

# Code of Conduct

The guide to bringing our values to life



Newcrest's Code of Conduct is designed to clearly state the way we conduct ourselves in business with our internal and external stakeholders.

## Our values



Caring about people



Integrity and honesty



Working together



Innovation and problem solving



High performance

## Our purpose

Creating a brighter future for people through safe and responsible mining

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## We care about our people

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Central to our vision is our commitment to live by our values. The first of our values is caring about people.

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The health and safety of our people and communities are our highest priorities. We want everyone to go home safe and healthy every day.

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Our people are our greatest asset and nothing is more important than their safety and security.

### 16 ➔ **Privacy and personal information**

We respect your privacy. We always follow relevant laws when we collect, store, use and disclose personal information.



## We work together

### 19 ➔ **Workplace Behaviour**

Our working relationships are respectful, supportive and professional.

### 22 ➔ **Inclusion and Diversity**

We know that our different backgrounds, perspectives and experiences makes Newcrest a better place to work and fosters high performance.

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Our goal is to be the Miner of Choice for the communities we work with.

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We value our relationships with our suppliers and third parties and appreciate the role they play in helping us to achieve our goals.



## We work with integrity & honesty

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Throughout our global business we act with honesty and integrity and live our values.

### 32 ➔ **Bribery and Corruption**

We strictly prohibit all forms of bribery, corruption and other related unlawful or improper payments or activities.

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GHST can give rise to actual or perceived undue influence. We carefully consider all offers or receipts of GHST and we only offer or receive GHST in accordance with our Business Integrity Standard processes.

### 36 ➔ **Insider Trading**

Insider trading occurs when you possess market sensitive confidential information in relation to Newcrest and you trade in Newcrest shares, or procure that someone else trades in Newcrest shares, or you pass on information to a person who trades in Newcrest shares.

### 38 ➔ **Donations, Sponsorship and Political Contributions**

Newcrest strives to always be a good corporate and community citizen.



## We protect our resources

### 41 ➔ **Protecting Newcrest and Third Party Property**

We are committed to protecting Newcrest confidential information and property at all times and making sure that we only use it for the benefit of the company.

### 44 ➔ **Asset and Technology Management**

Assets include physical and non-physical property, such as equipment, inventory, technology, intellectual property, company information and data.

### 46 ➔ **Cybersecurity, Information and Data Protection**

We're committed to protecting Newcrest business information and data by applying the right level of controls and educating our people on cybersecurity.

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Using and handling information in an accurate way is critical to our integrity and reputation. It's especially important that our company records are accurate.

### 50 ➔ **External Communications**

We communicate with media and other external stakeholders in a timely, fair and consistent way.

### 52 ➔ **Social Media**

Social Media is no different to all other external communications about or referring to Newcrest. We take care to communicate in accordance with our values.



## We promote sustainability

### 55 ➔ **Environment, Social and Governance**

Sustainability is a vital component of our company vision to be the Miner of Choice.

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# About our Code of Conduct

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## Message from our Managing Director & CEO

Each day I'm impressed by the efforts and talents of our people. Your commitment and dedication to supporting each other and our communities is inspiring.

Our success comes from the way we work together, the integrity of our actions, and importantly, in the way we support each other to ensure everyone is treated with respect and dignity and feels safe to speak up.

Our continued growth will be built on a culture that embraces diversity as a strength, recognises inclusion as a powerful driver of progress, and where psychological safety is treated just as importantly as physical safety.

Our Code of Conduct is our blueprint for the way we work. Whether you're an employee, contractor, community member, supplier or stakeholder, our Code of Conduct sets the expectations for people and the benchmark for all of us to live up to. It also supports decision-making when faced with an ethical dilemma.

Embedded into our Code of Conduct are our values: Caring about people, Integrity and honesty, Working together, Innovation and problem-solving, and High performance. These guide how we behave, as we work towards realising our vision – *To be the Miner of Choice*.

Newcrest is a great company, with great people. I am incredibly proud of the extraordinary outcomes we continue to achieve together, as we create a brighter future for the people and communities, we have the privilege to work with.

Please take the time to review our Code of Conduct and do your part in Forging an even stronger Newcrest. I am excited about our future and working with you to ensure a Newcrest that supports and empowers people to be their best, succeed and to thrive.



**Sandeep Biswas**  
Managing Director and  
Chief Executive Officer

### Our vision

Be the Miner of Choice.

- Valued by our people and communities.
- Respected by our partners, customers, suppliers and peers.
- Celebrated by our owners.

### Our purpose

Creating a brighter future for people through safe and responsible mining.

### Our edge

Collaboration, innovation and an owner's mindset.

## Our responsibilities

### This Code of Conduct applies to:

- All our directors, officers, employees, contractors, consultants and third parties who work for or work with Newcrest.
- All our relationships with suppliers and joint venture partners, to understand the way we work and expectations of our people.

### Our expectations of our people

We expect you to follow our Code of Conduct, support our values and comply with local laws.

Our vision is to be the Miner of Choice for our people, for the communities we work with and for our investors. Our Code of Conduct sets out how. It details what we stand for, how we interact with stakeholders and what they can expect from us.

We expect you to act responsibly, ethically, honestly and with integrity. Our Code of Conduct sets out how each of us are expected to behave when we are at work.

Your line manager, the Ethics & Compliance Team or the Chief Legal, Risk and Compliance Officer can answer your questions about what the Code means and how it applies to your work.

### Our expectations of our leaders

We expect our leaders to role model our Code of Conduct by:

- helping team members understand and comply with the Code;
- encouraging questions about the Code;
- demonstrating our values in action;
- making decisions in the best interest of Newcrest; and
- encouraging a culture of inclusivity and diversity.

### Our expectations of our partners

We expect the third parties that we do business with, including governments, suppliers, joint ventures and industry associations to:

- understand our expectations and standards of behaviour; and
- observe the Code's practices and guidelines.

If it's your job to work with Newcrest's third parties, we expect you to be aware of their behaviour and hold them accountable if they breach the Code.

## Breaches of the Code

It's everyone's responsibility to report breaches of the Code of Conduct, our values, the law or other behaviour or activity of concern.

A breach is any behaviour that goes against our Code. Any breach of the Code, or potential breach of the Code, must be reported. If something doesn't seem right, raise it with your line manager. You can also report a breach or concern using Newcrest's confidential Speak Out hotline.

