ADVANCING.
TOGETHER.

2018 HUMAN RIGHTS REPORT
BARRICK’S HUMAN RIGHTS APPROACH

Barrick maintains a fundamental respect for the human rights of its employees and every individual and community affected by its operations. We will not tolerate violations of human rights committed by employees, affiliates, or any third parties acting on our behalf or related to any aspect of a Barrick operation.
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2017 HIGHLIGHTS

- **100%** Of our people receive basic human rights training during their induction.
- **7,350** People who received human rights training.
- **259** Grievances from communities received.
- **100%** Of medium- and high-risk sites have been independently assessed for human rights impacts.
- **100%** Of security personnel received in-person human rights training.
- **8** Years since Barrick introduced its human rights compliance program.
- **6** Identified salient human rights risks.
- **40%** Of mine-site compensation linked to sustainability and compliance (including human rights) indicators.
- **5** Core principles of Barrick’s Human Rights Compliance Program.
At Barrick, we have made a straightforward yet profoundly complex and important commitment: To respect human rights where we do business and to recognize the equality and dignity of the people with whom we interact every day.

We are compelled to make this commitment because we work in diverse social, economic, and political contexts, often for decades, and ultimately become part of society's fabric. We know that our activities, and of those with whom we do business, can both promote and negatively impact human rights. We embrace our responsibility – and the opportunity – to contribute to realizing human rights for tens of thousands of people around the world.

In making this commitment, we know we have created expectations to demonstrate, to ourselves and others, whether and how we are meeting it. In fact, this is one of the most important reasons for setting our commitment in the first place – to activate and sustain action.

This Human Rights Report is an important way to bring all of this together, but it is not without its challenges. We recognize the importance of being transparent in our approach to human rights. We believe that human rights can best be protected when entities like ours openly share their learnings and approaches, and engage in frank dialogue about the challenges they continue to face. We also believe, as our Executive Chairman has stated, that Barrick’s partnership culture rests on a foundation of trust, which in turn rests on transparency and doing what we say we will do.

At the same time, it is difficult to provide a report detailing our activities without sounding self-congratulatory. It is true that the women and men in our workforce have worked hard and partnered with local communities and civil society organizations to develop a mature global human rights program. They all should be proud of what has been accomplished so far. However, this also must be tempered with humility since there continue to be times where we have not met the standards we set for ourselves.

In that vein, we remain preoccupied with the human rights challenges we see around us – from the increasing expectations rightly placed on multi-national companies, to the persistent human rights dilemmas that arise at our mine sites, to highly troubling reports about global attacks on human rights defenders, to our persistent desire to improve the human rights landscape in our spheres of influence. Our focus is less on what we have done and more about what we can do better.

With that in mind, the aim of this report is quite simple. It details the philosophy of our human rights program, our salient human rights risks and how we are managing them, and how we have put into practice the simple commitment that underlies our approach to human rights: To respect human rights wherever we do business and to recognize the equality and dignity of the people with whom we interact every day.

Jonathan Drimmer
Chief Compliance Officer
Our goal in producing this report is to introduce stakeholders to how our Company thinks about human rights, explain the steps that we have taken to respect human rights, and describe how we operationalize this commitment across our global business operations. It also defines our salient risks – those areas where we believe our activities and operations are most likely to create negative impacts. This report is an update to Barrick’s 2017 Human Rights Report and includes more recent data on our performance and progress.

The report is divided into two parts. Section one provides a detailed description of our global Human Rights Compliance Program. Section two addresses the salient human rights risks and explains how they are being addressed through the human rights program itself.
$2+ B  Operating Cash Flow in 2017

5.32 MOZ  Gold production in 2017

11 COUNTRIES  with operating mines and projects in 2017

10,000+ People directly employed in 2017

13,000+ Contractors in 2017

BARRICK AT A GLANCE

Donlin Gold JV (50%)
Hemlo
Golden Sunlight
Turquoise Ridge JV (75%)
Barrick Nevada
Lagunas Norte
Zaldivar JV (50%)
Norte Abierto JV* (50%)
Pascua-Lama*

Pueblo Viejo JV (60%)

Veladero JV (50%)

Jabal Sayid JV (50%)

North Mara
Buzwagi
Buyanhuulu

Lumwana

KCGM JV (50%)

Porgera
JV (47.5%)

Head Office  Barrick Operated  JVs not operated by Barrick  Partner Operated JVs  Affiliate

* Projects
In late 2010, we began to create a standalone human rights program at Barrick. The program has since grown and evolved substantially, maturing through changes to our operating structure, acquisitions and dispositions, evolving international norms, and learnings we have gained from experience, collective action and partnerships.

The program is comprehensive, global, and integrated into our management systems. It extends throughout our workforce and into our first tier of suppliers, thousands of whom have accepted our Supplier Code of Ethics and its ethical requirements.

While we continue to face human rights dilemmas that defy easy answers, we are meeting many of the goals that we set when the program was first conceived. Our regular assessments are telling us that we are on the right path in having human rights recognized as a core value throughout the Company. For instance, as part of our 2016 testing of management controls, 98 percent of our people demonstrated an understanding of the basic aspects of our Human Rights Policy, and 100 percent understood their duties and responsibilities under the Policy and our Code of Business Conduct and Ethics.

Similarly, the international assessment and inspection firm Bureau Veritas, as part of its 2016 report on Barrick’s compliance with the International Council on Mining and Metals (ICMM) Sustainable Development Principles, observed, “The focus on human rights training has resulted in a continued growing awareness of human rights and Barrick’s Human Rights Policy among Barrick employees and contractors.” In its 2017 report, Bureau Veritas further noted that “Barrick demonstrates a commitment to implementing and maintaining the respect for human rights and the Voluntary Principles on Business and Human Rights (VPs).”

Of course, we face obstacles in operationalizing some aspects of our programs, including with new hires and position changes. But there are no more questions about the importance of human rights, and about our fundamental expectation that our people, contractors and suppliers will do the right thing all the time, in every situation.

We also try to be transparent with our learning, sharing our successes, failures, and program features in a range of fora. In so doing, we have formed, joined and led numerous initiatives and multi-stakeholder working groups, actively trying to advance human rights in the business community and beyond, sharing examples of our progress and our challenges.

An example of the transformative thinking arising from our human rights program relates to the Porgera mine in Papua New Guinea. One of the Company’s greatest challenges, and a key motivating factor in developing our human rights program, was addressing historical sexual violence at Porgera.3 In May 2010, the NGO Human Rights Watch alerted Barrick and its then majority-owned affiliate, the Porgera Joint Venture (PJV), to a series of claims alleging violence against women, including rape, in and around the mine site by PJV security personnel. In response, Barrick and the PJV initiated internal and independent inquiries, which involved extensive documentary analysis and some 700 interviews, including with the vast majority of the mine’s Asset Protection Department (APD) and Community Affairs Department. The investigation revealed evidence of multiple instances of potential criminal conduct, including sexual assaults, by former and then-current members of the APD. Following the investigation, the PJV terminated and disciplined numerous personnel, supported police investigations, and engaged in an extensive set of policy, personnel, and procedural changes at the site.

For Barrick, these events were not only deeply disturbing, they were also confounding and transformative. The Company had
long prided itself on being socially responsible. Coming to accept the conclusions of our own and Human Rights Watch’s reviews at Porgera was identity-changing; we were not the Company we thought we were.

The Porgera Remedy Framework was launched in October 2012 to provide remedy to the victims following 18 months of extensive consultation with local, national, and international experts in human rights. Operating in an extremely difficult context, the Framework – the first of its kind – ran for more than two years and provided remedies to 119 women. While an independent review found the Framework had several implementation challenges, it also found the Framework’s design was “meticulous” in its attention to claimants’ rights and described the remedies provided as “generous … rights-compatible, and from the perspective of compensation under human rights law, complete.”

Today, with our human rights program firmly in place, we are not seeing many significant negative human rights impacts at our operations, and certainly no impacts reflective of the incidents at Porgera. At Porgera itself, there have been no credible allegations of similar abuses by PJV security personnel since 2010. However, these tragic events continue to serve as a critical reminder of the life-altering impacts our operations can have, and of the need for constant and consistent effort to implement our human rights program.

What We Have Learned

We cannot take for granted that people will act ethically. The onus is on companies to hire people with integrity, to assess whether contractors and suppliers accept and share our values, to develop systems and processes to prevent human rights violations, and to continually reinforce expectations and conduct training on how we implement those expectations. It takes persistent hard work and dedicated efforts to limit negative human rights impacts for any company, especially a multi-national enterprise like ours.

We have learned that we need to seek creative answers, be willing to try new approaches, seek advice from those who have addressed similar situations, share our experiences with others, and engage in collective action to pursue larger changes.

Human rights dilemmas will persist. Certainly, having a comprehensive human rights program in place is an important start. But it is only a start and any human rights program will inevitably confront challenges that have no obvious and simple solutions, such as providing remedies for historical human rights violations, enabling access to potable water, or protecting workers from sexual harassment. We have learned that we need to seek creative answers, be willing to try new approaches, seek advice from those who have addressed similar situations, share our experiences with others, and engage in collective action to pursue larger and more lasting changes.

We must listen to a range of voices. As is true of many multi-national companies, our programs and activities have generated substantial comment, wide-ranging advice, and strongly expressed viewpoints from numerous actors. While we do not always agree with those comments and views, they compel us to continue to closely examine our behaviors, approaches, and programs and determine where they can be strengthened and improved. With that learning in mind, for publication in this report, we invited prominent individuals and civil society organizations to share their views on a particular human rights topic of their choosing.

Joint ownership is essential to operationalize the program. Well before we began developing our formal human rights program, our relevant functional units, such as our Security, Environment, and Safety and Health groups, maintained detailed policies and procedures and management
systems. When implemented as designed, these protocols limited negative human rights impacts, but none of them expressly considered human rights, per se. Embracing a global human rights approach meant reviewing how each functional unit around the globe may impact human rights, both positively and negatively. It meant adjusting procedures in light of human rights concerns, educating relevant personnel about how they may affect human rights, and vesting personnel with relevant accountabilities and responsibilities. We have learned that respecting human rights is a shared global responsibility, belonging to every person and group in the Company.

Looking Forward

These insights and the many others we have gained from the first eight years of our human rights program will help animate our thinking for the program’s next years. While we maintain numerous goals and priorities, we continue to put particular thought into the following four areas. Our progress to date in these areas is described on page 15.

1. **Enhance the program in relation to vulnerable groups.** These include children, indigenous populations, women, national minorities, and human rights defenders, who are most prone to confrontations and least able to defend against them. This is true whether they are youths facing security incidents, indigenous peoples whose land is affected without consent, women who face sexual harassment, pay inequality and other workplace discrimination, or defenders who face attacks when they stand up for people whose rights and fundamental freedoms are threatened. To better prevent and mitigate those impacts requires further development of our policies, greater due diligence, rigorous and thoughtful program implementation, and collective action.

2. **Improve our ability to measure program effectiveness.** Our human rights policies and procedures are clear. So too are our assessments to determine the extent to which they are being implemented and whether we are causing, contributing, or being directly linked to actual, potential or perceived negative impacts. We are continuing to consider different ways to gather objective, quantifiable information about the effectiveness of our programs and how to report publicly on these measurements. As measuring negative impacts avoided is a complex undertaking, we are seeking to identify new ways of assessing effectiveness.

3. **Consider ways to maximize our impacts in promoting respect for human rights in business relationships where we have limited leverage.** This may include joint ventures, partnerships, and other affiliations where we lack operational control. These ownership structures are becoming increasingly common in the mining sector, given the tremendous expense associated with purchasing an existing mine, or building or operating a new one. Other instances where we have limited leverage may include commercial entities in our value chain, as well as government agencies who oversee our operations, provide us with security, maintain law and order and the rule of law – and yet through their activities can create risks of negative impacts. While we have sought to incorporate the core of our human rights expectations into these situations of limited leverage, and they have influenced our selection of partners and operating approach in different ways, our success has been mixed. Additional thought and effort in conjunction with other companies, academics, civil society, and local communities are important and needed.

4. **Look for strategic opportunities to affirmatively advance human rights within our spheres of influence.** Businesses like ours must respect human rights. We also have an opportunity to be agents of change. That can be done through engaging with governments to advance public policy in a socially responsible manner. It can be done by empowering a workforce to identify indicators of human rights violations in local communities and to take action. Yet another way is by empowering local communities to understand the scope and nature of their human rights, how to access resources to help protect them, and how to judge whether our sites are meeting our stated human rights goals and obligations.
Concluding Thoughts

Nearly seven years after it was conceived, our human rights program is accepted throughout the organization and integrated into the way we do business. Yet the origins of the program, and the endemic challenges we continue to face each day, compel us to maintain our efforts unabated. We accept, as we must, that we will continue to face human rights dilemmas that lack simple or straightforward solutions, and that the solutions we implement may not be perfect. But we also recognize that businesses like ours can collectively learn from our successes and failures, and we will keep trying to improve our performance as we work to fulfill our duty to respect human rights and identify strategic opportunities to improve human rights everywhere we do business. It is with that spirit in mind that we provide this update to our Human Rights Report.

Businesses like ours must respect human rights. We also have an opportunity to be agents of change.
BARRICK’S HUMAN RIGHTS COMPLIANCE PROGRAM

Core Principles

14  Grounded In Global Standards

14  Leadership from the Top

14  Embedded Throughout the Organization

14  Shared Learning

14  Partnership and Collaboration
About the Program

Barrick’s Human Rights Compliance Program was launched in 2011 to help us meet our commitment to respect human rights everywhere we operate. The program includes training, onboarding and oversight of our people and third parties, operational due diligence, grievance mechanisms and remediation approaches, and other components.

