



**BARRICK**

**BARRICK GOLD CORPORATION**

2018 Annual Report to  
The Voluntary Principles on Security and Human Rights

## Executive Summary<sup>1</sup>

Barrick Gold (hereinafter referred to as “Barrick” or “the Company”) began to implement the Voluntary Principles on Security and Human Rights (hereinafter referred to as the “Voluntary Principles” or the “VPSHR”) in 2007 by carrying out an independent, external risk assessment at a number of its sites. Through an iterative process over the intervening years, Barrick has gradually developed a system that identifies the security and human rights risks that the Voluntary Principles were set up to identify and address, and developed policies and procedures for ensuring compliance with them. Following the recent acquisition of Randgold Resources, Barrick will assess how best to apply the VPs under the new operating structure and incorporate them into the new risk management system.

The commitment of the Company to the VPSHR was formalized in 2009 by Executive Management and Board of Director approval of a corporate-wide *Security Policy* that explicitly commits the company to be guided in its actions by the VPSHR. Additional policies, standards and procedures were developed to implement specific elements of the Voluntary Principles into all of the Company’s internal security practices. Barrick formally applied and was accepted as a member to the VPSHR in 2010. This is the Company’s eighth report to the Voluntary Principles Initiative (VPI) Plenary.

Through 2018, the company developed a risk matrix to determine the security risk of a site or country. That ranking matrix is informed by a range of internal and external assessments and indicators, such as the Transparency International Corruption Index, the OECD country assessments and others. A Level 3 site would have the highest level of challenges and a Level 1 site has tended to be in countries such as the United States, Australia or Canada.

All of the Company’s Level 2 and 3 operations have assessed every two or three years by independent external specialists in the VPSHR for both risk profile and compliance with the VPSHR. Corporate security has conducted regular internal monitoring of compliance and carries out audits on a rotational basis of all Level 2 and 3 sites.

### **Some highlights regarding the implementation of the Voluntary Principles in 2018 include:**

- Incorporation of the UNICEF Child Rights and Security Checklist in the external Voluntary Principles assessments and applied new protocol to the assessments in Pierina, Lagunas Norte and Lumwana.
- Participation in the Steering committee retreat and in the selection process for a new Secretariat.
- Engagement with the new Secretariat during the transition process.

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<sup>1</sup> This report applies to sites that Barrick operates. Sites in which Barrick owns an interest, but does not operate, have their own policies, procedures, and approach to VPs implementation. The report also is informational in nature, and should not be construed or relied upon as assurance that the VPs are being implemented or followed in their entirety at any given location. The content of this report is limited to activities through 2018, and cannot and should not be construed to represent activities after December 31, 2018.

- Leading the VPI Training Project Working Group to develop a model security and human rights training package that will be available to all VPI members.
- Participation in the Canadian Voluntary Principles Working Group.
- Engagement with US and Canadian governments around Voluntary Principles implementation at a country level.
- Publication of our second standalone Human Rights report in 2018, which refers to the VPSHR extensively and recognizes security and human rights as a salient risk.
- Completion of the ICMM VPSHR Assurance process by Bureau Veritas at Pueblo Viejo in early 2018 for the 2017 assurance year and at Veladero for 2018 assurance process.
- Revision of Barrick Corporate's VPSHR Standard to align with international best practice guidelines and the UNICEF Canada's Child Rights and Security Checklist.
- Engagement by country security managers with relevant local governments and public security in our areas of operation.
- Increased conformance with the Voluntary Principles at Pierina and remained the same for Lumwana.

## **A. Commitment to the Voluntary Principles**

### *1. Statement of commitment or endorsement of the Voluntary Principles.*

In 2018, Barrick Gold remained strongly committed to implementing the Voluntary Principles across all of the higher risk sites that it operates. Barrick's formal commitment to the Voluntary Principles appears in its *Security Policy* at <http://www.barrick.com/files/security/Barrick-Security-Policy.pdf>

Barrick adopted and implemented the World Gold Council's Conflict Free Gold Standard to provide confidence that gold and gold-bearing materials are produced by Barrick in a manner that does not cause, support or benefit unlawful armed conflict, or contribute to serious human rights abuses or breaches of international humanitarian law.

Barrick has reported on its VPSHR related initiatives and ongoing assessments in its annual Responsibility Report and its Human Rights Report and makes public its Annual Report to the Voluntary Principles Plenary. The "Transparency Hub" on the company website has provided current and historic Responsibility Reports, the Conflict Free Gold Report and assurance statements, including Bureau Veritas' reasonable assurance letter on Barrick's implementation of the Voluntary Principles. The Company is a member of the ICMM and its public reporting has been aligned to the requirements of the Global Reporting Initiative (GRI).

Following the acquisition of Randgold, the new Company will be reviewing the strategic commitments made by both companies and merging these.

### *Engagement in the VPI*

In 2018, Barrick participated in the Voluntary Principles Plenary meeting, as well as the Security meeting and the Steering Committee retreat. In March, Barrick finished its tenure as a member of the VPI Steering Committee (tenure March 2016-March 2018), however the company remained involved in the selection process for the new Secretariat. Barrick has also engaged with the new Secretariat during the transition.

