

Newmont

POL17- Ethics Policy (Iss 2)



Introduction

Ethical behaviour at work can be defined as 'moral principles that define how a business behaves'. For example, being honest, consistent and transparent in our dealings with others fosters a positive and trusting environment, which inspires confidence and respect in employees, customers, suppliers and the wider community. Following codes of practice which protect the health and safety of others, demonstrate a caring community and balance short term benefits with long term positive influence on society and the environment.

This Code of Ethics sets out the standards of behaviour that Newmont expects of you in your daily activities and dealings with others. It is not all inclusive but it addresses the most common areas where ethical behaviour is likely to come into play or where legal requirements dictate how we respond to various situations.

Ethical behaviour has a broad reach from social interaction within the company to more global human rights issues and slavery. The following policies will give you more detailed guidance as to the company expectations and, if followed, should ensure our role as an ethical company. Failure to follow these guidelines for business ethics may lead to disciplinary procedures and in some cases, summary dismissal.

Data Protection

The company complies with the Data Protection Act 1998 and General Data Protection Regulations (GDPR), which govern the protection of personal data in the UK. Specifically, information is to be used:-

- Fairly and lawfully
- For limited, specifically stated purposes
- In a way that is adequate, relevant and not excessive
- Accurate
- Kept no longer than is absolutely necessary
- Handled according to peoples' data protection rights
- Kept safe and secure
- Not transferred outside UK without adequate protection

The purpose of the Information Technology (IT) Policy is to ensure the effective protection and proper usage of the computer systems within Newmont, including protection of data related to employees and the business. It also addresses appropriate use of internet and social media to protect the reputation of the company, it's staff, customers and suppliers.

POL1 – IT Policy

Confidentiality

The Company recognises that confidentiality is a crucial part of the service it offers to its customers, its employees and anyone with whom we do business. You are required to respect this confidentiality at all times. The scope of confidentiality includes but is not limited to data, drawings, information, technical knowledge, photos, specifications etc. Employees as well as contractors are required to sign the confidentiality policy.

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POL2 – Confidentiality Policy

POL3- Confidentiality Policy Contractors

Anti Bribery

The Company is committed to operating in an honest and transparent way. You must not, directly or indirectly, offer; give; solicit or accept any bribe, either in cash or any other form of inducement, to or from any person or company. You must not, directly or indirectly, gain any commercial, contractual or regulatory advantage for Newmont Engineering in a way which is unethical. Abuse of entrusted power for private gain is considered unethical.

You must avoid giving or receiving gifts or entertainment if these might improperly influence the recipient's judgment or might be perceived to do so. If in doubt, you should check with management. Gifts can include goods, services, favours, loans, trips, accommodation or use of property, etc.

POL6 – Anti Bribery Policy

Equal Opportunities

The Company is committed to ensuring the fair and equal treatment of all employees and job applicants. There should be no discrimination on any grounds including age, sex, marital status, colour, race, political or religious belief, disability, sexual orientation. Decisions regarding recruitment, promotion, training and development, and terms and conditions are based solely on job related ability and merit.

The Company supports your right to dignity at work and expects employees to be free from harassment, bullying and victimization in the workplace, including all forms of sexual, physical and psychological abuse. As an employee, you are entitled to, and are expected to preserve, a positive, harmonious and professional work environment.

Employee Handbook – reference Dignity at Work

POL8- Equal Opportunities Policy

Conflict of Interest

Employees are required to confirm when joining (by signing their contract) that there is no conflict of interest in their role at Newmont i.e. they do not have a relationship with someone who might be a competitor or interested in obtaining information from the Company. Subsequently, if this conflict should occur, employees are required to report this immediately to their line manager. Conflict of interest could also be caused by having an additional job /interest whilst working at Newmont which could compromise your ability to do the job effectively and professionally.

Health and Safety

The company is committed to operating in a responsible manner which reflects good environmental management and follows policies which minimise staff exposure to potentially damaging chemicals or smoke. This includes but is not limited to; structured machine maintenance procedures, safe use and storage of chemicals, ethical manufacturing processes, environmental monitoring and responsible waste management. The identification and prevention of counterfeit products is essential to prevent potential risk to the safety of

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our staff and customers. Our Health and Safety manual addresses the methods and procedures in place to ensure these risks are appropriately managed.

Health and Safety Manual

Health and Safety Policy Poster – summary of Company commitment to H&S

POL11-Smoke Free Policy

POL12-Environmental Policy

POL13 – Health and Safety Risk Assessment Policy

PRO7-Counterfeit Product Control Procedure

PRO30-Risk Assessment and Recording Procedures

Chemicals and Substances of very high concern

Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) is a European Union regulation dating from 18 December 2006. REACH addresses the production and use of chemical substances, and their potential impact on both human health and the environment. Under this regulation, we are required to report the use of chemicals in our manufacturing process, which are defined as Substances of very high concern.

REACH Certificate of Compliance is a document certifying that a product is compliant with the EU REACH regulation (EC) No 1907/2006. It can be a testing report or statement issued by a third-party testing organization. It could also be a self-declaration.

REACH

Conflict Minerals

The Wall Street Reform and Consumer Protection Act, also known as the Dodd-Frank Wall Street Reform and Consumer Protection Act, includes requirements under Section 1502 for manufacturers of products that contain tantalum, tin, tungsten, or gold (collectively known as “3TG”), to identify minerals in their products that come from the Democratic Republic of Congo (DRC) or any of its adjoining countries and to file certain reports with the U.S. Securities and Exchange Commission (SEC).

Conflict minerals are minerals mined in conditions of armed conflict and human rights abuses, and which are sold or traded by armed groups. This has for some years been a particular problem in the DRC. The DRC’s mineral wealth is enormous. It is estimated that the country contains between 65-80% of the world’s columbite-tantalite (coltan) reserves, 49% of its cobalt reserves, and 3% of its copper reserves. Gold and diamond deposits remain under explored. Industrial Diamond reserves are estimated at 25% of world reserves.

We are required to keep a record of all materials which contain these minerals and avoid using them if they are mined in the Congo. All purchase orders have the following proviso to alert suppliers as follows:-

‘Newmont Engineering must be notified prior to accepting this order of any items that contain or may contain conflict materials (Cassiterite[Tin], columbite-tantalite [tantalum], gold, wolframite [tungsten] or derivatives thereof) originated in the Democratic Republic of Congo

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or bordering country. Newmont Engineering will not knowingly purchase material that has been sourced from conflict-affected and high risk areas.'

Who to Contact

If you have questions, need guidance or have grounds to believe that the Company, yourself or a member of staff is not behaving according to ethical guidelines in this policy, you may speak to your supervisor or team leader. If you are not satisfied with the response you may contact the Managing Director or Directors.

You have the right to remain anonymous. However, it is easier to conduct a full and fair investigation if the identity of those involved as well as your identity is provided. You will not be penalised for reporting or seeking guidance on how to handle suspected breaches.