

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name Newmont
Sector Extractives
Overall score 59.9 out of 100

Theme score	Out of	For theme
5.3	10	A. Governance and Policy Commitments
17.1	25	B. Embedding Respect and Human Rights Due Diligence
13.0	20	C. Remedies and Grievance Mechanisms
16.7	25	D. Performance: Company Human Rights Practices
7.8	20	E. Performance: Responses to Serious Allegations

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 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 2022 Methodology document for the sector concerned. 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 Policy Commitments (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	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: General HRs commitment: The Sustainability and Stakeholder Engagement Policy indicates: 'We respect the dignity, wellbeing and human rights of employees and the communities in which we operate, as well as others affected by our activities'. [Sustainability and Stakeholder Engagement Policy, 2020: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Commitment to UNGPs: The Sustainability and Stakeholder Engagement Policy indicates: 'We commit to implementing the OECD Guidelines for multi-national enterprises and the United Nations' Guiding Principles on Business and Human Rights'. [Sustainability and Stakeholder Engagement Policy, 2020: s24.q4cdn.com] Met: Commitment to OECD MNE Guidelines: As above [Sustainability and Stakeholder Engagement Policy, 2020: s24.q4cdn.com]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	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: Commitment to ILO core principles: See below. No publicly available policy statement committing it to respecting the human rights that the ILO has declared to be fundamental rights at work found. The Company has provided comments to CHRB regarding this indicator making reference to the different labour related policy documents it has in place, however, no policy statement committing it to respecting the human rights that the ILO has declared to be

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			<p>fundamental rights at work found. [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com]</p> <ul style="list-style-type: none"> • Not Met: Explicitly lists all four ILO core principles: The People Policy indicates: ‘we do not engage in, or condone, any form of child, forced or compulsory labor at any of our sites. [...] We do not adversely discriminate against one another on the basis of national origin, race, [...] or any other attribute that is protected by local laws’. The Labor Relations Standards notes: ‘Newmont, however, respects Employees’ rights to freedom of association and collective bargaining. Where employees choose to be represented by a labor union or collective bargaining association, Newmont will develop and maintain a collaborative working relationship with union leaders and make good faith efforts to provide a competitive employee value proposition without disadvantaging the non-union workforce. [...] Newmont will adhere to all applicable labor laws and regulations during the collective bargaining process and unionization process. Newmont recognizes Employees’ rights to freedom of association and collective bargaining, and will honor any legally authorized and properly executed collective bargaining agreement for the term of the agreement’. However, regarding the right to freedom of association and to collective bargaining, it is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as it indicates it ‘will adhere to all applicable laws’ and that ‘will honor any legally authorized’ collective bargaining agreement. The Company also refers to ILO core areas in reports. However, reports that are released on a periodic basis are not considered a suitable source for policy statements according to CHRB revised approach. The Company has provided comments to CHRB regarding this indicator making reference to the different labour related policy document it has in place, however, no commitment to respect freedom of association and collective bargaining in all contexts found. [People Policy, 2020: s24.q4cdn.com] & [Labor Relations Standard v.3.1, 2020: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects BPs/JVs to commit to ILO core principles: The Supplier Code of Conduct has explicit requirements regarding each ILO core area: discrimination, forced labour, child labour, freedom of association and collective bargaining, as indicated below. [Supplier Code of Conduct_web, N/A: newmont.com] • Met: Explicitly lists all four ILO core principles for BPs/JVs: The Supplier Code of Conduct indicates: ‘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’. The Company defines Suppliers as ‘a business or individual that provides goods or services to Newmont under terms specified in a contract’. [Supplier Code of Conduct_web, N/A: newmont.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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: Commitment to respect H&S of workers: The Code of Conduct indicates: ‘We are committed to an accident and injury free workplace, and to protecting the health and wellbeing of our employees’. [Code of Conduct, 2020: s24.q4cdn.com] • Not Met: Commitment to ILO working hours standards or 48 hour regular work week: The People Policy indicates: ‘We comply with all local laws pertaining to work hours and overtime’. The Compensation and Benefits Standard notes: ‘Newmont will comply with all local laws pertaining to compensation for working hours and overtime’. However, no evidence found of the Company explicitly committing to respect ILO conventions on working hours or that publicly states that workers are not required to work more than 48 hours as regular working week, and that overtime is consensual and paid at a premium rate. [People Policy, 2020: s24.q4cdn.com] & [Compensation and Benefits Standard v.3.1, 2020: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects BPs/JVs to commit to H&S of workers: The Supplier Code of Conduct indicates: ‘The well-being of people is Newmont’s top priority, and the right to life and right to healthy and safe working conditions are among our most salient human rights. Our goal is zero harm – defined as a workplace free from injuries and illnesses and measured by zero fatalities. Our Supplier contracts require that Suppliers comply with all applicable Newmont site and workplace policies, standards and procedures related to health and safety’. [Supplier Code of Conduct_web, N/A: newmont.com] • Not Met: Expects BPs/JVs to commit to ILO working hours standards or 48 hour regular work week: The Supplier Code of Conduct indicates: ‘Suppliers should limit hours of work (including overtime) to provide for adequate rest periods for workers

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			<p>in line with international standards'. However, it is not clear if the Company if what the Company mean by international standards in accord with the ILO conventions on working hours. Alternatively, the Company would achieve this by committing to a 48 hours regular working week, and consensual overtime paid at a premium rate. [Supplier Code of Conduct_web, N/A: newmont.com]</p>
A.1.3.a.EX	Commitment to respect human rights particularly relevant to the sector – land, natural resources and indigenous peoples' rights (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"> • Not Met: Commitment to respect land ownership/natural resources as in VGGT • Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards: The Sustainability and Stakeholder Engagement Policy indicates: 'We ensure that the rights and needs of landowners and local communities are assessed and addressed prior to any activities involving land acquisition and resettlement. Land acquisition is conducted in compliance with applicable laws, regulations, and international best practice as defined by International Finance Corporation (IFC) Performance Standard 5 and specific requirements on resettlement, compensation, and/or livelihood restoration activities'. [Sustainability and Stakeholder Engagement Policy, 2020: s24.q4cdn.com] • Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: The Indigenous Peoples Standard (Approved by the Corporate Governance Committee) indicates: 'Newmont recognizes the unique rights, culture, and history of Indigenous Peoples, and that they have distinct interests and concerns that differ from or are in addition to those of other stakeholder groups'. Also, '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 v.3, 14/01/2020: s24.q4cdn.com] • Not Met: Expects EX BPs to make these commitments: See above. The Indigenous Peoples Standard applies to 'any entity that is controlled or managed' by the Company. In addition, 'where explicitly stated in an applicable contract, it may apply to Newmont's contingent workers, vendors, contractors, and other types of business partners'. However, it is not clear it applies to all extractive business partners. Moreover, it is not clear the Company expects extractive business partners to commit to respect ownership/use of land and natural resources and respect legitimate tenure rights related to the ownership and use of land and natural resources as set out in the relevant part(s) of the Voluntary Guidelines on the Responsible Governance of Tenure (VGGT) or the IFC Performance Standards. The Cultural Heritage Standard indicates makes reference to Indigenous Peoples, however, no evidence found it expects business partners to commit to respect Indigenous Peoples and the Standard only applies 'where explicitly stated in an applicable contract'. The Company has provided additional comments to CHRB regarding this indicator. However, its content has not been found in publicly available sources. [Indigenous Peoples Standard v.3, 14/01/2020: s24.q4cdn.com] & [Cultural Heritage Standard, 2021: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing: The Stakeholder Relationship Management Standard (Approved by the Global Governance Committee) indicates: 'Engagement with Indigenous People shall adhere to the Free Prior Informed Consent (FPIC) requirements outlined within the ICMM Statement on Indigenous Peoples'. However, commitment through the ICMM position is no longer considered a formal commitment to FPIC under CHRB revised approach. This subindicator expects a direct commitment to Free, Prior Informed Consent. Moreover, the Indigenous People's Standard states: 'Newmont will work to obtain the Consent of Indigenous Peoples for new projects and changes to existing projects by focusing the process on reaching agreement on the basis for which the project should proceed'. However, 'work to obtain' is not considered a formal statement of commitment according to CHRB wording criteria. The 2022 Sustainability Report adds: 'At several sites, we have entered into formal agreements with the local and Indigenous communities to contribute to social, economic and institutional development. These agreements are developed through an open consultation process to ensure meaningful participation by communities and to promote self-determination related to the social, economic and institutional development of their communities'. However, this subindicator looks for a publicly available policy statement committing it to respecting ownership/use of land and natural resources which also includes a commitment to obtain the free prior and informed consent (FPIC) from indigenous peoples and local communities for transaction(s) involving land and natural resources. Alternatively, the Company could commit to a zero tolerance for land grabbing. Commitments are expected to

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			<p>be placed in formal policy documents. [Stakeholder Relationship Management Standard v.3, 14/01/2020: s24.q4cdn.com] & [Indigenous Peoples Standard v.3, 14/01/2020: s24.q4cdn.com]</p> <ul style="list-style-type: none"> • Not Met: Commitment to respect the right to water: The Sustainability and Stakeholder Engagement Policy indicates: ‘We recognize access to water as a human right. [...] We are committed to ensuring access to clean water, sanitation and hygiene (WASH) for all employees in the workplace’. However, ‘recognize’ is not considered a formal statement of commitment according to CHRB wording criteria, also seems to be restricted to employees. It is expected to respect right to water of affected stakeholders including local communities. The Respecting Human Rights: Our Approach discloses information on its water and sanitation management. According to this document is a salient human rights risk. The Water Management Standard explains: ‘This Global Standard sets the minimum Newmont requirements to proactively plan and manage water from exploration to post-closure in accordance with Newmont’s Global Water Strategy such that human health, stakeholder water needs, and the environment are protected’. However, no commitment to the right to water found and commitments are expected to be placed in formal policy documents. The Company has provided additional comments to CHRB regarding this indicator, which were already in use. [Sustainability and Stakeholder Engagement Policy, 2020: s24.q4cdn.com] & [Water Management Standard v.3, 2020: s24.q4cdn.com] • Not Met: Expects EX BPs to make these commitments: See above. The Stakeholder Relationship Management Standard and the Water Management Standard applies to ‘any entity that is controlled or managed’ by the Company. In addition, ‘where explicitly stated in an applicable contract, it may apply to Newmont’s contingent workers, vendors, contractors, and other types of business partners’. However, it is not clear it applies to all extractive business partners. The Supplier Code of Conduct states: ‘Our Supplier contracts include human rights clauses around: respecting human rights consistent with the Universal Declaration of Human Rights, disclosure of human rights violations, and alerting Newmont to any human rights issues Suppliers become aware of within their own or their affiliates operations or the operations of their own or their affiliates’ supply chains’. However, it is not clear the Company expects extractive business partners to commit to respect the right to water and to obtain FPIC or to have zero tolerance to land grabbing. [Stakeholder Relationship Management Standard v.3, 14/01/2020: s24.q4cdn.com] & [Supplier Code of Conduct_web, N/A: newmont.com]
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the sector – security (EX)	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Commitment to Voluntary Principles on Security and HRs: The Sustainability and Stakeholder Engagement Policy indicates: ‘We are committed to implementing the Voluntary Principles on Security and Human Rights through proactive engagement and training of personnel’. [Sustainability and Stakeholder Engagement Policy, 2020: s24.q4cdn.com] • Not Met: Uses only ICoCA members as security providers • Not Met: Commits to International Humanitarian Law: The Sustainability and Stakeholder Engagement Policy indicates: ‘We agree to external verification that our products have been recovered or sourced in a manner that does not cause or benefit unlawful armed conflict or contribute to serious human rights abuses or breaches of international humanitarian law’. The Conflict-Free Gold Standard states: ‘Through this Standard, we commit to: [...] Strengthening our engagement with suppliers of gold bearing materials in conflict-affected and high risk areas to ensure that our transactions are not causing, supporting or benefitting unlawful armed conflict or contributing to human rights abuses or breaches of international humanitarian law’. Finally, the human rights Standards indicates: ‘In relation to interactions with public and private security forces and in accordance with Newmont’s Security Performance Standard [...], Sites shall act in accordance with the VPs and respect international law principles pertaining to human rights including those outlined in the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work’. However, no policy commitment to respect international humanitarian law (IHL) found. [Sustainability and Stakeholder Engagement Policy, 2020: s24.q4cdn.com] & [Conflict-Free Gold Standard, 10/09/2020: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Expects EX BPs to commit to these rights: See above. The Sustainability and Stakeholder Engagement Policy applies to ‘any entity that is controlled or managed’ by the Company. In addition, ‘where explicitly stated in an applicable contract, it may apply to Newmont’s contingent workers, vendors, contractors, and

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			<p>other types of business partners’. However, it is not clear it applies to all extractive business partners. It is not clear it expects extractive business partners to commit to respect the VPs and IHL. The Supplier Code of Conduct states: ‘Our Supplier contracts include human rights clauses around: respecting human rights consistent with the Universal Declaration of Human Rights, disclosure of human rights violations, and alerting Newmont to any human rights issues Suppliers become aware of within their own or their affiliates operations or the operations of their own or their affiliates’ supply chains’. The Company has made reference to the 2022 Sustainability Report. However, commitments are expected to be placed in formal policy documents. No evidence found that it expects its business partners to respect the Voluntary Principles on Security and Human Rights (VPs) or to only uses security providers who are members of the International Code of Conduct of Private Security Providers Association (ICoCA) as well as to commit to respect international humanitarian law (IHL). [Sustainability and Stakeholder Engagement Policy, 2020: s24.q4cdn.com] & [Supplier Code of Conduct_web, N/A: newmont.com]</p>
A.1.4	Commitment to remedy	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Commitment to remedy adverse HRs impacts: The Human Rights Standard indicates it 'defines the minimum requirements to support and promote human rights and to enable remediation when we identify that we have caused or contributed to adverse impacts'. Although the document indicates it defines requirements to enable remedy, it is not clear it commits to it. The People Policy adds: ‘We also have a formal process for anonymously raising workplace complaints; all allegations raised through this process are appropriately investigated and corrective action is taken when merited’. However, no policy statement found committing it to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to. [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com] & [People Policy, 2020: s24.q4cdn.com] • Not Met: Expects EX BPs to make this commitments: The Supplier Code of Conduct states: ‘Suppliers should seek to address any complaints or grievances within their supply chain expeditiously (and within a maximum of 30 days)’. The document Respecting Human Rights: Our Approach provides further information on its grievance mechanism. However, no evidence found that it expects its business partners to commit it to remedy the adverse impacts on individuals and workers and communities that it has caused or contributed to. Moreover, only policy commitments are considered a suitable source for this indicator under CHRB revised approach [Supplier Code of Conduct_web, N/A: newmont.com] & [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms • Not Met: Commitment to work with EX BPs on remedy: The Respecting Human Rights: Our Approach document indicates: ‘Where a supplier has been involved in an adverse impact, we will work with them to ensure adequate remedy is provided’. However, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com]
A.1.5	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Zero tolerance of threats/attacks on HRDs: The document Respecting Human Rights: Our Approach indicates: ‘We do not tolerate threats, intimidation, violence, punitive action, surveillance or attacks (both physical and legal) against human rights defenders, including those exercising their rights to freedom of expression, association, peaceful assembly or protest against Newmont or our operations’. However, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com] • Not Met: Expects BPs to make this commitment: See above. It adds: ‘We also expect our business partners not to condone such behavior’. However, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to working with HRDs to create safe and enabling environment: The document Respecting Human Rights: Our Approach indicates: ‘While we may not always agree with positions taken by human rights defenders, we believe an active and open civil society, supported by the rule of law, is

