

ADVANCING WITH OUR PEOPLE.
ADVANCING. TOGETHER.

Code of Business Conduct and Ethics

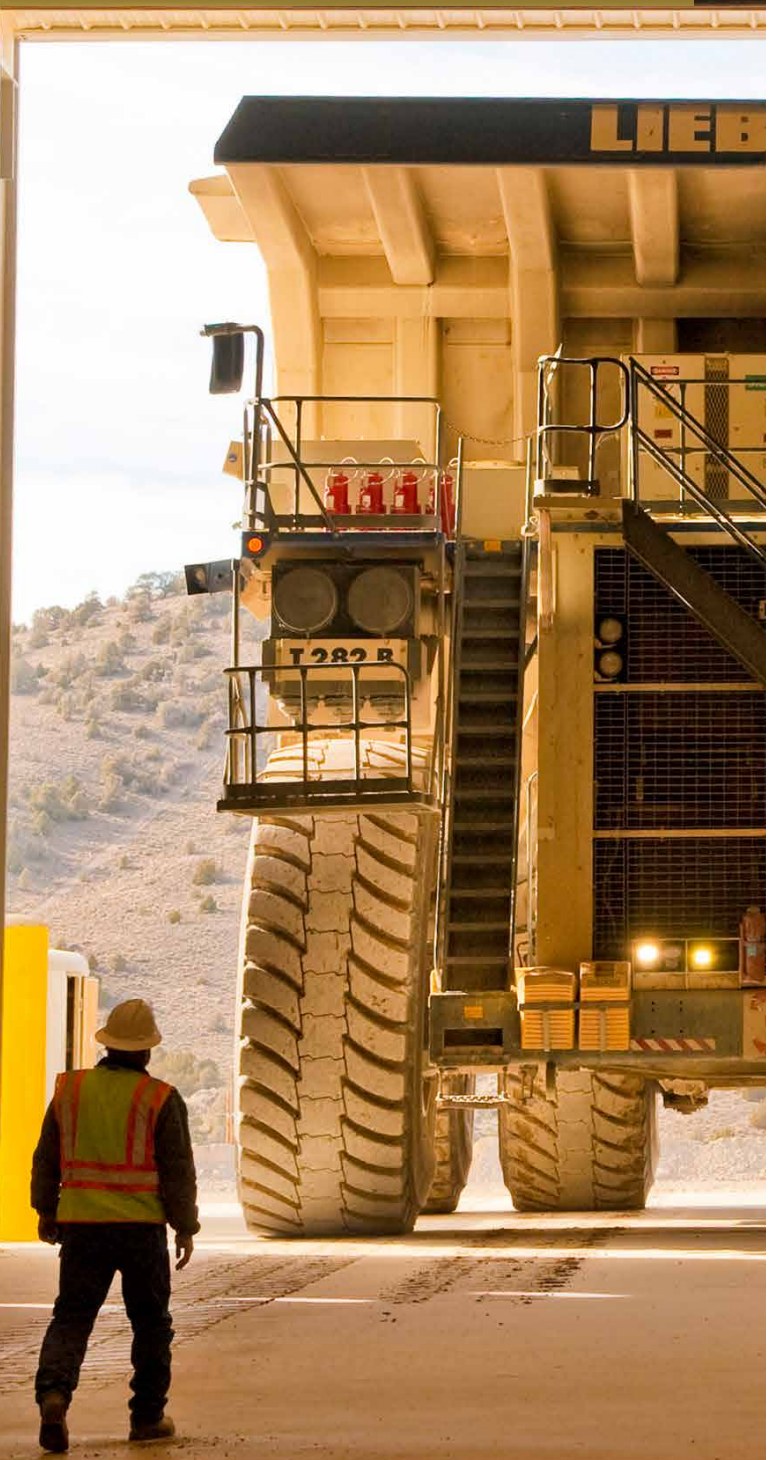


BARRICK

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A Message from Barrick President Kelvin Dushnisky

Barrick's success has been built on a foundation of personal and professional integrity and a commitment to excellence, all underpinned by a partnership culture. As a company and as individuals, we must guide our conduct by standards of honesty, integrity and ethical behavior. It is a pledge we make to each other and to our many partners around the world. It is the essence of our vision of responsible mining.

This Code of Business Conduct and Ethics embodies our commitment to conduct our business according to the highest ethical standards. Whatever your role at Barrick, the judgments you make, and the actions you take, reflect on our reputation and are critical to our success. We count on your leadership and integrity to embrace and drive a culture in which we generate wealth, never compromise our values and principles, and satisfy the laws, industry standards, and international norms in all locations where we operate.

Many of the rules that apply to our work are complex and strictly enforced. For this reason, we expect every employee to ask questions without hesitation and raise concerns so that we are always comfortable with our conduct. And it is the responsibility of every manager, including me, to create an environment where questions and concerns are always welcome, encouraged and addressed.

This Code applies to all of us who work for Barrick, whether you are a director, officer, employee, contractor, or third party vendor. It sets forth core principles that govern our work, and identifies the many resources available to help you understand how these principles relate to your job.

Please take the time to read and understand our Code. Seek answers to any questions. And make sure you are conducting Barrick's business according to the Code and ethical behavior. We will be a stronger, better, and more responsible company as a result, and continue to earn the trust that our community, government and business partners have placed in us.

We thank you for your continued hard work and dedication to Barrick and its success.



A handwritten signature in black ink, which appears to read "Kelvin Dushnisky". The signature is stylized and written in a cursive-like font.

OUR VISION is the generation of wealth through responsible mining – wealth for our owners, our people, and the countries and communities with which we partner. We aim to be the leading mining company focused on gold, growing our cash flow per share by developing and operating high quality assets through disciplined allocation of human and financial capital and operational excellence.

OUR VALUES underpin our daily actions and drive the work that will achieve our near-term priorities and our long-term goals. Our values have one common objective: achieve excellence in all that we do. To realize our objective, we must work as a team and communicate clearly so that every decision is made with a **PURPOSE**.

