



## Procedure for Implementing the Anti-Bribery and Anti-Corruption Policy

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**SCOPE:** This Procedure is applicable to every employee of Barrick Gold Corporation or its subsidiaries, including senior executive and financial officers, and to members of the Barrick Board of Directors. The Procedure is not applicable to Acacia Mining, which maintains its own anti-bribery and anti-corruption program, and may not be applicable at other locations in which Barrick holds a significant interest but does not exercise operational control.

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RELATED DOCUMENTS	
	Code of Business Conduct and Ethics
	Anti-Bribery and Anti-Corruption Policy
	Barrick Supplier Code of Ethics
	Global Vendor Onboarding Standard
	Global Employee Expense Standard
	Global Standard & Procedure for Invoice Processing and Payment
	Global Standard for Petty Cash
	Global Delegation of Authority Policy

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## 1. BACKGROUND AND PURPOSE

This Procedure implements the Anti-Bribery and Anti-Corruption Policy (“Policy”) of Barrick Gold Corporation (together with its subsidiaries, “Barrick” or the “Company”). In many circumstances, providing certain benefits to government officials and third parties may lead to investigations and prosecutions under the anti-bribery and anti-corruption laws that apply to Barrick and its employees.

This Procedure defines required processes in relation to relationships with, and payments to, government officials. It further defines contracts and agreements with governments, government officials, or third parties which must be reviewed and approved by the Legal Department prior to signing. Such relationships, payments, and agreements are:

- a) government-sponsored travel;
- b) direct government monetary support;
- c) in-kind government support;
- d) per diems for government officials;
- e) gifts and entertainment for government officials;
- f) charitable and cultural donations;
- g) political contributions;
- h) facilitating payments;
- i) contracts and agreements with government officials or state-owned entities;
- j) relationships with contractors or consultants referred by government officials; and
- k) relationships with any third parties that will represent Barrick before a government agency or official, or will interface with the government on Barrick’s behalf or for Barrick’s benefit.

This Procedure does not address typical payments to formal government agencies (e.g. taxes, royalties, licensing fees, etc.)

## 2. SCOPE

### 2.1 *Application*

This Procedure is applicable to every employee of Barrick, including senior executive and financial officers, and to members of the Barrick Board of Directors.

This Procedure only applies to relationships with governments and individual officials, and does not apply to private commercial relationships except as provided

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in section 1, paragraphs i) (contracts and agreements with government officials or state-owned entities), j) (relationships with third parties referred by a government official), and k) (third party intermediaries) above, and section 6.5.6 of this Procedure (donations to charities not affiliated with the government or government officials).

## **2.2 Knowledge of the Procedure**

All Barrick employees and third parties with whom Barrick or its affiliates contract must understand and comply with their obligations under relevant anti-bribery and anti-corruption laws and the Policy. In addition, the following Barrick personnel must have knowledge of this Procedure:

- All Country Executive Directors;
- All Country Head of Mine Site/Portfolio Operations, Head of Development Project and Head of Country or Regional Exploration;
- All members of Corporate, Site, or Country senior management teams;
- All Site, Country or Corporate In-House Legal Counsel;
- All Site, Country or Corporate members of finance and accounting;
- All Senior Ethics and Compliance Personnel;
- All Site, Country or Corporate members of Security, Government Affairs, Community Relations, Environment, Supply Chain, Safety and Health, Human Resources, and Exploration at the manager level or above; and
- All other Site, Country or Corporate employees who:
  - have authority to enter into or approve agreements with third parties;
  - within the scope of their employment interface with government officials at any level; or
  - provide, pay or approve benefits or any other things of value to government officials.

All Authorized Approval Employees, as defined below, are responsible for ensuring that they understand and comply with this Procedure.

## **3. RESPONSIBILITIES**

### **3.1 President**

The President shall (a) personally (or, in his or her discretion, delegated to the Chief Sustainability Officer) approve requests received from country management for charitable and cultural donations valued above USD \$100,000, and (b) personally (or through his or her designees) approve requests for all political contributions.

### **3.2 Chief Operating Officer and Chief Financial Officer**

Shall oversee compliance with this Procedure.

### **3.3 General Counsel / Head Country In-House Legal Counsel**

Shall oversee compliance with this Procedure.

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### **3.4 Country Executive Directors**

- a) Shall ensure that this Procedure is communicated and implemented in their country, as applicable.
- b) Shall ensure compliance with this Procedure in the country or business unit, as applicable.
- c) Shall approve requests received from functional managers for charitable and cultural donations valued above USD \$10,000.

### **3.5 Heads of Mines, Heads of Development Projects, Heads of Country or Regional Exploration**

- a) Shall ensure that this Procedure is communicated and implemented within their Site.
- b) Shall ensure compliance with this Procedure at the Site.

### **3.6 Other personnel not listed above, but who are involved in the making of payments or provision of support to government officials, or who enter into agreements with third parties that may have a government affiliation**

- a) Shall consult with Authorized Approval Employees prior to providing any of the support, or entering into agreements, as identified in this Procedure.

## **4. STATEMENT OF ZERO TOLERANCE**

As set forth in the Policy, Barrick does not tolerate violations of anti-bribery or anti-corruption laws by the Company, its employees or affiliates, or any third parties acting on its behalf. There are no exceptions to or permitted deviations from this requirement.

A failure to follow the terms of this Procedure may result in a refusal to authorize a request for support, or a refusal to reimburse an expense advanced by an employee or third party. Because this Procedure implements the Policy, a failure to follow the Procedure also may result in disciplinary action, which may include counseling, written warnings, focused training, or in certain cases, termination.

Violating anti-bribery laws can lead to profound consequences to the individuals involved, including criminal charges, prison terms and fines, and to Barrick, as acts of corruption might also result in government investigations, substantial fines, government monitoring, costly litigation and irreparable reputational damage.

## **5. DEFINITIONS**

### **5.1 Authorized Approval Employee**

For purposes of this Procedure, “Authorized Approval Employee” means the General Counsel, any Barrick Head Country In-House Legal Counsel, all Senior Ethics and Compliance Personnel, or any other employee of a Site, Country, or Corporate office so designated from time to time by the General Counsel. The list of Authorized Approval Employees will be announced and posted on Barrick’s Intranet, and updated periodically.

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## 5.2 **Government Official**

A government official is:

- any employee of a local, state, or federal government entity;
- any employee of a government owned or controlled enterprise;
- any appointed, elected, or honorary official;
- any employee of a public international organization (such as the United Nations or World Bank);
- tribal chiefs and other officers or representatives of first nation organizations or aboriginal communities, who have authority to exercise governmental powers; or
- an individual acting in an official capacity for, or on behalf of, a government, government owned entity, or public international organization;
- an immediate relative (specifically, a spouse/partner, parent or parent-in-law, child or son/daughter in-law, stepson or stepdaughter, aunt or uncle, niece or nephew, sibling or brother/sister in-law) of any of the persons listed above.

## 5.3 **Support Agreement**

For the purposes of this Procedure, a “Support Agreement” means a document, such as a negotiated memorandum of understanding, a countersigned letter or, if necessary, a unilateral letter from Barrick, outlining the nature and the conditions of the support that Barrick will provide to (i) a government or its officials, or (ii) in the case of charitable and cultural donations, a charity or organizers of a cultural event, and Barrick’s understandings and expectations with respect to such support. All Support Agreements must be reviewed by Head Country or Corporate In-House Legal Counsel before being provided to any third parties, including government officials. A sample Support Agreement is attached hereto as Appendix J.

