



**Introduction to Barrick's Code of Business Conduct and Ethics, Anti-Bribery and Anti-Corruption Policy and Human Rights Program**

# Learning Objectives

In the next few minutes, you will learn about:

- The standards of conduct covered by the Code of Conduct
- The payments and actions that are covered by Barrick's Anti-Bribery and Anti-Corruption Policy
- The human rights covered by Barrick's Human Rights Policy
- The consequences of a failure to comply with these policies and the law
- How to report suspected violations of these policies

Personnel are held to the highest ethical standards. It is your duty to report any suspected violations of these policies promptly to management.



# Code of Business Conduct and Ethics

The Code of Conduct sets out standards of conduct on a range of subjects, including:

- Corrupt practices;
- Respect for human rights;
- Avoiding conflicts of interest;
- Preserving confidentiality;
- Compliance with law;
- Accounting and auditing matters;
- Protecting company assets and information;
- Environmental, health and safety practices; and
- Harassment and discrimination.



[\*\*\*Click to see the Code of Business Conduct and Ethics\*\*\*](#)

Violations of the **Code of Conduct** by Barrick personnel may lead to disciplinary action, up to and including termination.

Conduct that violates the Code may also violate the law.



# Reporting a Code Violation

As a general guideline, if you have any questions about the Code of Conduct, you should address the matter promptly with your designated local management contacts.

Work Location	Contacts
Mine, country, development project or exploration site	<ul style="list-style-type: none"><li>• Head of Mine Site / Portfolio Operations</li><li>• Country Executive Director</li><li>• Head of Development Project</li><li>• Head of Country or Regional Exploration</li><li>• Any In-House Legal Counsel</li><li>• Head of Country or Site Finance</li><li>• Head of Country or Site Human Resources</li><li>• Senior Ethics and Compliance Personnel</li></ul>
Corporate office and all other office locations	<ul style="list-style-type: none"><li>• General Counsel</li><li>• Any In-House Legal Counsel</li><li>• Head of Internal Audit</li><li>• Head of Human Resources</li></ul>

The Compliance Hotline is a confidential service operated by an outside service provider.

You can contact the hotline anonymously if you wish.

We encourage and expect you to report possible violations of the Code of Conduct. We will not tolerate retaliatory action against anyone for raising concerns in good faith.



[\*Click to see the Compliance Hotline Telephone and Internet Contact Information\*](#)

# Observing Anti-Corruption Laws Worldwide

- Two anti-corruption laws most relevant to Barrick on a worldwide basis:
  - The Foreign Corrupt Practices Act (FCPA)
  - The Corruption of Foreign Public Officials Act (CFPOA)
- The FCPA and other anti-corruption laws apply to Barrick and all of its employees everywhere in the world.
- Under the FCPA and other anti-corruption laws, it is illegal to give or offer anything of value to a government official in order to obtain an improper advantage for Barrick.



# Anti-Bribery and Anti-Corruption Policy

- Barrick's policy prohibits:
  - paying, offering, or promising
  - anything of value
  - directly or indirectly
  - to any government official
  - for the purpose of influencing a decision related to obtaining an improper advantage for Barrick



[\*Click to see the Anti-Bribery and Anti-Corruption Policy\*](#)



# What are Bribery and Corruption?

Bribery is:

The offer, promise, or payment of something to a person to influence his or her decisions in order to gain an improper advantage.

Corruption is:

The misuse of public power for private profit, or the misuse of entrusted power for private gain.

Bribery and corruption can include:

- Cash payments;
- Phony jobs or “consulting” relationships;
- Kickbacks;
- Political contributions;
- Charitable donations;
- Social benefits; or
- Excessive travel, gifts, hospitality, and reimbursement of expenses.

# Dealing with Governments

When working with or making payments to:

- A government entity or official or,
- A third party that will interface with a government entity or official

you must consult with any Barrick In-House Legal Counsel and follow the Procedures for Implementing Barrick's Anti-Bribery and Anti-Corruption Policy.



# Dealing with Governments

The Procedures cover the following kinds of payments:

- Business travel;
- Incidentals for government officials;
- Direct monetary government support;
- In-kind support;
- Per diems;
- Meals, gifts and entertainment;
- Donations, contributions and cultural events;
- Contracts with governments, officials or third parties interfacing with officials for Barrick; and
- Facilitating payments.