Since joining the Voluntary Principles, Barrick has participated in a number of VPI working groups, including the Verification Working Group, the Governance Review Working Group, the Outreach and Implementation Working Group, and the Training Project Working Group. As a member of the Training Project Working Group, Barrick continued to collaborate with other VPI members to develop a model security and human rights training package that will be available to all VPI members as of the 2019 Plenary.

Barrick, along with UNICEF Canada and the government of Canada, continued to co-lead the Child Rights and Security Working Group established to focus on security related impacts on children in the extractive sector. In March 2018, the Working Group launched the Child Rights and Security Handbook designed to assist governments and companies implement all the items in the Child Rights and Security Checklist published in 2017. In 2018, Barrick incorporated the checklist into its VPSHR assessments.

#### *2. Promoting awareness of the Voluntary Principles throughout the organization or government, including within the value chain.*

The Voluntary Principles have been integrated into Barrick's corporate systems (see B4 below) and there has been continuous reinforcement of the VPSHR at a site level through the training of security personnel and ongoing security and human rights assessments. Several sites have included a brief mention of the company's commitment to the Voluntary Principles in their employee and contractor induction. Security and human rights elements also were incorporated into the Company's human rights compliance program.

Barrick personnel have promoted awareness of the Voluntary Principles at several levels of government as well. In North America, in 2018, the Barrick's Chief Compliance Officer and Deputy Counsel engaged with US and Canadian government around Voluntary Principles implementation. Country Security managers engaged with local, regional and national government and public security in the areas where we operate.

For more information on how Barrick has promoted the Voluntary Principles at a site level with joint-venture partners, contractors, and host governments, see section C.

### 3. Promoting and Advancing the implementation of the Voluntary Principles Internationally

In Zambia, Lumwana has been actively involved in the Security Liaison Committee (SLC) comprised of a number of mining companies across the country. The VPSHR and security issues have been discussed with other companies in the SLC meetings. Barrick/LMC has been viewed by others as a leader in implementing the VPSHR and has been asked to share their practices. As an example, the SLC Chairperson asked LMC to share the Barrick Use of Force policies as it was observed that the national regulations and practices on the use of force were at variance with international best practices.

In Peru, the Country Security Manager is currently Vice-President of the Security Committee of the Sociedad Nacional de Minería Petróleo y Energía (SNMPE). He attends the monthly meetings of the SNMPE Security Committee, where other members are also signatories of the Voluntary Principles and where issues related to security and human rights in Peru are often discussed.

At Pierina, the site has continued to promote the Voluntary Principles with external stakeholders at the local level. The Public Relations and Social Closure teams distributed booklets to the community on the Voluntary Principles and Barrick's commitment to respecting human rights.

**Barrick y la comunidad**

Barrick protege a las personas y vela por la seguridad de sus operaciones.

Si sientes que se han vulnerado tus derechos, presenta tu queja o reclamo en la oficina de Relaciones Comunitarias.

**SEGURIDAD**  
trabajo conjunto:  
Barrick respeta a las personas y sus derechos

EMPRESAS ESTADO SOCIEDAD CIVIL

Si tienes alguna consulta puedes comunicarte a:

Oficina Barrick  
Jirón Libertad s/n  
Jangas (frente al mercado)

RPM #948175314 - RPC 943555907  
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**BARRICK**  
Minería Responsable

**PRINCIPIOS VOLUNTARIOS**  
de la Seguridad y las Comunidades

Figure 1 - Voluntary Principles Booklet

## B. Policies, Procedures, and Related Activities

4. *Relevant policies, procedures, and/or guidelines (or any changes thereof from the previous reporting year) to implement the Voluntary Principles.*

Following acquisition of Randgold, the new Company will review the policies and procedures for both companies and merge these to create a consolidated new Barrick management system.

Barrick's Security Management System in 2018 was anchored by the *Security Policy (2009)* and incorporated the implementation of the Voluntary Principles through, primarily, the *VPSHR Standard (2010)* and accompanying internal audit protocol developed in 2011.<sup>2</sup> Additional procedures and guidelines that formed part of this system and are related to the VPSHR include: a detailed Use of Force Procedure (2010); a *Code of Conduct* for security officials (Company or private); a procedure for apprehension arrests and detention (2011); a procedure for the reporting and escalation of human rights allegations and related legal violation (2011); a procedure for the investigation of human rights violations (2011); procedure for the procurement, use, storage and recordkeeping for weapons and/or ammunition under the International Traffic in Arms Regulations (ITAR); a procedure for the handling of confidential informants; a procedure for meeting, and entering into agreements, with public security officials or agencies (2010); guidelines for the management of artisanal and/or illegal miners (2008); procedure for the treatment and respect of women and children by security; a procedure for conducting formal risk assessments (2009); and a standard for managing risk (2015). The *VPSHR Standard* and accompanying internal and external audit protocols have been the most important drivers of Company performance in this area.

In addition, Barrick's Human Rights Policy (2011) has included a commitment to adhere to the requirements of the VPSHR. All sites have a grievance mechanism in which they record and track all incidents of human rights related allegations. These incidents can be categorized under Security if the grievance involves this department.