## 5.4 **Facilitating Payment**

A “facilitating payment” is a non-officially regulated payment made to expedite an administrative act of a routine nature. Examples are: processing government papers (e.g., visas), scheduling inspections, providing phone, water, or power service, or other routine activities performed by a government official that do not involve discretionary action under the law but where the substantive outcome is already determined. Facilitating payments are prohibited in many countries, and can be difficult to distinguish from illegal payments. As such, they are prohibited by Barrick.

# 6. REQUIREMENTS

## 6.1 **Specific Requirements**

The specific requirements for complying with this Procedure are set forth in Section 6.5 below. The “Procedure Summary Chart” attached hereto as Appendix A sets out these requirements.

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## **6.2 Modification and Localization of Amounts**

Many of the areas covered by this Procedure contain monetary thresholds, that may be adjusted locally (e.g., by countries or sites). The local threshold should fulfill the purpose of this Procedure: to ensure that support and payments are being provided only for legitimate business purposes and not influencing officials to exercise their authority in a way inconsistent with the law, while at the same time being mindful of operational needs. In adjusting thresholds, approval is required by the Country Executive Director (in consultation with the Head Country In-House Legal Counsel), and the General Counsel.

## **6.3 Security Support**

At some Sites, Barrick provides certain support to the police and other public law enforcement. The provision of security support may implicate other local laws and/or international norms which may result in additional requirements beyond those set forth in this Procedure or the Policy. Before providing support to police and other public law enforcement officials, Head Country or Corporate In-House Legal Counsel must be consulted to ensure compliance with those potential additional requirements. In addition, in certain countries, specific agreements are already in place related to such types of support and those agreements may impose additional restrictions/processes beyond those set forth in this Procedure. In those instances, the terms of those agreements, and not this Procedure, should govern if there is a conflict.

## **6.4 Finance and Accounting**

This Procedure does not alter local or global delegations of authorities, or any finance and accounting policies, procedures or standards. As explained further below, this Procedure contemplates that support provided to government officials will (a) follow normal approval processes, and also (b) be reviewed solely for anti-corruption compliance by an Authorized Approval Employee. For the normal approval processes, global and local delegations of authority are not altered. The same is true for the Global Employee Expense Standard, the Global Standard & Procedure for Invoice Processing, and the Global Standard for Petty Cash, and other finance and accounting protocols. To be clear, these requirements are still applicable for the support covered by this Procedure.

## **6.5 Specific Areas Covered by this Procedure**

### **6.5.1 Business Travel and Incidentals**

Procedures for all Barrick sponsored business travel and incidentals provided to government officials are set forth in Appendix B.

### **6.5.2 Direct Monetary Government Support**

Procedures for provision of all direct monetary government support are set forth in Appendix C.

### **6.5.3 In-Kind Government Support**

Procedures for provision of all in-kind government support are set forth in Appendix D.

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#### **6.5.4 Per Diems for Government Officials**

Procedures for provision of all per diems for government officials are set forth in Appendix E.

#### **6.5.5 Meals, Gifts and Entertainment**

Procedures for provision of all meals, gifts and entertainment for government officials are set forth in Appendix F.

#### **6.5.6 Charitable and Cultural Donations**

Procedures for provision of all donations, contributions and cultural events are set forth in Appendix G.

#### **6.5.7 Political Contributions**

Procedures for provision of all political contributions to candidates, political parties, and political organizations are set forth in Appendix H.

#### **6.5.8 Support Agreements and Contracts with Third Parties**

Procedures for the signing of all Support Agreements as referenced in this document, or contracts with government-affiliated entities, are set forth in Appendix I. Government-affiliated entities include entities owned or controlled by the government, by government officials or their relatives, or referred by governments or government officials, or third parties who represent Barrick before a government, or interface with the government on Barrick's behalf or for Barrick's benefit. In addition, wherever possible, we should strive to have Support Agreements countersigned by an official, on behalf of the agency and with a higher rank than the official(s) receiving the support.

### **6.6 Facilitating Payments**

Barrick prohibits the payment of Facilitating Payments.

## **7. ATTACHMENTS**

- Appendix A: Procedure Summary Chart
- Appendix B: Business Travel and Incidentals for Government Officials
- Appendix C: Direct Monetary Government Support
- Appendix D: In-kind Government Support
- Appendix E: Per Diems for Government Officials
- Appendix F: Meals, Gifts and Entertainment for Government Officials
- Appendix G: Charitable and Cultural Donations
- Appendix H: Political Contributions
- Appendix I: Support Agreements with Government and Government-Affiliated Third Parties
- Appendix J: Sample Support Agreement



## APPENDIX A

### Procedure Summary Chart

Note: The approvals indicated below are intended to **be in addition to (and not in lieu of)** the existing local processes.

"✓" indicates that the review and approval of Authorized Approval Employee (AAE) and/or Support Agreement as applicable, is required.

Type	AAE Approval Required?	Support Agreement Required?	General and Specific Conditions
Business Travel for Government Officials			<ul style="list-style-type: none"> <li>Wherever possible, Barrick should purchase or arrange</li> <li>If <u>security related</u>, AAE approval and Support Agreement always required <u>regardless of amount</u></li> <li>AAE approval and Support Agreement (if required) must be obtained <u>in advance</u> of any expense incurred, unless otherwise noted</li> </ul>
Domestic Flight or Train Travel	✓		
International Flight	✓	✓	
Spouse/Partner/Family Travel	✓	✓	<ul style="list-style-type: none"> <li>Only for visits where spouse/partner/ family travel is customary and appropriate.</li> </ul>
Taxi	✓ (if above USD \$50 per fare/or limit set locally)		<ul style="list-style-type: none"> <li>AAE approval for taxi can be processed after the fact (except if security related) but always prior reimbursement or expense reports.</li> <li>Receipts preferred for all amounts, required for fares of USD \$25 or higher (or limit set locally).</li> </ul>
Rental Car	✓		<ul style="list-style-type: none"> <li>AAE approvals can be processed after the fact if Rental Car is for 3 days or less (except if security related) but always prior reimbursement or expense reports.</li> </ul>
Hotel and Incidentals	✓		<ul style="list-style-type: none"> <li>AAE approval for the following incidentals can be processed after the fact (except if security related) but always prior reimbursement or expense reports: meals, laundry, or use of business center for less than USD\$50 per person (or limit set locally).</li> </ul>
Direct Monetary Government Support			<ul style="list-style-type: none"> <li>Approval by Head Country or Corporate In-House Legal Counsel required (as AAE or otherwise)</li> <li>AAE approval and Support Agreement must be obtained <u>in advance</u> of any expense incurred</li> <li>Payment to an institutional account is strongly preferred; if impossible, payment should be by traceable instrument. If monetary payment is the only option, Barrick employee must witness the payment to each individual, and obtain verification of receipt by having the official sign a roster or receipt prepared by Barrick, unit commanders, or other designated</li> </ul>

