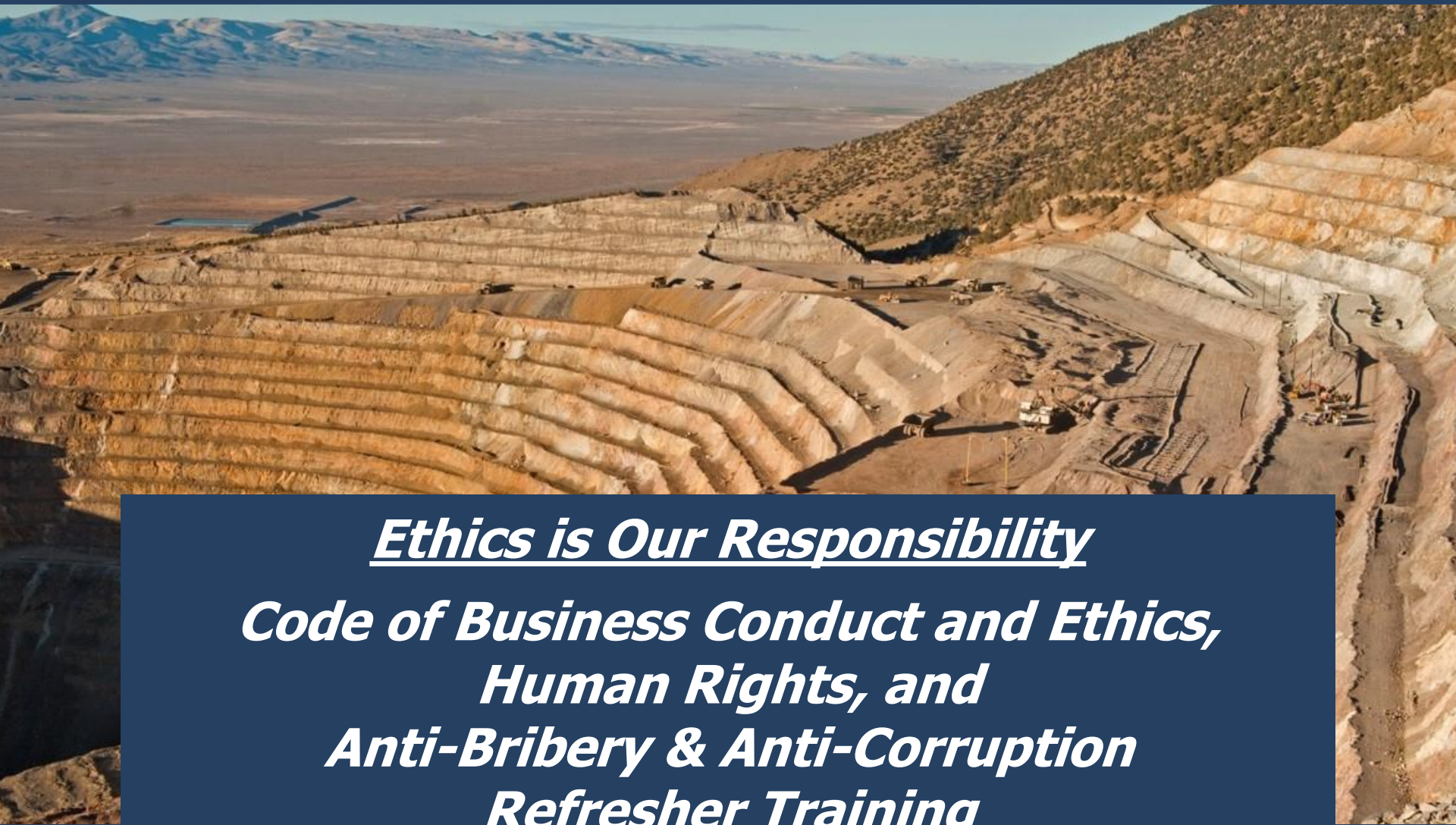




BARRICK

Welcome and Navigation



Ethics is Our Responsibility

***Code of Business Conduct and Ethics,
Human Rights, and
Anti-Bribery & Anti-Corruption
Refresher Training***



Advancing. Together.

Our vision for Barrick is to be recognized as a leading 21st century company, but we will only succeed if we are inclusive, collaborative, and always striving to “do the right thing.” We rely on the trust of each other and our host communities, governments, suppliers, and other partners. How we behave builds this trust and sets us apart.

Everyone at Barrick has a responsibility to act ethically and conduct business according to the highest standards, including contractors who perform work for Barrick.

Barrick counts on your leadership and integrity to embrace and drive a compliance culture in which we generate wealth, never compromise our values and principles, and satisfy the laws, industry standards, and international norms in locations where we operate.



Kelvin Dushnisky
President



Nobody has the authority to require us to act in a way that is illegal or violates Barrick policies in order to “get the job done.”

If you are ever unsure or feel that our Code is being violated, never hesitate to speak up – talk to your local management, the Legal Department, or contact our Compliance Hotline.

We will not tolerate retaliation by anyone, regardless of their level or position, against an employee, contractor or other third party vendor for raising in good faith concerns or reporting suspected Code violations.

Our continuing commitment to ethical behavior and zero tolerance for retaliation have been emphasized in the updated **Code of Business Conduct and Ethics** issued in March 2017, along with new features of the Compliance Hotline, to reassure us about the confidentiality and handling of our reports.

Ethics is everyone’s responsibility.

Thank you.



Kelvin Dushnisky
President



This refresher training is provided company-wide to ensure the Code is understood and supported in Barrick's culture and among all of us as employees.

In each section that follows, we will focus on some key concepts for each policy – however, the Code and related policies are not limited only to these topics. Please also use the links provided throughout the course to access and read these policies in full.

In particular, we will review:

- Your responsibility to comply with the Code of Conduct and related policies and procedures;
- How to use the Code of Conduct to guide you in making ethical decisions;
- How to recognize the importance of human rights and anti-corruption compliance;
- How to report a concern; and
- How to use the hotline to report and follow up **anonymously** on a concern.



BARRICK



Code of Business Conduct and Ethics



The Barrick Code Of Business Conduct and Ethics applies to all of us who work for or with Barrick, whether you are a director, officer, employee, contractor, or third party vendor. It sets forth core principles that govern our work, and identifies the many resources available to help you understand how these principles relate to your job.

If you haven't yet read the Code of Business Conduct and Ethics or the Anti-Fraud Policy, please use the links below to open them on your computer. You can read them in after completing the training.

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

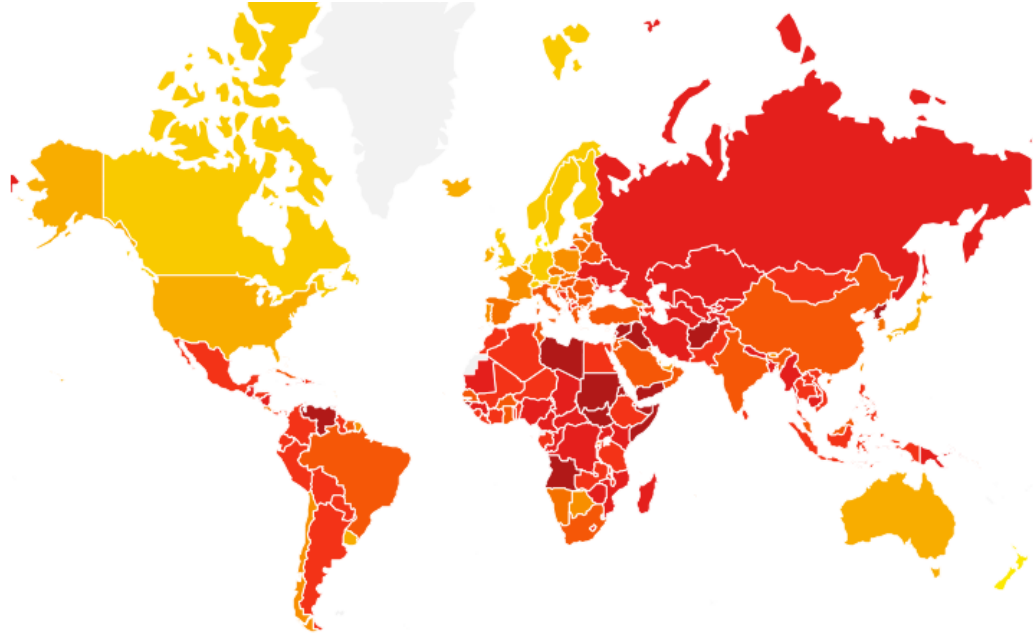
[*Click to view the Anti-Fraud Policy*](#)