P PEOPLE
Attract and develop strong people who act with integrity, are tireless in their pursuit of excellence, and inspire others to be their best.

U URGENCY
Act with urgency. Seek out opportunities and determine how to capitalize on them.

R RESPONSIBILITY AND ACCOUNTABILITY
Act as an owner. Take initiative. Own up to mistakes and learn from them. Drive change. Always look for ways to make things better.

P PARTNERSHIP
Earn trust and create transparency to build enduring partnerships between our people and with the countries and communities in which we operate.

O OPERATIONAL EXCELLENCE
Lead the industry in safety and environmental practices – all while unleashing the full potential of all our assets through ingenuity, drive, and innovation.

S SHAREHOLDER VALUE
Allocate money and people to opportunities which grow our free cash flow per share while maximizing our net asset value.

E EXECUTION
Do what we say we are going to do.



What Responsible Mining Means for Us

Understanding Our Code

What is the scope of the Code?

This Code has been adopted by our Board of Directors and applies to every Barrick employee, including the President, other senior executives and financial officers, and members of our Board. Contractors and third party vendors also are expected to meet the standards contained in this Code.

What does the Code encompass?

Being a responsible company means upholding the highest ethical standards and complying with all applicable laws and regulations, industry practices and international norms, as well as this Code and all other Barrick policies or requirements. Those policies include Barrick's [Anti-Fraud Policy](#), [Disclosure Policy](#), [Insider Trading Policy](#), [Anti-Bribery and Anti-Corruption Policy](#), [Human Rights Policy](#), [Safety and Health Policy](#), and [Environmental Policy](#).

If you have questions about the Code, ask your supervisor, your Country Executive Director or General Manager, head of Country or Site Human Resources, or any Barrick In-House Legal Counsel.

What are my responsibilities as an employee or contractor?

Everyone at Barrick has a responsibility to act ethically. As employees, we have a duty to understand and follow the Code and all laws, regulations and company policies that apply to our jobs. We all are expected to conduct business according to the highest ethical standards, and report issues and concerns that we may have. Contractors have a similar expectation when they perform work for Barrick.



Does the code apply to me?

The Code applies to all Barrick directors, officers, employees, contract employees and third party vendors.

Are my responsibilities limited to the Code?

In many cases, local laws may impose additional obligations or limits on Barrick or its employees. In addition, the company, individual sites and functions have policies and procedures that supplement the Code.

While the Code forms a strong foundation for ethical business conduct, it is not a substitute for common sense and good judgment, nor does it address every situation we encounter. If you are ever unsure about what to do in a particular situation, ask yourself:

- Does the action comply with the Code and other Barrick policies?
- Is the action legal?
- Does it feel right and am I comfortable with the decision?
- Am I confident that I don't need to consult anyone else?
- Would the person I respect most support this decision?
- Have I applied the "newspaper test" (e.g., how would it look on the front page)?
- Am I confident our shareholders and external partners would react positively?

If you have any doubts about what's right or what you should do, ask questions and voice your concerns. If you think an actual or potential violation has occurred, it's important to come forward and report your concerns immediately. The end of this Code describes how to report a concern.

Misconduct cannot be justified by saying it was ordered by someone else, even in management. Nobody has the authority to require you to act in a way that is illegal or violates Barrick's policies.

You should also be alert to potential improper conduct, including fraudulent or unlawful activities. That obligation extends to your own functional unit and others, as we all have an obligation to prevent improper conduct from occurring and report it when it does.

What are my responsibilities as a supervisor?

Supervisors must act as leaders. You are expected to demonstrate a personal commitment to Barrick's standards and foster an environment where employees feel comfortable asking questions and reporting issues. Supervisors must also make direct reports aware of their obligations under the Code and the policies and procedures that apply to them.

You are expected to be open to questions about the Code and our policies, and to identify the right resource for employees who have good faith questions or concerns. We advise employees to seek guidance from local management on the best course of action if they have concerns over potential violations of the Code, our policies, or the law. When you are approached, be ready to give honest, ethical and appropriate answers; if you do not have the answer, refer the employee to any Barrick In-House Legal Counsel.



Supervisors are expected to:

Lead with integrity.

Encourage employees to ask questions and voice concerns.

Educate employees on policies specific to their responsibilities.

Act promptly and effectively when ethical questions are raised.

What happens when a report is made?

It is the Legal Department's responsibility to follow up on reports.

When we receive a report of a potential violation of the Code, we investigate it promptly and take corrective action as appropriate based on the findings. We expect all employees to cooperate in investigations fully and candidly. Obstructing an investigation, providing false or misleading information, or failing to cooperate may lead to disciplinary action up to and including termination.

The Legal Department is responsible for promptly addressing all Code allegations and recommending corrective actions to local or head office management, as appropriate. The General Counsel is responsible for allegations that raise the most serious violations of the Code. The General Counsel reports regularly to the Audit Committee of the Board of Directors on serious Code violations and suspected Code violations.



Code-related topics reported to the audit committee include:

- An alleged misstatement in Barrick's publicly released financial statements.
- An alleged misrepresentation in Barrick's other public disclosures.
- 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 violations of anti-corruption laws.
- Known or suspected cases of severe human rights violations.
- 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, which includes members of the Executive Committee, Executive Directors and General Managers, other senior personnel at Barrick, employees who work in the internal audit, finance and accounting or legal functions, and other employees who are designated as holding positions of trust (a list of employees in positions of trust is available from Human Resources).
- 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.



Which employees have a significant role in Barrick's internal controls?

Members of the Executive Committee, Executive Directors and General Managers, other senior personnel at Barrick, employees who work in the internal audit, finance and accounting or legal functions, and other employees who are designated as holding positions of trust. A list of employees in positions of trust is available from Human Resources.

What kind of discipline is there for Code violations?

If employees, contractors, or third party vendors are found to violate the Code, they will be subject to disciplinary action or contractual remedies. The nature of the discipline is determined by several factors, including the seriousness and frequency of the violation, past misconduct, relevant knowledge or intent, and prior training. Common disciplinary actions for employees are:

- Mentoring or counseling
- Focused training
- Verbal warning
- Written warning or reprimand
- Suspension
- Termination

In appropriate cases (for example, reports of serious human rights violations), referrals may be made to law enforcement, and/or repayment or restitution may be sought.

