



## BARRICK GOLD CORPORATION

# GLOBAL WHISTLEBLOWER MANAGEMENT GUIDANCE

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<b>RELATED DOCUMENTS</b>	
	Code of Business Conduct and Ethics
	Anti-Bribery and Anti-Corruption Policy
	Human Rights Policy
	Anti-Fraud Policy
	Policy with respect to the Declaration of Fundamental Principles and Rights at Work
	Procedures for Reporting Accounting, Internal Accounting Controls and Audit Related Complaints
	Code of Business Conduct and Ethics Escalation Procedure
	Procedure for Implementing the Anti-Bribery and Anti-Corruption Policy
	Human Rights Investigation Procedure
	Human Rights Reporting and Escalation Procedure
	Guidance on Reporting Human Rights and Significant Code of Conduct Grievances to the Legal Department

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## **1. PURPOSE**

In accordance with Barrick's Code of Business Conduct and Ethics, the purpose of this Guidance is to identify potential approaches to:

- 1.1 Protect the confidentiality of the identity of any individual who raises a concern or question or reports or provides information regarding ethics matters ("Whistleblowers"), to the extent consistent with the need to conduct an appropriate, fair and thorough investigation and post-reporting event monitoring for an initial period of three years (or any applicable statute of limitations, if it is longer) after the reporting event takes place<sup>1</sup>; and
- 1.2 Implement appropriate follow up and monitoring of Whistleblowers during this initial period ("Initial Period") to identify potential retaliation resulting from reporting concerns, providing information or raising questions in good faith regarding ethics matters.

## **2. SCOPE**

This Guidance is applicable to every office and site where Barrick Gold Corporation exercises operational control. The Guidance is not applicable to Acacia Mining, the Porgera Joint Venture, or to Jabal Sayid, and may not be applicable at other locations in which Barrick holds a significant interest but does not exercise operational control. The Guidance provides approaches that may be considered in helping to protect the confidentiality of identity of Whistleblowers and conduct post-reporting event monitoring to ensure non-retaliation of good faith reports of concerns or ethics matters. Other approaches may, in different locations and in different circumstances, also be appropriate.

This Guidance does not create any right or condition of employment for any individual employee, and may not be relied upon as such. Nor does it encompass third parties or contractors. It provides potential approaches to protect current individual employees who timely and in good faith raise legitimate concerns to company personnel. The applicability of this Guidance in any given situation will depend on a variety of individualized factors and its applicability and interpretation is exclusively reserved to the Office of the General Counsel (OGC). This Guidance's distribution will be limited to the following departments: Legal, Human Resources (HR), Internal Investigations, Mine Security and Investigations Groups, and in the United States, Safety, as per list provided by the Head Office leads of such respective departments. Other employees are made aware of Barrick's Whistleblower guidance, including follow-up and monitoring efforts, through training and our Code of Business Conduct and Ethics.

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<sup>1</sup> Follow up and Monitoring during the Initial Period for an individual Whistleblower may be extended on a case-by-case basis for additional periods as determined appropriate by the Office of the General Counsel, Head Office Human Resources and the Lead Investigator.

Head Office and local Human Resources and Legal Departments will inform General Managers and Executive Directors of the existence of the Whistleblower Database and the approaches outlined in this Guidance.

### **3. IDENTIFYING AND TRACKING WHISTLEBLOWERS**

Where a Whistleblower has either self-identified or their identity otherwise has become known to supervisors, other employees or third parties, the lead investigator (“Lead Investigator”) of the allegation (who may be part of the Human Resources, Investigations, Security or Legal departments), in coordination with the Country Head Legal Counsel or the OGC, as applicable, may promptly provide the employee’s identity to the OGC. The OGC designated personnel may record the name of the employee in a confidential manner, such as in a database (“WB Database”).

OGC will provide access to the relevant information from the WB Database to the respective Lead Investigator, Human Resources Head Office Lead, Country Head Legal Counsel, and the personnel designated by them as required to implement this Guidance, on a “need to know” basis.

