



2022 Annual Plenary Report

*The Voluntary Principles on Security
and Human Rights*

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Newmont's Implementation of the Voluntary Principles

Newmont is the world's leading gold company and a producer of copper, silver, zinc and lead with headquarters in Denver, Colorado. We directly manage operations and development projects in Argentina, Australia, Canada, Ghana, Mexico, Peru, Suriname and USA. Our global human rights strategy supports our efforts to embed respect for human rights into our policies, due diligence, systems, programs and activities across the business, and it is central to delivering on our broader business strategy and overall purpose to improve lives through sustainable and responsible mining.

Newmont has been a signatory to the Voluntary Principles (VPs) since 2004 and strict adherence to this standard is a central part of Newmont's commitment to respect and promote human rights, foster strong community relationships and secure social acceptance for our operations in a safe and responsible manner. This 2022 Annual Voluntary Principles report is a Full Report as per the Corporate Pillar Reporting Guidelines.

(A) Commitment to the Voluntary Principles

Public Statements of Commitment to the Voluntary Principles

Respecting human rights is the first step towards fulfilling our purpose to improve lives through sustainable and responsible mining. The VPs guide our approach to our security arrangements and help ensure we respect human rights while protecting our personnel and physical assets. Newmont publicly commits to the continued implementation of the VPs at all our sites through our participation in the Voluntary Principles Initiative (VPI), our policies and standards published on our website and our public reporting.

Since our last full VPs Annual Report in 2019, Newmont revised, updated and rolled out to our sites several policies to reflect current social expectations of the role business must play. In these revised policies, the Global Governance Committee of the Board of Directors re-committed Newmont to implementing the VPs.

"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. ... We are committed to implementing the Voluntary Principles on Security and Human Rights through proactive engagement and training of personnel."

- [Newmont Sustainability and Stakeholder Engagement Policy \(2020\)](#)

"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."

- [Newmont Human Rights Standard \(2020\)](#)

The Group Executive for Security is responsible for the day-to-day oversight and execution of the VPs at a site level. The Executive Vice President, Strategic Development and Sustainability is responsible for overall implementation, and reports to the Chief Executive Officer as well as the Safety and Sustainability Committee of the Board of Directors, which has ultimate responsibility for Newmont's compliance with the VPs.

Engagement with the Voluntary Principles Initiative

In 2022, Newmont participated in the VPI's Corporate Pillar meetings and the Annual Plenary held in Toronto. Newmont staff also provided input to the Strategic Review process through interviews and attendance at the Strategic Planning retreat held in December in Geneva. At a country level, Newmont participated in the VPI-sponsored In-Country Working Groups in Peru and Ghana. More detail is provided on these below and in Section (C).

Transparency and Reporting

Newmont aims to lead on transparent reporting of our targets and activities. In 2022, we reported on our commitment to the VPs and performance in our [2021 Annual Sustainability Report](#). In 2022, we also published an updated version of [Respecting Human Rights: Our Approach](#). The [annual VPs report](#) is also accessible on the Newmont website.

In Newmont's 2021 Sustainability Report, the Chair of the Safety and Sustainability Board Committee reported that the Committee receives regular updates on the implementation of Newmont's security strategy, including engagement with host communities and efforts to deploy state-of-the-art technology to enhance the safety and security of our operations. We also reported on our Voluntary Principles training and key security and human rights matters at our operating sites.

We continue our commitment to implementing the World Gold Council's Conflict-Free Gold Standard. In our [2021 Conflict-Free Gold Report](#), we summarize how our gold is extracted 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. PriceWaterhouseCoopers assured that the report was produced in accordance with our [Conflict-Free Gold Standard](#) for the year ending December 2021.

Newmont promotes the importance of respecting human rights and the VPs with employees and contractors through induction training and employees also undergo periodic online refresher training. Newmont also promotes the implementation of the VPs in the countries where we operate, with governments, civil society and local communities through direct engagement and participation in VPs In-Country Working Groups (ICGW). Below we provide two examples of these efforts.

