

EITI International Secretariat's Final Assessment

Company progress in meeting the Expectations for EITI supporting companies

Company name	Newmont
Sector	Mining
Headquarters	Denver, CO USA
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?	Yes
If yes, indicate in which countries your company is participating in MSGs?	SURINAME
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

EITI International Secretariat

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and 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	<ul style="list-style-type: none"> • 2021 Sustainability Report: https://s24.q4cdn.com/382246808/files/doc_downloads/sustainability/2021-report/newmont-2021-sustainability-report.pdf • 2021 Sustainability Report: https://s24.q4cdn.com/382246808/files/doc_downloads/sustainability/2021-report/newmont-2021-sustainability-report.pdf • Sustainability and Stakeholder Engagement Policy: https://s24.q4cdn.com/382246808/files/doc_downloads/2020/11/Sustainability-and-Stakeholder-Engagement-Policy.pdf
Secretariat's assessment on Expectation 1	Expectation met
Secretariat comment	Statement of support published. See URLs for 2021 sustainability report p.31 and 2022 sustainability report p.127-128.



EXPECTATION 2	
Does the company publish a list of controlled subsidiaries?	Yes
URL for controlled list of subsidiaries	https://s24.g4cdn.com/382246808/files/doc_financials/2022/q4/2022-10-K-vFINAL-(2023.02.22)_CLEAN.pdf https://www.newmont.com/sustainability/cdp-crr-and-other-reports/default.aspx https://s24.g4cdn.com/382246808/files/doc_downloads/2022/Newmont-Corporation-ESTMA-Report-FY-2021-A-S-FILED-5.pdf https://s24.g4cdn.com/382246808/files/doc_downloads/2022/sustainability/newmont-2021-tax-report.pdf
EITI implementing countries where the company operates. The countries visible here are based on desk research of EITI Reports.	ARGENTINA, DOMINICAN REPUBLIC, GHANA, MEXICO, PERU, SURINAME
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

<p>Secretariat comment</p>	<p>List of controlled subsidiaries published. See 2022 Form 10-K p. 38-44 and p.5. Information is also available on Newmont's website under CDP and CRR reports, as well as the 2021 ESTMA Report and Taxes and Royalties Contributions Report.</p> <p>Company assessed as making disclosures in accordance with EITI Standard.</p>
<p>EXPECTATION 3</p> <p>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.</p>	
<p>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?</p>	<p>Yes</p>
<p>URL to disclosures of taxes and payments to governments in non-EITI implementing countries</p>	<ul style="list-style-type: none"> • 2021 Sustainability Report - Value Sharing, p. 129: https://s24.q4cdn.com/382246808/files/doc_downloads/sustainability/2021-report/newmont-2021-sustainability-report.pdf • 2021 ESTMA Report: https://s24.q4cdn.com/382246808/files/doc_downloads/2022/Newmont-Corporation-ESTMA-Report-FY-2021-A-S-FILED-5.pdf • 2021 Taxes and Royalties Contribution Report:

	https://s24.q4cdn.com/382246808/files/doc_downloads/2022/sustainability/newmont-2021-tax-report.pdf
Are the disclosures disaggregated by project?	Yes
Secretariat's assessment on Expectation 3	Expectation met
Secretariat comment	Company discloses taxes and payments to governments in non-EITI implementing countries. See URLs. Company indicates new reports are forthcoming mid-2023. Company discloses taxes and payments disaggregated by project. See URLs to Taxes and Royalties Contributions Report and ESTMA Report. The Secretariat did not assess if the project-level disaggregation in non-EITI implementing countries was adequate or not
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	N/A
Secretariat's assessment on Expectation 4	Expectation not applicable
Secretariat comment	Newmont 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.newmont.com/investors/reports-and-filings/default.aspx
Secretariat's assessment on Expectation 5	Expectation met
Secretariat comment	Newmont discloses audited financial statements on the website. 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?	Yes
URL statement of support for beneficial ownership	<ul style="list-style-type: none"> • 2021 Sustainability Report: https://s24.q4cdn.com/382246808/files/doc_downloads/sustainability/2021-report/newmont-2021-sustainability-report.pdf • 2021 Sustainability Report: https://s24.q4cdn.com/382246808/files/doc_downloads/sustainability/2021-report/newmont-2021-sustainability-report.pdf • Sustainability and Stakeholder Engagement Policy: https://s24.q4cdn.com/382246808/files/doc_downloads/2020/11/Sustainability-and-Stakeholder-Engagement-Policy.pdf
Does the company disclose beneficial owners, either directly or according to stock exchange regulations and listing requirements?	Yes