### **4. FRAMEWORK – NON-RETALIATION**

The following areas may be subject to follow-ups and monitoring:

- Termination/resignation
- Performance reviews pre- and post-reporting event
- Changes to job duties or employees supervised
- Compensation changes
- Changes to labour conditions to perform job duties, including access to IT systems, databases, workspace, and other aspects of employment
- Discrimination or harassment, including a hostile or intimidating work environment
- Other changes in aspects of employment or workplace treatment that may suggest retaliation

### **5. FOLLOWING UP**

The following approaches shall be considered to maintain continuous communication with Whistleblowers during the Initial Period:

- 5.1 The Lead Investigator, as applicable, will follow up with their respective known Whistleblowers at minimum on an annual basis to determine if that individual has any concerns relating to retaliation. Records of this communication will be stored in the WB Database.
- 5.2 The Lead Investigator, as applicable, will respond to all retaliation-related inquiries made by a Whistleblower in a timely manner. Records of this communication will be stored in the WB Database.

- For non-hotline cases, the Whistleblower can communicate with the Lead Investigator on all retaliation matters via phone, electronic or in-person interactions, at the Whistleblower's discretion.
- For hotline cases in Navex, in addition to phone or in-person interactions at the Whistleblower's discretion, the follow-up tool can be used by the Whistleblower to communicate with the Lead Investigator on these matters while the case is open and for a period of 60 days after the case is closed.

5.3 The Lead Investigator, as applicable, may identify and report to the OGC any grievances from any Whistleblowers regarding their conditions of employment or workplace issues. The OGC in conjunction with the HR Head Office and/or Local Lead (or their designees) may conduct a Code of Conduct investigation and make inquiries with local management to establish whether such grievance reveals any form of retaliation against a Whistleblower or any other form of violation of the Code of Conduct. The OGC and the HR Head Office Lead (or their designees) could also coordinate with local management to implement preventive or corrective actions, as applicable.

## **6. MONITORING**

The following approaches shall be considered to maintain continuous communication with Whistleblowers during the Initial Period:

### **6.1 By the HR Local Lead:**

6.1.1 Establish processes to monitor terminations of any Whistleblowers, report them in writing to the HR Head Office Lead and the OGC, and obtain their prior approval before implementing such terminations. The OGC in conjunction with the HR Head Office Lead (or their designees) might make inquiries with local management to establish the reason and justification for termination. The OGC and the HR Head Office Lead (or their designees) may conduct an exit interview with Whistleblower and oversee the implementation of preventive or corrective actions, as applicable or feasible.

6.1.2 Strive to implement within a target time frame – to be communicated to and approved by the HR Head Office Lead and OGC – the following ongoing monitoring tasks:

6.1.2.1 Identify all pre-reporting event performance assessments related to the identified Whistleblower and establish a performance baseline. Post-reporting event assessments might be monitored by the HR Local Lead to determine whether any unusual changes are occurring, and if so, notify the Local Legal Lead, HR Head Office Lead and OGC. Local Legal Lead, in conjunction with the HR Local Lead (or their designees), might make inquiries with local management for the changes identified and oversee the

implementation of preventive or corrective actions, if they determine that there has been any negative impact on performance assessments post-reporting event.

6.1.2.2 Monitor on a periodic basis whether the Whistleblower has had any change to his or her job duties, job location or other labour conditions, and if so, notify the OGC. The OGC in conjunction with the HR Local Lead (or their designees) might make inquiries with local management for the changes identified and oversee the implementation of preventive or corrective actions, if they determine that there has been negative impact on job duties, location or other labour conditions post-reporting event.

6.1.2.3 Check year end compensation recommendations and statements of Whistleblowers to establish whether there have been any unusual changes of salary or bonus payments, and if so, notify the OGC. The OGC in conjunction with the HR Local Lead (or their designees) might then make inquiries with local management for the unusual changes identified and oversee the implementation of preventive or corrective actions, if they determine there have been negative impacts on salary or bonus payment post-reporting event.

## 6.2 By OGC:

Identify and report to the HR Head Office Lead any Code of Conduct related report or concerns received through formal reporting channels, Lead Investigator or local management that relates to any potential retaliation to Whistleblowers. The OGC in conjunction with the HR Head Office and/or Local Lead (or their designees) may conduct a Code of Conduct investigation and make inquiries with local management to establish whether the identified violation of the Code of Conduct report or concern reveals any form of retaliation against a Whistleblower. The OGC and the HR Head Office/Local Lead (or their designees) could also coordinate with local management to implement preventive or corrective actions, as applicable.

## 6.3 By HR Head Office Lead and OGC:

6.3.1 Report to the President of Barrick, the Executive Vice President, Talent Management and the Audit Committee of the Board of Directors if they determine that a Whistleblower has been subjected to any form of retaliation resulting from reporting concerns, providing information or raising questions in good faith regarding ethics matters.

