

Findings as of August 2025

US corporate human rights index: Tracking changes in company commitments to human rights

Newmont

| Indicators | Finding | Source | Source Link |
|--|--|---|--|
| Policies and commitments | | | |
| <i>General</i> | | | |
| Human rights policy - UNGPs | <p>Newmont integrates our commitment to respecting human rights throughout our policies, practices and expectations. Aligned with the UN Guiding Principles on Business and Human Rights ("Guiding Principles"), our Code of Conduct (the "Code") underscores our commitment to respect the human rights of every individual. Our Sustainability and Stakeholder Engagement Policy explicitly commits to respecting the dignity, wellbeing and rights of employees, those in the communities where we operate and others affected by our activities.</p> <p>Supporting the policy is our Human Rights Standard, which details site-specific requirements for effective human rights risk management. Several other global standards address specific human rights matters, such as cultural heritage, environmental resource protection, security, engagement with Indigenous Peoples, and impacts on livelihoods and the environment.</p> | Our Approach to Human Rights (Updated March 2025) | https://s24.q4cdn.com/382246808/files/doc_downloads/priority-topics/newmont-approach-to-human-rights.pdf |
| Human rights policy - ILO Core Labor Standards | <p>We uphold workers' rights in alignment with the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work. Our commitment is outlined in various Newmont policy documents:</p> <ul style="list-style-type: none"> • Employment Standard, prohibiting child, forced or bonded labor. • Standard of Conduct and Non-Discriminatory Treatment in Employment, providing a harassment-free and non-discriminatory work environment. • Labor Relations Standard, respecting employees' rights to freedom of association and collective bargaining. • Supplier Code of Conduct, setting minimum standards for suppliers, including respecting freedom of association and prohibiting forced labor, child labor and discrimination. | Our Approach to Human Rights (Updated March 2025) | https://s24.q4cdn.com/382246808/files/doc_downloads/priority-topics/newmont-approach-to-human-rights.pdf |
| Forced labor & prison labor | See above | | |
| Human rights defenders & civic space | <p>Our core values of integrity and responsibility also drive our commitment to respect the rights of those advocating for human rights. We do not tolerate threats, intimidation, violence, surveillance, punitive action or attacks (both physical and legal) against human rights defenders, including those exercising their rights to freedom of expression, association, peaceful assembly or protest against Newmont or our operations. We expect our business partners to share this commitment. While we may not always agree with human rights defenders' positions, we believe an active and open civil society, supported by the rule of law, is essential.</p> | Our Approach to Human Rights (Updated March 2025) | https://s24.q4cdn.com/382246808/files/doc_downloads/priority-topics/newmont-approach-to-human-rights.pdf |
| Gender equality and women's empowerment | <p>Recognizing the low representation of women at the operational level, we initiated conversations between Newmont's Operations Leadership Team and women to better understand their experiences. Feedback from these sessions helped us identify and address symbols of exclusion and led to the development of business unit and site strategies. [Our Approach to Human Rights]</p> <p>Signatory of Women Empowerment Principles [Webpage - WEPs]</p> | Our Approach to Human Rights (Updated March 2025) Webpage - WEPs | https://s24.q4cdn.com/382246808/files/doc_downloads/priority-topics/newmont-approach-to-human-rights.pdf https://www.weps.org/companies |
| Indigenous Peoples | <p>Newmont recognizes the unique rights, culture, and history of Indigenous Peoples, and that they have distinct interests and concerns that differ from or are in addition to those of other stakeholder groups. We acknowledge and respect traditional landownership and uses. Newmont adheres to the International Council on Mining and Metals' (ICMM) 2013 Position Statement on Indigenous Peoples, which requires that we will work to obtain the consent of indigenous peoples when a project is located on land they traditionally own or use, and is likely to cause impact on them.</p> | Indigenous Peoples Standard (1/14/2020) | https://s24.q4cdn.com/382246808/files/doc_downloads/2020/03/indigenous-Peoples-Standard.pdf |

