



ANTI-FRAUD POLICY

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SCOPE: This Policy 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 reporting requirement of this Policy is also applicable to Barrick's contractors and suppliers. The Policy is not applicable to Acacia Mining, 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
	Code of Business Conduct and Ethics Escalation Procedure

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1. PURPOSE

Barrick Gold Corporation and its subsidiaries (collectively referred to as “Barrick”) are committed to protecting Barrick’s reputation, revenues, assets and information from any attempts of fraud, deceit or other improper conduct by employees or third parties. The Board of Directors of Barrick has adopted a Code of Business Conduct and Ethics (the “Code”) which embodies Barrick’s commitment to conduct its business in accordance with all applicable laws, rules and regulations and the highest ethical standards.

This Policy sets out Barrick’s expectations and requirements relating to the prohibition, recognition, reporting and investigation of suspected fraud, corruption, misappropriation and other similar irregularities.

2. SCOPE

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

This Policy is intended to supplement all applicable laws, rules, and other corporate policies, including the Code. It is not intended to supplant any local laws.

3. DEFINITION OF FRAUD

The term “fraud”, as used in this Policy, refers generally to any intentional act committed to secure an unfair or unlawful gain including, but not limited to, fraud, corruption, misappropriation, theft and other similar irregularities that reflect actual or potential:

- misrepresentation in Barrick’s publicly released financial statements or other public disclosures;
- misappropriation or theft of Barrick’s assets such as gold, money, equipment or supplies;
- unlawfully obtained revenue and assets, or unlawful avoidance of costs and expenses;
- commercial bribery or bribery of a government official or other violation of anti-corruption laws; or
- improper payment schemes such as employees or directors of Barrick seeking or accepting from, paying or offering to, suppliers or business partners, kickbacks or gifts intended to or which may appear to influence business judgment.

4. REPORTING OF FRAUD

Barrick expects all employees to take all reasonable steps to prevent the occurrence of fraud and to identify and report instances of known or suspected fraud (“Fraud Concerns”) committed by or against Barrick, whether by Barrick employees or third parties.

All Fraud Concerns must be reported. The Barrick Code of Business Conduct and Ethics Escalation Procedure provides a framework to ensure that suspected violations of this Policy

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are reported to appropriate levels of management and to the Audit Committee of the Board of Directors of Barrick. Elements of that framework are summarized in this Policy.

As a general guideline, Fraud Concerns should be promptly reported by an employee, contractor or supplier to designated local management in the first instance, unless the employee, contractor or supplier believes that it is inappropriate to do so under the circumstances. Reporting concerns to local management in this manner is often the most effective way to promote an open and positive work environment.

Set forth below are the local management contacts for employees or contractors and suppliers to report Fraud Concerns:

Work Location	Contacts
Mine, country, development project or exploration site	<ul style="list-style-type: none"> • Head of Mine Site / Portfolio Operations • Country Executive Director • Head of Development Project • Head of Country or Regional Exploration • Any In-House Legal Counsel • Head of Country or Site Finance • Head of Country or Site Human Resources • Senior Ethics and Compliance Personnel
Corporate office and all other office locations	<ul style="list-style-type: none"> • General Counsel • Any In-House Legal Counsel • Head of Internal Audit • Head of Human Resources

If reporting a Fraud Concern to designated local management is not possible or advisable for some reason, or if raising a Fraud Concern with local management may/does not resolve the matter, an employee should promptly contact the General Counsel or any Barrick In-House Legal Counsel or report the matter through the Compliance Hotline.

5. FORMAL REPORTING CHANNELS

Barrick has established the following Formal Reporting Channels for employees to report Fraud Concerns. Fraud Concerns may be reported:

- To the General Counsel or any Barrick In-House Legal Counsel, in person or by telephone, through the contact information posted on Barrick's Intranet;
- Through the Compliance Hotline, which can be accessed by telephone or through an Internet portal. To contact the Compliance Hotline, follow the instructions posted on Barrick's Intranet;

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- In the case of matters regarding accounting, internal accounting controls and other auditing matters (in addition to the General Counsel, any Barrick In-House Legal Counsel and the Compliance Hotline), to the Audit Committee, through the Procedures for Reporting Auditing, Internal Accounting Controls and Audit Related Complaints, which are posted on Barrick’s website at www.barrick.com and on Barrick’s Intranet; or
- In the case of matters involving the President or any other senior executive or financial officer of Barrick (in addition to the General Counsel, any Barrick In-House Legal Counsel and the Compliance Hotline), to the Executive Chairman or any other member of the Board of Directors.