6.3.2 Develop Key Performance Indicators which should include a component relating to the number of reviews and assessments performed on local Whistleblowers annually.

The President of Barrick and the Executive Vice President, Talent Management may consider appropriate the implementation of disciplinary measures, up to and including termination, for any Barrick employees, Officers, Directors or Contractors involved in any form of retaliation to Whistleblowers.

End of Document.

**APPENDIX: Summary of Responsibilities**

Function / Role	Phase		
	Identifying / Tracking	Following Up (during Initial Period)	Monitoring (during Initial Period)
Lead Investigator	<ul style="list-style-type: none"> <li>Provide Whistleblower (WB) employee identify to OGC</li> </ul>	<ul style="list-style-type: none"> <li>Follow up with respective WBs at minimum once a year to determine if any concerns about retaliation</li> <li>Respond to retaliation-related WB inquiries in a timely manner</li> <li>Store records of follow up communication and responses in WB Database</li> <li>Identify and report to OGC any WB grievances related to conditions of employment or workplace issues</li> </ul>	
OGC	<ul style="list-style-type: none"> <li>Record WB identify in WB Database</li> <li>Provide access to relevant WB Database info to respective Lead Investigator, HR Head Office Lead, Country Head Legal Counsel, others on need to know basis</li> </ul>	Investigate potential retaliation revealed during follow-up and or monitoring: <ul style="list-style-type: none"> <li>Identify and report to HR Head Office Lead any CoC-related reports that relate to potential retaliation to WBs.</li> <li>As appropriate, conduct investigation in conjunction with Head Office HR Lead and/or Local Lead (or designees) and inquire with local management to establish whether retaliation took place</li> <li>Coordinate with local management in conjunction with Head Office HR /Local Lead (or designees) to implement preventive or corrective actions as applicable</li> </ul>	



Function / Role	Phase		
	Identifying / Tracking	Following Up (during Initial Period)	Monitoring (during Initial Period)
OGC and HR Head Office Lead (or designees)			<ul style="list-style-type: none"> <li>• If a WB termination is reported, inquire with local management to establish reason/justification and provide approval of disapproval to HR Local Lead               <ul style="list-style-type: none"> <li>• Conduct WB exit interview</li> </ul> </li> <li>• If unusual changes to post-reporting event performance assessments, inquire with local management about changes</li> <li>• If changes to job duties or other labour conditions, inquire with local management about changes</li> <li>• If unusual changes to salary or bonus payments, inquire with local management about the changes</li> </ul>
		<ul style="list-style-type: none"> <li>• <b>If negative impacts are determined to have occurred post-reporting event, oversee implementation of preventive or corrective actions as applicable / feasible.</b></li> <li>• Report to President of Barrick, EVP Talent Management, and Audit Committee if determined a WB has been subjected to any form of retaliation resulting from reporting concerns or providing information about ethics matters in good faith</li> <li>• Develop annual KPIs that include a component for number of reviews and assessments performed on local WBs</li> </ul>	

Function / Role	Phase		
	Identifying / Tracking	Following Up (during Initial Period)	Monitoring (during Initial Period)
HR Local Lead			<ul style="list-style-type: none"> <li>• <b>Report</b> any <b>WB terminations</b> in writing to HR Head Office Lead and OGC <b><u>to obtain approval before implementing</u></b></li> <li>• Prepare an action plan (and obtain approval from OGC and HR Head Office Lead) for the implementation of the following tasks: <ul style="list-style-type: none"> <li>• Identify pre-reporting event assessments of WB to establish performance baseline</li> <li>• Monitor post-reporting event assessments for unusual changes – if so, notify Local Legal Lead, HR head Office Lead and OGC</li> <li>• Periodically monitor if any unusual changes to WB job duties, location or other labour conditions and if so, notify OGC</li> <li>• Monitor year-end compensation recommendations and report any unusual changes in salary or bonus payments to OGC</li> </ul> </li> </ul>
Local Legal Lead and HR Local Lead (or designees)			<ul style="list-style-type: none"> <li>• Inquire with local management regarding any unusual changes identified in WB performance assessments above</li> <li>• Oversee implementation of preventive or corrective actions if negative impact to performance assessments has been identified</li> </ul>
President of Barrick and EVP of Talent Management		<ul style="list-style-type: none"> <li>• Consider implementation of appropriate disciplinary measures up to and including termination for any Barrick employee, officer, director or contractor involved in any form of retaliation against WBs</li> </ul>	