Peru: Newmont has continued its participation in the National Human Rights Working Group dedicated to the development of the National Action Plan that details how Peru will implement the UN Guiding Principles on Business and Human Rights (UNGPs). In 2022, Newmont worked actively with the Human Rights Committee of the Sociedad Nacional de Minería, Petróleo y Energía (SNMPE) to develop events for security managers and promote training on human rights for the industry. Lastly, Newmont is working with other mining companies who are members of the VPs to create a separate working group dedicated specifically to the implementation of the VPs in Peru.

Ghana: Since Ghana joined the VPs, we have actively worked with the Chamber of Mines and the Ghana In-Country Working Group to promote the VPs. In the 2021 and 2022 annual meetings, the Working Group discussed the results of the Commission on Human Rights and Administrative Justice's (CHRAJ) baseline study on security and human rights in the extractives sector. In 2022, the Group developed and reviewed a training curriculum for police on the VPs and protection of human rights. For more details on the promotion activities with public and private security in Ghana, please see the Country Implementation Section (C).

(B) Policies, Standards, Procedures, and Related Activities

Relevant Policies, Standards, Procedures, and/or Guidelines to Implement the Voluntary Principles

Newmont has a hierarchy of policies, standards and procedures that define the expectations of our employees' and contractors' behavior. Our [Code of Conduct](#) (2020) publicly sets out the high standards of conduct expected of all our employees, officers and directors, and by our partners, vendors and contractors when they are working with us or on our behalf. The Code explicitly refers to respecting the fundamental human rights of the people where we operate and those with whom we work. The policies formally approved by our internal governance process to date are listed below.

Our [Business Integrity Policy](#) (2020) establishes the basic tenets of how employees should conduct business -- with honesty, reporting accurately and without corruption.

Our [Sustainability & Stakeholder Engagement Policy](#) (2020) reflects Newmont's purpose to create value and improve lives through sustainable and responsible mining and our core sustainability values. This policy explicitly commits to implementing the UNGPs and the OECD Guidelines for Multinational Enterprises. The Policy also commits all employees and third-party workers at all Newmont sites to implementing the VPs through proactive engagement, training and working with governments in a transparent manner.

Our [Human Rights Standard](#) (2020) commits all our sites to implement the UNGPs and the VPs. As per the UNGPs, the corporate responsibility to respect human rights means that business enterprises should act with due diligence to avoid infringing on the rights of others and address adverse impacts with which they are involved. The Standard also requires sites to identify and evaluate actual and potential human rights risks and impacts including risks related to our relationships with security forces and governments.

The [Asset and Value Protection Policy](#) (2020) commits Newmont "to protecting and securing all Newmont personnel, assets, facilities and intellectual property" by carrying out "continuous threat and risk assessments, appropriate mitigation strategies and contingency plans in order to maintain the safety of Newmont personnel and assets."

Newmont Security Policies

Recognizing the inherent risks involved in protecting our personnel and assets in a way that respects human rights, we have developed a series of policies and procedures to clarify and define how to manage these risks.

Newmont's standards and procedures include minimum requirements for our security functions, that requires all sites ensure, "the conduct of Security Forces, involved or associated with securing Newmont's assets, facilities and personnel, is consistent with the Voluntary Principles on Security and Human Rights. This applies to Security Forces provided by Newmont, contractors and local governments (public security)." As well as adhering to other international legal norms such as the UN Code of Conduct for Law Enforcement Officials (1979), the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials (1990) and the Universal Declaration of Human Rights.

Promotion within Newmont

All employees with computer access are assigned online human rights training designed to raise awareness about Newmont's human rights commitments, potential risks and the importance of everyone working to prevent and address potential human rights impacts. In 2022, we revised and updated the human rights training module with new case studies, leadership messages and videos. Case study topics covered included key risk areas such as cultural heritage, artisanal and small-scale mining, as well as other security risks. The new training was rolled out in December 2022; and over 1,700 employees had completed the revised training by December 31st, with the training continuing into the first quarter of 2023.

Through the Supplier Risk Management Process, non-security suppliers identified as potentially high risk for human rights also receive a human rights training.