Due to the global nature of our business and the extractive industry as a whole, Barrick operates or has joint venture (JV) operations in some countries where there is a medium or high risk of Corruption or Human Rights violations, as indicated in the maps at right.

For example, in 2016 Argentina, Dominican Republic, Papua New Guinea, Peru and Zambia were considered high risk jurisdictions for corruption (source: Transparency International), while the Dominican Republic, Papua New Guinea, Peru, Saudi Arabia and Zambia were considered high risk jurisdictions for human rights (source: Verisk Maplecroft).

2016 Corruption Perceptions Index (Transparency International)



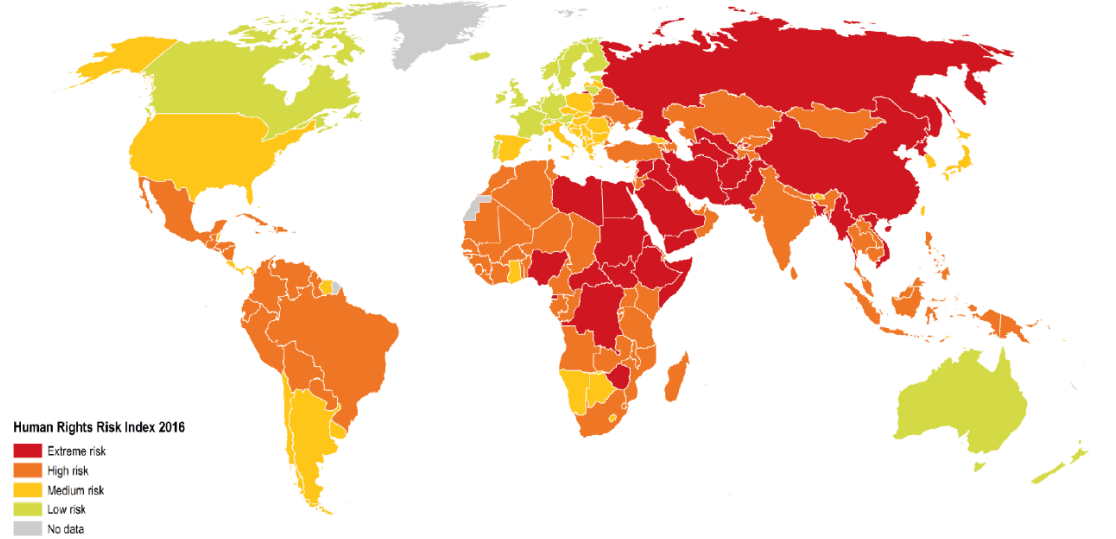
Argentina: High Risk (36)	Papua New Guinea: High Risk (28)
Canada: Low Risk (82)	Peru: High Risk (35)
Chile: Medium Risk (66)	United States of America: Low Risk (74)
Dominican Republic: High Risk (31)	Zambia: High Risk (38)
Kingdom of Saudi Arabia: Medium Risk (46)	



Due to the global nature of our business and the extractive industry as a whole, Barrick operates or has joint venture (JV) operations in some countries where there is a medium or high risk of Corruption or Human Rights violations, as indicated in the maps at right.

For example, in 2016 Argentina, Dominican Republic, Papua New Guinea, Peru and Zambia were considered high risk jurisdictions for corruption (source: Transparency International), while the Dominican Republic, Papua New Guinea, Peru, Saudi Arabia and Zambia were considered high risk jurisdictions for human rights (source: Verisk Maplecroft).

Q4 2016 Human Rights Risk Index (Verisk Maplecroft)



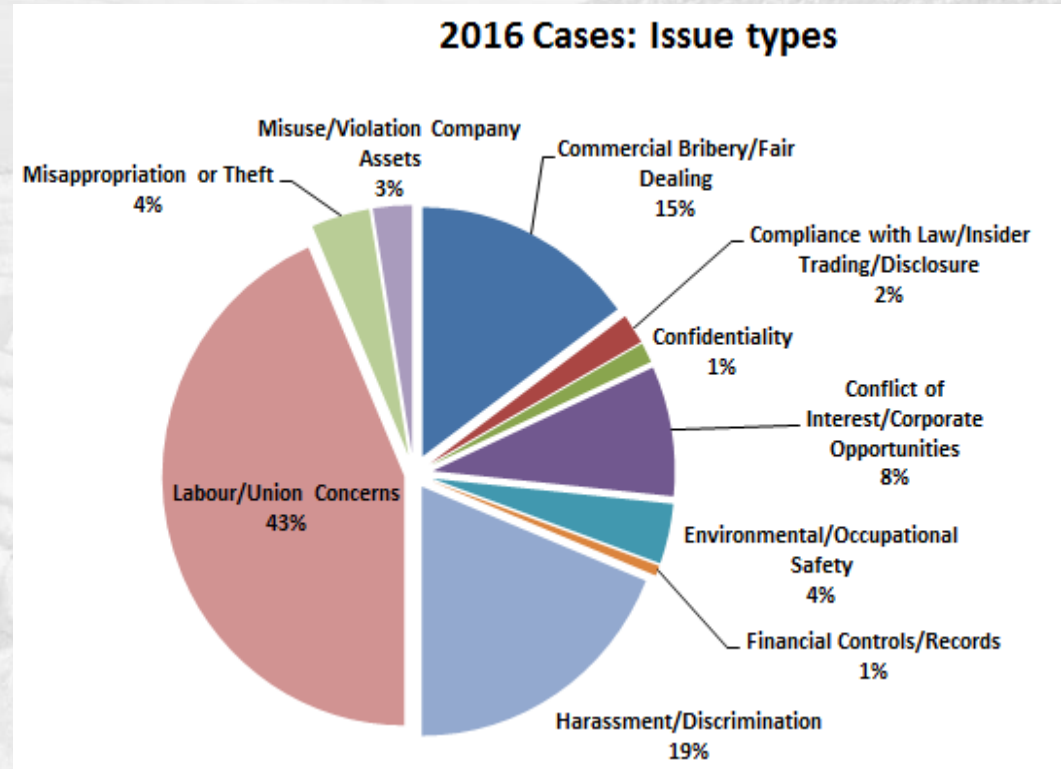
Argentina: Medium Risk
Canada: Low Risk
Chile: Medium Risk
Dominican Republic: High Risk
Kingdom of Saudi Arabia: Extreme Risk

Papua New Guinea: High Risk
Peru: High Risk
United States of America: Medium Risk
Zambia: High Risk



In 2016, for sites operated by Barrick:

- **Over 150 reports were made on the issues at right;**
- **Over 130 reports were resolved,** including some reports received prior to 2016;
- **Of resolved reports, almost half were substantiated or partially substantiated and resulted in disciplinary actions** or changes in our policies and procedures; and
- All reports were addressed by the Office of the General Counsel and others as applicable. Code of Conduct reports are also presented quarterly to the Audit Committee of the Board of Directors.