We do not tolerate retaliation, and encourage good faith reporting.

We will not tolerate retaliation by anyone, regardless of their level or position, against an employee, contractor or other third party vendor for raising concerns or questions regarding ethics, or for reporting suspected Code violations in good faith. We take claims of retaliation very seriously and investigate them in the same manner as allegations of Code breaches. Anyone found to be engaging in retaliation may be subject to disciplinary action up to and including termination of employment.

To be clear, we encourage employees to raise concerns, and try to protect those that do. An employee or contractor who in good faith seeks advice, asks a question or reports known or suspected misconduct is doing the right thing. We encourage and expect our workforce to voice concerns and questions.

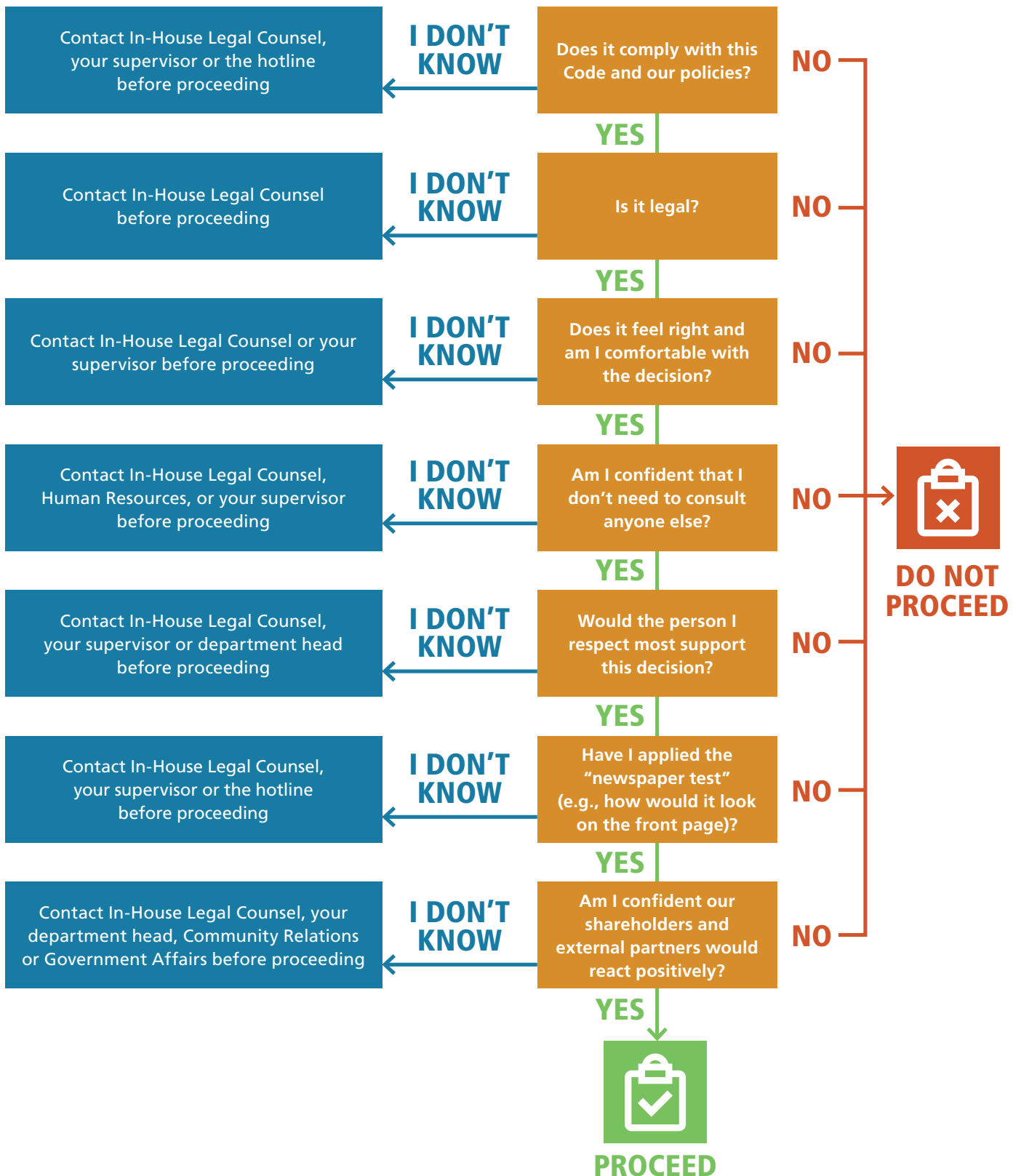
In addition, reasonable efforts will be made to keep any allegations about suspected Code violations confidential throughout the investigation process, taking into account the need to obtain sufficient information to conduct a thorough investigation. If you prefer to report an allegation anonymously through the Compliance Hotline, please provide enough details and information about the incident or situation to allow Barrick to investigate properly. Information about the hotline is posted on Barrick's Intranet and is included at the end of this Code.



Example of Retaliation:

A worker in maintenance has reported a concern that a supervisor may be accepting kickbacks from a supplier of parts. If there is any attempt to remove the worker, change the worker's schedule, terminate the worker, or give the worker a poor evaluation because of the report, it may constitute retaliation and the Legal and Human Resources Departments will make sure that the matter is investigated and appropriate action is taken.

Ethical Decision-Making Guide





Standards of Conduct

Responsibilities To Our Shareholders

Conflicts of Interest

Advancing together means we put the interests of Barrick before our own. We avoid conflicts of interest where someone might question whether we are acting for Barrick's benefit or for personal gain. Conflict situations arise when an employee or director takes actions or has private interests that may make it difficult to perform his or her company work objectively and effectively. These types of situations may cause us to make decisions based on personal gain rather than the best interests of Barrick. They make it appear that we are using our positions at Barrick to obtain an improper personal benefit for ourselves. Where Barrick employees believe they or others may face circumstances that create, or could be seen as creating, a conflict of interest, they should raise the issue with their supervisor, their supervisor once-removed, or Barrick In-House Legal Counsel.