Indicator Code	Indicator name	Score (out of 2)	Explanation
			essential'. However, no policy statement committing it to collaborating with HRDs to create a safe and enabling environment was found. Moreover, commitments are expected to be placed in Company policy documents. [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com]

A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	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: 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 management and affairs, relations with communities and civil society, government relations, human rights and communications matters'. [Safety and Sustainability Committee Charter update 2019, 23/10/2019: s24.q4cdn.com] • Met: Describes HRs expertise of Board member: The 2022 Proxy Statement indicates: 'Jane Nelson, who has a long and distinguished career advocating for sustainable business practices and is the Founding Director of the Corporate Responsibility Initiative at Harvard Kennedy School, became S&S Committee Chair in 2019, and will continue to serve as its Chair in 2022'. She serves on the Business and Human Rights Resource Centre. [2022 Proxy Statement, 21/04/2022: envisionreports.com] & [Jane Nelson CV, N/A: hks.harvard.edu] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Board member/CEO signal importance of HRs in their communications: In the 2022 Sustainability Report, Jane Nelson [Board member and Chair, Safety and Sustainability Committee] indicates in her forward letter: 'For the past few years, Newmont has focused on strengthening foundational human rights and community relations activities — identifying and managing salient risks to people, responding to complaints and grievances in a timely manner, delivering on commitments and providing local employment and procurement. Community expectations are evolving, and this will require improved social performance competencies throughout the business. Newmont's work to improve cultural heritage management practices through training and site-based action plans is an example of the Company's commitment to improving its social responsibility approach. Newmont has a reputation as an industry leader in respecting human rights. In 2022, management updated the Committee on an independent human rights assessment the Company commissioned to evaluate actual, potential and perceived impacts on human rights under a new employment model in Ghana that shifts the unionized workforce from permanent employees to fixed-term renewable employment contracts. The Committee also received updates on efforts to resolve land access and resettlement challenges related to the Ahafo North project in Ghana, and ongoing efforts to strengthen human rights oversight and capacity building of suppliers'. In a previous letter, in the 2021 Sustainability Report, the Board member notes: 'Revised in 2021, the updated standard incorporates best practices and lessons learned from the Juukan Gorge incident in Australia and from events at our own operations by clarifying accountability, creating a rigorous process to understand potential impacts, and meaningfully engaging communities to prevent unintended impacts. With six of its 12 managed sites operating on or near Indigenous territories, Newmont has worked to further its engagement with these partners by establishing the Global Center for Indigenous Community Relations (the Center) and the Advisory Council of Indigenous Community Relations. Despite ongoing challenges to community engagement due to the sustained nature of the pandemic, the Center made inroads in increasing awareness and dialogue, both internally and within the industry'. In a press release about humanitarian relief for Ukraine the CEO states: 'Newmont has a culture rooted in its values and a deep commitment to and respect for human rights'. [2021 Sustainability Report, 2022: s24.q4cdn.com] & [2022 Sustainability Report, 2023: s24.q4cdn.com]
A.2.2	Board responsibility	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: Process to review HRs strategy at board level: The Safety and Sustainability Committee duties include: 'Review with management the Corporation's goals, policies and programs relative to health, safety, loss prevention and operational security, [...] community relations, human rights, government relations and communications issues. Review with management the following items as they relate to health, safety, operational security, sustainable development, environmental management and affairs, community relations, human rights. [...]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Review with management certain audit plans and any significant findings and management’s response there to related to health, safety, loss prevention and operational security, sustainable development, environmental management and affairs, community relations, human rights, government relations and communications issues. [...] Apprise the Audit Committee of the Board of significant changes in financial risk exposures or potential accruals for contingent liabilities or disclosure issues relating to health, safety, sustainable development, [...] community relations, human rights, government relations or communications matters’. According to the 2022 Proxy Statement, the Committee met 5 times in 2021. [Safety and Sustainability Committee Charter update 2019, 23/10/2019: s24.q4cdn.com] & [2022 Proxy Statement, 21/04/2022: envisionreports.com]</p> <ul style="list-style-type: none"> • Met: Example of HRs issues/trends discussed in last reporting period: The 2021 Sustainability Report indicates: ‘The Board of Directors’ Safety and Sustainability Committee provides oversight, holding reviews with management every quarter. This year, the Committee discussed several matters including stakeholder engagement on human rights issues, managing risks with Newmont’s supplier chain, human rights audit findings, progress against public targets, employee training, reporting and public benchmarks. The Committee’s Chair apprises the full Board of any significant matters or developments’. [2021 Sustainability Report, 2022: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets both requirements under score 1: See above. • Met: Describes how affected stakeholders / HRs experts inform board discussions: The document Respecting Human Rights: Our Approach indicates: ‘As an example of how the Board considers the experiences of affected stakeholders and human rights experts, in 2022, the Safety and Sustainability Committee had a detailed discussion on a human rights assessment done in Ghana. The assessment related to the transition to a new employment model and was conducted by a group of leading human rights experts based on consultation with a number of affected stakeholders’. [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com]
A.2.3	Incentives and performance management	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: At least one board member incentive linked to HRs commitments: The 2022 Proxy Statement indicates compensation for NEOs: ‘The following compensation and benefits components are included in Newmont’s executive compensation program’. It includes the base salary, annual incentive program, Long-term Incentive Program and Benefits. The annual incentive program includes: ‘Employs a balanced portfolio of ESG, operational excellence, and growth metrics’. The 2021 Annual Company Component Incentive Program Design includes Health & Safety: Critical Control Verification Execution (10%), Fatigue and Wellbeing Risk Reduction (10%). The CEO is also a Board member. [2022 Proxy Statement, 21/04/2022: envisionreports.com] • Met: Incentive scheme linked to key HRs risks beyond employee H&S: Regarding NEO compensations, the 2023 Proxy Statement indicates: ‘Metrics included: Safety: Fatality risk management based on critical control verification execution, as measured by delivery of a target number of verifications; this is considered a leading indicator connected to preventing fatalities; Health: Fatigue risk reduction, based on development, establishment, and execution of action plans; this is also considered a leading indicator in preventing fatalities and significant accidents’. The 2022 Sustainability Report adds: ‘Our Fatality Risk Management program supports our efforts to manage one of the top risks facing our business and keep people safe and out of harm’s way. Under the program, we focus on the top 19 fatality risks common across our business, with activities involving vehicles and driving events among the highest of these risks. All top fatality risks have global standards that set the minimum mandatory requirements for everyone working on Newmont’s behalf’. [2023 Proxy statement, 2023: envisionreports.com] & [2022 Sustainability Report, 2023: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Performance criteria linked to HRs made public: The annual incentive program includes: ‘Employs a balanced portfolio of ESG, operational excellence, and growth metrics’. The 2021 Annual Company Component Incentive Program Design includes Health & Safety: Critical Control Verification Execution (10%), Fatigue and Wellbeing Risk Reduction (10%). The CEO is also a Board member. [2022 Proxy Statement, 21/04/2022: envisionreports.com] • Not Met: Review of other board incentives for coherence with HRs policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.4	Business model strategy and risks	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: Board process to review business model and strategy for HRs risks: The document Respecting Human Rights: Our Approach indicates: 'In 2016, we integrated human rights due diligence into our risk management approach so leaders and the S&S Committee are updated frequently (annually at a minimum) on key risks'. However, this subindicator looks for a description the process it has in place to discuss and review its business model and strategy for inherent risks to human rights at board level or a board committee. [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com] • Not Met: Describes frequency and triggers for reviewing business model: The 2022 Sustainability Report indicates: 'Management reviews human rights matters with the Board of Directors' Safety and Sustainability Committee every quarter and conducts a more thorough review of the Human Rights Strategy and performance against targets at least once a year'. However, this subindicator looks for a description of the frequency of and triggers for reviewing its business model or strategy and potential impacts on human rights rather than reviewing its Human Rights Strategy. [2022 Sustainability Report, 2023: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1 • Not Met: Example of actions resulting from reviews

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	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: Score of 1 on A.1.2.a: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material (assessment of this subindicator feeds from indicator A.1.2.a) • Met: Senior responsibility for HRs implementation and decision making: The 2021 Sustainability Report indicates: 'Responsibility for the management of our overall human rights approach resides with the Senior Vice President for External Relations and Social Responsibility. This role reports to the Executive Vice President and Chief Sustainability and External Affairs Officer, who reports to the President and CEO'. [2021 Sustainability Report, 2022: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes day-to-day responsibility for implementing HRs commitments: The 2021 Sustainability Report indicates: 'To embed respect for human rights throughout the company, ownership and accountabilities for performance and compliance with our policies, standards and guidelines reside in various functions. All regions are required to have working groups with cross-functional accountability for complying with our Human Rights Standard and implementing human rights management plans'. [2021 Sustainability Report, 2022: s24.q4cdn.com] • Met: Day-to-day resources and expertise allocation in own operations: The document Respecting Human Rights: Our Approach indicates: 'Our cross-functional human rights working groups at the corporate and regional/site levels monitor compliance with the Human Rights Standard and implementation of the human rights management plans. All regions are required to have working groups with cross-functional accountability for human rights risk management. Resources for managing human rights issues are allocated as part of annual business planning cycles'. [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com] • Met: Resources and expertise allocation with EX BPs: The document Respecting Human Rights: Our Approach indicates: 'Our Supplier Risk Management (SRiM) program is an end-to-end process that drives a consistent approach to managing supplier-related risks and performance. A global, cross-functional governance steering committee monitors compliance and the program's performance, and regional governance committees, which include members of the regional leadership team, review compliance and performance at a regional level'. [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com]
B.1.2	Incentives and performance management	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: Senior manager incentives linked to HRs commitments: The 2022 Proxy Statement indicates 'The annual incentive program for executive officers is a cash plan which rewards NEOs for achievement of short-term strategic objectives which are aligned to Newmont's annual goals and purpose'. It includes: 'Variable cash

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>compensation is based on the level of achievement toward annual performance objectives that support ESG, operational excellence, and growth performance goals'. 'The annual incentive program includes: 'Employs a balanced portfolio of ESG, operational excellence, and growth metrics'. The 2021 Annual Company Component Incentive Program Design includes Health & Safety: Critical Control Verification Execution (10%), Fatigue and Wellbeing Risk Reduction (10%). [2022 Proxy Statement, 21/04/2022: envisionreports.com]</p> <ul style="list-style-type: none"> • Met: Incentive scheme linked to key HRs risks beyond employee H&S: Regarding NEO compensations, the 2023 Proxy Statement indicates: 'Metrics included: Safety: Fatality risk management based on critical control verification execution, as measured by delivery of a target number of verifications; this is considered a leading indicator connected to preventing fatalities; Health: Fatigue risk reduction, based on development, establishment, and execution of action plans; this is also considered a leading indicator in preventing fatalities and significant accidents'. The 2022 Sustainability Report adds: 'Our Fatality Risk Management program supports our efforts to manage one of the top risks facing our business and keep people safe and out of harm's way. Under the program, we focus on the top 19 fatality risks common across our business, with activities involving vehicles and driving events among the highest of these risks. All top fatality risks have global standards that set the minimum mandatory requirements for everyone working on Newmont's behalf'. [2022 Sustainability Report, 2023: s24.q4cdn.com] & [2023 Proxy statement, 2023: envisionreports.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Performance criteria linked to HRs made public: The annual incentive program includes: 'Employs a balanced portfolio of ESG, operational excellence, and growth metrics'. The 2021 Annual Company Component Incentive Program Design includes Health & Safety: Critical Control Verification Execution (10%), Fatigue and Wellbeing Risk Reduction (10%). [2022 Proxy Statement, 21/04/2022: envisionreports.com] • Not Met: Review of other senior management incentives for coherence with HRs policies
B.1.3	Integration with enterprise risk management	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: HRs risks integrated as part of enterprise risk system: The 2021 Sustainability Report indicates: 'Our global Risk Management System (RMS) is designed to guide business leaders so that we successfully manage risk and achieve our strategic objectives. [...] In 2021, we began implementing our redesigned Risk Management System (RMS)'. Regarding the management of social risks, it expands: 'Our structured global Risk Management System (RMS) includes a hierarchy of policies, standards, guidelines and procedures to assess the full range of social risks, regulatory requirements and obligations. Our Social Baseline and Impact Assessment Standard requires each operating site to update its social impact assessment — which provides critical information about social baseline conditions and potential impacts of our business activities — at least every five years. [...] Findings from the studies are addressed through social management plans that aim to mitigate and minimize impacts while enhancing the benefits associated with mining activities. Other global standards — including those that address human rights, Indigenous peoples, land acquisition and resettlement, and cultural heritage — establish the minimum requirements for managing our social risks and opportunities. Sites are regularly audited to ensure conformance to our standards and to promote continuous improvement'. The document Social Baseline & Impact Assessment Standard notes: 'Potential impacts identified in the SIA [social impact assessment] shall be registered in the Site risk management system and updated during management system quarterly reviews'. [2021 Sustainability Report, 2022: s24.q4cdn.com] & [Social Baseline & Impact Assessment Standard, 2020: s24.q4cdn.com] • Met: Provides an example: The document Respecting Human Rights: Our Approach indicates: 'in 2019, a Human Rights Impact Assessment conducted in Ghana included a section on Business Partners and the Rights to Freedom of Association, Life, Health, Non-Discrimination and the Right to Enjoy Just and Favorable Conditions of Work'. The webpage section Respecting Human Rights publishes various HRIAs. The HRIA of Newmont Ghana's Fixed-Term Contract Employment Model notes: 'One of the key risks that Newmont will need to manage and mitigate is the potential abuse of performance metrics to facilitate the termination of an employee or otherwise discriminate against employees who are critical of the company, or who have advanced credible claims of mistreatment by their supervisors. There are also risks that the performance metrics could be used to increase productivity in a way that overworks employees and/or jeopardizes