### Our expectations of our people

- Understand how the code applies to you.
- Follow the Code at all times. There may be a situation that the Code doesn't cover. In these cases, act in accordance with our values and use your judgement to make the most suitable and ethical decision. Alternatively, seek guidance from your line manager or Ethics & Compliance Champion.
- Know how and when to Speak Out. We expect you to Speak Out when you become aware of breaches of our values or the Code, breach of law or behaviour or activity of concern for Newcrest.

### Consequences of violations

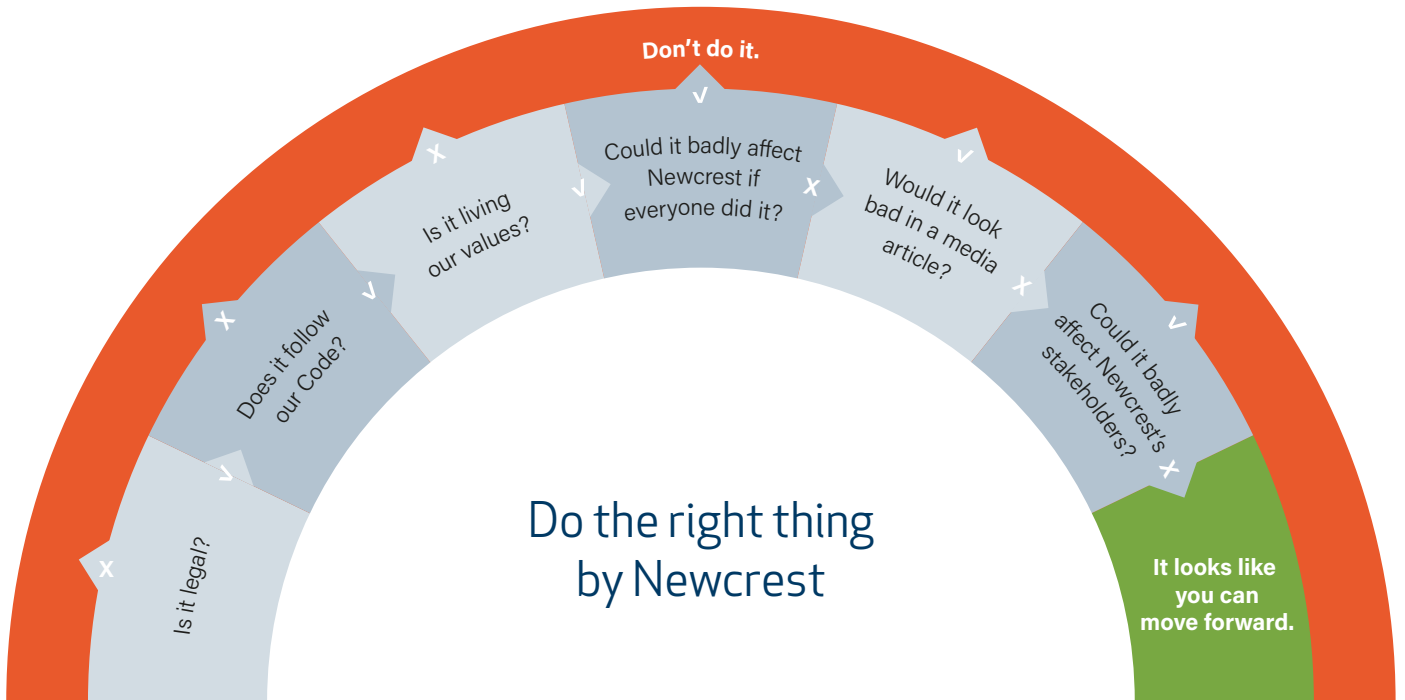
Breaches of the Code are taken very seriously as they compromise our values, practices and our culture of honesty and integrity.

All breaches will be investigated thoroughly in line with our policies and standards.

If you breach the Code or our values, you could be disciplined, including in the following ways:

- Counselling
- Training
- Warnings – spoken and written
- Stood aside from duty for a period of time
- Termination of your employment

## Guidance compass



## In practice

| Scenario  | Response   |
|---|--|
| <p>I overheard a third-party consultant who's working with our team talk to a government official about secret payments.</p> <p>I'm not directly affected by the consultant's behaviour and I don't have proof that they did the wrong thing.</p> <p><b>What should I do?</b></p>                         | <p>Our Code of Conduct applies to everyone, including third-party consultants who work with or for Newcrest.</p> <p>It's your responsibility to uphold our high standards of ethical behaviour. Speak to your line manager about what you saw and heard.</p> <p>If you're uncomfortable speaking to your line manager or with their response, report the behaviour via our Speak Out channels.</p> |
| <p>Chris has recently joined our team and has a lot of experience working for other miners. She suggests we do some things that she says are 'common industry practice'. I'm worried that some of the practices she's suggested don't follow the Code nor our values.</p> <p><b>What should I do?</b></p> | <p>If the behaviour breaches Our Code of Conduct or our values, we don't do it.</p> <p>Just because something is done by others doesn't make it right.</p> <p>Show Chris our values and our Code to help her understand her responsibilities as a Newcrest employee. Raise any concerns you have with your line manager or via our Speak Out channels.</p>   |

## Speaking Out

Key to our Code of Conduct is that we're accountable and transparent.

Everyone who works at Newcrest shares a commitment to follow the Code in word and in spirit.

All current or former Newcrest employees, officers, directors, contractors, consultants, suppliers or relatives of the above are encouraged to Speak Out. Newcrest is committed to a culture of trust, integrity and honesty. We support those who Speak Out and protect your confidentiality and anonymity, if requested, and protect you from any detrimental treatment from doing so.

You're therefore encouraged to Speak Out about any misconduct, anything that may be unethical or illegal, any safety issues or any serious breaches of the Code. We want to know about concerns you are aware of.

It takes courage and integrity to Speak Out about harmful behaviour at work. Newcrest provides you with a choice of channels for reporting so you can Speak Out in the way you are most comfortable. Reports can be made to your line manager, an Ethics & Compliance Champion, eligible recipients or online or by calling our confidential hotline. Reports are treated seriously and confidentially, and may be made anonymously. The Corporate Ethics and Compliance team receive, triage, manage and investigate, or appoint subject matter expert independent investigators to investigate Speak Out reports. When a report is investigated, it's done fairly, competently, promptly and in line with Newcrest's standards and procedures.