We know that no program can eliminate all negative impacts that we may cause, contribute to, or be linked to through our operations. However, we believe that through a holistic and systematic approach, we are in a better position to mitigate those risks, and to remedy any adverse impacts where they may arise.

As the diagram below summarizes, five core principles underpin and help guide our Human Rights Compliance Program, which is organized into six separate categories. The program, in turn, helps us prevent or mitigate negative human rights impacts, including in the six areas where we have identified salient risks.

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As a fundamental operating principle, we try to respect human rights wherever we do business and recognize the equality and dignity of the people with whom we interact every day. Respect for our people, local community members, and local governments is part of our core values, which guide us in all we do.

Carrying out that respect every day, in every situation, everywhere we operate, poses challenges for a global company like ours. We have interests in mining operations on five continents, employ more than 11,000 workers, have some 11,000 contractors, and work with some 10,000 vendors each year. Our mines operate in highly diverse social, economic and political environments, including locations where human rights may not be fully recognized or protected. Each location has a different cultural context, faces different risks of negative human rights impacts, and encounters different expectations from their respective host communities, governments, and key stakeholders.

Barrick’s human rights compliance program is designed to help embed ethical behavior and a respect for our people and partners throughout our diverse operations. On a philosophical level, the compliance program is not a risk mitigation effort for the company; rather, it is a reflection of the company’s values and an outgrowth of our commitment to respect human rights and avoid negative human rights impacts for rights holders.

To create a global program, we have defined five core principles that guide our human rights approach:

- Grounded in Global Standards
- Leadership from the Top
- Embedded Throughout the Organization
- Shared Learning
- Partnership and Collaboration.
Our human rights program is grounded in international human rights norms, including the International Bill of Human Rights and the eight core conventions of the International Labor Organization, and guided by the UN Guiding Principles on Business and Human Rights, the 10 Principles of the UN Global Compact, and similar standards. Internally, we treat human rights norms as obligatory and non-optional, like the laws we are subject to, wherever we operate. We believe that only through a globally integrated human rights compliance program can we meet our responsibility to respect the human rights of all our stakeholders.

Respecting human rights is a shared global responsibility. We have worked hard to integrate human rights considerations into Barrick’s values, governance frameworks and the corporate management systems of different functional units. From Supply Chain and Human Resources to Security and Community Relations, when human rights elements are entrenched within day-to-day job performance to the point that they are indistinguishable from other aspects of work activities, they are truly operationalized and sustainable.

We continue to face human rights dilemmas that defy easy answers. Addressing them is only possible in partnership and collaboration with our peers, business partners, and other stakeholders. While we may not always agree with our critics, we are committed to listening to their concerns and learning from their ideas. Through global multi-stakeholder initiatives such as the Voluntary Principles on Security and Human Rights (VPs), and through our community engagement at the local level, we work to advance respect for human rights both in our own operations and among the broader business community.

THE FIVE CORE PRINCIPLES OF THE HUMAN RIGHTS COMPLIANCE PROGRAM

- **Grounded in Global Standards**
  Our human rights program is grounded in international human rights norms, including the International Bill of Human Rights and the eight core conventions of the International Labor Organization, and guided by the UN Guiding Principles on Business and Human Rights, the 10 Principles of the UN Global Compact, and similar standards. Internally, we treat human rights norms as obligatory and non-optional, like the laws we are subject to, wherever we operate. We believe that only through a globally integrated human rights compliance program can we meet our responsibility to respect the human rights of all our stakeholders.

- **Leadership From the Top**
  We believe that every person in every functional unit plays a role in respecting the human rights of our people, contractors and community members. At the same time, leadership from the top is essential to the program’s success, including emphasizing the importance of the Program and the values that underlie it, and reflecting those values in practice.

- **Embedded Throughout the Organization**
  Respecting human rights is a shared global responsibility. We have worked hard to integrate human rights considerations into Barrick’s values, governance frameworks and the corporate management systems of different functional units. From Supply Chain and Human Resources to Security and Community Relations, when human rights elements are entrenched within day-to-day job performance to the point that they are indistinguishable from other aspects of work activities, they are truly operationalized and sustainable.

- **Shared Learning**
  To improve our own practices and to advance business respect for human rights, we are committed to sharing our successes, failures, and program features. We have formed, joined, and led initiatives and working groups focused on dialogue and mutual learning, such as the BSR Human Rights Working Group and the UN Global Compact, actively trying to advance human rights in the business community and offering examples of how it can be done and pitfalls to be avoided.

- **Partnership and Collaboration**
  We continue to face human rights dilemmas that defy easy answers. Addressing them is only possible in partnership and collaboration with our peers, business partners, and other stakeholders. While we may not always agree with our critics, we are committed to listening to their concerns and learning from their ideas. Through global multi-stakeholder initiatives such as the Voluntary Principles on Security and Human Rights (VPs), and through our community engagement at the local level, we work to advance respect for human rights both in our own operations and among the broader business community.
**Principle in Practice** As a member of the International Council on Mining and Metals (ICMM), we are committed to conducting business in accordance with the ICMM's Sustainable Development Principles, which include a commitment to upholding fundamental human rights and respecting culture, customs, and values in dealing with our people and others affected by our activities.

**Principle in Practice** The Board of Directors approved our Human Rights Policy and Code of Business Conduct and Ethics. The Corporate Responsibility Committee of the Board oversees our Human Rights Program, receiving quarterly briefings. Executive Management seeks to reinforce the importance of respecting human rights by championing the Program and ethical behavior more generally, and there is frequent internal messaging regarding the values associated with the program, including through our weekly global Business Program Review (BPR) meetings. In 2012, we also established a Corporate Social Responsibility Advisory Board to provide Barrick’s senior executives with external advice and guidance, and we tie human rights to executive compensation and our global bonus scorecard.

**Principle in Practice** In our hiring practices and vendor onboarding, we have embedded pre-screening questions for prospective workers and vendors, essentially treating human rights concerns as a basic qualification. Our security procedures related to use of force, investigations, and detention, our environmental procedures related to water and pollution, and our safety procedures related to occupational health all have been reviewed to account for potential human rights risks and impacts. One major improvement has also been strengthening of grievance mechanisms to include a category of human rights, which has led to a greater responsiveness, increased accountability and better analysis of trends that feed into strengthening our processes. We are seeking to enhance our baseline due diligence, including specifically in relation to slave and forced labor, through a new compliance technology platform that will provide improved screening approaches.

**Principle in Practice** Barrick has played an active role in the VPs, the leading multi-stakeholder initiative for security and human rights, including serving on its Steering Committee (2012-13, 2016-18), and chairing the Corporate Pillar (2013). In 2012, we volunteered to lead a working group to create a series of key performance indicators that are now followed by a number of companies, including us, in their reporting within the initiative. More recently, recognizing a lack of uniformity among companies and governments in their security support agreements, we participated in a VPs working group to create model clauses to use in support agreements between companies and governments, and have been helping lead a group to create model public and private security training. We also have served on the Board of the Global Compact Network Canada, and participated in a wide range of awareness raising activities, including most recently co-leading a working group with UNICEF to create a checklist and handbook applying the VPs to children’s rights.
THE SIX SYSTEM ELEMENTS OF THE HUMAN RIGHTS COMPLIANCE PROGRAM

Barrick’s Human Rights Compliance Program is a systematic global approach to help all our people, contractors, and business partners respect the human rights of all internal and external stakeholders impacted by our operations. We know, of course, that no program can eliminate all negative impacts that we may cause, contribute to, or be linked to through our operations. But we also believe that through a logical and embedded program, we can mitigate those risks, and provide appropriate remedies when breaches take place.

Our Human Rights Compliance Program tries to maintain consistency with the UN Guiding Principles on Business and Human Rights (UNGPs) and other international norms. It also attempts to maximize efficiencies with other company compliance programs and activities wherever possible, enabling a coherent company approach composed of a culture of compliance, clear human rights guidelines and requirements, and effective global operationalization.

To meet our objectives, there are six systematic elements that help define the program:

- Policies and Procedures
- Governance and Oversight
- Due Diligence
- Training and Advice
- Disciplinary Action and Remedy
- Monitoring and Transparency

Voluntary Memberships, Codes, Initiatives & Partnerships

Human rights challenges may stem from a variety of different sources, including gaps in regulatory frameworks, and a lack of enforcement or leadership by state actors. We believe many of those challenges may not be fully understood, hindering potential solutions, and we have tried to help bridge learnings between a range of actors. These include, in 2017, co-sponsoring with the United States Council for International Business a conference on the right to remedy in situations of limited leverage, co-sponsoring with Freedom House a roundtable on improving engagement between companies and human rights defenders, and leading and co-leading working groups involving the Government of Canada related to children’s rights and promoting the OECD Guidelines for Multinational Enterprises. In 2018, we are sponsoring with different civil society organizations a discussion series surrounding business engagement in socially responsible public policy debates.

Signatory

- UN Global Compact (2005)
- International Cyanide Management Code for the Manufacture, Transport and Use of Cyanide In the Production of Gold (2005)
- UN Global Compact Supply Chain and Sustainability Working Group (2014)
- International Code of Conduct Association for Private Security Providers (formal observers, 2015)
- Transparency International – Canada (2006)

Board/Steering Committee Member

- Global Compact Network Canada (2013)
- UN Global Compact Business for Peace Initiative (2013)
- ABA Advisory Committee on Human Rights (2015)
- Expert participant in the Centre for Excellence for Anti-Corruption (2015)
- External Stakeholder Advisory Board, United States National Contact Point (2015)
- Business Advisory Counsel, American Society for International Law (2017)
POLICIES AND PROCEDURES

Policies

Critical to any effective compliance program is a clear substantive policy and effective implementing documents. In 2011, we modified our Code of Business Conduct and Ethics to include an explicit commitment to respecting human rights. Also in 2011, we adopted a standalone Human Rights Policy, which contains the philosophical premise behind our human rights approach: that we will respect the human rights of all stakeholders impacted by our operations. It unequivocally states, “Barrick does not tolerate violations of human rights committed by its employees, its affiliates or any third parties acting on its behalf or related to any aspect of a Barrick operation.”

We regularly review and update the Policy, and solicit feedback on how it can be improved. In the course of modifying the Code and creating and revising the Policy, we have engaged with a wide range of experts, including the Keenan Ethics Institute, the Danish Institute for Human Rights, Triple R Alliance, our CSR Advisory Board and Professor Ruggie, UN Special Rapporteurs, BSR, and many others. For example, following engagement with a UN Special Rapporteur and a member of civil society, in 2017, we amended the Policy to express a zero-tolerance policy for attacks on human rights defenders.

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

The Policy applies to Barrick corporate offices and to every aspect of the mines and projects that Barrick operates, including all our people (on or off duty) and third-party contractors. It further declares that a human right is one recognized by the International Bill of Human Rights. It also mandates that we follow the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, and we maintain a separate policy specifically dedicated to implementing the Declaration.

Putting It into Practice

While creating policies is important, meeting our commitment is the bigger test. We try to meet that test by embedding human rights considerations into Barrick’s values, governance frameworks and corporate management systems. From Supply Chain and Human Resources to Security and Community Relations, Barrick considers it our responsibility to respect human rights throughout the business. Indeed, the Policy is supported by and incorporates numerous function-specific policies. These include: the Supplier Code of Ethics, the Policy with Respect to the Declaration of Fundamental Principles and Rights at Work, the Security Management System, the Community Relations Management System (CRMS), the Anti-Bribery and Anti-Corruption Policy, the Safety and Health Management System, and the Environmental Management System. The Policy is translated into local relevant language, including Spanish and Russian. We also consider it important to be transparent about our policies, and most are publicly available on our website.

Procedures

We also try to buttress our Human Rights Policy with a number of dedicated policies, standards and guidelines. Internally, we place great importance on reporting concerns and investigations.

Likewise, for external stakeholders, securing and maintaining our license to operate depends on our ability to listen actively and be responsive when they raise issues of importance to them.

Putting It into Practice

In recent years, a priority in Barrick’s CRMS has been to require that all operations have an effective grievance mechanism in place. Consistent with the UNGPs, Barrick’s CRMS provides all communities where we operate access to a simple and culturally sensitive grievance mechanism through which they can provide feedback and seek resolution to legitimate concerns.
Another key procedure relates to escalating and investigating human rights-related allegations. A global internal procedure requires immediate escalation of information related to potential negative human rights impacts. All information about potential human rights violations must be reported, regardless of whether it seems credible to the person reporting or the amount of detail that the person might know. The procedure also contains details on how information should be reported, and it includes an anti-retaliation provision. We also require that all allegations of negative human rights impacts must be investigated, though the nature and extent of the investigation may vary depending on the circumstances. Typically, for serious potential human rights breaches, we strive to create independence in our investigations. That may be through external investigators that we retain. It also may be through our corporate investigations unit, which is housed at our headquarters and is independent of the site or location where a breach may have occurred; the investigations unit is supervised by the Chief Compliance Officer (CCO) and the results are reported to a committee of the Board of Directors.

Where community members report concerns, our community relations teams provide regular feedback and updates. For serious allegations of negative impacts, we also provide information and updates for activities involving joint ventures and business partners we do not control or operate. For instance, in 2017, the Company reported in depth on security-related allegations at the Porgera Joint Venture. Where we find serious potential negative impacts, we try to keep affected individuals and communities updated directly and continuously. That has included in-person meetings, alerts through the media, and other formats.