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>occupational health and safety. This is especially the case for vulnerable workers. Additionally, local workers expressed concern that the new employment model could be used to phase them out or deny them promotions'. It also discloses extensively key recommendation to address possible risks in relation to Policy, Performance Assessments & Metrics, Union Representation, Vulnerable Workers and Due Diligence. As indicated above, HRIAs are part of its global Risk Management System. [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com] & [Ghana - Human Rights Risk Assessment, 25/03/2022: s24.q4cdn.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Risk assesment by Audit Committee or independent third party: The 2022 Sustainability Report indicates: 'PricewaterhouseCoopers (PwC) is conducting a review of Newmont's RMS [Risk Management System] in order to provide limited assurance over the assertions made by Newmont with respect to completion of certain 2022 milestones in the integration of the RMS system'. However, although the Company indicates that PwC is conducting a review of Newmont's RMS, no further description found of how it assesses the adequacy of the enterprise RMS in managing human rights during the company's last reporting year. [2022 Sustainability Report, 2023: s24.q4cdn.com]
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	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: Score of 1 on A.1.2.a: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. This subindicator automatically feeds from A.1.2.a • Not Met: Communicates HRs policies to all workers in own operations: The 2021 Sustainability Report indicates: 'Our online employee human rights training program is designed to raise awareness about the Company's human rights commitments, potential risks, and the importance of everyone working on our behalf to prevent and address potential human rights violations. We updated the training at the end of 2020 to incorporate more case studies and offer the courses in Dutch, English, French and Spanish. As of the end of 2021, over 3,000 employees had voluntarily completed the training'. However, it is not clear if everyone receives this training. The document Respecting Human Rights: Our Approach notes: 'The Standard, as well as all of our global policies and Human Resource Standards, are available on both our internal and external websites in all Newmont's working languages (Dutch, English, French, Spanish), making them accessible to employees [...]'. The 2022 Sustainability Report explains: 'Newmont requires all employees and directors to acknowledge understanding of and adherence to our Code upon joining the organization and on an annual basis. Employees with regular computer access at work must complete additional online courses on specific integrity and compliance topics at least once a year. Regular and targeted in-person, virtual and online training is made available to employees to address Code-related issues relevant to their region and/or function. We also focus on tailored training programs to share lessons learned from actual cases that happened at Newmont'. The Code of Conduct indicates: 'Our commitment to sustainability includes the promotion of fundamental human rights, especially of those who live in the communities where we operate and those with whom we work. Please see our Sustainability and Stakeholder Engagement Policy for more on these topics'. However, although the Code of Conduct mentions its commitments to human rights, it does not seem to contain most of its human rights policy commitments. No description found on how it proactively communicates its policy commitment to all its workers, including in local languages where necessary. [2021 Sustainability Report, 2022: s24.q4cdn.com] & [2022 Sustainability Report, 2023: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communicates HRs policies to stakeholders: The 2022 Sustainability Report indicates: 'Our global standards — including those related to managing stakeholder relationships, human rights and Indigenous peoples — require consistent engagement processes across all sites while ensuring each site's approach is culturally appropriate and responsive to local stakeholders. This includes having a comprehensive plan to effectively engage those who are or potentially could be impacted by our business activities'. However, no description found on how the Company actively communicates its policy commitments to affected stakeholders, including local communities. [2022 Sustainability Report, 2023: s24.q4cdn.com] • Not Met: Example of how HRs policies are accessible for intended audience: The 2022 Sustainability Report discloses information on Social impact assessment and engagement practices at site level, including data on: Social Impact Assessment (SIA) is conducted at this site; year of most recent SIA. Site's stakeholder

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>engagement plans are based on stakeholder mapping. Site engages with broad-based local community consultation committees that include vulnerable groups. Site engages with works councils, occupational health and safety committees and other worker representation bodies to deal with social impacts. Site has formal local community grievance process. It adds: 'Our global standards — including those related to managing stakeholder relationships, human rights and Indigenous peoples — require consistent engagement processes across all sites while ensuring each site's approach is culturally appropriate and responsive to local stakeholders. This includes having a comprehensive plan to effectively engage those who are or potentially could be impacted by our business activities. [...] We are updating our annual stakeholder engagement plans to include more information on tailings management and emergency preparedness related to tailings facilities and other potentially catastrophic risks'. However, this subindicator looks for an example of how it ensures the form and frequency of the communication of its human rights policy commitments is accessible to its intended audience. [2022 Sustainability Report, 2023: s24.q4cdn.com]</p>
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Describes steps to communicate HRs policies to EX BPs: The Modern Slavery Statement indicates: 'Through contract terms, MOUs, standard operating procedures and supplier trainings, we make our suppliers and business partners aware of our human rights commitments including commitments to the Voluntary Principles on Security and Human Rights, the requirements in our Cultural Heritage, Indigenous Peoples, and Water Management standards. We reinforce these commitments with governments, joint venture partners, (even where we are not the operator) and minority interests'. The document Respecting Human Rights: Our Approach adds: 'Our vast, complex global supply chain provides goods and services throughout the mine lifecycle. We recognize that this complexity exposes us to certain risks — including those with the potential to impact human rights. To manage these risks, we set out clear expectations for our suppliers in our Supplier Code of Conduct ("Supplier Code"), which is publicly available on our website, and supplier contracts include language requiring suppliers' acknowledgement of the Supplier Code'. [2021 Modern Slavery Statement, 2022: s24.q4cdn.com] & [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes how HRs policies are contractual/binding for suppliers: The Supplier Code of Conduct indicates: 'Our Supplier contracts include human rights clauses around: respecting human rights consistent with the Universal Declaration of Human Rights, disclosure of human rights violations, and alerting Newmont to any human rights issues Suppliers become aware of within their own or their affiliates operations or the operations of their own or their affiliates' supply chains'. [Supplier Code of Conduct_web, N/A: newmont.com] • Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs: See above. The Supplier Code of Conduct adds: 'Suppliers, and all sub-contractors working on their behalf, are expected to review and fully understand the content of this Supplier Code and to comply with all provisions specified in their contracts including provisions, which relate to the content of this Supplier Code'. [Supplier Code of Conduct_web, N/A: newmont.com]
B.1.5	Training on Human Rights	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: Score of at least 1 on A.1.2.a: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. This subindicator automatically feeds from A.1.2.a • Met: Describes how workers are trained on HRs policy commitments: The 2021 Sustainability Report indicates: 'Our online employee human rights training program is designed to raise awareness about the Company's human rights commitments, potential risks, and the importance of everyone working on our behalf to prevent and address potential human rights violations. We updated the training at the end of 2020 to incorporate more case studies and offer the courses in Dutch, English, French and Spanish. As of the end of 2021, over 3,000 employees had voluntarily completed the training'. [2021 Sustainability Report, 2022: s24.q4cdn.com] • Met: Trains relevant managers including security on HRs: The 2021 Sustainability Report indicates: 'All Newmont security personnel must complete annual training based on the Voluntary Principles on Security and Human Rights, and we encourage public security agencies to participate as well'. [2021 Sustainability Report, 2022: s24.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Met: Meets both requirements under score 1 • Met: Trains BPs to meet HRs commitments: The Company indicates: 'Our online supplier training program focuses on suppliers with an elevated potential for human rights risks. The primary objectives of the program are to: Clearly state Newmont's expectations for supplier performance on human rights (including those outlined in our Supplier Code of Conduct); Review labor rights in the context of international frameworks and expectations, emphasizing freedom of association and collective bargaining rights; and Provide additional information, resources and tools to help suppliers identify and address possible human rights risks associated with their activities'. [2021 Sustainability Report, 2022: s24.q4cdn.com] • Met: Discloses % suppliers trained: The 2022 Sustainability Report indicates: 'We conducted in-person human rights training to over 60 potential high-risk suppliers in Ghana and Peru. We exceeded our target of implementing mitigation plans for 80 percent of high-risk suppliers in Peru (100 percent), but fell just short in Ghana (73 percent)'. Moreover, it provides figures on In-person human rights workforce trainings at Site level in different parts of the world. The total number of contractor/supplier participants was 1,625. It also indicates that the total number of contractors is 17,823. With the given figures, percentage of suppliers trained can be inferred. [2022 Sustainability Report, 2023: s24.q4cdn.com]
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"> • Not Met: Score of at least 1 on A.1.2.a • Met: Monitors implementation of HRs policy commitments across global ops and EX BPs: The 2021 Sustainability Report indicates: 'Our structured global Risk Management System (RMS) includes a hierarchy of policies, standards, guidelines and procedures. [...] Sites are regularly audited to ensure conformance to our standards and to promote continuous improvement'. As for suppliers, 'In 2021, all Newmont sites that have fully implemented our Supplier Risk Management (SRiM) program (five out of 12 operating sites) screened 100 percent of their new suppliers using human rights criteria as part of the supplier pre-qualification process. [...] Supplier audits were completed in Australia and Peru with Peru's findings reported in last year's sustainability report. There were no significant findings from the audit in Australia; however, there were recommendations for improvement related to policies, training, processes and human resource management. In Ghana, two audits were initiated but not completed due to a lack of buy-in from the suppliers and constraints with conducting remote audits during the pandemic. Early findings raised an issue with one supplier using subcontractors who were working without contracts'. [2021 Sustainability Report, 2022: s24.q4cdn.com] • Not Met: Discloses % of EX BP's monitored: The 2022 Sustainability Report indicates: 'As of the end of 2022, seven operating sites and the corporate office have fully implemented SRiM [Supplier Risk Management], assigning suppliers a tier risk rating and creating appropriate risk mitigation plans in line with SRiM's requirements'. It also discloses data on Human rights supplier screening, including: Number of suppliers requested to complete pre-qualification questionnaire (PQ); Number that responded to the PQ and provided data on human rights risks; Number identified through the PQ as having an elevated likelihood of impacting human rights. However, this indicator looks for the proportion of its extractive business partners that is monitored. No further evidence found. [2022 Sustainability Report, 2023: s24.q4cdn.com] • Not Met: Describes how workers are involved in monitoring: The Company has provided comments to CHRB regarding this indicator. However, evidence was not material. This subindicator looks for a description of how the Company's workers are involved in the monitoring process. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Score of 2 on A.1.2.a • Not Met: Describes corrective actions process: The Human Rights Standard indicates: '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'. The document Respecting Human Rights: Our Approach adds: 'Where issues have been identified through audits, Newmont works directly with suppliers to support them in meeting our requirements. For example, in Peru, Newmont engaged extensively on an ongoing basis with suppliers who had been audited to ensure they addressed recommendations from the audits, including supporting them with the development of relevant policies'. However, no further information describing the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>corrective action process regarding the whole group was found. This indicator looks for the standard process (steps) it has in place to implement corrective action plans where non-compliances are found as part of the monitoring process. [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com] & [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com]</p> <ul style="list-style-type: none"> • Not Met: Discloses findings and number of correction action processes
B.1.7	Engaging and terminating 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: HRs performance affects selection EX BPs: The 2021 Sustainability Report indicates: 'All Tier 1 and Tier 2 suppliers were issued pre-qualification questionnaires related to social, environmental, human rights, health and safety, ethics and compliance, security and information technology risks. Each scope of work was analyzed against additional risk indicators, resulting in a Tier Risk Rating. Supplier responses determined whether a risk mitigation activity (e.g., a relevant risk management plan) was necessary and activated along with a scope of work'. [2021 Sustainability Report, 2022: s24.q4cdn.com] • Met: HRs performance affects ongoing BPs relationships: The document Respecting Human Rights: Our Approach indicates: 'Suppliers receive a human rights risk rating that dictates mitigation measures (such as training or audits) when needed. [...] Where suppliers have not fully implemented Newmont's requirements (for example, undertaken training), this directly impacts decisions on whether to renew their future contracts'. [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes positive HRs incentives for business relationships • Met: Works with EX BPs to meet HRs requirements: The 2021 Sustainability Report indicates: 'Our online supplier training program focuses on suppliers with an elevated potential for human rights risks. The primary objectives of the program are to: Clearly state Newmont's expectations for supplier performance on human rights (including those outlined in our Supplier Code of Conduct); Review labor rights in the context of international frameworks and expectations, emphasizing freedom of association and collective bargaining rights; and Provide additional information, resources and tools to help suppliers identify and address possible human rights risks associated with their activities'. [2021 Sustainability Report, 2022: s24.q4cdn.com]
B.1.8	Approach to engagement with affected stakeholders	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: Describes how workers and communities identified and engaged in the last two years: The Company has a Stakeholder Relationship document where it indicates how to identify stakeholders: '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. Data from this analysis should be used to update the Site and/or regional enterprise risk management system and/or issues register as appropriate on an annual basis or more frequently as appropriate'. As for the engagement planning, it expands: 'A summation of key stakeholder issues, concerns, and interests. A prioritized list of stakeholders to be engaged based on their level of influence and impact. Culturally appropriate engagement mechanisms to be used to address stakeholder issues, concerns, and interests linked to a schedule and/or timeline, and frequency. Engagement objectives and measures of success'. The Company discloses different engagement with indigenous communities in 2021. [Stakeholder Relationship Management Standard v.3, 14/01/2020: s24.q4cdn.com] & [2021 Sustainability Report, 2022: s24.q4cdn.com] • Met: Provides two examples of engagement with stakeholders: The Company discloses examples of engagement with different Indigenous communities in 2021. On example is the Cree Nation of Wemindji Grand Council of the Crees (Eeyou Istchee)/Cree Nation Government: 'The site conducted a citizen perception study in Wemindji with 48 community members participating. The final report was completed in July 2021 and highlighted the need to better inform the community on all aspects of the mine. In early 2022, the site hired a liaison officer from the Cree Nation of Wemindji to address this feedback. [...] Land users from the community of Wemindji were invited to voice their concerns on the state of the lake sturgeon population in the area of the Opinaca reservoir'. Another instance of engagement was with the Pamaka Maroon Tribe of the Marowijne River Kawina

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Maroon Tribe of the Commewijne River: 'Both the Kawina and Pamaka tribes are traditional landowners within the Merian mining license area. Negotiations on a Cooperation Agreement with the Kawina were delayed due to COVID-19 but continued in 2021. During the year they met 11 times, and negotiations are expected to be completed in 2022'. [2021 Sustainability Report, 2022: s24.q4cdn.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Analysis of stakeholder views on company's HRs issues: The 2022 Sustainability Report indicates that 'At the end of 2022, all sites — except Akyem, Musselwhite and Yanacocha — had a social impact assessment (SIA) in place and updated within the past five years'. It adds: 'Each operating site must update its social impact assessment (SIA) at least every five years per our Social Baseline and Impact Assessment Standard, and the SIA must include human rights considerations'. The Social Baseline & Impact Assessment Standard notes: 'Sites will validate and routinely update SIA data using environmental and social monitoring systems and ongoing stakeholder engagement'. The Sustainability Report Report discloses: 'Top actual and/or potential community impacts and mitigation responses' by Site level. For example, in Ghana [Akyem]: 'Concern and complaint of loss of livelihoods to farmers due to economic and physical displacement'. In Peru [Yanacocha]: 'Expectations that Yanacocha will solve the village's water problems'. [2022 Sustainability Report, 2023: s24.q4cdn.com] & [Social Baseline & Impact Assessment Standard, 2020: s24.q4cdn.com] • Not Met: Describes how stakeholders views influenced company's HRs approach: See above. The 2022 Sustainability Report discloses samples of management response to mitigate impact encountered. For instance, in the case of Akyem: 'In response to complaints from Project Affect Persons (PAP) and farmers regarding the delay in continuation of proposed livelihood interventions, the site implemented the recommendations of the Socio-economic assessment conducted by PAP. This included the implementation of the Akyem Social Protection Program and the Agricultural Improvement Program through the National Forest Liaison Group/ Environmental Protection Agency and discussions rolled out for the implementation of the Alternative Livelihood Program'. As for Yanacocha: 'Minera Yanacocha (MY) will work to address this expectation, including implementing safety measures necessary to address any immediate incidents (i.e., entry onto site by residents), hosting meetings to address any claims made by the residents and providing any related updates based on water treatment testing the site has conducted. The site has made agreements with the residents that MY will monitor and evaluate the springs to verify the feasibility of using water from the springs or MY would build a micro reservoir for the hamlet'. However, current evidence seems to be focusing in re-educating concerns raised, rather than the Company acknowledging input from affected stakeholders on human rights and integrating it in its approach. [2022 Sustainability Report, 2023: s24.q4cdn.com]

