

Code of Business Conduct and Ethics



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Code-of-Conduct

One Team, One Mission

MISSION

To be the world's most valued gold mining business by finding, developing, and owning the best assets, with the best people, to deliver sustainable returns for our owners and partners.



Zero harm workplace

Because our people are our greatest asset, safety is of paramount importance. It is inherent in every part of our business and is everyone's responsibility to adhere to our safety standards. As a business, it is an integral requirement to not only ensure the safety of our employees, but also the communities in which we operate. We aim to mitigate known hazards and target a zero harm workplace.

OUR CORE VALUES



Responsible and accountable

Act as owners, respect each other as peers and work as a team towards achieving our mission (One team, One Mission). Take initiative. Own up to mistakes and learn from them. Drive change. Lead by example and always look for ways to make things better.



Partnerships

We foster genuine partnerships and deliver on our commitments to partners. Earn trust, and create transparency to build and enhance enduring partnerships between our employees, shareholders, stakeholders and with the countries and local communities in which we operate.



Build a sustainable legacy

We earn our social license by being a valued member of our host communities by creating economic activity. We manage the impact of our operations and strive to be the industry leader in safety, health and environmental practices.



Results driven

We are results-driven through agile decision-making and disciplined execution. Keep it simple and deliver fit-for-purpose solutions.



World-class people

Attract and develop strong, world-class people who are informed and involved in the processes of the company. Who act with integrity, and are tireless in their pursuit of excellence.



Be honest, transparent and act with integrity

We communicate directly, honestly and transparently. Create platforms to enable employees to feel free to voice their opinions. Act with integrity, always.

Our Ethical Foundation

In practice, the values we follow are simple.

- We operate with honesty, respect and integrity.
- We try to do the right thing at all times, whether or not anyone is watching, or the law says we must.
- We treat our colleagues, third-parties and local community members the way each of us would like to be treated.
- We accept our responsibility to our shareholders and all other stakeholders.





We are fair in our employment practices.

We value diverse backgrounds, skills and global perspectives.

We see our success as dependent on the full participation of all of our colleagues – regardless of personal characteristics unrelated to their performance. We strive to provide equal opportunities in all aspects of employment, and to create a workplace free from discrimination.

We treat each other with dignity and respect. We do not tolerate harassment of any sort, including sexual harassment.





We work hard to be safe and to respect the environment and human rights.

We are committed to providing a workplace that helps us meet our vision of every person going home safe and healthy every day.

We strive to meet recognized industry environmental standards, to institute policies that meet or exceed the environmental laws and regulations that apply to us, and to continuously look for ways to improve our environmental performance.

Wherever we operate, we and the third-parties we work with must respect the human rights of everyone impacted by our operations. We actively seek to avoid causing or contributing to human rights violations where we operate, to prevent negative human rights impacts from occurring where possible, and to provide a remedy where they may occur.



We only engage in ethical business practices, free from corruption.

We conduct business in an ethical manner, from getting new business to obtaining approvals or permits to do our work.

We insist that our dealings with all parties, including our host governments and their officials, will be transparent, ethical and lawful.

We will seek out reputable vendors who share our values.

We have instituted clear processes when anything of value is given to a government, a government official, or anyone or any organization connected with a government or government official.

We only accept any gifts from actual or potential business partners where doing so will not be seen to impair our ability to perform our duties in a fair and unbiased manner.





We appropriately manage and protect information assets.

We protect our physical and non-physical assets discovered through use of our property or doing our jobs.

We will communicate in an honest, transparent and accurate way about our business, while protecting confidential information.

We do not trade on information about our company that is not in the public domain, or tip others to do so.



We are loyal to the company.

We respect that employees and directors may undertake activities outside of their jobs, such as investing their money in competitor companies or potential partners, provided such activities do not conflict with their responsibilities to Barrick.





We work hard to maintain the integrity of our financial records.

We have robust internal processes designed to maintain accurate financial records. Those records serve as a basis for managing our business and helping us fulfill our responsibilities to our shareholders, employees and other partners.

We exercise care in defining, calculating and disclosing mineral reserves and resources.





We speak up when we see or suspect something that could harm us, our employees, or our community members.

We share our concerns openly and honestly, knowing that we do not tolerate retaliation.