Type	AAE Approval Required?	Support Agreement Required?	General and Specific Conditions
			individuals
Police/Public Law Enforcement Voluntary Support Allowances	✓	✓	
Other Direct Support to Government Officials	✓	✓	
In-Kind Government Support			<ul style="list-style-type: none"> <li>• If <u>security related</u>, approval in advance by Head Country or Corporate In-House Legal Counsel required (as AAE or otherwise), and Support Agreement in advance is required (regardless of amount)</li> <li>• If not security related, Support Agreement required in advance if the support is valued over USD\$1,000 or limit set locally, or is provided on a regular recurring basis.</li> <li>• Must be sourced through Barrick, whenever possible</li> </ul>
Vehicles (usage, gifting, or servicing)	✓	✓	
Food Service	✓	✓	<ul style="list-style-type: none"> <li>• Meals can be integrated in Barrick's food service system.</li> </ul>
Accommodations	✓	✓	<ul style="list-style-type: none"> <li>• To the extent police accommodations are unavailable, Barrick may provide barracks accommodations. Hotel accommodations are a last resort. All furniture, equipment, and other goods provided as part of accommodations should be registered and tracked.</li> </ul>
Administrative Equipment (including laptops and desktops)	✓	✓	<ul style="list-style-type: none"> <li>• Equipment must be registered and tracked.</li> </ul>
Per Diems			<ul style="list-style-type: none"> <li>• If <u>security related</u>, approval in advance by Head Country or Corporate In-House Legal Counsel required (as AAE or otherwise), and Support Agreement in advance is required (regardless of amount)</li> <li>• Wherever possible should be paid to the beneficiary by check or bank transfer. Monetary Per Diems should be avoided. If necessary, they require written receipt and signature by government official. Amounts will be paid only in accordance with applicable government official procedures/rates or as per Support Agreement with the applicable government institution.</li> </ul>
Per Diems	✓	✓ (if no published rate exists, or payment exceeds published rate)	
Meals, Gifts, and Entertainment			<ul style="list-style-type: none"> <li>• AAE approval (if required) must be obtained for gifts above USD\$100 or limit set locally, in advance of any expense incurred, unless otherwise noted</li> </ul>

Type	AAE Approval Required?	Support Agreement Required?	General and Specific Conditions
Holiday Parcels	✓		<ul style="list-style-type: none"> <li>Only one gift parcel may be given to any government official in a calendar year and only in connection with a significant holiday where such a gift may be customary. Country Executive Director must approve list of recipients each year.</li> </ul>
Commemorative Gifts	✓		<ul style="list-style-type: none"> <li>Must commemorate an event.</li> </ul>
Business Meals or Entertainment	✓		<ul style="list-style-type: none"> <li>Must be business-related.</li> <li>If pre-approval is impractical or not feasible, approval should be obtained as soon as practicable after, and in any event before reimbursement is provided.</li> </ul>
Charitable and Cultural Donations			<ul style="list-style-type: none"> <li>If <u>security related or recipient has direct or indirect government affiliation</u>, approval in advance by Head Country or Corporate In-House Legal Counsel required (as AAE or otherwise), and Support Agreement in advance is required (regardless of amount)</li> <li>In-kind is preferred</li> </ul>
Monetary or in-kind charitable or cultural donations to support or sponsor events or initiatives	✓ (if affiliated with government, <u>or</u> valued over USD \$5,000/or limit set locally)	✓ (if affiliated with government, <u>or</u> valued over USD \$10,000/or limit set locally)	No expense account reimbursements are permitted. If above USD \$10,000 (or limit set locally), approval by Country Executive Director. If above USD \$100,000, also approval by the President (or the Chief Sustainability Officer).
Trainings	✓ (if affiliated with government, <u>or</u> valued over USD \$5,000/or limit set locally)	✓ (if affiliated with government, <u>or</u> valued over USD \$10,000/or limit set locally)	Only if closely related to Barrick operations. However, does not prohibit joint training exercises or planning related to public safety in the mine area. If above USD \$10,000 (or limit set locally), approval by Country Executive Director. If above USD \$100,000, also approval by the President (or the Chief Sustainability Officer).
Political Contributions			<ul style="list-style-type: none"> <li>Always requires advance approval from President or his or her designee, and Head Country or Corporate In-House Legal Counsel (as AAE or otherwise).</li> <li>Employees are permitted to make contributions of money or services in their individual capacity.</li> </ul>
Political Contributions	✓		
Agreements with Government-Affiliated Third Parties			<ul style="list-style-type: none"> <li>Approval by Head Country or Corporate In-House Legal Counsel required, in advance</li> <li>Barrick business owner employees must conduct preliminary due diligence, and support additional due diligence by legal.</li> </ul>
Agreements with Government-Affiliated Third Parties	✓	✓	

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## **APPENDIX B**

### **Business Travel and Incidentals for Government Officials**

This Procedure must be read in conjunction with, and assists in implementing, Barrick's Travel Expense Policy. Whenever the Company provides travel for third parties, including government officials, anti-bribery and anti-corruption laws and the Policy may be implicated. To ensure compliance with the Anti-Bribery and Anti-Corruption Policy, all Barrick sponsored business travel and incidentals provided to government officials ("Sponsored Government Business Travel and Incidentals") must comply with the following general parameters, in addition to the requirements described in the table below related to specific situations.

All Sponsored Government Business must be:

- Permitted by local law.
- Approved by an Authorized Approval Employee in advance of any expense incurred, unless otherwise noted. If it is security related, review by Corporate or Head Country In-House Legal Counsel is required (either as the Authorized Approval Employee or otherwise).
- In-kind or with expenses paid directly to the travel provider, and not in cash.
- Generally consistent with Barrick's Travel Policy in terms of class of travel.
- Reasonable, and not lavish or expensive.
- Not intended predominantly for recreation or entertainment.
- Consistent with the government official's rank or level.
- Directly and immediately related to Barrick operations.
- Not provided in addition to a government per diem or other payment for the same purpose whether by Barrick or the government/agency in question (i.e., no double dipping).
- Made transparent to the government official's supervisor (note that in certain circumstances, the supervisor's consent may be necessary).
- Pursuant to a Support Agreement approved by Corporate or Head Country In-House Legal Counsel, and potentially additional due diligence on the officials themselves, in cases involving support for international travel of government officials, or for the spouses of government officials (domestic or international), or which is security related (regardless of amount).

Sponsored Government Business Travel and Incidental Parameters are as follows:

1. Any employee seeking approval (or reimbursement, when permitted) for business travel or incidentals for a government official must request and obtain approval through his or her existing local process (including global and local Delegations of Authority). This procedure does not dictate who within a functional unit may initiate a Sponsored Government Business Travel request, or the normal travel approval processes; those requirements are determined by the individual functional units, Sites, and/or countries, and contained in the Travel Expense Policy.

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2. In addition to the existing local process, the request must be submitted for anti-corruption review to an Authorized Approval Employee. The request should include relevant backup documentation, which should include:
  - a. Either (a) an attached request from the government official, or alternatively, (b) an internal note or memo documenting the request from the government official, including his or her identity and position;
  - b. Documents (or receipts, when prior approval is not required) supporting the amounts requested;
  - c. An explanation for why the support is necessary and appropriate; and
  - d. A Support Agreement in cases involving support for international travel of government officials, for the spouses/partners/family of government officials (domestic or international), or if the support is security related (regardless of amount).
  
3. The Authorized Approval Employee will review the request, the backup documentation, and the Support Agreement (if required) to determine whether the request complies with this Procedure and the Policy and whether additional due diligence is necessary.
  - a. If the Authorized Approval Employee determines that the request complies with this Procedure and the Policy, he or she shall inform the requester of the approval. The requester can then incur or authorize the expense and subsequently seek payment or reimbursement from finance and accounting.
  - b. If the Authorized Approval Employee determines that the request does not comply with this Procedure or the Policy, he or she may return the material to the requester for completion, deny the request, request additional documentation, or seek further information.