## Our expectations of our people

**You're encouraged to Speak Out about misconduct or concerns involving:**

- dishonest, fraudulent or corrupt activity;
- illegal activity;
- safety issues;
- unethical behaviour or serious breaches of our policies or standards;
- behaviour or actions that present a real risk of damage or harm to us, our people or third parties;
- behaviour or actions that could lead to financial loss or damage to our reputation;
- harassment, sexual harassment or assault, discrimination, victimisation or bullying;
- a breach of any law that may impact our business; or
- any other kind of serious misconduct or behaviour.

Personal work-related grievances or complaints about your current or former employment which are unlikely to impact Newcrest's business are better and more effectively managed and reported to your line manager or People Business Partner, not as a Speak Out. Examples include decisions about transfers, structure, promotions, pay, performance management/discipline or the terms of your employment. These personal work-related grievances or complaints should be raised by following the Resolving Workplace Behaviour Complaints Procedure or the Fair Treatment Procedure.

### Learn more

- ➔ [Speak Out Policy](#)
- ➔ [Ethics & Compliance Portal – Speak Out and Investigations guidance](#)
- ➔ [Fair Treatment Procedure](#)
- ➔ [Workplace Behaviour Standard](#)
- ➔ [Resolving Workplace Behaviour Complaints Procedure](#)

### Who to contact for help

Speak Out Protection Officer

Your People Business Partner or a member of the People Team

Ethics & Compliance Champions

Group Manager Ethics & Compliance

Chief Legal, Risk and Compliance Officer



## In practice

| Scenario   | Response  |
|--|---|
| <p>Andrew works at Newcrest. He's told Claire, his wife, about his suspicion that someone in his team has been behaving fraudulently. Andrew recently overheard some unusual conversations between this team member and Newcrest's suppliers.</p> <p>Claire sent an anonymous email to the Speak Out Protection Officer about her husband's observations and concerns.</p> <p><b>What steps will be taken and what protections are available to Claire and Andrew?</b></p>           | <p>The Speak Out Protection Officer will take the following steps:</p> <ol style="list-style-type: none"> <li>1. Remove anything from Claire's report that could identify Claire or Andrew, such as names and email addresses.</li> <li>2. Acknowledge receipt of the report and ask any clarifying questions required to conduct a proper and fair investigation.</li> <li>3. Assess the complaint, consider whether it is protected under Australian or other laws and ensure it is independently investigated. The investigation will follow Newcrest's Speak Out Policy and Investigation Guide and principles of procedural fairness.</li> <li>4. Conduct a 'detrimental treatment' risk assessment and put in place steps to protect Claire and Andrew from any repercussions of making the complaint.</li> <li>5. Conduct the investigation in a timely manner and update Claire, the reporter, on the progress and outcome of the investigation.</li> </ol> |
| <p>I'm covering Luis's job while Luis is on holidays. I received a phone call where the caller thought I was Luis. The caller talked about us paying a bribe to someone who works for one of our customers.</p> <p>I told my line manager and she said she'd deal with it. But when I brought up the topic again with my line manager two weeks later, she told me "it's nothing to worry about".</p> <p>I feel that the issue has been ignored.</p> <p><b>What should I do?</b></p> | <p>If you are concerned about potential corrupt activity – a serious matter which could impact Newcrest's business and/or reputation – you should report it.</p> <p>Raise your concern via one of Newcrest's Speak Out channels:</p> <ol style="list-style-type: none"> <li>1. Your line manager;</li> <li>2. Speak Out hotline – online or by phone;</li> <li>3. Speak Out app;</li> <li>4. Speak Out Protection Officer – by email, mail or phone;</li> <li>5. Ethics &amp; Compliance Champion; and</li> <li>6. Eligible recipient – identified in the Speak Out Policy.</li> </ol>  |

### We do

- Read and understand the Speak Out Policy.

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- Report concerns of misconduct via one of the Speak Out channels.

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- Investigate all Speak Out reports in a serious and confidential manner and treat all persons allegedly involved in a concern fairly, including those named by someone speaking out.

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- Securely store all paper and electronic records related to issues reported via Newcrest's various Speak Out channels.

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### We don't

- Disclose the identity or details of the person making a Speak Out report, without their consent.

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- Use the Speak Out channels for personal grievances or complaints related to our employment. Instead, we first talk to our line manager or People Business Partner and follow the Fair Treatment or Workplace Behaviour Complaints Procedure.

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- Tolerate treating whistleblowers/Speak Out reporters badly as payback for making a report. We don't allow any reprisals, discrimination, harassment, intimidation or victimisation of any reporters and protect people who make a report.

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- Ignore Speak Out reports. We consider, assess and appropriately manage all reports received in line with our Policy.

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## We care about our people

- 09 → Human Rights and Modern Slavery
- 12 → Health and Safety
- 14 → Security
- 16 → Privacy and personal information



## Human Rights and Modern Slavery

Central to our vision is our commitment to live by our values. The first of our values is caring about people.

This means that we prioritise safety and health – we look after the wellbeing of our people and the communities we work with.

Newcrest is committed to respecting the human rights of all our employees, stakeholders and the laws of the countries we work in. We care about how our operations could impact local communities and respect the rights of neighbouring communities. Respecting human rights means 'doing no harm'.

**Our commitment to human rights is key to protecting Newcrest's reputation as an ethical business. These are the important issues that we focus on:**

- In the workplace, we respect our employees' human rights.
- Our suppliers must respect human rights and meet the expectations we've set out in our Human Rights Policy, including preventing modern slavery. We expect our suppliers to prevent child and forced or compulsory labour and other forms of modern slavery, avoid discrimination and observe workers' rights by respecting freedom of expression.
- The communities we work in have the right to an adequate standard of living. This includes the right to water and housing. We're sensitive to how our operations could impact local communities and we remedy unavoidable adverse impacts related to our operations.
- As we protect our people, operations and product, we make sure we manage security in a responsible way. We respect the rights of neighbouring communities. We manage security risks in line with international standards on the proportionate use of force. International standards also govern our use of private security providers or government security forces.