The Director of Global Security has overseen the operational implementation of the VPSHR. Security has worked closely with other departments such as Corporate Social Responsibility (including Community Relations) and the Office of the General Counsel (legal) to promote policy and procedural coherence in implementation.

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<sup>2</sup> This internal audit protocol is distinct from, and in addition to, the annual external audit for compliance with the VPSHR carried out by an independent external specialist.

In 2017, Barrick contracted Avanzar LLC to conduct a desktop review of the company's existing security and human rights (VPSHR) management system, including: related policies, procedures, standards, guidelines, training materials and monitoring and evaluation processes. The objective of the review, still ongoing, was to ensure that the VPSHR Standard is aligned with the most recent set of international guidelines and principles related to security and human rights. Avanzar cross referenced Barrick's VPSHR Standard and related policies and procedures with the following set of documents:

- a. VPSHR Implementation Guidance Tool, ICM, ICRC, IFC & IPIECA
- b. Auditing Implementation of VPSHR, Global Compact and Business for Peace
- c. Addressing Security Challenges in Complex Environments, ICRC & DCAF
- d. The Global Reporting Initiative
- e. Child Rights Security Checklist
- f. Child Rights and Mining Toolkit
- g. IFC Good Practice Handbook Use of Security Forces: Assessing and Managing Risks and Impacts

In addition to ensuring the VPSHR Standard is up to date and relevant, a second objective of the review was to improve the Standard's ease of adoption and use by Barrick's mine sites.

Due to the acquisition of Randgold, the revised standards have not been rolled out. Instead the new management at Barrick will again review all the policies and procedures for both companies to determine how they will be consolidated into a new Security Management System.

##### 5. *Company procedure to conduct security and human rights risk assessments.*

Barrick has used a set of criteria to determine whether its sites are classified as a Category 1, 2 or 3 security risk in relation to security and human rights (where 1 is the lowest risk and 3 is the highest risk). The Voluntary Principles have been incorporated into this risk assessment tool, including: the strength of the rule of law in a country; documented security and human rights violations; and the institutional strength of a country's public security. A review of human rights reports by governments, international agencies and non-governmental agencies, combined with on-the-ground interviews with governmental, non-governmental and community actors informed this risk assessment.

In addition to the corporate level risk assessment, each site operated by Barrick has been required to complete an annual security risk assessment that includes an assessment of security and human rights related risks (e.g. the risk of public security using excessive force while managing a security incident on a Company site). Sites have been required to identify both existing and additional controls to avoid or mitigate such risks. The identified site risks were sent to the Director of Global Security for review, and for most of 2018 were the Risk Management and Assessment Department through weekly Business Plan Review (BPR) meetings.

Independent assessors from Avanzar LLC<sup>3</sup> also assessed site level security and human rights related risks and the sites' level of compliance with the Voluntary Principles every two to three years (see Appendix I for more information on the external assessment framework). In 2018, external assessments conducted by Avanzar at the Pierina and Lumwana sites found that security managers identified the risk of trespassing and potential human rights violations of public and private security personnel. All assessed sites could add more information regarding risks to children and women as part of their security risk assessment to comply with the UNICEF Canada Child Rights and Security Checklist.

6. *Company procedure or mechanism to report security-related incidents with human rights implications by public/private security forces relating to the company's activities*

Barrick has had two channels for reporting security-related incidents with human rights implications by either public or private security forces in relation to the Company's activities:

- i) All sites have been required to have a grievance mechanism that meets international standards (specifically the UN Guiding Principles on Business and Human Rights). This mechanism has been managed through a Grievance Officer within the Community Relations or Sustainable Development departments and any grievance or incident, including a security-related one, can be reported by a third party via this mechanism. Less serious security-related incidents (such as, perhaps, verbal abuse by a public security official against a local resident) might be identified and dealt with through this site mechanism.

Third party assessments conducted by Avanzar at Pierina, Lagunas and Lumwana revealed that the sites were implementing grievance mechanisms aligned with Barrick corporate standards. Avanzar found that community members at Lagunas Norte were

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<sup>3</sup> The external assessors that have been used by Barrick to date for these VPSHR reviews have been Jim Rader, Christina Sabater, Melissa Whellams and Marc Forget from Avanzar LLC. Rader is a former international development professional who worked as Director of the Extractives Program at Business for Social Responsibility (BSR). In his capacity at BSR, he represented that organization on the Secretariat of the Voluntary Principles for a number of years. In 2005, he also directed a confidential study of the implementation progress of all VPSHR members. Sabater trained as an ISO-certified auditor and was a lead social auditor for a major mining company for a number of years. She also worked as a Sr. Manager at BSR. Whellams has a Master's degree in international development and worked as a Sr. Manager for Canadian Business for Social Responsibility for a number of years. She has carried out numerous social and security related assessments with extractive companies. Marc Forget is an experienced human rights trainer working with a number of international organizations including the United Nations and has worked closely with conflict resolution processes in Latin America and Africa. Together, these four individuals have carried out over 90 VPSHR assessments with a variety of extractive companies on four continents. The reports produced by these assessors are treated with high priority and go directly to the Office of the General Counsel and the Chief Sustainability Officer for their information and for items to be actioned.



well aware of the grievance mechanism, trusted it, used it and found it more useful than using protests to solve grievances. Lumwana's Sustainability department has been communicating with the community about the grievance mechanism through a local drama group. Over the past year the site has also surveyed the community about the effectiveness of the grievance mechanism. The site found that due to low literacy rates people were having trouble submitting grievances in writing. To improve access to the grievance mechanism, the site established offices in each of the Chiefdoms so people could register complaints in person. Stakeholders were not interviewed for the Pierina assessment, so the assessor was unable to validate the perceptions of the mechanism in the community.

