



## Human Rights Policy

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**SCOPE:** This Policy is applicable to every employee of Barrick Gold Corporation or its subsidiaries, including senior executive and financial officers, and to members of the Barrick Board of Directors. The reporting requirement of this Policy is also applicable to Barrick's contractors and suppliers. The Policy is not applicable to Acacia Mining and the Porgera Joint Venture, which maintain their own human rights policies, or to Jabil Sayid, and may not be applicable at other locations in which Barrick holds a significant interest but does not exercise operational control.

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### RELATED DOCUMENTS

Code of Business Conduct and Ethics
Human Rights Escalation and Reporting Procedure
Policy with respect to the Declaration of Fundamental Principles of Rights at Work
Human Rights Investigation Procedure
Corporate Social Responsibility Charter
Environmental Policy
Safety and Health Policy
Community Relations Policy
Anti-Bribery and Anti-Corruption Policy
Security Policy
Supplier Code of Ethics

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## 1. PURPOSE

The purpose of this document (the “Policy”) is to define Barrick Gold Corporation’s (together with its subsidiaries, “Barrick” or the “Company”) policy with respect to human rights, provide guidance to employees and third party service providers regarding their human rights responsibilities, and identify how Barrick’s human rights policy will be implemented.

The objectives of this Policy are to ensure respect for the human rights of all employees and third parties impacted by Barrick operations, and maintain compliance with relevant Barrick rules and applicable legal regulations.

For the purposes of this Policy, Barrick operations include any aspect of Barrick’s operations or those of its affiliates or subsidiaries, including operations related to exploration, development, construction, security and reclamation. Barrick operations do not include, for purposes of this Policy, Acacia Mining, and may not include locations in which Barrick owns a significant interest but does not exercise operational control.

For the purposes of this Policy, a “contractor” or “third party service provider” is defined as an entity or individual who provides, and receives payment for, services or goods related to any aspect of a Barrick operation, and includes subcontractors.

It is contemplated that detailed procedures will be created to further implement aspects of this Policy.

## 2. SCOPE

This Policy is applicable to every employee of Barrick, including senior executive and financial officers, and to members of the Barrick Board of Directors. The Policy and its reporting requirement are also applicable to Barrick’s contractors and suppliers.

This Policy is intended to supplement all applicable laws, rules, and other corporate policies. It is not intended to supplant any local laws.

## 3. DEFINITION

A human right is a right to which all human beings are entitled. These rights are internationally defined and recognized, and identified in international conventions.

For purposes of implementing this Policy, a human right shall be one recognized by the International Bill of Human Rights, or as otherwise identified or described in this Policy or its relevant implementing procedures. Human rights violations frequently also violate domestic laws, which may include domestic criminal laws, labour laws, laws protecting property, laws protecting civil rights, and other legal provisions.

Barrick strives to act in accordance with the Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

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#### 4. POLICY REQUIREMENTS

It is Barrick’s policy to respect the human rights of all individuals impacted by Barrick operations, including employees and external stakeholders. This Policy requires that the same respect be provided by all Barrick employees (including affiliate or subsidiary employees) and third party service providers. For purposes of this Policy, “external stakeholders” means residents of communities in which Barrick operations take place, employees of third party service providers and other non-employees whose human rights may be directly impacted by Barrick operations.

While governments have the primary responsibility to protect against human rights violations, Barrick recognizes its corporate responsibility to respect human rights.

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.

Barrick does not tolerate the use of child labour, prison labour, forcibly indentured labour, bonded labour, slavery or servitude, and adheres to the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work.

Barrick does not tolerate discrimination against individuals on the basis of race, colour, gender, religion, political opinion, nationality or social origin, or harassment of individuals freely employed. Barrick recognizes and respects the freedom to join or refrain from joining legally authorized associations or organizations, and respects the safety and health of workers.

Barrick does not tolerate threats, intimidation or attacks against human rights defenders.

In its relationship with host governments, contractors and third party service providers, Barrick seeks to avoid being complicit in adverse human rights impacts.