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	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: Describes process of identifying risks in own operations: The Human Rights Standard indicates: '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. [...] Our workforce and external stakeholders, inclusive of affected communities, shall be provided with ongoing opportunities to express their views on potential human rights risks, impacts, and mitigation measures. [...] Assessments shall identify and evaluate actual and potential human rights impacts from: (i) the Site's own activities and; (ii) the Site's business relationships (including relationships with suppliers, security forces and governments). Special attention shall be paid to identify and address the needs of vulnerable and/or marginalized community members who may be disproportionately affected by the Sites' activities'. [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com] • Met: Describes process for identifying risks in EX BPs: See above, it includes identification of actual and potential human rights impacts the Site's business relationships. [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes global risk identification system incl. stakeholder consultation: As indicated above, the ongoing identification process involving consultation with affected stakeholders. It adds: 'Assessments (integrated or standalone) shall be conducted by organizations/ individuals with demonstrable human rights expertise and credibility'. The 2021 Sustainability Report indicates: 'As stated in our Human Rights Standard, all sites must maintain processes to identify, integrate and manage human rights risks on an ongoing basis. For new projects or significant changes to existing operations, sites must integrate human rights evaluations into their impact or risk assessments and consider undertaking standalone human rights impact assessments (HRIAs) under certain circumstances'. The webpage section Respecting Human Rights discloses the examples of HRIAs carried out in different locations. [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com] & [2021 Sustainability Report, 2022: s24.q4cdn.com] • Met: Describes how risk identification system is triggered by new circumstances: The Company also states: 'For new projects or significant changes to existing operations, Sites shall integrate an evaluation of human rights into their assessments (social impact assessments, risk assessments etc.)'. [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com] • Not Met: Describes risks identified in relation to new circumstances: The Company has provided sources to CHRB regarding this indicator disclosing the results of different HRIAs [human rights impact assessment]. Three of these HRIAs are is considered outdated according to the CHRB three-reporting-year timeframe policy. The HRIA of Newmont Ghana's Fixed-Term Contract Employment Model does not seem to disclose risks. It has also referred to a Conflict -Free Gold report. Moreover, it made reference to its salient human rights risks found in the document Respecting Human Rights: Our Approach. However, this indicator looks for a description of their risks identified specifically when its global system to identify human rights risks is triggered by new country operations, new business relationships, new human rights challenges or conflict affecting particular locations. No further evidence found. [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com] & [Ghana - Human Rights Risk Assessment, 25/03/2022: s24.q4cdn.com]
B.2.2	Assessing 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: Describes assessment process and discloses salient HRs risks: The Company indicates: '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.). [...] 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. [...] Sites shall undertake a stand-alone Human Rights Impact Assessment (HRIA) if it is deemed necessary in their operating context. [...] 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. [...] In line with Newmont's Social Baseline and Impact Management Standard [...], assessment processes incorporating human rights will be updated and validated no less than every five years or when risks to human rights significantly change, whichever is more frequent'. It also states that assessments (integrated or standalone) shall be conducted by organizations/individuals with demonstrable human rights expertise and credibility. Stakeholder concerns shall be addressed and documented during the assessment process. Participation shall be designed so that the process is inclusive, accessible, free from manipulation and undertaken in a timely and culturally appropriate manner'. [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com] • Met: Describes how process applies to EX BPs: See above, the assessment includes 'the Site's business relationships (including relationships with suppliers, security forces and governments)'. [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com] • Met: Public disclosure of results of HRs risk assessment: The 2021 Sustainability Report indicates: 'Currently, our eight salient issues are related to: Right to life; Right to water and sanitation; Right to an adequate standard of living; Right to enjoy just and favorable conditions of work; Right not to be subject to

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>discrimination in employment or occupation; Right to health; Right not to be subject to slavery or forced labor; Right to self-determination'. [2021 Sustainability Report, 2022: s24.q4cdn.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1: See above. • Met: Describes how assessment involved affected stakeholders: As indicated above, the Company systematically conducts assessments and, as indicated in the Respecting Human Rights: Our Approach, engagement is a central part of these assessment: 'a number of our standards include requirements around triggers for engagement and for monitoring the effectiveness of engagement. These include: Involving affected communities in baseline assessments and social impact assessments at the exploration phase and prior to initiation of site alternatives analysis and updating these studies every five years or more frequently as needed (Social Baseline and Impact Assessment Standard)'. It is showcased in the Human Rights Risk Assessment of Newmont Ghana's Fixed-Term Contract Employment Model: 'The Assessment includes input from 21 stakeholders, including rights-holders most likely to be affected by the company's business decision and civil society organizations that represent the interests of those rights-holders'. There is evidence of engagement in the other HRIAs published in the Company's webpage. [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com] & [Ghana - Human Rights Risk Assessment, 25/03/2022: s24.q4cdn.com]
B.2.3	Integrating and acting on human rights risks and impact assessments	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: Describes system to prevent, mitigate and remediate HRs issues: The Human Rights Standard indicates: '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'. [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com] • Met: Describes how global system applies to EX BPs: The Human Rights Standard indicates: 'In the event that Newmont becomes aware of a human rights issue in its supply chain, Newmont shall request that the relevant supplier conduct an investigation and develop an action plan to address the issue. Newmont shall notify the supplier that it may be subject to a variety of legal implications associated with such issue, including potential termination of the contract in question. [...] Sites shall implement processes to mitigate human rights risks throughout the supplier life cycle that include, at a minimum, prequalification, training, auditing and corrective action plans'. [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com] • Met: Example of actions decided on at least 1 salient HRs issue: The 2021 Sustainability Report indicates various examples of 'Actual and/or potential community impacts and mitigation responses' by site level. For instance, in Ghana, for the impact: 'Loss of livelihoods related to physical and economic displacement due to the Awonsu and Apensu pit expansion projects and the Subika East waste dump expansion', it provides a sample of management response: 'Conducted independent study to identify households affected by projects Developed a resettlement action plan (RAP) and/ or livelihood action plan (LAP) to address the impacts of resettlement Formed committee led by community leaders to approve plans for resettlement, payment of adequate compensation and/or establishment of alternative livelihood support'. [2021 Sustainability Report, 2022: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1: See above. • Met: Describes how stakeholders involved in decisions about actions taken: The Human Rights Standard indicates: 'Our workforce and external stakeholders, inclusive of affected communities, shall be provided with ongoing opportunities to express their views on potential human rights risks, impacts, and mitigation

Indicator Code	Indicator name	Score (out of 2)	Explanation
			measures'. See above a specific example. [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com]
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes system for evaluation effectiveness of actions: The Human Rights Standard indicates, in relation to 'tracking and updating' 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. In line with Newmont's Social Baseline and Impact Management Standard (NEMSER-STA-017), assessment processes incorporating human rights will be updated and validated no less than every five years or when risks to human rights significantly change, whichever is more frequent. 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) modifications to systems and processes to improve performance. In line with Newmont's Interactions, Inspections and Audits Standard (NEM-IMSSTA-008), sites shall be audited against this standard to assess performance and ensure compliance with company requirements'. [Human Rights Standard 2020 update, 14/1/2020: s24.q4cdn.com] • Met: Example of lessons learned from evaluation effectiveness of actions: The document Respecting Human Rights: Our Approach notes: 'The right not to be subject to discrimination in employment or occupation is another salient human rights issue for us and our mitigations have been informed by input from stakeholders. Our poor representation of women at the operational level resulted in conversations between Newmont's Operations Leadership team and women to better understand their experiences. Based on feedback from these sessions, we identified symbols of exclusion to eliminate and developed regional and site strategies. Across the business, we also implemented recommendations from a 15-month trial of various talent acquisition interventions — such as blind resumes, more inclusive language in job posts, diverse hiring slates and diverse interview panels — to interrupt unconscious biases within the recruitment process and make a measurable difference'. Regarding the same issue, the 2022 Sustainability Report adds: 'We have made modest improvements in some areas, but challenges, such as a higher attrition rate for women compared to men, demonstrate the opportunities for improvement. We are focused on the following four priority areas to make meaningful progress over the coming years in cultivating an inclusive, diverse and engaged workforce: Making leaders accountable for their commitments [...]. Listening to and engaging with employees [...]. Driving accelerated improvement through disruptive tactics [...]. Focusing on the career progression of under-represented team members [...]'. [2022 Sustainability Report, 2023: s24.q4cdn.com] & [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions: See above. Regarding the right not to be subject to discrimination in employment or occupation, it adds 'With retention being one of our biggest barriers to achieving our objectives, we have begun to conduct "stay" interviews with diverse talent to understand the motivating factors for remaining at or leaving the Company. [...] To address retention issues, particularly with women in mid-career roles in Operations, we conducted "stay" interviews to understand what motivates them to stay or leave Newmont. The findings will be incorporated into the site action plans'. However, the subindicator looks for a description of how affected stakeholders are systematically involved in evaluation of whether the actions taken have been effective. No further evidence found. [2022 Sustainability Report, 2023: s24.q4cdn.com]
B.2.5	Communicating on human rights impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Provides two examples of comms with stakeholders: The 2021 Sustainability Report indicates: 'Newmont maintains ongoing engagement with key stakeholders on the status of human rights-related issues and legal cases. We disclose details on some of the more significant matters and controversies on our website, which is regularly updated'. As seen in previous indicators, controversies, grievances and engagement inform the due diligence process. The webpage was currently information on communication on nine different cases. [2021 Sustainability Report, 2022: s24.q4cdn.com] & [Sustainability - Responses, N/A: newmont.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes challenges to effective comms and how it is working to address them: Regarding resettlement and land use in Ghana, the 2022 Sustainability Report indicates: 'Our Ahafo North project experienced several land access-related challenges in 2022 associated with compensation entitlements and the valuation and removal of both legal and illegal structures. To resolve these matters, the government of Ghana established a committee comprising a Newmont representative, the Deputy Minister for Lands and Natural Resources, the Ahafo Regional Minister, the Executive Director of the Environmental Protection Agency (EPA) and the Chief Executive of the Tano North Municipal District. Field activities remained suspended while we continued work with the committee and engaged and negotiated with communities, youth and Traditional Authorities to agree on a path forward to commence construction'. However, this subindicator looks for a specific description of a challenge to effective communication with affected stakeholders it has identified and how it is working to address them. No further evidence found. [2022 Sustainability Report, 2023: s24.q4cdn.com]

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for 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: Grievance mechanism accessible to all workers: The 2021 Sustainability Report indicates: 'Newmont has three main channels for internal and external stakeholders to raise human rights concerns: Having an internal discussion with one of Newmont's human resources representatives; Filing a case online or over the phone via the Integrity Helpline, our confidential channel for personnel and external stakeholders to report potential Code of Conduct violations including human rights issues; and Formally registering a matter via complaints and grievances registers — a mechanism required at all sites to address stakeholder concerns in a timely and transparent manner'. [2021 Sustainability Report, 2022: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Grievance mechanism available in appropriate languages and workers made aware: The Integrity Helpline is available in multiple languages. The 2022 Sustainability Report indicates: 'Newmont requires all employees and directors to acknowledge understanding of and adherence to our Code upon joining the organization and on an annual basis'. The Code contains provisions on the Helpline. [2022 Sustainability Report, 2023: s24.q4cdn.com] & [Integrity Helpline_web, N/A: app.convercent.com] • Met: Describes how workers in EX BPs access grievance mechanism: The 2021 Sustainability Report indicates: 'Employees and non-employees — including suppliers and community members — can anonymously seek guidance and/or report a concern online or by phone using our third-party-run Integrity Helpline' [2021 Sustainability Report, 2022: s24.q4cdn.com] • Met: Expects EX BPs to convey expectation to their BPs: The Supplier Code of Conduct states: 'Suppliers should seek to address any complaints or grievances within their supply chain expeditiously (and within a maximum of 30 days)'. The document Respecting Human Rights: Our Approach indicates: 'Newmont's human rights training for suppliers outlines the requirements for suppliers to have their own culturally appropriate, responsive and accessible grievance mechanism or to direct complaints in their supply chain to Newmont's mechanism. We make it clear that they may be asked to provide evidence of the existence of a mechanism'. [Supplier Code of Conduct_web, N/A: newmont.com] & [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com]
C.2	Grievance mechanism(s) for external individuals and communities	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: Grievance mechanism accessible to all external individuals and communities: The 2021 Sustainability Report indicates: 'Employees and non-employees — including suppliers and community members — can anonymously seek guidance and/or report a concern online or by phone using our third-party-run Integrity Helpline' [2021 Sustainability Report, 2022: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Integrity Helpline is available in multiple languages. The document Respecting Human Rights: Our Approach indicates: 'We make sure our complaints and grievance mechanisms are accessible to local communities by providing clear guidance on how they can be accessed and promote them through