- ii) More serious security-related human rights incidents that are deemed to be material (for example, allegations of serious injury or death) might be surfaced through either the grievance mechanism procedure described above or, more likely, through a direct incident report by the site Security or Community Relations Departments. For example, in Peru G4S has its own Security Incident reporting procedure which channels any incident to the Barrick Security Manager. Internal and external stakeholders also have been able to report incidents via the company's Compliance Hotline.

Barrick has had a *Human Rights Violation Reporting and Escalation Procedure* that requires all of Barrick employees and contractors to report any actual or potential human rights violations to mine or project management, in-house legal counsel or through the Barrick Compliance hotline. Category III allegations, such as those related to security and human rights, have been referred to the Country/Regional Legal Counsel and the Office of the General Counsel.

In addition, Barrick has had a procedure for the *Investigation of Security Related Human Rights Allegations*. This procedure has required a site to immediately notify the Office of the General Counsel and the Chief Sustainability Officer for any serious incident involving private or public security. The Office of the General Counsel would then ensure that an external investigation of the incident or allegation is carried out by specialists in the area to try and understand the underlying factors (root causes) behind the incidents. All reports from these investigations are commissioned by the Legal department and have been treated as privileged and confidential.

For official government investigations, Barrick typically has cooperated with government investigators through the provision of information and data relevant to the allegations. When possible, the company has stayed abreast of the status of the investigation through continuous contact with the government and public security.

All security related incidents have been required to be reported via the security reporting requirements and a summary has been communicated through the General Managers and Country Security Manager to operations Executive Management on a monthly basis. When necessary, through 2018, the Global Security Manager, Deputy

Counsel and the Chief Sustainability Officer also presented key events and findings to the Corporate Responsibility Committee of the Board of Directors.

7. *Company procedure to consider the Voluntary Principles in entering into relations with private security providers.*

Through 2018, Barrick used Company security officials and/or private contractors to provide security at all level 2 and 3 sites, depending on the situation in the countries in which its sites are located. The Company carried out due diligence on each private security provider that it employed, including looking at such issues as: professional reputation in the country or industry; reported cases of violence by its personnel; awareness of security and human rights issues; screening procedures for its security personnel; company training programs on the use of force and other VPSHR-related elements; codes of conduct; and where the company recruits its security guards from (e.g., whether they are ex-military or police or young people who are then trained as security guards).

Barrick contractually required all private security contractors to be compliant with the Voluntary Principles, as well as Barrick policies and procedures relating to such things as the Use of Force, the Security Code of Conduct and the Human Rights Policy. Compliance with the VPSHR and the ability to monitor this compliance was incorporated into the service agreements of all contractors.

The independent third party Voluntary Principles assessors reviewed a variety of elements to assess the degree to which private security contractors are compliant with relevant elements of the standard, including: the relevant parts of the service agreement requiring compliance with the Voluntary Principles and Barrick security policies; security-related human rights background screening procedures (verified by reviewing personnel files and hiring documents); human rights and use of force training programs (verified by reviewing training materials and assessment of training documents such as post-training tests); comprehension of private security officials on their responsibilities under the Voluntary Principles (verified through on-site interviews and scenario testing); and other elements.

8. *Company procedure or mechanism to investigate and remediate security-related incidents with human rights implications by public/private security forces relating to the company's activities*

Through 2018, Barrick maintained a zero-tolerance policy for security and human rights related violations at its sites and takes active measures to enforce its policies and procedures to try to prevent such violations from occurring. Mine site investigations personnel have investigated all incidents involving the use of force and independent investigators have been brought in to investigate incidents involving serious injury, death or human rights violations. In their assessments, Avanzar found that not all allegations against public security were investigated and followed up, and greater diligence is appropriate to

follow-up on allegations of human rights abuse against public security when they apprehend trespassers on Barrick sites or receive detainees.

Through 2018, Barrick's Human Rights Compliance program outlined how the company addressed breaches of its human rights policies or procedures. For third party suppliers, discipline for committing human rights violations, failing to report violations, and hindering investigations could include termination of existing relationships, requests for focused training, and other measures. In addition, when Barrick has identified negative human rights impacts that the Company has contributed to or caused, the Company has sought to take a culturally appropriate and thoughtful approach to remediation, as per the Barrick Human Rights Remediation Procedure. In assessing when remediation may be appropriate and the nature of the remediation to be provided, Barrick recognized the importance of victim participation, stakeholder input, as well as the potential need for independence from the operational unit that may be involved in the negative impact. While remedies for negative human rights impacts will naturally differ depending on the circumstances, in-kind remediation has been often preferred to cash, and sites have adopted guidelines that consider such factors as: the degree and nature of the harm suffered, whether mine personnel were involved and on duty, whether third party perpetrators used mine resources or committed an act related to their contracted duties, the nature of the evidence in support of the claim, the individual's age and personal circumstances, and local laws.

