process was taking place and as such most of the assessment is based on pre-merger reporting by Newmont Mining.

Please note also 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 2019 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

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	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: UNGC principles 1 & 2: The Company 'is a participant in the United Nations Global Compact'. [2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> Not met: UNGPs: The Company reports on the UN Guiding Principles Reporting Framework. The Company 'was the first mining company to adopt the United Nations Guiding Principles on Business and Human Rights Reporting Framework.' Furthermore, it states 'Sites shall take a risk based approach to the management of human rights acting in accordance with country regulation, internationally recognized human rights frameworks (including the due diligence process in the UN Guiding Principles on Business and Human Rights) and corporate policies and associated Standards.' However, no explicit commitment to the UNGPs could be found. [2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com & Human Rights Standard, 10/2018: newmontgoldcorp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: OECD: The Company discloses the following: 'Our actions and philosophies with regard to human rights are guided by the Organization for Economic Co-operation and Development (OECD) Guidelines and reflect the United Nations' (UN) Guiding Principles on Business and Human Rights due diligence processes.' However, language such as 'guided by' and 'reflect' are not considered formal commitments following CHRB wording criteria. [Sustainability and Stakeholder Engagement Policy, 27/4/2019: newmontgoldcorp.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. [2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com] • 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 and Guidelines'. [Supplier Code of Conduct: https://newmontgoldcorp.com & Code of Conduct: newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Explicit commitment to All four ILO Core: The Company states 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, the Company does not 'tolerate any form of slavery, human trafficking, forced or child labor.' In regards to discrimination, the Company 'shall not make Employment Decisions on the basis of personal characteristics (such as gender, race, nationality, ethnic, social and indigenous origin, religion or belief, Disability, age, or sexual orientation) unrelated to requirements of the job'. [Beyond the Mine download, 2017: sustainabilityreport.newmont.com & Modern Slavery Statement, March 2018: newmontgoldcorp.com] • Met: Respect H&S of workers: The Company is committed to protecting 'the health and safety of its employees, contractors and visitors.' [Health & Safety Policy, 28/04/2018: newmontgoldcorp.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's safety standards, systems and procedures is required wherever we operate'. [Code of Conduct: newmontgoldcorp.com]
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	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: Voluntary Principles (VPs) participant: The Company 'participates in the VPSHR as part of a global effort to promote the protection of human rights.' [Sustainability Accountability, 08/04/2019: newmont.com] • Met: Respecting indigenous rights: The Company requires the following: 'Sites shall ensure full understanding of the legal rights, interests and perspectives of Indigenous Peoples in the area of influence and will acknowledge and respect the rights of Indigenous Peoples even if there is no formal recognition of these rights by a host country.' [Indigenous Peoples Standard, 1/2018: newmontgoldcorp.com] • Not met: Expects BPs to respect these rights: See above in relation to indigenous peoples standard. In its code of conduct the Company states that 'every partner, vendor and contractor engaged on behalf of the Company is accountable for complying with Newmont's Code, Policies, Standards and Guidelines'. Not clear, however, requirements to VPs or requiring security providers to be members of the International Code of Conduct of Private Security Providers Association. [Indigenous Peoples Standard, 1/2018: newmontgoldcorp.com & Code of Conduct: newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: FPIC commitment: The Company is a member of the ICMM, and works 'to obtain free, prior, and informed consent of indigenous peoples as reflected in the International Council on Mining and Metals (ICMM) Position Statement.' [Sustainability and Stakeholder Engagement Policy, 20/04/2016: newmontgoldcorp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Voluntary Guidelines on Tenure Rights • Not met: IFC performance standards: The Company has a specific land acquisition & involuntary resettlement standard'. It states its 'approach is aligned with the International Finance Corporation (IFC) Performance Standard 5'. However, no formal commitment to upholding legitimate tenure rights as set out in the IFC Performance Standards could be found. [Beyond the Mine download, 2017: sustainabilityreport.newmont.com & Land Acquisition & Involuntary resettlement, 1/2018: newmontgoldcorp.com] • Not met: Zero tolerance for land grabs • Met: Respecting the right to water: 'Newmont recognized the right to water as a salient human rights risks for its company.' The Company provides a description of the definition of right to water and sanitation. And, through the CEO water mandate domain, it explains its water strategy. It is indicated that the objective of the water strategy is 'improve the neighboring communities of the safe and plentiful water, and improved sanitation'. [Newmont Global Water Strategy, 31/7/2019: ceowatermandate.org & 2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com] • Not met: Expects BPs to commit to all these rights
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: newmontgoldcorp.com & 2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • 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 & 2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com]
A.1.5	Commitment to remedy	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: 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'. [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.' However, no evidence found of a commitment to not obstruct access to other remedies. [People policy, 28/4/2014: newmontgoldcorp.com] • Not met: Collaborating with other remedy initiatives • 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: https://newmontgoldcorp.com]
A.1.6	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs): The Company states the following: 'Our core values of integrity and responsibility support our commitment to respect human rights defenders, and we do not condone any form of attack against them or anyone who opposes our activities. We also expect our business