## Our expectations of our people

**Everyone at Newcrest must respect human rights. This means you:**

- Must complete the online Human Rights awareness training.
- Encourage respect for human rights in your business relationships and support human rights in your relationships with our stakeholders.
- Recognise and respect the cultural values, traditions and beliefs of the communities in proximity of our operations. This includes Indigenous Peoples.
- Foster direct, honest and open relationships with other people at work, built on mutual trust and respect for every person's dignity and worth.
- Check for and manage the human rights risks in our operations and supply chain if it's your role to manage these relationships. Conduct human rights checks, known as due diligence, regularly.
- Make sure that security is managed responsibly and that human rights are respected if it's your role to secure Newcrest's operations.

Human rights risks can appear in any country and in any context, so look out for new or developing risks. Remain alert to and report any behaviour that doesn't feel right. Tell your line manager, Social Performance Team or your Ethics & Compliance Champion.

If a supplier, contractor or a community member wants to raise a concern or make a complaint they're encouraged to report via our Speak Out hotline. Newcrest's Speak Out Policy contains more information.

### Learn more

- ➔ [Human Rights Policy](#)
- ➔ [Communities Policy](#)
- ➔ [Indigenous Relations Policy](#)
- ➔ [Environment Policy](#)
- ➔ [Procurement Policy](#)
- ➔ [Security Policy](#)

### Who to contact for help

- Your line manager
- Ethics & Compliance Champion
- Group Manager Sustainability and Social Performance
- Legal Corporate Counsel
- Chief Legal, Risk and Compliance Officer

## In practice

| Scenario   | Response   |
|--|--|
| <p>I overheard a conversation at our workplace between a cleaner and her supervisor that worried me.</p> <p>The cleaner was complaining that she hasn't been paid for her work and that her supervisor is holding her identity documents so that she can't leave. The supervisor told her to shut up and keep working.</p> <p><b>What should I do?</b></p> | <p>Our Procurement Policy requires that our suppliers respect human rights and have procedures in place so they can do what's expected by our Human Rights Policy.</p> <p>It sounds like what you saw and heard is not what we expect from our suppliers.</p> <p>Raise the issue with your line manager, your Ethics &amp; Compliance Champion or via one of our Speak Out channels.</p> |
| <p>At my site we're encouraged to offer jobs to the local community. Some of the people applying for jobs don't have official birth certificates.</p> <p><b>Is it ok to rely on the ages that people tell us as part of their application?</b></p>   | <p>We take the risk of using child labour very seriously.</p> <p>For this reason you'll need to screen all job applicants in line with Newcrest's recruitment processes. For at-risk workers seek other reliable records.</p>  |



### We do

Respect human rights and build a good understanding of our operating context in the countries where we work.

Make respect for human rights part of the way we work. We live out our value of caring for people and consider the impact our work has on others. We follow Newcrest's Human Rights Policy.

Listen to the opinions of others, support diversity and equal opportunity at work and contribute to a safe and healthy working environment.

Apply a human rights lens to our decision making and work. This includes new business processes, acquisitions, joint ventures and work with suppliers.

Take the online Human Rights Training course available via MyLearning. The Human Rights Training course covers all types of exploitation including those identified in Australia's Federal Modern Slavery Act.



### We don't

Step back from our responsibility to look after people as caring for our people is one of our core values.

Ignore human rights as that would be contrary to our values and could lead to negative, legal, financial and operational outcomes and harm our reputation.

Think that the Human Rights Policy isn't relevant because we work outside Australia. The policy applies to every Newcrest employee and contractor no matter where we are located.

Avoid or take short cuts or risks in relation to supplier checks and due diligence.

Skip the requirement that we complete online Human Rights Training.

## Health and Safety

The health and safety of our people and communities are our highest priorities. We want everyone to go home safe and healthy every day.

In our workplace we believe all injuries are preventable. We're committed to zero fatalities and zero life-changing injuries.

Our vision is to have a lasting positive impact on the health and safety of our people. We achieve this vision by identifying risks to health and wellness and put in place controls and safeguards. We set up health strategies to improve the health and prevent harm to our employees, contractors, customers and neighbouring communities.

### We improve safety in three ways:

- We continuously strengthen our safety culture.
- Provide controls for every high-risk task.
- Use the right systems and tools.

To prevent fatalities and life changing injuries we identify high-risk tasks, develop safety controls and verify the controls. We also target wider system risks, such as the way our operating plants are designed, together with precautions for chemical and energy hazards.

## Our expectations of our people

Everyone has a role to play in reducing the risk of injuries and harm to our health. You're expected to do your part to support a safe and healthy workplace. Each of us looks out for each other's health, safety and wellbeing. This means we all take responsibility for upholding a workplace that's free from unacceptable risk.

### Only do tasks where you:

- have the skills, knowledge, experience (training and authorisation) and attitude to complete the task safely;
- understand the timing and quality requirements of the task;
- understand the task's hazards and the possible outcomes of the hazards;
- understand and agree to follow the hazard controls that are required; and
- are fit for work.

Speak up when you see unsafe or unhealthy situations. Report these to your line manager. Take steps to deal with these situations when it's safe to do so.

We each have a responsibility to make sure we're fit to do our job safely. This includes not being impacted by tiredness, alcohol or drugs. If you're not fit to work, you must tell your line manager.

You're empowered to make decisions that will keep you and other people you work with safe. This includes slowing down or stopping a task because it doesn't feel safe. No task is so important that it can't be done safely.

### Learn more

- ➔ [Safety and Health Policy](#)
- ➔ [Safety Group Standard](#)
- ➔ [Health and Hygiene Standard](#)
- ➔ [Health, Safety and Security Portal](#)

### Who to contact for help

Your line manager

Health, Safety and Security Team

Environment, Sustainability, Social Performance and Cultural Heritage (ESSPCH)

Employee Assistance Program

## In practice

| Scenario   | Response  |
|--|---|
| <p>I've recently been diagnosed with an illness and need to take medication every day.</p> <p><b>Do I need to tell my line manager about my medication?</b></p>  | <p>You must ask your doctor how your illness and medication could impact your ability to safely do your job.</p> <p>If your fitness to work could be impacted or you could be harmed, you must tell your line manager. Your line manager will work with you to make sure you get the support you need.</p>  |
| <p>I'm feeling pressured by my team to 'do what it takes' to get the work done. Sometimes this means we take shortcuts and don't put in place all the required safeguards.</p> <p><b>What should I do?</b></p> | <p>Everyone at Newcrest must follow health and safety controls for each and every task. No task should start or keep going without these controls in place.</p> <p>Tell your line manager about your concerns. Know that you'll be supported if you stop the task. If you don't feel comfortable talking to your line manager, talk to your Health and Safety Advisor or report via one of Newcrest's Speak Out channels.</p> |



### We do

Follow the health and safety controls that apply to us at work, including mandatory personal protective equipment (PPE). We also help others to follow our controls.

