



## Compliance (LGC)



Code of Business Conduct and Ethics



Barrick success is built on a foundation of integrity and commitment to excellence.



Leading with Integrity



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Policy Summaries



Frequently Asked Questions



Report a Potential Violation



Templates & References



Noticias



Explorar



Alertas



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## ← Frequently Asked Questions

Solicitation and Extortion

Per Diems

Charitable Contributions

Conflict of Interest

Anti-Bribery & Anti-Corruption

Travel, gifts, meals & entertainment

Human Rights - Working together



# ← Report a Potential Violation



## Compliance Hotline Web

24 de ago. de 2018



Report a potential violation or concern



## Compliance Hotline Phone

9 de jul. de 2018



Have a concern?, call the hotline . You can always remain anonymous.



## Compliance Hotline Follow Up Tool

9 de jul. de 2018



Allows to communicate anonymously with the investigators.



## Face to Face



Noticias



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## LEGAL GOVERNANCE AND COMPLIANCE (LGC)

The LGC forms part of Barrick's global governance framework, working in close collaboration with the office of the General Counsel and Country Legal Personnel.

The LGC is a centralized group, with head office resources placed throughout Barrick's global operations with oversight of Barrick's transnational regulatory and compliance programs, investigations and security.

The LGC's ultimate mission is to lead by example and drive a culture of integrity throughout the company.


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— CORE TEAM —



COMPLIANCE OFFICERS



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# CREATING A CULTURE OF INTEGRITY

EVERYONE AT BARRICK HAS A RESPONSIBILITY TO ACT ETHICALLY, LIVING OUR VALUES IN ALL DAILY ACTIVITIES.



## YOU CAN ALSO BE AN INTEGRITY LEADER!

Timbre



### AS EMPLOYEES

- ▶ WE HAVE A DUTY TO UNDERSTAND AND FOLLOW THE CODE AND ALL LAWS, REGULATIONS AND COMPANY POLICIES THAT APPLY TO OUR JOBS.



### AS SUPERVISOR

- ▶ DEMONSTRATE A PERSONAL COMMITMENT TO BARRICK'S STANDARDS AND VALUES. MAKE YOUR TEAM AWARE OF THEIR OBLIGATIONS UNDER THE CODE AND THE POLICIES AND PROCEDURES THAT APPLY TO THEM.



AT BARRICK, WE LEAD WITH INTEGRITY AND EXPECT EVERY EMPLOYEE TO CREATE A CULTURE OF TRUST AND PROACTIVELY IDENTIFY AND MANAGE BUSINESS COMPLIANCE RISK.

- ▶ WE ALL ARE EXPECTED TO CONDUCT BUSINESS ACCORDING TO THE HIGHEST ETHICAL STANDARDS AND REPORT ISSUES OR CONCERNS THAT WE MAY HAVE

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**Our Values, Our Partnership**  
Working with integrity



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LEADING WITH INTEGRITY

## TIPS FOR MANAGERS

Respond immediately and act accordingly

Anticipate ethics and compliance problems and mitigate the risk



Recognize and escalate problems that might create a breach of our policies and standards

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▶ LEADING WITH INTEGRITY

## DO'S AND DON'TS?

### DO'S

#### ▶ REPORT

Report (Write to LGC Team or your legal counsel) any activity, financial interest or relationship that may indicate a violation of Barrick's Policies.

#### ▶ PROTECT BARRICK ASSETS

Protect Barrick Assets, this includes equipment, e-mail, computer applications, printers and other property.

#### ▶ MAINTAIN BOOKS AND RECORDS

Maintain books and records, accurately document expenses, recording individuals involved, the nature and purpose of the expense, and any approvals obtained.

### DON'TS

#### ▶ CONFLICT OF INTEREST

**Do not** engage in business that might favor you or any person whom you might have a close relationship.

#### ▶ OFFER ANYTHING OF VALUE

**Do not** offer anything of value to an employee of another company or a government official for the purpose of obtaining an improper advantage for Barrick.

#### ▶ HOLD FINANCIAL INTEREST

**Do not** hold financial interest in a company or organization where you could personally affect Barrick's business with that company (for example a customer, supplier or investor).

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# COMPLIANCE HOTLINE PHONE



**HAVE A CONCERN?**  
SPEAK UP. YOU CAN ALWAYS  
REMAIN ANONYMOUS.



THE HOTLINE IS A CONFIDENTIAL  
AND ANONYMOUS PLATFORM  
PROVIDED AND ADMINISTERED  
BY A THIRD PARTY.



AVAILABLE 24 HOURS A DAY,  
365 DAYS PER YEAR.



OPERATORS WHO SPEAK ENGLISH  
AND SPANISH ARE AVAILABLE.  
INTERPRETERS IN OTHER  
LANGUAGES ARE ALSO AVAILABLE.

YOU CAN OBTAIN A CURRENT LISTING OF AT&T  
DIRECT ACCESS NUMBERS AND DETAILED  
DIALING INSTRUCTIONS AT  
[business.att.com/bt/access.jsp](http://business.att.com/bt/access.jsp)

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▶ CODE OF BUSINESS CONDUCT AND ETHICS

## SCOPE OF OUR CODE OF CONDUCT



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CODE OF BUSINESS CONDUCT AND ETHICS

## SCOPE OF OUR CODE OF CONDUCT

- 
**ANTI-FRAUD POLICY**  
 Protects Barrick's reputation, income, assets and information from attempted fraud, deception or improper behavior.
- 
**DISCLOSURE POLICY**  
 Ensures that important information is disclosed in a timely, consistent and appropriate manner. Prevents and protects the use of confidential information.
- 
**INSIDER TRADING POLICY**  
 Prevents Barrick's employees from participating in improper securities trading, which could expose them or Barrick to a potential reputational risk.
- 
**ANTI-BRIBERY AND ANTI-CORRUPTION POLICY**  
 Reiterates Barrick's commitment to full compliance with the applicable local and international anti-corruption laws.
- 
**HUMAN RIGHTS POLICY**  
 Guides employees and third parties about their responsibilities regarding respect for human rights at all Barrick operations.
- 
**SAFETY AND HEALTH POLICY**  
 The welfare of our workers and their families is Barrick's top priority.
- 
**ENVIRONMENTAL POLICY**  
 We contribute to the protection of the

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