In 2018, external assessment found there were no substantiated human rights and security related allegations against private security personnel at Pierina, Lagunas Norte, or Lumwana. There were, however, cases in which private security personnel were sanctioned/terminated for breach of Barrick policy and procedure with regards to detention, custodial care and reporting of security incidents.

### **C. Country Implementation**

#### **9. *Overview of country operations selected for reporting (include any notable changes from the previous reporting year if the same country is being reported this year)***

The Lumwana (Zambia), Pierina and Lagunas Norte (Peru) sites are the focus of this year's report as thorough external assessments of their compliance with the VPSHR were conducted in 2018.

#### **10. *Engagements with stakeholders on country implementation***

In Peru, through 2018, the Country Security Manager was the Vice-President of the Security Committee of the Sociedad Nacional de Minería Petróleo y Energía (SNMPE). He attended the monthly meetings of the SNMPE Security Committee, where other members are also signatories to the VPSHR, and where issues related to security and human rights in Peru were often discussed.

In 2013, Barrick became an official member of the Peru Working Group on the VPSHR. This group was comprised of governments (e.g. various embassies, Peruvian ministries), NGOs, and mining companies. The Working Group has not met as regularly in the past years and in 2019 there will be efforts to determine potential for continued participation.

The Peru Country Security manager also met with the high-level Commanders at the *Policía Nacional de Perú* to discuss security issues, the MOU with the company, changes at Barrick, and payment structures. The Security Supervisor worked at a more local level, meeting with local and regional police and with security supervisors of neighboring mines to discuss the security situation in the area and share information.

Lumwana has been a member of the Security Liaison Committee (SLC), comprised of a number of mining companies across Zambia. The SLC members met regularly to discuss VPSHR and security related issues. Outside of the SLC, the LMC Security Manager also liaised regularly with the Security Manager at the neighboring FQM mine. LMC also actively promoted the VPSHR with the Zambian police. LMC has had an MOU with the Zambia Police Service which requires compliance with the VPSHR and international law enforcement principles. Lumwana has had ongoing contact with the Zambia Police Service at the district level in Solwezi and the Security Liaison for LMC met with local police on a weekly basis. The site also delivered training on the VPSHR and other human rights-related topics to the police personnel who provided policing services to the area around the site.

*11. Voluntary Principles considerations in the selection of private security providers and formulation of contractual agreement with private security providers, as well as an arrangement with public security forces*

*Private security*

For information on the selection of private security contractors and formulation of contractual agreements with these, please see the answers to number 7 above.

With regards to selection of individual guards, through 2018, Barrick policies stipulated that security personnel at all sites must pass a pre-employment screening that included a criminal background check. Barrick policies also provided that contractor security personnel must provide proof of background check when assigned to the site.

In Peru, both mines conducted background checks on all site employees, including private security contractors every six months. These checks included a review of any judicial and penal antecedents for criminal activity.

In Zambia, all Lumwana Security employees were required to pass a criminal background check /police clearance before they were hired. All private security contractor employees also were required to complete a criminal background check and sign a declaration which stated that they have no relation to government institutions and have had no history of

human rights violations. Lumwana's contract with its private security provider required compliance with the VPSHR.

### *Public security*

Through 2018, Barrick had a specific procedure that guides sites on how to enter into and manage written agreements with public security agencies. This procedure notes that prior to entering into and managing any agreements with public security agencies for any additional external security that might be needed at Barrick sites, the Company will carry out due diligence using external specialists to help it identify any challenges there might be in working with these agencies. This includes examining external human rights reports and the national laws that regulate the conduct of these agencies, particularly in such areas as the use of force, treatment of apprehended persons, incident review processes, etc.

The Company then would begin a dialogue with public security officials about the arrangements for any additional external security support. These discussions included expectations related to conduct of the public security officials providing the external site support and compliance with national or international human rights and security laws or standards. Some scope has been given to allow for national differences about how adherence to these norms might be expressed.

In Peru, the Memorandum of Understanding (MOU) with the Peruvian police was signed on November 2017 and requires that all PNP comply with Peruvian law, national and international standards related to human rights, as well as most Barrick principles, policies and standards. The MOU states that the police are responsible for providing training on security and human rights and the consequences of not complying with these requirements; requires that both company and police will respect all local and internal human rights laws in order to ensure that the local communities are not impacted negatively and compliance with the Basic Principles on the Use of force and the Code of Conduct for Law Enforcement Officials. The MOU does not include compliance with Barrick's Human Rights Policy or the Voluntary Principles. In 2018, an addendum was drafted and sent to the Police, but it has not been signed as of the date of this report.