Finally, we have created internal guidance documents to help our people in implementing our program and to try to prevent barriers to achieving the program’s goals. Examples of this include guidance on how to:

- Help detect and respond to allegations of retaliation for whistleblowers.
- Map our people for appropriate training.
- Conduct due diligence on prospective workers and institute relevant controls.
- Provide human rights remediation.
- Litigation Guidelines to help us act ethically in legal disputes, and be conscious of public policy concerns that may undermine human rights and the rule of law.
We require all allegations of negative human rights impacts to be investigated.

While our policy framework has grown substantially, we are still working to identify ways to strengthen it. In 2016, for instance, in response to growing concerns about global harassment, we introduced a new harassment standard to help provide greater workplace protections; in 2017 and 2018, with human resources taking the lead, we launched a global effort to mitigate sexual harassment and encourage a “speak up” culture against it. These efforts complemented the introduction of non-retaliation guidance for human resources and legal personnel introduced in 2016. In 2017, we also enhanced our Code of Business Conduct and Ethics to make it easier to understand and apply; we currently are engaged in a further effort to simplify the Code and relevant policies and procedures, and draw closer connections to our core values, to further enhance their understanding. In early 2018, to increase confidence in our investigations, we created a transparent set of investigative protocols to give our workers an understanding of our approach and the process, and are including survey questions for witnesses and individuals who report concerns to identify means of improving the way we investigate. As we move forward, we will continue to look for ways to improve our systems and processes, and to create greater confidence in them.
Element 2

Governance and Oversight

Day-to-day responsibility of the Human Rights Program is vested within the Chief Compliance Officer (CCO). In addition, the CCO maintains a direct reporting line to relevant committees of the Board of Directors on compliance-related issues, including human rights and investigations. The CCO also oversees our anti-corruption program and maintains authority over other international regulatory requirements at the company, helping create efficiencies with the human rights program.

We believe that vesting the program in the CCO is consistent with the UN Guiding Principles and how we view human rights. Guiding Principle 23(c) states that companies should, “Treat the risk of causing or contributing to gross human rights abuses as a legal compliance issue wherever they operate.” As we interpret it, that means we should consider human rights norms to reflect a set of international legal obligations, to be followed in the same way as with other international and local regulatory requirements.

Putting It into Practice

The Charter of the Corporate Responsibility Committee of the Board of Directors, composed of four independent Board members, specifically includes human rights, and the Committee actively oversees our human rights program. The Committee receives a quarterly update on salient human rights risks, key issues, trends and projects and an annual update discussion of the Policy and any significant changes. These may include significant allegations of human rights violations, transparency and reporting efforts, investigations, remediation efforts, human rights assessment findings and outcomes, and collective action projects. For instance, in 2017, quarterly presentations included issues related to many of our salient risks, including water quality and quantity, security related incidents at Porgera, sexual harassment, and serious injuries and fatalities.

As the program is primarily implemented on a local basis, accountability rests largely with our country leaders. Country legal heads are expected to provide local guidance, oversight and implementation of the program in their respective jurisdictions. At the same time, we undertake a risk-tiered approach, placing emphasis and resources on those locations and functions where human rights risks are most acute.

External Feedback

Implementing the Voluntary Principles on Security and Human Rights in the field is a difficult and complex task. It demands substantial changes in the management and guidance of companies, takes time and requires a determined will of senior management. Changes must be made from the design of company policies to respect human rights, to the way they conduct risk analysis, to staff training and complaint and grievance systems, to mention just a few of the human rights-related processes that must continue to be mainstreamed. But an even more difficult challenge involves the company’s relationships with other actors in its environment, particularly communities and social organizations. The Voluntary Principles make sense when these relationships are based on trust, and on mutual collaboration for the good of the communities. The Peruvian experience with the Voluntary Principles Working Group shows that an excellent tool for strengthening relations between companies and these key stakeholders is the creation of a multi-stakeholder working group. These groups allow for dialogue to exchange experiences between actors, in which they can share different perspectives but common objectives, (to defend human rights), mutual counseling, and discuss issues of common interest. The participation of civil society in these spaces is fundamental to implementation and contributing the perspectives of the communities and their leaders. NGO support is crucial to build the trust needed for collaboration.
How Do We Operationalize Human Rights?

We consider our human rights program as a form of governance. Specifically, we believe that every functional unit, office, and site plays a role in respecting human rights. Under our program, the CCO has worked with relevant internal groups and local operating units to help them consider international human rights norms in their conduct and in developing policies, procedures, and management systems. In this way, we try to operationalize human rights in ways most relevant to each area of the business, and maximize the manner in which human rights are integrated into our daily practices.

Critical to embedding human rights awareness across our operations is senior management visibly emphasizing the core principles covered by the program. This helps underscore the importance of the program, promotes acceptance, and helps create a culture where our people strive to meet and not evade the requirements of the program. Indeed, while we have a robust training program (elaborated in Core Element #4 – Training & Advice), it is not possible to provide training on every potential situation that may arise. A culture of compliance helps our people abide by the values governing the program, and interpret events consistent with it.

There are several ways that we seek to achieve leadership from the top for the program, including:

**Executive Leadership.** Our Human Rights Policy and Code of Business Conduct and Ethics were reviewed and approved by our Board of Directors, demonstrating the significance of these programs to the company. In 2017, issues related to our salient risks were discussed throughout the year, including in relation to water quality and quantity, workplace safety and fatalities, security and human rights, and sexual harassment and sexual violence. Executive management seeks to reinforce the importance of respecting human rights by championing the human rights compliance program and ethical behavior more generally through different avenues, such as executive addresses, town halls, and global emails. We include human rights specifically with our enterprise risk matrix and we tie aspects of the program to executive compensation, as reflected in our 2018 Information Circular.

**Business Plan Reviews.** We also have a Business Plan Review (BPR) meeting every week, a reporting session that includes senior leaders of corporate functional units and sites. The BPRs are overseen by Barrick’s Executive Committee. Once per month, the CCO reports at the BPR on how the human rights program is progressing against its relevant goals and on issues that might prevent the program from achieving its objectives. Each site and advanced project also must report weekly in the BPR on license-to-operate issues, which by definition include the human rights program. The BPRs enhance transparency, reminding all global leaders about key areas of the program, as well as identifying progress, challenges and concerns.

**CSR Advisory Board.** In 2012, we established a Corporate Social Responsibility Advisory Board to provide Barrick’s senior executives with external advice and guidance on emerging CSR issues and trends, as well as feedback on our performance. The Advisory Board includes highly respected figures from different disciplines: Aron Cramer, Robert Fowler, and Gare Smith, with John Ruggie serving as a special consultant. Chaired by Barrick’s President, the board convenes twice per year, and as part of its mandate it receives updates on issues related to human rights matters at Barrick.

**Executive Compensation.** We tie aspects of the program to executive compensation, as reflected in our Information Circular, and our performance on our human rights program is directly linked to the compensation for one director. We also directly tie performance under our human rights program (as well as our health and safety program) to our global bonus scorecard, which can impact our people from all functions and
How Does Barrick Address Human Rights at Joint Ventures and Entities it Does Not Control?

Like other companies in our sector, we have entered into joint ventures and other arrangements in which we may hold a significant ownership interest, but which are operated by independent entities and third parties. We try to select partners who largely share our approach, and where possible, incorporate into relevant contracts and agreements our human rights expectations. While our human rights program does not formally extend to those sites and operations, we do attempt to influence management action through contractual rights and Board membership, and are finalizing a set of internal protocols to assist us in that effort. That may be through conducting or advocating for audits and assessments, pressing for compensation structures to reflect human rights goals, seeking reports on incidents, engaging over aspects of their human rights programs, seeking regular progress updates, asking for details on trainings and stakeholder engagements, and through other efforts.

External Feedback

Human rights defenders play a critical role in promoting corporate respect for human rights by helping to identify, prevent, mitigate, and ensure accountability for corporate human rights abuses. However, defenders face significant risks to their lives and livelihoods on a daily basis as a result of their efforts to protect human rights. Businesses have a responsibility to respect the rights of human rights defenders to express their views, protest, and organize against business activities. This responsibility to respect extends to refraining from harming defenders and interfering with their legitimate activities, and remedying the adverse impacts of business operations where they arise. Businesses should also be incentivized to uphold this responsibility to respect as a matter of good business practice. Engaging with defenders helps identify possible negative human rights impacts, build relationships and community support, and design effective mitigation strategies and grievance mechanisms.
ELEMENT 3

Due Diligence

Given Barrick’s size and diverse operational contexts, no single process can provide a full picture of the company’s human rights impacts at any given location, much less around the world. We therefore take a holistic approach to understand our overall human rights footprint and the effectiveness of our human rights program and processes, and seek to feed our learnings back into the program to create an ongoing cycle of understanding, testing and improvement.

Putting It into Practice

Human Rights Impact Assessments: One of the cornerstones of our due-diligence efforts is a stand-alone, independent human rights assessment program for Barrick-operated properties. The program is discussed in detail here. The assessments are conducted by Avanzar, a respected independent third-party consultancy, and focus on actual, potential and perceived impacts. Each site is assessed on a periodic cycle of two to three years, depending on risk. The focus is on continuous improvement, not a one-time, standalone assessment to identify baseline risks, to better allow for tracking the actions taken in response to impacts identified and assessing their effectiveness. These actions are sometimes incorporated into the larger program as lessons learned. A well-regarded NGO, Fund for Peace, serves as an external independent advisor on the program, and Professor John Ruggie also provides advice and guidance on discrete issues associated with the assessments. In-depth assessments of applicable country-level risks have been provided by the Danish Institute for Human Rights.

The human rights assessment program began in 2011, and to date, all high- and medium-risk sites have been assessed multiple times. In 2017, there were Human Rights and Voluntary Principles on Security and Human Rights assessments completed at Jabal Sayid (Saudi Arabia) and Pueblo Viejo (Dominican Republic). The findings are incorporated into our overall assessment of enterprise risks under our enterprise risk management.

New Acquisitions and Mine Projects

We recognize that it is important for our program to extend in full to new operations that may be developed or acquired. In the mining industry, acquisitions and disposals of assets are common. In addition, when sites evolve from exploration to construction to operation, their character, personnel and risks change as well. We approach these areas in different ways.

Pre-Acquisition (and disposition). Under our program, we strive to conduct human rights due diligence as part of acquisitions to identify existing risks and impacts. To that end, we have created an internal guidance document, the Guidelines for Asset Acquisition and Disposition, to assist in conducting human rights due diligence for potential asset purchases (and sales).

Post-Acquisition. Following an acquisition, it is important that we rapidly apply, and that the acquired company integrate, the human rights program (and other international regulatory and compliance programs) into its systems.

Pre-Construction. Before mine projects are constructed, we strive to conduct human rights assessments and include them in the Environmental and Social Impact Assessment Reports.

As Operations Develop. As our operations develop, we continue to assess their human rights impacts, risks, and needs, and adjust the program accordingly.
system and action plans are created to address findings of potential negative impacts. Subsequent assessments evaluate the effectiveness of the actions and identify whether human rights risks have been mitigated or removed. These may be discussed during our weekly BPRs.

Our approach is distinguishable from one-time “stand-alone” assessments. It is also different from functional unit management system assessments, although (as noted below) we seek to create synergies with other assessments that relate to human rights to help to more effectively identify our human rights impacts and risks.

Internal and External Audits: In addition to our human rights assessments, we conduct a variety of internal and external audit and assurance activities that bear upon the human rights program. The results are examined over a multi-year period to identify trends and changes. We also consider the findings in conjunction with information generated by other processes, such as through our enterprise risk management process, internal audits, grievances, hotline reports, our third-party annual social assurance process, community and stakeholder engagement programs, engagements with site and functional leads, and our investigations into incidents. In 2017, all of our sites underwent internal and external audits that bear some relation to human rights considerations.

Employee Screening: Important for any compliance program is screening potential employees whose background suggests they pose risks to the substantive principles at issue. All potential Barrick people receive pre-screening questions that could result in disqualification for employment based on past human rights violations. Everyone undergoes basic due diligence through a third-party research platform before being hired, and background checks are conducted for those in positions of trust. Those in positions where human rights risks may be most prevalent, such as security, also receive heightened vetting and due diligence. In addition, job applications and/or accepted employment letters and agreements contain statements expressing our human rights expectations.

In 2017, more than 2,200 new hires were onboarded and received human rights training.

Supplier Screening and Onboarding: Negative human rights impacts can occur as a result of behavior from our suppliers and their subcontractors. Therefore, as with potential Barrick people, we educate potential suppliers on our human rights expectations to assist them in improving their human rights performance before we enter a relationship with them. Before contracting with a first-tier supplier, we require that the supplier abide by our Supplier Code of Ethics, which incorporates the 10 Principles of the UN Global Compact and key concepts of Barrick’s Human Rights Policy and Policy with Respect to the Declaration on Fundamental Principles and Rights at Work. We also include human rights considerations in our global Vendor Onboarding Standard. This includes basic due diligence on all direct suppliers related to human rights before contracting with them, and it may include enhanced due diligence on suppliers who may have elevated risks of negative human rights impacts or who provide goods or services on-site. For suppliers, a failure to fully engage in our vendor onboarding process may cause them not to be retained or to have heightened controls instituted.