Indicator Code	Indicator name	Score (out of 2)	Explanation
			partners to condemn such attacks as well.' [2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com] Score 2 • Met: Expects EX BPs to reflect company HRD commitments: See above.

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: CEO or Board approves policy: The Company describes the following procedure for the approval of any new policies (including human rights): 'As an important part of Newmont's internal governance process, new or revised Global Policies and Standards are reviewed and preliminarily approved by a Global Policies & Standards Committee. Following this preliminary approval, the documents are posted for comment by employees for a minimum of 14 days, after which they are finally approved by the Global Policies & Standards Committee. Policies are then submitted for further approval by Newmont's Executive Leadership Team and Board of Directors.' [Policy and Standards, 2019: newmontgoldcorp.com] • Met: Board level responsibility for HRs: The Board gave the Safety and Sustainability Committee 'the authority to investigate any activity of the Corporation and its subsidiaries relating to health, safety, loss prevention and operational security, sustainable development, environmental affairs, relations with communities and civil society, government relations, human rights and communications matters.' [Safety and Sustainability Committee Charter, 12/2/2016: newmontgoldcorp.com] Score 2 • Met: Speeches/letters by Board members or CEO: The opening plenary for the Forum on Business and Human Rights included speakers from various businesses, talking about embedding respect for human rights in company practice and the importance of human rights due diligence, one of which being Gary Goldberg, CEO of Newmont. [Opening Plenary - Forum on Business and Human Rights 2018, 26/11/2018: webtv.un.org & 2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com]
A.2.2	Board discussions	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Board/Committee review of salient HRs: The Safety and Sustainability Committee charter indicates that is responsible for reviewing with management the Company's goals, policies and programs relative to human rights. The Committee also reviews '(i) the Corporation's policies with respect to risk assessment and risk management; (ii) the Corporation's major risk exposures; (iii) the steps management has taken to monitor and control such exposures; (iv) the effect of relevant regulatory initiatives and trends; and (v) all material claims, demands and legal proceedings against the Corporation.' The Proxy statement also contains information about the activity of the committee. [Safety and Sustainability Committee Charter, 12/2/2016: newmontgoldcorp.com & Proxy Statement 2018, 09/03/2018: d18rn0p25nwr6d.cloudfront.net] • Met: Examples or trends re HR discussion: The Chair of the Safety and Sustainability Committee of the board states the following: 'Management discussed how the SRIM program's human rights screening process, which was introduced in 2018, has strengthened the Company's ability to manage human rights risks within its supply chain. The Committee expects future programs, including training suppliers on human rights and auditing those suppliers with the highest likelihood to impact human rights, to continue to drive improvements and prevent violations.' [2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com] Score 2 • Met: Both examples and process
A.2.3	Incentives and performance management	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: Incentives for at least one board member: The Corporate Performance Bonus is composed of different indicators in order to calculate compensation. These indicators include Health and Safety (20%), and Sustainability and External Relations (5%). The former includes goals about injury rates, fatality risk management, and health risk management, and the latter includes access to water, which are considered salient human rights risks. [Proxy Statement 2018, 09/03/2018: d18rn0p25nwr6d.cloudfront.net]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: At least one key EX RH risk, beyond employee H&S: See above. Access to water is included in the performance remuneration criteria. Score 2 <ul style="list-style-type: none"> • Met: Performance criteria made public: See above.