It is important to remember, we respect the right of employees and directors to take part in activities outside of their jobs. These might be financial activities, business activities, or charitable or social activities. When these activities are pursued, they must be free of conflict with responsibilities as Barrick employees and directors. In addition, where employees wish to serve as directors, officers, employees or consultants of a competitor, business partner or potential business partner, they must obtain prior approval of the President or the General Counsel. For Barrick directors in particular, serving as directors or officers of a competitor or business partner, or otherwise professionally engaging with a competitor or business partner, requires prior approval from the Executive Chairman and the Chairman of the Corporate Governance and Nominating Committee of the Board of Directors.

Similar conflict situations can also arise when employees and directors invest or trade in shares of a competitor, or an actual or potential business partner. These kinds of investments may also run afoul of relevant laws. Under our policies, employees and directors generally may not make investments in competitors or actual or potential partners, except for shares of a publicly traded company involving less than five percent of a company's issued shares.



What is a conflict of interest?

A conflict of interest is when there is a perceived, potential or actual clash between two interests. This may be a clash between a personal interest and a professional interest, or two professional interests. When a clash of interests exists, it becomes impossible to fulfill obligations to one party without harming the other. In other words, "you cannot serve two masters."



I have a financial interest in a firm that is a supplier, vendor or competitor to Barrick. Is that a conflict of interest?

Possibly. Contact any Barrick In-House Legal Counsel and you will receive guidance on whether it is appropriate to continue the relationship or establish any precautions.



Gifts

At heart, our business is a partnership. By always looking for ways to create mutual prosperity, we become the trusted partner. This means conducting our business based on sound decisions and fair dealings. The ethical conduct of our suppliers and contractors, as with our employees, is vital to our success. Business gifts and entertainment can build goodwill, but they can also make it harder to be objective about the person who provides them. We must not either ask for or accept any gifts or other benefits from actual or potential business partners, where doing so might impair or be seen to impair our ability to perform our duties in a fair and unbiased manner. Gifts of cash or cash equivalent, such as vouchers, must never be accepted.

Public Disclosure

As we work together to create mutual value with our partners, we also must respect the information our shareholders need to make informed investments in our company. We are committed to providing timely, factual and accurate disclosure of material information about the company to our shareholders, the financial community and the public at large, including in filings with government authorities. Employees and directors are not permitted to make any disclosure of material, non-public information about the company to anyone outside of the company unless it is permitted by our Disclosure Policy, which contains our requirements surrounding public disclosure. If an employee or director believes that the Disclosure Policy has been violated, he or she must notify the General Counsel.



A supplier seeking a contract with Barrick has sent me a gold watch. I did not ask for the watch. What do I do if I have received an unsolicited gift of significant value like this?

It would be appropriate in this situation to return the gift. If there is no failure of good faith on the part of an employee or director in receiving a gift, our policy generally will be to allow the employee or director a reasonable amount of time (e.g., one or two weeks) to correct the situation without disciplinary action. You may wish to contact the General Counsel or any In-House Legal Counsel for guidance. The ultimate decision on how to address third party gifts will be made by the President or the General Counsel, whose primary concern will be the best interests of the company.

Financial Controls and Records

It is vital that we maintain accurate financial records and a system of financial controls. Our financial records serve as a basis for managing our business and helping to fulfill our responsibilities to our shareholders, employees and other partners. The integrity of our financial records is also important to our compliance with accounting, tax, public disclosure laws and regulations and other requirements.

We all have a responsibility to help maintain appropriate accounting and financial records and follow our system of internal financial controls and relevant legal requirements. Whether we are creating company records or receiving documents from third parties, documents should be created in a timely manner, be accurate, be complete, and have reasonable detail of the transaction. This applies to all company records, whether it is an expense report we create or an invoice we receive. Employees with control over company assets and transactions must establish and/or maintain a system of internal controls in their area of responsibility that is designed to (a) prevent unauthorized, unrecorded or inaccurately recorded transactions; and (b) permit the preparation of financial statements according to generally accepted accounting principles or the International Financial Reporting Standards, as appropriate. In addition, mineral reserves and resources must be defined, calculated and disclosed in a manner consistent with applicable laws and regulations and our established procedures.

Insider Trading

Trading on inside information is strictly prohibited and a criminal offense. Inside information is information important enough to potentially affect a company's stock price, but which is not yet public. Examples of inside information include: financial results, earnings projections, changes in senior management, or information about acquisitions, divestments, option agreements or partnership agreements. Inside information may relate to Barrick, as well as other companies, including our contractors and business partners. Consequently, if we have access to inside information about Barrick or one of our business partners, we may not trade in that company's stock (including equity securities, convertible securities, options, bonds and any stock index containing the security), until after the information is made public. Nor may we "tip" others to do so. Trading on inside information, or "tipping" others, is known as insider trading and is a violation of U.S., Canadian, and other laws. We have an Insider Trading Policy to help make sure we comply with these requirements. If you have any questions about the policy or the law, contact the General Counsel.



Examples of questionable accounting or audit matters include:

Fraud or deliberate error in the preparation or audit of any financial statement record.

Deficiencies or non-compliance with the company's internal accounting controls.

Misrepresentation or false statements contained in the company's financial or audit records or reports.

Other deviations from full and fair reporting of the company's financial condition.



I overheard a telephone conversation discussing a big and unplanned shutdown of one of Barrick's mines. I have not heard this before or seen it mentioned by anyone else. Can I tell others at Barrick what I heard?

This may be inside information regarding Barrick that is not generally available to the public and should not be shared with others. If you tell others, and they trade in Barrick stock, you could be violating insider trading laws.

Business Opportunities

Advancing together means protecting and advancing the company's legitimate interests. None of us should compete with the company. We may not take improper advantage of business opportunities discovered through the use of company property, information or position. We are also prohibited from using company property, information or position for personal gain.