**Each payment request must go through this process even if a Support Agreement has been signed.**

The following table sets forth the types of travel and incidental requests most frequently made, and the conditions that must be satisfied with respect to such support.

Type of Support	Conditions on the Support
Domestic Flight or Train Travel	<ul style="list-style-type: none"> <li>• AAE approval is required</li> <li>• If security related, Support Agreement is also required</li> <li>• AAE approval and Support Agreement (if required) must be obtained in advance of any expense incurred</li> <li>• Barrick should purchase or arrange</li> </ul>
International Flight	<ul style="list-style-type: none"> <li>• AAE approval and Support Agreement, obtained in advance, are required</li> <li>• Barrick should purchase or arrange</li> </ul>
Spouse/Partner/Family Travel	<ul style="list-style-type: none"> <li>• AAE approval and Support Agreement, obtained in advance, are required</li> <li>• Only for visits where spouse/partner/ family travel is customary and appropriate</li> <li>• Barrick should purchase or arrange</li> </ul>

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Taxi	<ul style="list-style-type: none"> <li>• AAE approval is required if above USD \$50 per fare/or limit set locally</li> <li>• If security related, AAE approval and Support Agreement are always required regardless amount</li> <li>• AAE approval and Support Agreement (if required) should be obtained in advance of any expense incurred. However, if necessary AAE approval for taxi can be processed after the fact (except if security related) but always prior reimbursement or expense reports</li> <li>• Receipts preferred for all amounts, required for fares of USD \$25 or higher (or limit set locally)</li> <li>• Barrick should purchase or arrange</li> </ul>
Rental Car	<ul style="list-style-type: none"> <li>• AAE approval is required</li> <li>• If security related, Support Agreement is also required</li> <li>• AAE approval and Support Agreement (if required) should be obtained in advance of any expense incurred. However, if necessary, AAE approvals can be processed after the fact if Rental Car is for 3 days or less (except if security related) but always prior reimbursement or expense reports.</li> <li>• Barrick should purchase or arrange.</li> </ul>
Hotel and Incidentals	<ul style="list-style-type: none"> <li>• AAE approval is required.</li> <li>• If security related, Support Agreement is also required</li> <li>• AAE approval and Support Agreement (if required) should be obtained in advance of any expense incurred. However, if necessary, AAE approval for the following incidentals can be processed after the fact (except if security related) but always prior reimbursement or expense reports: meals, laundry, or use of business center for less than USD\$50 per person (or limit set locally).</li> <li>• Barrick should purchase or arrange.</li> </ul>

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## APPENDIX C

### Direct Monetary Government Support

“Direct Monetary Government Support” includes daily support allowances, hardship allowances, extra duty allowances and out-of-station allowances made on a regular recurring basis. It is distinguishable from per diems (See [Appendix E](#)), which contemplate small one-time or irregularly recurring payments to government officials or government entities.

All Direct Monetary Government Support must be:

- Permitted under local law.
- Approved by an Authorized Approval Employee in advance of any expense incurred.
- Directly and immediately related to Barrick operations.
- Used for purposes other than weaponry, ammunition or other related equipment or gear.
- Made to an institutional account of the government entity.
  - To individuals only if strictly necessary, with payment made directly to the individual official through traceable instrument (e.g., not cash) and with appropriate controls.
  - Custodial payments (e.g., payments to a supervisor or superior officer for distribution to others) are not permitted except in exigent circumstances, approved by an AAE.
  - Cash payments are not permitted except in exigent circumstances; if they are made, Barrick employee must witness the payment to each individual, and obtain verification of receipt by having the official sign a roster or receipt prepared by Barrick, unit commanders, or other designated individuals. No custodial cash payments are permitted without the express consent of an AAE.
- If a hardship our out-of-station allowance is provided, the official must be out-of-station and away from their primary office, unless otherwise approved by an AAE.
- Pursuant to a Support Agreement approved by Corporate or Head Country In-House Legal Counsel, and potentially additional conditions and/or due diligence requirements as specified by such legal counsel.

Direct Monetary Government Support Parameters are as follows:

1. Any employee seeking approval for daily support and out-of-station allowances for a government official must request and obtain approval through his or her existing local process (including global and local Delegations of Authority). This Procedure does not dictate who within a functional unit may initiate a Direct Monetary Government Support request; those requirements are determined by the individual functional units, Sites, and/or countries.

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2. In addition to the existing local process, the request must be submitted for anti-corruption review to an Authorized Approval Employee prior to payment. The request should include relevant backup documentation, which should include:
  - a. A Support Agreement, reviewed by legal;
  - b. Either (a) an attached request from the government official, or alternatively, (b) an internal note or memo documenting the request from the government official;
  - c. Rosters or lists of the individuals receiving the support; and
  - d. An explanation of why the support is necessary and appropriate, and how it was calculated.
  
3. The Authorized Approval Employee will review the request, the backup documentation, and the Support Agreement to determine whether the request complies with this Procedure and the Policy, and whether additional conditions and/or due diligence are required.
  - a. If the Authorized Approval Employee determines that the request complies with this Procedure and the Policy, he or she shall inform the requester of the approval in writing. The requester can then incur or authorize the expense and subsequently seek payment or reimbursement from finance and accounting.
  - b. If the Authorized Approval Employee determines that the request does not comply with this Procedure or the Policy, he or she may return the material to the requester for completion, deny the request, request additional documentation, or seek further information.

**Each payment request must go through this process, even if a Support Agreement has been signed.**

The following table sets forth the types of direct monetary government support requests most frequently made and the conditions that must be satisfied with respect to such support.

Type of Support	Conditions on Support
Police/Public Law Enforcement Voluntary Support Allowances	<ul style="list-style-type: none"> <li>• AAE approval, review by Head Country or Corporate In-House Legal Counsel (as AAE or otherwise), and Support Agreement are required in advance</li> <li>• Payment to an institutional account is strongly preferred; if impossible, payment should be by traceable instrument directly to the individual official and with appropriate controls, and not made to a third party for distribution (e.g., on a custodial basis). Only in exigent circumstances can payment be made on a custodial basis, and if so, payment must be through traceable instrument and not cash. In a true emergency, and cash payment is the only option, Barrick employee must witness the payment to each individual, and obtain verification of receipt by having the official sign a roster or receipt prepared by</li> </ul>
Other Direct Support to Government Officials	



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	Barrick, unit commanders, or other designated individuals.
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## APPENDIX D

### In-Kind Government Support

Throughout its operations, Barrick may be asked to provide in-kind support (support in the form of goods or services) to host governments or individual government officials, whether through equipment (like computers or printers or automobiles), travel, meals, accommodations, or otherwise.

All In-Kind Government Support must be:

- Legitimate, necessary for the government to provide services, reasonable in amount, and permitted under local law.
- Approved by an Authorized Approval Employee in advance of any expense incurred.
- Directly and immediately related to Barrick operations.
- In a form other than weaponry, ammunition or other related equipment or gear.
- Sourced through Barrick (either by purchasing directly from a vendor or otherwise providing the in-kind support). If any material is sourced from an outside vendor or vendors, or a vendor is recommended by a government official, the request must be reviewed by Corporate or Head Country In-House Legal Counsel.
- Returned to Barrick, if non-consumable, upon completion of usage.
- Pursuant to a Support Agreement approved by Corporate or Head Country In-House Legal Counsel if support is related to security (regardless of amount) or is valued above USD \$1,000 (or other limit set locally), and potentially additional conditions and/or due diligence requirements as specified by such legal counsel.