Natural resources

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| Conflict minerals | Achieving Newmont Corporation's ("Newmont") purpose to create value and improve lives through sustainable and responsible mining requires us to demonstrate that our gold has been extracted in a manner that does not knowingly cause, support or benefit unlawful armed conflict or contribute to human rights abuses or breaches of international humanitarian law. Newmont takes this responsibility seriously and has implemented the World Gold Council's (WGC's) Conflict-Free Gold Standard (the "Standard") since 2013. Our commitment to the Standard is available on our website. This Conflict-Free Gold Report summarizes how Newmont conformed to the requirements of the Standard for the calendar year ended December 31, 2024. | 2024 Conflict-Free Gold Report (May 2025) | https://s24.q4cdn.com/382246808/files/doc_downloads/sustainability/2025/2024-Conflict-Free-Gold-Report.pdf |
| No deepsea mining | No evidence | | |
| Land rights | We ensure that the rights and needs of landowners and local communities are assessed and addressed prior to any activities involving land acquisition and resettlement. Land acquisition is conducted in compliance with applicable laws, regulations, and international best practice as defined by International Finance Corporation (IFC) Performance Standard 5 and specific requirements on resettlement, compensation, and/or livelihood restoration activities. | Sustainability and Stakeholder Engagement Policy | https://s24.q4cdn.com/382246808/files/doc_downloads/2020/11/Sustainability-and-Stakeholder-Engagement-Policy.pdf |
| Free, Prior, and Informed Consent (FPIC) | We recognize the individual and collective rights and interests of Indigenous Peoples in line with the ILO Convention 169 and UN Declaration on the Rights of Indigenous Peoples. We work to obtain free, prior, and informed consent of Indigenous Peoples as reflected in the ICMM Position Statement, formalizing this consent in agreements where possible. We commit to designing programs to benefit Indigenous Peoples in a participative manner and implementing preferential local employment and procurement programs for the traditional owners of the land on which we conduct mining activities or who reside near our operations. We aim to create an inclusive environment through cultural norms training of staff and on-site contractors. | Sustainability and Stakeholder Engagement Policy | https://s24.q4cdn.com/382246808/files/doc_downloads/2020/11/Sustainability-and-Stakeholder-Engagement-Policy.pdf |
| <u>Living wage</u> | | | |
| Living wage, own operations | Newmont partners with third-party expert BSR to conduct living wage analyses in all countries with full-time employees. The analyses compare the compensation of Newmont's lowest-paid employees to the amount needed to maintain a household above a living wage. As a commitment to our values, we will conduct the living wage study on an annual basis. [Our Approach to People and Culture] | Our Approach to People and Culture (updated March 2025) | https://s24.q4cdn.com/382246808/files/doc_downloads/priority-topics/newmont-approach-to-people-and-culture.pdf |
| Living wage in supply chain | In 2022, we began work with BSR, an external sustainability group whose team of human rights experts supports clients in meeting and exceeding global human rights standards. BSR is contributing expertise and data on living wages to support Newmont in implementing a program for full, part-time and temporary employees. In addition, input and guidance related to the extension of a living wage commitment to contractors and suppliers will be provided. | Respecting Human Rights: Our Approach (May 2022, pg 18) | https://s24.q4cdn.com/382246808/files/doc_downloads/sustainability/2022/newmont-human-rights-approach-2022.pdf |
| <u>Human rights due diligence and supply chain</u> | | | |
| Process for assessing human rights risks and impacts | Our Human Rights Standard requires ongoing human rights risk management at all sites. For new projects or significant operational changes, sites must integrate human rights evaluations into their impact or risk assessments. Standalone human rights impact assessments may be considered under certain circumstances. Assessments are required to identify and evaluate the actual and potential human rights impacts resulting from both our sites' activities and our business relationships, including our supply chain. | Our Approach to Human Rights (Updated March 2025) | https://s24.q4cdn.com/382246808/files/doc_downloads/priority-topics/newmont-approach-to-human-rights.pdf |
| Heightened human rights due diligence in Conflict Affected and High Risk Areas (CAHRAs) | See conflict minerals | | |
| Affected stakeholder engagement | Engaging with affected stakeholders is also important in evaluating the effectiveness of our mitigation plans. For example, several sites have developed participatory community environmental monitoring programs, particularly focused on water. These programs support transparency and build credibility with stakeholders by establishing formal committees or groups that include representatives from Newmont, members of the community, and local authorities who are trained in environmental monitoring and analysis . . . Examples of risk mitigation measures and engagement . . . Engagement with local governments and project-affected community stakeholders. | Our Approach to Human Rights (Updated March 2025) | https://s24.q4cdn.com/382246808/files/doc_downloads/priority-topics/newmont-approach-to-human-rights.pdf |