Examples of business opportunities include:

- Marketing or selling a process you developed at Barrick.
- Investing in the technology of a third party you meet because of your position at Barrick, in which Barrick also may have an interest in investing.
- Purchasing land near a mine that you hope or expect Barrick will buy as part of expansion efforts.

Protection and Proper Use of Company Assets

Advancing together means protecting company property. Our assets can be physical, such as equipment and vehicles, computers and software, and reports and records. Assets can also be non-physical, such as the company name, trade secrets, banking information, strategies and even our time at work. Protecting our assets from loss, damage, theft, misuse, and waste is the responsibility of every employee because it directly impacts our profitability and our reputation. That includes being prudent in incurring and approving business expenses, working to minimize expenses and ensuring that expenses are reasonable and serve the company's business interests.

Barrick's Anti-Fraud Policy sets out Barrick's expectations and requirements relating to suspected fraudulent activities and misappropriation.

Confidentiality of Information

Information is an asset, and our partners and shareholders depend on our diligence in protecting company assets. We must protect our financial results, our prospects or our technical data just as we protect our equipment. Our business partners likewise depend on our diligence in protecting confidential information that they provide us, and only using that information for its intended purpose. We all need to hold confidential information in strict confidence, which may continue even after our employment ends.

For further details on maintaining confidentiality, see our Disclosure Policy.



Can I use the company's telephone for personal use, or send emails to friends, or search the Internet for reasons other than company business?

Barrick's communication and electronic systems are there primarily for business purposes. Personal communications using these systems should be kept to a minimum. Barrick email, computers, and telephones are company property and may be monitored by the company without notice.



I just hired an employee from a competitor. During a meeting, I noticed that the employee used confidential information from his former employer in a presentation. Is this acceptable?

No. It is improper, and may be illegal, to use confidential information from or about a former employer. Additionally, if you are approached with offers of confidential information or with any information believed to have been obtained illegally or improperly, contact any Barrick In-House Legal Counsel immediately.



Responsibilities to Each Other as Colleagues

Workplace Harassment or Discrimination

Advancing together means following fair employment practices and maintaining a workplace in which all individuals are treated with dignity and respect. We believe in a diverse and inclusive working environment. We see our success as dependent on the full participation of all of our colleagues – regardless of race, gender, age, color, sex, religion, sexual orientation, gender identity or expression, disability, military or veteran status, or other characteristics protected by applicable laws and regulations. We do not tolerate or condone harassment of any sort, including sexual harassment. We also do not tolerate or condone any type of discrimination prohibited by law, by our Human Rights Policy or by our Policy with respect to the Declaration of Fundamental Principles and Rights at Work. For more information about our approach to preventing harassment, see our Global Harassment Standard.



Examples of harassment:

Intimidating or offensive jokes or innuendos.

Offensive or intimidating telephone calls and/or emails.

Displaying or circulating offensive pictures or materials.

Bullying (including physical, social and cyber-bullying).

Unwelcome or unwanted verbal or non-verbal conduct, including physical or verbal assaults, threats, coercion and intimidation.

Knowingly downloading, transmitting, copying, distributing, retrieving or displaying derogatory, discriminatory, threatening or obscene material generated from or shown on a Barrick system (including desktop computers, laptops, Blackberry/Smartphone or Barrick's email system).

Threats or acts of violence and intimidation. Threats, stalking, or even suggestions of violence in the workplace, are all considered violent behavior.

Unwelcome comments, remarks or jokes about a person's gender, sex, or sexual orientation.

Unwanted comments about a person's physical appearance or personal life.



Health and Safety

To grow sustainable, long-term wealth for our company and our partners, we must work together to keep our people safe. Our safety and health vision is that every person will go home safe and healthy every day. Achieving this goal is everyone's responsibility. We are committed to providing a safe and healthy workplace and adequate resources to meet that commitment through training programs, safety incentive programs, and occupational health programs.

If at any time you do not feel that a job can be performed in a safe manner, whether by you or a co-worker or contractor, you have the authority and are expected to stop the job immediately and talk to a supervisor without fear of repercussion.

If a safety incident occurs, make sure it is reported promptly.

We all have a responsibility to maintain a safe working environment by avoiding at-risk behaviors, as well as occupational and health and safety hazards. We also strive to share best practices, near misses, and other practical safety-related information throughout the organization so we can learn from each other and improve our work on the ground.

For further details around our approach to safety and health, see our Safety and Health Policy.



You know the site is behind on production and the shovel operators are now being required to overload trucks to catch up. You question this, but are told by your supervisor it is ok because the trucks are designed to hold more than what is stated in the operator's manual. What should you do?

Report the matter to management or the hotline. This will enable management to evaluate whether the overloading is authorized and all appropriate safety and other considerations have been undertaken. If you ever feel that job duties can't be performed safely, stop and raise your concern.



Responsibilities to Our Communities and Partners

Fair Dealing

The true currency of our business is trust. We extract metals of importance to nations and their people, which means we succeed only if we are partners in transforming these resources for mutual benefit. This means that we act with the highest degree of integrity. We endeavor to deal fairly with our fellow employees and our business partners. We do not seek to take advantage of anyone through manipulation, abuse of privileged information, or any other unfair-dealing practice. We do not pursue deceptive or illegal means of getting confidential information from competitors, or use such confidential information if we obtain it.



I am in a negotiation with a potential contractor for a significant equipment purchase. I invite a former employee of the contractor to dinner and ask him about their confidential negotiating strategy without telling him about the negotiation. May I use that information to my advantage in the negotiation?

Inviting the former employee to dinner and asking about confidential information, without telling the employee about the negotiation, is the kind of action that would constitute unfair dealing. If we obtain confidential information through manipulative practices, we should not use it to our advantage.

Anti-Corruption

Advancing together means that we do not engage in improper, unethical, or questionable business practices. We are subject to a variety of anti-corruption laws that apply to our operations, including Canada's Corruption of Foreign Public Officials Act, the U.S. Foreign Corrupt Practices Act, and others in the jurisdictions where we operate.