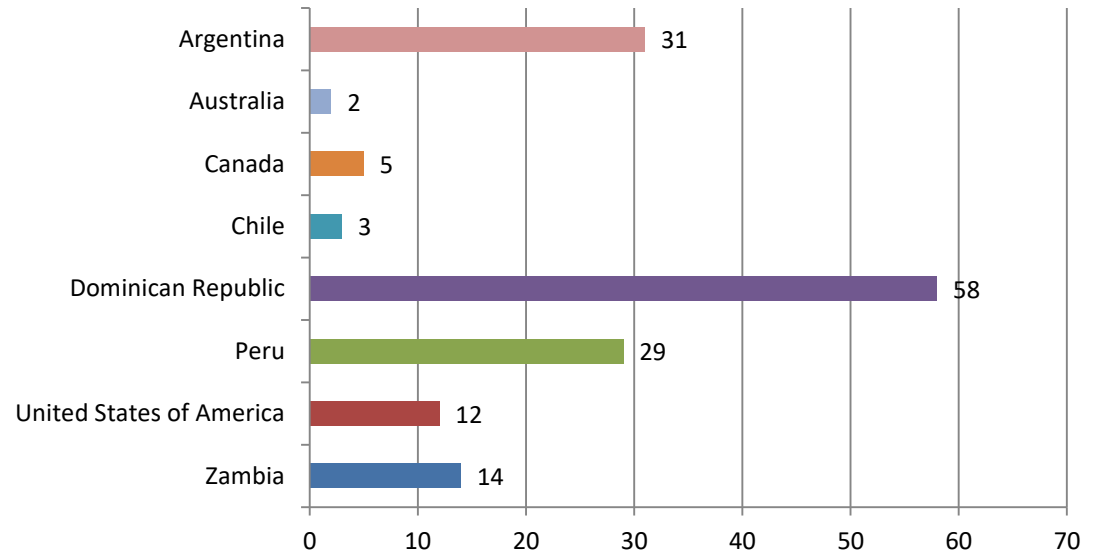




In 2016, for sites operated by Barrick:

- **Reports were received from approximately 25 locations in 7 countries worldwide;**
- More than two thirds of these were reported anonymously; and
- Over 65% were reported using the Compliance Hotline.

2016 Cases reported by country





Compared to reports received or closed in 2015, in 2016:

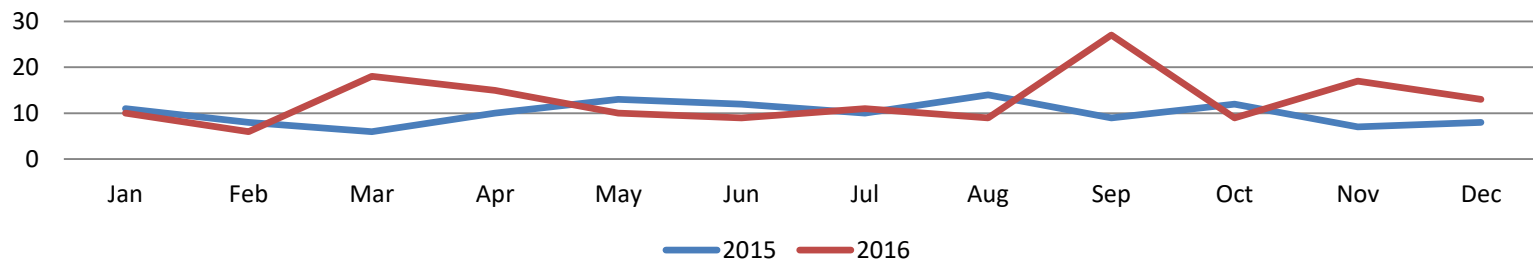
- The number of new reports rose by 25% overall;
- Labor and Union Concerns, Harassment and Discrimination, and Commercial Bribery comprised a greater proportion of reports received; and
- The number of resolved cases that were substantiated or partially substantiated rose by over 15%.

If you see a situation that you think might violate the Code or a related policy, ask questions and voice your concerns. You can remain anonymous if you wish.

All reports are taken seriously, and all allegations that implicate the Code of Conduct are investigated. Retaliation due to good faith reporting will not be tolerated.

Please also remember that because disciplinary action is confidential, the fact that you may be unaware of an action does not mean that discipline hasn't occurred.

Cases Received in 2015 and 2016, by month and year





Obeying the Law

Barrick is committed to complying with all applicable laws wherever we do business.

Even when an action is legal, customary, and accepted in a community, we will not engage in it if it violates our Code of Conduct or related policies.

We should all know the laws relevant to our work. Consult the Legal Department for more information and assistance.





Insider Trading

Trading based on material non-public information, otherwise known as “**insider trading**”, is a serious violation both of the Code of Conduct and of Canadian and U.S. securities laws. Insider trading by employees may result in termination and potential criminal prosecution that can lead to large fines, as well as prison time.



Tipping is also prohibited. Tipping occurs when you provide material, non-public information to someone other than in the necessary course of business, even inadvertently. Be careful not to disclose any material, non-public information to anyone outside the Company, including family members or friends.

[*Click to view the Insider Trading Policy*](#)



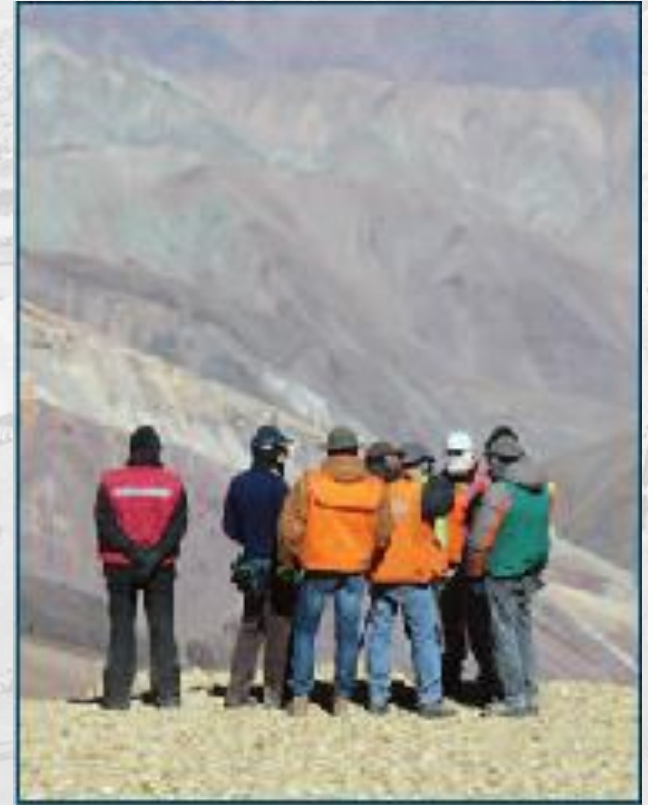
Conflicts of Interest

The Code of Conduct requires that you avoid conflicts of interest with Barrick.

A conflict of interest situation is one in which you make, or can be perceived to make, decisions based on personal gain rather than in Barrick's best interest.

You must immediately disclose the facts of a real or potential conflict of interest to your supervisor, mine or project manager, Country Executive Director, or local In-House Legal Counsel.

They will consult with the Legal Department and determine appropriate next steps.





Harassment

We do not tolerate harassment regardless of whether the harasser is on Company premises or at off-hours functions, such as holiday parties or business travel.