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Commits to ILO core conventions: See indicator A.1.2 • Met: Senior responsibility for HR: The Executive Vice President of Sustainability and External Relations has the overall responsibility for human rights. This person reports directly to the CEO. [2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com] Score 2 <ul style="list-style-type: none"> • Met: Day-to-day responsibility: The day-to-day responsibility for the management of human rights resides with the 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.' [2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com] • Not met: Day-to-day responsibility for EX BRs
B.1.2	Incentives and performance management	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Senior manager incentives for human rights: The compensation of executive officers (the CFO, VP of Strategic Development, the CTO and president and COO) includes components relating to Health and Safety and Sustainability. The Company's water strategy is one of the metrics used to calculate the Corporate Performance Bonus. [Proxy Statement 2019, 2019: d18rn0p25nwr6d.cloudfront.net] • Met: At least one key EX HR risk, beyond employee H&S: As indicated above, in addition to safety-related components (which is not clear whether they cover both workers of extractive business partners and safety of local communities), water strategy (see A.1.3) is also a component of the bonus. [Proxy Statement 2019, 2019: d18rn0p25nwr6d.cloudfront.net] Score 2 <ul style="list-style-type: none"> • Met: Performance criteria made public: Health and Safety makes up 20% of the Corporate Performance Bonus and Sustainability and External Relations makes up 5%. The Company goes into further details about what weight each metric has, and the results in 2018. [Proxy Statement 2019, 2019: d18rn0p25nwr6d.cloudfront.net]
B.1.3	Integration with enterprise risk management	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: HR risks is integrated as part of enterprise risk system: In the annual report the Company includes different within its risk section, including, relations with employees (union actions, labor rates), good relation with communities, which 'can pose additional obstacles to our ability to develop our projects', water availability, etc. In relation to civil disturbance and activities, it indicates that 'the manner in which the Company's personnel national police or other security forces respond to civil disturbances and criminal activities can give rise to additional risks where those responses are not conducted in a manner consistent with international and Newmont standards relating to the use of force and respect for human rights'. The risk of water is also disclosed as sustainability risk in the 'Beyond the mine' report, which indicates the following: 'risks associated with water access and availability as NGOs, communities and governments are pressuring water-intensive industries, such as mining, to limit use'. [10-K Annual Report, 2018: newmontgoldcorp.com & 2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com] Score 2 <ul style="list-style-type: none"> • Not met: Audit Ctte or independent risk assessment

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	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: Commits to ILO core conventions: See indicator A.1.2 • Met: Communicates its policy to all workers in own operations: The Code of Conduct is available online in three different languages, English, Spanish and Dutch (and the Company provides a link to other standards translated to Spanish). Although the Code itself does not contains the ILO core standards it includes commitment to human rights and refers to 'sustainability and stakeholder engagement' policy, which do. The Code includes acknowledgement requirement for employees. Also, the Human Rights Standard is 'available on both our internal and external websites. [2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com & Governance and Ethics, 31/7/2019: newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to all 4 ILO core conventions: See indicator A.1.2 • Not met: Communication of policy commitments to stakeholder [2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com] • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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 all 4 ILO core conventions for suppliers: See indicator A.1.2 • Met: Communicating policy to EX contractors and joint ventures: The contracts given to suppliers include language requesting acknowledgement of the Supplier Code of Conduct, which requires all suppliers and business partners to adhere to the commitments made in the Code of Conduct and the Sustainability and Stakeholder Engagement Policy. [2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com & Beyond the Mine download, 2017: sustainabilityreport.newmont.com] • Met: Including to EX BPs (removed) <p>Score 2</p> <ul style="list-style-type: none"> • Met: How HR commitments made binding/contractual: The Company states the following: 'Every Newmont employee, officer, director, partner, vendor, and contractor engaged on behalf of the Company is accountable for complying with Newmont's Code, Policies, Standards and Guidelines, and all local and national laws, and applicable regulations in all countries where Newmont does business. Failure to live up to the responsibilities in our Code may result in disciplinary action, up to and including termination of employment.' As indicated above, the contracts given to suppliers (including business partners) include language requesting acknowledgement of the code. • Met: Including on EX BPs: See above.
B.1.5	Training on Human Rights	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: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments: Training on human rights is not mandatory. The Company encourages employees to participate in human rights training, and 'in 2018, over 3,000 employees voluntarily completed our online human rights training.' Between 2016 and 2017, 6,100 employees were trained on discrimination, harassment and retaliation. However, this does not cover the entire Human Rights Policy, nor was evidence found that this includes all workers. [Beyond the Mine download, 2017: sustainabilityreport.newmont.com & 2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com] • Met: Trains relevant EX managers including security personnel: The Company states the following: 'All security personnel, including contract workers, must complete annual training based on the Voluntary Principles, and Newmont encourages public security agencies to participate, as well. Each site is responsible for conducting human rights training and designing the training to address the most relevant human rights risks.' [Annual Report on Voluntary Principles on Security and Human Rights, 02/18: s1.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	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: Scores at least 1 on A.1.2 • Met: Monitoring implementation of HR policy commitments: The Company describes the following: '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.' 'In line