In-Kind Government Support Parameters are as follows:

1. Any employee seeking approval for in-kind government support must request and obtain approval through his or her existing local process (including global and local Delegations of Authority). This Procedure does not dictate who within a functional unit may initiate an In-Kind-Government Support request; those requirements are determined by the individual functional units, Sites, and/or countries.
2. In addition to the existing local process, the request must be submitted for anti-corruption review to an Authorized Approval Employee. The request should include relevant backup documentation, which should include:
  - a. Either (a) an attached request from the government official, or alternatively, (b) an internal note or memo documenting the request from the government official;
  - b. Rosters or a list of the individuals or organizations receiving the support (where support is being provided to individuals or organizations), and

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receipts or documents supporting the amounts requested, where reimbursement is sought;

- c. An explanation for why the support is necessary and appropriate, and how it was calculated; and
  - d. A Support Agreement for (a) all in-kind security support (not including weaponry, ammunition or other related equipment or gear, the provision of which is not covered by these Procedures), (b) all in-kind support that is to occur on a regular recurring basis, and (c) all in-kind support valued in excess of USD\$1,000.
3. The Authorized Approval Employee will review the request, the backup documentation, and the Support Agreement (if required) to determine whether the request complies with this Procedure and the Policy, and whether additional due diligence is required.
- a. If the Authorized Approval Employee determines that the request complies with this Procedure and the Policy, he or she shall inform the requester of the approval in writing. The requester can then incur or authorize the expense and subsequently seek payment or reimbursement from finance and accounting.
  - b. If the Authorized Approval Employee determines that the request does not comply with this Procedure or the Policy, he or she may return the material to the requester for completion, deny the request, request additional documentation, or seek further information.

**Each provision of In-Kind Government Support must go through this process, even if a Support Agreement has been signed.**

The following table sets forth the types of in-kind government support requests most frequently made and the conditions that must be satisfied with respect to such support.

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Type of Support	Conditions on Support
Vehicles (Including purchasing, renting, repairs, maintenance or fuel)	<ul style="list-style-type: none"> <li>• AAE approval is required. If security related, review by Head Country or Corporate In-House Legal Counsel is required (as AAE or otherwise)</li> <li>• Support Agreement is required if valued above USD \$1000 (or other limit set locally), if occurring on a regular recurring basis, <u>or</u> if in connection with security regardless amount</li> <li>• AAE approval and Support Agreement (if required) must be obtained in advance of any expense incurred</li> <li>• Must be sourced through Barrick, whenever possible</li> <li>• Examples may include maintenance, fuel/oil, spare parts, and maintenance services</li> </ul>
Food Service	<ul style="list-style-type: none"> <li>• AAE approval is required. If security related, review by Head Country or Corporate In-House Legal Counsel is required (as AAE or otherwise)</li> <li>• Support Agreement is required if valued above USD \$1000 (or other limit set locally), if occurring on a regular recurring basis, <u>or</u> if in connection with security regardless amount</li> <li>• AAE approval and Support Agreement (if required) must be obtained in advance of any expense incurred</li> <li>• Must be sourced through Barrick, whenever possible</li> <li>• Meals can be integrated in the Barrick's food service system</li> </ul>
Accommodations	<ul style="list-style-type: none"> <li>• AAE approval is required. If security related, review by Head Country or Corporate In-House Legal Counsel is required (as AAE or otherwise)</li> <li>• Support Agreement is required if valued above USD \$1000 (or other limit set locally), if occurring on a regular recurring basis, <u>or</u> if in connection with security regardless amount</li> <li>• AAE approval and Support Agreement (if required) must be obtained in advance of any expense incurred</li> <li>• Must be sourced through Barrick, whenever possible</li> <li>• To the extent police accommodations are unavailable, Barrick may provide barracks accommodation. Hotel accommodations are a last resort</li> <li>• All furniture, equipment, and other goods provided as part of accommodations must be registered and tracked</li> </ul>
Administrative Equipment (e.g. laptops and	<ul style="list-style-type: none"> <li>• AAE approval is required. If security related, review by Head Country or Corporate In-House Legal Counsel is required (as AAE or otherwise)</li> </ul>

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desktops)	<ul style="list-style-type: none"> <li>• Support Agreement is required if valued above USD \$1000 (or other limit set locally), if occurring on a regular recurring basis, <u>or</u> if in connection with security regardless amount</li> <li>• AAE approval and Support Agreement (if required) must be obtained in advance of any expense incurred</li> <li>• Must be sourced through Barrick, whenever possible</li> <li>• Equipment must be registered and tracked</li> </ul>
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## APPENDIX E

### **Per Diems for Government Officials**

Per Diems for government officials are contemplated as one-time or infrequent small payments. Customary categories of Per Diems include out-of-station, hardship, accommodation, and additional duty allowances. They are distinguished from direct monetary support, which is provided on a regular recurring basis.

All Per Diems for government officials must be:

- Permitted by local law and consistent with published government rates for per diem payments (or where no published rates exist, or if the payment is above the published rate, pursuant to a Support Agreement approved by Corporate or Head Country In-House Legal Counsel).
- Approved by an Authorized Approval Employee in advance of any expense incurred.
- Directly and immediately related to Barrick operations.
- Modest in amount, and intended to defray legitimate expenses incurred by the government official for an approved purpose where those expenses are not paid directly by Barrick to the vendor.
- Not duplicative of payments the official will receive from his or her agency (i.e., no double dipping).
- If a per diem is provided, the official must be out-of-station and away from their primary office, unless otherwise approved by an AAE.

Per Diems for Government Officials Parameters are as follows:

1. Any employee seeking approval for per diems for a government official must request and obtain approval through his or her existing local process (including global and local Delegations of Authority). This Procedure does not dictate who within a functional unit may initiate a per diem request for government officials; those requirements are determined by the individual functional units, Sites and/or countries.
2. In addition to the existing local process, the request must be submitted for anti-corruption review to an Authorized Approval Employee. The request should include relevant backup documentation, which should include:
  - a. Either (a) an attached request from the government official, or alternatively, (b) an internal note or memo documenting the request from the government official;
  - b. Rosters or a list of individuals receiving the per diem payment; and
  - c. An explanation for why the per diem payment is necessary and appropriate, and how it was calculated.
3. The Authorized Approval Employee will review the request form and the backup documentation to determine whether the request complies with this Procedure and the Policy.

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- a. If the Authorized Approval Employee determines that the request complies with this Procedure and the Policy, he or she shall inform the requester of the approval in writing. The requester can then incur or authorize the expense and subsequently seek payment or reimbursement from finance and accounting.
- b. If the Authorized Approval Employee determines that the request does not comply with this Procedure or the Policy, he or she may return the material to the requester for completion, deny the request, request additional documentation, or seek further information.

**Each payment request must go through this process, even if a Support Agreement has been signed.**

The following table sets forth the types of per diem requests most frequently made and the conditions that must be satisfied with respect to such support.