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| Human rights requirements in supplier code/requirements | <p>Newmont is committed to implementing the human rights and labor principles of the United Nations Global Compact through its operations and supply chain. Accordingly, we require our suppliers to respect internationally proclaimed human rights and make sure that they are not complicit in human rights abuses; respect the labor rights of their employees, including freedom of association and the right to collective bargaining; prohibit all forms of forced and compulsory labor; not engage in child labor; not discriminate in employment and occupation; and prohibit any form of discrimination and harassment. These fundamental human rights are to be respected both within their own and within their affiliates' operations and supply chains.</p> <p>Our Supplier contracts include human rights clauses around: respecting human rights consistent with the Universal Declaration of Human Rights, disclosure of human rights violations, and alerting Newmont to any human rights issues Suppliers become aware of within their own or their affiliates operations or the operations of their own or their affiliates' supply chains.</p> | Webpage - Governance and Ethics, Supplier Code of Conduct | https://www.newmont.com/about-us/governance-and-ethics/default.aspx |
| Access to remedy | | | |
| Grievance mechanism for own employees | <p>Processes for addressing any adverse human rights impacts are crucial for building trust, resolving issues and proactively addressing concerns. Newmont provides three primary channels for stakeholders, both internal and external, to raise human rights concerns:</p> <ol style="list-style-type: none"> 1. Engaging in an internal discussion with Newmont's People representatives or managers. 2. Formally registering a matter through local complaints and grievances registers, a mechanism required at all sites to address stakeholder concerns transparently and promptly. 3. Filing a case online or via phone through the Business Integrity Helpline, a confidential channel for reporting potential Code of Conduct violations, including human rights issues, which is available in over 60 languages, with local dial-in numbers available for many countries and the option of a reverse charge call where local numbers are not available. | Our Approach to Human Rights (Updated March 2025) | https://s24.q4cdn.com/382246808/files/doc_downloads/priority-topics/newmont-approach-to-human-rights.pdf |
| Grievance mechanism for workers - supply chain | See above | | |
| Grievance mechanism for external individuals & communities | See above | | |
| Governance and staffing | | | |
| Board and/or C-Suite-level oversight | <p>Management formally reviews our human rights performance with the Board of Directors' Safety and Sustainability Committee at least once a year. Senior management and the Safety and Sustainability Committee also review salient human rights topics quarterly, including compliance with recognized global standards, emerging risks and escalated complaints – such as those related to land disputes, security events, community interactions and others – having potential human rights implications. The committee chair apprises the full Board of any significant matters or developments. For major transactions (mergers, acquisitions or divestments), the Board also reviews human rights risks as part of our due diligence approach regarding changes to our business strategy and model.</p> | Our Approach to Human Rights (Updated March 2025) | |
| Senior level responsibility for human rights | <p>To embed respect for human rights throughout the company, ownership and accountabilities reside in various functions. For example, our People function ensures we uphold employees' rights to freedom of association and collective bargaining, pay a living wage and enforce nondiscriminatory treatment in employment. Our Legal department oversees human rights contract clauses to mitigate risks with our business partners, while our Supply Chain department implements systems to identify risks in our supply chain related to modern slavery and child labor. We also have cross-functional human rights working groups at the enterprise and regional/site levels, with the regional/ site working groups overseeing compliance with our Human Rights Standard and the implementation of human rights management plans. All business units are required to have working groups with cross-functional accountability for human rights risk management. Overall responsibility for our human rights approach resides with the Group Head for External Relations and Social Performance. This role reports to the Chief Sustainability and Development Officer, who reports to the President and CEO.</p> | Our Approach to Human Rights (Updated March 2025) | https://s24.q4cdn.com/382246808/files/doc_downloads/priority-topics/newmont-approach-to-human-rights.pdf |
| Reporting and transparency | | | |
| Human rights reporting (integrated or stand-alone) | Integrated in Sustainability Report | 2024 Sustainability Report | https://s24.q4cdn.com/382246808/files/doc_downloads/sustainability/2025/05/Newmont-2024-sustainability-report.pdf |
| Memberships | | | |
| RBA | No | RBA | https://www.responsiblebusiness.org/about/members/ |
| RMI | Yes | RMI | Members |
| IRMA | No | IRMA | Members / Partners - IRMA - The Initiative for Responsible Mining |
| ICMM | Yes | ICMM | ICMM - Our Members |
| EITI | Yes | EITI | https://eiti.org/companies |
| VPI | Yes | VPI | https://www.voluntaryprinciples.org/the-initiative/ |

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| WEPs (signatory) | Yes | WEPs (signatory) | https://www.weps.org/companies |
| Lobbying and ethics | | | |
| Public statement or endorsement in support of mandatory human rights and environmental due diligence | No evidence | | |
| Anti-bribery and anti-corruption policy | <p>This Policy reflects Newmont's commitment to business integrity. It requires all those engaged in activities on our behalf to work honestly and in the best interests of the Company, to avoid corruption and bribery of any kind, and to ensure compliance with various relevant legal requirements. It also requires those involved in reporting information about Newmont to do so appropriately and in a timely and accurate manner. [Business Integrity Policy]</p> <p>Our Supplier contract provisions are consistent with the requirements of the World Economic Forum's Partnering Against Corruption Initiative (PACI), of which Newmont is a founding member, the U.S. Foreign Corrupt Practices Act and the UK Anti-Bribery Act. These prohibit the provision or offering of anything of value to government officials, representatives, political parties or third parties for the purpose of influencing any act or decision in violation of the recipient's lawful duty or securing or attempting to secure an improper legal or commercial advantage. They also require the operation of effective controls and the maintenance of accurate books and records. . . [Webpage - Governance and Ethics, Supplier Code of Conduct]</p> | <p>Business Integrity Policy</p> <p>Webpage - Governance and Ethics, Supplier Code of Conduct</p> | https://s24.q4cdn.com/382246808/files/doc_downloads/about_us/governance_and_ethics/Policy_BusinessIntegrity_28Apr2014.pdf https://www.newmont.com/about-us/governance-and-ethics/default.aspx |

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