In carrying out this Policy:

- a) Training on Barrick’s human rights expectations and the terms of this Policy will be provided to all new employees, and all existing employees who, by virtue of their position, may have an impact on the human rights of stakeholders.
- b) Barrick will strive to conduct reasonable human rights due diligence to determine the actual and potential human rights impacts of its operations, and seek to employ reasonable measures to mitigate any such impacts.
- c) Barrick will institute procedures and mechanisms that specify how known or suspected human rights violations should be reported by employees and stakeholders, and how such reports are to be investigated. Barrick will strive to protect from retribution all employees who timely report suspected human rights violations.
- d) Barrick will track and monitor reports of human rights violations related to Barrick operations to identify potential control failures, and for other purposes. Barrick will provide periodic internal reports related to human rights allegations and

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investigations made subject to this Policy. Certain information contained in those reports or otherwise related to human rights reports will be made public.

- e) In locations where exploration, development, construction, and reclamation operations are planned to or do take place, Barrick will engage with local stakeholders to identify, discuss, and address human rights concerns.
- f) Consistent with its Community Relations Management System, Barrick will approach local communities where we operate with respect for their cultures, customs and values to take into account their needs and concerns and the impact of our operations, and implement sustainable community development programs with effective management.
- g) Barrick will seek to adhere to the requirements of the Voluntary Principles on Security and Human Rights in its dealings with private and public security providers, local communities, and potential victims of human rights violations.
- h) For relevant third party service providers, Barrick will perform reasonable due diligence, require that human rights terms and conditions be included in contracts, and require periodic human rights reporting and certifications. Barrick will require that third party service party providers are aware of, and comply with, this Policy and the Barrick Supplier Code of Ethics. Certain third party service providers may be required to receive human rights training.
- i) Barrick as appropriate will work with and support host governments, which have the primary responsibility for promoting and protecting human rights, in their efforts to avoid human rights violations and to investigate human rights violations. Barrick will seek to contribute to public discussion about human rights issues, encourage host governments to abide by international agreements and commitments, report human rights violations to the government, and identify opportunities to engage government constructively on human rights issues relevant to our business in the host country.
- j) In instances in which Barrick determines that its employees, affiliates or third parties acting on its behalf have caused adverse human rights impacts, it will consider appropriate mechanisms to mitigate such impacts and remediation. Where violations by employees are proven, Barrick will consider appropriate sanctions and remedies to victims.

## 5. AUDITS

Audits for human rights compliance may be conducted on periodic bases at different sites, of different operating units, and of different contractors, to ensure the terms of this Policy and applicable procedures and guidelines are being met. Audits may be conducted internally by Barrick, or externally by retained third parties. Audit documentation shall include performance improvement action plans.

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## 6. INTERACTION WITH OTHER CORPORATE POLICIES

Respect for human rights in accordance with this Policy requires adherence to other relevant Barrick policies, including, but not limited to, the Code of Business Conduct and Ethics, Human Rights Escalation and Reporting Procedure, Human Rights Investigation Procedure, Corporate Social Responsibility Charter, Environmental Policy, Safety and Health Policy, Community Relations Policy, Anti-Bribery and Anti-Corruption Policy, Supplier Code of Ethics and the Security Policy.

## 7. WAIVER

There is no permitted deviation or waiver from this Policy.

## 8. DISCIPLINE

Any employee implicated in human rights violations or other serious criminal acts may face termination of employment. Any employee who has direct knowledge of but fails to report human rights violations, or other serious criminal acts, of employees or third party suppliers or contractors may face termination. Any employee who misleads or hinders investigators inquiring into human rights violations or serious criminal acts may face termination.

Any contractor implicated in human rights violations or serious criminal acts, who knows of and fails to report human rights violations or serious criminal acts, or who misleads investigators making inquiries into human rights violations or serious criminal acts, will be expected to take appropriate remedial actions and/or may have their contracts reevaluated or terminated, depending on the circumstances.

## 9. REFERENCES

For reference, the International Bill of Human Rights consists of:

- the Universal Declaration of Human Rights (<http://www.un.org/en/documents/udhr/index.shtml>)
- the International Covenant on Civil and Political Rights (<http://www2.ohchr.org/english/law/ccpr.htm>), and
- the International Covenant on Economic, Social and Cultural Rights (<http://www2.ohchr.org/english/law/cescr.htm>).

The Guiding Principles on Business and Human Rights can be found at: [http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)

End of Document.

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## HUMAN RIGHTS POLICY - APPENDIX A

### FREQUENTLY ASKED QUESTIONS

#### 1. What is a “human right”?

For purposes of Barrick’s human rights compliance program, the term “human rights” includes rights to:

- Life;
- Physical safety;
- Own and enjoy property;
- Fair and appropriate treatment in the workplace and in society, including protections for children;
- Fair treatment in the legal system;
- Associate with others for peaceful and lawful purposes;
- Practice and enjoy one’s culture, nationality and religion;
- Maintain individual thoughts and reasonable expression;
- Privacy and familial rights;
- And other rights as spelled out in relevant policies and procedures.