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>with Newmont's Interactions, Inspections and Audits Standard (NEM-IMS-STA-008), sites shall be audited against this standard to assess performance and ensure compliance with company requirements.' [Human Rights Standard, 10/2018: newmontgoldcorp.com]</p> <ul style="list-style-type: none"> • Not met: Monitoring EX BP's: The Company plans to implement audits for suppliers with an elevated likelihood of impacting human rights in 2020. However, no evidence of the Company or third parties monitoring extractive business partners currently could be found. [2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2 • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of EX supply chain monitored
B.1.7	Engaging business relationships	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: HR affects selection EXs business partners: The Company indicates that: 'As part of Newmont's vendor selection process on private security firms, we complete a screening process that includes background checks on: past incidents and allegations; training with respect to human rights, proper use of force, and weapons; affiliations with illegal activity; and any involvement in activities with human rights implications.' In addition, it is implementing the Supplier Risk Management (SRiM) program to 'improve how we assess and manage human rights risks in our global supply chain. We met our public target to develop consistent human rights pre-screening criteria that are integrated into the pre-qualification process in our SRiM program'. It also states that this global supplier management process 'provides and understanding of a supplier's overall risk profile through a pre-qualification process that includes a prohibited party, anti-bribery [...] historical and current safety performance; and social, environmental, security and human rights history'. [Annual Report on Voluntary Principles on Security and Human Rights, 02/18: s1.q4cdn.com & 2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com] <ul style="list-style-type: none"> • Not met: HR affects on-going EX business partner relationships <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met • Not met: Working with EX business partners to improve performance: However, it mentions to be putting in place supplier training programmes to support compliance and performance, no further details found including specific examples regarding extractive business partners. [2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com]
B.1.8	Approach to engagement with potentially affected stakeholders	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: Stakeholder process or systems: 'Sites shall use a Stakeholder mapping process to identify, analyze, and document individual and groups of stakeholders and their interrelationships upon entering a project area. [...] Where information cannot be gathered through direct interaction with the stakeholders, Sites shall gather the data, as available and appropriate, from relevant and credible sources. [...] Sites shall develop a systematic process to analyze stakeholder risks, conflicts, concerns, complaints and expectations identified during mapping exercises. [...] Sites shall document a stakeholder engagement plan that incorporates information from stakeholder mapping and analysis. The plan shall include: a) A summation of key stakeholder issues, concerns, and interests b) A prioritized list of stakeholders to be engaged based on their level of influence and impact c) Culturally appropriate engagement mechanisms to be used to address stakeholder issues, concerns, and interests linked to a schedule and/or timeline, and frequency d) Engagement objectives and measures of success.' This engagement includes with Indigenous Peoples. The Company reports engagement with affected stakeholders during last year in the 'beyond the mine' annual reports, including employees and host communities among others. [Stakeholder relationship management, 3/2014: newmontgoldcorp.com & 2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com] <ul style="list-style-type: none"> • Not met: Frequency and triggers for engagement: 'Data shall be reviewed by senior management and updated no less than annually or when there is a significant change in operational activity and/or when external events occur that impact stakeholders. [...] Stakeholder engagement plans shall be reviewed by senior management at least annually or more frequently as needed based upon risk and Site socio-economic complexity.' Triggers seem to be related, at least, with participation in social and environmental assessments; however, it is not clear the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>frequency of the actual engagement with affected stakeholders (evidence included here is related to the frequency of the management plan revision). [Stakeholder relationship management, 3/2014: newmontgoldcorp.com & 2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com]</p> <ul style="list-style-type: none"> • Not met: Engagement includes EX business partners workers • Met: Engagement includes EX business partners communities: As indicated above, the Company explains how it identifies groups of stakeholders, including communities, and how it engaged with them. [Stakeholder relationship management, 3/2014: newmontgoldcorp.com & 2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: '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, 10/2018: newmontgoldcorp.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, 10/2018: newmontgoldcorp.com] • Met: In consultation with HR experts: See above. [Human Rights Standard, 10/2018: newmontgoldcorp.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, 10/2018: newmontgoldcorp.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, 10/2018: newmontgoldcorp.com]
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 an site teams to determine the severity and likelihood for each issue. This process was refreshed in 2018. [2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com] • 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 favorable conditions of work',

