

EITI International Secretariat's Final Assessment

Company progress in meeting the Expectations for EITI supporting companies

Company name	Gold Fields
Sector	Mining
Headquarters	Johannesburg , South Africa
Type	Public
Date of submission to company (month/year)	June 2023
Pursuant to the Guidance on the Expectations for EITI supporting companies, companies are encouraged to participate in national EITI multi-stakeholder groups (MSGs). For information purposes.	
Does the company, directly or through a subsidiary (including joint- ventures) participate in a multi-stakeholder group?	No
If yes, indicate in which countries your company is participating in MSGs?	PERU
Secretariat comment	The Secretariat notes and thanks the many companies directly and indirectly participating in MSGs in EITI implementing countries.
EXPECTATION 1	Publicly declare and publish support for the EITI and the objective of the EITI Association to make the EITI Principles and

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the EITI Standard the internationally accepted standard for transparency in the oil, gas and mining sectors.	
Does the company publish a statement of support for the EITI and the objective of the EITI Association?	Yes
URL for Statement Support	https://www.goldfields.com/international-standards-and-principles.php
Secretariat's assessment on Expectation 1	Expectation met
Secretariat comment	Statement of support published on its website. See URL.
EXPECTATION 2	Make comprehensive disclosures in accordance with the EITI Standard in all EITI implementing countries where the company or its controlled subsidiaries operate. Where not disclosed in other company reporting, publicly disclose a list of controlled subsidiaries operating in the oil, gas or mining sectors in EITI implementing countries.
Does the company publish a list of controlled subsidiaries?	Yes
URL for controlled list of subsidiaries	https://www.goldfields.com/form-f20.php
EITI implementing countries where the company operates. The countries visible here are based on desk research of EITI Reports.	GHANA, PERU



Does the company make disclosures with EITI Standard in or in relation to EITI implementing countries? Please see attachment on subsidiaries and complete the information, as requested.	Yes
Secretariat's assessment on Expectation 2	Expectation met
Secretariat comment	List of controlled subsidiaries published. See URL to "Form 20-F", section "Further Information", p. 29. Company assessed as making disclosures in accordance with EITI Standard.
EXPECTATION 3	Publicly disclose taxes and payments to governments at a project level in line with the EITI Standard in all non-EITI implementing countries where the company operates unless disclosure is not feasible. Where not feasible, the country-specific legal or practical barriers to disclosure should be publicly explained.
Does the company publicly disclose taxes and payments to governments in non- EITI implementing countries where the company operates in the oil, gas and mining sectors?	Yes
URL to disclosures of taxes and payments to governments in non-EITI implementing countries	Integrated Annual Report 2022: https://www.goldfields.com/pdf/investors/integrated-annual-reports/2022/iar-2022-full.pdf Annual Financial report including Governance Report 2022:

	https://www.goldfields.com/pdf/investors/integrated-annual-reports/2022/annual-financial-report-2022.pdf
Are the disclosures disaggregated by project?	Partial
Secretariat's assessment on Expectation 3	Expectation met
Secretariat comment	<p>Gold Fields discloses taxes and payments to governments in non-EITI implementing countries (South Africa, Ghana, Peru and Australia). See the Integrated Annual Report 2022 URL p. 65-66 which discloses payments to the governments of South Africa, Ghana, Peru and Australia. See also the Annual Financial report including Governance Report 2022 URL p. 152.</p> <p>The company partially discloses taxes and payments to governments disaggregated by project (by mine: South Deep, Tarkwa, Damang, Asanko, St Ives, Agnew, Granny Smith, Gruyere and Cerro Corona). See the Annual Financial report including Governance Report 2022 URL p. 75. The company explains that Gold Fields discloses taxes and payments at mine/project level in all countries except Australia. Accordingly, in Australia, the company's mines are treated as a single entity for financial and tax purposes, so it is not possible to report at mine/project level. In accordance with Guidance on the Expectations, "Where a payment covered by the scope of EITI disclosures is levied at entity level rather than at project level, the company may disclose the payment at the entity level. This may be the case for companies that file consolidated tax returns for all entities in a country." As a</p>

	<p>result, the company was assessed as meeting the expectation.</p> <p>The Secretariat did not assess if the project-level disaggregation in non-EITI implementing countries was adequate or not.</p>
EXPECTATION 4	Companies buying oil, gas and/or mineral resources from the state in EITI implementing countries, disclose volumes received and payments made in line with the EITI Standard and the EITI reporting guidelines for companies buying oil, gas and minerals from governments unless disclosure is not feasible.
Does the company buy oil, gas, and/or mineral resources from the state in EITI-implementing countries?	No
If yes, which countries?	N/A
Does the company make disclosures in line with the EITI Standard/reporting guidelines?	Not applicable
URL for disclosure	
Secretariat's assessment on Expectation 4	Expectation not applicable
Secretariat comment	Gold Fields does not buy oil, gas and/or mineral resources from the state in EITI implementing countries.