Barrick expects that all workplace conduct will be professional and free of bias and harassment.





Harassment

Harassment is any form of behavior that is not welcome and which offends, humiliates or intimidates a person, including:

- Verbal harassment, such as derogatory comments;
- Bullying (including physical, social and cyber-bullying);
- Physical harassment, such as assault and physical interference; and
- Visual harassment, such as drawings, photos, and any other potentially offensive material, whether printed or electronic.





Harassment

Sexual harassment consists of unwelcome sexual advances, requests for sexual favours, or other verbal or physical conduct of a sexual nature, including:

- Unwelcome comments or jokes of a sexual nature;
- Unwelcome, unnecessary, or offensive touching or crowding; and
- Derogatory or offensive posters, drawings, or gestures.



Barrick does not tolerate harassment in any form.

[*Click to view the Global Harassment Standard*](#)



Gustavo was recently hired by Barrick as a Process Area Supervisor, and was chosen by the mine's Tender Committee to provide a technical opinion on the bids presented by potential vendors.

During his reviews of the bids, Gustavo noticed that one of the bidding companies was Engineering SA, which is owned by an old and close friend of his. Gustavo doesn't feel that this will affect his technical opinion of their bid, but isn't sure what he should do.

What is the next step Gustavo should take?

- A. He should proceed since he doesn't see any problem with the situation
- B. He should report the relationship to his supervisor or to an In-House Legal Counsel
- C. He should withdraw from providing his opinion
- D. He should ask a colleague to confirm his opinion before providing it to the committee
- E. He should provide the opinion to the committee but also note his relationship.



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- E. He should provide the opinion to the committee but also note his relationship.

INCORRECT: Gustavo should not proceed without reporting the relationship to his supervisor or an In-House Legal Counsel. The friendship could create or be perceived to create a conflict of interest – a clash between personal and the Company's interest – so proceeding without notifying the proper persons could be a violation of the Code. Transparently reporting the relationship will allow them to put in place any necessary controls or adjustments to the bidding process to mitigate the potential conflict and assure an appropriate level of independence. Such controls might include Gustavo clearly noting his relationship when he provides his opinion to the committee, obtaining a second opinion from a colleague, or withdrawing his opinion entirely.

Code of Conduct – In Practice: in 2016, 8% of the potential violations reported were related to Conflicts of Interest or Corporate Opportunities.



What is the next step Gustavo should take?

- A. He should proceed since he doesn't see any problem with the situation
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- C. He should withdraw from providing his opinion
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CORRECT: Gustavo should report the relationship to his supervisor or an In-House Legal Counsel before proceeding further. Because his friendship could create or be perceived to create a conflict of interest – a clash between personal and the Company's interest – transparently reporting the relationship will allow them to put in place any necessary controls or adjustments to the bidding process to mitigate the potential conflict and assure an appropriate level of independence. Such controls might include Gustavo clearly noting his relationship when he provides his opinion to the committee, obtaining a second opinion from a colleague, or withdrawing his opinion entirely.

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- E. He should provide the opinion to the committee but also note his relationship.

INCORRECT: While the final recommendation may be for Gustavo to withdraw himself from the process, he should first report the relationship to his supervisor or an In-House Legal Counsel. Because his friendship could create or be perceived to create a conflict of interest – a clash between personal and the Company's interest – transparently reporting the relationship will allow them to put in place any necessary controls or adjustments to the bidding process to mitigate the potential conflict and assure an appropriate level of independence. Such controls might include Gustavo withdrawing his opinion, or they might instead ask Gustavo to clearly note his relationship when he provides his opinion to the committee, or to obtain a second opinion from a colleague.

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Linda, a Finance Supervisor, has been mentoring a male intern for the summer. During his last month with the team, she invited him to dinner and afterwards she touched his hand and offered to recommend him for a permanent position upon graduation if he agreed to continue seeing her outside of work. Surprised and uncomfortable, he pulled his hand away but didn't answer her at the time. At work the next week, she invited him to more in-depth meetings than he had attended previously and recommended him for a new project she knew he was interested in.

- A. He should report Linda's actions – they violate the Code of Conduct
- B. He shouldn't report Linda's actions because she didn't mention her offer again



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- A. He should report Linda's actions – they violate the Code of Conduct**
- B. He shouldn't report Linda's actions because she didn't mention her offer again

CORRECT: Linda's behavior at dinner involved unwelcome touching and romantic advances that made the intern uncomfortable. This is sexual harassment, and is a violation of the Code of Conduct.

If you experience or observe sexual harassment, you should promptly report the statements or actions to your designated local management contact.

Code of Conduct – In Practice: in 2016, Harassment and Discrimination were the second most frequently reported type of concern, making up 19% of total reports. Other Labor / Union Issues were reported the most, with 43% of all reports.



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Silvia, a Maintenance employee, overheard colleagues from another department commenting that her supervisor was not reporting required information to authorities relating to sulfur emission levels in the mine's Truck Shop. She is concerned that this could be true, but isn't sure what she should do.

- A. Silvia should not report the allegations because she doesn't have proof that they are true.
- B. Silvia should report what she heard to the Legal Department or Compliance Hotline so the potential misreporting can be investigated



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- B. Silvia should report what she heard to In-House Legal Counsel or the Compliance Hotline so the potential misreporting can be investigated

INCORRECT: According to Barrick Code of Conduct, if you think an actual or potential violation may have occurred, it's important to come forward and report your concerns – even if you did not witness or do not have proof of the violation yourself.

In this situation, neglecting to report required environmental data to the authorities could trigger criminal liability for the people involved as well as regulatory sanctions for the company, so it is important that Silvia speaks up and reports what she heard so it can be investigated. Further, if she suspects these are intentional and repeated incidents and management could be aware, it could indicate significant or systemic non-compliance with applicable regulatory requirements and deterioration in the overall internal control environment at the site.

According to the Code of Conduct, this situation must be reported through a Formal Reporting Channel.



Scenario Activity – Obeying the Law and Internal Controls

BARRICK

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BARRICK



Human Rights and Labor



Barrick is committed to doing business in a manner that respects the fundamental human rights of its employees and stakeholders. It is a principle that defines who we are as a company and how we do business.

We do not tolerate human rights violations by employees, affiliates, or any third parties acting on our behalf or related to any aspect of a Barrick operation.





A “human right” under Barrick’s Human Rights Policy is a right recognized by the United Nations International Bill of Human Rights or as otherwise identified in Barrick’s policies and procedures.

Human rights violations can include:

- Physical abuse;
- Killing;
- Violations in the legal system;
- Labor abuses;
- Violations of property rights;
- Violations of personal rights; and
- Discrimination.





Barrick is committed to fair employment practices and a workplace in which all individuals are treated with dignity and respect.

We believe that every individual within the company must be accorded equal treatment, and we are each responsible for ensuring that the workplace is free from all forms of discrimination, harassment and retaliation.

Barrick also respects the rights of employees to freedom of association and collective bargaining. This includes the right of each individual employee to join a union or other labor association.



Human trafficking and modern slavery are important issues related to Human Rights that many companies face in different ways.

Human trafficking is the **2nd largest** criminal activity in the world. An estimated 27 to 30 million people are victims of modern slavery.

Human trafficking and modern slavery can include:

- Holding or transporting people against their will
- Forced labor through violence, deception
- Buying or selling people
- Sexual exploitation
- Child labor and prostitution
- Indentured servants





Common industries for human trafficking and modern slavery include:

- Agriculture
- Factories
- Domestic service
- Prostitution

Signs that human trafficking and modern slavery could be present:

- Child workers
- Victims who can't speak the local language or move about and live in the local community
- Heavy security and restrictive access in the workplace
- Secretive advertisements for services
- Domestic violence



Trafficking and modern slavery may be present in our supply chains and communities.