These laws prohibit us from paying, offering, or promising anything of value, directly or indirectly, to any third party, including any government official, to obtain an improper advantage or improperly influence an official act or decision related to our business. Our policies also prohibit us from improperly seeking or accepting anything of value to provide an improper advantage to vendors or other business partners.

In meeting our anti-corruption obligations, there are a few important things to keep in mind.

- When we talk about things of value, they can include cash, gifts, promises, meals and entertainment, travel, and hiring relatives of a third party.
- There is no exception for small amounts. Even small payments can violate the law and may be unethical.
- We may encounter intense pressure to make improper payments in countries where extraordinary competition exists for mining opportunities. We should be particularly vigilant not to be tempted by statements that these kinds of practices are common, customary or condoned.
- It is important for all of us to note that our policies prohibit improper payments to any third party, whether they are government officials or in the private sector, and the receipt of improper payments or gifts.
- We have adopted a global anti-corruption compliance program, which includes detailed policies, standards and procedures regarding vendor and employee onboarding. The program also covers authorizations and recordkeeping for certain categories of transactions involving government, public officials, international institutions, political parties and third party intermediaries. These transactions include travel expenses, meals, gifts and entertainment, political donations, and charitable contributions.

All employees should be familiar with our Anti-Bribery and Anti-Corruption Policy, the Procedure for Implementing Barrick's Anti-Bribery and Anti-Corruption Policy, and other related standards and procedures. For additional guidance, or if you have any questions about whether a specific situation falls under our policies, raise the matter promptly with the General Counsel or any other Barrick In-House Legal Counsel.



I am hosting a local government delegation. What resources should I consult?

You should consult the Anti-Bribery and Anti-Corruption Policy and the Procedure for Implementing Barrick's Anti-Bribery and Anti-Corruption Policy. You also should contact the General Counsel or any Barrick In-House Legal Counsel for further guidance.

Does the Anti-Bribery and Anti-Corruption Policy only apply to interactions with government officials?

No. The policy does not only apply to interactions with government officials, since it also includes "commercial bribery." It prohibits us from improperly providing or offering anything of value to a vendor or business partner to obtain an improper advantage, or accepting anything of value in exchange for providing a business advantage to others. This may include, as examples, offering (or accepting) an expensive gift to obtain confidential bidding information, asking a supplier to hire a relative when considering whether to renew the supplier's contract, or selling information about a potential mine expansion to local landowners.

Human Rights

Advancing together means we are committed to acting with respect toward our internal and external partners. At every location that we operate, all of our employees and third parties who provide us with goods or services must respect the human rights of internal and external partners, including the local community. We do not tolerate violations of human rights. We actively seek to improve human rights in the locations in which we operate, prevent negative human rights impacts from occurring, and provide a remedy when they do. We expect our employees, directors, and third party suppliers and contractors to understand and follow our Human Rights Policy and its implementing procedures.

Environmental Practices

Responsible mining means minimizing the impact our operations have on the environment. Sound environmental practices are in the best interests of our business, our employees, our shareholders and the communities in which we operate. We strive at all times to conduct our business in accordance with recognized industry standards, to institute policies that meet or exceed applicable environmental and safety and health laws and regulations, and to continuously look for ways to improve our environmental performance. Goals and benchmarks are established to measure environmental performance. We conduct environmental audits regularly to measure our compliance with our policies. Details around how we strive to meet our commitments are contained in our Environmental Policy.



I overheard two co-workers speaking about the police using excessive force to arrest a trespasser one week ago. What should I do?

You should report what you have heard, which will allow the company to appropriately engage the police and follow up on the matter.



Responsibilities to Comply with the Law and this Code, and Report Non-Compliance

Legal Compliance

It is vital that we respect the legal institutions in every jurisdiction where we do business and follow all applicable laws, rules, and regulations. This is something that applies to all of us, including every director, officer, employee and contractor. It is important that we all understand the laws, rules and regulations that govern our work. If there are any questions, you are encouraged to seek guidance from any Barrick In-House Legal Counsel.

Waivers of this Code

Responsible mining means doing the right thing, no matter what. In seeking to do the right thing, you may feel that it is necessary to seek a waiver of some aspect of the Code. Although rare, waivers may be granted by the General Counsel or the President. When they are granted, they are reported to the Board of Directors or a Committee of the Board.

If an executive officer – including members of the Executive Leadership Team or the General Counsel – wishes to obtain a waiver of some aspect of the Code, the waiver can only be granted by the Board of Directors or a Committee of the Board. Waivers given to executive officers will be disclosed to shareholders as required by applicable rules and regulations.

Annual Acknowledgement of the Code

Once each year, as a condition of employment, you may be asked to acknowledge that you have received Code of Conduct training, understand its rules, and are not aware of any unreported violations of the Code. New employees will sign an acknowledgement that they have received, read and understand the Code, and undertaken relevant training when they start with the company.

These acknowledgements serve to confirm that employees have reviewed and understand the Code, agreed to comply with it and report concerns about Code violations, and that they are unaware of potential actions that run afoul of the Code that have not already been reported.



I am concerned that a Barrick policy is inconsistent with a regulation applicable to the site where I operate. What should I do?

Relevant laws must be followed all the time. If you believe a Barrick policy is not consistent with a law or regulation, contact any Barrick In-House Legal Counsel.

Reporting Code and Non-Code Concerns at Barrick-Operated Sites and Offices

Operating responsibly means reporting potential violations of the law and this Code, and being open to hearing and addressing the complaints and concerns of internal and external partners. We all have a responsibility to prevent a violation of this Code, to identify and raise potential issues before they lead to problems, and to seek additional guidance when necessary. As mentioned, **we will not tolerate retaliation of any sort against employees, contractors or suppliers for raising good faith concerns about violations of the Code or Barrick policies.** We also maintain a procedure for Code related reports to be escalated to appropriate levels of management, including the Audit Committee of the Board of Directors.

Bear in mind, however, that not all reports that we receive involve potential violations of the Code, and therefore they may not be investigated as such. For instance, some reports might involve human resources-related concerns, or complaints by contractors. Reports that do not involve potential violations of the Code are typically referred to the department best suited to address the grievance or concern, such as Human Resources or Supply Chain.