EXPECTATION 5		In line with the EITI Standard, publicly disclose audited financial statements, or the main items (i.e., balance sheet, profit/loss statement, cash flows) where financial statement are not available.
Does the company disclose its audited financial statements?	Yes	
URL audited financial statements	https://www.goldfields.com/pdf/investors/integrated-annual-reports/2022/annual-financial-report-2022.pdf	
Secretariat's assessment on Expectation 5	Expectation met	
Secretariat comment	Gold Fields discloses audited financial statements. See URL.	
EXPECTATION 6		Publicly declare and publish support for beneficial ownership transparency and publicly disclose beneficial owners in line with EITI Standard, recognising that listed companies will disclose the name of the stock exchange, include a link(s) to stock exchange filings where they are listed and otherwise do what is required by applicable regulations and listing requirements.
Does the company publish a statement of support for beneficial ownership transparency?	No	
URL statement of support for beneficial ownership	https://www.goldfields.com/international-standards-and-principles.php	



Does the company disclose beneficial owners, either directly or according to stock exchange regulations and listing requirements?	Yes
Where disclosures are made according to stock exchange regulations, please provide the name of the stock exchange	Johannesburg Stock Exchange New York Stock Exchange
URL to stock exchange	Johannesburg Stock Exchange: https://www.jse.co.za/jse/instruments/3305 New York Stock Exchange: https://www.nyse.com/quote/XNYS:GFI
URL for recent beneficial ownership disclosures	Form 20-F: https://www.goldfields.com/pdf/investors/form-20-f/2022/20-f-2022.pdf
Secretariat's assessment on Expectation 6	Expectation partially met
Secretariat comment	Gold Fields does not publish a statement of support for beneficial ownership transparency. The company discloses beneficial owners in line with applicable regulations and listing requirements.

<p>EXPECTATION 7</p> <p>All EITI supporting companies are expected to engage in rigorous due diligence processes and publish an anti-corruption policy setting out how the company manages corruption risk, including how the company collects and takes risk-based steps to use beneficial ownership data regarding joint venture partners, contractors, and suppliers in its processes.</p>	
<p>Does the company publish an anti-corruption policy?</p>	<p>Yes</p>
<p>URL to the policy</p>	<p>Company policies webpage: https://www.goldfields.com/policies.php Anti-Bribery and Corruption Policy PDF: https://www.goldfields.com/pdf/about-us/corporate-governance/policies/anti-bribery-and-corruption-policy.pdf</p>
<p>Does the company's anti-corruption policy describe how the company manages corruption risk with regards to identification and use of beneficial ownership data?</p>	<p>Yes</p>
<p>Secretariat's assessment on Expectation 7</p>	<p>Expectation met</p>

<p>Secretariat comment</p>	<p>The company publishes an anti-corruption policy. See URL.</p> <p>Gold Field’s anti-corruption framework sets out how the company manages corruption risk through the identification and use of beneficial ownership data.</p> <p>The International Secretariat notes that GoldFields’ Anti-Bribery & Corruption Policy considers risk associated to partners, and other risk-related issues such as facilitation payments, gifts, business courtesies, or relationships with government/public officials. The policy forbids any kind of bribe and sets guidelines for engagement in political activities. Section “2.8 Procurement and Transactional Due Diligence” (pages 8-9) sets clear steps on due diligence procedures to third parties, stating that all parties “must be of good standing and integrity in order to do business with the Gold Fields” (page 8). Additionally, section 2.8.2 on joint venture due diligence specifies that these partners are “screened through the relevant approvals framework” (page 9).</p>
<p>EXPECTATION 8</p>	<p>Publicly declare and publish support for governments’ efforts to publicly disclose contracts and licenses that govern the exploration and exploitation of oil, gas and minerals in line with the EITI Standard, and contribute to public disclosure of contracts and licenses in EITI implementing countries consistent with government procedures.</p>
<p>Does the company publish a statement of support for contract transparency?</p>	<p>Yes</p>
<p>URL for statement of support for contract transparency</p>	<p>https://www.icmm.com/en-gb/our-work/governance-and-transparency/mineral-resource-governance/contract-transparency</p>



Does the company contribute to public disclosure of contracts and licenses in EITI-implementing countries consistent with government procedures?	Yes
Secretariat's assessment on Expectation 8	Expectation met
Secretariat comment	<p>Gold Fields publishes a statement of support for governments' efforts to publicly disclose contracts and licenses. See URL (ICMM Member statement).</p> <p>The company is assessed to contribute to the disclosure of contracts and licenses in EITI implementing countries.</p>
<p>EXPECTATION 9 Publish a commitment and/or policy on gender diversity in the oil, gas or mining sectors and support reporting by EITI implementing countries under the EITI Standard by disclosing employment in the sectors disaggregated by gender.</p>	
Does the company publish a commitment/policy on gender diversity?	Yes
Does the company disclose employment data disaggregated by gender?	Yes
URL for relevant information	<p>Group Diversity Policy website: https://www.goldfields.com/policies.php Group Diversity Policy PDF: https://www.goldfields.com/pdf/about-us/corporate-governance/policies/gfl-policy-diversity-board-approved-14-Nov-2017.pdf</p>

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	Integrated Annual Report: https://www.goldfields.com/pdf/investors/integrated-annual-reports/2022/iar-2022-full.pdf
Secretariat's assessment on Expectation 9	Expectation met
Secretariat comment	Gold Fields publishes commitment and/or policy on gender diversity on its website. See URL. Company discloses employment data disaggregated by gender on its integrated annual report. See URL p.23,40 and 54.

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