Type of Support	Conditions on Support
Per Diems	<ul style="list-style-type: none"> <li>• AAE approval is required. If security related, review by Head Country or Corporate In-House Legal Counsel is required (as AAE or otherwise)</li> <li>• Support Agreement is required if no published rate exists</li> <li>• AAE approval and Support Agreement (if required) must be obtained in advance of any expense incurred</li> <li>• If payment must be to an individual, it should be paid by check or bank transfer. Monetary Per Diems should be avoided. If necessary, they require written receipt and signature by government official</li> <li>• Amounts will be paid only in accordance with applicable government official published procedures/rates, or as per Support Agreement with the applicable government institution</li> </ul>

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## APPENDIX F

### **Meals, Gifts and Entertainment for Government Officials**

All meals, gifts and entertainment must be:

- Permitted by local law and consistent with Company business practices.
- Approved by an Authorized Approval Employee in advance of any expense incurred in cases where the amount is above USD \$100 per person (or other limit set locally). However, if pre-approval is impractical or not feasible, approval should be obtained as soon as practicable after, and in any event before reimbursement is provided.
- Not lavish or unreasonably expensive (in each case or on a cumulative basis), and not greater than the legitimate and customary expenditure for such gifts or activities by private business persons in the recipient's country.
- Directly connected to a legitimate business promotional activity or the performance of an existing contract
- Consistent with the government official's rank, level, and the occasion.
- In kind, not in cash.
- Gifts with Barrick logos, or gifts which cannot be resold or which are consumable (e.g. flowers, fruit baskets), are best.
- Transparent to the recipient's organization (note that it may be appropriate to seek confirmation from the recipient that his or her manager has approved the receipt of hospitality or of a small gift).
- In cases where such benefit (regardless of amount) is offered to an official considering, or deciding on, a matter directly affecting Barrick's business or interests, including potentially additional due diligence, approval must be obtained from the Head Country In-House Legal Counsel

Meals, Gifts and Entertainment Parameters are as follows:

1. Any employee seeking approval (or reimbursement, when permitted) for meals, gifts and entertainment for a government official must request and obtain approval through his or her existing local process (including global and local Delegations of Authority). This Procedure does not dictate who within a functional unit may initiate a meal, gift or entertainment request; those requirements are determined by the individual functional units, Sites, and/or countries. (N.B. If pre-approval is impractical or not feasible, approval should be obtained as soon as practicable after, and in any event before reimbursement is provided.)
2. In addition to the existing local process and if the request relates to an amount above USD\$100 per person (or other limit set locally), it must be submitted for additional anti-corruption review to an Authorized Approval Employee. The request should include relevant backup documentation, which should include:
  - a. A list of individuals receiving the meals, gift or entertainment, and their position, and whether any are considering, or deciding on, a matter directly affecting Barrick's business or interests;



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- b. Documents (or receipts, when prior approval is not required) supporting the amounts requested; and
  - c. An explanation for why the meal, gift and entertainment is necessary and appropriate.
  
3. The Authorized Approval Employee will review the request and the backup documentation to determine whether the request complies with this Procedure and the Policy, and whether additional due diligence is required.
  - a. If the Authorized Approval Employee determines that the request complies with this Procedure and the Policy, he or she shall inform the requester of the approval in writing. The requester can then incur or authorize the expense and subsequently seek payment or reimbursement from finance and accounting.
  - b. If the Authorized Approval Employee determines that the request does not comply with this Procedure or the Policy, he or she may return the material to the requester for completion, deny the request, request additional documentation, or seek further information.

**Each Meal, Gift and Entertainment -above USD\$100 per person (or other limit set locally) request must go through this process.**

The following table sets forth the types of meal, gift and entertainment requests most frequently made and the conditions that must be satisfied with respect to such support.

Type of Support	Conditions on Support
Holiday Parcels	<ul style="list-style-type: none"> <li>• AAE approval is required if above USD \$100 per person/or limit set locally</li> <li>• AAE approval must be obtained in advance of any expense incurred</li> <li>• One gift parcel may be given to any government official in a calendar year, in connection with a significant holiday where such gift may be customary</li> <li>• The Country Executive Director must approve list of recipients each year</li> </ul>
Commemorative Gifts	<ul style="list-style-type: none"> <li>• AAE approval is required if above USD \$100 per person/or limit set locally</li> <li>• AAE approval must be obtained in advance of any expense incurred</li> <li>• Gifts must commemorate an event</li> </ul>
Business Meals and Entertainment Expenses	<ul style="list-style-type: none"> <li>• AAE approval is required if above USD \$100 per person/or limit set locally</li> <li>• AAE approval must be obtained in advance of any expense incurred. However, if obtaining pre-approval would be impractical or infeasible, it should be obtained as soon as practicable afterwards and in any event before reimbursement is provided</li> <li>• Must be business related</li> </ul>

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## APPENDIX G

### CHARITABLE AND CULTURAL DONATIONS

All charitable or cultural donations must be:

- Permissible under local law.
- Approved by an Authorized Approval Employee (and where applicable, by a Country Executive Director and the President or his or her designee) in advance of any expense incurred, unless otherwise noted.
- To the Government *per se* or a recognized charity or entity only, not a specific government official.
- Supported, where applicable, by a detailed budget and/or detailed receipts.
- For charities or cultural donations, including initiatives or events, supported or sponsored, where applicable, by documentation indicating that the charity, initiative or event is not connected to, or was not referred by, a government official (or close relative thereof), and where the charity or cultural donation is connected to a government official (or close relative thereof) appropriate due diligence.
- In-kind donations are preferred.

Where applicable, verification must be sought that the support was used as described and intended (such as through visual inspection), that the charity at issue is *bona fide* in nature.

Charitable and cultural donation parameters are as follows:

1. Any employee seeking approval for a charitable or cultural donation, including to sponsor events and initiatives, must first conduct appropriate due diligence to assess, as related to the type of donation, whether the proposed recipient is directly or indirectly affiliated with the government, whether the donation can be expected to be put to the stated use, and whether the proposed recipient's reputation is acceptable to Barrick. Upon completion of due diligence, the employee seeking approval must request and obtain approval through his or her existing local process (including global and local Delegations of Authority). This Procedure does not dictate who within a functional unit may initiate a donation, contribution or cultural event request; those requirements are determined by the individual functional units, Sites, and/or countries.
  - a. Authorized Approval Employee review is not required for charitable or cultural donations, including to sponsor events and initiatives, of USD \$5,000 or less than (or amounts set locally), unless
    - i. it is related to security (which also requires legal approval), or
    - ii. it is connected to the government or government official (e.g., requested by a government official, or the recipient is connected to a government official or relative).
  - b. Authorized Approval Employee review is required for charitable or cultural donations, including to sponsor events and initiatives, above USD \$5,000

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(or amounts set locally), or if related to security (regardless of amount, and which also requires legal approval) or connected to the government or a government official (regardless of amount).

- c. Charitable or cultural donations, including to sponsor events and initiatives, above USD \$10,000 (or limit set locally) requires approval of the Country Executive Director (or his or her designee).
  - d. Charitable or cultural donations, including to sponsor events and initiatives, above USD \$100,000 also require the approval of the President (or the Chief Sustainability Officer, as an alternative).
  - e. A support agreement is required if the request is
    - i. for a monetary or in-kind charitable or cultural donation in excess of USD \$10,000, or
    - ii. a charitable or cultural donation to a recipient that has direct or indirect government affiliation (regardless of amount), or
    - iii. is security related (regardless of amount), which also requires legal approval.
2. The approval request should include relevant backup documentation, which, where relevant, should include:
- i. Either (a) an attached request from the government official or agency, or (b) an internal note or memo documenting the request from the government official or agency;
  - ii. A list of the individuals or organizations receiving the donations, contributions or payments in connection with charities or cultural events or initiatives
  - iii. A description of the charitable or cultural donation and how the requestor determined it is a *bona fide* charity or cultural initiative or event to support or sponsor, if applicable, unconnected to any government official (as per the above);
  - iv. A detailed budget, where applicable;
  - v. An explanation for why the payment is appropriate, and how it was calculated;
  - vi. Documentation of due diligence on the reputation and prior history of any public officials involved, directly and indirectly; and
  - vii. A Support Agreement if required under Paragraph 1(e) above.
3. The Authorized Approval Employee will review the request, the backup documentation, and the Support Agreement (if required) to ensure that the request complies with the Policy and this Procedure.