Stop work when conditions or people's behaviour create danger and report the circumstances immediately.

Report any unsafe conditions, unsafe actions, injuries, illnesses, incidents and near misses to our line manager.

Speak to our line manager if we're worried that a team member could be unfit for work or unable to work safely.



### We don't

Assume that a health and safety problem has been solved by other people.

We ask, clarify and report.

Take shortcuts, rush or do tasks that we're not skilled to do.

Ignore or downplay the health and safety concerns raised by others.

Withhold declaring when we're impacted by tiredness or anything else that harms our fitness for work.

## Security

Our people are our greatest asset and nothing is more important than their safety and security.

We put people at the centre of our decisions and strive to create a safe and secure workplace. Our approach to security takes into account all stakeholders such as local communities and governments. Our approach also shows our commitment to respecting human rights.

### Our security programs focus on:

- protecting and respecting people;
- making sure that our security activities respect and protect human rights;
- protecting our product; and
- protecting our assets.

We review the effectiveness of our security programs regularly so we can continue to improve.

## Our expectations of our people

- We all have a role to play in being aware of security risks and threats at work.
- If you see or hear something that doesn't seem right, we want you to speak up. Tell your line manager or raise the issue via one of Newcrest's Speak Out channels.

### Learn more

- [Security Policy](#)
- [Human Rights Policy](#)
- [Security Operations Standard](#)
- [Security and Human Rights Standard](#)
- [Gold Security Standard](#)
- [Security Code of Conduct Procedure](#)
- [Health, Safety and Security Portal](#)
- [Environment, Sustainability, Social Performance and Cultural Heritage \(ESSPCH\) Portal](#)

### Who to contact for help

- Your line manager
- General Manager Health, Safety and Security
- Group Manager Security
- Ethics & Compliance Champion



## In practice

| Scenario   | Response  |
|--|---|
| <p>I've recently noticed things missing from the storeroom on-site which seems suspicious to me. The items aren't costly and can be easily replaced.</p> <p><b>What should I do?</b></p> | <p>You should talk to your line manager about your concerns.</p> <p>Even though the items aren't costly, if the items are being stolen, over time they can add up to major costs for your site and Newcrest.</p> <p>We're committed to providing our people with a secure workplace. We want everyone to feel safe and secure at work. So it's important to speak up about suspicious activity.</p> |
| <p><b>How do I report a concern that I have about security without putting myself at risk?</b></p>   | <p>If you're concerned about reporting an issue to someone you work with, you can raise it via one of our Speak Out channels. Or reach out directly to the Group Manager Security.</p>  |



### We do

Treat everyone with care and respect. We safeguard people's dignity and privacy.

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Respect and follow local laws.

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Speak up or make a report if we see or hear something that doesn't seem right.

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Play our part to prevent access to our workplace by people who shouldn't be there.

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Take care with our keys and access cards.

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### We don't

Start, or continue to spread, inappropriate conversation about a person's private information that we are privy to due to our job.

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As a foreigner in a country, defend our actions when deemed inappropriate or contrary to local laws by arguing that our actions are acceptable in our country of origin.

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Ignore suspicious activities.

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Hold security doors open for people who we don't know.

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Lend our security passes to our team members.

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## Privacy and personal information

We respect your privacy. We always follow relevant laws when we collect, store, use and disclose personal information.

We're committed to making sure that when we collect, store, use or dispose of information about you, we do it properly and respectfully.

We only collect personal information from you if we need this information to carry out our business operations and to comply with applicable laws. Sometimes we may also collect sensitive information because it's required by workplace or equal opportunity laws and to improve our workplace diversity. For example, we may ask you for your vaccination status. At times we also need to do criminal record and medical checks as part of our work. If we need to collect sensitive information from you, we will get your consent first.

Contact our Privacy Officer to get access to, or correct, the personal information that we hold about you. We may need to verify your identity before giving you access to your personal information.

## Our expectations of our people

**We expect everyone at Newcrest to follow our Privacy Policy and Standard. This means that you:**

- Only collect, store, use and disclose personal information where it's necessary to carry out our business and is allowed by law.
- Always treat the privacy and personal information of other people with care and respect.
- Let the Privacy Officer know if your or someone else's personal information has been compromised as soon as possible.

### Learn more

- ➔ [Privacy Policy](#)
- ➔ [Privacy Standard](#)
- ➔ [Ethics & Compliance Portal](#)
- ➔ [Employee Records Standard](#)

### Who to contact for help

Your line manager

Ethics & Compliance Champions

Group Manager Ethics & Compliance

Privacy Officer [privacy.officer@newcrest.com.au](mailto:privacy.officer@newcrest.com.au)

People Business Partner

## In practice

| Scenario   | Response  |
|--|---|
| <p>I've received a phone call from someone outside Newcrest asking for my team member's contact details.</p> <p><b>What should I do?</b></p> | <p>You mustn't disclose someone else's personal information without proper approval or consent.</p> <p>Ask your team member for their consent to disclose their information and seek advice from your Ethics &amp; Compliance Champion if in doubt.</p> |
| <p>I and other members of my team have received an email containing sensitive employee information.</p> <p><b>What should I do?</b></p>      | <p>It's possible that there's been a data security breach. Report the email to the Privacy Officer for investigation immediately.</p>   |



### We do

Tell the Privacy Officer immediately if we suspect or know about a data breach related to our workplace.

Collect personal information directly from individuals.

Tell people why we're collecting personal information and how we plan to use the information.

Protect personal information from wrongful use, loss, unauthorised access, modification or disclosure.

Follow Newcrest's Privacy Policy, Standard and any relevant legal requirements.



### We don't

Access personal information without proper approval.