<p>Where disclosures are made according to stock exchange regulations, please provide the name of the stock exchange</p>	<p>Our shares are publicly listed on New York Stock Exchange (NYSE) under the symbol NEM, with a secondary listing on Toronto Stock Exchange (TSX) under the symbol NGT.</p>
<p>URL to stock exchange</p>	<p>https://www.nyse.com/listings_directory/stock; https://www.tsx.com/listings/listing-with-us/listed-company-directory</p>
<p>URL for recent beneficial ownership disclosures</p>	<p>https://www.newmont.com/sustainability/cdp-crr-and-other-reports/default.aspx</p>
<p>Secretariat’s assessment on Expectation 6</p>	<p>Expectation met</p>
<p>Secretariat comment</p>	<p>Newmont publishes a statement of support for beneficial ownership transparency. See URL.</p> <p>The company discloses beneficial owners in line with applicable regulations and listing requirements. A beneficial ownership report can be found on its corporate website, “CDP, CRR & Other Reports”.</p>
<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>Business Integrity Policy: https://s24.q4cdn.com/382246808/files/doc_downloads/2020/11/18/Business-Integrity-Policy.pdf “Our Code of Conduct”: https://s24.q4cdn.com/382246808/files/doc_downloads/about_us/code_of_conduct/2021/Code-of-Conduct-English.pdf Newmont Supplier Code of Conduct webpage: https://www.newmont.com/suppliers/default.aspx EITI statement by companies on beneficial ownership transparency: https://s24.q4cdn.com/382246808/files/document_library/2022/03/EITI_Statement-by-companies-on-beneficial-ownership-transparency_Sept2021.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 URLs. The Secretariat notes that Newmont's “Business Integrity Policy” “Our Code of Conduct” and the “Newmont Supplier Code of Conduct” integrate anti-corruption provisions. The company does not publish standalone policy.</p> <p>Newmont's anti-corruption framework sets out how the company manages corruption risk through the identification and use of beneficial ownership data. Secretariat notes company commits to taking risk-based steps to identify the beneficial owners of joint venture partners, contractors and suppliers, and to avoid partnering or contracting with companies</p>

	<p>assessed as high corruption risk that decline to identify their beneficial owners. See URL Statement by Companies.</p> <p>Company explains it avoids conflicts of interest and prohibits corruption. See URL Business Integrity Policy. See also URL Code of Conduct (PDF p.5). Company employs a Supplier Prequalification Survey to identify risks. See URL Supplier Code of Conduct.</p>
EXPECTATION 8	<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>
Does the company publish a statement of support for contract transparency?	Yes
URL for statement of support for contract transparency	<ul style="list-style-type: none"> Newmont website – CDP, CRR & Other Reports (at the bottom of the page is a section on Contracts): https://www.newmont.com/sustainability/cdp-crr-and-other-reports/default.aspx https://www.icmm.com/en-gb/news/2021/new-commitment-contract-transparency
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>Company publishes statement of support for governments' efforts to publicly disclose contracts and licenses. See URLs.</p> <p>Company assessed to contribute to disclosure of contracts and licenses in EITI implementing countries.</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.
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>People Policy: https://s24.q4cdn.com/382246808/files/doc_downloads/about_us/policies/People-Policy-2020.pdf</p> <p>2021 Sustainability Report: https://s24.q4cdn.com/382246808/files/doc_downloads/sustainability/2021-report/newmont-2021-sustainability-report.pdf</p>
Secretariat's assessment on Expectation 9	Expectation met



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Secretariat comment	Newmont publishes commitment and/or policy on gender diversity. See URL for People Policy. The company discloses employment data disaggregated by gender. See URL for 2021 sustainability report p. 211-213, 216-218.
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