Once Barrick agrees to do business with a supplier, Barrick’s Code of Business Conduct and Ethics and Human Rights Policy applies to them in their work for us, just as it does to our own people. Our contracts with third parties typically have provisions requiring suppliers to abide by key human rights norms and Barrick policies, and we sometimes provide focused training to suppliers who have particular risks of negative human rights impacts. Under our Human Rights Policy, suppliers are expected to report human rights issues of which they become aware, and we may ask suppliers to periodically provide certifications that they are not aware of any unreported human rights allegations in their work. We conducted due diligence on 99% of new mining operations suppliers in 2017 — more than 10,600 vendors. Where appropriate, we investigate allegations involving existing suppliers and engage with them in providing remediation for negative human rights impacts.
Spotlight on Children’s Rights

Integrating Children’s Rights Into the Human Rights Assessment Tool

In early 2014, Barrick worked with UNICEF on a pilot project that aimed to gain a deeper understanding of how children’s rights may be impacted by the mining sector, thus enabling UNICEF to improve its guidance on integrating children’s rights into the human rights due diligence processes of extractive companies. Barrick joined the pilot and asked Avanzar, an independent third-party consultancy, to review its existing assessment tool in light of the project goals.

Avanzar refined its tool to allow for a more in-depth evaluation of risks and impacts on children’s rights. In June 2014, Avanzar piloted a revised interview protocol at the Lagunas Norte mine site in conjunction with a matrix of child vulnerabilities that allowed it to assign severity of consequence values based on risk type.

Participation in the pilot enabled Avanzar to use the child vulnerabilities matrix to better understand and document the impact of human rights risks on children of different ages. For example, the matrix made it possible to report on the potential impacts of food security risk on children of different ages. In this case, it turned out that the younger the child, the more severe the consequence of malnutrition. The revised interview protocol also identified a number of human rights risks to children that were unrelated to mining, creating additional opportunities for positive contributions towards promoting children’s rights.

The pilot project made it clear that the mine site could improve the information it captures to enable better insight into the severity of consequences faced by children, as well as the level of positive contributions made by the mine on behalf of children. For example, social investment programs did not collect data on the number of beneficiaries, either adult or children. An impact evaluation program did analyze the number of beneficiaries after the social investment had been made, but did not specify the number of children who benefited. Given that 30 to 45 percent of the population in the area of the pilot project is under the age of 14, these unmeasured positive and negative impacts on children could be meaningful.

As a result of the pilot, the assessment now includes detailed indicators that help identify risks to children’s rights, and provide the company with guidance on how it is contributing, and may further contribute, to the positive promotion of children’s rights. Building on these efforts, in 2017 and 2018, Barrick worked with the Government of Canada and UNICEF to create a checklist and handbook applying the VPs to children’s rights.
We are continuing to look at ways to make our diligence process more efficient and effective. In 2017, we incorporated into our human rights assessments additional, more in-depth indicators related to trafficking, and to identify risks for human rights defenders. In early 2018, we also finalized an in-depth internal guidance on how identify and escalate concerns related to human rights risks for suppliers, materials we hope to integrate into a compliance technology platform to streamline our processes and allow for better diligence, record keeping and monitoring. We currently are seeking to engage in an internal project to develop greater classifications of vendors who may pose certain types of risks, to allow for more tailored diligence and controls. We also completed work with UNICEF and UNICEF Canada to develop a Child Rights and Security Checklist and handbook, to help improve the approach for us and others regarding children's rights in the security context and think about how to better protect vulnerable populations more generally.

**External Feedback**

Companies in the mining sector almost uniformly agree that children are vulnerable stakeholders within the community, and some have overt policy commitments for managing impacts on these stakeholders. However, mining companies often encounter challenges in understanding how children may be directly affected, rather than only as a result of mining impacts on adult family members or the broader community. Failing to consider children as distinctive stakeholders means that companies might not identify their specific impacts on children. This leads to critical gaps in most standard approaches to social, environmental and human rights due diligence and management systems. The UNICEF publication Child Rights and Mining Toolkit (January 2017) contains practical guidance for mining companies that want to take concrete steps in addressing their potential positive or negative child rights impacts. UNICEF calls on Barrick and all mining companies to be transparent about how they are addressing their impacts on children.
We always try to be clear to our people and contractors about our human rights expectations and requirements. We start by conveying our expectations even before a new person joins the company. The pre-screening for prospective workers not only helps us hire the best candidates, but also makes clear the primacy we place on ethical colleagues. In addition, employment letters and agreements contain statements expressing our human rights expectations, again making clear that our human rights standards are unwavering. Upon joining the company, all of our people, regardless of location or position, receive basic human rights training during their induction. More than 2,200 new hires received this training in 2017. Certain relevant personnel, including all security personnel, also receive focused in-person human rights training pertaining to their areas.

Upon joining the company, all of our people, regardless of location or position, receive basic human rights training during their induction.

Putting It into Practice

On an annual basis, every person with a computer receives refresher training on human rights. Many other people who do not have computers receive training through other means, such as DVDs. In addition, in 2014, the Office of the General Counsel created a Guidance for Employee Mapping, to help sites identify those who may be more exposed to certain human rights risks and who therefore should receive enhanced, in-person human rights training on an annual basis. Consistent with that guidance, approximately 7,350 people received human rights training in some format in 2017, including all security personnel and contractors, and all Community Relations personnel. Our “train the trainer” model empowers country-level personnel to implement our training program and deliver relevant, accessible, and effective human rights training. For certain functional areas, such as security and Community Relations, Barrick tracks the effectiveness of this training through internal assurance processes and other means.

Approximately 7,350 people received human rights training in some format in 2017, including all Security personnel and contractors, and all Community Relations personnel.

Finally, thousands of our people are required to sign annual certifications stating that they are not aware of any potential unreported violations of our Human Rights Policy, and agreeing to report any they may learn of. This also serves as a reminder of the importance of the program.
While our training program is comprehensive, we are thinking of ways to improve it. For instance, we are developing a multi-year training plan to consider how to best deliver training over time. In 2018, we chose to focus on driving company values in live small-group trainings as a way to more effectively engage our people and contractors. In 2017, we also emphasized our Harassment Standard, along with the modern slavery segment. We also are increasingly emphasizing our security training content related to children’s rights and those of other vulnerable populations.

### Focusing on Modern Slavery

In 2016, we introduced a new segment into all live and electronic training focusing on modern slavery. The segment provides common indicators of slave labor and includes advice on how to report such issues and concerns. In particular, the segment includes indicators to identify slave labor both within our operations and supply chain and in the local communities where many of our people and their families live. By empowering our workforce to identify slave labor in local communities, we hope to increase the impact of our training and further contribute to the global effort to eradicate modern slavery in all of its forms. Barrick has also published a statement consistent with the United Kingdom (UK) Modern Slavery Act 2015 to show its support for the UK’s efforts to eradicate modern slavery and human trafficking in all of its forms.
Despite our efforts, we know our policies and procedures will be breached. We think it is important to provide clear information to our people and third parties on the ramifications of breaching our Human Rights Policy, and other policies, as well as our approach to how remediation will be addressed.

**Putting It into Practice**

Our message to our people is clear: violation of our Human Rights Policy and related procedures may lead to discipline, up to and including termination. Those policies and procedures relate not only to avoiding human rights violations, but also to reporting information about known human rights violations, and cooperating with investigators reviewing human rights allegations. People have been disciplined and dismissed, and suppliers have been terminated, where individuals have committed human rights violations, have failed to report human rights violations, or have hindered investigations into potential human rights violations.

At Barrick, our message to our people is clear: **violation of our Human Rights Policy and related procedures may lead to discipline, up to and including termination.**

The potential disciplinary measures range from individual counseling, to focused training, to oral or written warnings, to financial penalties, to termination in cases of serious breaches. In assessing the appropriate disciplinary measures, numerous factors are considered, including: the significance of the procedural breach (and thus of the human rights violation), whether the individual received prior training in the area, the length of time the individual has served in the position, whether the individual was on or off duty, local law, the level of cooperation with investigators, showings of remorse and individual remediation efforts, whether the individual has committed past breaches, and whether the breach was intentional.

For third-party suppliers, discipline for committing human rights violations, failing to report violations, and hindering investigations may include termination of existing relationships, requests for focused training, and other measures. We also are unequivocal in advising our people and third parties that, where we conclude that they have committed or contributed to serious human rights violations, we will cooperate with the police in prosecution efforts, and we may assist victims in seeking redress directly against perpetrators.

**Compliance Hotline**

Barrick has internal global procedures that outline the mechanisms that our people and third parties can use to notify local and corporate management of potential human rights violations. These procedures also specify how alleged violations are to be investigated. Our people and third parties are routinely encouraged to use Barrick’s Compliance Hotline to report any potential human rights violations they might see or hear about. Details on the hotline are available on Barrick’s website and intranet, and we are continually striving to identify additional means of reporting concerns. For instance, a few years ago we added a web based method of reporting, and in 2018, we are working toward creating a compliance app that will allow such reporting. Our Code of Business Conduct and Ethics emphasizes that our people and third parties who make reports in good faith will not be retaliated against, the importance of non-retaliation is emphasized in training on the Code (given to thousands of our people each year), and we have an internal guidance document to assist supervisors and other operational leaders in monitoring and responding to potential retaliation against those who make reports.

**Grievance Mechanism & Remedy**

We recognize that our human rights compliance program will not prevent all negative impacts on rights holders, and we have policies and procedures so that every community in which we operate has simple, accessible grievance mechanisms to pro-
vide feedback and request remediation for legitimate concerns. Grievance channels vary by site, and include message boxes, telephone hotlines, town hall meetings, supervisors (for our people), and direct contact with Barrick personnel. Our annual human rights assessments include a review of how effectively the grievance mechanisms escalate potential human rights concerns. Our grievance mechanisms are also internally audited for implementation and effectiveness during regular audits of our Community Relations Management System (CRMS), and externally assessed against the UNGPs effectiveness criteria. Barrick has also commissioned independent reviews of site grievance mechanisms to test if they are meeting the needs of the company, its mines and its host communities.

In 2017, our sites received 259 grievances and resolved 244 grievances, including cases carried over from the previous year. At the end of 2017, 34 grievances remained outstanding. The types and number of grievances vary significantly between sites. At the majority of our sites, grievances are primarily related to contractor behavior, property damage, and demands for local employment, local procurement, and contracting opportunities.

When we identify negative human rights impacts that we cause, contribute to, or are directly linked to, we strive to take a culturally appropriate and thoughtful approach to remediation and communication, and we seek to avoid obstructing access to other remedies, including state-sponsored judicial and non-judicial mechanisms, in a manner consistent with the UNGPs. For instance, in the course of implementing the Porgera Remedy Framework, there was extensive debate over when and whether a company, in providing a remedy to someone under a grievance mechanism, can request that the person forgo future claims against the company for the same harms. Barrick welcomed this debate and sought the advice of a range of actors, including Professor Ruggie, the Office of the High Commissioner on Human Rights, leading human rights attorneys, and prominent human rights consultants and advisors. These experts helped shape Barrick’s approach and confirmed that it was consistent with international standards, and led us to be more explicit that we do not require individuals and communities who participate in non-judicial grievance mechanisms to waive their access to judicial recourse.

We are sensitive to the importance of collaborative stakeholder and victim input in the development of appropriate remedy. We also recognize the potential need for independence in circumstances where remediation may be appropriate. That includes voluntary participation in independent state-based non-judicial complaints, and where such complaints are raised, we form an internal working group of relevant personnel to assess how to best engage, with a presumption that we will in fact engage. For instance, we have engaged extensively with Canada’s CSR Counsellor on a range of issues, and in 2011 and 2012, we participated in an OECD National Contact Point facilitated dialogue arising from Porgera, reaching agreement with the notifiers on water monitoring and other issues. For serious negative human rights impacts, we have developed corporate guidelines regarding the internal personnel involved in assessing how remediation of negative human rights impacts will be handled, which include consideration of reporting to local authorities.

In assessing when remediation may be appropriate and the nature of the remediation to be provided, we are particularly sensitive to the importance of victim participation, stakeholder input, as well as the potential need for independence from the operational unit that may be involved in the negative impact. While remedies for negative human rights impacts will naturally differ depending on the circumstances, in-kind remediation is often preferred to cash, and sites have adopted guidelines that consider such factors, including: the degree and nature of the harm suffered, whether mine personnel were involved and on duty, whether third-party perpetrators used mine resources or committed an act related to their contracted duties, the nature of the evidence in support of the claim, the individual’s age and personal circumstances, and local laws. Examples of remedies provided include apologies, cash compensation, remediation of the underlying problem, focused training and strengthening of processes. Where negative human rights impacts are caused or contributed to by entities in our value chain or entities we do not control, we try to use leverage to have them provided with appropriate remedy and design processes to prevent recurrence.

We believe there are ways we can continue to improve our approach to disciplinary actions and remedies. One way is to help make more transparent our consideration of factors that may increase or decrease the severity of discipline, and we have created a transparent disciplinary matrix for our work-
In response to findings from our human rights assessments, we have actively sought to strengthen our processes regarding contractors. Among the steps taken in the past few years are:

- Due diligence, including human rights-related due diligence, on new and renewing vendors, and self-certification of Barrick’s Supplier Code of Ethics
- Investigations and audits of contractors where complaints are lodged (including complaints by contractor personnel), and enhancing our approach to tracking and monitoring investigations
- Enhancing our policies to extend more clearly to third parties and contractors
- Making reporting mechanisms specifically available to third parties and contractors
- Working with and, where appropriate, dismissing contractors who fail to comply with our policies or the law.

force and contractors to understand how compliance breaches will be considered, and are publishing internally metrics related to investigations and their outcomes. We can work to make the operational grievance mechanisms at all of our sites more accessible and attentive to youths and children and their representatives. We also see room for improvement in our approach to influencing the grievance mechanisms at sites we do not operate but where we own a significant interest, and are considering different strategies.
Spotlight on Conflict Minerals

In recent years there has been public concern about potential links between gold and other minerals and unlawful armed conflict, such as civil wars and militia activity. The NGO Enough! has been a leader in the fight against conflict minerals. As Enough! reports regarding the Democratic Republic of Congo:

Armed groups … earn hundreds of millions of dollars every year by trading conflict minerals. These minerals can be found in many of the products we use every day, such as cell phones and laptops. Government troops and armed groups in Congo fight to control mines and smuggling routes, murdering and raping civilians to fracture the structure of society. Locals in mining communities are often forced to take part in the illicit mining economy. Money earned from the sale of conflict minerals is used for personal profit and to further violent causes. Minerals are smuggled out of Congo through neighboring countries and then shipped to smelters around the world for refinement.

