

## **Introduction**

The purpose of this Assessment is to gather preliminary information related to local Anti-Corruption efforts, and to assess potential legal and regulatory risks in each location. Each Assessment worksheet (TAB) should be completed by the employee deemed the most knowledgeable in respect to each area. The worksheets should be disseminated directly by the Barrick in-house counsel assigned to oversee the assessment. When the worksheets are completed, they should be returned directly to the attorney who provided it. The attorney assigned to oversee the assessment should document the individuals who assisted in responding to the questions from each area. A copy of the completed Assessment should be maintained by the country Legal department, sent to the Office of the General Counsel (OGC) in Toronto, and posted on Sharepoint. The information provided in each worksheet will be assessed by the OGC, country in-house counsel, and potentially outside counsel, and may require additional follow up.

## **Privileged and Confidential**

This Assessment is directed by counsel, and is privileged and confidential. The information is being generated to assist in identifying legal risks, including and in respect to investigatory efforts. All information, documents, and reports generated pursuant to this Assessment are intended to be protected by privilege to the full extent allowed by applicable laws.

## **Focus of Review**

This template is comprised of 16 Anti-Corruption worksheets within the following areas. Each worksheet should be completed as accurately and completely as possible. Please direct any questions to the Legal department.

- 1.0 General Overview**
- 2.0 Community Relations**
- 3.0 Customs and Logistics**
- 4.0 Environment**
- 5.0 Exploration**
- 6.0 Finance and Accounting**
- 7.0 Government Relations**
- 8.0 Health and Safety**
- 9.0 Human Resources**
- 10.0 Immigration**
- 11.0 Concessions and Leases**
- 12.0 Lands**
- 13.0 Legal**
- 14.0 Mines-Operational Permits**
- 15.0 Procurement and Contracts**
- 16.0 Security**

## Anti-Corruption Self-Assessment Worksheet

### General Overview

<b>1.1</b>	<b>Question: Changes in Activities</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>1.1.1</b>	<b>Do you anticipate any significant change in business activities over the next two years?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
1.1.2	Do you anticipate needing any major licenses/permits in the next two years?					
1.1.3	Do you anticipate any major capital investments in the next two years?					
1.1.4	Do you expect any major changes in volume of import or exports in the next two years?					
1.1.5	Do you expect any major change in the volume of personnel in/out of the country in the next two years?					
1.1.6	Do you anticipate any major disputes/litigation in the next two years?					
<b>1.2</b>	<b>Question: Concerns</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>1.2.1</b>	<b>Do you have any specific anti-corruption concerns?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
1.2.2	Do you believe there are corruption vulnerabilities in your department?					
1.2.3	Are there any personnel of particular concern (including any in discretionary positions) in terms of ethics?					
1.2.4	Are there any departments of concern in terms of ethics (yours or any other)?					
1.2.5	Have any problems been identified in the past with respect to corruption or fraud?					
1.2.6	Have any past transactions been troubling to you from a corruption standpoint?					
1.2.7	Are there any audit reports that are troubling to you from a corruption standpoint?					
1.2.8	Are there currently any process improvements underway with respect to anti-corruption or fraud?					
1.2.9	Are there any significant disputes (including pending) or concerns (including threats of regulatory sanctions) with the government?					
1.2.10	Are there any legal requirements that are very difficult to comply with?					

1.2.11	Are there any legal requirements you have to comply with that are very vague or tend to shift around in how they are enforced?					
1.2.12	Are there areas of frequent inspections from government?					
1.2.13	Are there frequent delays in getting government services (e.g., concerns about extortion)? (if so, note how harmful the delays are in the explanation column)					
1.2.14	Are there requests from government officials to employ relatives/friends?					
1.2.15	Are there requests from officials to hire particular third parties?					
1.2.16	Are there requests for kickbacks, gratuities, or other questionable payments from government officials?					
1.2.17	Are you aware of any improper payments made to any official?					
<b>1.3</b>	<b>Question: Policies</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>1.3.1</b>	<b>Do you have any concerns regarding your department's compliance with anti-corruption policies?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
1.3.2	Are there any anti-corruption policies or procedures that apply to your work?					
1.3.3	Do you feel the policies are followed adequately?					
1.3.4	Do reporting channels exist for the ethics or corruption concerns?					
1.3.5	Are investigations into ethical issues ever conducted?					
1.3.6	Are you aware of any reports on ethics issues not investigated?					
1.3.7	Are you aware of any past violations of fraud/corruption/ethics?					
<b>1.4</b>	<b>Question: Training &amp; Tone</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>1.4.1</b>	<b>Do you have any concerns regarding anti-corruption training?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
1.4.2	Have you received training on the anti-corruption policies?					
1.4.3	Was the training live?					
1.4.4	Have you received training in the past 12 months?					
1.4.5	Does management (at all levels) emphasize ethical behavior?					

1.4.6	Does management emphasize compliance with company policies?					
1.4.7	Does management emphasize the importance of understanding legal and regulatory obligations, and take a zero tolerance approach to failing to following legal obligation?					
1.4.8	Does your supervisor emphasize the importance of ethical practice and compliance with company policies?					
<b>1.5</b>	<b>Question: Overview of Government Interaction</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>1.5.1</b>	<b>Do you have any concerns regarding your Department's interaction with the government?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
1.5.2	Does your department interact with local government?					
1.5.3	Does your department interact with provincial government?					
1.5.4	Does your department interact with national government?					
1.5.5	Does your department interact with native tribes or chiefs?					
1.5.6	Does your department interact with foreign governments?					
1.5.7	Does your department interact with the legislative branch of government?					
1.5.8	Does your department interact with the executive branch of government?					
1.5.9	Does your department interact with the judicial branch of government?					
1.5.10	Does your department interact with entities owned or controlled by the state?					
1.5.11	Does your department interact with any government officials on a regular basis whose ethics you question?					
<b>1.6</b>	<b>Question: Government Support</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>1.6.1</b>	<b>Do you have any concerns regarding your department's providing of support to government entities?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
1.6.2	Does your department provide any of the following forms of support to government entities or officials:					
1.6.3	-- Recurring government support by agreement (e.g., lodging, meals, office space, stipend for administrative costs, etc.)					

1.6.4	-- Per diems, allowances, meeting attendance fees					
1.6.5	-- Donations (to government, charity, or community organization), cash or in-kind					
1.6.6	-- Travel (including use of any company or commercial aircraft, travel expenses) (if yes, note in explanation whether it is directly booked or reimbursed, or both)					
1.6.7	-- Gifts, meals, entertainment					
1.6.8	-- Scholarships					
1.6.9	-- Sponsorship of conferences					
1.6.10	-- Political contributions					
1.6.11	-- Facilitating payments					
<b>1.7</b>	<b>Question: Permits/Licenses</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>1.7.1</b>	<b>Do you have any anti-corruption concerns regarding your department's permits/licenses with the government?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
1.7.2	Does your area require any government licenses and permits (e.g., water, electricity, blasting, communications, exploration)?					
1.7.3	Are licenses renewed frequently? (e.g. annually)					
1.7.4	Are there any third parties involved in the renewal process?					
1.7.5	Is there a formal process established by the government to obtain licenses and permits?					
1.7.6	Are any licenses or permits ever discretionary for government officials, either as to their being granted or their terms?					
1.7.7	Are any payments required for the licenses/permits?					
1.7.8	Is a government authority responsible for calculating the payment due related to permits or licenses, and are those rates published?					
1.7.9	Does the payment process internally correspond to Barrick's finance and accounting policies?					
1.7.10	Are licenses or permits ever paid for in cash?					
<b>1.8</b>	<b>Question: Contracts &amp; Third Parties (for non-contracts/supply chain personnel)</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>1.8.1</b>	<b>Do you have any anti-corruption concerns regarding your department's contracts with third parties?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
1.8.2	Are any of the third parties used by your department owned or controlled by the government?					