Promotion with Private Security Contractors

All contractors and suppliers are required to respect human rights as stated in the Newmont Supplier Code of Conduct. Private security contractors are required to comply with the VPs. Specific human rights clauses are also included which require suppliers to respect human rights in line with the Universal Declaration of Human Rights, report any human rights violations in their operations or conducted by their subcontractors or vendors, and cooperate with human rights audits if deemed necessary.

Promotion with Public Security

Newmont establishes a Memorandum of Understanding (MoU) with public security that provides additional security to our sites based on risk and feasibility. The MoU details the level of service provided and the expectations of legal conformance to national and international laws and regulations. The MoU, in most cases, also details the additional training on the VPs and human rights provided to the officers who are assigned to a Newmont site.

Newmont uses its influence and leverage where possible to promote the adherence to international humanitarian law by our host governments. In Peru and Ghana, we facilitate training and human rights workshops for government officials through third-party organizations. Please see Section (C) below for more detail on the relationship between public security and our Ghana operations.

Risk Assessments

Newmont recognizes that identifying our security and human rights risks is fundamental to understanding how the security function can respect human rights and prevent negative impacts at all our sites. In 2018, a review of our human rights issues identified the Right to Life and Right to Health as two of our salient issues and thus confirming the importance of our commitment to the VPs. In 2023, we will conduct a review and update the salient human rights issues for Newmont.

Newmont uses a Geopolitical Risk Program (GRP) to obtain qualitative and quantitative risk ratings and access near real-time global risk intelligence data through an external platform. The GRP has been integrated with Newmont's overarching risk management system to help support enterprise-level political risks being recorded in the risk and event reporting platform and critical controls being developed and monitored.

In our VPs risk assessment model, we assess the security and human rights risks to our sites and to our neighboring communities, including the risk that a private or public security guard uses undue force or violates humanitarian law. Newmont standards requires sites to conduct a security and human rights risk assessment for every new project and update it every three years. Most sites update their assessments annually or quarterly.

The most important security and human rights risks faced by Newmont are related to trespassing, artisanal and small-scale mining and community protests. We report on the issue of small-scale mining in our Annual Sustainability Report. (See Section (C) on Ahafo's efforts to mitigate the negative risks of small-scale mining on our property.)

Newmont occasionally commissions third-party assessments prior to a new project or exploration or to identify potential human rights and security risks. These assessments review issues such as:

- Local and national human rights contexts and dynamics (political, socio-economic, labor);
- Potential for conflict, violence, and equipment transfers;
- Local and national security capabilities and human rights records; and
- Governmental commitments to the rule of law, including the reliability, fairness and efficiency of the legal system.

In 2022, the following external assessments were conducted:

- Newmont commissioned assessments of VPHSR compliance for the Ahafo and Akyem mines in Ghana. These assessments also verified compliance with the UNICEF Checklist on Child Rights and Security. The sites will be working in 2023 on the opportunities identified in the assessment, such as improving the practical nature of the training and standardizing the private security contracts.
- 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.

Engagement with Security Forces

Reporting and Investigation of Security-related Human Rights Incidents or Grievances

Even with robust risk identification and mitigation controls, undesired events and incidents may occur. Newmont has several systems to report and investigate potential human rights incidents or complaints.

Employees and contractors can report allegations potentially involving human rights impacts to human resources or the Integrity Helpline, a confidential reporting channel managed by a third party accessible to employees and external stakeholders. Community stakeholders may use the local Newmont Voluntary Principles Plenary Report- 2022

community complaints and grievance mechanism to lodge any human rights related allegations or complaints. Our contracts with private security contractors and our MOU with public security also requires them to report to the Newmont Security function all security-related incidents with potential human rights implications.

As part of our continuous improvement efforts around effective community grievance mechanisms, Newmont set a target to develop a root-cause analysis methodology aimed at understanding the underlying drivers of complaints and grievances. Our goal was to learn from community grievances to reduce and eliminate repeat issues. In 2022, we initiated a pilot of the complaint-root-cause analysis at every operating site and look to carry the approach forward in 2023.