As the World Gold Council states, “[R]esponsible mining should put processes in place to make sure that neither they, nor the gold they produce, are contributing to the conflict.” In support, we participated with the World Gold Council in developing a Conflict-Free Gold Standard. The Standard is based upon internationally-recognized benchmarks and “helps companies to provide assurance that their gold is not contributing to conflict.” Barrick’s certification of compliance with the Standard is found on its website.

Putting It into Practice

Our monitoring activities take different forms. For instance, we engage in a variety of local programs related to water monitoring and environmental impacts. Our audits and assessments also help assess the status of our programs and their impacts. Local communities, our people, and third parties also perform important monitoring of our activities, and can provide feedback through active engagement, our grievance mechanisms and hotline. And of course, our Board of Directors, including our Corporate Responsibility Committee of the Board, provides important monitoring of our activities.

We also try to be transparent in the public reporting of our program and performance. Consistent with the UNGPs, we publicize our human rights commitments to local communities and other stakeholders. This includes through consultations with our Community Relations personnel, who are best positioned to provide such information in a culturally appropriate way to potentially affected stakeholders in communities near our operations. As part of the VPs, we also engage with and consult local
communities about security arrangements and our expectations around human rights. With those potentially affected, we strive to discuss candidly our systems and processes for mitigating negative human rights impacts that we may cause or contribute to. We are open in our approach when negative impacts are caused by our suppliers, contractors or other third parties. And we try to report formally when there are severe human rights impacts or risks of such impacts. We have also directly contacted and engaged with key external stakeholders about human rights incidents, progress in remediation efforts, and the relative effectiveness of our systems and processes.

Much of our global external reporting occurs on our website, which we update to reflect new information or events, through our annual Sustainability Report or through subject-specific reports, such as this Human Rights report. Additional reporting is done at conferences, roundtables and workshops. Reporting also takes place through initiatives or groups in which we participate such as the annual reports to the VPs and to the International Council on Mining and Metals (ICMM). For the latter, an external letter of assurance related to our systems and processes is submitted each year and referenced in our Sustainability Report. Other avenues of transparency may occur with our increasing number of partnerships with civil society organizations. A report by UNICEF on a pilot project regarding human rights due diligence at our Lagunas Norte mine in Peru is one example, available here. Furthermore, for the historical sexual assaults at the Porgera mine, which Barrick previously operated, we supported the publication of an expert independent assessment of the formal remedy program that was instituted. That report is available here. Other recent examples include:

- Distributing booklets regarding human rights to local community members and government entities;
- Conducting community surveys on the prevalence of violence to gain feedback on how to improve security arrangements;
- Engaging public officials and community authorities on how to promote respect for law and order, reduce conflict, and enhance and strengthen justice service delivery; and
- Providing education on the impacts of land purchase and sales.

Looking forward, among the six key elements of the human rights compliance program, we believe our monitoring and transparency is perhaps the area where the most work can be done. We are considering, such as through this Human Rights Report, ways to improve our reporting on the elements of our program, where it can be improved and how it can grow. We also know we can be more effective in how we quantify the effectiveness and impacts of our programs, and are engaging with other leading companies and thinkers, and assessing other substantive areas, to identify means of doing so. To increase visibility into our operations in real time, we have established cameras available to the public at some of our sites; through technology and digitization, we are identifying other ways to increase that level of transparency.
As an extractive company with global operations, we know there are many ways our activities may directly or indirectly, and positively or negatively, impact human rights. Our human rights program, and our engagement with internal and external experts and stakeholders, provides many of the important inputs and processes to help us identify these potential impacts. In identifying our salient risks, we undertook three sets of activities:

- Analyzing the past results of our internal processes. These include results from third-party human rights assessments, internal and external audits and assessments, hotline reports and investigations, grievances and our enterprise risk management process, which includes root cause analysis.

- Analyzing sectoral risks and the risks in the countries and communities where we operate. Our participation in multi-stakeholder initiatives like the Voluntary Principles, in cross-sector working groups like BSR’s Human Rights Working Group, and in industry associations like the Mining Association of Canada and the International Council on Mining and Metals (ICMM) are important sources of information. These and other forums help broaden our understanding of where the risk of adverse human rights impacts is most significant for mining companies.

- Formal and informal consultation with senior management, external experts and civil society organizations, our CSR Advisory Board and ongoing engagement with internal and external stakeholders, at our mine sites, in our host countries and communities, at the corporate level, and through workshops and meetings as well as one-on-one conversations. In addition, in 2017 and 2018 we have done extensive internal and external stakeholder surveys which have informed our salient risks.

As a result of that analysis, we continue to feed new data points and have reaffirmed six key areas that may pose risks to rights-holders, without specific reference to geographies: Security, Water Management, Safety and Health, Non-discrimination, Working Conditions, Resettlement. We continuously evaluate this list in light of issues we see in our operations, changes in the industry, and feedback from stakeholders. While other issues, such as those related to indigenous peoples, are important to us and within the extractive industry as a whole, they are not considered salient human risks for us – whether because of the nature of our assets, the geographies where we operate, or otherwise. That could change, of course, and hence it is important to continue to reflect on the nature of our risks and impacts.
Companies operating in complex environments around the world routinely experience significant challenges while trying to balance the protection of corporate assets and the human rights of its workers and local communities. The VPs were created with these challenges in mind, and are the most widely adopted and respected set of security and human rights standards in the world. Over the past few years, we realized that many companies still struggle with understanding how to assess the extent to which they are implementing the Voluntary Principles on Security and Human Rights. After engaging with governments, civil society organizations, and other companies, we came to the conclusion that further guidance would be helpful in this respect. In 2015, Barrick chaired a working group in the Global Compact Network Canada to create a Guidance Document on the Assurance of the Voluntary Principles on Security and Human Rights. The Guidance Document, which includes a foreword by Professor John G. Ruggie, former UN Special Representative for Business & Human Rights, aims to facilitate companies in implementing the VPs, and thereby identify areas of improvement and reduce negative human rights impacts.
Salient Risk 1

Security
The Right to Life, Liberty and Security of Person

Why This Is a Risk

Barrick explores and operates in diverse locations around the world where security contexts vary greatly. We also produce a precious commodity – gold – and our mine sites house valuable equipment, vehicles, commodities and materials that must also be safeguarded. In light of this, we recognize the need for an effective security program to protect people, products, assets and reputation.

Often that means having to rely on public and private security. As a result, we may have no choice but to enter into relationships with security forces that have questionable human rights records, over which we have no control. The need to enter into these security relationships may arise because of violence in local communities, threats to the site and our people, or because the government insists on public security to protect an important national resource.

Human rights–related issues in the mining sector that have involved public security personnel include:

- Discouraging union activity
- Enforcing or extracting forced labor
- Enforcing workforce discipline
- Clearing or resettling people from their land
- Using excessive force to make arrests or reduce security risks
- Responding with violence to peaceful protests
- Intimidating local communities, NGOs and activists
- Engaging in extortionate behavior, including taking money or equipment and sexual assaults

In addition, in developing countries, it is becoming increasingly common for governments to assign military personnel to perform policing activities, which has occurred at Porgera and elsewhere. Some of the challenges for companies can arise based on the distinct training regimens for military and police personnel, and access to appropriate equipment for policing activities.

In all locations, we contract with and employ private security personnel. While private security personnel at our sites generally do not carry hard munitions, they nonetheless can be implicated in serious human rights abuses. Many have prior experience in local police or military forces in which respect for human rights may be wanting or uneven, or are from local communities where violence is prevalent. Fully reliable vetting can be a challenge, and despite company training, messaging and monitoring, improper practices related to the use of force, detention or investigations may occur. Indeed, local private security providers perpetrated the gender-based violence at

Key Facts

According to the UN, in Rwanda, between 100,000 and 250,000 women were raped during the three months of genocide in 1994, more than 60,000 women were raped during the civil war in Sierra Leone (1991-2002), more than 40,000 in Liberia (1989-2003), up to 60,000 in the former Yugoslavia (1992-1995), and at least 200,000 in the Democratic Republic of the Congo since 1998, mostly at the hands of security forces and others associated with the conflicts.
Porgera, demonstrating vividly and terribly how substantial the risks of negative impacts can be and how attentive we and other companies must be to those risks.

Because of these issues and others, multiple studies have confirmed that companies in the extractive sector, including Barrick, often face salient risks arising from their reliance on public or private security forces.

**Our Approach to Managing this Risk**

Barrick has developed a Security Policy and Security Management System designed to respect human rights while protecting persons and property associated with our mines. We categorize our operations according to the security risk and, based on the security threat and the location of the operation, we determine which procedures and what type of protective equipment and infrastructure are required. Recognizing the risks that security-related matters pose to human rights and other areas of sustainability, security is subject to partial oversight from Barrick’s legal governance and compliance function. All security personnel receive human rights training on an annual basis. All of Barrick’s training requirements apply to third-party organizations providing security personnel.

The Voluntary Principles on Business and Human Rights (VPs) guide and dictate our overall approach to providing security on a global basis and are integrated into our Security Policy and operationalized by our Security Management System.

**Spotlight on The Voluntary Principles on Security and Human Rights**

**Summary of Core Elements**

**Risk Assessment:** This should cover security risks, potential for violence, human rights records, rule of law, conflict analysis and equipment transfers.

**Security Arrangements:** Companies should consult with host governments and local communities about the impact of their security arrangements on those communities. They should also encourage security to be provided in a manner consistent with its policies and encourage transparency (subject to security concerns).

**Deployment and Conduct:** Companies should use their influence to try to make sure that:

- Individuals credibly implicated in human rights abuses do not provide security.
- Only necessary and proportional force is used.
- The rights of individuals should not be violated while exercising the right to exercise freedom of association and peaceful assembly, the right to engage in collective bargaining, or other related rights.

**Use of Force:** Where physical force is used by public security personnel, it should be reported to the appropriate authorities and the company. Medical aid should be provided to injured persons, including to offenders.

**Consultation and Advice:** Companies should hold regular and structured meetings with public security providers to discuss security, human rights and related workplace safety issues. They should also consult other companies, their host and home governments, and civil society. Companies – whether individually or collectively – should promote observance of applicable international law enforcement principles when consulting with host governments, as well as human rights training for public security personnel.

**Responses to Human Rights Abuses:** Companies should report all credible allegations of human rights abuses by public security personnel in their areas of operation to the host government. If appropriate, the company should encourage investigation of these claims. Companies should also monitor the use of any equipment it has provided to public security forces and investigate incidents of misuse.
This includes our engagement with public security providers (e.g., host nation military and police representatives) who may provide external security and response assistance, as well as private security providers. The VPs also help us formulate guidelines and train security personnel on the use of force and respect for human rights. We have Memorandums of Understanding with security agencies in Zambia, Peru, and the Dominican Republic, reflecting the terms of the VPs. The Porgera Joint Venture also has a Memorandum of Understanding with local police forces in Papua New Guinea. Barrick has created a template reflecting our security and human rights expectations for joint ventures and affiliates in which we have an interest but do not control, and seek to use our leverage to help implement those expectations.

Over the past several years, there are many ways we have sought to abide by the VPs, including:

- Focusing on the use of less-than-lethal munitions as part of our security approach;
- Helping to arrange for an independent observer of public security operations;
- Conducting background checks on security personnel or contractors, including developing a pre-employment procedure whereby we can use expanded searches and different forms of identity documentation if needed;
- Facilitating human rights training for public security at several locations, including in partnership with the International Committee of the Red Cross;
- Providing substantive input into public security training materials;
- Encouraging local stakeholder consultations related to public security arrangements with a range of governments;
- Participating in local working groups to discuss practices as to implementation;
- Reporting human rights incidents related to public security to appropriate authorities, sharing related internal information, and urging investigations; and
- Participating in and leading working groups with a range of stakeholders to develop tools and identify best practices to assist in implementation.

We assess our compliance with the VPs regularly through multiple internal and external review channels, develop action plans for follow-up, and consider the outcomes of the reviews in developing and strengthening our programs. For example, we conduct audits of both our compliance with the VPs (both internal audits and third-party audits) and our compliance with all related policies and procedures, such as the Security Code of Conduct, Use of Force procedure, pre-employment screening and related requirements.

Although these steps help mitigate the risks posed by public and private security, we recognize that substantial challenges remain. We will continue to consider approaches to vetting and training private security providers, including through collective action; the International Code of Conduct for Private Security Contractors Association (ICOCA) and activities within the VPs are both potential avenues. We also will consider ways, through the VPs, home governments and other approaches, to help enhance the human rights training for public security, and avoid having public security officers with credible human rights violation accusations assigned to provide security around our sites. We will continue to work with leading civil society organizations, companies, and governments to identify best practices and practical solutions to the continued risks that security forces pose. In 2017, Barrick’s Security team also conducted external benchmarking and research into step-change opportunities for the Company’s security performance, particularly in terms of security structures and operating models. In 2018, compliance personnel are engaging with the security team in different locales to identify further areas of improvement.
Our Performance and Progress

• In 2017, over 800 Barrick security personnel & approximately 790 Security contractor personnel (100% of security personnel) received dedicated, in-person human rights training, including use-of-force training. This comprised more than 17,500 hours of total training.