1.8.3	Do any of the third parties used by your department have government officials among the owners?					
1.8.4	Do any of the third parties interact with the government on behalf of Barrick or your department?					
1.8.5	Were any of the third parties used by your department recommended by the government or a government official?					
1.8.6	Are the procurement policies for selecting, contracting with, or dealing with third parties followed? (e.g., vendors, contractors, agents, consultants)					
1.8.7	Do you have any concerns regarding the policies and procedures for sole sourcing, competitive bidding, tenders, and local procurement (e.g., whether they are being followed)?					
1.8.8	Do you believe the procurement policies ensure that the best qualified vendor for the best price is used?					
1.8.9	If a potential high risk vendor is identified (e.g., intermediary), is the matter referred to legal for further diligence and potential controls?					
1.8.10	Is the policy on retaining due diligence records properly followed?					
1.8.11	Have any third parties been hired that you think should not have been, for ethics reasons?					
1.8.12	Have you had any ethics concerns or problems with any third parties?					
1.8.13	For local procurement decisions, are the Vendor Onboarding Standards followed, including verification that there are no immediate government contacts (e.g., not owned by government or government officials, related to government officials, referred by government officials)?					
1.8.14	Does your department require written contracts or POs with all third parties?					
1.8.15	Are any ethics procedures/policies distributed to third parties?					
1.8.16	Do third parties have to sign periodic ethic/anti-bribery pledges?					
1.8.17	Are third parties given hotline or whistleblower information?					
1.8.18	Is there any training of third parties on ethics/anti-corruption?					

1.8.19	Do you have any concerns regarding third party selection, contracting or monitoring, from an ethics standpoint?					
1.8.20	Has the government ever insisted on honoring contractors with a local supplier?					
1.8.21	If so, did the government own these contractors or was the contractor closely connected to the government?					
<b>1.90</b>	<b>Question: Third Party Payments</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>1.9.1</b>	<b>Do you have any anti-corruption concerns regarding third party payments?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
1.9.2	Are finance and accounting policies and procedures with respect to approval, processing and documentation of payments to third parties followed?					
1.9.3	Are there controls in place to ensure that appropriate fees are charged/paid?					
1.9.4	Have there ever been charges that have concerned you/were unrecognizable in invoices of third parties dealing with government?					
<b>1.10</b>	<b>Question: Gov't Reviews, Disputes (Audits, Assessments/Penalties, Disputes/Prosecutions)</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>1.10.1</b>	<b>Do you have any anti-corruption concerns regarding audits by the government of your department?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
1.10.2	Does the government perform any audits or inspections related to your area?					
1.10.3	Are there policies/procedures regarding handling inspection/audit notice or arrival of government inspection/audit team?					
1.10.4	Have all government audits and inspections passed within the past 12 months?					
1.10.5	Are there any current controversies or disputes regarding a government audit or inspection?					
1.10.6	If the company disagrees with the outcome of a government audit or inspection, are additional steps taken to resolve the issue?					

1.10.7	In the case of a dispute regarding a government audit or inspection, is legal involved?					
1.10.8	Are there ever negotiations regarding government audits/inspections?					
1.10.9	Are there ever requests from officials for payments to "make the problem go away?"					
1.10.10	Is there litigation on external or government audit/inspection results?					
1.10.11	Do you monitor third parties who handle disputes with authorities?					
1.10.12	Do you have any ethical concerns about the third parties who handle disputes with authorities?					
<b>1.11</b>	<b>Question: Regulatory Compliance</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>1.11.1</b>	<b>Do you have any anti-corruption concerns regarding compliance with laws and regulations?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
1.11.2	Does the government monitor the company's compliance with applicable laws, regulations and standards relevant to your area?					
1.11.3	Does the company have to submit required reports to the government in your area?					
1.11.4	Are there periodic inspections by the government in your area?					
1.11.5	Is there a process in place that is followed in that government inspection and reporting? (e.g., filing processes, relevant laws/regulations, etc.)					
1.11.6	Are any third parties involved in the interaction with government in the inspection and reporting process?					
<b>1.12</b>	<b>Question: Other Government Compensation</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>1.12.1</b>	<b>Do you have any anti-corruption concerns regarding other payments to the government related to your area?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
1.12.2	Does the company make any other payments to the government related to your area (describe in explanation)?					
1.12.3	Is there an approval process related to government payments?					
1.12.4	Is the government authority responsible for calculating the payment due?					
1.12.5	Are fees beyond the official or gazetted rates ever paid?					
1.12.6	Are any third parties involved in the interaction?					



**Anti-Corruption Self-Assessment Worksheet**  
**Community Relations**

2.1	Community Relations	Yes	No	F/A	N/A	Explanation
2.1.1	<b>Do you have any concerns about any community support/outreach or programs the Department has participated in or currently participating in from a fraud or corruption standpoint?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
2.1.2	Do government officials or their relatives ever suggest community programs?					
2.1.3	Are government agencies/officials involved with program implementation?					
2.1.4	Does the Department have procedures in place to verify the program resources are used for their intended purpose?					
2.1.5	Are there government tax credits or other incentives for community programs?					
2.1.6	Are any government approvals required for community programs?					
2.1.7	Do government agencies/officials ever become involved in disputes between the community and the Company?					
2.1.8	Are government agencies/officials paid for their involvement in disputes between the community and the company?					
2.1.9	Does the approval process of payment follow the Anti-Corruption Procedure?					
2.2	Community Projects	Yes	No	F/A	N/A	Explanation
2.2.1	<b>Do you have any specific concerns about any community projects the Department has participated in or currently participating in from a fraud or corruption standpoint?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
2.2.2	Have government officials or their relatives ever suggest community projects?					
2.2.3	Does the company implement or build any projects?					
2.2.4	If 'yes', then is money provided to third parties or goods/services provided in kind?					
2.2.5	If 'yes' to third parties, then does the government ever select the third parties?					
2.2.6	If 'yes', then does the payment go directly to the third parties?					
2.2.7	(If applicable) is the third party a government owned or controlled contractor?					
2.2.8	Are there processes in place to control the payments (e.g., monitoring progress on projects; ensuring no over-invoicing)?					
2.2.9	Are there government tax credits or other incentives for community projects?					
2.2.10	Are any government approvals required for community projects?					

2.3	Community Donations and Charitable Contributions	Yes	No	F/A	N/A	Explanation
2.3.1	<b>Do you have any specific concerns about any community donations or charitable contributions the Department has made from a fraud or corruption standpoint?</b>					
	<b>Indicators</b>	Yes	No	F/A	N/A	Explanation
2.3.2	Does the government ever request community donations or charitable contributions?					
2.3.3	Have donations been made in cash rather than by check or wire?					
2.3.4	Are there government tax credits or other incentives for community donations or charitable contributions?					
2.3.5	Are any government approvals required for any kind of community donations or charitable contributions?					
2.3.6	Are there ever donations to charities owned by or affiliated with the government or a government official (or a close relative of an official)?					
2.3.7	If yes to any of 2.3.4-2.3.6, is the Anti-Corruption Procedure followed in relation to those donations or contributions?					
2.3.8	If yes to any of 2.3.4-2.3.6, is due diligence conducted on the recipient?					
2.3.9	If yes to any of 2.3.4-2.3.6, is the donation/contribution documented?					
2.3.10	If yes to any of 2.3.4-2.3.6, is the donation/contribution booked to the government-related contribution cost code?					
2.3.11	Are there ever donations to charities owned by or affiliated with the government or a government official (or a close relative of an official)?					