[\*\*Click to see the Procedures for Implementing Barrick's Anti-Bribery and Anti-Corruption Policy\*\*](#)

# Facilitating Payments

- A facilitating or “grease” payment is a payment paid to a government official to expedite a lawful routine transaction.
- These payments are generally prohibited under anti-corruption laws.
- **Facilitating payments are prohibited under Barrick’s Anti-Bribery and Anti-Corruption Policy.**



# Commercial Bribery

- The Anti-Bribery and Anti-Corruption Policy also prohibits commercial bribery.
- You should not offer or provide anything of value to an employee of any company for the purpose of obtaining an improper advantage for Barrick.
- You should not accept bribes that induce you to act against Barrick's interests.

Examples of commercial bribery are:

- Bribing another company's employee to terminate a contract with a competitor in order to work on a Barrick project instead; or
- Bribing an employee of another company to disclose confidential information to you.



- U.S. and Canadian authorities are increasingly focused on enforcement of **anti-corruption** laws
- Violations can result in severe consequences
- For Individuals:
  - Employment consequences: discipline, up to and including termination
  - Legal consequences: fines or imprisonment
  - Reputational consequences
- For Barrick:
  - Legal consequences: fines, government investigations and costly litigation
  - Reputational consequences: affects Barrick's reputation with stakeholders and its social license to operate



# Reporting a Violation

If you have information about a potential violation of **anti-corruption laws or Barrick's Policy**, you must report it.

To report a violation, please contact:

- A designated local management contact;
- The Compliance Hotline; or
- The General Counsel or any Barrick In-House Legal Counsel.

Work Location	Contacts
Mine, country, development project or exploration site	<ul style="list-style-type: none"><li>• Head of Mine Site / Portfolio Operations</li><li>• Country Executive Director</li><li>• Head of Development Project</li><li>• Head of Country or Regional Exploration</li><li>• Any In-House Legal Counsel</li><li>• Head of Country or Site Finance</li><li>• Head of Country or Site Human Resources</li><li>• Senior Ethics and Compliance Personnel</li></ul>
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[Click to see the Compliance Hotline Telephone and Internet Contact Information](#)

- Barrick respects the human rights of its employees and stakeholders.
- Barrick does not tolerate human rights violations committed by:
  - Employees;
  - Affiliates; or
  - Any third parties acting on its behalf or related to any aspect of a Barrick operation.

[\*Click to see the Human Rights Policy\*](#)





# Human Rights under Barrick's Human Rights Policy

What is a violation of human rights?

Some examples:

- Physical abuse;
- Labor abuses;
- Violation of property rights;
- Violation of personal rights;
- Discrimination; and
- Environmental damage.

Human rights are recognized in the United Nations International Bill of Human Rights



- In most cases violations of **human rights** violate domestic laws
- Violations of human rights can result in severe consequences
- For Individuals:
  - Employment consequences: discipline, up to and including termination
  - Legal consequences: fines, damages and/or imprisonment
  - Reputational consequences
- For Barrick:
  - Legal consequences: fines, damages and/or imprisonment
  - Reputational consequences: affects Barrick's reputation with stakeholders and its social license to operate



# Reporting a Human Rights Violation

- If you have information about a potential **Human Rights** violation, you must report it.
- Even a rumor that you don't know to be true is enough to make a report.
- Failure to report can lead to discipline or termination.



# Reporting a Human Rights Violation

To report a human rights violation, please contact:

- A designated local management contact;
- The Compliance Hotline; or
- The General Counsel or any Barrick In-House Legal Counsel.

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## ***Key Points:***

- The Code of Conduct requires you to guide your conduct by the highest standards.
- Don't pay bribes and report any suspected bribes immediately.
- If you are working with government officials, directly or through third parties, consult the Anti-Bribery and Anti-Corruption Policy, Procedures and In-House Legal Counsel for guidance.
- Barrick does not tolerate human rights violations. Any known or suspected violation must be reported immediately.
- The consequences of violating human rights or anti-corruption laws, including not reporting violations, can be severe.



You've completed Barrick's Introduction to the Code of Conduct and Ethics, Anti-Bribery and Anti-Corruption Policy and the Human Rights Policy, and will now be asked to complete a training Acknowledgement and Certification.

If you have any questions on the Code of Business Conduct and Ethics, Anti-Bribery and Anti-Corruption Policy or the Human Rights Policy, contact your Local In-House Counsel.

***By following these policies, you will play an important role in maintaining our good reputation and our social license to operate.***

***Acting with integrity is our goal. Thank you for playing your part.***