Human rights violations frequently also violate domestic laws, which may include: domestic criminal laws; labor laws; laws protecting property; laws protecting civil rights; and other legal provisions.

Most human rights violations bring the potential for severe consequences.

For Individuals:

- Lengthy jail terms;
- Harsh monetary fines; and
- Employment disciplinary measures, including termination.

For Companies:

- Fines;
- Suspension of operation; and
- Loss of licenses.





If you have information about a potential human rights violation, including human trafficking related to our operations or in our communities, you must report it.

Failure to report can lead to discipline or termination.

Even a rumour that you don't know to be true is enough to make a report.

To report a human rights violation you can:

- Contact the Compliance Hotline; or
- Report the matter to any legal counsel or designated local management contact.



We do not expect you to report what law or what human right may have been violated. We do expect you to report information related to conduct that seems wrong or improper. You can report your concern anonymously if you wish.



If you haven't yet read the Human Rights Policy or the Policy with respect to the Declaration of Fundamental Principles and Rights at Work, please use the links below to open them on your computer. You can read them again after completing the training.

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

[*Click to view the Policy with respect to the Declaration of Fundamental Principles and Rights at Work*](#)





Ken, the mine Security Manager, learned from a Security contractor's weekly report that the contractor had detained suspected robbers on our site. The contractor had notified the police, who asked the contractor to hold the suspects until they arrived. The contractor kept the suspects in a small locked room on the contractor's premises in the nearby local community. The police did not arrive for more than 24 hours, and the suspects were handcuffed during that entire period, without access to food, water, or sanitation.

- A. The mine Security Manager should escalate this report using a Formal Reporting Channel, as it is a violation of our Human Rights Policy
- B. The mine Security Manager should not do anything, as the incident occurred offsite and involved a security contractor and the local police



Ken, the mine Security Manager, learned from a Security contractor’s weekly report that the contractor had detained suspected robbers on our site. The contractor had notified the police, who asked the contractor to hold the suspects until they arrived. The contractor kept the suspects in a small locked room on the contractor’s premises in the nearby local community. The police did not arrive for more than 24 hours, and the suspects were handcuffed during that entire period, without access to food, water, or sanitation.

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- B. The mine Security Manager should not do anything, as the incident occurred offsite and involved a security contractor and the local police

CORRECT: Even though the security contractor obeyed the local police’s instructions, the nature and extent of the detention violated our Human Rights Policy, which also applies to contractors in connection with their work for Barrick. The mine Security Manager should **report the incident** using a Formal Reporting Channel. Human Rights abuses must be identified and reported, even if they occur in our supply chains, with a contractor, or in our communities.

For more information on reporting suspected human rights violations, please refer to the Human Rights Reporting and Escalation Procedure, which is found on the Core’s Policies and Standards page.



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During a mine expansion project, a Supply Chain employee learns that a construction contractor is holding the passports of foreign workers until their work on site is complete. An investigation finds that the contractor often holds the passports of foreign workers until their work is complete, to help make sure projects are completed on schedule and within budget.

- A. The contractor's actions violate Barrick's Human Rights Policy
- B. The contractor's actions do not violate Barrick's Human Rights Policy



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- A. The contractor's actions violate Barrick's Human Rights Policy**
- B. The contractor's actions do not violate Barrick's Human Rights Policy

CORRECT: The contractor's actions violate our Human Rights Policy. The Policy includes a prohibition on the use of forced, compulsory or indentured labor. Withholding passports of foreign workers as a condition of employment - or otherwise preventing them from leaving the country - constitutes forced labor under international norms. If the contractor had been holding the passports for safe keeping or voluntarily, and the workers had been advised they could obtain the passports on request, that would not constitute forced labor.

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BARRICK



Anti-Bribery & Anti-Corruption



- Barrick Operates Ethically
- Corruption harms the local communities in which we operate
- Corruption fuels conflict and violence
- Corruption presents risks of prosecution for the Company, and jail time for Employees
- Corruption is frequently cited as support for nationalizations, where states take businesses, deny key licenses, or cancel contracts
- Corruption prevents mergers and acquisitions, and hinders access to capital and markets



Nationalization is the act of taking assets or companies into state ownership or control. Sometimes it is done using legal means, but payment may or may not be fair to the private owners.



Problems can arise, for Barrick and individuals involved, whenever **anything of value** is given to Government Officials, directly or indirectly (including consultants or relatives).

Processes involving government approvals or decisions include:

Licenses, permits, visas, lands, taxes/royalties, customs, concessions, litigation, support, security, labor, contracts, etc.



"Anything of value " includes cash, travel, meals, gifts, entertainment, donations or contributions, employment, contracts and any other item whether tangible or intangible.

Risks can arise even if what was given did not intend to secure a contract, permit, concession, or obtain other improper advantage for Barrick BUT it could be perceived that way.



- Giving or offering anything of value to a Foreign Official, directly or via a third party, to improperly secure a benefit or advantage **is a Bribe – and a Crime.**
- Failure to maintain accurate books and records **violates laws that apply to us.**
 - Thus, not recording payments to government officials or failing to develop detailed supporting documentation can create liability **even if no bribery takes place.**
- Failure to establish and maintain a system of internal controls to prevent and detect bribery **violates laws that apply to us.**
 - As an example, failure to have a reasonable system in place for conducting due diligence on third parties could violate the law **even if no bribery takes place.**





In all of the following circumstances, you must accurately document the Government entity and/or Officials involved, the nature and purpose of the expense, and any approvals obtained from an Authorized Approval Employee ("AAE"):

- Meals and Transportation provided to Government Officials.
- Gifts given to, or the costs associated with Entertainment provided to, Government Officials.
- Payments you have directly or indirectly made to Government Officials, including Political Contributions.
- Expenses you have reimbursed for Government Officials.
- Agreements with, or Donations given to, Government or Third Parties affiliated with Government or Government Officials.

[*Click to view the List of Authorized Approval Employees*](#)





Third parties (such as consultants, agents, brokers, advisors, finders, contractors or suppliers) who interact with government officials on Barrick's behalf must also comply with anti-corruption laws. They must undergo heightened due diligence processes and controls.

You must take the following steps:

- Follow Supply Chain's onboarding standard for new and existing vendors; and
- Disclose to Supply Chain and Legal any relationships or links with the Government or Government Officials of the Third Parties you are engaging or requesting to engage.





Barrick's Policy also prohibits commercial bribery:

- You should not offer anything of value to an employee of another company for the purpose of obtaining an improper advantage for Barrick.
- You should not accept payments or gifts that may cause you to act against Barrick's interests.





If you haven't yet read the Anti-Bribery and Anti-Corruption Policy in full along with its related Procedures, please use the links below to open them on your computer. You can read them in after completing the training.

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

[*Click to view the related Standards & Procedures*](#)

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The Operations Supervisor received a letter from the regional Mining Authority communicating a mine inspection and requesting transportation and meals during his stay at the mine.

Does the Authority's request to be provided with transportation and meals for the government official need to go through the Authorized Approval Employee (AAE) approval process?

- A. The Authority's request does not require AAE approval because it does not involve cash payments or in-kind support that could be resold
- B. The Authority's request does require AAE approval because meals and transportation are things of value



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- B. The Authority's request does require AAE approval because meals and transportation are things of value

INCORRECT: This request does require AAE approval because problems can arise for Barrick and individuals involved whenever "**anything of value**" is given to government officials, including things like meals and transportation. Bear in mind that "anything value" does not necessarily mean something of monetary value, but is measured from the perspective of the recipient (i.e., does the recipient value it). It also can include promises, job offers, and other things that are not necessarily physical or tangible.