• In 2017, we regret that we experienced a security-related incident at the Lumwana mine in Zambia. Incidents also occurred at the independently-operated Porgera Joint Venture in Papua New Guinea.

• At Lumwana there was an incident in which site security personnel improperly treated suspects arrested in the township. Following an investigation site security personnel were terminated.

• At the Porgera Joint Venture, there were two security-related allegations in 2017. In March, national police cleared residential structures near the site fence line. This activity resulted in allegations of police misconduct and human rights abuses from community organizations. These were very serious allegations and which the police, the Independent Monitor, and the PJV investigated thoroughly. These allegations were clearly shown to be false, both as to PJV complicity in the activity and as to the substantive human rights allegations. Further information on these allegations and the investigation can be found here. Also, in March, a local group alleged that the police committed a sexual assault near the mine. This allegation was investigated and, as of yet, has not been confirmed. No individuals have come forward for medical or humanitarian assistance.

• In July 2016, we organized, with UNICEF Canada and the Government of Canada, a multi-sector working group to create a checklist and handbook related to the VPs and children’s rights. The checklist was launched in March 2017 and we subsequently revised Barrick’s Corporate VP Standard to align with this new best practice guideline. Barrick also leads the Voluntary Principles Initiative (VPI) Training Project Working Group. We are working to develop a model security and human rights training package that will be available to all VPI members and perhaps more broadly.

• In 2017, we conducted audits of security-related standards across three Barrick-operated sites (Pueblo Viejo, Cortez, Lumwana) and two sites not operated by Barrick (Jabal Sayid and Veladero) and worked to implement recommendations and follow-up activities. These audits identified improved engagement between security personnel and the community at Pueblo Viejo, as well as increased conformance with the Voluntary Principles at Pueblo Viejo and Jabal Sayid.

• Since 2011, we have also engaged Bureau Veritas to conduct annual external ICMM assurance audits on the VPs at some sites, resulting in a public Assurance Letter. As part of that process, Bureau Veritas completed a VP assessment at Pueblo Viejo in the Dominican Republic in early 2018.
Salient Risk 2
Water Use & Management
The Right to Water

Why This Is a Risk
Water is a shared, vital, and often scarce resource. As mining is a water-intensive industry, our activities, if not properly managed, have the potential to negatively impact the quality and availability of water for other users. This is not only the responsible and ethical thing to do, but it also makes good business sense. If we do not live up to our commitment to manage water responsibly, we know that it weakens our partnerships with governments and communities. That is why we must maintain strong water-management capabilities and risk-management practices everywhere we operate.

Our Approach to Managing the Risk
At Barrick, we strive to use only what we need and to reduce our impact on other water users in the countries and communities with whom we partner. Our water use, through all stages of the mining life cycle, is guided by Barrick’s Water Management Framework. The Framework is designed to facilitate site-based water stewardship that brings value to the Company while protecting our people, our partners, and the environment. It is aligned with the ICMM Position Statement on Water Stewardship and is based on three pillars:

- **Assess:** We first assess our water-related risks and water conservation opportunities through rigorous analysis. Water stewardship will be integrated into life-of-mine planning in a systematic way, factoring in considerations like the long-term water balance and cumulative impacts. We try to proactively identify water risks across the mine lifecycle and we put in place the right talent, the right plans and the right resources to effectively manage and mitigate these risks at all of our sites.

- **Assure:** We responsibly manage water resources by updating our standards, guidelines, assurance reviews and audits to mitigate our risks and continuously improve our performance. Though every site has distinct characteristics and circumstances, these procedures provide consistency to our assessment and assurance processes. At its core,

Spotlight on The Water Project

- Half of the world's hospital beds are filled with people suffering from a water-related disease.
- In developing countries, about 80% of illnesses are linked to poor water and sanitation conditions.
- One out of every five deaths under the age of five worldwide is due to a water-related disease.
this follows a simple structure and each site must address a number of key considerations: what are your risks, what is your mitigation plan, what are your resources, how much will it cost to implement your plan, when will it be implemented, and what are the key milestones?

- **Collaboration:** We engage continuously across our business to provide to all water-accountable people at Barrick the tools to share information, collaborate, innovate and build institutional knowledge. We will also engage continuously with other water users in our host countries and communities, and beyond, seeking their input and feedback on our plans and sharing information about how we use and manage water.

As part of Barrick’s digital transformation, the Company is working to implement technology to automate water monitoring and decision making, increase the efficiency and effectiveness of our systems and improve transparency with our stakeholders. For example, since mid-2017, Barrick has been integrating digital weather forecasts into our site water models at our South American sites to help predict weather-related water risks in real time.

**Water Quality**

In order to safeguard and protect basin water resources, we must understand and report our water performance. All of our mines have established water-monitoring networks to monitor the quantity and quality of the basin water resources.

At some of our operations, water used for processing or encountered in mining is thoroughly treated and put back into the environment. This is done according to strict standards, and we continuously monitor the quality and quantity of any discharged water. Permit limits or legal standards govern the concentrations of certain constituents that can be discharged in the water. We also monitor the performance of our site water management systems, detect and act on any deviations, and pursue improvement opportunities.

At some of our operations, water used for processing or encountered in mining is thoroughly treated and put back into the environment. In 2017, Barrick discharged 60 Mm3 of water back to the environment once it met water quality permit limits.

If water quality parameters were to exceed permissible limits, we would report it to the relevant government agencies as required by our permit or relevant regulations. Our management leadership teams and environmental specialists share monitoring data routinely with the appropriate local authorities at all our operations. We also invite and welcome local authorities and stakeholders to regularly inspect our mine and water-management facilities.

**Water Conservation**

Barrick operates in a number of arid and semi-arid regions where we preferentially use lower quality brackish or saline water to meet our water needs. Using saline water also reduces costs and maximizes the availability of fresh water for other community users.

We utilize the “fit for use” principle to conserve fresh water by prioritizing the use of water with poor quality wherever possible instead of fresh water, and by recycling and reusing as much water as we can. An example of this is when a water outflow from one activity is used for another – such as wash-bay water being used for dust suppression following necessary treatment – or when gold-laden processing water is stripped of the gold and the water is then re-circulated back through the processing system. Barrick has made significant advances in metallurgical technologies for the gold and copper concentration process to reduce freshwater demand and reduce costs associated with water. We understand that fresh water is a valuable resource and only consume it when necessary for demands such as reagent mixing and domestic water supply. The majority of our water demand is met by brackish or recycled sources.

Barrick also engages and collaborates with other water users, such as agricultural producers, to pursue sustainable management of water resources. In communities that lack clean water, we have programs in place to help maintain fresh water supplies.

**Transparency**

Transparency is the currency of trust, and integral to how we manage water. Our environmental specialists share monitoring data with appropriate regulators, and the mine’s water treatment facilities are inspected regularly by local authorities. We have also developed an internal, online water community
Our Performance and Progress

- Approximately 77% of the water Barrick used was recycled in 2017 – approximately 119.4 Mm³.
- In 2017, we regret to report that we had several environmental incidents related to water (described here), including an incident at Veladero in which a pipe carrying gold-bearing solution on the leach pad ruptured. In response, we redesigned and upgraded the key process solution distribution system.
- In 2017, Barrick introduced public, online live water monitoring at the Pascua-Lama project as part of our efforts to strengthen community trust at the site.

- Barrick also actively engages with local communities at six of our sites on water-related matters through community participatory water-monitoring programs and other forms of communication. In participatory monitoring, Barrick’s environment and community relations teams partner with local community members to collaboratively monitor water quality. By gathering data and viewing results side by side, these programs increase transparency in our processes, underscore our confidence in the measures and systems in place to maintain water quality, and, ultimately, help build trust with our partners who share this essential resource with us.
Salient Risk 3
Safety & Health
The Right to a Safe Working Environment

Why This Is a Risk
Exposure to mining equipment, harsh weather conditions, loud noises, potential rock falls, hazardous chemicals, confined spaces, slips, trips, and operator error can all contribute to workplace injuries. We are committed to achieving a zero-incident work environment with a safety culture based on teamwork and leadership. Every incident is preventable, and everyone has the right to a safe working environment.

We believe that the prevention of all incidents is a realistic goal and not just a theoretical objective. With any less demanding objective, injuries and illnesses become acceptable. Belief in this principle provides a commitment to determine and eliminate the root cause so that future occurrences can be prevented. Nothing is more important than the safety, health and well-being of our workers and their families.

Our Approach to Managing this Risk
Barrick’s Safety & Health Policy and Safety & Health Management System are the primary tools that guide our efforts to achieve zero incidents. They require safety and occupational health evaluation, as well as planning and design to be integrated into our business development strategies. All our people are responsible for safety in our mines, exploration, closure sites and in the communities where we operate. Management establishes safety goals, requires accountability for performance, and provides the necessary resources. Safe production is always our goal, and these tools help sites stay committed to continuous improvement in safety performance.

We have implemented important safety and health programs and activities, special training for emergency response teams, performance measurement, risk-assessment processes, recognition programs for safety achievement and a steady flow of information to keep people focused on continuous safety improvement. Safety training programs are conducted for our people and contractors at all Barrick operations and projects, as well as at our office locations.

Regular corporate assurance reviews at our operations help identify safety and occupational health hazards and confirm that effective controls are in place and monitored for continued improvement and effectiveness. When safety and health assurance reviews identify deficiencies, we pinpoint the root causes so that preventive actions can be implemented.

Life Saving Controls
Over the past decade, we have seen a substantial improvement in our total reportable injury frequency rate (TRIFR) and other safety statistics. Nevertheless, we continue to experience fatalities at Barrick mine sites. We are increasing our efforts so that we eliminate fatalities and achieve our safety vision of every person going home safe and healthy every day.

We have identified 15 fatal risk categories that continue to be our focus for improvement going forward. The top five risk categories include: Operation of Mobile Equipment (Heavy), Operation of Mobile Equipment (Light Vehicle), Stored Energy,

Key Facts
The ILO has estimated that, every single day, 6,400 people die from an occupational accident or disease, amounting to 2.3 million deaths each year.

3 Fatal Risks are risks that could, in specific circumstances, result in fatalities.
Fires (fixed and mobile) and Use of Cranes and Lifting Devices. The internal assurance review process and trending analysis help to identify emerging risks, as well as to show where progress is being made towards improving controls and reducing fatal risk-related incidents.

Building on this analysis, we have developed a Fatal Risk Management Plan based on the ICMM critical control management guidance. This is a fundamental change in thinking whereby sites are required to have processes in place to effectively monitor the identified controls that work to prevent the identified fatal incidents.

**Safety Committees**

Barrick believes that everyone is responsible for workplace safety. Therefore, we have safety committees at all sites and hold regular safety meetings to help address the needs of each site. Many of our operations conduct daily safety meetings, while others conduct weekly meetings.

Joint representation of managers, supervisors and workers on our safety committees helps us hold each other accountable for superior safety and health practices and provides the leadership and resources needed to achieve our vision. Safety interactions, using tools such as Visible Felt Leadership and task observation programs, are also conducted by functional areas within each operation to involve all workers in eliminating unsafe conditions in the work environment.

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**Our Performance and Progress**

- We deeply regret to report two fatalities at Barrick in 2017.
  - In February, we lost William Francisco Garrido Miranda, a Contractor at our Pascua-Lama site in Chile, when he suffered fatal injuries after an unsecured load fell on him. Barrick has continued to emphasize and improve its Courage to Care program – a training program that reinforces a culture of safety among our people. Through this program, we can affirm the message that nothing is more important than the safety, health and well-being of our people and their families.
  - In November, we had a second fatality when Eulogio (Bot) Gutierrez, a surveying technician at our Hemlo mine in Canada, was fatally injured after being struck by a piece of mobile equipment while working in the underground mine.

In response, Barrick is working hard to reinforce its Fatal Risk Management and Lifesaving Controls Programs. These programs require sites to establish and improve controls in areas related to safety and health, such as proximity detection and collision avoidance, resulting in fewer injuries and fatalities.

- We achieved the lowest safety incident record in our history in 2017 with a total reportable injury frequency rate of 0.35.
- In 2017, each site was required to implement Life Saving Controls for their top five fatal risks. All Barrick-operated sites achieved this target. In 2018, each site will create Critical Control Management Plans for each of the remaining applicable controls.
- All Barrick sites have occupational health and safety committees representing 100% of Barrick people.
Salient Risk 4
Non-Discrimination in the Workplace
The Right to Equality and Non-Discrimination

Why This Is a Risk
Numerous studies—including our own internal reporting, assessments, and investigations—have confirmed that gender equality, sexual harassment, and gender-based violence are very real risks in the mining industry. Mining continues to be a male-dominated industry.

We also operate in environments where treatment of women may not always reflect international norms, including the right to equality and non-discrimination. Indeed, Barrick’s own past experience regarding sexual violence when we operated the Porgera mine reflects that unfortunate reality.

Barrick is committed to providing equal opportunity and freedom from discrimination for all our people. We also extend these commitments to our third parties through our corporate policies.

Our Approach to Managing the Risk
Barrick’s Code of Business Conduct and Ethics, our Human Rights Policy, and our Policy with Respect to the Declaration of Fundamental Principles and Rights at Work set the tone for the maintenance of a safe and ethical workplace at all Barrick operations and offices. We require that our work environment be free from discrimination and harassment. We also extend these commitments to our third parties through our corporate policies.

Employment Practices
Barrick is committed to fair employment practices and a workplace in which all individuals are treated with dignity and respect. We do not tolerate discrimination. Our Code of Business Conduct and Ethics and Human Rights Policy both cover harassment and discrimination, and require Barrick to deal fairly with our people and third parties. We believe that every individual within the Company must be accorded equal treatment, and we are each responsible for a workplace that is free from all forms of discrimination, harassment, and retaliation.