#### 2. What kinds of activities constitute human rights violations?

The kinds of activities vary greatly and can include murder, extrajudicial killing, and physical abuse such as torture, beatings, rape, assault, kidnapping, or attacking peaceful lawful protestors. Violations of rights in the legal system, such as abuse in prison, arbitrary arrest, or the denial of a fair trial, or related to labour, such as child labour, forced labour, or labour trafficking, as well as certain workplace conditions, can all be violations of human rights. Activities violating human rights can also include property related issues, such as forced evictions, denying individuals the right to own or enjoy property, or denial of access to water in certain situations. Measures that prevent people from practicing their religion or having a family, or discriminating against people based on their nationality, sex, race, or other characteristics can also violate human rights.

#### 3. What is the difference between a human rights violation and a domestic legal violation?

There are differences between human rights violations and domestic legal violations. Human rights violations, for purposes of Barrick’s human rights compliance program, are defined by international standards, and tend to involve rights that most countries around the world agree upon. Domestic legal violations normally are broader in scope than human rights violations; that is, human rights generally are a subset of domestic legal provisions. In most instances, conduct that constitutes a human rights violation will also violate domestic laws. Under Barrick’s policies and procedures, information that could suggest human rights violations or domestic legal violations must be reported.

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**4. What does it mean to be complicit in a human rights violation?**

Complicity can mean different things, depending on the circumstances. In many locations, knowingly providing practical assistance to a legal violation defines complicity. Barrick’s goal is to avoid contributing to, encouraging, or facilitating any human rights violation, and to take steps to help ensure that others acting on its behalf do the same.

**5. What are the penalties for human rights violations?**

The legal penalties for committing human rights violations vary. The penalties largely are defined by domestic legal codes, and thus will depend on the countries whose laws may apply, and the nature of the incident. However, most human rights violations bring the potential for severe penalties, which, depending on the circumstances, can be applicable to individuals and the Company. For individuals, the penalties can include lengthy jail terms and harsh monetary fines. For companies, the penalties can include fines, loss of licenses, and other measures. For employees, if you are complicit in human rights violations or serious criminal acts, you should expect your employment to be terminated. Given the seriousness of human rights violations, employees who fail to report human rights violations about which they have direct knowledge, or who hinder investigations into human rights violations by, for instance, misleading investigators, also should expect to be terminated. Barrick’s third party contractors and suppliers likewise will be expected to avoid committing or being complicit in human rights violations, to report human rights violations of which they are aware, to avoid hindering human rights investigations, and to institute appropriate remedial actions in circumstances where they are complicit in or otherwise commit a human rights violation.

**6. How are human rights obligations enforced?**

There are different enforcement mechanisms that may be applicable. First, the government of the jurisdiction where the conduct occurred may, under its laws, take legal action. Second, most countries have laws that can apply outside of their borders, and these sometimes include human rights laws. That can include countries where the victim or perpetrator resides or is a citizen, or even countries that may not have an obvious connection to the event. These countries, too, may take action. Third, the international community has a web of enforcement mechanisms that may apply, depending on the facts. Finally, Barrick itself also may take commercial action in the face of actions that implicate human rights concerns, whether through discipline of employees, reevaluation of contracts, or other means.

**7. If I have questions about whether something may constitute a human rights violation under Barrick’s human rights compliance program, whom should I contact?**

Barrick has resources to provide guidance on whether an action could violate relevant human rights or domestic laws within the meaning of its human rights compliance program. You may contact your supervisor, Human Resources department, Country Executive Director, the Head of Mine Site, Head of Development Project, Head of Country or Regional Exploration, any In-House Legal Counsel, or the Office of the General Counsel (the General

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Counsel and her or his designee(s)). However, please be advised that if you have any doubts about whether an incident may implicate human rights as contemplated by Barrick’s compliance program, err on the side of assuming that the incident does implicate relevant human rights.