In addition to following the other applicable local approval processes, the Operations Supervisor should contact their local Authorized Approval Employee to obtain AAE approval before agreeing to the transportation and meal request, as defined in the Procedure for Implementing the Anti-Bribery and Anti-Corruption Policy.



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We have filed an Environmental Impact Assessment (EIA) which has been pending approval before the Minister of Environment for a long time, with no apparent explanation for the delay. The Minister's husband is the head of a charity that is raising money across the country for relief funds to assist victims of a recent earthquake. Bill suggests that the company donates to the charity to help progress the EIA approval. Is Bill's suggestion appropriate?

- A. Yes, Bill's suggestion is fine because the donation is going to a legitimate charity and for a good cause.
- B. No - Bill's suggestion represents an attempt to influence a pending government decision and violates our Anti-Bribery and Anti-Corruption Policy.



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INCORRECT: Although the money would go to a charity, Bill's intent in offering a donation is to influence a specific government approval – and that has been interpreted by regulatory authorities as violating anti-corruption laws, because it constitutes an impermissible effort to bribe or influence a government action.

According to the Procedure for Implementing the Anti-Bribery and Anti-Corruption Policy, donations to charities that are affiliated with government officials or their immediate family members require careful due diligence from the local Authorized Approval Employee (AAE) in order to determine whether a specific donation will be permissible or prohibited.



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Ana, a site Buyer, noticed that over a period of months there were regular purchase requisitions for the same vendor and equipment. She learned that these requisitions were expedited at the request of an IT Coordinator with the support of the Mine Manager, and she learns that the equipment often was mislabeled or incompatible with our systems but not returned. She thinks the situation seems odd.

- A. She should not report her suspicions – she is in a different department and the way the IT Coordinator handles business is none of hers. The Mine Manager’s involvement and his approval of the purchase requisitions is all she needs to know and verify.
- B. She should report her suspicions as it could signal a violation of the Anti-Bribery and Anti-Corruption Policy



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INCORRECT: The Buyer should report her concerns, as her observations suggest something may be wrong with the services the vendor is providing and the continued requisitions suggest there could be some form of commercial bribery between the vendor and the IT Coordinator (and potentially the Mine Manager). We all have a responsibility to report a concern when we become aware of it, and this situation should be investigated to determine if any wrongdoing is taking place.

Commercial bribery takes place when a payment or gift is offered or accepted in return for influencing a business decision, and it could cause one to act against Barrick’s best interests. It is prohibited by the Anti-Bribery and Anti-Corruption Policy.

Code of Conduct – In Practice: in 2016, Commercial Bribery and Fair Dealing made up 15% of total reports.



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Tony realizes that the licenses for use of explosives at his site are about to expire. A bi-annual inspection is required before the licenses can be reissued, and unless the inspection occurs soon, it may impact operations. Tony suggests that, to make sure the inspections are scheduled quickly, a small payment is made to the inspector to put the company at the top of his list. The local law does not prohibit such payments.

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- B. Tony's suggestion does not violate our Anti-Bribery and Anti-Corruption Policy



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- B. Tony’s suggestion does not violate our Anti-Bribery and Anti-Corruption Policy

CORRECT: The payment Tony is suggesting is a facilitating payment, which is prohibited by Barrick in all jurisdictions where Barrick operates, as prescribed in our Anti-Bribery and Anti-Corruption Policy and Procedures.

A “facilitating payment” is a payment made to expedite a routine administrative act, such as:

- Processing government papers;
- Scheduling inspections;
- Providing phone, water, power service; or
- Other activities performed by a government official that do not involve discretion by the government official.



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BARRICK



***Reporting violations to the Code of Conduct,
Human Rights, or Anti-Bribery and
Anti-Corruption Policies***



Open communication about the Code and our ethical standards is a cornerstone of Barrick's culture of compliance.

Barrick expects you to:

- Take responsible steps to prevent a Code violation;
- Raise potential issues before they lead to problems; and
- Seek additional guidance when needed.





Employees can report concerns or complaints to Barrick assigned local management contacts.

If you cannot resolve the matter at the local management level, you should promptly contact:

- The General Counsel;
- Any Barrick In-House Legal Counsel; or
- Report the matter through the Compliance Hotline.





The following chart lists the designated management contacts.

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



Certain types of suspected Code of Conduct violations must be reported through a Formal Reporting Channel. These are:

- An alleged misstatement in Barrick's publicly released financial statements;
- An alleged misrepresentation in Barrick's other public disclosure;
- Any other matter that could reasonably be expected to result in a restatement of Barrick's publicly released financial statements;
- Alleged bribery of a government official or other alleged violation of anti-corruption laws;



Certain types of suspected Code of Conduct violations must be reported through a Formal Reporting Channel, include:

- Known or suspected cases of severe human rights violations;
- Known or suspected fraud that involves a potential cost or loss to Barrick exceeding US\$10,000;
- Known or suspected fraud, regardless of amount, that involves an officer of Barrick;
- Known or suspected fraud, regardless of amount, that involves an employee who has a significant role in Barrick's internal controls; or



Certain types of suspected Code of Conduct violations must be reported through a Formal Reporting Channel. These are:

- An event or series of events indicative of a deterioration in the overall internal control environment at a Barrick mine site, project development site, or office, including a known or suspected incident or repeated incidents which indicate significant or systemic non-compliance with applicable regulatory requirements.

If there is any doubt as to what category the matter falls into, you must use one of the Formal Reporting Channels.



The following are considered Formal Reporting Channels:

1. The General Counsel or any Barrick In-House Legal Counsel regarding all issues;
2. The Compliance Hotline accessible by phone or using the web portal;
3. The Audit Committee for accounting and auditing issues (in addition to channels 1 and 2 above); or
4. The Chairman of the Board or any other member of the Board of Directors for issues involving any senior executives, or financial officers (in addition to channels 1 and 2 above).





You can report concerns or complaints through the Compliance Hotline, which is available by telephone and Internet portal.

It allows for anonymous reports or inquiries and is available 24 hours a day, 7 days a week.

Contact information for the Compliance Hotline can be found on Barrick's Intranet.

[*Click to learn how to contact the Barrick Compliance Hotline by telephone or internet portal*](#)