Lumwana's Memorandum of Understanding (MOU) with Zambia Police Service clearly states the obligation of police personnel to "comply with all applicable laws and regulations of the Republic of Zambia;" and "comply with relevant international legal instruments regarding the use of force, proportional force, and the minimum force necessary to control any violent situation, including the Voluntary Principles on Security and Human Rights, the UN Code of Conduct for Law Enforcement Officials, and the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials ("International Law Enforcement Principles)". It also stipulates that no Police personnel shall be deployed to the Affected Area who have been the subject of credible allegations of violations of International Law Enforcement Principles or of other legal violations, and that only Police personnel who have been briefed on the terms and conditions of the MOU, and who have received training by

Police or others in relation to the principles and standards of the International Law Enforcement Principles, shall be deployed to the Affected Area.

*12. Examples of supporting outreach, education, and/or training of (i) relevant personnel, (ii) private security, (iii) public security, and/or (iv) civil society (e.g., local NGOs, community groups)*

Through 2018, Barrick policies provided that all security personnel at designated Level 2 and 3 sites receive training on the Voluntary Principles, the Barrick Use of Force Procedure and the Security Code of Conduct before they begin work during employee induction. At least once a year, all guards received a refresher training. Comprehension is tested through written and/or oral exams. Most sites adopted scenario testing to more realistically simulate field conditions and improve comprehension. After each annual refresher, guards signed a declaration to certify that the person has received the training, has understood it and will apply it in the course of implementing their job responsibilities.

Barrick policies required that all direct and contracted security personnel complete training on specific elements of their job responsibilities that have some bearing on security and human rights, such as weapons handling and storage; treatment of injured persons; handling of apprehended individuals; identification and reporting of security-related human rights allegations; and others. At higher risk sites, security personnel were also given some training on how to identify and how to report sexual assault and sexual harassment.

To reinforce the implementation of the Voluntary Principles on a daily basis at the site level, sites have provided guards with reference cards on the Use of Force and the Voluntary Principles, posted human rights and security related policies and procedures at guard posts, main gates, and security offices. At some sites, the Security department has distributed VPSHR related reference books to all guards. In addition, the Security departments have reviewed specific security and human rights related policies and procedures (e.g. Use of Force, Arrest and Detention) with guards during daily shift changes.

In Peru, the Security department has developed training programs on the VPSHR (including Barrick's Use of Force Procedure, the Barrick Security Code of Conduct and human rights), for all Barrick security personnel and G4S guards. New guards receive the detailed induction training upon arriving on site. According to the site's training plan, these trainings are repeated with all security personnel once a year. After each induction or refresher training, the site tests the security personnel's level of knowledge about the VPSHR and Security and Human Rights related procedures with scenario-based exams. Brief shift change chats on various topics are given daily. Every few weeks, supervisors discuss topics related to human rights and security.

In Zambia all security personnel working at Lumwana have been required to complete induction and annual compliance trainings, which include Use of Force, VPSHR, Sexual

Harassment, Arrest and Detention, and Security Code of Conduct. All guards have had to receive a minimum passing grade of 80% in order for the training to be considered “complete.” Guards who have not received a passing grade are given a week to review the material and then are tested again. If they have not passed, they would not be hired to work on site.

At all sites where public security forces provided some additional external security protection, one or more of the following orientation courses of deployed police officials was held by the site or a contracted third party: the MOU between the public security agency and the Company; the Voluntary Principles; the United Nations Basic Principles on the Use of Force and Firearms for Law Enforcement Officials; the United Nations Code of Conduct for Law Enforcement Officials; Human Rights; the Barrick Use of Force Procedure; and most include Sexual Harassment.

In Peru, the Security teams at Lagunas Norte and Pierina provide monthly training to the police/military personnel stationed on site on the Voluntary Principles, the Use of Force, Barrick’s Security Code of Conduct, and human rights in general. In 2018, the National Police updated their Human Rights Manual to include the Convention on the Rights of the Child. As a result, the site is considering adding aspects of child rights protection in the monthly training to align with the Manual and the UNICEF Child Rights and Security Checklist.

## PHOTO

In Zambia the officers posted to Maheba Police Station (Maheba is responsible for police services to the area surrounding the mine) were trained by LMC Security Trainers who give the police the same compliance trainings that are given to private security guards. Training has been conducted when new officers are stationed at Maheba and when new officers are assigned to the site under the MOU. A total of 114 police officers were trained between 2017 and 2018.

In addition to outreach with private and public security, Barrick sites have worked to communicate their commitment to the Voluntary Principles and respect for human rights to its communities of impact. In Peru, the Pierina Social Closure department distributed booklets to community members on the Voluntary Principles and Barrick’s commitment to human rights in July 2018 during a series of community visits. A total of 1207 community members were engaged during this program. See photo below.



Figure 2 – Information Campaign, Pierina Mine, July 2018

In coordination with the Sustainability Department, the Security Department at Lumwana has met with the community on a couple of occasions in the past year to communicate the dangers of trespassing and emphasize the importance of mutual respect between trespassers and security personnel. The site also established a youth group in the Lumwana Township that conducts joint patrols with Security personnel at night. Youth group members have been trained on the VPSHR and other Barrick security and human rights related policies and procedures. In 2018 the site contracted a third party to conduct a perception survey in the community on security in the area and the site's security arrangements. The survey included 521 respondents from Lumwana East, Manyama and Kananga areas. The Security department has been working to address feedback provided by respondents and will collaborate with a local drama group to communicate with the community about security related issues in 2019.