The Company expects that all relationships among our people in the workplace will be professional and free of bias and harassment. We are committed to promoting equal opportunity in the workplace and treating all people – both our personnel and potential personnel – based on their merit. The fundamental criteria for career advancement are work performance, qualifications, competence, abilities, skills, knowledge, and experience relevant to the job.

We consider men and women equally in our search for new personnel, and people of either gender are encouraged to apply for employment in all job categories. Men and women employed in the same job category receive the same remuneration, according to their level of experience and length of

Key Facts
According to the Institute for Women’s Policy & Research, in 2015, on a worldwide basis, female full-time workers made only 79 cents for every dollar earned by men, a gender wage gap of 21 percent. Women, on average, earn less than men in virtually every single occupation for which there is sufficient earnings data for both men and women to calculate an earnings ratio.
employment. However, there may be a gender bias that is predominant in different labor categories. For example, outdoor manual labor may have a higher hourly pay than inside office workers, and there may be a bias of males in the first category and females in the second. Where this occurs, there may be a perceived gender bias in salary. This may actually reflect a gender bias in the choice of work categories rather than in the rates of pay.

Anyone who is found, after appropriate investigation, to have engaged in unlawful discrimination, victimization, or harassment of another person at Barrick will be subject to appropriate disciplinary action, which, depending on the circumstances, may include dismissal. In all cases, the action will be designed to avoid repetition of the conduct.

To underscore our steadfast position against sexual harassment in the workplace, we have a global anti-harassment standard. We also have dedicated programs to address sexual harassment, which include training, reporting, monitoring, and other steps to reduce the likelihood of harassment and assist victims when it occurs.

We recognize that we still have much work to do on our sites and in our offices, and we are considering additional programs in local communities focused on gender rights and gender-based violence. We acknowledge that we have a responsibility to help prevent and mitigate human rights violations in our local communities, as on our properties, and we are actively considering additional programs and initiatives to help meet that responsibility.

Our Performance and Progress

- In 2017, approximately 12% of Barrick’s workforce was female, including approximately 15% of management, 13% of executives and 13% of the Board of Directors.
- In 2017, the ratio of male to female salaries at Barrick was 0.93.
- In 2017, approximately 5,800 people were trained on harassment, including sexual harassment.
- In 2016, Barrick joined the 30% Club Canada. The 30% Club aims to develop a diverse pool of talent for all businesses through the efforts of its Chair and CEO members who are committed to better gender balance at all levels of their organizations.
External Feedback

Pursuing gender equality is a challenge to which we must all recommit ourselves. As Barrick knows, we remain painfully far from removing the obstacles faced by women and girls seeking to enjoy the same opportunities and privileges as their male counterparts. According to the World Economic Forum, the gender gap is particularly wide in respect of economic and political participation, and the gender pay gap could take 170 years to close.

Primarily, this gauntlet should be picked up by governments – after all, it is states that bear the obligation to protect the rights of their citizens. However, legislative and executive action to eliminate gender discrimination has been too little, too patchy and too slow. This may partly be because less than 23% of all national parliamentarians and less than 20% of government ministers are women. States must improve, but the need for meaningful change is more urgent than to wait for state action.

Today’s most successful companies understand that they need to attract the best talent and to do that they need to embrace diversity. Leading companies are now championing the cause of gender equality, partly out of a sense of moral duty but also because it makes good business sense.

Despite this technological age, business is still very much about people. The people companies rely upon – including investors, consumers, employees, and government and commercial partners – want to deal with companies of integrity whose activities are guided by clearly understood values. Taking a holistic approach to gender rights is now a commercial imperative with a direct link to financial performance and sustainability.

But what does this mean in practice?
The starting point for any organization must be to carefully consider how it affects the rights of women, both internally and externally. Only then can these impacts be addressed strategically and systematically. Crucially, this requires commitment and engagement from the top, and a sustained approach embedded company-wide – not simply a few feel-good stories from isolated parts of the business.

Each company’s experiences and impacts will differ, but there are some key themes to consider.

Internally, is the organization adequately recruiting, training, utilizing, recognizing, compensating and promoting women? Does it offer fair options for working flexibly, which we know is valued by all parents but particularly by women? Are managers trained to understand the unconscious biases that pervade businesses, and are they empowered to take effective steps to remove everyday sexism to get the most out of their teams? Are women properly represented at all levels of the business, throughout the management hierarchy and on the board? Probably not – today we see ‘glass pyramids’ everywhere, with women over-represented at the bottom of the pay scale and scarcely present towards the top.

Even more difficult for many companies is to understand how they affect the rights of women outside their organization, whether directly or indirectly. Avoiding harmful impacts and delivering real benefits is not easy. For some businesses, the women affected will be separated from the company’s decision-makers by distance, language, culture and other factors. Even well-meaning social programs can have negative unintended consequences because of the complexities of the modern world.

The best companies are working hard to engage with women proactively, meaningfully and effectively. Businesses can be the most creative, collaborative, and resourceful organizations we have, and when directed towards gender equality the positive difference they can make is huge. This approach also promises long-term commercial benefits for those same companies. These days, Barrick and other businesses simply cannot afford to be left behind when it comes to gender equality.

Cherie Blair CBE, QC
Chair of Omnia Strategy LLP
Salient Risk 5
Working Conditions
The Right to Just and Favorable Conditions of Work

Why This Is a Risk
Mining is a sector in which people may not always have the right to just and favorable conditions of work. Our industry operates in environments where the use of forced and child labor, particularly in local communities and in supply chains, persists. In these locations, freedom of association, and the right to participate in labor associations, also may be strained.

Barrick is committed to upholding the elimination of all forms of forced and compulsory labor, and to supporting the effective abolition of child labor. Barrick also supports the rights of workers to join a union or other labor association. We extend these commitments to our third parties.

Our Approach to Managing the Risk
We support freedom of association, have zero tolerance for forced labor or child labor, and enforce a minimum-age requirement for our people. Barrick’s Code of Business Conduct and Ethics (“the Code”), our Human Rights Policy, and our Policy with Respect to the Declaration of Fundamental Principles and Rights at Work set the tone for the maintenance of a safe and ethical workplace at all Barrick operations and offices.

Child Labor
Child labor is the employment of children that is economically exploitive, likely to be hazardous or to interfere with the child’s education, or likely to be harmful to the child’s health or physical, mental, spiritual, moral, or social development. The legal age at which young people may work varies from jurisdiction to jurisdiction. Barrick does not knowingly employ a person who is under the legal age of employment or where that employment would contravene the International Labor Organization’s convention for age of employment. Barrick’s minimum age for employment is 18; therefore, our hiring practices preclude child labor at our sites in all countries where we operate.

Barrick’s most significant contributions to the effective abolition of child labor are our global investments in education, such as our partnerships with One Laptop per Child, the Public Education Foundation in Nevada, and our community infrastructure development projects that support schools, community centers and recreational areas. We include information on child labor in our human rights training, providing information to people on how to identify and report concerns regarding child labor. We have also introduced a child rights and security checklist, which address the hiring of children in the security context, among other issues.

Forced Labor and Modern Slavery
Forced and compulsory labor is any work or service, not voluntarily performed, that is extracted from an individual under threat of force or penalty. This includes bonded or indentured labor, slavery or similar coerced labor arrangements. Barrick does not engage in any type of forced or compulsory labor at any of our operations or offices.

Since 2016, we have included in our global human rights training a module on how our people can identify and report concerns regarding modern slavery and trafficking, whether internally or

Key Facts
According to the International Labor Organization (ILO), there are 168 million children in child labor; more than half, 85 million, are in hazardous work. The ILO has identified mining generally, and gold mining specifically, as an area of risk. The ILO also reports that 21 million people are in forced labor.
in our communities. In 2017, Barrick’s human rights assessments were updated to include an enhanced assessment of trafficking. We have also published a statement consistent with the United Kingdom (UK) Modern Slavery Act 2015 to show our support for the UK’s efforts to eradicate modern slavery and human trafficking in all of its forms.

We readily acknowledge there are more steps we can take. These include thinking about additional approaches to identify modern slavery in our supply chain, and further educating our workforce on how to spot evidence of modern slavery in local communities. We also will continue to work with civil society and other experts to identify new approaches to address this global problem.

**Freedom of Association**
Barrick respects the rights of our people to freedom of association and collective bargaining. This includes the right of each individual person to join a union or other labor association.

We have a number of facilities around the world with unions or bargaining associations. Approximately 26% of our people are represented by unions or collective bargaining associations in three countries. In addition, personnel are represented by unions at the Veladero and Porgera mines (which are not operated by Barrick).

Due to our practice of communicating regularly with these associations, we have not had many significant labor relations issues involving our unions. Indeed, we strive to work closely with labor unions or collective bargaining associations to develop and manage effective labor relations programs. Depending on the requirements of the labor union or association, sites with union membership often have safety topics included in labor agreements. We consider activities and actions conducted by site safety and health committees to be essential to embedding a culture of safety within the Company.

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**Our Performance and Progress**

- In 2017, approximately 3,650 people received e-training that included specific material regarding child labor and modern slavery and trafficking, including how to identify them on-site and in local communities, and where to report concerns where suspicions of child labor and modern slavery and trafficking may exist.
- Barrick has not identified evidence of slave or forced labor, child labor or human trafficking on any Barrick-operated site.
- We engaged in more than 20 consultations with unions regarding organizational changes in Barrick in 2017.
- In 2017, we did not experience any work stoppages related to labor disputes longer than one week’s duration at any of our sites.
- Approximately 26% of our people are represented by unions or collective bargaining associations in three countries. In addition, personnel are represented by unions at the independently-operated Veladero and Porgera mines.
- We conducted due diligence on 99% of new mining operations suppliers in 2017 — more than 10,600 vendors.
Salient Risk 6
Resettlement & Human Rights
The Right to Property

Why This Is a Risk
At times, the construction or expansion of a mine may require land acquisition and, in some cases, resettlement of local communities. This can entail the physical displacement of people and a disruption of their livelihoods and represents a salient risk for Barrick. Poorly planned and managed land acquisition, including physical resettlement and economic displacement, can adversely impact communities and our relationships with them. Many companies, including ours, have been criticized for resettlement activities in the past.

Our Approach to Managing the Risk
Barrick seeks to avoid resettlement whenever possible by exploring alternative project designs.

When resettlement cannot be avoided, Barrick’s Community Relations teams work together with affected households, communities, and host governments to manage resettlement in a manner consistent with local laws and international best practice. We know that effectively, responsibly, and respectfully managing the impacts and risks where displacement is unavoidable will help to limit negative outcomes, help us respect human rights, and support our license to operate.

Our Performance and Progress
We did not undertake any resettlement activities at Barrick-operated mine sites in 2017.

Key Facts
Since 2000, more than 60 million hectares have been subjected to land grabbing, according to a 2014 report by the NGO ActionAid. That equals an area larger than Germany.

Our approach to resettlement is set out in our Community Relations Management System (CRMS) and Community Relations Standard. Barrick has also developed guidance for sites contemplating resettlement to help them align with best practice.

When faced with resettlement, sites are required to develop a Resettlement Action Plan (RAP). RAPs are developed with input from the affected communities and local authorities. A comprehensive RAP includes an entitlement framework, comprehensive compensation standards, livelihoods development programs, and ongoing monitoring and evaluation. These activities, complemented by continuous engagement, help us to deliver on our commitment to improve or, at least, restore the livelihoods and living standards of displaced families and communities.
STATEMENT OF BARRICK GOLD CORPORATION PURSUANT TO THE MODERN SLAVERY ACT

This statement is consistent with the UK Modern Slavery Act 2015. At Barrick, respect for human rights is a core value that governs our business, and we expect alignment with that value by the entities in our value chain. That includes an absolute prohibition on forced or compulsory labor, child labor, bonded labor, and labor trafficking. Although Barrick does not fall within the jurisdiction of the Act, it provides this report voluntarily, to show its support for the UK’s efforts to eradicate modern slavery and human trafficking in all of its forms.

Supply Chain Overview

Barrick maintains roughly 10,000 first tier suppliers on a global basis. It is a diverse value chain, composed of large multinational companies, as well as small local suppliers. We believe that each entity, regardless of its location or size, has its own independent duty to respect human rights. The following are among the ways we seek to obtain alignment by our suppliers with our core value of respecting human rights:

Standards & Due Diligence

Human rights considerations are included within our Global Vendor Onboarding Standard, which provides that human rights due diligence will be conducted on all third parties before they are engaged. We also may conduct enhanced due diligence on suppliers who may have elevated risks of negative human rights impacts or who provide goods or services on-site. Human rights due diligence is also part of the standard process for hiring prospective personnel.

We have developed a Supplier Code of Ethics (SCOE) that each supplier must certify to as a condition of working with Barrick. The SCOE encompasses the 10 principles of the UN Global Compact, including in regard to forced and compulsory labor.

Likewise, Barrick has adopted a policy demanding adherence to the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. This policy reaffirms our prohibition of forced and compulsory labor.

The Policy covers our people, as well as the third parties with whom we do business. Similarly, Barrick’s Human Rights Policy expressly states, “Barrick does not tolerate the use of child labor, prison labor, forcibly indentured labor, bonded labor, slavery or servitude, and adheres to the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work.” The Human Rights Policy also extends to our people and third parties with whom we contract, and adherence to the policy is part of our third party contracts.

More detail on our human rights policies and procedures can be found in the section above or on Barrick’s website.