Of course, there may be instances in which you do not know whether your concern violates this Code or a law that applies to our business. As a general guideline, if you have any questions regarding the best course of action in a particular situation, or if you suspect a possible violation of a law, regulation or this Code, you should address the matter promptly with local management.



What are concerns that may not involve violations of the Code, and how should they be reported?

Many of the concerns and questions of those impacted by our business are not potential breaches of this Code. These might include, for example, allegations about a lack of courteous treatment in the workplace and other employment complaints. They may also include general commercial or contracting matters, or grievances by local partners regarding a perceived injustice that may be based on law, contract, explicit or implicit promises, custom, or general notions of fairness. It is important that we learn about these and other similar types of concerns and questions. Raising them with local management is generally the most effective way to promote an open and positive working environment. Many employment and workplace-related concerns can be best addressed by local human resources personnel, and many commercial questions can be best addressed by local supply chain employees. Grievances by local partners may be best lodged with the operational grievance mechanisms that exist at all of our sites and local offices.

Suspected Code Violations

As general guidance, if you do have any concern that the Code may have been violated, it should be reported promptly to local management. Below is a list of local management contacts that are most appropriate to receive suspected Code-related concerns.

WORK LOCATION	CONTACTS
Mine, country, development project or exploration site	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
Head Office and all other office locations	General Counsel Any In-House Legal Counsel Head of Internal Audit Head of Human Resources

There may be various reasons why reporting a concern or complaint to local management is not possible or advisable. Or you may feel that taking a concern or complaint to local management will not resolve the matter, or you are simply uncomfortable raising the issue with local management. In those instances, employees should promptly contact the General Counsel, any Barrick In-House Legal Counsel or report the matter through the Compliance Hotline by telephone or the Internet (barrickgold.ethicspoint.com).



I am uncomfortable reporting a concern I have about an Executive Director to local management.

What should I do?

Contact the General Counsel, any Barrick In-House Legal Counsel, or use the Compliance Hotline.

Suspected Serious Code Violations and Formal Reporting Channels

There are certain suspected violations of the Code that could bring serious consequences, whether legal, reputational, or related to our license to operate. Employees and suppliers are expected to use certain formal reporting channels to report these types of allegations. These are the same categories of issues mentioned previously, on which the General Counsel reports regularly to the Audit Committee of the Board of Directors, and involve serious Code violations and suspected Code violations. Again, they are:

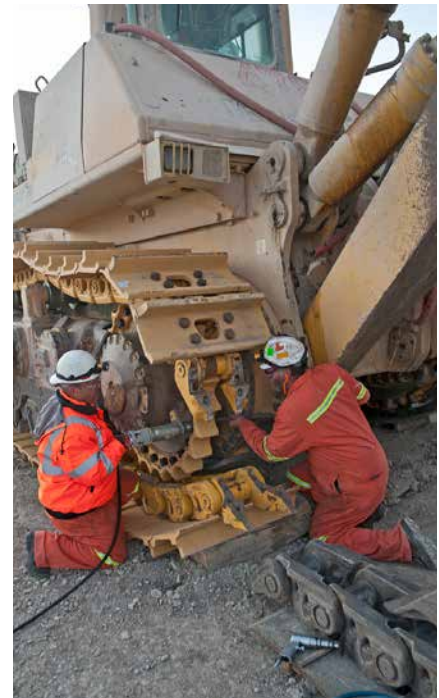
- An alleged misstatement in Barrick's publicly released financial statements;
- An alleged misrepresentation in Barrick's other public disclosures;
- Any other matter that could reasonably be expected to result in a restatement of Barrick's publicly released financial statements;
- Alleged bribery of a government official or other alleged violation of anti-corruption laws;
- Known or suspected cases of severe human rights violations;
- 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, which include members of the Executive Committee, Executive Directors and General Managers, other senior personnel at Barrick, employees who work in internal audit, finance and accounting or legal functions, and other employees who are designated as holding positions of trust (a list of employees in positions of trust is available from Human Resources); 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 described next must be used.



For concerns that fall or which may fall into these categories, employees and suppliers are expected to use one of the following formal reporting channels:

- 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 set out in the next section and posted on Barrick’s Intranet;
- For matters regarding accounting, internal accounting controls and other auditing matters, 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 barrick.com and on Barrick’s Intranet (and to the General Counsel, any Barrick In-House Legal Counsel and the Compliance Hotline);
- For matters involving the President or any other senior executive or financial officer of Barrick, to the Executive Chairman of the Board or any other member of the Board of Directors (and to the General Counsel, any Barrick In-House Legal Counsel and the Compliance Hotline).



NEWS POLICIES & STANDARDS CONTACT US ESPAÑOL

BARRICK

THE CORE

14°C Our Barrick Locations Functions Tools I Want to Ask

Barrick is committed to conducting business in accordance with the highest standards of honesty, integrity, and ethical behavior throughout our global operations.

If you are aware of any violations of the Code of Business Conduct and Ethics or related policies, or see anything that causes you concern, please contact any Barrick in-house counsel or submit a report using [the Compliance Hotline](#). You can use the Compliance Hotline anonymously if you wish.

Global Ethics and Compliance materials and articles are available for you to review at any time.

<p>Compliance Hotline Reporting</p> <ul style="list-style-type: none"> • Compliance Hotline Online • Compliance Hotline – Contact Instructions 	<p>Legal and Compliance Contacts</p> <ul style="list-style-type: none"> • In-house Legal Counsel Contact List • Authorized Approval Employees and Senior Ethics and Compliance Personnel Contact List 	<p>Training Materials</p> <ul style="list-style-type: none"> • Human Rights Training (2015) (PDF) • FCPA Anti-Corruption Training (2015) (PowerPoint)
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The Code of Business Conduct and Ethics, and related policies, standards, and procedures, are available in the Legal section on the [Policies](#) page.

Barrick’s Intranet Ethics & Compliance Page.