Indicator Code	Indicator name	Score (out of 2)	Explanation
			'discrimination in employment/occupation', 'right to health', 'right to not be subject to slavery and forced labour', and 'right to self-determination'. [2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com] Score 2 • Met: Both requirements under score 1 met: See above.
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	2	The individual elements of the assessment are met or not as follows: Score 1 • 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 'Guide to respecting human rights' 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, 10/2018: newmontgoldcorp.com & 2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com] • 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, 10/2018: newmontgoldcorp.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 and complaints and grievance mechanism'. In addition, together with actions, stakeholder engagement on this issue was carried out through 'engagement with indigenous groups', 'companies, NGOs and community leaders', 'expert advisory panels (i.e. to inform FPIC practices)', 'Community members to establish cooperation agreements (i.e. in Suriname)'. [2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com] Score 2 • 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	The individual elements of the assessment are met or not as follows: Score 1 • 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, 10/2018: newmontgoldcorp.com] • Not met: Lessons learnt from checking effectiveness Score 2 • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Comms plan re identifying risks: See indicator B.2.1. The Company communicates its system to identify human rights risks and impacts. [2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com & Human Rights Standard, 10/2018: newmontgoldcorp.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Comms plan re assessing risks: See indicator B.2.2. The Company communicates how it assesses risks and for each one makes a description, stakeholders affected by each issue and relevant policies and standards in each case. [2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com & Human Rights Standard, 10/2018: newmontgoldcorp.com] • Met: Comms plan re action plans for risks: See indicator B.2.3. Following the disclosure of salient issues, the Company communicates relevant function in charge of mitigation, examples of measures taken in each case and stakeholder engagement in relation to each issue. [Human Rights Standard, 10/2018: newmontgoldcorp.com & 2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com] • Not met: Comms plan re reviewing action plans: See B.2.4. • Met: Including EX business partners: As seen in indicators b.2.1 to b.2.3 the Company considers contractors and suppliers in the context of human rights due diligence. [Human Rights Standard, 10/2018: newmontgoldcorp.com & 2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns: The Company provides a summary of key topics and areas of interest by stakeholder group, including relevant human rights topics in host communities. However, no evidence found of specific human rights concerns raised by or on behalf of stakeholders and description of how the Company responded to that specific concern. [2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com & Beyond the Mine download, 2017: sustainabilityreport.newmont.com] • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

