

Newcrest is committed to conducting business with integrity and honesty, in accordance with the highest ethical standards and in full compliance with the law.



Integrity
and honesty

It is the responsibility of everyone at Newcrest to prevent all forms of bribery, corruption and fraud, all breaches of sanctions laws, and to conduct Newcrest's business in accordance with the highest standards of ethical behaviour at all times.

Eliminating bribery, corruption and fraud benefits the communities in which we operate by promoting the rule of law, good governance, and fair, transparent and ethical business.

This Policy sets out Newcrest's anti-bribery and corruption, fraud and sanctions compliance commitments. It is also supported by standards and procedures setting out minimum requirements which apply to all persons and entities across all Newcrest operations globally and to any person or entity who acts on Newcrest's behalf.

Anti-Bribery and Corruption

'Bribery' involves giving, offering or promising any kind of benefit to any person, with the intention of improperly influencing the recipient or any other person, in order to obtain a business or personal advantage. Bribery occurs whether or not:

- a bribe is given directly or indirectly;
- a bribe is intended to influence a person employed in the public or private sector;
- bribes are viewed as customary, necessary or officially tolerated in a situation; or
- an attempt to improperly influence a person succeeds or fails.

Newcrest strictly prohibits bribery and other related unlawful or improper payments or activities.

We will not bribe or attempt to improperly influence any person (including public officials) to act (or omit to act) in any way that differs from the proper performance of that person's proper duties, obligations, role or standards of conduct. In particular, we will not:

- give, offer, promise, authorise, accept or request bribes;
- make facilitation payments;
- pay or receive secret commissions or payments;
- give, offer or receive gifts, entertainment or sponsored travel in circumstances which could be considered to give rise to undue influence;

- allow any form of money laundering in connection with our business activities;
- use donations and sponsorships or other legitimate business activities to make improper payments.

Payments that would otherwise be prohibited under this Policy are permitted where there is an imminent explicit or implicit threat to personal safety.

Fraud

Newcrest is committed to the prevention and detection of fraud and has zero tolerance for fraudulent conduct in connection with its business.

Newcrest takes any form of fraudulent conduct – large or small – very seriously. We are committed to ensuring full compliance with all laws relating to fraud that apply to our global business and to protecting our reputation, revenue, assets and information from any fraud, deceit or any other improper conduct.

Sanctions

Newcrest is committed to ensuring full compliance with all financial, economic and trade sanctions laws that apply to our global business.

Newcrest requires strict compliance with sanctions. This means that we must always comply with our due diligence requirements and never:

- export or import sanctioned goods to or from a jurisdiction in contravention of a sanctions law; or
- engage in any transaction with a person or entity that is, or is owned or controlled by or acting on behalf of, persons or entities that are 'designated' under Sanctions laws.

World Check sanctions due diligence is conducted in relation to all vendors, and jurisdiction specific information sourced where available, before on boarding vendors and is repeated annually.

Compliance

Newcrest recognises the importance of creating a robust anti-bribery and corruption, anti-fraud and sanctions culture and compliance program.

Newcrest's management, standards, policies, controls and training instill and reinforce a culture across the organisation whereby employees are encouraged to act lawfully and ethically, in a socially responsible manner.

The Newcrest Ethics and Compliance team is established to implement a group wide framework and compliance program to ensure adequate controls and procedures are in place to mitigate against potential risks in relation to key risk areas, including anti-bribery and corruption, fraud and sanctions. Compliance Champions have been appointed at all Newcrest sites and high-risk functions to focus on compliance management and awareness and are supported by and work closely with the Ethics and Compliance team.

Risk Assessment and Due Diligence

The Ethics and Compliance team conducts biennial group wide anti-bribery and corruption, fraud and sanctions risk assessments to ensure any changes in risk profile are identified, and adequate resources committed to managing and mitigating the highest risk areas. Identified risks are also recorded and managed in site and function risk registers, in accordance with the Risk Management Policy.

We undertake risk-based due diligence in relation to our associates, third parties, entry into new jurisdictions, investments and counterparties, which includes specific, anti-bribery, fraud and human rights due diligence. To manage business conduct risks including bribery, corruption and fraud, communities, environment, human rights, modern slavery and supply chain risks, we have a Supplier Risk Framework which includes supplier screening procedures, follow-up procedures for suppliers assessed as high risk, contractual requirements,

and on-going monitoring and compliance procedures.

Training and Communications

Training in relation to key policies including, but not limited to, the Code of Conduct, anti-bribery and corruption, fraud and sanctions promote an understanding of Newcrest's legal obligations and acceptable business conduct.

All high-risk employees, officers and contractors across Newcrest's business undertake online and/or face-to-face anti-corruption, fraud and sanctions training every year. Code of Conduct training, which conveys the way we conduct ourselves in business with our internal and external stakeholders, our policies, values and practices, is also required to be undertaken by all employees and embedded contractors and consultants on hire and every two years as a refresher. Active monitoring of training compliance is conducted by the Ethics and Compliance team.

Regular group wide and local communications about the inherent risks of bribery, corruption, fraud, sanctions and the controls in place to manage these risks are supported by management and communicated by way of bespoke Newcrest news articles, senior management blogs and posters to ensure strong awareness and understanding by its people.

Independent Monitoring and Audit

The Ethics and Compliance team conducts regular monitoring of anti-bribery, fraud and sanctions controls, including but not limited to reviewing financial data, delegations of authority, high-risk contracts and transactions, conflicts of interest and gifts register data to check the operation and effectiveness of key controls.

Independent internal audits are regularly conducted in relation to anti-bribery, corruption and fraud to assess implementation of controls and to identify any transactions and conduct which is not consistent with Newcrest's policies, standards and procedures. Any breaches identified are investigated by the Ethics and Compliance team and actions taken to mitigate any potential risks.

Reporting

There is a standing item on the agenda, for Ethics and Compliance, to report to the executive management team quarterly and to the Audit and Risk Committee six monthly in relation to anti-bribery, corruption, fraud and sanction program risks, trends and mitigating controls.

Continuous Improvement

The Ethics and Compliance team use the results of risk assessments, monitoring, audits and investigations to continue to learn from and improve Newcrest's controls and management of these high-risk areas of its business.

Speak Out and Investigations

We encourage anyone (internal or external) who identifies or suspects instances of bribery, corruption, improper payments, fraud, breach of sanctions laws and any other form of unethical conduct to disclose their concerns via our global confidential whistle-blower hotline, Ethics Point. All reported concerns are managed in accordance with our Speak Out Policy.

The Ethics and Compliance team manages all anti-bribery, fraud and sanctions investigations, however received, and investigates matters in accordance with the Group Investigations Standard.

Approved by the Board December 2020