Use personal information in a different way to the purpose it was collected for.

Keep personal information for longer than is required to carry out our business operations.

Share personal information to anyone inside or outside Newcrest without proper approval or consent.

Stop anyone from updating their personal information or making complaints about privacy concerns.



## We work together

- 19 ➔ Workplace Behaviour
- 22 ➔ Inclusion and Diversity
- 24 ➔ Communities and Indigenous Peoples
- 26 ➔ Dealing with suppliers and third parties



## Workplace Behaviour

Our working relationships are respectful, supportive and professional.

Any harassment, bullying or discrimination based on someone's ethnicity, race, religion, gender identity, sexual orientation, age, physical appearance or disability is unacceptable in our workplace.

### This means at Newcrest there is no place for:

- **Harassment**, which is unwanted behaviour that someone finds offensive, intimidating or humiliating.
- **Sexual harassment**, which includes any unwelcome sexual advance, unwelcome request for sex or other unwelcome sexual behaviour. The test is whether a reasonable person, in similar circumstances, would expect the person harassed could be offended, humiliated or intimidated.
- **Bullying**, which is repeated verbal, physical, social or psychological abuse of a worker by someone or group of people.
- **Discrimination**, which is treating someone worse because of their ethnicity, race, religion, gender identity, sexual orientation, age, physical appearance or disability.

These behaviours can significantly impact someone's physical, emotional and psychological health. We don't accept any of these behaviours in our workplaces.

We educate and build our people's awareness of these behaviours and what harassment, sexual harassment and assault, bullying and discrimination means. This is so that our workplaces are safe and supportive for everyone.

### Our Respect@Work program ensures we're:

- Keeping our people both physically and psychologically safe.
- Encouraging and supporting our people to speak up if they experience or witness disrespectful behaviour.
- Creating safe, inclusive and respectful workplaces.
- Aware of legal and cultural requirements.
- Continuing to positively influence what we believe about each other.
- Opening up the space for discussions on how we prevent sexual harassment and sexual assault.
- Including best practice and continually building in feedback from our people.

We're committed to providing you with a safe and respectful workplace, as everyone has the right to feel safe when they come to work.

## Our expectations of our people

### Each of us has a responsibility to:

- Be respectful of everyone at work.
- Actively make our workplace a psychologically safe place for everyone.
- Support and encourage each other to speak up and start a conversation when something doesn't feel right.

If you experience or witness sexual harassment, sexual assault, bullying or any other unacceptable behaviour at work, we want to know about it. We want Newcrest to be a safe place for you to feel comfortable to report it. We encourage you to use our Speak Out channels to do this or any of the other suggestions on the Respect@Work Intranet site.



### Learn more

- ➔ [Inclusion and Diversity Policy](#)
- ➔ [Workplace Behaviour Standard](#)
- ➔ [Human Rights Policy](#)
- ➔ [Trupla Man, Trupla Meri \(PNG\)](#)

### Who to contact for help

[respectatwork@newcrest.com.au](mailto:respectatwork@newcrest.com.au)

Your line manager

Health and Safety

Security

People Business Partner

Group Manager, Respect@work

Employee Assistance Program

Speak with somebody or a leader you trust on-site

## In practice

| Scenario   | Response  |
|--|---|
| <p>Someone at work comes into my personal space and strokes my arm. I feel uncomfortable.</p> <p><b>What can I do?</b></p>   | <p>If you feel safe to do so, let the person know you're uncomfortable and ask them to stop the unacceptable behaviour.</p> <p>If they don't stop and/or to report the incident speak to Health and Safety, Security, the People Team, your line manager or someone you trust on-site.</p> <p>Or make a confidential report via one of our Speak Out channels.</p>  |
| <p>My manager and others in my team sometimes talk about me behind my back, use disrespectful nicknames to refer to me and call me rude names which upset me. When I object to the things I hear, they tease me and tell me not to be so "sensitive".</p> <p><b>What can I do?</b></p> <p>When I first arrived on site I overheard someone refer to me as "fresh meat". I felt extremely uncomfortable being referred to in this way, and it made me feel personally unsafe. It also made me question whether I could ever be truly valued and included in the company.</p> <p><b>Where can I go for help?</b></p> <p>My manager swears and communicates aggressively in team meetings, and I note that others in the team have also started doing the same. It makes me feel disrespected and undermined, and it has started to affect my and others' confidence – at work, and personally.</p> <p><b>Is this behaviour acceptable?</b></p> | <p>If you're experiencing unacceptable behaviours at work, please speak up and let us know. We're committed to providing you with an inclusive and safe workplace.</p> <p>If you don't feel safe raising this with your line manager or local People Business Partner you can report confidentially via our Speak Out Channels.</p> <p>Alternatively, you can speak to a member of your local Health &amp; Safety team, a Speak Out Protection Officer, the Group Manager Respect@Work or someone you trust on-site who can assist you to report the matter via the appropriate channels.</p> |



### We do

Respect each other and actively strive for a safe and inclusive workplace.

Encourage and support our people to speak up when we witness or experience disrespectful or unacceptable behaviour.

Appreciate and support everyone at work, especially when they come from a different background to us.

Use social media and digital tools appropriately and respectfully of each other.

Create a safe and inclusive workplace where people feel comfortable to express their thoughts and ideas.



### We don't

Accept unwelcome familiarity including touching, staring nor unwanted invitations to go on dates, requests for sex nor intrusive questions about someone's private life, body or gender identity.

Make jokes, insults or tease people about their gender, appearance, religion, sexual orientation, race or ethnicity.

Accept sex-based insults or taunts or sexually explicit emails or SMS text messages.

Distribute or display any inappropriate pictures, posters images or videos.

Belittle, bully or physically intimidate others.

## Inclusion and Diversity

We know that our different backgrounds, perspectives and experiences makes Newcrest a better place to work and fosters high performance.

That's why inclusion and diversity are foundational to our vision, values and company culture. We recognise that creating an inclusive and diverse workplace will help us to find better ways to collaborate, innovate and deliver a high performing culture. Newcrest is being made stronger and more successful because of our inclusivity and diversity.

We actively focus on attracting, retaining and developing diverse teams and we work hard to make sure that everyone feels welcomed, safe and valued at Newcrest.