In 2022, the only sites which reported security-related human rights allegations were Akyem and Ahafo South. See Section (C) below for more information.

Contract Management with Private Security Providers

Newmont uses a Supplier Risk Management Process (SRiM) to manage the inherent human rights risks of contracting private security in the countries where we operate. Our Code of Conduct and Supplier Code of Conduct set the minimum expectations for our suppliers who want to contract with our Company. Our global Supplier Management Standard details the pre-qualification process to the final contracting and contract management process. Before contracting with Newmont, all private security providers must go through a pre-qualification process that includes a prohibited party, anti-bribery, and anti-corruption screening; financial health assessment; historical and current safety performance; and social, environmental, security and human rights past incidents and allegations screening.

Since private security contractors are considered high-risk providers, sites must also review a provider's background checks; training with respect to human rights, proper use of force, and weapons; affiliations with illegal activity; and any involvement in activities with negative human rights implications before executing a contract.

Ongoing contract management includes regular training on the VPs, human rights, and the rules of engagement (see Figure 1 for 2022 training statistics). In Mexico, the private security contractor has monthly key performance indicators linked to compliance with the VPs.

In 2022, third-party audits were conducted at our Ghana sites in Akyem and Ahafo South to determine site and contractor compliance with the VPs. See Section (C) for more details on the findings from this audit.

Figure 1 - VPs Annual Global Training Summary (Higher Risk Operating Sites)

Site	Number of sessions conducted	Total duration of all trainings (in hours)	Number of Personnel Trained				Percent of Newmont security trained
			Newmont security	Public security	Private security	Other External Stakeholders	
Accra [Ghana]	2	1.5	0	0	25	21 ¹	100%
Akyem [Ghana]	4	6	2	36	162	0	100%
Ahafo North [Ghana]	41	20	0	70	67	0	100%
Ahafo South [Ghana]	17	34	4	380	400	0	100%
Cerro Negro [Argentina]	3	3	7	0	124	0	100%
Merian [Suriname]	15	45	22	18	146	0	100%
Peñasquito [Mexico]	18	27	9	0	623	0	100%
Yanacocha [Peru]	23	23	4	770	533	0	100%

Figure 2 - VPSHR Annual Global Training Summary (North America and Legacy Site)

Site	Number of sessions conducted	Total duration of all trainings (in hours)	Number of Personnel Trained				Percent of Newmont security trained
			Newmont security	Public security	Private security	Other External Stakeholders	
CC&V [USA]	11	Online Self-Guided	9	0	2	0	100%
Éléonore [Canada]	16	6	2	0	12	0	100%
Marlin [Guatemala]	3	15	3	0	27	0	100%
Musselwhite [Canada]	Online Self-Guided	Online Self-Guided	1	0	7	0	100%
Porcupine [Canada]	2	2	2	0	34	0	100%
San Martin [Honduras]	2	6	0	0	15	0	100%

¹ Includes 21 trainees from high-risk suppliers.

(C) Country Implementation

For this year's report, we focus on the Ahafo South and Akyem mines in Ghana.

Ghana

The Newmont Ahafo mine is in the Brong Ahafo Region, composed of two major sites: Ahafo South, where Newmont has been mining since 2006, and Ahafo North, which is still under development. The scope of this report is for Ahafo South only. The Ahafo South mine directly employs approximately 1,177 people, 99 percent of whom are Ghanaian. It also engages about 3,639 contractors, 98 percent of whom are Ghanaian. Ahafo South was the first large-scale mine in the region. Prior to its start-up, the local economy was centered on small-scale subsistence agriculture. Ahafo employs four security professionals directly and 394 private security contractors, with 46 Ghanaian Police officers assigned to Newmont's operations.

The Akyem mine is located near New Abirem in the Eastern Region of Ghana. Akyem provides direct employment to 771 employees, all whom but one is Ghanaian. In addition, the operation engages approximately 664 contractors, 99 percent of whom are Ghanaian. Akyem employs two security professionals directly and 162 private security contractors. There were approximately eight Ghanaian police officers assigned to the site in 2022.