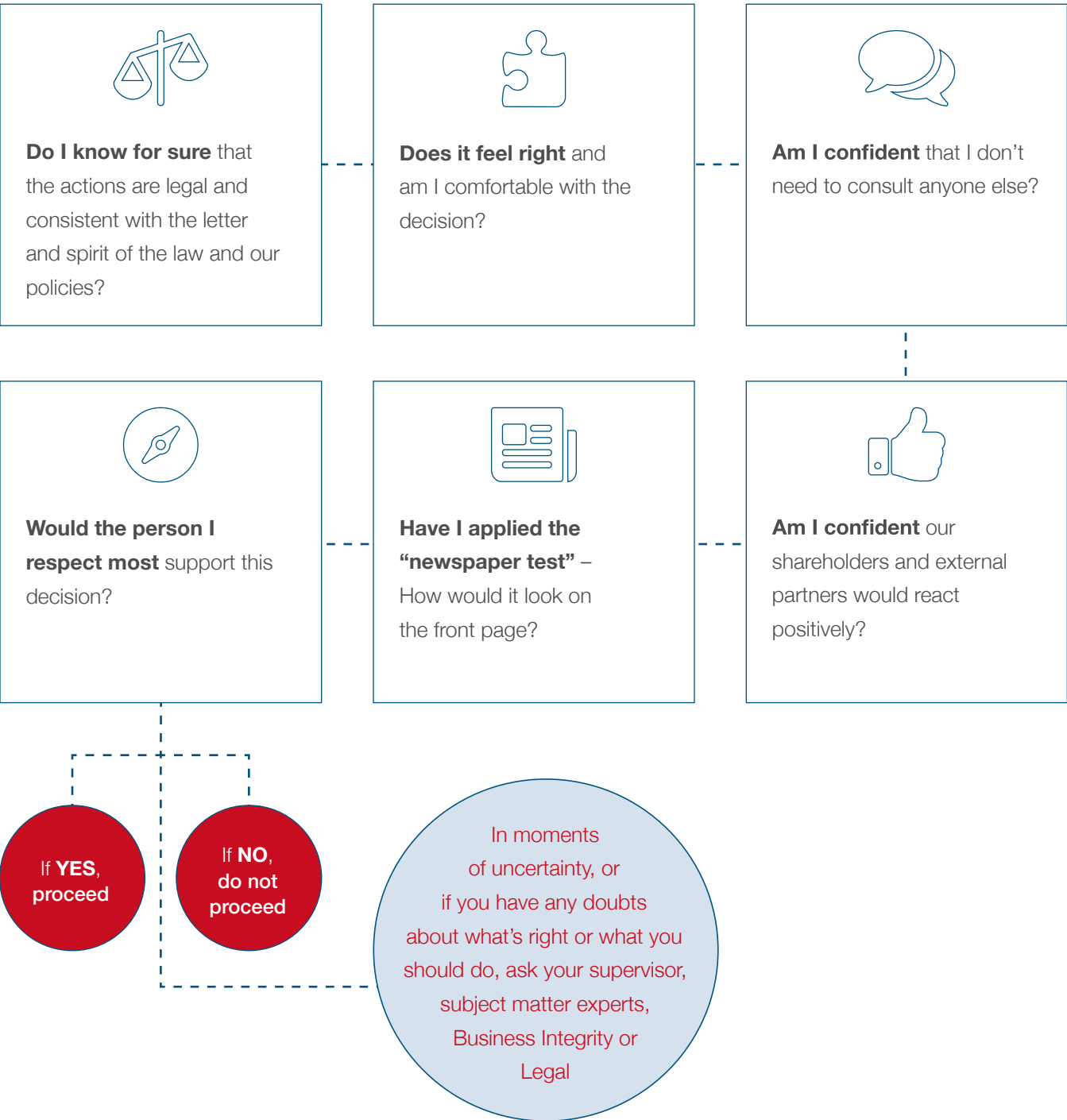
Supervisors have a responsibility to foster an environment where anyone impacted by our business – employees, third-parties, and local community members – is comfortable asking questions and raising concerns.

All employees are required to fully cooperate with investigations by providing complete and accurate information.



Exercise Good Judgement

In some situations, it's not easy to know what to do. If you're ever unsure about how to respond to a particular situation, **ask yourself:**



Submitting Reports

If you have a serious concern, likely to impact SMT at a high level, you should promptly report those matters to the Hotline or management. If you have a personal or minor grievance issue, those should be reported to the appropriate local employee. If you're not comfortable reporting the matter to local leadership, please escalate your report to a local office, company leadership or the Hotline. We provide more detail on selecting a suitable reporting channel below.