## Anti-Corruption Self-Assessment Worksheet

### Customs and Logistics

3.1	Import Processes	Yes	No	F/A	N/A	Explanation
3.1.1	<b>Do you have any anti-corruption concerns involving imports (e.g. licenses/permits, third party intermediaries acting on behalf of the company)?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
3.1.2	Are any third parties involved in the import process (e.g. customs clearance, freight forwarding)?					
3.1.3	Do any of the third parties have government owners/connections?					
3.1.4	Are any licenses required (e.g., bonded warehouse, import licenses for particular goods/equipment)?					
3.1.5	Are any third parties involved in the license/permit application process?					
3.1.6	If 'yes', are any of the third parties government owned or controlled?					
3.1.7	Are any of the third parties local companies?					
3.1.8	Are there policies and procedures around the licensing/permit process?					
3.1.9	Are payments for import licenses/permits ever paid in cash?					
3.1.10	Do the permits need to be renewed?					
3.1.11	Are there any discretionary decisions by government officials related to imports?					
3.2	Import Clearance	Yes	No	F/A	N/A	Explanation
3.2.1	<b>Do you have any anti-corruption concerns involving getting imports cleared?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
3.2.2	Are import clearance payments made through a third party?					
3.2.3	Are invoices regarding import clearance reviewed to ensure correct amount has been paid?					
3.2.4	Are audits conducted to assess whether payments are accurate and consistent with contractual terms and/or gazetted amounts?					
3.2.5	Have there been charges of concern or unrecognized entries in third party invoices regarding imports (if applicable)?					
3.2.6	Are there ever fees paid that are not formally gazetted regarding imports?					
3.2.7	Are there challenges in the import process, including in relation to fees?					
3.2.8	Are there difficulties with complying with laws, regulations or documentary requirements regarding imports?					
3.2.9	Are additional fees ever paid to expedite goods that are imported?					

3.2.10	Are there ever threats or delays from the government regarding getting imports cleared?					
3.2.11	Are there ever requests for facilitating payments regarding getting imports cleared?					
3.2.12	Are there ever requests for improper payments regarding getting imports cleared?					
3.2.13	Are there ever errors or disputes in the import process?					
3.2.14	Do you have any concerns regarding how challenges or errors are resolved, regarding imports?					
<b>3.3</b>	<b>Export Processes</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>3.3.1</b>	<b>Do you have any anti-corruption concerns involving exports (e.g. licenses, third party intermediaries acting on behalf of the company)?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
3.3.2	Are any third parties involved in the export process?					
3.3.3	Are there policies and procedures around the export licensing process?					
3.3.4	Are payments for export licenses ever paid in cash?					
3.3.5	Do the export permits need to be renewed?					
3.3.6	Are there any discretionary decisions by government officials related to exports?					
<b>3.4</b>	<b>Export Clearance</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>3.4.1</b>	<b>Do you have any anti-corruption concerns involving getting exports cleared?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
3.4.2	Are export clearance payments made through a third party?					
3.4.3	Are invoices reviewed to ensure correct amount has been paid regarding export clearance?					
3.4.4	Are audits conducted to assess whether payments are accurate and consistent with contractual terms and/or gazetted amounts?					
3.4.5	Are monies advanced as part of the import/export process?					
3.4.6	Have there been charges of concern or unrecognized entries in third party invoices regarding export clearance (if applicable)?					
3.4.7	Are there ever unofficial or non-gazetted fees paid regarding export clearance?					
3.4.8	Are there challenges in the export clearance process, including regarding fees?					
3.4.9	Are there difficulties with complying with laws, regulations or documentary requirements regarding export clearance?					
3.4.10	Are there ever threats or delays from the government regarding export clearance?					
3.4.11	Are there ever requests for facilitating payments regarding export clearance?					

3.4.12	Are there requests for improper payments regarding export clearance?					
3.4.13	Are there ever errors or disputes in the export clearance process?					
3.4.14	Do you have any concerns regarding how challenges or errors are resolved regarding export clearance?					
<b>3.5</b>	<b>Other Government Interactions</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>3.5.1</b>	<b>Do you have any anti-corruption concerns regarding any government interactions by your group?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
3.5.2	Are there any other government interactions within your group that have not been addressed above? (e.g., ports authority, police, etc.)					
3.5.3	Are there any particular concerns or challenges with respect to these interactions?					
3.5.4	Do government officials ever request payment to address these challenges?					

**Anti-Corruption Self-Assessment Worksheet  
Environment**

4.1	Permits	Yes	No	F/A	N/A	Explanation
4.1.1	<b>Do you have any anti-corruption concerns involving obtaining or renewing environmental permits?</b>					
	Indicators	Yes	No	F/A	N/A	Explanation
4.1.2	Have any major environmental permits been acquired, sought, or renewed in the last year?					
4.1.3	Have environmental permits ever been paid in cash?					
4.1.4	Are payments ever made to the government officials and not the government agency?					
4.1.5	Is the government authority responsible for calculating the permit payment due?					
4.1.6	Are the amounts published or gazetted for environmental permits?					
4.1.7	Are any fees paid beyond the official or gazetted rates for environmental permits?					
4.1.8	Are there challenges in the process of obtaining environmental permits?					
4.1.9	Are there any challenges in the process of determining the amounts for environmental permits?					
4.1.10	Are there any unjustified delays of environmental permits?					
4.1.11	Are there any denials of environmental permits?					
4.1.12	Are there any requests for payments to speed up the process or ensure approval of environmental permits?					
4.1.13	Do government officials make any discretionary decisions in the environmental permitting process?					
4.1.14	Are there ever requests by government officials to regularize or ignore permit violations?					
4.1.15	Are there ever requests for improper payments in the environmental permitting process?					
4.1.16	Is there a log or register that tracks the permits, what they require, when they are due for renewal?					
4.1.17	Have audits found there to be any exceedances or deviations from environmental permit requirements?					

**Anti-Corruption Self-Assessment Worksheet**  
**Exploration**

5.1	Exploration Permits	Yes	No	F/A	N/A	Explanation
<b>5.1.1</b>	<b>Do you have any anti-corruption concerns over obtaining exploration permits?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
5.1.2	Are land permits required in the country? (e.g. exploration and mining licenses, etc.)					
5.1.3	Have the requisite permits been acquired, sought or renewed in the last year?					
5.1.4	Are any new major licenses or renewals currently required?					
5.1.5	Are any new major licenses or renewals upcoming?					
5.1.6	Is a government hearing required for obtaining land permits?					
5.1.7	Are payments made to a government body for land permits?					
5.1.8	Are payments ever made to the government officials and not the government agency for land permits?					
5.1.9	Is the government authority responsible for calculating the permit payment due for land permits?					
5.1.10	Are the amounts published or gazetted for land permits?					
5.1.11	Are any additional fees beyond the official or gazetted rates ever paid for land permits?					
5.1.12	Are there any challenges in the process for obtaining land permits?					
5.1.13	Are there any unjustified delays for obtaining land permits?					
5.1.14	Are there any denials of land permits?					
5.1.15	Are there any requests for payments to speed up the process or ensure approval of land permits?					
5.1.16	Are there any other concerns regarding the process for obtaining land permits? (if yes, identify in explanation column)					
5.2	Other Government Interactions	Yes	No	F/A	N/A	Explanation
<b>5.2.1</b>	<b>Do you have any anti-corruption concerns over government interactions by your group?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
5.2.2	Do you ever make payments to customs or logistics government agencies ?					
5.2.3	Do you ever make payments to environmental government agencies ?					
5.2.4	Do you ever make payments to health and safety government agencies ?					
5.2.5	Do you ever make payments to immigration government agencies ?					
5.2.6	Do you ever make payments to operational license permits (e.g. blasting, communications, vehicles, etc.) government agencies ?					
5.2.7	Do you ever make payments to security government agencies ?					
5.2.8	Do you ever make payments to any other government agencies? (if yes, identify in explanation column)					
5.2.9	Does the company make any other payments to the government related to your function? if yes, identify in explanation column)					
5.2.10	If yes to 5.2.9, is the government authority responsible for calculating the permit payment due?					
5.2.11	If yes to 5.2.9, are the amounts published or gazetted?					
5.2.12	If yes to 5.2.9, are fees beyond the official or gazetted rates ever paid?					
5.2.13	If yes to 5.2.9, are any third parties involved in the interaction?					
5.2.14	If yes to 5.2.13, are any of the third parties government owned or controlled?					