### *13. Company procedure to review progress on implementing the Voluntary Principles at local facilities*

Barrick opted in to the corporate pillar verification framework and taken various measures to assess its sites' performance against the Voluntary Principles requirements including both internal reviews of employee performance and external compliance assessments. The implementation of the Barrick *VPSHR Standard* has required that VPSHR-related responsibilities are integrated both horizontally and vertically in key position descriptions and annual performance assessments throughout the organization and not just in direct security-related positions, including at sites, country, regional and corporate offices.



Through 2018, Barrick's Risk Management and Assurance Department was responsible for carrying out audits related to security at level 2 and 3 sites. The audits included a review of sites' implementation of the Use of Force Procedure, the Security Code of Conduct, pre-employment screening procedures, and implementation of public security MOU's. Each audit produced an action plan where required.

Level 2 and 3 sites have been required to have at minimum a bi-annual or tri-annual external, independent VPSHR security and human rights assessment in relation to their compliance with the Voluntary Principles. The independent external assessor has produced an action plan for identified opportunities for improvement, and implementation has been monitored by corporate security.

In 2018, independent third-party consultant, Avanzar LLC, conducted on site assessments against Voluntary Principles requirements at Pierina, Lagunas Norte and Lumwana. Avanzar evaluated the sites' performance in the areas of demonstrated level of commitment to and accountability for the implementation of the Voluntary Principles; risk assessment; measures taken to promote the Voluntary Principles with private and public security; processes to manage allegations related to security and human rights; and the effectiveness of engagement with external stakeholders both locally and nationally on the Voluntary Principles. See Appendix I for an overview of Avanzar's assessment framework.

*Assessment Results:*

- Pierina showed increased conformance with the Voluntary Principles since their previous assessments. Due to security staff turnover, Lagunas Norte required additional training to match the previous year conformance. Lumwana's performance remained the same as last year's assessment.
- Private security personnel (both Barrick and contractor) were well versed in the Voluntary Principles and Barrick security and human rights related policies and procedures at Pierina and Lumwana. Greater efforts to train guards at Lagunas Norte are needed in 2019.
- At both Pierina and Lagunas Norte, community activists protested several times at the Mine gate. At Lagunas Norte, the protestors threw some stones. In Pierina, the protestors were peaceful. For both instances, the protests were resolved with dialogue between the mine's Community Relations staff and the community stakeholders. Police were not required to be present nor intervene. The risk of violence in a protest has decreased as the mine focuses on ensuring a negotiated resolution to protests.
- In 2018 community members at Lumwana blocked the bypass road to the mine with rocks and branches on a number of occasions. Security personnel remained calm

and the blockades were removed without incident. Security personnel have been attacked by trespassers in the past year (e.g. throwing stones) but there have been zero incidents of retaliation by guards. Injuries to guards has been raised a serious concern in SLC meetings and member companies have been discussing opportunities to address this concern with the Zambian government. See section D14 for more under lessons learned.

In addition to the Security and Voluntary Principles assessments, through 2018, Barrick had a human rights program that includes independent stand-alone human rights assessments conducted by third party consultant Avanzar LLC. Avanzar assessed the actual, potential, and perceived human rights risks and impacts at high-risk Barrick operations and advanced projects. One of the categories of assessment was security and human rights, which looks at how human rights could be impacted by the company's security arrangements. Fund for Peace, a well-regarded NGO that works to prevent conflict and human rights abuses and is on the VPs Steering Committee, has served as an external and independent advisor to the company in this program. Their role has included reviewing and editing the assessment tool being used, providing guidance on the assessment plan, reviewing reports, and discussing follow-up priorities. Professor John Ruggie, former UN Secretary General Special Representative for Business and Human Rights, may also provide advice and guidance on discrete issues associated with the assessments.

#### **D. Lessons and Issues**

##### **14. *Lessons or issues from this reporting year, as well as plans or opportunities to advance the Voluntary Principles for the organization***

Barrick has continued to see the value in promoting and implementing the Voluntary Principles at its sites and in the countries in which it operates. Ongoing training of guards generally reduces the risk of human rights related violations and helps security personnel to effectively manage conflict situations while respecting human rights.

One challenge to implementation is staff turnover. High turnover at a Country Security Manager level in Peru led to reduced consistency in the implementation of the Voluntary Principles. Specific training for Security managers could provide a smoother transition during turnover.

In 2018, Avanzar led the implementation of a revised Voluntary Principles Assessment protocol to include the UNICEF Child's Rights and Security (CRS) Checklist. Several lessons were learned from this inaugural year and they will be applied in subsequent assessments.