Ghana has ratified most of the international human rights covenants and conventions that help protect security-related human rights, including: the International Covenant on Civil and Political Rights, Convention on the Elimination of all Forms of Discrimination Against Women, Convention Against Torture and other Cruel, Inhuman and Degrading Punishment, and Convention on the Rights of the Child (UN Treaty Body Database). However, in its 2021 report on Ghana, the US State Department found "credible reports of: arbitrary or unlawful killings by the government or its agents; cases of cruel, inhuman or degrading treatment or punishment by the government or on behalf of the government; harsh and life-threatening prison conditions; [and] arbitrary arrest or detention." The same report also noted that impunity of Ghanaian Police Services was a problem due to repeated allegations of corruption and bribery which were not addressed by investigations and complaints processes. Newmont recognizes that there is a risk of being associated with alleged human rights violations via its MoU with the Ghanaian police and has strongly promoted the implementation of the VPs with public security at a country and regional level.

Stakeholder engagement on VPs implementation: Newmont led the effort to have Ghana become a member of the VPs and participates actively in the VPs In-Country Working Group and the Mining Chamber's efforts to promote the VPs. The Working Group meets at least annually to discuss progress on the implementation of the VPs in Ghana and has led the development and provision of training for magistrates and the police.

At a regional level, Newmont promotes training for police and meets regularly with the District Security Council and the Regional Security Council to discuss the security situation in the region. Discussions include the challenges with artisanal and small-scale mining and identifying efforts that can be made to prevent conflict and protests.

Newmont sponsored a police training school as part of its efforts to promote community development and local employment in the Ahafo region. The school opened in February 2022 with 295 recruits, who received six months training prior to joining the police force.

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. At both sites, Newmont engages regularly to discuss the dangers of artisanal mining and trespassing onto the sites.

Engagement with private security: All contractors are required to follow the Supplier Risk Management process to apply and contract with Newmont (see above for details). Newmont's contract with our security provider in Ghana includes provisions requiring respect for human rights, compliance with the VPs and the Foreign Corrupt Practices Act. Private security guards at both sites are unarmed. Some guard posts, at Ahafo South, have access to batons and pepper spray. All guards receive training on the VPs, human rights, the rules of engagement and their post orders, which emphasize minimum force in line with international law enforcement principles.

In 2022, there were no human rights allegations or complaints lodged against private security guards at Akyem or Ahafo South.

In 2023, we will be placing the private security contract out for tender. During the selection of a new provider, as described above, we will thoroughly review relevant audit findings, the human rights record and ability to comply with the VPs for all security contractors considered.

Engagement with public security: Newmont Ghana has an agreement with the Ghana Police Service (GPS) valid from April 2022 to 2026. The MOU states that the police deployed to Akyem and Ahafo operations and surrounding communities are "to provide assistance to Newmont's management in the event of a breach of the laws of Ghana by any person." In addition to their role in serving the local communities, it also states, "police contingents are to assist with security operations in the protection of personnel, property and processes at Newmont's operations." Newmont provides room, board and transportation, but does not provide offensive or defensive equipment to the police patrolling onsite.

Newmont also continues to support training for regional police in the Brong Ahafo and Eastern Regions and meets with the District Security Council and the Regional Security Council to discuss the security situation, the challenges with ASM and what efforts can be made to avoid conflict and protest.

Newmont provides both induction training and a daily briefing to all police officials on the VPs, use of force and the rules of engagement when managing conflicts. The most recent training program was completed during October 2022. At Ahafo South, the risk of having police on site is managed by requiring all police to be accompanied by private guards who carry body cams while patrolling the site. At Akyem, Security personnel monitor police conduct on site through CCTV. Police are accompanied to their post by private security personnel.

There have been no credible complaints lodged about public security related to the Akyem mine site in 2022. However, in 2022, one complaint was lodged against police through the CHRAJ regarding excessive use of force and unlawful arrests at Ahafo South. Newmont is fully cooperating with the CHRAJ investigation.