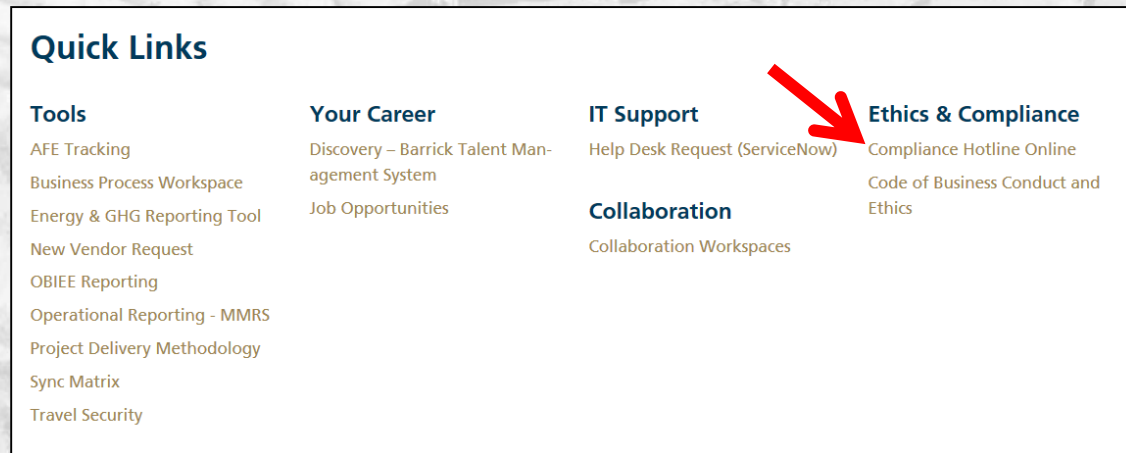
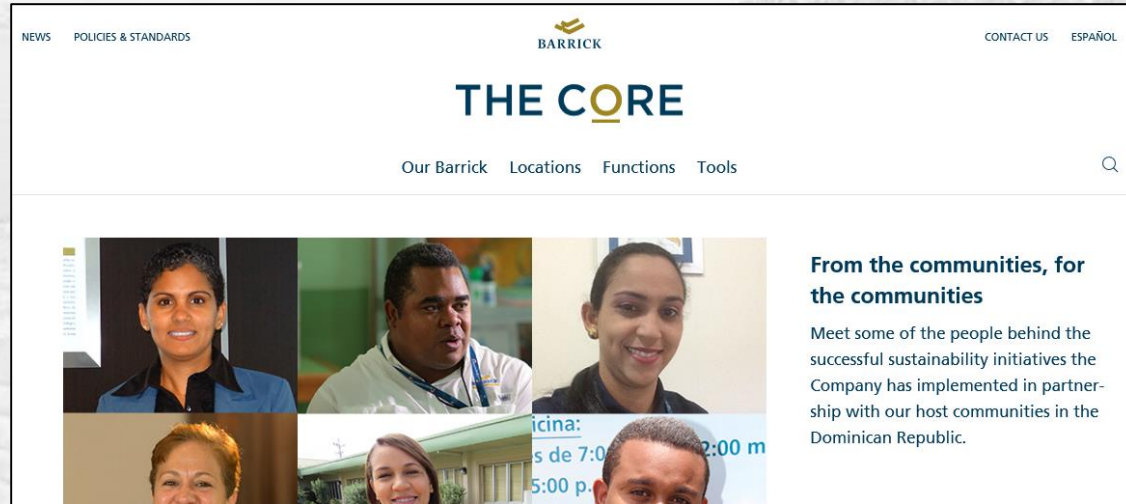




If you would like to make a report using the online Compliance Hotline, you can find a link to it on The Core intranet home page.

On The Core home page, scroll down to the "Quick Links" section and click on the link that says "**Compliance Hotline Online.**"

This will take you to the Hotline website where you can create and submit your report.





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Compliance Hotline Online

Once on the Hotline website, to submit a report, click the "Report a Concern or Complaint" button on the left.

This will take you to a page where you will specify the location where the incident or violation occurred, and then on the page that follows you can answer other specific questions about the allegations.

You can also confirm if you want to report anonymously.

English | Español

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ATTENTION! This webpage is hosted on EthicsPoint's secure servers and is not part of the Barrick Gold Corporation website or intranet.

Home Code of Business Conduct and Ethics Other Policies

Welcome to Barrick's Compliance Hotline

Barrick Gold Corporation is committed to conducting our business in accordance with all applicable laws and the highest ethical standards throughout our worldwide organization. Barrick's Code of Business Conduct and Ethics and related policies embody this commitment.

Barrick is committed to maintaining an environment where open, honest communications are the expectation, not the exception. We want you to feel comfortable in approaching your supervisor or local management with questions and concerns, including in instances where you believe violations of the Code of Conduct may have occurred. The Code of Conduct sets out the designated local management contacts for employees to report concerns or complaints related to the Code of Conduct.

In addition, Barrick has provided the Compliance Hotline for you to report unethical behavior and policy violations securely and confidentially by telephone or via the Internet. You may remain anonymous if you wish. The Compliance Hotline is operated by EthicsPoint, a third-party provider. The information you report through the Compliance Hotline will be sent to us by EthicsPoint in a format that protects your confidentiality. Your willingness to come forward is important to us. We take all reports about compliance and ethics matters seriously and will look into each report and follow up when further action is appropriate.

See the [Compliance Hotline FAQs](#) for more information.

REPORT A CONCERN OR COMPLAINT
Click here to report suspected ethical misconduct, or a violation of company policy, law or regulation.

FREQUENTLY ASKED QUESTIONS
Click here to view answers to commonly asked questions about Barrick's Compliance Hotline and reporting methods.

FOLLOW UP
Report Key:
Password:

EthicsPoint is NOT a 911 or Emergency Service.

ethics.point You are now in an EthicsPoint Secure Area | [File a Report](#)

[Back to Home](#)

ETHICSPPOINT IS NOT A 911 OR EMERGENCY SERVICE.
Do not use this site to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact your local authorities.

* Yes - I agree to the [Terms and Conditions](#) of making this report.

Please provide information as follows:
(* Required fields)

Organization/Tier: **Barrick Gold Corporation or any of its subsidiaries**

Location where incident occurred: Other/Do not know (Canada)



At the end of the report questionnaire, you will be asked to create a **password** for your report. Only you will have access to this password.

Once you submit the report, a unique **Report Key** will also be provided to you on the confirmation screen.

Please take note of the report key along with your password. You can use these to access the report later to review what you submitted, ask questions, or provide more information.

If you have a document or file that supports your report, please attach it to your report. Most common file types can be uploaded:

[Click here to upload files](#)

When you submit the report, you will be issued a Report Key. Please write it down and keep it in a safe place. We ask you to use this Report Key along with the password of your choosing to return to EthicsPoint through the website or telephone hotline in 10 business days. By returning in 10 business days, you will have the opportunity to review any Follow-up Questions or submit more information about this suspected incident or violation.

Please choose a password for this report:

* Password:

* Re-enter Password:

Your passwords must match and be at least four characters long.

ethics.point

You are now in an EthicsPoint Secure Area | [File a Report](#)

YOUR REPORT KEY IS:
719955

Write this down and keep this in a safe place!
You will need your report key and the password you selected to check on your report in the future or to make a follow-up.



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Compliance Hotline Follow-up Option

If you have already reported a concern using the Compliance Hotline telephone or website, you can use the Hotline website's **Follow-up option** to communicate with those investigating your report or to provide additional information.

On the first page of the Hotline website, enter your Report Key and password in the "Follow Up" box on the right, and click Log In.

This will take you to the Follow Up screen shown at right.

If you submitted your original report anonymously, you can remain anonymous throughout the follow-up process.

English Español

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FOLLOW UP
Report Key: 719955
Password: *****
Log In

ethics-point

Issue Type
Concern

Report Actions
Questions and Comments
[Add Follow-Up Notes](#)
[Upload Files](#)
[Report Details](#)
[Print My Report](#)
[Log Off](#)

Questions and Comments
The organization does not have any questions or comments at this time.



Reasonable efforts will be made to ensure confidentiality of reports about suspected Code violations.

Retaliating against someone making a good-faith report is against the law and Company policy.

Barrick will not tolerate retaliatory action against any person for raising concerns regarding ethics matters or for reporting suspected Code of Conduct violations in good faith.





Bob is a supervisor who recently joined the company. He frequently curses, yells at his subordinates, and comments on the appearance of women in the office. Megan was going to complain to HR, but Bob convinces her not to. Bob's conduct continues, and a week later, a call is placed anonymously to the Compliance Hotline.

An investigation finds that while Bob's cursing and yelling is not appropriate and inconsistent with the responsibilities of a supervisor, his comments about the appearance of female workers violates the Code. Megan, who always had received outstanding performance evaluations, is passed over for a promotion she had been long expecting. She believes Bob blocked the promotion out of retaliation, and that he suspects Megan is the one who reported him.