If you, as an employee, contractor, third-party or community member, wish to submit a question or concern, non-critical matters can be reported promptly and directly to the relevant department – Human Resources, Community Relations, Environment or Security. These matters can also be directed to any of the following individuals at our operations:

WORK LOCATION	CONTACTS
Mine, development project or exploration site	■ Head of Mine Site / Portfolio Operations ■ Country Executive Director ■ Head of Development Project ■ Head of Country or Regional Exploration ■ Any In-House Legal Counsel ■ Head of Country or Site Finance ■ Head of Country or Site Human Resources ■ Senior Business Integrity Personnel
Offices	■ General Counsel ■ Any In-House Legal Counsel ■ Head of Business Assurance and Risk ■ Head of Human Resources ■ Senior Business Integrity Personnel

If the matter being reported is significant and could result in serious legal or reputational consequences, it should be submitted using formal reporting channels. Significant allegations include

- An alleged misstatement in SMT's publicly released financial statements;
- An alleged misrepresentation in SMT's other public disclosures;
- Any other matter that could reasonably be expected to result in a restatement of SMT's publicly released financial statements;
- Alleged bribery of a government official or other alleged violation of anti-corruption laws;
- Known or suspected human rights violations;
- Known or suspected fraud that involves a potential cost or loss to Barrick exceeding US\$10,000;
- Known or suspected fraud, regardless of amount, that involves an officer of Barrick;
- Known or suspected fraud, regardless of amount, that involves an employee who has a significant role in SMT's internal controls, which includes members of the Executive Committee, Executive Directors and General Managers, other senior personnel at SMT, employees who work in internal audit, finance and accounting or legal functions, and other employees who are designated as holding positions of trust (a list of employees in positions of trust is available from Human Resources); or
- An event or series of events indicative of a deterioration in the overall internal control environment at a SMT mine site, project development site or office, including a known or suspected incident or repeated incidents which indicate significant or systemic non-compliance with applicable regulatory requirements.

For any of the above concerns, employees, contractors and third-parties should use one of the following formal reporting channels:

- To the General Counsel or any SMT In-House Legal Counsel, in person or by telephone, through the contact information posted on Barrick's Intranet;
- Through the Hotline, which can be accessed by telephone or through an Internet portal. To contact the Hotline, follow the instructions set out in the next section and posted on Barrick's Intranet;
- For matters regarding accounting, internal accounting controls and other auditing matters, to the Audit Committee, through the Procedures for Reporting Auditing, Internal Accounting Controls and Audit Related Complaints, which are posted on SMT's website at www.barrick.com and on SMT's Intranet (and to the General Counsel, any SMT In-House Legal Counsel and the Hotline);
- For matters involving the CEO or any other senior executive or financial officer of Barrick, to the Chairman of the Board or any other member of the Board of Directors (and to the General Counsel, any SMT In-House Legal Counsel and the Hotline).

Hotline



We take hotline reports seriously and do not tolerate retaliation against any person submitting a timely, good-faith report.

If an employee, contractor or third-party violates the Code or our policies, they may face disciplinary action based on the seriousness and frequency of the violation, past misconduct, knowledge and intent and prior training received. Disciplinary measures may include additional training or counseling, verbal or written warnings, suspension, termination (in serious cases, such as involving human rights) and restitution.

The Hotline can be accessed anonymously to report concerns, taking into account the need to obtain sufficient information to conduct a thorough investigation. The Hotline is:

- A confidential reporting service operated by an outside service provider
- Available to all employees, as well as contractors, suppliers and community members
- Available 24 hours a day, 365 days per year
- Available via the company's Intranet page or by phone

Reports can be made by phone or online in English, French or Spanish. Phone interpreters are available in other languages. Once a report has been made, the Hotline has a built-in follow-up tool which can be used to check a report's status, ask additional questions or provide updated information.

Related Policies and Standards

For more information on our responsibilities under the Code, please review the following, available on the Intranet or by request from any Legal or Business Integrity personnel.

- Anti-Bribery and Anti-Corruption Policy
- Human Rights Policy
- Global Harassment Standard
- Occupational Health and Safety Policy
- Environmental Policy
- Disclosure Policy
- Anti-Fraud Policy
- Insider Trading Policy