**Anti-Corruption Self-Assessment Worksheet**  
**Finance and Accounting**

6.1 General Perception		Yes	No	F/A	N/A	Explanation
<b>6.1.1</b>	<b>Do you have any specific anti-corruption concerns as it relates to your department?</b>					
<b>Indicators</b>		<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
6.1.2	Are there any systems or processes that are targeted for further improvement?					
6.1.3	Are there any vulnerabilities in in the financial controls from your perspective?					
6.1.4	Are there particular times of the year or month that are more challenging for your position?					
6.1.5	Do you feel that you have adequate staffing and resources at your disposal to do your job?					
6.1.6	Are there any personnel or departments of particular concern from your standpoint? (e.g., by submitting incomplete or inaccurate documentation, failing to pay back their advances, circumventing controls)					
6.1.7	Are you ever pressured to approve payments quickly?					
6.1.8	If 'yes', then is it from certain groups?					
6.1.9	(If applicable) Does the pressure arise when you believe there's a problem or if something is not right about the back-up documentation?					
6.1.10	Do you have any concerns about third parties who perform services for the company?					
6.1.11	Do you know of any third party having a reputation for bribery?					
6.1.12	Do you know of any third party with a history of submitting false or misleading documentation?					
6.1.13	Do you know of any third party requiring payment in cash or to offshore accounts?					
6.1.14	Do you know of any third party who are controlled by government officials or their close associates?					
6.1.15	Do you have any concerns over the cash payment function?					
6.1.16	Do you have any concerns over the expense reimbursement function?					
6.1.17	Do you have any concerns over the third party payment function?					
6.1.18	Do you have any concerns over any other finance functions?					
6.1.19	Do have a high-level degree of confidence in the finance personnel?					
6.1.20	Is the finance function regularly audited by Internal Audit? (e.g. at least every two years)					
6.1.21	Do you receive copies of the final audit reports?					
6.1.22	Do you have any concerns about the results of the most recent reports?					
6.1.23	Have all audit recommendations been addressed or are currently being addressed?					
6.1.24	Do you have any concerns with any government agencies in relation to the company?					
6.1.25	If 'yes', are the reasons for your concerns because of vague or shifting tax, royalty or other requirements?					
6.1.26	Are the reasons for your concerns because of difficulties with compliance?					
6.1.27	Are the reasons for your concerns because of threats of regulatory sanctions?					
6.1.28	Are the reasons for your concerns because of harassment &/or frequent delays (e.g. to extort payment)?					
6.1.29	Are the reasons for your concerns because of the agency's reputation for bribery?					
6.1.30	Are the reasons for your concerns because of requests for kickbacks, gratuities, or other questionable payments?					



6.1.31	Are the reasons for your concerns because of other reasons?					
6.1.32	Are you aware of any problems with past transactions, from an anti-corruption standpoint (e.g. transactions recorded in a manner that masks payments to the government)?					
6.1.33	Are there concerns regarding payments made without authorized approvals? (e.g., by unauthorized persons or in amounts beyond authorized limits)					
6.1.34	If so, is there a pattern in terms of personnel/departments involved?					
6.1.35	If 'yes' then has a cause been identified?					
6.1.36	If applicable, have the issues been addressed?					
6.1.37	Are payment requests/backup documents maintained centrally?					
6.1.38	Are payment requests/backup documents maintained with the requesting department?					
6.1.39	Are payment requests/backup documents filed manually?					
6.1.40	Are payment records readily accessible?					
6.1.41	Do you have any recommendations for improvement?					
<b>6.2</b>	<b>Finance Department's Gatekeeper Role</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>6.2.1</b>	<b>Do you have any specific anti-corruption concerns as it relates to the disbursement of money?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
6.2.2	Do you have any concerns around the AFE process?					
6.2.3	Do you have any concerns around emergency payments? (e.g., "urgent" requests for payment, unusual or unexpected high-level management interest or involvement in processing payments, etc.)					
6.2.4	Does the finance department check to ensure that authorized and required signatures are present?					
6.2.5	Does the finance department check to ensure that segregation of duties is observed?					
6.2.6	Does the finance department check to ensure that the math adds up?					
6.2.7	Does the finance department check to ensure that required backup documents are attached and consistent with the request?					
6.2.8	Does the finance department check to ensure that backup documents are accurate, complete, and free of suspicious notations or other indicia of inauthenticity?					
6.2.9	Does the finance department check to ensure that rates for government services (visas, work permits, etc.) are consistent with official government rates?					
6.2.10	Does the finance department check to ensure that third parties aren't paid without delivering contracted-for goods/services and are not overpaid or double paid?					
6.2.11	Does the finance department check to ensure that there are no additional, unofficial payments handled by third parties?					
6.2.12	Does the finance department check to ensure that other indicators of suspicious payments are understood, whether related to the invoice characteristics; third-party relationships and activities; amount, currency, location or recipient of payment or other payment instructions; variances from					
6.2.13	Does the finance department check to ensure that government bank accounts and payees are correct or legitimate?					
6.2.14	Are payments to governments coded to clearly indicate the purpose?					
6.2.15	Do functional units determine the coding for payments?					

6.2.16	If so, then is training on coding of payments provided to the functional units?					
6.2.17	Does F&A book the transactions directly to the GL?					
6.2.18	Can the functional units book directly to the GL?					
6.2.19	Are there monitoring procedures in place to ensure ledgering is correct and appropriate?					
6.2.20	Does staff receive clear messaging regarding speaking up if they have concerns with payment requests?					
6.2.21	Is there a "reporting up" culture? (i.e., speaking up when concerns exist)					
6.2.22	Do you have any concerns regarding the use of cash?					
6.2.23	Is the use of cash to pay for goods and services prevalent in the country?					
6.2.24	Is the banking system readily available and reliable in the country?					
6.2.25	Is there any group/personnel that is always trying to get cash?					
6.2.26	If so, do you have any concerns about this?					
6.2.27	Are petty cash procedures followed closely?					
6.2.28	Are there any concerns about abuses or violations of the procedure?					
6.2.29	Are there any departments or employees who regularly fail to submit complete or accurate request forms for cash?					
6.2.30	Are there any departments or employees who regularly fail to acquit advances?					
6.2.31	Does the department remove from the employee's salary/wages any amount not acquitted in a particular period?					
6.2.32	Are there any departments or employees who regularly fail to submit documents to support the use of cash?					
6.2.33	Are there any departments or employees who regularly use cash for unauthorized purposes (e.g. personal gain, gain of government officials)?					
6.2.34	Has disciplinary action ever been taken for failure to follow procedures regarding cash?					
6.2.35	Are there any finance department personnel who do not observe required petty cash procedures around checking for required signatures?					
6.2.36	Are there any finance department personnel who do not observe required petty cash procedures around completing all required information on petty cash vouchers?					
6.2.37	Are there any finance department personnel who do not observe required petty cash procedures around issuing cash to employees with outstanding advances?					
6.2.38	Are there any finance department personnel who do not observe required segregation of duties for handling petty cash?					
6.2.39	Are there any finance department personnel who do not observe required petty cash procedures around performing physical verification of cash and cash reconciliations (e.g. cash on hand, petty cash GL reconciliations)?					
<b>6.3</b>	<b>Taxes</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>6.3.1</b>	<b>Do you have any specific anti-corruption concerns relating to the conduct of tax authorities?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
6.3.2	Are there any issues around the clarity/ambiguity and administrability of taxes?					
6.3.3	Are there any concerns regarding the process for the payment of taxes (e.g. calculation of the tax amount, approval, payment)?					
6.3.4	Do tax authorities have a reputation for improper conduct?					
6.3.5	If the answer to the above is 'yes', are steps taken to minimize risks associated with improper conduct?					
6.3.6	Have tax authorities utilized or attempted to utilize their powers to extort money, services or favours from the Company?					
6.3.7	If the answer to the above is 'yes', have extortion attempts been reported internally?					
6.3.8	Are you aware of any irregularities with tax inspections?					