The requester is responsible for providing written evidence to the Authorized Approval Employee that the required authorizations have been obtained. The Country Executive Director, the President, or their designees, as applicable, may request any documentation necessary to assess the donation.

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- i. If the Authorized Approval Employee determines, pursuant to an approval from the Country Executive Director, President or their designees (as applicable), that the support complies with this Procedure and the Policy, he or she shall inform the requester of the approval in writing. The requester can then incur or authorize the expense and subsequently seek payment or reimbursement from finance and accounting.
- ii. If the Authorized Approval Employee determines that the request does not comply with this Procedure or the Policy, he or she may return the material to the requester for completion, deny the request, request additional documentation, or seek further information.

**Each payment request must go through this process, even if a Support Agreement has been signed.**

The following table sets forth the types of donations, contributions and cultural event requests most frequently made and the conditions that must be satisfied with respect to such support.

Type of Support	Conditions on Support
Monetary or in-kind charitable or cultural donations to support or sponsor events or initiatives directly or indirectly affiliated with government <u>or</u> security related	<ul style="list-style-type: none"> <li>• In addition to existing local processes:               <ul style="list-style-type: none"> <li>○ Country Executive Director (or his or her designee) must approve donations above USD \$10,000 (or limit set locally)</li> <li>○ The President (or the Chief Sustainability Officer) must also approve donations above USD \$100,000</li> </ul> </li> <li>• AAE approval and Support Agreement, obtained in advance, are always required. No expense account reimbursements are allowed.</li> </ul>
Monetary or in-kind charitable or cultural donations to support or sponsor events or initiatives <u>not</u> affiliated directly or indirectly with government <u>and</u> not security related	<ul style="list-style-type: none"> <li>• In addition to existing local processes:               <ul style="list-style-type: none"> <li>○ Country Executive Director (or his or her designee) must approve donations above USD \$10,000 (or limit set locally)</li> <li>○ The President (or the Chief Sustainability Officer) must also approve donations above USD \$100,000</li> </ul> </li> <li>• AAE approval is required for donations above</li> </ul>

	<p>USD \$5000 (or limit set locally)</p> <ul style="list-style-type: none"> <li>• Support Agreement is required for donations above USD \$10,000 (or limit set locally)</li> <li>• AAE approval (if required) and Support Agreement (if required) must be obtained in advance of any expense incurred. No expense account reimbursements are allowed.</li> </ul>
<p>Training provided to charities or cultural events or initiatives directly or indirectly affiliated with <u>government or security related</u></p>	<ul style="list-style-type: none"> <li>• In addition to existing local processes: <ul style="list-style-type: none"> <li>○ Country Executive Director (or his or her designee) must approve trainings above USD \$10,000 (or limit set locally)</li> <li>○ The President (or the Chief Sustainability Officer) must also approve trainings above USD \$100,000</li> </ul> </li> <li>• AAE approval and Support Agreement are always required, obtained in advance of any expense incurred. No expense account reimbursements are allowed</li> <li>• Only if related to Barrick operations</li> <li>• Does not prohibit joint training exercises or planning related to public safety in the mine area.</li> </ul>
<p>Training provided to charities or cultural events or initiatives <u>not directly or indirectly affiliated</u> with government <u>and not security related</u></p>	<ul style="list-style-type: none"> <li>• In addition to existing local processes: <ul style="list-style-type: none"> <li>○ Country Executive Director (or his or her designee) must approve trainings above USD \$10,000 (or limit set locally)</li> <li>○ The President (or the Chief Sustainability Officer) must also approve trainings above USD \$100,000</li> </ul> </li> <li>• AAE approval is required for trainings above USD \$5000 (or limit set locally)</li> <li>• Support Agreement is required for trainings above USD \$10,000 (or limit set locally)</li> <li>• AAE approval (if required) and Support Agreement (if required) must be obtained in</li> </ul>

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	<p>advance of any expense incurred. No expense account reimbursements are allowed.</p> <ul style="list-style-type: none"> <li>• Only if related to Barrick operations.</li> <li>• Does not prohibit joint training exercises or planning related to public safety in the mine area.</li> </ul>
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## APPENDIX H

### Political Contributions

All political contributions made by Barrick must be:

- Permissible under local law.
- Approved for compliance with relevant political contribution laws, as well as the Policy and this Procedure, by a Corporate or Head Country In-House Legal Counsel and President (or his or her designee).
- Made to a properly authorized account for a candidate, political party, or other political organization designated to accept contributions.
- Made by traceable instrument, i.e., not cash.

Political contribution parameters are as follows:

1. Any employee seeking approval for a political contribution on behalf of Barrick must first conduct appropriate due diligence to assess whether the proposed recipient's reputation is acceptable to Barrick and whether such donation would give rise to any corruption concerns. Upon completion of due diligence, the employee seeking approval must request and obtain approval through his or her existing local process (including global and local Delegations of Authority). This Procedure does not dictate who within a functional unit may initiate a political contribution. Those requirements are determined by the individual functional units, Sites, and/or countries.
2. In addition to the existing local process, the request must be reviewed by Corporate or Head Country In-House Legal Counsel for compliance with relevant political donation laws, and the Policy and this Procedure. The request should include relevant backup documentation, which should include:
  - i. Documentation of due diligence on the reputation and prior history of the candidate, political party, or political organization.
  - ii. Written documentation of the amount and nature of the contribution.
  - iii. Verification that the donation is not in exchange for any specific discretionary action that the official may take.
  - iv. Verification that the donation is being made to an appropriate account (e.g., not a personal account, overseas account, etc.).
3. Corporate or Head Country In-House Legal Counsel will review the request and the backup documentation to ensure that it complies with applicable laws, and the Policy and this Procedure. The relevant functional manager must also seek the written approval of the President (or his or her designee).

The President, or his or her designees, as applicable, may request any documentation necessary to assess the donation.

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- i. If Corporate or Head Country In-House Legal Counsel determines that the contribution is lawful and complies with this Procedure and the Policy, he or she shall inform the requester of the approval in writing. The requester can then seek approval from the President (or his or her designee), and incur or authorize the expense and subsequently seek payment or reimbursement from finance and accounting.
- ii. If Corporate or Head Country In-House Legal Counsel determines that the request is not lawful, or does not comply with this Procedure or the Policy, he or she may return the material to the requester for completion, deny the request, request additional documentation, or seek further information.

The following table sets forth the types of donations, contributions and cultural event requests most frequently made and the conditions that must be satisfied with respect to such support.