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 also the Ethics Solutions Tool, which is 'a confidential channel for workers and external stakeholders to report any concern about compliance with our Code of Conduct, including potential human rights issues.' [2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.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.' [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.' Following the Annual report, the Company has operations in the USA, Australia, Ghana, Peru and Suriname. [Ethics Point, 9/4/2019: secure.ethicspoint.com & About Ethics tool: secure.ethicspoint.com] • Met: Opens own system to EX BPs workers: As indicated above, the Ethics Solution Tool is open to external stakeholders. [Guide to respecting Human Rights, April 2018: s1.g4cdn.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 Ethics Solutions Tool 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 (C&G) 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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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'. [2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com & Human Rights Standard, 10/2018: newmontgoldcorp.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: As described above, the Complaints & Grievances (C&G) mechanism is required at all sites and that those follow the UN Guiding Principles on Business and Human Rights. [2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com] • Met: EX BPs communities use global system: The company's own grievance mechanism is open to anyone who wishes to raise a complaint. [2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com]
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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 users to create or assess system: The Company incorporates 'feedback and input into our site-level C&G mechanism and registers from those who experience the mechanism first-hand. While the overall design of the mechanism is set forth in our standards, each site must adapt the mechanism to its specific cultural and social context to ensure the mechanism is available and responsive to local communities.' [2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com] • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: EX BPs consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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: Response timescales: The Company describes the following: 'All sites must maintain a complaints and grievances (C&G) register and ensure stakeholders know how to raise concerns. We use a three-tier system where tier 1 complaints are those that can be resolved between Newmont and complainants without the need for external mediation and/or legal proceedings. These tend to be related to matters that we directly control. If a complaint is unable to be resolved in a timely manner or relies on local systems, it is escalated to tier 2, where an independent mechanism identified by the community – such as a local leader or committee – is used. Disputes that cannot be resolved by the parties involved, typically those that require legal intervention, are categorized as tier 3.' The Company also has a target resolution time of 30 days for tier 1 complaints, with an average of 8.7 days. However, evidence found only for reporting channels for external stakeholders. Not clear the timescales for channels accessible for employees. [Beyond the Mine download, 2017: sustainabilityreport.newmont.com & 2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com] • Not met: How complainants will be informed <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level: See above, the Company reports the escalation process for the "Complaints and grievances (C&G) mechanism and registers". However, it is not clear the process for channels available for employees, as the C&G mechanism is deemed for external stakeholders [Beyond the Mine download, 2017: sustainabilityreport.newmont.com & 2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com]
C.5	Commitment to non-retaliation over complaints or concerns made	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"> • Not met: Public statement prohibiting retaliation: The company indicates that 'No employee will be retaliated against in any way for asking questions or voicing concerns about our legal or ethical obligations when acting in good faith'. However, it is not clear if this commitment is extensive to external stakeholders. [Code of Conduct: newmontgoldcorp.com] • Met: Practical measures to prevent retaliation: The Ethics Solutions Tool, available to both internal and external stakeholders, 'can accept anonymous submissions.' [Code of Conduct: newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects EX BPs to prohibit retaliation

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	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: Won't impede state based mechanisms: The Company requires sites to develop multi-tiered mechanisms to receive complaints. The third tier is for 'handling complaints that are not resolved and must be referred to official agencies or judicial processes'. However, no commitment not to impede these mechanisms could be found. [Stakeholder relationship management, 3/2014: newmontgoldcorp.com] • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
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. [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 <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition: As indicated above, the report from RESOLVE triggered some steps from the Company, however it is not clear which they are and whether they are related to prevent similar adverse impacts in the future (based on the conclusions from the report). [Newmont Responds to Independent Report on Land Dispute in Peru, 28/9/2016: newmontgoldcorp.com] • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	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: Living wage target timeframe or achieved • Not met: Describes how living wage determined <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Pays living wages • Not met: Reviews living wages definition with unions
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	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: Member of EITI: The Company is a member of EITI. [Sustainability Accountability, 08/04/2019: newmont.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Reports taxes and revenue by country: The Company disclosed in its 2017 Social and Environmental Performance Report the taxes and royalties paid to the governments of Australia, Ghana, Peru, Suriname, and the US. [Beyond the Mine download, 2017: sustainabilityreport.newmont.com]
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	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"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Company discloses the following: 'We recognize and respect our employees' right to join a union and engage in collective bargaining without interference or fear of retaliation.' However, no evidence found on measures to prohibit intimidation or retaliation. [Beyond the Mine download, 2017: sustainabilityreport.newmont.com] • Met: Discloses % covered by collective bargaining: 'Unions represent approximately 40 percent' of the Company's workforce. [Beyond the Mine download, 2017: sustainabilityreport.newmont.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Injury Rate disclosures: The Total Recordable Injury Frequency Rate. [2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com] Met: Lost days or near miss disclosures: The Company discloses its Lost Time Injury Frequency Rate. [2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com] Met: Fatalities disclosures: The Company reports in relation to fatalities [2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com] Score 2 <ul style="list-style-type: none"> Met: Set targets for H&S performance: The Company sets a zero fatalities target and a target to reduce the TRIFR by 10%. [2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com] Met: Met targets or explains why not: The Company did not met the zero fatalities target and explains the accidents that occurred. In relation to TRIFR, the Company indicates that TRIFR improved compared to 2017 and missed by 0.1%. [2018 Beyond the Mine report, 04/2019: newmontgoldcorp.com]
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Process to identify indigenous rights holders: 'Sites shall identify in their stakeholder maps Indigenous Peoples as it relates to the specific site context in a manner consistent with the principles embodied in the ICMM Position Statement on Indigenous Peoples, which can include self-determination.' However, it is not clear the process followed to identify and recognised affected indigenous peoples. The Company provided feedback sources to CHRB. However, no evidence found in these describing the process it specifically follows to identify and recognise affected or potentially affected indigenous peoples. [Indigenous Peoples Standard, 1/2018: newmontgoldcorp.com] Met: How engages with communities in assessment: The Indigenous peoples standard states: 'Sites shall design and implement an engagement plan specific for Indigenous Peoples utilizing culturally-appropriate and gender-appropriate mechanisms. In locations where Indigenous Peoples are present or could potentially be impacted by the activity, indigenous engagement shall also form part of broader engagement activities with other stakeholder groups.' 'Indigenous peoples shall participate in the design and implementation of any environmental baseline and/or impact assessment studies, in line with the legal framework of the host country'. 'Sites shall conduct a specific impact evaluation of the proposed activities on Indigenous Peoples during the design stage in consultation with Indigenous Peoples or their representatives and make necessary changes to avoid and minimize impacts and ensure appropriate restoration and/or compensation measures have been identified and included in the project design and financial analysis'. [Indigenous Peoples Standard, 1/2018: newmontgoldcorp.com] Score 2 <ul style="list-style-type: none"> Met: Commits to FPIC (or ICMM): The Company is a member of the ICMM, and works 'to obtain free, prior, and informed consent of indigenous peoples as reflected in the International Council on Mining and Metals (ICMM) Position Statement.' [Sustainability and Stakeholder Engagement Policy, 20/04/2016: newmontgoldcorp.com] Met: Gives recent example FPIC or dropping deal: The Company, as of 2017, was seeking consent before receiving exploration licenses from the government for the Amazonia exploration project. 'This involves asking the government to obtain consent from the relevant indigenous groups prior to granting the exploration permit, and we applied this approach to our Amazonia exploration project. We have received positive feedback from the indigenous community for making this effort to engage and seek consent prior to the exploration phase'. [Beyond the Mine download, 2017: sustainabilityreport.newmont.com]
D.3.6	Land rights (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: Approach to identification of land tenure rights holders Not met: Describes approach to doing so if no recent deals Score 2 <ul style="list-style-type: none"> Not met: How valuation and compensation works Not met: Steps to meet IFC PS 5 in state deals Not met: Describes approach if no recent deals