Avanzar found that imposing new requirements at mine sites without a proper roll out or training can lead to their rejection. Pierina and Lagunas Norte were not aware that Barrick was now incorporating the Child Rights and Security Checklist into its assessments. As a result, the security personnel were concerned about the impact of the lower performing

assessment. In order to allay the concerns and ensure adoption of the new requirements, Avanzar and the corporate office agreed that the first assessment using the Checklist would be a baseline assessment that would not affect scores which are tied to compensation. Furthermore, as part of the assessment, Avanzar gave detailed recommendations on how to implement the CRS Checklist and filled the training gap.

Another challenge with implementing the Checklist was the requirement to engage children around security issues. Section 12 of the CRS Checklist requires that companies engage children around security arrangements. When faced with these requirements, security managers did not know where to begin to comply. What issues should be discussed, how should the engagement be structure in a respectful and meaningful way with children? We find that greater guidance is needed in this area, including when it may not be necessary to engage directly, but through youth advocates.

### *Lumwana*

At Lumwana, third party assessors found that perception surveys can be useful in obtaining feedback from the community about security. The site has conducted surveys in both Lumwana Township and in the communities around the mine site. Surveys may include questions about the site's security arrangements in general, impacts of the site's security arrangements on the community, and feedback on guard conduct or police conduct.

Another lesson learned from Lumwana is the value of a "Training Manager" software to track training and notify the site when a guard's training has expired. The implementation of the software has enabled the site to stay abreast of refresher training and ensure that guards who a licensed to carry weapons are up to date on their training requirements.

As mentioned in section C.13, injuries to guards by trespassers has been raised as a concern by members of the Security Liaison Committee in Zambia. During meetings this year it has been discussed that while state security officers are guaranteed personal protection from aggression in the performance of their duties, private security personnel do not have such protection. For the example, an assault on a police officer is expressly enshrined in Zambian statutes and the consequential punishment is stiffer than an ordinary assault. Private security personnel perform similar duties to those of the state security personnel but are not specially protected from acts of aggression by the people they encounter during the performance of their duties. It was suggested that there must be an Act of Parliament that must be established to regulate the private security industry whose objective, among others, must be to protect the private security operatives during the performance of their duties. The SLC is trying to encourage the government to enact new legislation to protect security guards.

Due to the Barrick-Randgold transaction, 2019 will bring about much change to the company and its systems. Currently, Barrick is reviewing all policies and procedures and undergoing an integration of the two companies, including those referenced above. The

company remains committed to the Voluntary Principles and to continually improve implementation throughout the new company.

At present, the following efforts are planned for 2019:

- Participate in the Annual Plenary Meeting of the Voluntary Principles Initiative on Security and Human Rights in London, UK in March 2019.
- Contract Avanzar to conduct independent third party Voluntary Principles assessments at Jabal Sayid, Pueblo Viejo and Veladero.
- Contract Bureau Veritas to provide assurance on VPSHR implementation at select sites.
- Continue to collaborate with UNICEF Canada addressing children's rights under the Voluntary Principles framework. This includes documenting lessons learned during implementation and creating awareness of Child Rights and Security Checklist.
- Complete the model security and human rights training package for VPI members, with the VPI Training Project Working Group.
- Increase participation in the Peruvian SNMPE Security Committee and promote the Voluntary Principles in this group.
- Continue the intensive induction training on the Voluntary Principles and Barrick's related policies and procedures with the new Security management team in Peru.

## APPENDIX I

### External Voluntary Principles Assessment Framework

Barrick believes that security at a mine site is, generally, a function of three elements:

1. the physical security provided by the security or asset protection departments;
2. the overall relationship with the surrounding communities; and
3. the overall respect for the rule of law and the strength of institutions that enforce the law (i.e., public security, the judicial system) within the particular area or country where the mine is located.

Consequently, the Voluntary Principles' risk assessment tool that the Company employs attempts to assess security-related human rights risk in all three areas. Obviously, the ability of a company to influence the different areas varies, and this variability must be addressed in the actual efforts that an operation makes to reduce the identified risks in each of the different categories.

The assessment tool used by the external assessors is based on ISO standards for management systems (such as 14000) and on the AA1000 principles for assurance: inclusiveness, materiality, and responsiveness. The template is comprised of seven sections or categories of assessment, including: company management, company or private security, public security, engagement with local or Indigenous communities, the political-legal setting of the country, artisanal or illegal miners and the potential for violence. Each category has a series of sub-elements and the majority of content of the categories and the elements are drawn directly from, and test compliance with, the Voluntary Principles. There is a total of 114 elements assessed in each external VPSHR assessment.<sup>4</sup>

However, the risk assessment tool also draws on the field experience of Avanzar's principals in engagement with external stakeholders, including local communities, indigenous peoples, and artisanal or illegal miners and a significant number of elements assessed are drawn from the field experience of the assessors. While the Voluntary Principles do not explicitly require an analysis of relations with such external stakeholders, the nature and quality of the relationships that a site maintains with these actors will have a direct impact on the security-related human rights risk environment which it faces.

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<sup>4</sup> At present, Barrick uses the term "assessment" for these evaluations rather than "audit," as that latter term implies a commonly accepted set of standards and practices for carrying out such assessments. The external VPSHRs assessments are increasingly moving towards a greater audit discipline but are not quite there yet.