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>regular engagement sessions with communities’. It provides an example of a poster [from Suriname] with that fulfils this goal. Moreover, the Stakeholder Relationship Management Standard states: ‘Sites shall ensure that stakeholders are informed and trained on how to utilize the complaint and grievance mechanisms’.</p> <p>[Integrity Helpline_web, N/A: app.convercent.com] & [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com]</p> <ul style="list-style-type: none"> • Not Met: Describes how external individuals/communities access grievance mechanism: The document Respecting Human Rights: Our Approach indicates: ‘Complaints and grievances mechanisms — 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 [...]. We make sure our complaints and grievance mechanisms are accessible to local communities [...]’. However, it is not clear that external individuals and communities have access to it, in order to raise complaints or concerns about human rights issues at the Company’s business partners. [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com] • Not Met: Expects EX BPs to convey expectation to their BPs: The Supplier Code of Conduct states ‘Suppliers should seek to address any complaints or grievances within their supply chain expeditiously (and within a maximum of 30 days)’. The document Respecting Human Rights: Our Approach indicates: ‘Newmont’s human rights training for suppliers outlines the requirements for suppliers to have their own culturally appropriate, responsive and accessible grievance mechanism or to direct complaints in their supply chain to Newmont’s mechanism. We make it clear that they may be asked to provide evidence of the existence of a mechanism’. However, it is not clear the Company expects extractive business partners to convey expectations [to have a channel from which external individuals and communities can access to raise Complaints or concerns about human rights issues at the Company’s business partners] on access to grievance mechanism(s) to their business partners. [Supplier Code of Conduct_web, N/A: newmont.com] & [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com]
C.3	Users are involved in the design and performance of the mechanism(s)	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: Describes how users engaged on design and performance: The Stakeholder Relationship Management Standard indicates: ‘Sites shall develop multi-tiered mechanisms in consultation with stakeholders for the identification, tracking, escalation and resolution of local community complaints and/or grievances consistent with the UN Guiding Principles on Business and Human Rights’. The 2022 Sustainability Report adds: ‘Per our global standards, sites must consult with stakeholders to develop a mechanism for identifying, tracking, escalating and resolving local community complaints and/or grievances. [...] To increase the credibility of the mechanism and buy-in from community stakeholders, and ensure that we are listening to and responding to complaints in line with stakeholders’ expectations, we seek feedback from stakeholders who use the grievance mechanism. Key stakeholders are also informed when updates to the mechanism are made’. [Stakeholder Relationship Management Standard v.3, 14/01/2020: s24.q4cdn.com] & [2022 Sustainability Report, 2023: s24.q4cdn.com] • Not Met: Provides user engagement examples (at least two) on design and performance <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes how users engaged on improvement of mechanism: The 2021 Sustainability Report indicates: ‘Based on feedback from the Integrity Baseline Survey in late 2021, we began refreshing the portal to make it more interactive and user-friendly and better integrate our BI&C [Business Integrity and Compliance] information’. [2021 Sustainability Report, 2022: s24.q4cdn.com] • Not Met: Provides user engagement examples (at least two) on improvement: See above. The 2022 Sustainability Report adds: ‘In 2021, we developed a specific complaint-root-cause-analysis methodology to identify trends and the causes of complaints and how adjustments to company policies and procedures could help prevent future complaints. In 2022, we tested the methodology with each site and region by facilitating root cause workshops where site managers identified a specific category of complaints and participated in cross-functional root cause analysis. Identified root causes and associated actions were recorded and will be tracked to completion in 2023’. However, the example provided seems to make reference to a methodology to help preventing future complaints rather than to improve of the mechanism. The Company has provided additional comment which were already in use. [2022 Sustainability Report, 2023: s24.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	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: Describes procedure and timescales for managing complaints or concerns: The 2021 Sustainability Report indicates: ‘All sites achieve target to respond to, address, track, and if necessary, escalate 100 percent of tier 1 complaints within 30 days’. It adds: ‘In 2021, we addressed 99 percent (444 out of a total of 461) tier 1 complaints or grievances (C&Gs) recorded on site registers within 30 days’. The Company has provided additional comments to CHRB regarding this indicator, in which it discloses an example of a poster with information on its grievance mechanisms in Suriname. However, this subindicator looks for a description of timescales to manage complaints after these have been filed and how complainants are informed throughout the process. [2021 Sustainability Report, 2022: s24.q4cdn.com] • Met: Describes technical, financial, advisory support to enable equal access: The document Respecting Human Rights: Our Approach indicates: ‘Newmont’s three-tier complaints and grievance mechanism provides complainants with a communication pathway to the company, and ensures that stakeholders have access to other mechanisms via third-party facilitators or judicial means. Independent third parties are used to help both sides understand the pathway to resolution and we support these third parties through facilitating site visits (for example by reimbursing for fuel, providing accommodation or transport). [...] Where deemed necessary and appropriate, resources (financial or in the form of expertise, training, or technical/logistical support) shall be made available to external stakeholders to allow them to engage effectively’. [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism: Regarding its Integrity Helpline, the 2022 Sustainability Report indicates: ‘All substantiated matters lead to corrective actions, which may include a recommended process improvement, training, counseling, formal discipline, termination and/or legal action’. However, this subindicator looks for an explanation of the types of outcomes to the complainant through use of the grievance mechanism rather than the possible consequences to the part that breaches norms. [2022 Sustainability Report, 2023: s24.q4cdn.com] • Not Met: Describes escalation to senior levels / independent adjudicators: The 2022 Sustainability Report indicates: ‘Every quarter, BI&C produces a comprehensive report for our Executive Leadership Team and the Board of Directors’ Audit Committee. This report includes detailed statistics, trends and benchmarks of Newmont’s Integrity Helpline activity, matters involving abusive behaviors, key regulatory developments, and progress on the Company’s compliance and integrity initiatives’. The Company has provided additional comments to CHRB regarding this indicator, regarding its participation in independent remediation processes in Ghana and in Peru. However, this subindicator looks for a description of how complaints or concerns for workers and all external individuals and communities may be escalated to more senior levels or independent third party adjudicators or mediators to challenge the process or outcome at the complainant’s discretion. [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com] & [2022 Sustainability Report, 2023: s24.q4cdn.com]
C.5	Prohibition of retaliation for raising complaints or concerns	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: Public statement prohibiting retaliation against workers/stakeholders: The Standard of Conduct and Non-Discriminatory Treatment indicates: ‘Newmont provides multiple methods for Employees, contractors, vendors and third parties engaged on Newmont’s behalf to submit complaints concerning failure to uphold this Standard, the Code of Conduct, or any other Newmont policies, standards, or procedures [...] no individual will be retaliated against for reporting a Good Faith complaint’. [Standard of Conduct and Non-Discriminatory Treatment v.3, 2020: s24.q4cdn.com] • Met: Describes practical measures to prevent retaliation: The 2021 Sustainability Report indicates: ‘Employees and non-employees — including suppliers and community members — can anonymously seek guidance and/or report a concern online or by phone using our third-party-run Integrity Helpline’. [2021 Sustainability Report, 2022: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Specifies no legal action, firing or violence • Not Met: Expects EX BPs to prohibit retaliation against workers/stakeholders: The 2021 Modern Slavery Statement indicates: ‘We prohibit any form of retaliation

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>against anyone raising a human rights issue or concern and expect those we work with to do the same'. However, it is not clear this prohibition of retaliation also covers individual stakeholders and communities at business partners level, as it is not clear the mechanism is open to them. [2021 Modern Slavery Statement, 2022: s24.q4cdn.com]</p>
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	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: Complainants not asked to waive legal rights: The document Respecting Human Rights: Our Approach indicates: 'Using our complaints and grievance mechanism does not prevent complainants from accessing other remediation processes including state-based judicial or non-judicial mechanisms or other available mechanisms. We will collaborate with these mechanisms to ensure a fair resolution of issues'. [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com] • Met: Does not require confidentiality provisions: The document Respecting Human Rights: Our Approach indicates: 'While we may ask complainants to maintain confidentiality during an investigation to preserve the integrity of the investigation, there is no requirement that they accept confidentiality provisions'. [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Cooperates with state based non judicial mechanisms: According to the Stakeholder Relationship Management Standard, the Company requires sites to develop multi-tiered mechanisms for the management of grievance mechanisms. The third tier is for 'handling complaints that are not resolved and must be referred to official agencies or judicial processes'. The Company has provided additional comments to CHRB regarding this indicator, explaining different remediation processes it took part of. However, this subindicator looks for a description of the process by which it cooperates with state-based non-judicial grievance mechanism on complaints brought against it. No further evidence found. [Stakeholder Relationship Management Standard v.3, 14/01/2020: s24.q4cdn.com] • Met: Example of issue resolved (if applicable): The document Respecting Human Rights: Our Approach indicates: 'We have participated in independent remediation processes as early as 2005 when we made an explicit commitment in Ghana to work with the Commission on Human Rights and Administrative Justice (CHRAJ) to resolve disputes. Other work with CHRAJ included addressing perceptions of water contamination that resulted in the construction of boreholes for drinking water and perceived impacts on farm products which resulted in compensation'. The 2022 Sustainability Report adds: 'Our Ahafo North project experienced several land access-related challenges in 2022 associated with compensation entitlements and the valuation and removal of both legal and illegal structures. To resolve these matters, the government of Ghana established a committee comprising a Newmont representative, the Deputy Minister for Lands and Natural Resources, the Ahafo Regional Minister, the Executive Director of the Environmental Protection Agency (EPA) and the Chief Executive of the Tano North Municipal District. Field activities remained suspended while we continued work with the committee and engaged and negotiated with communities, youth and Traditional Authorities to agree on a path forward to commence construction. [...] In Peru, we have worked with the International Finance Corporation (IFC) Compliance Advisor Ombudsman (CAO) over many years in relation to complaints filed about environmental and health impacts related to the mine'. [Respecting Human Rights: Our Approach, 05/2022: s24.q4cdn.com]
C.7	Remedying adverse impacts	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: Describes approach taken to remedy adverse HRs impacts: The webpage section Stakeholder Claim, Events and Newmont Responses discloses different grievance cases. As for a union dispute in the USA, it explains: 'In March 2020, the National Labor Relations Board filed an administrative action and a lawsuit seeking an injunction stating that Nevada Gold Mines refused to recognize International Union of Operating Engineers Local 3 as the bargaining representative at mining facilities formerly owned and operated by Newmont in the Carlin trend of Nevada. In August 2020, NGM [Nevada Gold Mines JV], the National Labor Relations Board and the International Union of Operating Engineers Local 3, reached an agreement to settle the complaint, restore working conditions and benefits and reimburse union employees for lost wages. NGM agreed not to interfere with the ability of its workers to join a union and to work collaboratively with Union and non-union workforce members'. Also, the 2022 Sustainability Report notes: 'The project-affected people (PAPs), who were compensated for the loss of crops, structures and other assets related to the development of the Akyem [Ghana] mine and