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.7	Security (in own extractive operations, which includes JVs)	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: How implements security (inc VPs or ICOC): The Company has a specific annual report on the implementation of the Voluntary Principles in which describes how it implemented its security approach during the year in Ghana, Peru and Suriname. It includes engagement with governments, communities, training, risk assessments, etc. [Annual Report on Voluntary Principles on Security and Human Rights, 02/18: s1.q4cdn.com] • Met: Example of respecting HRs in security: The Company also states that 'our contracts with private security partners and MoUs with public security agencies require recording and reporting of security-related incidents that have potential human rights implications. Incidents involving the use of force by private security are reported internally and to local and federal authorities. Newmont requires that all security related events involving private and public security are fully investigated, recorded, and corrective actions are completed. Security procedures have been developed and implemented by the regions and sites to address these matters. The security procedures follow a standardized template, but are tailored to regional and site specific conditions'. [Annual Report on Voluntary Principles on Security and Human Rights, 02/18: s1.q4cdn.com] • Met: Ensures Business Partners follow security approach: The Company indicates that 'before entering agreements, due diligence is always conducted on private/public security on their previous track records on alleged or perceived human right records. Their background is investigated to know whether they discriminate against women or vulnerable groups'. In addition, 'joint training sessions and exercises are regularly conducted to foster trust, communication and coordination between the private and public security forces. The formal review and investigation process that has been established is designed to identify security related incidents with human rights implications so appropriate corrective actions are applied'. The Company's activity in Peru, included in the report and covered by procedures, includes Minera Yanacocha, 'a joint venture with Buenaventura' where Newmont is the majority partner and operator. [Annual Report on Voluntary Principles on Security and Human Rights, 02/18: s1.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Assesses and involves communities: The Company reports on its risk management related to security in the annual report on the voluntary principles implementation. However, no evidence found of inputs from local community, including security concerns, were included in assessments. [Annual Report on Voluntary Principles on Security and Human Rights, 02/18: s1.q4cdn.com] • Met: Working with local community: The Company reports that, in its operation in Peru, it reinforced the Voluntary Principles with security forces through training to local police detachments. In addition, representatives from the operation presented on the Voluntary Principles during a number of workshops with community based security groups that exist in rural areas of Peru, called Rondas. This included the 'Annual encounter with the President of Rondas and authorities of "areas of influence"'. The Company indicates that "Rondas are traditional, volunteer police forces in rural communities which help patrol villages and the countryside. Because the volunteers are not trained in correct non-violent policing techniques and often do not have the adequate equipment, Yanacocha trains these volunteers in theory and techniques used to provide responsible security'. [Annual Report on Voluntary Principles on Security and Human Rights, 02/18: s1.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	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: Action to prevent water and sanitation risks: The Company's water strategy includes five pillars to improve water management. These include using a watershed approach, mitigating environmental and social impacts associated with water use, managing water as an asset, collaborating and engaging externally, and collaborating internally on water stewardship objectives. In relation to the risk identified about right to water and sanitation, the Company indicates that carried out the following mitigation and prevention actions: 'Environmental base studies and impact mitigation plans', 'social mitigation plans', 'spill prevention and control', 'engineering water management', 'climate adaptation action plans', 'water management plan, site charters and action plans'. It also states that it engaged with 'local and national government on community water programs', 'stakeholders within direct area of influence', 'ICMM engagement on water issues for the industry', 'Partnership with Project WET', 'Engagement with watershed management forums'. [Beyond the Mine download, 2017: sustainabilityreport.newmont.com & 2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Water targets considering local factors: The Company's 'fresh water reduction targets aim to account for [its] sites' unique water needs and challenges.' For 2018, these included a reduction of 11% in Africa, 1% in Australia, 8% in North America and 0.9% in South America, compared to 2016. Overall, this would mean a reduction of 4.2%. [Beyond the Mine download, 2017: sustainabilityreport.newmont.com] • Not met: Reports progress in meeting targets and shows trends in progress made: The 2017 target, a reduction in 3%, was met. However, there is no analysis of trends. [Beyond the Mine download, 2017: sustainabilityreport.newmont.com]