**8. How do I know if something constitutes a human rights violation that should be reported?**

It is not important whether you know that something is, or is not, a human rights violation. It is important that you consider the potential conduct at issue in determining whether there is a need to report information. In addition, most human rights violations violate, in one way or another, domestic laws that govern the Company’s operations. If you hear information suggesting that conduct by an employee or third party could violate Barrick’s Business Code of Conduct and Ethics, Barrick’s Human Rights Policy, or other relevant policies that comprise the human rights compliance program, you must report the conduct regardless of whether you know or believe it is a human rights violation. If you hear information suggesting that conduct by an employee or third party could be part of any type of legal violation, or that someone’s legal rights were violated in any way, you must report the conduct regardless of whether you know or believe it is a human rights violation. We do not expect you to report what law or what human right may have been violated. We do expect you to report information related to conduct that seems wrong or improper.

**9. How much information must I hear or learn about to report it? Is a simple rumor that I hear enough to report?**

Given the serious nature of the issues, a simple rumor of misconduct that you don’t know to be true or untrue is enough to report. There is no minimum threshold for relevant reportable information. Rumors can be investigated for veracity, and otherwise can be acted upon in different ways. Other individuals also may report relevant facts that, taken together, can help prove or disprove a simple rumor. Any information that could implicate a human rights issue, or a violation of the law, should be reported. Do not try to apply any subjective judgment to determine whether the rumor is or is not credible.

**10. What information should I report?**

Whatever factual information you have gathered should be reported. In particular, it is important to note the identities of relevant individuals, whether they are witnesses, victims, or perpetrators. It also is important to include details about any incidents, including relevant times and locations, to permit further investigation. We do not expect you to identify rights that you think may have been violated, but only what you may have perceived – that is, what you may have seen, heard, or read.

**11. Whom should I report to and what happens once I report it?**

If a Barrick employee sees or suspects a human rights violation by another employee of the Company or of a contractor of the Company, they must report that incident in a manner consistent with the Code of Business Conduct and Ethics. Set forth below are the designated local management contacts for employees to report concerns or complaints:

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<b>Work Location</b>	<b>Contacts</b>
Mine, country, development project or exploration site	<ul style="list-style-type: none"> <li>• Head of Mine Site / Portfolio Operations</li> <li>• Country Executive Director</li> <li>• Head of Development Project</li> <li>• Head of Country or Regional Exploration</li> <li>• Any In-House Legal Counsel</li> <li>• Head of Country or Site Finance</li> <li>• Head of Country or Site Human Resources</li> <li>• Senior Ethics and Compliance Personnel</li> </ul>
Corporate office and all other office locations	<ul style="list-style-type: none"> <li>• General Counsel</li> <li>• Any In-House Legal Counsel</li> <li>• Head of Internal Audit</li> <li>• Head of Human Resources</li> </ul>

Pursuant to the Code of Business Conduct and Ethics, known or suspected cases of severe human rights violations must be reported through the Formal Reporting Channels.

Once the human rights violation incident is reported, the reporting contact must within twenty-four (24) hours of becoming aware of the report notify the Head Country In-House Legal Counsel or the General Counsel. The duty to report set forth in the previous sentence shall also be applicable to Community Relations Managers, Security Managers and Human Resources Managers who receive a report of a potential violation of human rights in the course of their functional duties. If the Head Country In-House Counsel is notified, he or she shall notify the General Counsel as necessary. Any In-House Legal Counsel who receives a Formal Reporting Channel report of a known or suspected severe violation of human rights shall report the matter to the General Counsel within twenty-four (24) hours.

The Head Country In-House Legal Counsel or General Counsel, as applicable, will assess the report and promptly commence a review and/or investigation, under instructions from counsel and, for matters not requiring reporting through a Formal Reporting Channel, in coordination with the Country Executive Director and the relevant Head of Mine Site, Head of Development Project or Head of Country or Regional Exploration, by the Head Country In-House Legal Counsel, Head of the Asset Protection & Crisis Management function, or the Head of the Corporate Internal Investigations group. Following the report of a potential human rights violation, the General Counsel will promptly alert the President and other relevant personnel as the General Counsel deems appropriate under the circumstances.

Depending on the nature of the report, the Company may be required to, or elect to, report the matter to government authorities.

**12. What may happen if I do not report information of a potential human rights violation?**

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For employees, you may face adverse employment consequences, up to and including termination. For contractors, you will be expected to remediate the situation, as appropriate, and/or may face a termination of your contract. An individual's failure to report information related to a crime can, in some circumstances, itself violate the law. For the Company, it is critical to know about and investigate human rights concerns, and the consequences to the Company for failing to do so can be severe. And the Company will not be excused from failing to know about or investigate human rights or other legal issues because it does not learn of them. Accordingly, if an employee fails to report a human rights violation or serious crime about which they have direct knowledge, the employee should expect to be terminated – just as an employee who is complicit in a human rights violation or serious crime should expect to be terminated. If an employee misleads or hinders investigators looking into possible human rights violations or serious potential crimes, the employee should expect to be terminated.