We want all employees to feel that they can be themselves at work. That you're valued for who you are; that you feel safe to speak up and contribute. We're committed to an environment where everyone feels they belong at Newcrest and are supported and empowered to succeed in their work and life.

Newcrest sets targets, measures and long-term aspirations for inclusion and diversity. We report on how our inclusion and diversity plans are progressing to our Board and to our stakeholders in our Annual and Sustainability Reports. We recognise that creating an inclusive and diverse workplace is everyone's responsibility and has benefits to all. We are committed to embedding inclusion into all aspects of our culture, driven by our leaders and our people, and impacting the workforce experience at Newcrest.

We're committed to maintaining a direct relationship with our employees. Employees have the right to choose whether to belong to a union and to have the union negotiate with Newcrest on your behalf. Newcrest supports local laws and international workforce labour agreements.

## Our expectations of our people

### Each of us has a responsibility to:

- Value and seek to understand the different backgrounds, experiences and views that our global workforce, partners, contractors and communities bring.
- Work together with people and communities who may have different backgrounds to us so we can find new ways to innovate and solve problems.
- Employ, promote and pay people based on their skills or performance rather than their ethnicity, race, religion, gender identity, sexual orientation, age, physical appearance or disability.
- Treat everyone with dignity and respect. Harassment, intimidation or bullying of any kind is unacceptable in our workplace.

### Learn more

- ➔ [Inclusion and Diversity Policy](#)
- ➔ [Inclusion and Diversity Strategy FY21–FY25](#)
- ➔ [Workplace Behaviour Standard](#)

### Who to contact for help

- Your line manager
- Your People Business Partner
- Senior Advisor – Inclusion and Talent



## In practice

| Scenario  | Response   |
|---|--|
| <p>My manager dismisses my contributions in team meetings, and ignores my input in project decision-making. I also feel that they take credit for my work which I think is unfair. My confidence has been eroded and I don't feel appreciated or valued as a team member.</p> <p><b>What should I do?</b></p> | <p>These behaviours do not align with our values and are not inclusive, respectful or acceptable behaviour. Newcrest is committed to ensuring that you feel psychologically safe within the workplace, and that you are, and feel comfortable to speak up. We take this commitment very seriously. We care about our people and that means ensuring that our day-to-day behaviours are professional, supportive, inclusive and respectful.</p> <p>These types of behaviour should be reported to your line manager, if you feel comfortable doing so. Alternatively, you can raise such concerns with your People Team or confidentially, and anonymously if you choose, via our Speak Out channels.</p> |
| <p>My background is very different from the other people in my team. When we get together to make plans and decisions, I often see issues differently to the rest of my team. Yet I stay quiet because I don't want to rock the boat.</p> <p><b>Is this the right thing to do?</b></p>                        | <p>Newcrest is an ambitious global business. It's diverse thinking that'll help us achieve our goals.</p> <p>That's why Newcrest values your ideas and opinions.</p> <p>It's important that you contribute your views because a wide range of opinions helps Newcrest to make better decisions, solve problems and innovate.</p> <p>Your voice matters.</p>  |



### We do

Listen to others with empathy.

Respect, value and include diverse experiences and backgrounds.

Create work environments where everyone feels safe to speak up and contribute.

Challenge and call out behaviour that may exclude or disrespect others.

Show fairness and respect in all our work relationships.

Encourage flexibility so that people's commitments, work and life goals are supported.



### We don't

Tolerate any type of discrimination, harassment or bullying.

Turn a blind eye to behaviour that doesn't meet our standards of respect, safety and inclusion.

Support behaviour, words or actions that exclude or dominate others at work.

Make assumptions about someone's performance, potential or ability based on their ethnicity, race, religion, gender identity, sexual orientation, age, physical appearance or disability.

Make jokes or comments about someone's gender, age, religion, race, ethnicity, sexual orientation, physical appearance or disability.

Behave in a way that may be seen as offensive, insulting, intimidating, malicious or humiliating to others.

## Communities and Indigenous Peoples

Our goal is to be the Miner of Choice for the communities we work with.

We recognise and value the culture, customs and traditions of these communities and work to achieve open and honest long-term, mutually beneficial partnerships.

We're committed to the Free, Prior and Informed Consent (FPIC) principle. This means we consult and engage with all communities that may be affected by our operations in an inclusive way based on good faith. So that communities can freely make decisions they're:

- told beforehand and given enough time to be involved in project decision making;
- fully informed about the potential impacts and benefits of our work; and
- able to either give or hold back their consent to a project.

We are focused on preserving and managing cultural landscape and cultural heritage resources. This includes Indigenous heritage, industrial heritage and historic heritage.

We work in partnership with communities and our approach is underpinned by FPIC, Newcrest policies and international performance standards.

We acknowledge Indigenous Peoples, both past and present, as the First Nation Peoples and custodians of the lands on which we work. We apply internationally recognised principles and practices in all our work with Indigenous communities. This includes engaging communities and people who may not be resident on lands but maintain connection to those lands. We respect the rights of Indigenous Peoples and their cultural heritage.

## Our expectations of our people

Everyone at Newcrest, whether you're an employee or a contractor, must engage with all people and all communities respectfully, transparently and accountably. This includes respecting:

- rights and interests; and
- special connections to lands and waters located on lands traditionally owned by or under customary use of Indigenous and other peoples.

If it's your role, we expect you to use extensive engagement and consultation processes. This is to make sure Indigenous Peoples, communities and broader stakeholders can meaningfully participate in and support informed decision-making. We expect you to obtain the free, prior and informed consent of Indigenous communities, landholders and other communities about issues that affect them.

We expect everyone at Newcrest to:

- Understand the importance of cultural landscape and cultural heritage management to the people we work with and to Newcrest.
- Make sure you take every action to protect Indigenous, historic and industrial heritage.
- Understand the importance of recognising and upholding human rights in all the work you do with Indigenous and non-Indigenous communities.