6.3.9	Are there ongoing disputes with the government in relation to the amount of taxes owed?					
6.3.10	Do negotiations occur with respect to resolving tax assessments/disputes?					
6.3.11	If the answer to the above is 'yes', are all negotiations documented and transparent?					
6.3.12	If the answer to 6.3.10 is 'yes', have improper requests been made during negotiations?					
6.3.13	If the answer to the above is 'yes', have improper requests been documented?					
6.3.14	If the answer to 6.3.12 is 'yes', have improper requests been reported internally?					
6.3.15	Are consultants engaged to support with tax matters?					
6.3.16	If the answer to the above is 'yes', do consultants interface directly with tax authorities?					
6.3.17	If the answer to 6.3.15 is 'yes', are you aware of any irregularities with respect to the Company's use of tax consultants?					
6.3.18	If the answer to 6.3.15 is 'yes', have consultants requested payment amounts that are disproportional to the services provided?					
6.3.19	If the answer to 6.3.15 is 'yes', is due diligence performed on all tax consultants in accordance with the Guidelines for Third Party Due Diligence and Controls?					
<b>6.4</b>	<b>Royalties</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>6.4.1</b>	<b>Do you have any specific anti-corruption concerns as it relates to payments to the government for royalties?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
6.4.2	Does the company have to pay any royalties to the government?					
6.4.3	If so, is there any pressure on the company to pay the government a larger stake or higher royalties?					
6.4.4	Are there any concerns regarding the process for the payment of royalties (e.g. calculation of the royalty amount, approval, payment)?					
6.4.5	Are there any disputes with the government in relation to the amount of royalties owed?					
<b>6.5</b>	<b>Government Interactions and Payments</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>6.5.1</b>	<b>Do you have any specific anti-corruption concerns as it relates to interactions with the government by your department personnel?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
6.5.2	Are there any other interactions between the finance department and the government?					
6.5.3	If so, are these interactions frequent (e.g. at least monthly)?					
6.5.4	Are payments made to the government during these interactions?					
6.5.5	Are these payments initiated by the Finance department or other departments?					
6.5.6	Is there a particular process that applies to payments to government entities or government officials?					
6.5.7	Are the payments ever made in cash?					
6.5.8	Are records maintained?					
6.5.9	Is the segregation of duties observed?					
6.5.10	Are there any concerns about requests for unofficial/improper non-gazetted payments?					

**Anti-Corruption Self-Assessment Worksheet**  
**Government Relations**

<b>7.1</b>	<b>Lobbying</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>7.1.1</b>	<b>Do you have any anti-corruption concerns about any lobbying efforts by the company?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
7.1.2	Does the company have issues on which it lobbies or have lobbied the government?					
7.1.3	Has the company lobbied the local government?					
7.1.4	Has the company lobbied the state/regional government?					
7.1.5	Has the company lobbied the national government?					
7.1.6	Are lobbyists/consultants/door openers ever used?					
7.1.7	Do government officials ever recommend that the Company use certain third parties to negotiate/resolve disputes or issues?					
7.1.8	If the answer to the above is 'yes', then are any recommendations considered?					
7.1.9	Are there ever requests from government officials for payments, favors, gratuities, etc. in exchange for ensuring a positive outcome?					
7.1.10	If the answer to the above is 'yes', then are any requests considered?					
7.1.11	Are there any recurring problems with the government bodies/officials?					

**Anti-Corruption Self-Assessment Worksheet**  
**Health and Safety**

8.1	Permits	Yes	No	F/A	N/A	Explanation
8.1.1	<b>Do you have any anti-corruption concerns involving obtaining or renewing health and safety permits?</b>					
	Indicators	Yes	No	F/A	N/A	Explanation
8.1.2	Are health and safety permits required for equipment?					
8.1.3	Are health and safety permits required for medical registrations?					
8.1.4	Are health and safety permits required for nuisance/danger of exploitation?					
8.1.5	Are health and safety permits required for protection of natural habitats?					
8.1.6	Are health and safety permits required for flora/fauna?					
8.1.7	Are health and safety permits required for climate/emissions?					
8.1.8	Are health and safety permits required for water?					
8.1.9	Are health and safety permits required for others not mentioned? (Please note the type.)					
8.1.10	Do any of those health and safety permits involve payments to the government?					
8.1.11	If the answer to 8.1.10 is 'yes,' have health and safety permits ever been paid in cash?					
8.1.12	If the answer to 8.1.10 is 'yes,' is the government authority responsible for calculating the permit payment due?					
8.1.13	If the answer to 8.1.10 is 'yes,' are the amounts published or gazetted?					
8.1.14	If the answer to 8.1.10 is 'yes,' are any fees paid beyond the official or gazette rates?					
8.1.15	If the answer to 8.1.10 is 'yes,' are payments ever made to the government officials and not the government agency?					
8.1.16	Have there ever been any requests for improper payments associated with health and safety permits?					
8.1.17	Do government officials make any discretionary decisions in connection with health and safety permits?					
8.1.18	Have government officials ever requested payments to regularize or ignore violations of health and safety permit requirements?					
8.1.19	Are there challenges in the process of obtaining health and safety permits?					

8.1.20	Are there any challenges in the process of obtaining health and safety permits?					
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## Anti-Corruption Self-Assessment Worksheet

### Human Resources

9.1	Recruiting and Hiring	Yes	No	F/A	N/A	Explanation
9.1.1	<b>Do you have any ethical concerns around recruiting and hiring?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
9.1.2	Are there any local laws/regulations regarding recruiting/local employment?					
9.1.3	Are candidates ever referred by government officials?					
9.1.4	If so, do the referrals occur in particular areas and relate to particular officials?					
9.1.5	Are the applicable policies/procedures regarding referrals from government officials properly followed?					
9.1.6	Is the process for vetting candidates properly followed?					
9.1.7	Is the company process for assessing whether potential employees are government officials properly followed?					
9.1.8	Are any third parties involved in the hiring process (e.g., in referring or vetting candidates)?					
9.1.9	If the answer to 9.1.8 is yes, are any of the third parties related to government officials?					
9.1.10	If the answer to 9.1.8 is yes, is due diligence done on those third parties?					
9.1.11	Do employment contracts require compliance with company policies/procedures on ethics/anti-corruption?					
9.2	<b>Question: Government Affiliations</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
9.2.1	<b>Are there any employees who are high risk PEPs?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
9.2.2	Are there employees who have positions as officials, directors or advisors to the government (e.g., on the board of a State-Owned Enterprise)? If 'yes', please identify individual and government body in explanation column.					
9.2.3	Are there any close family of employees employed in senior government positions? If 'yes', please identify individual and government body in explanation.					
9.2.4	(If applicable) does the employee/relative have any role or decision making authority with respect to Barrick business?					
9.2.5	(If applicable) is there a screen or other control to prevent the employee/relative from making decisions with respect to Barrick?					
9.3	<b>Training Requirements</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
9.3.1	<b>Do you have any anti-corruption around compliance with training regulations?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
9.3.2	Are there any local laws around training of employees?					
9.3.3	Are there any interactions with government officials in connection with training or regulation of training?					
9.3.4	Is there a training levy?					