Compliance Hotline

The Compliance Hotline can be accessed anonymously to report concerns, taking into account the need to obtain sufficient information to conduct a thorough investigation. The Hotline is:

- A confidential reporting service operated by an outside service provider;
- Available to all employees, as well as contractors and suppliers; and
- Available 24 hours a day, 365 days per year.

Concerns can be lodged through the Compliance Hotline by telephone or via an Internet portal. For the telephone service, operators are available who speak English and Spanish, and interpreters in other languages are also available; the Internet portal is available in English and Spanish.



The screenshot shows the Barrick Compliance Hotline website. At the top left is the Barrick logo. To the right, there are links for "English" and "Español". A notice states: "ATTENTION! This webpage is hosted on EthicsPoint's secure servers and is not part of the Barrick Gold Corporation website or intranet." Below this are navigation links for "Home", "Code of Business Conduct and Ethics", and "Other Policies". The main heading reads "Welcome to Barrick's Compliance Hotline". The text explains that Barrick is committed to ethical standards and provides a confidential reporting service. It includes instructions on how to report a concern or complaint, frequently asked questions, and a follow-up section with a "Report Key" and "Password" field, and a "Log In" button. A disclaimer at the bottom states: "EthicsPoint is NOT a 911 or Emergency Service: Do not use this site to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact your local authorities."

Hotline Follow-up Tool

The Hotline also provides a follow-up tool that allows individuals who report a Code violation to communicate anonymously with those who are investigating his or her report. Through this tool, the reporter can:

- Check on the status of the report;
- Ask questions or add comments; or
- Upload information to support his or her report, such as documents, email messages, pictures, audio or video files.

Likewise, those investigating the report can also post questions or request further information from the reporter on an anonymous basis. The Hotline follow-up tool can be accessed via the same telephone numbers and Internet portal specified below.



For the Internet Portal:

The Compliance Hotline internet portal can be found at: barrickgold.ethicspoint.com.



For the Telephone Service:

In Canada and the United States

Call toll-free by dialing 877-246-5399, or by making a collect call to 503-444-4908.

Outside Canada and the United States

Depending on your location outside Canada and the United States, you can reach the Compliance Hotline in various ways:

- Collect calling (as explained below in Section **A**);
- AT&T toll-free calling (as explained below in Section **B**); or
- Dedicated local number (as explained below in Section **C**).

A: Collect Calling: Make a collect call as follows:

Step 1: Contact your local telephone operator and say you want to place a call to the United States and reverse the charges.

Step 2: Give the operator the phone number: 503-444-4908.

Step 3: You will be connected to the Barrick Compliance Hotline.



Interpretation Service

When submitting a report by telephone, if you do not speak English, or prefer to have an interpreter assist you in speaking with the EthicsPoint representative, please immediately inform the EthicsPoint representative which language you speak. The representative will then begin conferencing in an interpreter if one is available. You will hear music as this happens, so please remain on the line. You will then hear a recorded message in your language to confirm that an interpreter will come on the line shortly. An interpreter will then join your conversation to assist you and the representative in completing the call.

B: Toll-Free Calling: In certain countries, you can reach the Compliance Hotline via AT&T Direct as follows:

Step 1: Make sure you have an outside line (if you are using a public phone, make sure it can be used to make international calls).

Step 2: Enter the AT&T Direct Access Number for the country you are calling from. (You can obtain a current listing of AT&T Direct Access Numbers and detailed dialing instructions at business.att.com/bt/access.jsp.)

Argentina: 0-800-288-5288
0-800-555-4288

Australia: 1-800-881-011 (Telstra)
1-800-551-155 (Optus)

Chile: 800-225-288
800-360-311

Dominican Republic: 1-800-225-5288

Peru: 0-800-50-288
0-800-70-088

Russia: 363-2400 (from within Moscow)

Saudi Arabia: 1-800-10

Step 3: When you hear the English-language voice prompt or series of tone prompts, enter 877-246-5399. (DO NOT press "1" or "0" before dialing this number).

Step 4: You will be connected to the Barrick Compliance Hotline.

C: Dedicated Local Numbers:

Certain sites owned or operated by Barrick have established dedicated local telephone numbers to connect you directly to the Compliance Hotline.

Australia: 08 9212 5788
Perth employees can also call 5788

Dominican Republic: 809-535-0236

Zambia (from site): 5999



Companies and Joint Ventures not Operated by Barrick

Employees of Acacia Mining plc

Acacia Mining plc has a dedicated Compliance Hotline for its employees. The hotline is operated by an outside service provider and is available to all Acacia employees, as well as contractors and suppliers, 24 hours a day, 365 days a year. You may remain anonymous if you wish. The access numbers for the Acacia Compliance Hotline are available on the Acacia Intranet and attached to the Acacia Code of Business Conduct and Ethics.

Employees of Barrick (Niugini) Ltd. (Porgera Joint Venture)

Barrick (Niugini) Ltd. currently uses Barrick’s Compliance Hotline for its employees. It is also available to contractors and suppliers. There are three ways to reach the Compliance Hotline via telephone:

Papua New Guinea:

From an onsite telephone – Porgera or Port Moresby office	Extension 3984
From offsite – local call	544 3984
From offsite – toll free	1805000

Employees of Donlin Gold LLC (Donlin Gold Joint Venture)

Donlin Gold LLC has a dedicated Compliance Hotline for its employees. The hotline is operated by an outside service provider and is available to all Donlin employees, as well as contractors and suppliers, 24 hours a day, 365 days a year. You may remain anonymous if you wish. The access numbers for the Donlin Gold Compliance Hotline are attached to the Donlin Gold Code of Business Conduct and Ethics.

Employees of Ma’aden Barrick Copper Company (Jabal Sayid Joint Venture)

Ma’aden Barrick Copper Company currently uses Barrick’s Compliance Hotline for employees, as well as contractors and suppliers, of the Jabal Sayid Joint Venture. There is a dedicated local number available to reach the Compliance Hotline via telephone from onsite:

Saudi Arabia:

From site	1-800 (the system will automatically complete the collect calling)
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