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>mining operations, engaged Newmont to discuss the present and future welfare of the PAPs for enhanced livelihood support. [...] Following engagement with the Liaison Group for Mining in Forest Reserves (LGMFR), PAPs and members of the Newmont Akyem Affected Farmers Association on two programs, we revamped the Agriculture Improvement Programme (AIP) and the Alternative Livelihood Programme (ALP). The AIP and ALP are livelihood interventions designed to restore food security to households impacted by resettlement to pre-project levels and provide small business opportunities for farmers who wish to pursue other livelihoods'. [Union Dispute, USA, N/A: newmont.com] & [2022 Sustainability Report, 2023: s24.q4cdn.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes changes to systems, processes and practices to prevent future impacts: The 2022 Sustainability Report indicates: 'Based on findings from the fatality investigation, we updated our Fatality Risk Management Vehicles and Driving Standard and supporting critical control verifications to require the installation of open-hole steel barricade poles in front of open voids at all underground sites. These poles are an engineering control designed to significantly impede physically operated equipment from exposure to open voids as soon as the hazard is created, and they remain in place until a control of equal effectiveness is installed or the hazard no longer exists. The open-hole steel barricade poles provide far better protection than administrative controls such as chains and signage'. [2022 Sustainability Report, 2023: s24.q4cdn.com] • Not Met: Describes approach to monitoring/implementing agreed remedy: The 2022 Sustainability Report indicates: 'Every fatality risk standard includes the critical controls for managing the risk, requirements for field-based observations and verifications for critical controls to ensure the control is in place every time a task involving each risk is undertaken. Any non-conformances identified during the verifications must be addressed before work resumes'. However, this subindicator looks for evidence that the Company has an approach to monitor that it is implementing agreed remedies on a general basis. [2022 Sustainability Report, 2023: s24.q4cdn.com] • Not Met: Describes approach to learning from incidents if no adverse impacts identified
C.8	Communication on the effectiveness of grievance mechanism(s) 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: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The 2022 Sustainability Report discloses figures on its Integrity Helpline. It includes: 'Nature of matters (all matters) received through Newmont's Integrity Helpline in 2022'. The total number was 779. Among it, there is information on Concerns pertaining to environmental health and/or safety regulations. It also shows data on 'Number and outcomes of integrity cases opened, closed, substantiated and addressed', 'Tier 1 complaints by Site level' and 'Tier 1 complaints by category: Top 10 categories'. The latter group includes: Land – compensation, Land – Access and Land – acquisition/resettlement. However, no specific information on the number of grievances about human rights issues [beyond land, health and safety] filed, addressed or resolved and outcomes achieved for its own workers, for external individuals and communities. [2022 Sustainability Report, 2023: s24.q4cdn.com] • Not Met: Example of how lessons from mechanism improved HRs management system: The 2022 Sustainability Report indicates: 'The project-affected people (PAPs), who were compensated for the loss of crops, structures and other assets related to the development of the Akyem [Ghana] mine and mining operations, engaged Newmont to discuss the present and future welfare of the PAPs for enhanced livelihood support. In collaboration with the Traditional Authorities and the Birim North District Assembly, Newmont agreed to review the matter and provide support. We engaged an external consultant to undertake a socio-economic assessment of the PAPs, and the review recommended programs to address the livelihood challenges of the PAPs. Following engagement with the Liaison Group for Mining in Forest Reserves (LGMFR), PAPs and members of the Newmont Akyem Affected Farmers Association on two programs, we revamped the Agriculture Improvement Programme (AIP) and the Alternative Livelihood Programme (ALP). The AIP and ALP are livelihood interventions designed to restore food security to households impacted by resettlement to pre-project levels and provide small business opportunities for farmers who wish to pursue other livelihoods'. However, this seem to be a remedy to an impact that the Company may have caused. This subindicator looks for an example of how lessons from the grievance mechanism have contributed to improving the Company's human rights management system. [2022 Sustainability Report, 2023: s24.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes process to evaluate mechanism and changes made as a result: The Stakeholder Relationship Management Standard indicates: 'Sites shall review statistics and trends no less than every two years to gauge effectiveness of engagement, commitment, complaint and grievance management activities in collaboration with external stakeholders'. The 2021 Sustainability Report adds: 'Based on feedback from the Integrity Baseline Survey in late 2021, we began refreshing the portal to make it more interactive and user-friendly and better integrate our BI&C [Business Integrity and Compliance] information'. However, no example of changes made to improve the grievance mechanism based on the review found. [Stakeholder Relationship Management Standard v.3, 14/01/2020: s24.q4cdn.com] & [2021 Sustainability Report, 2022: s24.q4cdn.com] • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	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: Pays living wage or sets time-bound target: The 2021 Sustainability Report indicates: 'For many years, Newmont has conducted annual salary surveys in the countries where we operate and targeted a leading market position when setting pay for employees. This process gives us confidence that we pay employees above the living wage. We plan on expanding this process to use specific living-wage data to certify that we are paying our employees, contractors and suppliers a living wage in the countries where we operate. This includes compensation for a standard work week, excluding overtime, that provides a decent standard of living for a worker and his or her family'. [2021 Sustainability Report, 2022: s24.q4cdn.com] • Not Met: Describes how living wage determined: The 2022 Sustainability Report indicates: 'In 2022, we expanded this process, partnering with a third-party expert, BSR, to conduct a living wage analysis in all the countries where we have full-time employees. The analysis compared Newmont's compensation for the lowest-paid employees in each country/site against the proportionate amount the primary worker in a household needs to earn to maintain the entire household above a living wage. The analysis showed that in all countries where Newmont has full-time employees, our lowest-paid employee earns above the country's highest living wage value, demonstrating that Newmont is voluntarily setting the bar higher than required'. However, a living wage analysis is expected include involvement of relevant trade unions (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law), according to CHRB methodology. [2022 Sustainability Report, 2023: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Achieved paying living wage: See above. • Not Met: Reviews definition living wage 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 2021 Sustainability Report indicates: 'Newmont is an original signatory to the EITI'. [2021 Sustainability Report, 2022: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Reports taxes and revenue by country: In its 2022 Taxes and Royalties Contribution Report the Company discloses taxes and revenue information concerning the following countries: USA, Australia, Ghana, Suriname, Peru, Canada, Mexico, Argentina and Other. Regarding the item 'other', it expands: '[it] Includes our presence in Barbados, Chile, France, Guatemala, Haiti, Honduras, Indonesia, Luxembourg and the Netherlands. The Related party revenue includes interest income received in the Netherlands from Argentina. Only small amounts of tax are payable in the Netherlands on this income due to a combination of credits for withholding tax paid in Argentina on the interest income and deductions for interest expenses on loan funding from the USA. The interest income in the USA is subject to tax in that jurisdiction'. Only 'party revenue' appears under the category 'other', as there was no tax paid under this category. [2022 Taxes and Royalties Report, 2023: s24.q4cdn.com] & [Global Presence, N/A: newmont.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
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: Measures to prohibit violence/retaliation against workers for joining trade union: The 2021 Sustainability Report indicates: 'We are committed to fostering relationships based on trust with the unions that represent our employees, treating workers fairly, and providing them with safe and healthy working conditions. Every employee has the right to freedom of association and to engage in collective bargaining without interference or fear of retaliation. We have collective bargaining/enterprise agreements (covering wages, benefits and other employment terms) with unions in Australia, Canada, Ghana, Mexico, Peru and Suriname'. The 2022 Sustainability Report notes: 'In 2022, none of our operations experienced work stoppages lasting more than five days; however, at our Peñasquito operation in Mexico, the union representing employees issued a strike call related to the profit-sharing distribution and alleged breaches of the collective bargaining agreement. Following negotiations, we reached an agreement with the union whereby Newmont will pay the profit-sharing without a cap, and the union will preserve the employment of more than 100 unionized workers from local communities'. However, this subindicator looks for specific measures the Company puts in place to prohibit any form of intimidation, harassment, retaliation or violence against workers seeking to exercise the right to form and join a trade union of their choice (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law). No further evidence found. [2021 Sustainability Report, 2022: s24.q4cdn.com] & [2022 Sustainability Report, 2023: s24.q4cdn.com] • Met: Discloses % of total direct operations covered by CB agreements: The 2022 Sustainability Report indicates that the total percentage of workforce represented by union or workplace agreement in 2022 was 32.6%. 'At our operations in Argentina, Peru, Suriname, employees not covered by collective bargaining agreements, their working conditions and terms of employment are determined based on collective bargaining agreements that cover other employees. In Canada, Mexico and the U.S., employees not covered by collective bargaining agreements and non-union employee working conditions are based on local legal requirements, company policies, competitive market references and business needs'. [2022 Sustainability Report, 2023: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1
D.3.4	Health and safety: Fatalities, lost days, injury, occupational disease rates (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: Describes process to identify H&S risks and impacts: Regarding its safety risks, the 2021 Sustainability Report indicates: 'Our Fatality Risk Management program is the most important system across our company to keep people safe and out of harm's way. Under the program, we have identified the top 18 fatality risks common across our business, with activities involving vehicles and driving events among the highest of these risks. [...] Every fatality risk standard incorporates a risk analysis identifying the critical controls that must be in place every time we undertake a task involving each risk. The fatality risk standards and the critical control verification question sets are designed with global operational Managers and Supervisors in workshops occurring at least twice a year per risk. Internal risk-based site audits are conducted approximately every two years to verify that all fatality risk standards are consistently, properly and effectively implemented'. As for its health risks, it remarks: 'Based on our most recent risk analysis of our significant health or wellbeing risks, our near-term focus is on continued reductions in the risks associated with fatigue, embedding a wellbeing program throughout the organization, standardizing our hygiene program and managing the ongoing risks associated with the COVID-19 pandemic. At the operational level, our health risk management program identifies our top workplace health hazards — predominantly related to airborne agents such as silica dust, lead, mercury, welding fumes, manganese and diesel particulate matter — and measures our ability to reduce exposure to these hazards. Because it is not practical to assess each individual's risk, we identify groups of workers with similar exposures, referred to as similar exposure groups. Control management plans monitor the effectiveness of critical controls, and our exposure profile is reviewed regularly to measure our performance and prioritize our efforts'. [2021 Sustainability Report, 2022: s24.q4cdn.com] • Met: Discloses injury rate or lost days for last reporting period: The Total Recordable Injury Frequency Rate in 2021 was 0.41. [2021 Sustainability Report, 2022: s24.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Discloses fatalities for last reporting period: The number of fatalities was 0. [2021 Sustainability Report, 2022: s24.q4cdn.com] • Met: Discloses occupational disease rate for last reporting period: The Occupational Illness Frequency Rate in 2021 was 0.06. [2021 Sustainability Report, 2022: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance: The Company discloses its safety targets for 2021: Zero fatalities. However, no further information found on targets related to lost days (or near miss frequency rate) and occupational disease rates for the last reporting period. [2021 Sustainability Report, 2022: s24.q4cdn.com] • Met: Met targets or explains why not or actions to improve H&S management systems: It indicates: 'All top fatality risks are supported by global standards that set the minimum mandatory requirements for everyone working on Newmont's behalf'. Also, 'Our global Occupational Health and Hygiene standards aim to minimize health risks to employees, business partners, visitors and communities by employing the principles of anticipation, recognition, evaluation and control to manage occupational health hazards such as exposure to dust and fumes, chemicals, noise, ergonomics and communicable and non-communicable diseases. [...] In 2021, we began developing and/or updating our global standards to improve how we manage the material health and hygiene risks facing the business. The standards will formalize several controls already in place and drive a more standardized approach to managing key risks such as fitness for work, infectious diseases, thermal extremes and chronic exposure to hazardous substances. These standards will be reviewed with key stakeholders before we begin implementing them in 2022'. Moreover, it has achieved its zero fatality target. [2021 Sustainability Report, 2022: s24.q4cdn.com]
D.3.5	Indigenous peoples' rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	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: Process to identify/recognise indigenous rights holders: Regarding the identification of Indigenous Peoples, the Indigenous Peoples Standard indicates: '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, no description found of how the process it follows to identify and recognise affected or potentially affected Indigenous Peoples. The Social Baseline & Impact Assessment Standard adds: 'This Global Standard sets the minimum requirements for collecting information to determine social baseline conditions [...] and to provide an informed analysis for the development and implementation of successful short and long-term mitigation and development plans'. Regarding baseline studies it notes: 'Relevant socio-economic, anthropologic, geo-political and health baseline information will be collected in the exploration phase and updated at least every five years throughout the Site lifecycle'. The Company also provided additional feedback to CHRB regarding this indicator, referencing a Newmont Tanami Operations Social Impact Assessment. However, no description found of the process it follows to identify and recognise affected or potentially affected Indigenous Peoples. [Indigenous Peoples Standard v.3, 14/01/2020: s24.q4cdn.com] & [Social Baseline & Impact Assessment Standard, 2020: s24.q4cdn.com] • Met: Describes how indigenous communities are engaged during 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 v.3, 14/01/2020: s24.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Met: Commitment to FPIC: The 2021 Sustainability Report indicates: ‘As a member of the International Council on Mining and Metals, we commit to its position statement to work toward obtaining free, prior and informed consent (FPIC) of Indigenous peoples’. The Stakeholder Relationship Management Standard adds: ‘Engagement with Indigenous People shall adhere to the Free Prior Informed Consent (FPIC) requirements outlined within the ICMM Statement on Indigenous Peoples (May 2013)’. The Indigenous People's Standard notes: ‘Newmont will work to obtain the Consent of Indigenous Peoples for new projects and changes to existing projects by focusing the process on reaching agreement on the basis for which the project should proceed’. [2021 Sustainability Report, 2022: s24.q4cdn.com] & [Indigenous Peoples Standard v.3, 14/01/2020: s24.q4cdn.com] • Not Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources: The 2022 Sustainability Report discloses Operating sites on or near Indigenous peoples’ territories and if they have formal agreements in place. The Company has provided an additional source to CHRB regarding this indicator in which it discloses information on a 2017 FPIC in Suriname. However, this subindicator look for most recent example where it has obtained free prior and informed consent (FPIC) or where it decided not to pursue the land or resources impacting on indigenous peoples, and it is not clear whether there are more recent cases. [2022 Sustainability Report, 2023: s24.q4cdn.com] & [Lessons from a Suriname case study, 4/2017: colorado.edu]
D.3.6	Land rights: Land acquisition (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: Describes approach to indentifying lang tenure rights holders and negotiating compensation: The Land Acquisition & Involuntary Resettlement Standard establishes that: ‘Landowners and/or users with physical or economic interests in the land (including livelihood, legal and/or traditional) shall be identified prior to acquiring land or executing involuntary resettlement including an assessment of vulnerable groups. Socio-economic baseline data shall be gathered in sufficient detail and quality to document stakeholders who will be displaced by the site, determine who will be eligible for compensation and/or assistance, and discourage ineligible persons, such as opportunistic settlers, from claiming benefits. [...] A resettlement and/or livelihood restoration entitlement framework shall be established and agreed upon with the affected community/persons or their representatives’. [Land Acquisition & Involuntary Resettlement Standard v.3, 2020: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes approach to compensation including valuation: As for compensations, it notes: ‘Compensation negotiation processes and rates shall be, at a minimum, consistent with local laws and regulations and respectful of customary title and use of the land and related assets to ensure full and informed participation of affected persons. A comprehensive baseline and impact assessment shall be completed for affected persons and households [...] to document assets for which compensation will be provided as indicated by the “cut-off date.” A fair market value basis shall be established for compensation levels for land uses and improvements (crops, non-occupied structures, culturally significant sites) as set by government processes or negotiated directly with the owner/community. Loss of assets or access to assets shall be promptly compensated for at full replacement cost. [...] Transitional support shall be provided, as necessary, based on a reasonable estimate of the time required to restore their income earning capacity, production levels and standards of living. [...] Compensation standards shall be transparent and applied consistently to communities and persons affected by the displacement. When livelihoods of displaced persons are land-based or where land is collectively owned, Newmont, when feasible and desired by affected persons, will offer land-based compensation alternatives. [...] Physically displaced households shall be offered choices among feasible resettlement options, including replacement housing or cash compensation where suitable alternative physical residence can be verified prior to relocation’. [Land Acquisition & Involuntary Resettlement Standard v.3, 2020: s24.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Met: Describes steps to meet IFC PS 5 in state deals: The 2022 Sustainability Report indicates: 'All land acquisitions are conducted in compliance with applicable laws, regulations and international best practices as defined by International Finance Corporation (IFC) Performance Standard 5. We aim to avoid resettlement whenever possible; however, when resettlement is required, we ensure that affected people and communities are able to make informed decisions, adverse impacts are minimized, and livelihoods and living conditions are restored or improved. Before any resettlement activities begin, we work with local stakeholders and external experts to develop a resettlement action plan (RAP) and/or a livelihood action plan (LAP) that identifies physical displacement and economic impacts. The relevant sites are responsible for implementing and closely monitoring RAPs and LAPs. This includes conducting annual audits by external experts to ensure activities fulfill commitments and meet the needs of those who are affected'. [2022 Sustainability Report, 2023: s24.q4cdn.com]
D.3.7	Security (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: Describes security implementation (incl. VPs or ICOC) and provides an example: The Company publishes a 2021 Annual Report on the Voluntary Principles on Security and Human Rights where it discloses how it implemented its security approach during the year in Suriname. It includes engagement with governments, public security and civil society, training and progress review. Regarding Yanacocha, the 2021 Sustainability Report adds: 'Due to an increase in the number of land invasions, attacks on pipelines containing gold, and community tensions over water rights and employment, our security function created a joint task assignment and coordination process with key internal stakeholders to proactively monitor any community issues and work to resolve them before they escalate into security problems. This process is now embedded in all of our high-risk sites. We also deployed technologies with remote pipeline monitoring capabilities'. [2021 Sustainability Report, 2022: s24.q4cdn.com] & [2021 Annual Report VPSHR, 2021: s24.q4cdn.com] Met: Ensures Business Partners/JVs follow security approach: The 2021 Modern Slavery Statement indicates: 'Through contract terms, MOUs, standard operating procedures and supplier trainings, we make our suppliers and business partners aware of our human rights commitments including commitments to the Voluntary Principles on Security and Human Rights [...]. We reinforce these commitments with governments, joint venture partners, (even where we are not the operator) and minority interests'. [2021 Modern Slavery Statement, 2022: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> Met: Security and HRs assessment includes input from local communities: The 2022 Annual Plenary Report, which reports on the Voluntary Principles on Security and Human Rights, indicates: 'Peñasquito conducted a Social Impact Assessment (SIA) with an integrated Human Rights Impact Assessment (HRIA). As part of our Social Baseline and Impact Assessment Standard, each operating site is required to update its SIA at least every five years, and the SIA must include human rights considerations. The Peñasquito integrated SIA/HRIA identified the Right to Life as a priority salient human rights issue and included the local security context as part of the assessment. Community safety and security was also identified as a potential area of impact, and the mitigation action plan included reference to continued VPs implementation, including risk assessments, training, engagement with host government security and ensuring community access to an open and safe grievance mechanism'. The Social Baseline and Impact Assessment Standard requires that: 'External stakeholders, inclusive of affected communities, shall be consulted throughout the baseline and assessment process and given the opportunity to validate collected data. Participation shall be designed to ensure that the process is inclusive, accessible, free of external manipulation, and undertaken in a timely and culturally appropriate manner'. [2022 Annual Plenary Report, 2023: s24.q4cdn.com] Met: Two examples of working with local communities to improve security: See above, the example of Yanacocha. Moreover, the 2022 Annual Plenary Report indicates: 'At a local level, mine community relations and security staff meet with traditional and local authorities, youth and women to discuss and respond to security concerns. For example, Ahafo South requested the removal of police checkpoints after several complaints surfaced'. [2021 Sustainability Report, 2022: s24.q4cdn.com] & [2022 Annual Plenary Report, 2023: s24.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.8	Water and sanitation (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: Describes preventative/corrective action plans for water and sanitation risks: The 2021 Sustainability Report indicates: ‘Our Global Water Strategy guides our efforts to use water more efficiently at our operations and to support collective actions that improve water quality and quantity. [...] The strategy’s framework aligns with the International Council on Mining and Metals’ Water Stewardship Position Statement [...]. It also supports other internal strategies such as those related to respecting human rights [...]. Newmont’s Guide to Water provides an overview of the strategy, highlighting: The strategy’s objectives, strategic programs and desired outcomes; The spectrum of our identified water-related risks within the watersheds in which our operations reside and how we manage them; An overview of the water maturity model and path toward water stewardship; and Ongoing work that supports collective management and action through site-, regional- and corporate-level partnerships’. The 2022 CDP Water Risk Response adds: ‘Action plans are developed to work towards improvements in three pillars: Water Management – Improved efficiency with an internal focus on reducing, reusing and recycling water in our operations. Watershed Management – Integration of water risks and impacts within the broader watershed when evaluating business risks and setting operational water targets. Water Stewardship – Collaborating with stakeholders on shared challenges, capacity building and governance in the watershed’. [2021 Sustainability Report, 2022: s24.q4cdn.com] & [2022 CDP Water Risk Response, 2022: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Sets targets on water stewardship that consider water use by local communities: The 2022 Sustainability Report describes the Water stewardship target: ‘All sites achieve annual site plan to participate in multi-stakeholder watershed governance bodies to support collective action/management of water, improved water quality and quantity’. It adds: ‘In addition to our water efficiency targets, we have a public water stewardship target. This objective requires sites to complete action plans that include participating in multi-stakeholder watershed governance bodies — including our site-based community participatory monitoring programs — aimed at supporting collective water management activities that improve water quality and quantity’. [2022 Sustainability Report, 2023: s24.q4cdn.com] • Met: Reports progress in meeting targets and trends demonstrating progress: Regarding its water stewardship targets, the 2022 Sustainability Report indicates: ‘For 2022, eight out of 12 sites met or mostly met the target, completing 82 of 123 (67 percent) of the action plans. COVID-19 restrictions impacted the completion of stakeholder engagement actions and caused issues related to our supply chain, contractor availability and the ability for personnel to access sites, which resulted in project implementation delays’. It also discloses data on different water indicators, including water withdrawn, Other managed water, Water reused or recycled, Water discharged, Water consumption. [2022 Sustainability Report, 2023: s24.q4cdn.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.9	Women's rights (in own extractive operations, which include JVs)	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: Describes processes to stop harassment and violence against women: The 2022 Sustainability Report notes: 'Along with working closely with the Chamber of Minerals and Energy of Western Australia and the Minerals Council of Australia to support industry-wide responses to the inquiry, Newmont applied the findings to establish a multi-year program to create a safe, equitable and healthy workplace. This program builds on our work to address conscious and unconscious bias, discrimination and harassment and emphasizes how every individual is responsible for delivering a physically and psychologically safe and inclusive workplace. In July 2022, Newmont President and CEO Tom Palmer appointed Alex Bates as Senior Vice President of Workplace Responsibility to lead the Company's effort to develop and maintain the workplace environment necessary for all employees to feel seen, heard and respected. For 2022, the program focused on the discovery phase — listening to the experiences of employees and contractors from across our Company to develop a deeper understanding of our current culture. [...] More than 700 people participated in focus groups and individual conversations at our sites and office hubs in Australia, Ghana, and North and South America. Toward the end of 2022, we presented the emerging themes from these conversations to both Newmont's Executive Leadership Team and the Board of Directors. The good news is that most people believe Newmont is a good place to work, and that we have a strong culture of care and respect. However, more sobering themes that have emerged include: Sexual harassment, discrimination, bullying and racism exist at Newmont. In certain cases, there is a lack of trust in and understanding of our reporting, investigation and feedback systems. The physical conditions at site require improvement. Leaders require more support to manage and guide a safe, healthy and equitable workplace. To address these findings, we have begun to design activities to prevent and respond to these behaviors'. [2022 Sustainability Report, 2023: s24.q4cdn.com] • Not Met: Working conditions take into account gender issues: The 2021 Sustainability Report indicates: 'Across our global operations, we identified more than 400 symbols of exclusion and have already eliminated 20 percent, including "Men at Work" signs, segregated parking (e.g., between employees and contractors), seat preferences on fly-in-fly-out flights based on position, and ill-fitting personal protective equipment for pregnant women'. However, although the Company provides an example of how it has fitted equipment for pregnant women, it is not clear how it takes into account differential impacts on women and men of working conditions in general, including to reproductive health. [2021 Sustainability Report, 2022: s24.q4cdn.com] • Not Met: Measures and steps to address gender pay gap at all levels of employment: The 2021 Sustainability Report indicates: 'Because women only represent 9 percent of our Operations workforce (up from 8 percent at the end of 2020), members of our Operations Leadership Team (OPLT) held one-on-one conversations with women throughout Operations to better understand their experiences working at site. Based on feedback from these sessions, we identified additional symbols of exclusion to eliminate and developed regional and site strategies. The OPLT established a goal to improve female representation within Operations by 1 percent year over year, while also improving our focus on retention'. The 2022 Annual Sustainability Report discloses data on ratio of average female salary to average male salary according to employee category and ratio of average female salary to average male salary by country. However, no evidence found in relation to steps it takes to address it throughout all levels of employment. [2021 Sustainability Report, 2022: s24.q4cdn.com] & [2022 Sustainability Report, 2023: s24.q4cdn.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap: The 2022 Annual Sustainability Report discloses data on ratio of average female salary to average male salary according to employee category and ratio of average female salary to average male salary by country. However, this subindicator looks for an analysis of trends (year on year data) demonstrating progress on closing any gender pay gap. [2022 Sustainability Report, 2023: s24.q4cdn.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"> • Area: Right to security of persons • Headline: Newmont sued by a Peruvian farmer for physical and psychological abuse. • 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>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 Defence 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> <p>On 15 June 2020, EarthRights International (a human rights NGO) filed an appeal to the U.S. Court of Appeals for the Third Circuit in Maxima Acuña Atalaya and her family's case against Newmont Mining Corporation. The appeal is intended to reverse a decision made in March 2020 by the U.S. District Court for the District of Delaware that the case should be heard in Peru rather than in the United States.</p> <p>On 11 December 2020, the U.S. Court of Appeals for the Third Circuit upheld a lower court decision that Maxima Acuña Atalaya and her family's case against Newmont Mining Corporation should be heard in Peru rather than in the United States.</p> <p>On 9 July 2021, Maxima Acuña Atalaya and her family filed a petition for certiorari (a court process to seek judicial review of a decision of a lower court) with the U.S. Supreme Court in their case against Newmont Mining Corporation. The family is requesting that the high court review a flawed procedural legal doctrine that frequently blocks cases based on the notion that it is more "convenient" for a U.S. corporation to litigate in a foreign court rather than in its home state. [RESOLVE Report of the Independent Fact finding Mission, 28/09/2016, "Tragadero Grande: Land, human rights, and international standards in the conflict between the Chaupe family and Minera Yanacocha": resolve.ngo] [Earth Rights International, 15/09/2017, "Acuna v. Newmont Complaint": earthrights.org] [Earth Rights International, 09/07/2021, "PERUVIAN ENVIRONMENTAL DEFENDERS TAKE THEIR FIGHT TO THE U.S. SUPREME COURT.": earthrights.org] [Newmont, 14/07/2021, "Chaupe Land Dispute Information Update: July 14, 2021": s24.q4cdn.com]</p>
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: Score 1</p> <ul style="list-style-type: none"> • Met: Public response: The company provided a response to the allegation on the appropriate Newmont Responses page on its website. <p>Minera Yanacocha (Newmont Mining Corporation is the majority shareholder) response on the allegations of human rights violations was to state that the case is not a human rights matter, but rather, a land dispute and therefore a legal matter.</p> <p>In its "Chaupe Land Dispute Information Update: July 14, 2021", Newmont stated that the alleged "conduct did not occur and we therefore denied the claims in the lawsuit" [RESOLVE Report of the Independent Fact finding Mission, 28/09/2016: resolve.ngo] [Newmont, 14/07/2021, "Chaupe Land Dispute Information Update: July 14, 2021": s24.q4cdn.com]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> Met: Detailed response: The company's response of 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. [Newmont, 14/07/2021: s24.q4cdn.com]
E(1).2	The company has investigated and 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: Engaged with stakeholders: According to Newmont, the company established early dialogue process but was stalled when an NGO representing the Chaupe family got involved. In May 2015, Newmont commissioned the NGO, RESOLVE, "to establish an independent body to objectively examine the facts underpinning the dispute, our actions and behaviours and publicly disclose their findings. The 18-month process included an extensive document review and interviews with and input from the Chaupe family, their supporters, Peruvian authorities and Newmont employees. The report and all of our statements about the situation have been public since 2015". [Chaupe land dispute, Peru, N/A: newmont.com] Met: Identified cause: In May 2015, Newmont commissioned the NGO, RESOLVE, to conduct an independent fact finding mission on the case and its underlying causes. Results of the investigation are publicly available and while it is an extensive investigation into what Newmont believes to be the cause of the issue, the Chaupe family filed a lawsuit against the company in 2017. [Report of the Independent Fact Finding Mission, 28 Septmber 2016: resolve.ngo] <p>Score 2</p> <ul style="list-style-type: none"> Met: Identified and implemented improvements: In its "Chaupe Land Dispute Information Update: July 14, 2021", the company declares: "Newmont has been actively strengthening its human rights due diligence efforts since the publication of the Yanacocha Independent Fact Finding Mission report in 2016 including: Assessing impacts: we implemented explicit requirements to conduct human rights impact assessments for all sites (standalone or integrated). This requirement includes considering our sites' own activities and the activities of our business partners. It also includes a requirement to consider vulnerability of those individuals impacted by our business activities. Integrating human rights into processes: we developed an integrated management system which monitors and actions potential human rights incidents through effective engagement with stakeholders, risk assessments, complaints and grievances mechanisms and escalation requirements. Training: we established specific human rights training platforms for employees and suppliers and improved training on the Voluntary Principles on Security and Human Rights. Business relationship human rights risks: we established a comprehensive supplier risk management program which identifies risks with suppliers and with the scope of work that suppliers will be carrying out. Training and human rights audits are conducted with suppliers who have a higher risk to impact human rights. Providing transparency around claims, events and our responses to them, is an important part of building trust with our stakeholders. In this regard, we have a Newmont Responses page on our website where updates such as this one are posted. [Newmont, 14/07/2021: s24.q4cdn.com] Not Met: Stakeholder input to steps taken: The Company provided feedback for this indicator, however, it was not material for the assessment, as it did not sufficiently prove input provided by the affected stakeholders was taken into account.
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: Provided remedy: There is no evidence suggesting the company provided remedy to the affected stakeholders. While Minera Yanacocha has an operational-level grievance mechanism in place, the company failed to self-employ this mechanism to systematically record allegations of human rights violations, which, according to the procedural requirements of the mechanism, would have triggered an early, internal investigation. <p>The Company provided feedback for this indicator, however, it was not material for the assessment. [RESOLVE Report of the Independent Fact finding Mission, 28/09/2016: resolve.ngo]</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not Met: Evidence for lack of Impact or link: The company denies the allegation. However, this is not sufficient evidence to prove the affected stakeholder did not suffer the alleged impacts. <p>The Company provided feedback to the indicator, stating that the cases before the US courts have been dismissed. However, the cases were dismissed on basis of jurisdiction not merit. Therefore, this is not considered sufficient evidence of lack of impact or link under the CHRB methodology. [Earth Rights International, 09/07/2021: earthrights.org] [2022 Sustainability Report, 2023: s24.q4cdn.com] Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> • Area: Right to a safe, clean, healthy and sustainable environment • Headline: Local communities protest against environmental impact of Pueblo Viejo gold mine in Dominican Republic • 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 sulphide 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> <p>On 4 May 2021, civil society groups urged Newmont Corp to halt USD 1.3 billion expansion of its Pueblo Viejo gold mine in the Dominican Republic, citing risks posed by increased mine waste and threats to local communities' rights. Pueblo Viejo is operated by a joint venture in which Barrick holds 60% and Newmont Corp holds the remainder.</p> <p>Around 87 environmental and aid groups signed a letter opposing the expansion and construction of a facility for storing mine waste, known as a tailings dam. Police and military on April 27 restricted more than 200 people from taking part in the community meeting held for the expansion work.</p> <p>On 19 September 2021, NGOs and citizens held another protest in Dominican Republic against Barrick Gold and Newmont's Pueblo Viejo mine's tailings expansion". [Axis of Logic, 05/12/2017, "Fighting for Their Water and Their Lives, Communities Take Direct Action Against Barrick Gold in the Dominican Republic": axisoflogic.com] [El Caribe, 06/11/2017, "Campesinos se encadenan en zona minera de Cotuí": elcaribe.com.do] [Mining Watch, 04/10/2021, "International NGOs Stand with Dominicans Opposed to Pueblo Viejo Mine Expansion": miningwatch.ca] [Reuters, 04/05/2021, "Civil society groups urge halt to Barrick's Pueblo Viejo expansion": reuters.com]</p>
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: Score 1</p> <ul style="list-style-type: none"> • Not Met: Public response: A response by the company is not publicly available. The company provided feedback for this indicator. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response
E(2).2	The company has investigated and taken	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Not Met: Engaged with stakeholders: There is no evidence suggesting the company engaged with the affected stakeholders. The company provided