6. MANDATORY USE OF FORMAL REPORTING CHANNELS

Fraud Concerns that involve any of the following matters must be reported through one of the Formal Reporting Channels described in Section 5 of this Policy:

- An alleged misstatement in Barrick’s publicly released financial statements;
- An alleged misrepresentation in Barrick’s other public disclosure;
- Any other matter that could reasonably be expected to result in a restatement of Barrick’s publicly released financial statements;
- Alleged bribery of a government official or other alleged violation of anti-corruption laws;
- Known or suspected fraud that involves a potential cost or loss to Barrick exceeding US\$10,000;
- Known or suspected fraud, regardless of amount, that involves an officer of Barrick;
- Known or suspected fraud, regardless of amount, that involves an employee who has a significant role in Barrick’s internal controls;¹ or
- An event or series of events indicative of a deterioration in the overall internal control environment at a Barrick mine site, project development site or office, including a known or suspected incident or repeated incidents which indicate significant or systemic non-compliance with applicable regulatory requirements.

If there is any doubt as to whether a matter falls within a category set out above, one of the Formal Reporting Channels must be used.

¹ Employees who have a significant role in Barrick’s internal controls include employees in a “position of trust” who due to their authority and/or accountability to act on behalf of Barrick have the potential to influence the company’s financial reporting and/or control environment. A listing of employees who are in a position of trust may be obtained from the human resources department.

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7. HANDLING OF FRAUD CONCERNS

The General Counsel is responsible for all Fraud Concerns received through a Formal Reporting Channel and will ensure that prompt and appropriate action is taken in respect of such Fraud Concerns.

Fraud Concerns received by designated local management shall be reported to the Head Country In-House Legal Counsel in accordance with the Code of Business Conduct and Ethics Escalation Procedure. Unless otherwise directed by the General Counsel, the Head Country In-House Legal Counsel is primarily responsible, in coordination with the Country Executive Director and the relevant Head of Mine Site, Head of Development Project, or Head of Country or Regional Exploration, for all Fraud Concerns associated with his or her mine, development project or country office, as the case may be, reported to him or her that do not require mandatory reporting through a Formal Reporting Channel and will ensure, in coordination with the Office of the General Counsel (the General Counsel and her or his designee(s)), that prompt and appropriate action is taken in respect of such Fraud Concerns. In cases of a financial nature, the General Counsel may assign the relevant Head of Country or Site Finance primary responsibility for a concern or complaint.

The General Counsel will report to the Audit Committee of the Board of Directors on Fraud Concerns in accordance with the Code of Business Conduct and Ethics Escalation Procedure.

Prompt and appropriate action will be taken to remediate the circumstances giving rise to an occurrence of fraud.

If appropriate, following consultation with Barrick In-House Legal Counsel, Barrick may report information regarding the reported Fraud Concern and the results of any investigation carried out to law enforcement, regulatory authorities or insurers.

8. CONFIDENTIALITY AND NON-RETALIATION

Every reasonable effort will be made to ensure the confidentiality of the reported Fraud Concern and the identity of those providing information to the extent consistent with the need to conduct an appropriate, fair and thorough investigation. Fraud Concerns may be reported anonymously through the Compliance Hotline. If you prefer to report a Fraud Concern anonymously, you must provide enough information about the incident or situation to allow Barrick to investigate properly.

Barrick will not tolerate retaliatory action against any individual for reporting, in good faith, concerns regarding known or suspected fraud.

9. DISCIPLINARY ACTION

Barrick expects all employees and directors to act in full compliance with this Policy, the Code and other policies of Barrick, and in a manner consistent with the highest ethical standards. An employee or director found to have been involved in fraudulent activity or other misconduct or to have failed to report a known or suspected instance of fraud will be subject to disciplinary action

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up to and including termination. Furthermore, such conduct may also be a violation of the law and may result in civil or criminal penalties for the employee, director and/or Barrick.

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