- A. Megan should report her concern that Bob retaliated against her by bypassing her for promotion
- B. Megan should not report her concern; promotions are handled between supervisors and Human Resources and there is nothing she can do.



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- A. **Megan should report her concern that Bob retaliated against her by bypassing her for promotion**
- B. Megan should not report her concern; promotions are handled between supervisors and Human Resources and there is nothing she can do.

CORRECT: Megan should report her concerns via the Compliance Hotline or to any In-House Legal Counsel or the Human Resources Department, who will take appropriate steps to investigate the situation. If it is found that her supervisor did pass her over for promotion because he thought she filed the earlier report about his harassing behavior, this could constitute retaliation, which is a violation of our Code of Conduct. Barrick does not tolerate retaliation against individuals who report in good faith concerns about possible Code violations. Barrick also actively tries to protect from retaliation employees, contractors and third parties who report concerns in good faith, including in respect to promotions, performance evaluations, and in other respects.



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Mark conducts testing on water quality that shows levels of mercury outside the permit range, and outside permissible local regulations. Mark's boss tells him that unless the results are changed, it will have to be reported to authorities, which could result in fines and possible loss of productivity, and instructs him to change the results. Mark initially refuses, but his boss continues to pressure him. After a week Mark gives in and makes the changes. Following a call to the Hotline and an investigation, Mark's boss is disciplined, and the company has to determine whether Mark also should be disciplined. Has he violated the Code of conduct, and should he be subjected to discipline?

- A. He did not violate the Code because his boss instructed him regarding the reporting results
- B. He did violate the Code, but because his boss pressured him to alter the results he should not face disciplinary action
- C. He did violate the Code, and regardless of whether his boss told him to change the results he should face discipline



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INCORRECT: Mark did violate the Code when he falsified the test results and may face disciplinary actions for his role in the situation. Remember, nobody can instruct you to do something that violates the Code of Conduct; fear of being disciplined or not getting the results expected from the mine are not acceptable excuses to violate the Code.



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- C. He did violate the Code, and regardless of whether his boss told him to change the results he should face discipline**

CORRECT: Mark did violate the Code when he falsified the test results and may face disciplinary actions for his role in the situation. Remember, nobody can instruct you to do something that violates the Code of Conduct; fear of being disciplined or not getting the results expected from the mine are not acceptable excuses to violate the Code.



If you have any questions about this training or the Code of Business Conduct and Ethics, the Human Rights Policy, or the Anti-Bribery and Anti-Corruption Policy, please contact corporate or head country In-House Legal Counsel.

Please read the policies at the links below if you have not already done so. The policies will open in new windows and you can read them again after completing the course.

[*Code of Business Conduct and Ethics*](#)

[*Human Rights Policy*](#)

[*Anti-Bribery and Anti-Corruption Policy*](#)

[*Anti-Fraud Policy*](#)

[*Policy with respect to the Declaration of Fundamental Principles and Rights at Work*](#)





Thank you for participating in this important refresher training on Barrick's Code of Business Conduct and Ethics, and our human rights and anti-corruption programs.

You should now be able to:

- Identify your responsibility to comply with the Code of Conduct;
- Recognize the importance of human rights and anti-corruption compliance;
- Recognize situations that pose ethical concerns and know how the Code of Conduct can help you arrive at the right answer;
- Know the various ways in which you can report a concern; and
- Know how to anonymously follow up on a Hotline report.



Kelvin Dushnisky
President



Barrick's success has been built on a foundation of partnership, personal and professional integrity, and a commitment to excellence. As a company and as individuals, we must guide our conduct by the highest standards of honesty, integrity and ethical behavior. It is a pledge we make to each other and to our many stakeholders around the world.

You will now be directed to Certification and Acknowledgement forms, where you must answer each of the questions before completing the course.



Kelvin Dushnisky
President



Part 1

If the following statements are true as they apply to you, click the "Yes" button.

If the statements are not true as they apply to you, click the "No" button.

A member of the legal department will contact you to follow up as appropriate.

1. I am in compliance with the requirements of the Code of Business Conduct and Ethics, the Anti-Bribery and Anti-Corruption Policy, the Human Rights Policy and the Anti-Fraud Policy.

[Yes]

[No] *(If "No," a member of the Legal Department will contact you to follow up)*

2. **I am aware** of a violation or potential violation of the Code of Business Conduct and Ethics, the Anti-Bribery and Anti-Corruption Policy, the Human Rights Policy or the Anti-Fraud Policy that has not yet been reported.

[Yes] *(If "Yes," a member of the Legal Department will contact you to follow up)*

[No]



Part 1 continued

3. I am currently, or was in the past two years, a Government Official.

[Yes] *(If "Yes," a member of the Legal Department will contact you to follow up)*

[No]

4. I am the spouse/partner, parent or parent-in-law, child or son/daughter-in-law, stepson or stepdaughter, aunt or uncle, niece or nephew, sibling or brother/sister-in-law of a Government Official.

[Yes] *(If "Yes," a member of the Legal Department will contact you to follow up)*

[No]

5. I was referred by a Government Official for employment with Barrick.

[Yes] *(If "Yes," a member of the Legal Department will contact you to follow up)*

[No]



Part 1 continued

6. I have been formally accused or convicted/found liable of a human rights violation.

[Yes] *(If "Yes," a member of the Legal Department will contact you to follow up)*

[No]

7. I have been involved as a party in an administrative, legal or regulatory proceeding involving allegations of (or I am currently under official investigation for) fraud, bribery or corruption, money laundering or terrorist financing.

[Yes] *(If "Yes," a member of the Legal Department will contact you to follow up)*

[No]



Part 2

If you agree with the following statement, click the "I Agree" button.

I understand that any misrepresentation(s) in this Certification may be grounds for disciplinary measures by the Company.

I Agree



If you agree with the following statements, click the “I Agree” button.

1. I have read and understand the Code of Business Conduct and Ethics, the Anti-Bribery and Anti-Corruption Policy, the Human Rights Policy, the Anti-Fraud Policy, and the Policy with respect to the Declaration of Fundamental Principles and Rights at Work.
2. I agree to comply with these requirements, including the requirements relating to conflicts of interest, compliance with laws, bribery and improper payments to government officials, financial controls, misuse of company assets and information, environmental, health and safety practices, harassment and discrimination, and human rights compliance.

I Agree



If you agree with the following statements, click the “I Agree” button.

3. I agree that if I am aware of a violation or potential violation of the Code of Business Conduct and Ethics, the Anti-Bribery and Anti-Corruption Policy, the Human Rights Policy or the Anti-Fraud Policy that has not been reported, or I am uncertain about whether a particular circumstance constitutes a violation of the Code of Business Conduct and Ethics, the Anti-Bribery and Anti-Corruption Policy, the Human Rights Policy, the Anti-Fraud Policy, or the Policy with respect to the Declaration of Fundamental Principles and Rights at Work, I will promptly contact the Compliance Hotline or my designated local management representative as set forth in the Code of Conduct.
4. I acknowledge that if one of my immediate relatives (a spouse/partner, parent or parent-in-law, child or son/daughter-in-law, stepson or stepdaughter, aunt or uncle, niece or nephew, sibling or brother/sister-in-law) becomes a Government Official, or if his/her role in the government changes, it is my obligation to disclose that relationship or that change to Human Resources.
5. I understand that non-compliance with the provisions of these Policies and any misrepresentation(s) in this Acknowledgment may be grounds for disciplinary measures by the Company.

I Agree



BARRICK



**You have successfully completed
Barrick's Code of Business Conduct and
Ethics, Human Rights, and Anti-Bribery &
Anti-Corruption Refresher Training.**