Another incident occurred at Ahafo South in November 2022 when police allegedly shot and killed one person and injured three others at a petrol station near a Newmont employee housing settlement outside of the town of Kenyasi. At the time of the incident, the Ghanaian Police were operating independently and not under Newmont's direction. Since the incident, Newmont has cooperated fully with the Ghanaian police. In addition, Newmont has hired a third party to conduct an independent investigation into the events leading up to and after the shooting, but the results were not available

upon the publication of this report. Newmont continues to engage with local stakeholders, including traditional leaders, civil society and government to better understand and prevent future conflict.

Progress review on the implementation of the VPs: We review progress on the implementation of the VPs through our continual assessment of our risks, the effectiveness of controls in place, contract performance indicators, training plan and daily incident reporting. In 2022, we carried out a third-party VPs review of the Ahafo South and Akyem mines. This review confirmed that our sites are committed to the implementation of the VPs while also recommending several opportunities for improvement in the training curriculum for security contractors, engagement with public security onsite (especially regarding the rules of engagement and the procedures for the arrest of minors onsite), tracking of incidents and investigations, strengthening security guard screening processes and addressing community concerns to prevent conflict and unrest.

Artisanal small-scale mining: Our most significant security and human rights risk at Ahafo South involves the trespassing of artisanal small-scale miners (ASM) onto our property. Encounters with ASM pose a risk to the health, safety and security of our personnel and the artisanal miner. We strive to uphold the rule of law and protect our assets while also respecting the right to life and security of all people involved. Our security, social and external responsibility departments work closely together to implement our global ASM strategy, which includes security, performance, livelihood development and external engagement (with, for example, the government of Ghana). Our multi-pronged strategy aims to provide alternatives to ASM miners, while also deterring and preventing trespassing through community engagement, improved infrastructure and patrols. Ghanaian police posted onsite make arrests regularly to remove illegal miners from the site for their safety and to deter further trespassing.

Organizational resistance: At Akyem, our most significant security and human rights related risk is potential for violence and protest. Several community groups have staged multiple protests against the mine in 2021 and 2022 over legacy resettlement issues and employment. Akyem has been taking various steps to address these ongoing challenges and concerns raised by stakeholders, including contracting third-party reviews of project-affected peoples, and developing and revising various programs to assist vulnerable groups and youth. We commit to ongoing dialogue and resolution of these stakeholder concerns to prevent conflict escalation and unlawful protest.

(D) Lessons and Issues

Opportunities for 2023

In 2023, we will review the opportunities listed in the third-party audits of Ahafo South and Akyem and develop an action plan of the opportunities for improvement, which we anticipate may include:

- updating our training content to ensure it is practical and emphasizes the desired behaviors on the job;
- reviewing and, if necessary, clarifying the private security contracts to reflect the expectation for compliance with international human rights law and the VPs;
- reviewing our incident investigations to ensure that we are obtaining the necessary lessons learned to avoid repeat incidents.

Newmont has a strong commitment to remaining injury and fatality free. The Security function realizes that all responses to potential violent activity carry a risk of injury to all parties that cannot be completely mitigated, especially regarding criminal activity, such as theft, trespassing or unlawful

protest situations, where Security personnel are limited in how they can respond to violence. To reduce the risk of violence, we will continue to assess ways to leverage technology as the first responder supporting safer deployment.

In addition, we will continue efforts to work with the Ghanaian police to investigate all incidents involving the police under our MoU and continue to support that all officials, where necessary, are well trained on the rules of engagement and the use of force. Newmont will also continue to engage with local stakeholders, including traditional leaders, civil society and government representatives to understand community issues and concerns and work together to resolve issues before they turn into larger conflicts or unrest.

(E) Engaged Company Progress on Implementation

As described above, Newmont meets the requirements of the Roles and Responsibilities of VPs member companies by demonstrating its commitment to the VPs; participating in the VPI activities; conducting risk assessments; promoting transparency, dialogue and the rule of law; incorporating the VPs into our policies and procedures; and engaging with public and private security and internal and external stakeholders.

Since joining the VPs, Newmont has benefited from several of the tools the VPI has to offer. In 2023, we intend to study the VP training to adapt to our specific country contexts as part of the previously stated reviews.