For contractors, if you or any of your employees commit or are complicit in a human rights violation or serious crime, you will be expected to take appropriate remedial action, and/or your contract may be re-evaluated. If you or any of your employees know of a human rights violation or serious crime by a third party and fail to report it, you will be expected to take appropriate remedial action, and/or your contract may be reevaluated. If you or your employees hinder or mislead investigators making inquiries into human rights violations or serious crimes, you are expected to take appropriate remedial action, and/or your contract may be reevaluated.

**13. Are there any exceptions to reporting potential human rights violations (e.g., are there instances where I should not report information I hear about a potential human rights violation)?**

There are no exceptions to reporting. ALL incidents related to potential human rights violations MUST be reported.

**14. Can I report anonymously?**

Yes, reports through the Compliance Hotline can be anonymous. It is important to understand that no adverse employment consequences will befall individuals who timely report information related to possible human rights concerns. The Company will undertake reasonable measures to try to protect individuals who report in good faith, in a timely manner, from reprisals by third parties.

**15. How will human rights violations be investigated?**

The General Counsel has overall responsibility for the investigation and the decision to bring such an incident to the attention of host-nation authorities, if considered appropriate; for matters not requiring reporting through a Formal Reporting Channel, the Head Country In-House Legal Counsel, in coordination with the Country Executive Director and the relevant Head of Mine Site, Head of Development Project or Head of Country or Regional

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Exploration, will have responsibility for direct oversight of the investigation; and the Head of Asset Protection & Crisis Management Group or the Head of Corporate Internal Investigations Group is responsible for providing investigative input and support for the investigation. The investigation may be conducted by internal or external resources, depending on the facts and circumstances. Reports from investigations will be submitted to the General Counsel, and the General Counsel will brief the President and other applicable personnel, as appropriate and necessary.

**16. What kind of auditing and assurance will be performed to determine compliance under the human rights compliance program?**

The Company will utilize both internal and external auditing processes. Some of the auditing may take place by Internal Audit. Some may take place through external specialists, who may analyze discrete elements of the human rights program. Ultimately, the Company will use varied approaches, general and specific, internal and external, to ensure programmatic effectiveness.

**17. Who will receive human rights training?**

Training will be provided, at a minimum, to all new employees, and all employees who may impact human rights, receive reports or complaints on human rights, and who may oversee programs involving human rights. These will involve management, legal personnel, human resources, security personnel, community relations personnel, individuals involved in administering the supply chain and overseeing third parties, and others.

**18. Does this Policy apply to Acacia Mining?**

No. While Barrick owns a majority interest in Acacia Mining, Acacia operates independently of Barrick, and maintains its own Human Rights Policy and program. Similarly, this Policy may not apply at other operations in which Barrick owns a significant interest but does not exercise operational control, such as Jabal Sayid and Porgera. In such instances, Barrick will seek in good faith to encourage the entities exercising operational control to institute an appropriate human rights policy and programs that strive to comply with the UN Guiding Principles on Business and Human Rights.

**19. What information will be tracked and reported internally and externally?**

The information to be tracked includes the type and frequency of reports related to human rights violations, how a report was resolved, whether the report was deemed credible, how long it took to be resolved, and other similar factors. Some of this information may be released publicly in aggregated form.

**20. How will Barrick seek to engage with host governments, as appropriate, consistent with the Human Rights Policy?**

The nature of that engagement will differ with each government, and each site. The engagement may include activities such as training, financial or in-kind support, program

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design and advice, physical infrastructure projects, community relationship-building, capacity building, and advisory work in drafting laws and regulations.

**21. What policies and procedures are relevant to the human rights compliance program?**

The Code of Business Conduct and Ethics, Human Rights Escalation and Reporting Procedure, Human Rights Investigation Procedure, Corporate Social Responsibility Charter, Environmental Policy, Safety and Health Policy, Community Relations Policy, Policy with Respect to the Declaration of Fundamental Principles and Rights at Work, Anti-Bribery and Anti-Corruption Policy, Supplier Code of Ethics and the Security Policy are relevant to the human rights compliance program. Other policies and procedures likely will be added to this list as they are developed.