E. Performance: Responses to Serious Allegations (20% of Total)

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]
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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			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] • 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, 04/2019: newmontgoldcorp.com & Newmont Ghana Media release on Ahafo Mine incident, 04/05/2019: newmontgoldcorp.com] • 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-

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>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]</p> <ul style="list-style-type: none"> • 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 Peru's 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]
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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			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: newmontgoldcorp.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: newmontgoldcorp.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 proceedings with Mr. Campos-Alvarez and thus no remedy has been provided so far. [Conga Mine protest company response, 30/11/2011: newmontgoldcorp.com] • 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.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • 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: newmontgoldcorp.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. [Code of Conduct: newmontgoldcorp.com & 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 is a signatory to the Voluntary Principles on Security and Human Rights. [Sustainability and Stakeholder Engagement Policy, 20/04/2016: newmontgoldcorp.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

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>when the Chaupe family filed the lawsuit in Delaware." [Chaupe land dispute company responses, 2018: newmontgoldcorp.com]</p> <ul style="list-style-type: none"> • 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 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>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

Indicator Code	Indicator name	Score (out of 2)	Explanation
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

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	3.47 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Newmont Goldcorp Corporation made data public that met one or more elements of the methodology in 33 cases, leading to a disclosure score of 3.47 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company reports on GRI: The Company commits 'to report in accordance with the GRI framework' and the sustainability report includes an index. [GRI index 2017, 5/4/2019: sustainabilityreport.newmont.com] • Met: Company reports on UNGPRF: In 2015, the Company became 'one of the first six global companies – and the first in the mining industry – to adopt the UN Guiding Principles Reporting Framework (the Reporting Framework).' [2019 Guide to respecting Human Rights, 2/2019: newmontgoldcorp.com]
F.3	Key, High Quality Disclosures	2 out of 4	Newmont Goldcorp Corporation met 5 of the 10 thresholds listed below and therefore gets 2 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples

Indicator Code	Indicator name	Score	Explanation
			<ul style="list-style-type: none"> • Met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus • Met: Score 2 for A.2.3 : Incentives and performance management • Met: Score 2 for B.1.2 : Incentives and performance management • Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs) • Met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)

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

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice. The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark only and may change without notice. Any views expressed in the Benchmark only represent the views of CHRB Ltd, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither CHRB Ltd nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB Ltd's appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with English law and submitted to the exclusive jurisdiction of the courts of England and Wales.

As CHRB Ltd, 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.