

Assessment of Company Expectations 2025/26

Company adherence to the Expectations for EITI supporting companies

Company name	Newmont
Sector	Mining
Headquarters	Denver, Colorado, United States
Type	Publicly listed
Date of submission to company (month/year)	January 2026
PREAMBLE <i>MSG Participation</i>	<i>Pursuant to the Guidance on the Expectations for EITI supporting companies, companies are encouraged to participate in national EITI multi-stakeholder groups (MSGs). This data is collected for information purposes.</i>
Does the company participate in a multi-stakeholder group?	Yes
If yes, indicate in which countries the company is participating in MSGs?	PAPUA NEW GUINEA SURINAME
Secretariat comment on MSG participation	The Secretariat notes Newmont's engagement in the multi-stakeholder groups (MSG) in PNG and Suriname. The Secretariat thanks the many companies directly and indirectly participating in MSGs in EITI implementing countries and encourages supporting companies to take part in MSGs in the EITI implementing countries in which they operate.
EXPECTATION 1 <i>Public support for the EITI</i>	<i>Publicly declare and publish support for the EITI and the objective of the EITI Association to make the EITI Principles and the EITI Standard the internationally accepted standard for transparency in the oil, gas and mining sectors.</i>

Does the company publish a statement of support for the EITI and the objective of the EITI Association?	Yes
URL for Statement Support	<p>Sustainability and Stakeholder Engagement Policy: https://s24.q4cdn.com/382246808/files/doc_downloads/2020/11/Sustainability-and-Stakeholder-Engagement-Policy.pdf</p> <p>2024 Sustainability Report: https://s24.q4cdn.com/382246808/files/doc_downloads/sustainability/2025/05/Newmont-2024-sustainability-report.pdf</p>
Secretariat's assessment on Expectation 1	Expectation met
Secretariat comment	Statement of support published. See URLs for Sustainability and Stakeholder Engagement Policy, under meaningful engagement and transparency and page 99 of the 2024 Sustainability Report.
EXPECTATION 2 <i>Disclosures in accordance with the EITI Standard</i>	<i>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.</i>
Does the company publish a list of controlled subsidiaries?	Yes
URL for controlled list of subsidiaries	<p>Form 10-K: https://s24.q4cdn.com/382246808/files/doc_financials/2024/q4/Newmont-Corporation-2024-10-K.pdf</p> <p>Exhibit 21.1: https://www.sec.gov/Archives/edgar/data/1164727/000116472725000011/q42024exhibit21.htm</p>
EITI implementing countries where the company operates.	<p>ARGENTINA</p> <p>CHILE</p> <p>DOMINICAN REPUBLIC</p> <p>ECUADOR</p>

	GHANA MEXICO PAPUA NEW GUINEA PERU SURINAME
Does the company make disclosures in accordance with the EITI Standard or in relation to EITI implementing countries?	Yes
Secretariat's assessment on Expectation 2	Expectation met
Secretariat comment	List of controlled subsidiaries published. See URL Form 10-K p.52. Company assessed as making disclosures in accordance with EITI Standard in EITI implementing countries where the company operates.
EXPECTATION 3 <i>Disclosure of taxes and payments in non-EITI implementing countries</i>	<i>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.</i>
Does the company publicly disclose taxes and payments to governments in non- EITI implementing countries where the company operates upstream in the oil, gas and mining sectors?	Yes
URL to disclosures of taxes and payments to governments in non-EITI implementing countries	ESTMA Report 2024: https://s24.q4cdn.com/382246808/files/doc_downloads/2025/Newmont-Corporation-ESTMA-Report-FY2024.pdf Tax and Royalties Contribution Report 2024: https://www.newmont.com/2024-Taxes-Royalties-Contribution-Report

	Sustainability Report 2024: https://s24.q4cdn.com/382246808/files/doc_downloads/sustainability/2025/05/Newmont-2024-sustainability-report.pdf
Are the disclosures disaggregated by project?	Yes
Secretariat's assessment on Expectation 3	Expectation met
Secretariat comment	<p>Newmont discloses taxes and payments to governments in non-EITI implementing countries. See URLs 2024 ESTMA Report, 2024 Tax and Royalties Contribution Report and Sustainability Report 2024 p. 100.</p> <p>The company discloses taxes and payments disaggregated by project. See URLs.</p> <p>The Secretariat did not verify whether project-level disaggregation in all non-EITI implementing countries was adequate, as definitions vary across jurisdictions.</p>
EXPECTATION 4 <i>Commodity trading transparency</i>	<i>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.</i>
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 and reporting guidelines?	N/A
URL for disclosure(s)	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 <i>Disclosure of audited financial statements</i>	<i>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.</i>
Does the company disclose its audited financial statements?	Yes
URL audited financial statements	Form 10-K: https://s24.q4cdn.com/382246808/files/doc_financials/2024/q4/Newmont-Corporation-2024-10-K.pdf
Secretariat's assessment on Expectation 5	Expectation met
Secretariat comment	Newmont discloses audited financial statements. See URL p. 128.
EXPECTATION 6 <i>Beneficial ownership transparency</i>	<i>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.</i>
Does the company publish a statement of support for beneficial ownership transparency?	Yes
URL for statement of support for Beneficial Ownership	Transparency Hub: https://www.newmont.com/sustainability/Disclosure-and-Transparency-Hub/default.aspx Joint Statement on Beneficial Ownership: https://s24.q4cdn.com/382246808/files/document_library/202