Assessments

All of our higher risk sites have undergone human rights assessments as part of our global Human Rights Assessment Program. These assessments are conducted by Avanzar, a respected third-party consultancy. The tool used to guide those assessments evaluates, in detail, whether Barrick has processes in place to prevent forced and slave labor for itself and third parties, and whether evidence of forced or slave labor is present. To date, the assessments have not identified slave or forced labor or evidence of trafficking at any Barrick site. More detail on our assessments can be found in Appendix B.

Training

All of our people receive basic human rights training at induction. Certain personnel whose roles have the greatest potential to impact human rights, including all security personnel, receive annual refresher training and live human rights training.
Approximately 7,350 of our people received human rights training in some format in 2017. A human rights component is also included in Barrick’s Code of Conduct e-training that all our people with computers undergo. As of 2016, that e-training included specific material regarding modern slavery and trafficking, including how to identify modern slavery and trafficking on-site and in local communities, and where to report concerns where suspicions may exist. More details on our human rights training program can be found in Element 4: Training and Advice.

**Reporting and Remediation**

Under our Human Rights Policy, our people and our suppliers are expected to report human rights issues of which they become aware, and we may ask suppliers to periodically provide certifications that they are unaware of any unreported human rights allegations in their work. Reporting mechanisms include anonymous reporting through our hotline, which can be done via telephone or the internet. Where appropriate, we investigate the behavior of existing suppliers and businesses related to human rights issues, and engage with them to provide remediation for negative human rights impacts. More detail on how to report human rights concerns can be found in Element 6: Monitoring and Reporting.
APPENDIX B

HUMAN RIGHTS ASSESSMENTS AT BARRICK

Introduction

A cornerstone of our human rights program is a stand-alone, independent human rights assessment program for Barrick-operated properties. Started in 2011, the program has assessed all high- and medium-risk sites operated by Barrick at least once, and the highest-risk operations have been assessed more than once. The assessments are conducted by Avanzar, a highly respected independent consulting organization that focuses on human rights–related assessments. Avanzar assesses the actual, potential, and perceived human rights risks and impacts at every high-risk Barrick operation and advanced project. In 2015, an assessment was conducted at the Pueblo Viejo mine in the Dominican Republic. In 2016, impact assessments were conducted at the Lagunas Norte and Pierina mines in Peru and the Lumwana mine in Zambia. In 2017, there were Human Rights and Voluntary Principles on Security and Human Rights assessments completed at Jabal Sayid (Saudi Arabia), Porgera (Papua New Guinea) and Pueblo Viejo (Dominican Republic).

Fund for Peace, a well-regarded NGO that works to prevent conflict and human rights abuses, has served as an external and independent advisor to the company in this project. Their role has included reviewing and editing the assessment tool used by Avanzar, providing guidance on the assessment plan, reviewing the reports, and discussing follow-up priorities. Professor John Ruggie, former UN Secretary General Special Representative for Business and Human Rights, may also provide advice and guidance on discrete issues associated with the assessments. Finally, several years ago, we developed a partnership with the Danish Institute for Human Rights, from which we have received detailed assessments of applicable country-level laws and the extent to which those laws are implemented, which has further informed our assessment approach.

The Methodology Used

The third-party assessments of Barrick-operated properties use an assessment tool that covers all potentially relevant human rights and hundreds of individual indicators. The tool focuses on seven categories where extractive companies commonly face the prospect of causing, contributing to or being linked to negative human rights impacts: (1) labor and working conditions; (2) indigenous peoples; (3) economic, social and cultural rights; (4) environment and health and safety; (5) land rights; (6) security; and (7) anti-corruption. Issues related to supply chain, third parties, and vulnerable peoples also are embedded throughout these seven categories. Each of the categories includes several sub-categories, composed of multiple individual indicators, which feed into a three-part question for the sub-category. These questions are: does management have a procedure to address the risk? What actions demonstrate that the procedure has been followed? Do stakeholders believe the company is respecting the human right at issue?

Avanzar’s methodology consists of documentary and desktop reviews to identify areas of greatest risk and concern at a country and site level (including consideration of geographic, social and economic-related risks); determining the assessment scope for each site; semi-structured interviews with Barrick personnel (on-site and by phone); semi-structured interviews with key external stakeholders (on-site and by phone); and draft report preparation for the CCO. The process includes substantial internal and external stakeholder engagement to gather information regarding perceived human rights impacts and to
verify human rights risks and impacts identified. Avanzar’s engagement methodology applies recognized qualitative research methods, including interviews, focus groups, and observation, to capture stakeholder concerns and issues related to Barrick’s operations. Key providers of information include specific external rights-holders whose rights may be impacted by the mine, such as nearby communities, individuals who have been resettled, employees of mine contractors, and individuals who have lodged grievances with human rights implications.

**Drafting the Report and Integration of Findings**

After information is gathered and assessed against the tool, Avanzar provides a draft report to the CCO, incorporating and following our enterprise risk management matrix. The CCO shares a draft report with the external independent reviewer, and then with local management and relevant functional unit personnel who may be involved in managing salient issues. Those comments are reviewed and integrated, and the CCO issues a final report and proposed action plan. This plan is then reviewed, adjusted and adopted by local management and other relevant personnel who may be involved in managing the pertinent issues. Once finalized, the process calls for action plan items to be included in a data system that automatically follows up with the assigned personnel to create accountability for executing the plan. Presentations on the reviews and follow-up are reported on a monthly basis during BPR sessions with senior company leaders, and quarterly to the Corporate Responsibility Committee of the Board of Directors. Avanzar also assesses whether issues identified in prior assessments have been effectively remediated. Where issues are not effectively remediated, we have learned, the causes can be lack of adequately dedicated resources, lack of training or understanding, or simply a lack of prioritization.

The findings, along with other perceived risks of negative impacts, are incorporated into our overall assessment of enterprise risks under our enterprise risk management system, which is presented to and overseen by the Risk Committee of the Board of Directors. Responses to issues and concerns identified by local external stakeholders are generally addressed by Community Relations personnel, management, and others at
each individual site. To the extent tensions arise between mitigating impacts and other business objectives, those tensions may be resolved through dialogue at the Board Committee level, during the BPRs, or in discussions between the CCO and relevant business units.

This assessment approach is distinguished from one-time “stand-alone” assessments, such as predictive assessments conducted during the feasibility and pre-feasibility stages of a project, and functional unit management system assessments designed to measure compliance with policies and procedures at mine sites. However, consistent with our holistic approach, we try to create synergies with other assessments that relate to human rights to help enhance our ability to accurately identify our human rights impacts and risks. Our compliance with the Voluntary Principles on Security and Human Rights, for instance, is assessed regularly through multiple internal and external review channels, with the outcomes considered by the company and Avanzar. Internal assurance work for functional areas whose activities present salient human rights risks, including Community Relations, Safety and Health, and Environment, also occur regularly.

Recent Assessments

In 2017, Avanzar conducted a human rights assessment at the Pueblo Viejo mine, in the Dominican Republic (a high-risk site) and at Jabil Sayid, a joint venture operation in Saudi Arabia.

- At Pueblo Viejo, as in prior years, the assessment was conducted simultaneously with – and to some extent in conjunction with – internal Community, Health and Safety, Environment, and Security audits, which were conducted by auditors from the corporate office.

  The assessment identified two areas of potential negative human rights impacts, specifically, the potential of negative impacts related to labour standards as identified through the site grievance mechanism (specifically, contractors who were not receiving all benefits guaranteed by law), which was a repeat finding from the past assessment, and a delay in the resolution of grievances submitted through the operational grievance mechanism (which could lead to negative rights impacts). The assessment also noted that while steps have been positively taken to address sexual harassment risks identified in prior assessments, workplace violence and anti-harassment training had been put on hold, and creates a risk that incidents may go unreported. The assessment further identified effective mitigation efforts related to risks from past assessments involving the site’s noise monitoring program (noting that the gaps identified in the assessments have been resolved and the community did not voice complaints about noise during the assessment), and workplace anti-discrimination procedures (noting that procedures have been implemented and interviews demonstrated satisfaction with the processes). Of note, the identification in past HRAs of issues and risks related to workplace anti-discrimination procedures have helped inform our larger programmatic efforts on a global basis. However, the repeat finding regarding contractor benefits and working conditions remains an area that warrants further company attention.

- At Jabil Sayid, the assessment noted, there are certain aspects of the domestic legal regime that raise risks of negative impacts. As an example, contractor personnel have claimed that their companies must retain their passports, and an exit visa to leave the country for foreign workers must be obtained by the employer, issues that must be addressed by the site in a manner consistent with human rights norms while complying with domestic laws. The assessment further recommended: processes to verify and/or monitor working conditions for suppliers and contractors, and that some common practices (such as asking irrelevant personal questions during interviews, and not offering certain benefits) create risks of negative impacts; increasing the profile of the operational grievance mechanism; and gaining a greater understanding of the training and screening processes for public security personnel. The assessment found improvements and effective performance in several areas following recommendations in past assessments, including training of site security personnel, and in treating all people fairly and equitably, as positive steps have been taken by human resources in recruiting and discipline determinations.
APPENDIX B

In addition, assessment findings from past years (some of which relate to sites Barrick no longer operates) have included concerns around use of force by security personnel, various issues related to contractors and suppliers (including their lack of awareness of site grievance mechanisms and their respect for the rights of workers to form unions), unequal treatment between nationals and expatriates, and industrial hygiene programs. Overall, for the sites Barrick presently operates, the negative risks and impacts identified in 2016 and prior years do not seem to indicate broader policy or procedural weaknesses, but rather help identify our salient risks and the challenges associated with them, along with discrete implementation issues and issues arising from in-migration at several locations.

Past assessments have also identified examples of good practice and improvements in areas related to Barrick’s salient risks, including in relation to resettlement and consultations, training and vetting of security personnel, participatory water monitoring initiatives, and working with governments to increase access to potable water.

Other previously identified steps that Barrick has undertaken to address noted risks are extensive. Examples include:

- Automating corrective action plans so that appropriate personnel receive timely notifications if the action plans are delayed;
- Strengthening the supplier due diligence programs and onboarding process;
- Enhancing awareness and trust in the implementation of site grievance mechanisms;
- Providing human rights training for grievance officers;
- Conducting certain health impact assessments;
- Continuing a partnership with the White Ribbon Campaign to address gender-based violence at our mine sites;
- Providing third-party training for public security forces;
- Working with international partners to help strengthen the judicial system;
- Increasing the use of alternative screening methods during employment onboarding;
- Improving the training of security guards in ways that include stepped-up use of scenarios;
- Strengthening the culture of whistle blowing, transparency and responsibility; and
- Improving the approach of the Community, Health, Environment, Safety, Security (CHESS) assurance work related to health and safety.
Cautionary Statement on Forward-Looking Information

Certain information contained or incorporated by reference in this document, including any information as to our sustainability strategy and vision, projects, plans, or future financial or operating performance, constitutes “forward-looking statements”. All statements, other than statements of historical fact, are forward-looking statements. The words “believe”, “expect”, “plan”, “objective”, “aspiration”, “aim”, “intend”, “goal”, “priority”, “strive”, “continue”, “estimate”, “potential”, “most likely”, “considering”, “may”, “will”, “can”, “should”, “could”, “would”, “try” and similar expressions identify forward-looking statements. In particular, this report contains forward-looking statements including, without limitation, with respect to (i) Barrick’s environmental, health and safety, corporate social responsibility (including sustainable development, community relations and security matters), and human rights programs, policies and performance including both at Barrick operated mines and joint venture-operated mines in which Barrick holds an interest; and (ii) Barrick’s environmental, social and human rights targets.

Forward-looking statements are necessarily based upon a number of estimates and assumptions that, while considered reasonable by the Company as at the date of this presentation in light of management’s experience and perception of current conditions and expected developments, are inherently subject to significant business, economic and competitive uncertainties and contingencies. Known and unknown factors could cause actual results to differ materially from those projected in the forward-looking statements, and undue reliance should not be placed on such statements and information. Such factors include, but are not limited to: changes in national and local government legislation, taxation, controls or regulations, and/or changes in the administration of laws, policies, and practices, expropriation or nationalization of property and political or economic developments in Canada, the United States, and other jurisdictions in which the Company does or may carry on business in the future; damage to the Company’s reputation due to the actual or perceived occurrence of any number of events, including negative publicity with respect to the Company’s handling of environmental matters or dealings with community groups, whether true or not; our ability to successfully integrate acquisitions or complete divestitures; employee relations; increased costs and risks related to the potential impact of climate change; failure to comply with environmental and health and safety laws and regulations; and timing of receipt of, or failure to comply with, necessary permits and approvals. In addition, there are risks and hazards associated with the business of mineral exploration, development and mining, including environmental hazards, industrial accidents, unusual or unexpected formations, pressures, cave-ins, flooding and gold bullion, copper cathode or gold or copper concentrate losses (and the risk of inadequate insurance, or inability to obtain insurance, to cover these risks).

Many of these uncertainties and contingencies can affect our actual results and could cause actual results to differ materially from those expressed or implied in any forward-looking statements made by, or on behalf of, us. Readers are cautioned that forward-looking statements are not guarantees of future performance. All of the forward-looking statements made in this report are qualified by these cautionary statements. Specific reference is made to the most recent Form 40-F/Annual Information Form on file with the SEC and Canadian provincial securities regulatory authorities for a more detailed discussion of some of the factors underlying forward-looking statements and the risks that may affect Barrick’s ability to achieve the expectations set forth in the forward-looking statements contained in this report.

The Company disclaims any intention or obligation to update or revise any forward-looking statements whether as a result of new information, future events or otherwise, except as required by applicable law.