9.3.5	If so, is the training levy levied by local government?					
9.3.6	Is the training levy levied by national government?					
9.3.7	Are approvals for payment of levies required by policy?					
9.3.8	Are payments of training levies every made in cash?					
<b>9.4</b>	<b>Labour Agreements</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>9.4.1</b>	<b>Do you have any anti-corruption concerns around labour agreements?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
9.4.2	Are labour agreements required by the government?					
9.4.3	Is the government involved in negotiating, witnessing, or enforcing labour agreements?					
9.4.4	Are any payments made to the government (e.g. per diems) related to labour agreements?					
9.4.5	Are payments to the government related to labour agreements ever made in cash?					
9.4.6	Are there any particular challenges?					
9.4.7	Are there requests from government officials for improper payments?					
9.4.8	Are there any other concerns?					
<b>9.5</b>	<b>Labour Disputes</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>9.5.1</b>	<b>Do you have any anti-corruption concerns around labour disputes?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
9.5.2	Is the government involved in mediating or adjudicating labour disputes?					
9.5.3	Are any payments made to the government related to labour disputes (e.g., filing fees, per diems, etc.)?					
9.5.4	Are payments to the government related to labour disputes ever made in cash?					
9.5.5	Are any third parties involved in the process?					
9.5.6	Are there any particular challenges?					
9.5.7	Are there requests from government officials for improper payments?					
9.5.8	Are there any other concerns?					
<b>9.6</b>	<b>Union Elections</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>9.6.1</b>	<b>Do you have any anti-corruption concerns around Unions and Union Elections?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
9.6.2	Is the government involved in union elections or collective bargaining negotiations?					
9.6.3	Are any payments made to the government (e.g., filing fees, per diems, etc.)?					
9.6.4	Are payments to the government related to unions ever made in cash?					
9.6.5	Are any third parties involved in the process?					
9.6.6	Are there any particular challenges?					
9.6.7	Are there requests from government officials for improper payments?					
9.6.8	Are there any other concerns?					
<b>9.7</b>	<b>Employee Benefits and Related Government Payments</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>9.7.1</b>	<b>Do you have any anti-corruption concerns around employee benefits and related government payments?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
9.7.2	Are there any interactions with the government (licenses, regulation, direct services, inspection, etc.) for medical services that are performed on site?					



9.7.3	Are there any government interactions (licenses, regulation, direct services, inspection, etc.) for state-owned insurance and worker's compensation?					
9.7.4	Are there any government interactions (licenses, regulation, direct services, inspection, etc.) for payroll taxes?					
9.7.5	Are there government interactions that have not been previously addressed? (identify in explanation)					

**Anti-Corruption Self-Assessment Worksheet**  
**Immigration**

10.1	Visas	Yes	No	F/A	N/A	Explanation
<b>10.1.1</b>	<b>Do you have any anti-corruption concerns involving obtaining or renewing visas?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
10.1.2	Are visitor visas required by the country?					
10.1.3	Are business visas required by the country?					
10.1.4	Are working resident visas required by the country?					
10.1.5	Are other types of visas required by the country? (please list in explanation)					
10.1.6	Is there an internal process in place for obtaining the visas?					
10.1.7	Are payments made to obtain visas?					
10.1.8	Is the government authority responsible for calculating the visa payment due?					
10.1.9	Are the amounts published or gazetted?					
10.1.10	Are fees beyond the official or gazetted rates ever paid?					
10.1.11	Is there an approval process for making payments related to visas?					
10.1.12	Are there any concerns regarding the process for the payment of visas?					
10.1.13	Have visas ever been paid for in cash?					
10.1.14	Are payments ever made to the government officials and not the government agency?					
10.1.15	Are any third parties involved in the process of obtaining visas?					
10.1.16	Have there been challenges or difficulties in obtaining visas?					
10.1.17	Have there been any unjustified delays in getting visas?					
10.1.18	Have there been any denials of visas?					
10.1.19	Have there been any unjustified threats regarding visas?					
10.1.20	Are there any other challenges or difficulties in getting visas (aside from delays, denials, threats)?					
10.1.21	If so, are these challenges frequent or repeated (e.g. each time a visa is processed, or most of the time)?					
10.1.22	Are there requests from the government officials for facilitating payments or other payments, related to visas?					
<b>10.2</b>	<b>Work Permits</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>10.2.1</b>	<b>Do you have any anti-corruption concerns over obtaining work permits?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
10.2.2	Are work permits required workers in this country?					
10.2.3	Are local/district authorities and officials involved in obtaining work permits?					
10.2.4	Are provincial authorities and officials involved in obtaining work permits?					
10.2.5	Are national authorities and officials involved in obtaining work permits?					
10.2.6	Are state owned enterprise authorities and officials involved in obtaining work permits?					

10.2.7	Are other authorities and officials involved in obtaining work permits?					
10.2.8	Is there a process in place for obtaining the work permits?					
10.2.9	Are payments made to obtain work permits?					
10.2.10	Is the government authority responsible for calculating the permit payment due?					
10.2.11	Are the amounts published or gazetted?					
10.2.12	Are fees beyond the official or gazetted rates ever paid?					
10.2.13	Is there an approval process for making payments related to work permits?					
10.2.14	Are there any concerns regarding the process for the payment of work permits?					
10.2.15	Have work permits ever been paid in cash?					
10.2.16	Are payments ever made to the government officials and not the government agency?					
10.2.17	Are any third parties involved in the process of obtaining work permits?					
10.2.18	Have there been any challenges or difficulties with the government in the process of obtaining work permits?					
10.2.19	Have there been any unjustified delays in obtaining work permits?					
10.2.20	Have there been any denials of work permits?					
10.2.21	Have there been any unjustified threats regarding work permits?					
10.2.22	Are there any other challenges or difficulties regarding work permits (aside from delays, denials, threats)?					
10.2.23	If so, are these challenges frequent or repeated (e.g. each time a permit is processed, or most of the time)?					
10.2.24	If the answer to 10.2.23 is 'yes', then are any recommendations considered?					
10.2.25	Are there requests from the government officials for facilitating payments or other payments regarding work permits?					

**Anti-Corruption Self-Assessment Worksheet  
Concessions and Leases**

11.1	Concessions and Leases	Yes	No	F/A	N/A	Explanation
<b>11.1.1</b>	<b>Do you have any anti-corruption concerns over how mine concessions or leases are obtained?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
11.1.2	Are mineral rights owned by the government?					
11.1.3	Are mineral rights owned by the community?					
11.1.4	Are mineral rights owned by other authorities or entities?					
11.1.5	Are land permits required in the country? (e.g. exploration and mining licenses, etc. )					
11.1.6	Have key land permits or mineral rights been acquired, sought or renewed in the last year?					
11.1.7	Are any new major licenses or renewals currently required?					
11.1.8	Are any new major licenses or renewals upcoming?					
11.1.9	Is a government hearing required for obtaining land permits?					
11.1.10	Are payments made to a government body for land permits?					
11.1.11	Are payments ever made to the government officials and not the government agency?					
11.1.12	Is the government authority responsible for calculating the lease amount due?					
11.1.13	Are the amounts ever paid in cash?					
11.1.14	Are any additional fees beyond the official or gazetted rates ever paid?					
11.1.15	Have there been any challenges in the process?					
11.1.16	Have there been any unjustified delays?					
11.1.17	Have there been any denials?					
11.1.18	Have there been any requests for payments to speed up process or ensure approval?					
11.1.19	If 'yes', have any payments been paid in cash?					
11.1.20	Are there any other concerns?					
11.2	Land Valuation Process	Yes	No	F/A	N/A	Explanation
<b>11.2.1</b>	<b>Do you have any anti-corruption concerns over the land valuation process?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
11.2.2	Does the government play any role in the valuation of land involving private owners?					
11.2.3	If 'yes', do government Valuers assess the value of land?					
11.2.4	If 'yes', does the company pay those Valuers?					
11.2.5	If 'yes', are the rates published?					
11.2.6	If 'yes', are payments ever in cash?					
11.2.7	Does the government play a facilitating role in land valuation or purchasing?					
11.2.8	Do government officials receive per diems or payments?					
11.2.9	If 'yes', are those amounts published?					
11.2.10	If 'yes', are those payments ever in cash?					