	2/03/EITI_Statement-by-companies-on-beneficial-ownership-transparency_Sept2021.pdf
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	New York Stock Exchange, Toronto Stock Exchange, Australia Stock Exchange
URL to stock exchange	Newmont's website: https://www.newmont.com/investors/default.aspx NYSE: https://www.nyse.com/quote/XNYS:NEM TSX: https://money.tmx.com/quote/NGT ASX: https://www.asx.com.au/markets/company/NEM
URL for recent beneficial ownership disclosures	Beneficial Ownership in JVs 2024: https://s24.q4cdn.com/382246808/files/doc_downloads/2025/04/eiti-beneficial-ownership-jv-interests-ye-2024-version-21-March.pdf
Secretariat's assessment on Expectation 6	Expectation met
Secretariat comment	Newmont publishes a statement of support for beneficial ownership transparency. See URLs. The company discloses beneficial owners in line with applicable regulations and listing requirements. Newmont are publicly listed on three stock exchanges. See URLs NYSE, TSX, ASX. Additionally, Newmont publishes a beneficial ownership report of their joint ventures for 2024. See URL.
EXPECTATION 7	<i>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</i>

<p>Due diligence processes and anti-corruption policies</p>	<p><i>collects and takes risk-based steps to use beneficial ownership data regarding joint venture partners, contractors, and suppliers in its processes.</i></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</p> <p>Code of Conduct: https://s24.q4cdn.com/382246808/files/doc_downloads/about_us/code_of_conduct/2021/Code-of-Conduct-English.pdf</p> <p>Supplier Code of Conduct webpage: https://www.newmont.com/suppliers/default.aspx</p> <p>Joint Statement on Beneficial Ownership: https://s24.q4cdn.com/382246808/files/document_library/2022/03/EITI_Statement-by-companies-on-beneficial-ownership-transparency_Sept2021.pdf</p> <p>Sustainability Report 2024 https://s24.q4cdn.com/382246808/files/doc_downloads/sustainability/2025/newmont-2024-sustainability-report.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>Newmont publishes an anti-corruption framework through multiple documents, including its Business Integrity Policy, Code of Conduct and Supplier Code of Conduct. See URLs.</p> <p>The company's anti-corruption sets out how the company manages corruption risk, including through use of beneficial ownership data. The Business Integrity Policy applies globally to all</p>

	<p>directors, employees, and third-party workers across all phases of the mine life cycle. Anti-corruption provisions extend to vendors and business partners where contractually specified.</p> <p>In the policies, Newmont prohibits bribery and facilitation payments and notes the company adheres to the U.S. Foreign Corrupt Practices Act, the UK Anti-Bribery Act, and the World Economic Forum’s PACI principles. Newmont commits to identifying beneficial owners of joint venture partners, contractors, and suppliers. It avoids partnerships with entities assessed as high corruption risk that refuse to disclose ownership. See URL Joint Statement on Beneficial Ownership pg. 2</p> <p>A Supplier Prequalification Survey is used to assess corruption risks. Internal and external assessments are conducted to evaluate the effectiveness of integrity and compliance programs.</p>
<p>EXPECTATION 8 Contract transparency</p>	<p><i>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.</i></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>ICMM Joint Statement: https://www.icmm.com/en-gb/news/2021/new-commitment-contract-transparency</p> <p>Contract Disclosures PDF: https://s24.q4cdn.com/382246808/files/doc_downloads/contracts/2025/eiti-contracts-2024-version-21-March.pdf</p> <p>Disclosure and Transparency Hub: https://www.newmont.com/sustainability/Disclosure-and-Transparency-Hub/default.aspx</p>
<p>Does the company contribute to public disclosure of contracts and licenses in EITI-implementing countries consistent with government procedures?</p>	<p>Yes</p>

Secretariat's assessment on Expectation 8	Expectation met
Secretariat comment	<p>As an ICMM member, the Secretariat notes that the company subscribes to ICMM's collective statement of support for contract transparency.</p> <p>Additionally, Newmont publishes its own 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 Gender Diversity	<i>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.</i>
Does the company publish a commitment/policy on gender diversity?	Yes
URL for commitment/policy on gender diversity	<p>People Policy: https://s24.q4cdn.com/382246808/files/doc_downloads/about_us/policies/People-Policy-2020.pdf</p>
Does the company disclose employment data disaggregated by gender?	Yes
URL for gender disaggregated employment data	<p>Sustainability Report 2024: https://s24.q4cdn.com/382246808/files/doc_downloads/sustainability/2025/05/Newmont-2024-sustainability-report.pdf</p>
Secretariat's assessment on Expectation 9	Expectation met
Secretariat comment	<p>Newmont publishes commitment and/or policy on gender diversity. See URL People Policy.</p> <p>The company discloses employment data disaggregated by gender. See URL Sustainability Report 2024 p. 51</p>