Indicator Code	Indicator name	Score (out of 2)	Explanation
	appropriate action		<p>feedback for this indicator. However, it was not material to the assessment as it did not indicate actions taken by the company itself.</p> <ul style="list-style-type: none"> • Not Met: Identified cause: The company does not present investigative results on the underlying causes of the events concerned. The company provided feedback for this indicator. However, it was not material to the assessment as it did not indicate actions taken by the company itself. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: There is no evidence the company implemented improvements in its policies/processes and/or made changes to its management systems following the events and their human rights impacts. The company provided feedback for this indicator. However, it was not material to the assessment as it did not indicate actions taken by the company itself. • Not Met: Stakeholder input to steps taken: The company provided feedback for this indicator. However, it was not material to the assessment as it did not indicate actions taken by the company itself.
E(2).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	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: Provided remedy: There is no evidence suggesting the company provided remedy to the affected stakeholders. • Not Met: Evidence for lack of Impact or link: The company provided feedback for this indicator. However, it was not material to the assessment as it did not indicate actions taken by the company itself. <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> • Area: Right to a safe, clean, healthy and sustainable environment • Headline: Ongoing negative health impacts on Choropampa community 20 years after mercury spill • Story: On April 2nd, 2020, The Guardian, a British news paper, alleged in its article that villagers in Peru's northern Cajamarca region are suffering negative health impacts from mercury spill fallout, after 20 years. <p>On June 2nd, 2000, a canister of mercury overturned on a truck travelling to Lima from the Yanacocha gold mine in Cajamarca. More than 150 kg of mercury – a by-product of gold extraction – dribbled along the dirt road that passes through Choropampa and two other villages. Residents, including pregnant women and children, scooped up the liquid and took it home. An investigation into the spill by the World Bank's International Finance Corporation (IFC) found that the canisters were not secured properly on to the truck and one had tipped over.</p> <p>At the time of the spill, the IFC had a 5% stake in Minera Yanacocha, which is owned and run by Newmont Corporation, Buenaventura Mining Company and Sumitomo Metal Mining Co Ltd. The IFC sold its stake in 2017.</p> <p>Minera Yanacocha and the transportation company Ransa also agreed to pay villagers compensation in return for their silence, according to Defensoría del Pueblo. The contracts stated that the companies were not responsible for the spill and no legal action would be taken against them.</p> <p>In total, 755 of the 3,000 inhabitants of the three villages affected by the spill were taken to hospital. In the two decades since the spill, health conditions have emerged that are not covered under the insurance scheme, leaving villagers unable to pay for treatment.</p> <p>More than five people have died from illnesses that locals believe are the result of the spill.</p> <p>Legal action against the mine is an option only for the 80 families who did not sign the contracts. There are 36 legal cases still pending against Minera Yanacocha. [Business & Human Rights Resource Centre, 03/04/2020, "Peru: 20 years after the mercury spill at mine owned by Newmont, Buenaventura Mining Company and Sumitomo, villagers experience negative health impacts": business-humanrights.org] [The Guardian, 02/04/2020, "The village still suffering from Peru mercury spill fallout – after 20 years": theguardian.com] [EJOLT, 05/08/2015, "The</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Yanacocha Mine Case": ejolt.org [MAC - Mines and Communities, 05/03/2015, "Peasants in Peru near showdown on mercury spill": minesandcommunities.org]
E(3).1	The Company has responded publicly to the allegation	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: Public response: After the incident, Newmont provided a number of responses to fact checking questions of New York Times and PBS FRONTLINE/World and apparently made statements on its website (as of today no longer available). Newmont officials blamed unsafe practices by a Peruvian trucking contractor for the spill of mercury near Choropampa. In response to the claims of continuing health impacts, a spokesperson for the company stated that 'There are 36 legal cases [in Peru] still pending against Minera Yanacocha [...] The medical care that this insurance has offered in recent times has no relation to possible effects or consequences related to the 2000 accident in Choropampa. We have treated common diseases such as the flu, diarrhoea, pregnancies, among others.' [MAC - Mines and Communities, 05/03/2015: minesandcommunities.org] [The Guardian, 02/04/2020: theguardian.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The statements by the company do not address the allegation in detail. Media sources cite responses by the Yanacocha mine, however, as the company does not publicly point to these statements, they cannot be considered for the assessment of this indicator. [The Guardian, 02/04/2020: theguardian.com]
E(3).2	The company has investigated and taken appropriate action	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: Engaged with stakeholders: The IFC's Compliance Advisor Ombudsman action led to the constitution of a forum for dialogue between the community and the mine. A roundtable (Mesa de Diálogo y Consenso) was formed, which was involved above all in monitoring water quality in the four basins affected by the Yanacocha mine activity, but there was no significant result regarding the Choropampa mercury spill. <p>A media source cites 'Yanacocha said it had worked with the Peruvian authorities to address the impact of the spill.' However, it is not clear if the authorities were mandated by the affected stakeholders to speak on their behalf on this issue. [EJOLT, 05/08/2015: ejolt.org] [The Guardian, 02/04/2020: theguardian.com]</p> <ul style="list-style-type: none"> • Not Met: Identified cause: After the spill, the IFC's Compliance Advisor Ombudsman oversaw an independent investigation, which found that there were significant discrepancies in the company's waste management and emergency procedures. The investigation found that the canisters were not secured properly on to the truck and one had tipped over. However, there is no evidence that Newmont or the Yanacocha mine contributed in this investigation or conducted another one independently. The company does not present what it considers to be the underlying causes that led to the alleged events. [EJOLT, 05/08/2015: ejolt.org] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Identified and implemented improvements: The mining company sent in a cleanup crew and offered villagers cash if they returned any mercury they had collected. Yanacocha said it had worked with the Peruvian authorities to address the impact of the spill. It said an environmental risk assessment carried out two years afterwards "show and confirm that once remediation efforts were performed in the affected areas, there was no contamination danger for the inhabitants or the environment in the areas where the accident took place". It added: "The company is aware that people's health and environment protection is of utmost importance. This is why Yanacocha spared no effort or resource to solve the problems caused by the accident and to prevent something similar from happening in the future." The company said it allocated more than \$15m (£12m) in monitoring programmes, medical care, mercury recovery, environmental remediation, and home cleanup, as well as in its individual and community compensation programme. In addition, the company funded various activities for the benefit of the local communities, such as the improvement of schools, water works and medical facilities. [The Guardian, 02/04/2020: theguardian.com] • Not Met: Stakeholder input to steps taken
E(3).3	The company has engaged with affected stakeholders to provide for or	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: Provided remedy: Most of the Peruvian citizens affected by the incident entered

