

## **Ethics and Compliance Program** **2018 Global Communication and Training Plan**

Barrick's success has been built on a foundation of personal and professional integrity and a commitment to excellence. As a company, and as individuals, our conduct must always be guided by standards of honesty, integrity and ethical behavior.

These principles are embodied in our Code of Business Conduct and Ethics as well as the policies and procedures of the Human Rights and Anti-Bribery and Anti-Corruption Programs.

To help employees and third parties fulfill our commitment to these principles, each year we implement an annual training program (live and online) and a communications campaign on the Code of Conduct and the Human Rights and Anti-Bribery and Anti-Corruption Policies.

### **1. General Objectives**

Socialize and internalize among all Barrick employees the global policies and procedures related to the Anti-Bribery and Anti-Corruption and Human Rights Programs. For 2018, the training and communication plans should focus on the following general objectives:

1. Human Rights, including discrimination, harassment and sexual harassment, and vulnerable groups
2. Anti-Corruption, including the importance of maintaining controls and accurate supporting documentation
3. Responsibility to report concerns, formal and other reporting channels, and non-retaliation,

*In addition to the general objectives, each country can include specific objectives to cover based on country needs, laws and local requirements.*

### **2. Requirements / Success Factors**

General and specific objectives shall be measured using the following Success Factors as described in the 2018 Country Action Plan:

#### **2.1 Communications / Tone from the Top**

1. Communications plan exists (for CoC, AC and HR), communications have been disseminated
2. Two global messages (President/COO/CFO) relating to AC and/or Human Rights plus two such messages per country (by GM/ED)
3. >90% completion of the Online Anti-Corruption, Code of Conduct, Human Rights and Reporting Refresher Course completed by Dec 31

#### **2.2 Training**

1. Country training plan exists
2. Country mapping plan exists, conforming to corporate guidance on training
3. A. >90% live AC and Human Rights training per mapping completed by Dec. 31, and B. 90% positive response on SOX question: Do you understand that respect for our stakeholders is a core tenet of Barrick's human rights policy?
4. >90% on SOX question: Are you aware the Anti-Bribery and Anti-Corruption Policy may apply if interacting with government officials?

5. Updated online training and induction video have been rolled out
6. Human Resources & Legal maintain records of training and certifications of employees, including for initial training of new hires and transfers
7. Supply Chain & Legal maintain records of training and certifications of third parties

## 1. **Delivery Methodology**

The Office of the General Counsel will provide reference material and global templates for the implementation of the training plan as well as a logo and reference material for the implementation of the communication plan. Each country may adjust the training materials and create their own communication messages according to their needs and specific objectives.

In addition, Legal teams shall consider and align, wherever possible, their training material and communications with the following delivery methodologies (in addition to other methodologies that may be developed at a local level):

### 1.1 **Communications / Tone from the Top**

#### a) **Compliance News**

- To disseminate through multiple communication channels (emailing, updates on the Core, reports, text messages, quick notes, etc.) messages that contribute to generate awareness related to our Ethics & Compliance culture.
- The message and the channel should be carefully customized to the target audience; finding the appropriate combination of messages and channels for each audience is essential

#### b) **Posters, stickers and/or banners to post at sites and in offices**

#### c) **Compliance Bulletin**

- By using the site/mine physical or digital bulletin boards

#### d) **Use of any other available internal communications platforms and activities as applicable**

### 1.2 **Training**

#### a) **Gamification:**

- Family Feud
- Who wants to be a Compliance Champion? or other game template

#### b) **Pictures and Videos**

- Use of videos and pictures for open discussion to help reinforce Compliance topics and objectives

#### c) **Compliance Champion**

- Motivate and invite employees to become a Compliance Champion by attending live training sessions. Prizes can be given to participants.

#### d) **PowerPoint presentations**

- Focused training for specific guidance or functional areas, as needed and applicable

## 2. Timing

Each country/site shall implement their Training Plan (as per mapping) and Communication Plan no later than Q3. Success Factors shall be accomplished by Dec 31<sup>st</sup>, 2018. If possible, each country/site shall prepare an Activity Schedule or Calendar for these activities and share with the Office of the General Counsel for reference and assistance in reaching these goals.