

## **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 regulat ory 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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# 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 DUTYTO
UNDERSTAND AND FOLLOW
THE CODE AND ALL LAWS,
REGULATIONS AND
COMPANY POLICIES THAT
APPLYTO 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.

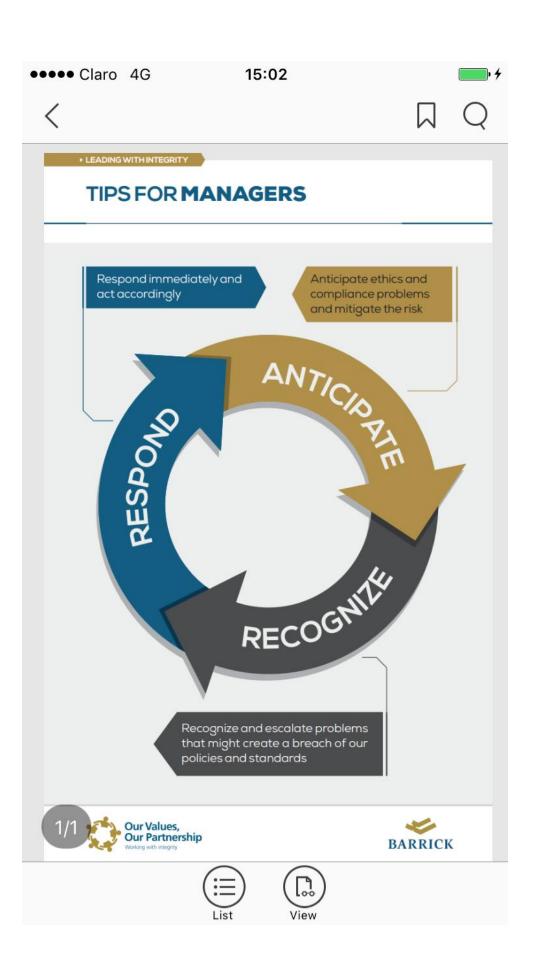
 WE ALL ARE EXPECTED TO CONDUCT BUSINESS ACCORDING TO THE HIGHEST ETHICAL STANDARDS AND REPORT ISSUES OR CONCERNS THAT WE MAY HAVE



















LEADING WITH INTEGRITY

## DO'S AND DON'TS?

## DO'S

## **DON'TS**

#### 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.

## · CONFLICT OF INTEREST

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

## PROTECT BARRICK ASSETS

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

## 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.

## MAINTAIN BOOKS AND RECODS

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

## 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).





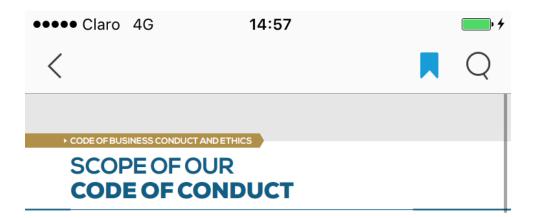


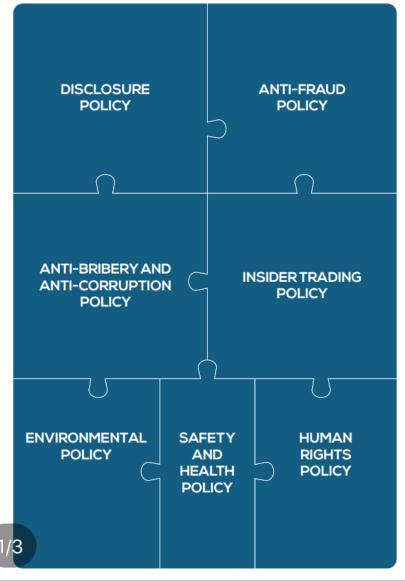
































CODE OF BUSINESS CONDUCT AND ETHICS

# 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