Indicator Code	Indicator name	Score (out of 2)	Explanation
	cooperate in remedy(ies)		<p>into settlement agreements with Yanacocha, receiving little compensation. Yanacocha also agreed to provide people with health insurance for illnesses related to the mercury spill. The majority of villagers signed.</p> <p>Approximately 1,100 Peruvian citizens filed lawsuits before the Denver District Court for the State of Colorado. These actions aimed to obtain compensation for the damages caused by the mercury spill. In October 2007, the parties entered a court-approved settlement agreement, and most of the cases were resolved. [The Guardian, 02/04/2020: theguardian.com] [EJOLT, 05/08/2015: ejolt.org]</p> <ul style="list-style-type: none"> • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Remedy satisfactory to stakeholders: After the Choropampa incident, the company reached agreements with the people affected by the incident for small economic compensations so that they could avoid further legal action before the courts. The settlement agreements stated that the companies were not responsible for the spill and no legal action would be taken against them. Soon, the affected stakeholders felt that the compensation was not in proportion to the damage caused. <p>With regard to the health insurance provided by Yanacocha, in the two decades since the spill, health conditions have emerged that are not covered under the insurance scheme, leaving villagers unable to pay for treatment. In a report in 2008, the Peruvian ministry of health said medical assistance for the villagers was “insufficient and must be improved”.</p> <p>Therefor, CHRB concludes the remedy is not considered satisfactory by the stakeholders. [The Guardian, 02/04/2020: theguardian.com] [EJOLT, 05/08/2015: ejolt.org]</p> <ul style="list-style-type: none"> • Met: Remedy delivered: There is no evidence that the remedy was not delivered to the affected stakeholders. • Not Met: Independent remedy process used: The company resorted to individual settlement agreements with stakeholders to avoid court proceedings. Moreover, the company allegedly induced the stakeholders to sign by leveraging their lack of knowledge of their legal prerogatives, settling very low compensations and binding the stakeholders to the agreements. According to Defensoría del Pueblo, Minera Yanacocha and Ransa agreed to pay villagers compensation in return for their silence. Therefore, this remedial process is not considered independent by CHRB. [The Guardian, 02/04/2020: theguardian.com]
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> • Area: Land Rights; Right to safe, clean, healthy and sustainable environment; Right to security of persons • Headline: Several allegations regrading the Peñasquito mine in Mexico • Story: On April 30th, 2019, Newmont Goldcorp said it had suspended payments and social programs to workers, suppliers, and villages around its Mexico’s largest gold mine in response to a blockade by a contractor and members of one of the 25 communities. The day before, the company suspended operations at the Penasquito mine because of the month-long blockade. Among the programs affected are elementary and high school grants, productive projects, trusts and social investments, the company said. According to Newmont Goldcorp, a local trucking company and a group of people from San Juan de Cedros, one of the villages near the mine, demanded the company pay USD 442 million for the “presumed effects on a body of water in the said community.” <p>On June 1st, 2018, around 20-30 local truck-drivers started blocking the entry to Goldcorp's Peñasquito mine, claiming that the company reneged on promises to hire locally.</p> <p>On October 2017, local residents also blocked access at the mine for more than one week, protesting over a water dispute.</p> <p>On September 28th, 2016, landowners, truck drivers, and residents of the Mexican community of Mazapil who have been protesting since 26/09/2016, have decided to block the access to Goldcorp’s Peñasquito mine. They were demanding jobs, compensation for environmental damages, and clean water for their communities.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>On October 9th, Newmont Goldcorp announced the lifting of an almost four-week illegal blockade affecting its Peñasquito gold-silver mine in Mexico. It added operations remained temporarily halted at the mine. The protesters included truck drivers, landowners and residents. They demanded compensation from Newmont Goldcorp for alleged environmental damages caused by the mine. They are also requesting access to clean water for local communities.</p> <p>On September 14th, 2019, employees of the trucking contractor leading the protest action together with some members of the Cedros community started again obstructing access to the mine. According to local press sources, around 40 workers from the CAVA trucking company decided to rally again to pressure Peñasquito into hiring them. They also claimed that the mine had not recognized that its extractive activities were drying out the Cedros' water well and damaging the environment.</p> <p>On 6 June 2021, the Business & Human Rights Resource Centre reported that the body of the transport leader and social activist José Ascensión Carrillo Vázquez was identified, with clear signs of torture and the coup de grâce, along with eight other people on the Vanegas-San Tiburcio highway in Mazapil, Zacatecas, in response to which the clarification of the facts was requested.</p> <p>José Ascensión Carrillo Vázquez was a social activist and leader of the CAVA Transporters' Union, he was also a defender of the land and territory against the operations of the Peñasquito mining company, a subsidiary of Newmont, which has been allegedly devastating the water, the territory and the environment.</p> <p>The Frente Popular de Lucha de Zacatecas (FPLZ), the Coordinadora Nacional Plan de Ayala (CNPA), the Organización de Derechos Humanos Red Solidaria Década Contra la Impunidad A.C. (RSDCIAC), and the Red Solidaria Década Contra la Impunidad A.C. (RSDCIAC), all called for a clarification of the facts. (RSDCIAC), and the Frente de Comunidades Afectadas por la Minería (Front of Communities Affected by Mining), demanded investigations into what they said was a forced disappearance, torture and extrajudicial execution.</p> <p>On 19 September 2021, press sources revealed new accusations held against Newmont and Goldcorp for operating the Peñasquito mine, in Mexico.</p> <p>Since 2014, 11 lawsuits have been filed against the companies for social and environmental impacts of the Peñasquito mine that is taking over 1,250 hectares on land. The past accusations mainly focused on water scarcity the well built to sustain the mine's operations caused. An opposition which led the company to halt its mine's operations for almost 2 months starting April 2021 and resumed its shipment in July 2021. Landowners near the mine's site accused the consortium of illegally managing their lands by using false documents.</p> <p>For more context, the Public Registry of Property reported that between 1955 and 1969, the owner of the former Hacienda de Cedros land sold his 5000 hectares property to 25 different buyers, and the ownerships have widely varied ever since. One day, the owner of a 80 hectares' land noticed that the company built the well in a part of his property. This resulted in a court dispute in which Venegas, the land owner, said that Newmont Goldcorp provided fake records to obtain the National Water Commission to grant it the well concession. Venegas was reported to have won a sentence against the mining consortium in 2016, forcing it to return the land and the well, as well as pay rental prices and for other impacts.</p> <p>According to the plaintiff, his land is of significance given its large amount of water, which is why he thinks the company altered everything to construct the well, which is critical to its gold and silver output. However, since the mine opened in 2010, the stream that fed the villages has dried up. Moreover, apparently Venegas was not the only member of the community to be in this situation but many others owners as well. In July 2021, the properties' owners wrote a letter to President Andrés Manuel López Obrador seeking justice over their water's pollution from cyanide caused by the mine's metals extraction operations. [Mining Weekly, 11/06/2018, "Goldcorp says protest could halt production at Mexico gold mine": miningweekly.com] [Mining.com, 09/10/2019, "Peñasquito blockade lifted, operations still suspended": mining.com] [Business & Human Rights Resource Centre, 16/06/2021, "Mexico: Land defender José Ascensión</p>

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			Carrillo Vázquez murdered after opposing mining operations by Newmont subsidiary Peñasquito": business-humanrights.org
E(4).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Public response: In October 2019, the company provided a response to the BHRRC to "allegations of negative impacts on communities surrounding the Peñasquito mine in Zacatecas, Mexico", in the face of the October 2019 new blockade due to protests over environmental damage and difficult access to drinking water. Newmont said Peñasquito has already improved water availability for the mine's 25 neighbouring communities through a number of projects. The operation directly employs more than 6,500 people and supports another 20,000 indirect jobs in the region, Newmont Goldcorp said. The company also said in September it had offered \$25 million in community investments and land rental fees to resolve the conflict, but that the proposal was rejected. <p>On June 29, 2021, Newmont provided a response to the BHRRC on the disappearance and killing of the transport leader and social activist José Ascensión Carrillo Vázquez. In the response, the company stated: "This tragic incident was unrelated to our Peñasquito operations. [...] Newmont does not condone any form of attack against anyone, including those that classify as human rights defenders or anyone who opposes our activities. We call on the authorities to conduct a thorough investigation of this tragic incident and bring those responsible to justice." [Mining.com, 09/10/2019: mining.com] [Business & Human Rights Resource Centre, 29/10/2019, "Newmont Goldcorp responds to allegations of negative impacts on communities surrounding the Peñasquito mine in Zacatecas, Mexico": media.business-humanrights.org] [Business & Human Rights Resource Centre, 30/06/2021, "Newmont Response on the killing of José Ascensión Carrillo Vázquez": business-humanrights.org]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: Although Newmont provided two responses to the BHRRC, respectively in relation to the mine's adverse impact blockades and the extrajudicial killing of the social activist - the two cited responses are both rather general and do not address all aspects of the relevant allegations in detail. For instance, Newmont does not address the issue of the different illnesses related to the environmental pollution caused by the mine. Furthermore, it does not appear that the company provided any response to the other allegations considered in this section (the suspension of payments and social programmes to workers following the blockade, the illegal management of landowners' land). The company further has a statement available on its website addressing the issue of water at Peñasquito. However, the statement also does not address the allegation of illnesses related to the environmental pollution caused by the mine. [Water at Peñasquito, Mexico: newmont.com]
E(4).2	The company has investigated and taken appropriate action	1.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Engaged with stakeholders: According to the company's response of 29/10/2019, "In June 2019 Newmont Peñasquito voluntarily entered into a dialogue process sponsored and managed by the Mexican Government under the leadership of the Ministry of the Interior. The dialogue process successfully negotiated and resolved 14 of 19 issues brought by the leaders of CAVA/Cedros. Issues agreed upon included ongoing operation of potable water treatment plants constructed and operated by the company, water production wells, agricultural production wells, and numerous community investment projects. However, illegal blockades resumed in August and again in October." <p>According to the 'Stakeholder Claims, Events and Newmont Responses' page on the company's website: "Following the Goldcorp acquisition in April 2019, Newmont entered into a Government-led multi stakeholder dialogue process to address the concerns presented by members of the San Juan de Cedros community (one of 25 communities located in Peñasquito zone of influence). The dialogue process resulted in the resolution of a number of issues including a commitment from Newmont to operate potable water treatment plants, water production wells and agricultural production wells. [...] In December 2019 a historic water pact was agreed to, which included securing a sustainable water</p>

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			<p>supply for the Cedros community's domestic and agricultural uses. In August 2020, a significant milestone was reached with the formal ratification of an agreement with the Cedros community. The agreement involves sustainable long-term solutions related to the leasing of land for the operation, infrastructure for drinking and agricultural water and social investment. Importantly, it states that any future complaint will be resolved through dialogue and without blockages. Since 2019, regular monthly follow up meetings are held with all parties to track progress and ensure commitments are being met in line with the agreed schedule."</p> <p>On its website, the company states: "Minera Peñasquito interacts with 25 neighboring communities that are within our area of direct influence, distributed across three municipalities of the State of Zacatecas: Mazapil, Concepción del Oro and Melchor Ocampo, which collectively total more than 5,000 inhabitants." [Business & Human Rights Resource Centre, 29/10/2019: media.business-humanrights.org] [Operations and Projects - Peñasquito: newmont.com] & [Stakeholder Claims, Events and Newmont Responses: newmont.com]</p> <ul style="list-style-type: none"> • Met: Identified cause: In its response to the BHRRC in October 2019, Newmont shared that an independent reporter from Zacatecas conducted an investigation into the studies which concluded water contamination and health impacts and found that the clinics which conducted the analysis 'did not have equipment capable of analyzing samples nor the expertise to conduct such studies.' [Business & Human Rights Resource Centre, 29/10/2019: media.business-humanrights.org] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: According to the company's response of 29/10/2019, "Peñasquito has enhanced water availability for the mine's 25 neighboring communities through a number of projects including water treatment plants, new wells, pipelines and water trucks, along with 90 other infrastructure and community development projects. This includes installing and operating a Reverse Osmosis water treatment plant in the Cedros community in 2018 with a capacity of 600,000 litres of drinking water per day. In the specific case of the Cedros community, the company constructed a state-of-the-art medical unit that provides services to the entire community of Cedros and other nearby communities. The company has also conducted medical brigades in the community with the participation of the National Mexican Institute of Social Security and the Secretary of Health of the State of Zacatecas. These brigades include: dental care, glucose detection, hypertension detection and treatment, exams for cervical-uterine and breast cancer, vaccinations and eye exams". However, the fact that the protests started again in August and October 2019, and then again in 2021, suggests that these improvements did not actually produce any concrete effects in the lives of the stakeholders. It is not clear whether changes were made to prevent similar rights violations from recurring in the future. Furthermore, there is no evidence that the company has made changes to its management systems following the events and their human rights impacts. [Business & Human Rights Resource Centre, 29/10/2019: media.business-humanrights.org] • Met: Stakeholder input to steps taken: Newmont entered into a Government-led multi stakeholder dialogue process to address the concerns presented by members of the San Juan de Cedros community. The dialogue process resulted in the resolution of a number of issues including a commitment from Newmont to operate potable water treatment plants, water production wells and agricultural production wells. The dialogue process also led to the agreement to the water pact, which included securing a sustainable water supply for the Cedros community's domestic and agricultural uses, and to the formal ratification of an agreement with the Cedros community. The agreement involves sustainable long-term solutions related to the leasing of land for the operation, infrastructure for drinking and agricultural water and social investment. [Business & Human Rights Resource Centre, 29/10/2019: media.business-humanrights.org] [Newmont website, "Operations and Projects - Peñasquito": newmont.com] [Newmont Goldcorp responds to "allegations of negative impacts on communities...", 29/10/2019: media.business-humanrights.org] & [Stakeholder Claims, Events and Newmont Responses: newmont.com]
E(4).3	The company has engaged with affected stakeholders to provide for or	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Provided remedy: In April 2020, Newmont entered into a definitive agreement with one of the 25 communities in Zacatecas regarding " land use, water availability, infrastructure and social investments. This includes access to 10,000 hectares for exploration and operational purposes, and resolves all

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	cooperate in remedy(ies)		outstanding issues with the community." [Newmont to Begin Safely Ramping Up at Peñasquito, 13/05/2020: newmont.com] • Not Met: Evidence for lack of Impact or link Score 2 • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used

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