## Anti-Corruption Self-Assessment Worksheet

### Lands

12.1	Relocation Process and Payments	Yes	No	F/A	N/A	Explanation
12.1.1	<b>Do you have any anti-corruption concerns involving the relocation process and related payments?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
12.1.2	Does your site/do sites in your country engage in relocations?					
12.1.3	Are there payments associated with relocation?					
12.1.4	If so, are those payments ever made in cash?					
12.1.5	<b>Is the government involved in relocation or landowner compensation practices?</b> For example: <ul style="list-style-type: none"> <li>• determining amount of land, trees, wildlife subject to compensation;</li> <li>• witnessing negotiations and agreements;</li> <li>• witnessing payments;</li> <li>• adjudicating/mediating disputes regarding relocation, compensation or appointment of agents;</li> <li>• having officials as landowners; and</li> <li>• having officials appointed as payment agents for landowners.</li> </ul>					
12.1.6	If the answer to 12.1.5 is 'yes', do you have any concerns about kickback schemes or side deals between landowners and government officials?					
12.1.7	If the answer to 12.1.5 is 'yes', then are there any allowances given to government personnel?					
12.1.8	If the answer to 12.1.7 is 'yes', are the allowances determined pursuant to published government rates?					
12.1.9	If the answer to 12.1.7 is 'yes', are there MOUs or support agreements with the government?					
12.1.10	If the answer to 12.1.6 is 'yes', then does the government determine the payment amounts?					

**Anti-Corruption Self-Assessment Worksheet**  
**Legal**

13.1	Litigation	Yes	No	F/A	N/A	Explanation
13.1.1	<b>Do you have any anti-corruption concerns regarding ongoing litigation matters?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
13.1.2	Are there any "substantial" litigation matters -- e.g., with values in excess of \$5 million or which involves substantive issues of importance to the company (operationally, reputationally, etc.)?					
13.1.3	If the answer to the above is 'yes', do you have any specific concerns with any of these matters?					
13.1.4	Do any company personnel interact directly with government officials regarding these substantial litigation matters?					
13.1.5	Do any third parties interact directly with government officials on your behalf regarding these "substantial" litigation matters?					
13.1.6	Do you have any anti-corruption concerns with any "substantial" litigation matters?					
13.1.7	In regards to litigation generally: do you find certain government departments or judges more problematic to deal with?					
13.1.8	In regards to litigation generally: do you find any abuses of process by the government?					
13.1.9	In regards to litigation generally: do you find any corruption?					
13.1.10	In regards to litigation generally: do you find any other ethical or moral challenges?					
13.2	Corporate Filings	Yes	No	F/A	N/A	Explanation
13.2.1	<b>Do you have any anti-corruption concerns regarding corporate filings?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
13.2.2	Is the Company required to make corporate filings/registrations in the country?					
13.2.3	Are the Company's filings/registrations current?					
13.2.4	Are these registration renewed frequently (e.g. at least annually)?					
13.2.5	Is a government authority responsible for calculating the filings/registrations payment due?					
13.2.6	Are there policies and procedures concerning how payments are made regarding corporate filings?					
13.2.7	Is there an approval process for making payments related to corporate filings?					
13.3	Compliance Role	Yes	No	F/A	N/A	Explanation
13.3.1	<b>Do you have any specific concerns regarding your compliance role?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
13.3.2	Do you have adequate resources to address anticorruption compliance issues?					
13.3.3	Do you believe the anti-corruption program is effective in mitigating corruption risks?					

13.3.4	Do you feel adequately trained in anti-corruption issues to perform compliance tasks?					
13.3.5	Have any anti-corruption concerns been raised by company personnel?					
13.3.6	Do you track issues raised and their resolution?					
13.3.7	Do you feel that management sets a tone of compliance in your organization?					
13.3.8	Any personnel/departments of concern from an ethics, compliance, controls perspective?					
<b>13.4</b>	<b>Investigations</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>13.4.1</b>	<b>Do you have any anti-corruption concerns regarding internal or external investigations?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
13.4.2	Are you aware of any irregularities respecting internal investigations?					

**Anti-Corruption Self-Assessment Worksheet  
Mines-Operational Permits**

14.1	Explosives	Yes	No	F/A	N/A	Explanation
<b>14.1.1</b>	<b>Do you have any anti-corruption concerns surrounding obtaining explosives permits?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
14.1.2	Does your area require any government licenses or permits to use explosives?					
14.1.3	Are the licenses renewed annually (or more frequently)?					
14.1.4	Are there any third parties involved?					
14.1.5	Is there a process in place related to obtaining licenses and permits for explosives?					
14.1.6	Are there challenges or difficulties in this process?					
14.1.7	Are any payments required for the licenses/permits?					
14.1.8	Is a government authority responsible for calculating the payment due related to explosives permits?					
14.1.9	If 'yes', are the rates published?					
14.1.10	If 'yes', are the payments requested consistent with the published rates?					
14.1.11	If 'yes', are payments ever in cash?					
14.1.12	Are there any additional fees beyond official rates?					
14.1.13	Is there an approval process for making payments related to explosives?					
<b>14.2</b>	<b>Hazardous Materials and Chemicals</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>14.2.1</b>	<b>Do you have any anti-corruption concerns surrounding obtaining hazardous materials and chemicals permits?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
14.2.2	Does your area require any government licenses or permits to use hazardous materials or chemicals?					
14.2.3	Are the licenses renewed annually (or more frequently)?					
14.2.4	Are there any third parties involved in the license renewal process?					
14.2.5	Is there a process in place related to obtaining licenses and permits for hazardous materials and chemicals?					
14.2.6	Are there challenges or difficulties in this process?					
14.2.7	Are any payments required for the licenses/permits?					
14.2.8	Is a government authority responsible for calculating the payment due related to hazardous materials and chemicals permits?					
14.2.9	If 'yes', are the rates published?					
14.2.10	If 'yes', are the payments requested consistent with the published rates?					
14.2.11	If 'yes', are payments ever in cash?					
14.2.12	Are there any additional fees beyond official rates?					
14.2.13	Is there an approval process for making payments related to hazardous materials and chemicals?					
<b>14.3</b>	<b>Vehicle Registration and Permits</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>14.3.1</b>	<b>Do you have any anti-corruption concerns surrounding obtaining vehicle registration and permits?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
14.3.2	Does your area require any vehicle registrations or permits?					
14.3.3	Are the permits or registrations renewed annually (or more frequently)?					
14.3.4	Are there any third parties involved in the license renewal process?					



14.3.5	Is there a process in place related to obtaining vehicle registrations and permits?					
14.3.6	Are there challenges or difficulties in this process?					
14.3.7	Are any payments required for the registrations/permits?					
14.3.8	Is a government authority responsible for calculating the payment due related to vehicle registration and permits?					
14.3.9	If 'yes', are the rates published?					
14.3.10	If 'yes', are the payments requested consistent with the published rates?					
14.3.11	If 'yes', are payments ever in cash?					
14.3.12	Are there any additional fees beyond official rates?					
14.3.13	Is there an approval process for making payments related to vehicle registration and permits?					
<b>14.4</b>	<b>Communications Licenses and Permits</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>14.4.1</b>	<b>Do you have any anti-corruption concerns surrounding obtaining communication licenses and permits?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
14.4.2	Does your area require any government licenses and permits related to communications?					
14.4.3	Are the licenses renewed annually (or more frequently)?					
14.4.4	Are there any third parties involved in the renewal process?					
14.4.5	Is there a process in place related to obtaining communication licenses and permits?					
14.4.6	Are there challenges or difficulties in this process?					
14.4.7	Are any payments required for the licenses/permits?					
14.4.8	Is a government authority responsible for calculating the payment due related to communication licenses and permits?					
14.4.9	If 'yes', are the rates published?					
14.4.10	If 'yes', are the payments requested consistent with the published rates?					
14.4.11	If 'yes', are payments ever in cash?					
14.4.12	Are there any additional fees beyond official rates?					
14.4.13	Is there an approval process for making payments related to communication licenses and permits?					
<b>14.5</b>	<b>Other Licenses and Permits</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>14.5.1</b>	<b>Do you have any anti-corruption concerns regarding obtaining any other types of licenses and permits?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
14.5.2	Does your area require any other government licenses and permits? (if yes, list in explanation column)					
14.5.3	If the answer to the above question is 'yes', are the licenses and/or permits renewed annually (or more frequently)?					
14.5.4	Are there any third parties involved in the license renewal processes?					
14.5.5	Is there a process in place related to obtaining any other licenses or permits?					
14.5.6	Are there challenges in this process?					
14.5.7	Are any payments required for the licenses/permits?					
14.5.8	Is a government authority responsible for calculating the payment due related to any other licenses or permits?					
14.5.9	If 'yes', are the rates published?					
14.5.10	If 'yes', are the payments requested consistent with the published rates?					
14.5.11	If 'yes', are payments ever in cash?					
14.5.12	Are there any additional fees beyond official rates?					