Type of Support	Conditions on Support
Political Contributions (to candidates, political parties, or other political organizations)	<ul style="list-style-type: none"> <li>• AAE approval is always required. AAE must be Head Country or Corporate In-House Legal Counsel</li> <li>• It also requires approval from President or his or her designee</li> <li>• AAE approval must be obtained in advance of any expense incurred</li> <li>• Employees are permitted to make contributions of money or services in their individual capacity</li> </ul>



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## **APPENDIX I**

### **Support Agreements with Government and Government-affiliated Third Parties**

Regardless of the amount at issue or the nature of the contract at issue, all Support Agreements or contracts with the following individuals or entities must be presented to Corporate or Head Country In-House Legal Counsel for review and approval:

- a) a government official (or immediate relative of a government official, such as a spouse/partner, parent or parent-in law, child or son/daughter in-law, stepson or stepdaughter, aunt or uncle, niece or nephew, sibling or brother/sister in-law);
- b) a government entity;
- c) any business owned in whole or part by a government, or officially or unofficially controlled by a government, other than instances where such ownership or control relates to less than five percent of the issued shares of a publicly traded company;
- d) any business owned in whole or part by government official (or immediate relative thereof), other than instances where such ownership relates to less than five percent of the issued shares of a publicly traded company;
- e) any contractor referred to Barrick by a government official (or immediate relative thereof); or
- f) any third party that will represent Barrick before a government agency or official, or will interface with the government on Barrick's behalf or benefit.

Barrick employees sponsoring, or proposing to enter into such contracts, must make inquiries and conduct initial appropriate due diligence to determine whether the contract involves any of the above individuals or entities. Guidance on the nature of appropriate initial due diligence may be obtained from Head Country or Corporate In-House Legal Counsel.

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**APPENDIX J**

**SAMPLE SUPPORT AGREEMENT (TRAINING)**

**MEMORANDUM OF UNDERSTANDING  
REGARDING VOLUNTARY SUPPORT**

This Agreement is made this \_\_\_\_ day of \_\_\_\_\_, in the year \_\_\_\_\_, by and between the following parties:

[Barrick Entity (hereinafter “Barrick”)]

And

[Government Entity] (hereinafter the “Ministry”)]

**WHEREAS:**

- A. Barrick operates the [Mine Site] in [country] (“Mine Site”);
- B. The development and mining of Mine Site requires [ ], including usages that heretofore have not commonly been employed in the [country] by large-scale mining projects;
- C. The Ministry maintains responsibility to monitor, oversee, and supervise the use of [ ] at Mine Site, for security, safety and other purposes;
- D. The parties agree that to effectively carry out its responsibilities, the Ministry and certain of its employees require additional technical training and understandings in the use of [ ] in the manner contemplated at Mine Site;
- E. The Ministry has requested that Barrick provide, on a voluntary basis, support to assist in that training and understandings; and
- F. Barrick has agreed to voluntarily provide support consistent with the Ministry’s request, and subject to the terms and conditions set forth below.

**IT IS AGREED AS FOLLOWS.**

- 1. Barrick shall provide, on a voluntary basis, [\$\_\_\_\_] to the Ministry to assist in offering additional specific training associated with [ ] at Mine Site.
- 2. It is contemplated that, as part of that training, Barrick shall provide certain technical information and instruction in relation to [ ] as contemplated at Mine Site.
- 3. It also is contemplated that, as part of the training, the Ministry shall authorize the travel of certain selected employees to travel to a mine Site in which [ ] are used in a manner similar to that contemplated at Mine Site. The Ministry shall

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maintain full and complete discretion to select the employees for that travel, the means of travel, and the class of travel. In connection with such travel, Barrick shall assist in providing necessary arrangements, meals, and accommodations, as requested by the Ministry. All such meals and accommodations shall be reasonable in class of service, provided on an in kind basis, and shall be directly related to any official travel as determined by the Ministry. The parties agree that, in connection with such travel, Barrick will not provide any financial support to the officials selected by the Ministry, arrange any side trips unrelated to the training contemplated by the terms of this Agreement, or provide support for travel for individuals other than ministry officials.

4. Other uses of the voluntary support being provided herein shall be agreed upon by the parties, in writing, and appended to this Agreement.
5. The Ministry agrees that the voluntary support being provided herein by Barrick only shall be used as contemplated for training and education in [ ] as being used at Mine Site, and for no other purpose.
6. The Ministry expressly warrants that it and any officials it designates for receipt of the voluntary support being provided by Barrick, including training or travel, are legally authorized to directly accept the support contemplated herein. All requests for voluntary support in addition to that set forth in this Agreement must be approved in writing by the Barrick Office of the General Counsel, Toronto, Canada.
7. The Ministry and Barrick agree that Barrick has no authority at any time to supervise, direct, or control any assignment or function of the Ministry or any of its employees. The voluntary support identified herein is not conditioned on the outcome of any function the Ministry or its employees may perform, or any decision the Ministry or its employees may render. The Ministry and its employees shall not be constrained or influenced by the voluntary support identified herein in performing any official functions, but shall retain full and complete independence at all times. The Ministry and its employees are not, and shall not be, beholden in any respect to Barrick, or any of its employees or affiliates, in any respect. Neither the Ministry, nor its employees, in accepting the voluntary support identified herein, are aware of any other issue that might reasonably create the appearance of a conflict of interest or otherwise cause doubts about the Ministry's genuine independence or the integrity of any decisions it may make. At present, there are no discretionary determinations pending before the Ministry or its employees.
8. The Ministry and Barrick agree that Barrick is providing the voluntary support identified herein for educational and training purposes only, to further the capacity of the Ministry and certain of its employees in overseeing and supervising [ ], and is not providing the voluntary support to unduly or improperly influence, in any manner, any act, decision, or function that the Ministry or its employees may take while acting in their official capacities, and that such support shall not so influence any act, decision or function. No portion of the voluntary support identified herein shall be provided to any third party, including in

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particular any other official, employee, agent, or representative of the [country] or any Ministry or instrumentality thereof, or any family member thereof, or to influence any action by the Government of [country], any Ministry or instrumentality thereof, or any official, employee, agent, or representative thereof.

9. Barrick may terminate its voluntary support under this Agreement, in whole or in part, at any time with a prior notice of three working days. In particular, Barrick shall automatically and immediately terminate support if it is determined to be in violation of any applicable law or that such support subjects it to any sanction or penalty under any law.
10. In the event of death or injury to any employee of the Ministry, or to any third parties, related in any way to the provision of the voluntary support contemplated herein, the Ministry shall indemnify and hold Barrick harmless from and against any and all claims.
11. All support provided under this Agreement shall be recorded by Barrick in writing. Barrick intends to maintain all records relating to any support it provides, and to make such records available to any relevant and duly authorized public authority, which may review them at the registered office of Barrick, upon reasonable notice.
12. All support provided shall be open and transparent, and Barrick may disclose information regarding such support and this Agreement to third parties. The Ministry shall provide reasonable assistance to Barrick to ensure that all support provided in connection with this Agreement is accurately recorded in Barrick's books and records, including by signing receipts and providing certifications verifying that the terms and conditions of this Agreement have been complied with. The Ministry also shall provide reasonable assistance to Barrick, upon its request, to obtain certifications of compliance with the terms of this Agreement from individual employees who may receive support as provided under this Agreement.
13. Neither this Agreement nor the voluntary support identified herein shall create any kind of employment, Ministry or joint venture relationship between Barrick, the Ministry or any of its employees, whether under tax laws, employment laws, or any other applicable law in [country] or elsewhere.
14. If any of the aforementioned conditions are determined to be invalid, illegal or unenforceable in any respect under any applicable law, the validity, legality and enforceability of the remaining terms and conditions shall not be affected or impaired by reason thereof.