

Driven by Returns

BARRICK



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Meetings with Government Officials

Interactions with Government Officials

Interactions with government officials may...

- Have many different formats
 - In person (in their offices, at site, offsite)
 - Telephone calls
 - Emails or texts

- Differ in format and significance
 - Formal or informal
 - Scheduled or unscheduled
 - Planned or unplanned
 - Routine or non-routine
 - With senior personnel or lower level bureaucrats

Interactions with Government Officials

You may (or should) have a concern...

- With the integrity of the government official
 - Reputation of the official or agency
 - Past practice
 - Sensitive issue being discussed
 - Questions raised by other companies

- That for any reason an official
 - May ask for an improper benefit, directly or indirectly
 - May later claim that you engaged in improper behavior

Interactions with Government Officials

If you have any concerns about an interaction with an official...



- Good practice is:
 - Have a second person join any meeting, call or conversation, where you can
 - Take notes during the meeting or conversation (or save any texts)
 - Document or minute the meeting, consider including:
 - Date and location of meeting
 - Participants (government officials and their titles, Barrick employees, third parties)
 - Purpose of the meeting and key points
 - Key decisions or promises made at meetings
 - Distribute the document or minutes to your superior
 - Documents reflecting communications with senior level officials, or where significant commitments are made, should be provided to the VP Government Affairs, Chief Sustainability Officer or President of the Company (in addition to your local management communications)
 - Retain the document in non-email format in case it becomes relevant later (e.g., for 5 years)

If an improper request is made, contact any Barrick in-house counsel immediately