14.5.13	Is there an approval process for making payments related to any other licenses and permits?					
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**Anti-Corruption Self-Assessment Worksheet  
Procurement and Contracts**

15.1 High Risk Vendors		Yes	No	F/A	N/A	Explanation
<b>15.1.1</b>	<b>Do you have any anti-corruption concerns regarding high risk third party selection and monitoring?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
15.1.2	Does your Department use any third parties who interact with the government on the Company's behalf, or which are owned or controlled by the government or government officials or their relatives, or which were referred by government officials (collectively, "high risk vendors")?					
15.1.3	Is the Barrick process followed for conducting due diligence and instituting controls for high risk vendors?					
15.1.4	Are there written contracts in place for high risk vendors that contain anti-corruption clauses?					
15.1.5	Is anti-corruption due diligence conducted for high risk vendors?					
15.1.6	Is there a policy on retaining records on due diligence for anti-corruption?					
15.1.7	Have any high risk vendors been hired that you think should not have been from an anti-corruption standpoint?					
15.1.8	Have you had any concerns or problems with high risk vendors from an anti-corruption standpoint?					
15.1.9	Do high risk vendors ever provide anti-corruption certifications?					
15.1.10	Do high risk vendors ever receive anti-corruption training?					
15.1.11	Do high risk vendors ever receive Barrick's anti-corruption policy?					
15.1.12	Is there monitoring of the activities of high risk third parties?					
15.1.13	Is the monitoring of the activities of high risk third parties documented?					
<b>15.2 Vendor Onboarding</b>						
<b>15.2.1</b>	<b>Do you have any anti-corruption concerns regarding general vendor onboarding?</b>					
	<b>Indicators</b>					
15.2.2	Has the vendor onboarding standard been implemented in your country/at your site?					
15.2.3	Is the vendor onboarding standard followed with all vendors?					
15.2.3	For all new and renewing third parties, have anti-corruption questionnaires been completed (either by the third party, the internal business owner, or both)?					
15.2.4	For all new and renewing third parties, is a WorldCheck search run (or does the third party register through Trac)?					
15.2.5	Have all third parties been provided with Barrick's hotline information?					
<b>15.3 Third Party Payment Oversight</b>		<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
<b>15.3.1</b>	<b>Do you have any anti-corruption concerns regarding the third party payment oversight?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
15.3.2	Are there policies and procedures with respect to approval, processing and documentation of payments to third parties engaged by end-user departments?					
15.3.3	Does your Department give any special attention or scrutiny to government payments?					

**Anti-Corruption Self-Assessment Worksheet**  
**Security**

16.1	Licenses/Permits	Yes	No	F/A	N/A	Explanation
16.1.1	<b>Do you have any anti-corruption concerns regarding licenses/permits related to the security function?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
16.1.2	Are any weapons permits required for the security function?					
16.1.3	Are detention permits required for the security function?					
16.1.4	Are any other types of permits required for the security function?					
16.2	In-Kind Security Support	Yes	No	F/A	N/A	Explanation
16.2.1	<b>Do you have any anti-corruption concerns regarding in-kind security support?</b>					
	<b>Indicators</b>	<b>Yes</b>	<b>No</b>	<b>F/A</b>	<b>N/A</b>	<b>Explanation</b>
16.2.2	Does the company provide support to any public security agencies?					
16.2.3	Are there MOUs in place that govern such support?					
16.2.4	Does the company provide support/assistance related to fuel or transport services?					
16.2.5	Does the company provide support/assistance related to lodging?					
16.2.6	Does the company provide support/assistance related to meals?					
16.2.7	Does the company provide support/assistance related to office space?					
16.2.8	Does the company provide support/assistance related to equipment?					
16.2.9	Does the company provide other support/assistance that is not captured above?(e.g., fuel, transport, lodging, meals, office space, equipment, etc.)					
16.2.10	Has the company specifically refused to provide support in any area?					
16.2.11	If so, are there policies/procedures regarding in-kind support?					
16.2.12	Is any of the in-kind support provided on a recurring basis (e.g. monthly)?					
16.2.13	Are there any concerns regarding whether the anti-corruption procedure is followed for in-kind support?					
16.3	Monetary Support	Yes	No	F/A	N/A	Explanation

16.3.1	Do you have any anti-corruption concerns related to monetary support for security services?					
Indicators		Yes	No	F/A	N/A	Explanation
16.3.2	Is any monetary or direct support provided to public security or individual officers?					
16.3.3	If the answer to the above is 'yes', is the payment on a recurring basis?					
16.3.4	If the answer to 16.3.2 is 'yes', is the payment pursuant to a rate published by the government?					
16.3.5	If the answer to 16.3.2 is 'yes', is monetary support provided frequently (e.g. at least monthly)?					
16.3.6	If the answer to 16.3.2 is 'yes', is monetary support ever provided in cash?					
16.3.8	If the answer to 16.3.2 is 'yes', are backup documents obtained related to the support? (describe the type of documentation in the explanation column)					
16.3.8	Are there any concerns regarding whether the anti-corruption procedure is followed for monetary support? (if yes, indicate why in the explanation column)					

## Anti-Corruption Self-Assessment Worksheet Government Ownership and Boards

17.1	Government Ownership
<b>17.1.1</b>	<b>Do you have any anti-corruption concerns regarding government ownership of the mine?</b>
<b>Indicators</b>	
17.1.2	Is the government an owner or partner in any Company businesses?
17.1.3	If the answer to the above is 'yes,' is the government's share greater than 20%?
17.1.4	Is the government's involvement active?
17.1.5	Do any written agreements govern the relationship?
17.1.6	Are payments made to the government partner?
17.1.7	If the answer to 13.3.6 is yes, is the amount paid to the government determined by written agreement?
17.1.8	If the answer to 13.3.6 is yes, is the amount paid to the government based upon regulation?
17.1.9	Are there policies and procedures concerning payments?
17.1.10	If the answer to 13.3.6 is yes, is there an approval process for making payments to the government partner?
17.1.11	If the answer to 13.3.6 is yes, are there any concerns regarding how funds paid to government are used (e.g., misappropriation by government officials)?
17.2	Government Boards
<b>17.2.1</b>	<b>Do you have any anti-corruption concerns regarding government board participation in relation to the mine?</b>
<b>Indicators</b>	
17.2.2	Are any government officials on the Company's board of directors?
17.2.3	Are any Company personnel also members of the board?
17.2.4	If meetings are held offsite, do government board members receive travel support?
17.2.5	If meetings are held offsite, do government board members receive allowances/ per diems?
17.2.6	If meetings are held offsite, do government board members receive meals?
17.2.7	If meetings are held offsite, do government board members receive gifts?
17.2.8	If meetings are held offsite, do government board members receive entertainment?

17.2.9	If meetings are held offsite, do government board members receive other support?
17.2.10	Do government board members engage in business with the Company through side-ventures?
17.2.11	Do government board members seek other benefits from the Company (e.g., personal donations, medical care, charitable