### Learn more

- [Communities Policy](#)
- [Indigenous Relations Policy](#)
- [Sustainability Policy](#)
- [Human Rights Policy](#)
- [Social Performance Standard](#)
- [Social Performance Guidelines \(Cultural Heritage, Human Rights, Indigenous Peoples and Stakeholder Engagement\)](#)

- [International Council on Mining and Metals \(ICMM\) Principles](#)
- [IFC Performance Standards 5, 7 and 8](#)
- [The Declaration on the Rights of Indigenous Peoples](#)

### Who to contact for help

Your line manager

General Manager Sustainability and Social Performance

General Manager Exploration

## In practice

| Scenario   | Response  |
|--|---|
| <p>We're exploring a new site.</p> <p><b>Why do I need to do a cultural heritage survey?</b></p>                           | <p>Cultural heritage resources are important to the people we work with and to Newcrest.</p> <p>Surveys are essential to understanding where these resources are so we can avoid them and manage risks to the greatest extent we can.</p> |
| <p>I've been asked to work on a community project.</p> <p><b>Do non-Indigenous communities have cultural heritage?</b></p> | <p>Yes, all communities and people have cultural heritage and knowledge. Non-Indigenous heritage is often called historic heritage.</p>   |



### We do

Follow laws, regulations and all voluntary commitments that we sign up to.

Compensate people whose lands, waters and assets are impacted by our activity.

Report openly and without delay on our social and sustainability performance.

Protect and manage cultural heritage resources in partnership with Traditional Owners, First Nations and landowners/holders. This includes Indigenous, industrial and historic heritage.

Exercise cultural sensitivity when engaging with both Indigenous and non-Indigenous Peoples and communities. There may be customs, values and rules that need to be followed so we don't offend.

Follow site land disturbance procedures before any ground work is carried out. Each procedure has cultural heritage requirements that must be met.



### We don't

Disturb land without all the proper regulatory and company approvals in place. This includes the informed consent of Traditional Owners, First Nations and other impacted landholders.

Pay people for access to land outside of the compensation process or pay government officials to give us access.

Keep information to ourselves and only present the positive opportunities. We don't delay reporting issues and concerns.

Disturb Indigenous and non-Indigenous cultural heritage resources without getting all the permissions we require.

Go into a new community without carrying out proper cultural due diligence. This goes beyond cultural heritage and includes understanding values, norms and who the community leaders are.

Carry out activities on undisturbed land when an assessment hasn't been carried out.

## Dealing with suppliers and third parties

We value our relationships with our suppliers and third parties and appreciate the role they play in helping us to achieve our goals.

Because their role is so important, we're committed to excellence in how we deal with third parties and suppliers.

As third parties may play a role in acting for Newcrest, they can impact our reputation. So we select third parties and suppliers that share our values and way of working.

### Our expectations of third parties

#### Third parties have a responsibility to:

- Follow our Code of Conduct and Supplier Performance Commitments when working with us, or when acting for us.
- Follow the law and our way of working in the countries we operate in.
- Maintain the highest level of ethical behaviour and standards, notably if part of our supply chain.
- Actively support our supplier due diligence processes.

We're also committed to working with governments, their agencies and their employees in an honest, open and ethical way. This doesn't mean that we agree with government policies or approve of all government activities in the countries where we operate.

### Our expectations of our people

#### If it's your job to work with our third parties, we expect you to:

- be aware of their behaviour and to call them out if they breach our Code of Conduct; and
- maintain the highest level of ethical behaviour and standards, most importantly if you work on our supply chain.

If you work with government, you must follow all laws that relate to your government relationships. When dealing with government and public officials, you need to assess any potential for bribery or corruption, conflicts or reputational risks for Newcrest.

Record the details of all contact with government or public officials. If you ask government or public officials or their employees to do work for Newcrest, record the terms and conditions.

### Learn more

- [Procurement Policy](#)
- [Procurement Standard](#)
- [Business Integrity Standard](#)
- [Contract Management Process \(CMP\) manual and training](#)
- [Procurement Governance Guidelines](#)
- [Supplier Performance Commitments](#)

### Who to contact for help

- Your line manager
- Head of Procurement
- Local Commercial Manager
- Ethics & Compliance Champions
- Group Manager Ethics & Compliance

## In practice

| Scenario  | Response  |
|---|---|
| <p>We're thinking of using a local specialist equipment supplier. We're doing our usual checks and the supplier isn't giving us all the information that we've asked for. I've asked several times and also offered to help them.</p> <p>This is the only supplier that said it would give us the equipment by the date that we need it.</p> <p><b>Should I use the supplier anyway even though our checks aren't complete?</b></p> | <p>We expect our suppliers to actively support our due diligence process. These checks protect Newcrest from the risks of sub-standard equipment, safety issues, breaches of our values and harm to our reputation.</p> <p>Do not take risks or shortcut checks of our suppliers. Seek advice from your line manager, commercial manager or Ethics &amp; Compliance Champion.</p> |
| <p>We're conducting due diligence checks on a supplier we are proposing to use to supply tires. As part of this process we identify that the supplier has been involved in a number of bribery and corruption allegations, including fines imposed by ASIC, the Australian Regulator.</p> <p><b>What should I do?</b></p>   | <p>This is a red flag and should be discussed with your line manager and brought to the attention of your Ethics &amp; Compliance Champion.</p> <p>You'll be guided on further due diligence questions to consider and whether or not to engage the supplier, taking into consideration potential legal and reputational risks for Newcrest.</p>                                  |



### We do

Comply with Newcrest's Procurement Policy and Standards.

Speak up if we see unethical behaviour in our supplier relationships or in their services.

Hold Newcrest and suppliers to account for what they say they'll do.

Conduct due diligence checks for potential legal or reputational risks for Newcrest.

Record our contact with third parties, including any terms and conditions.



### We don't

Provide any supplier or potential supplier with an unfair advantage.

Try to get around Procurement or Delegation of Authority controls.

Knowingly take part in or tolerate unethical behaviour in our supply chains.

Give, offer, promise, or provide money (or anything of value) to third parties to wrongly influence their decisions.



## We work with integrity and honesty

- 29 ➔ Conflicts of interest
- 32 ➔ Bribery and Corruption
- 34 ➔ Gifts, hospitality and sponsored travel
- 36 ➔ Insider Trading
- 38 ➔ Donations, Sponsorship and Political Contributions



## Conflicts of interest

Throughout our global business we act with honesty and integrity and live our values.

Working with integrity and honesty means that you understand when there's potential for bias or have a conflict of interest with your duty to act in Newcrest's best interests.

A conflict of interest occurs when you have a personal interest that could interfere with your decisions and actions when working and acting in Newcrest's best interests. Conflicts of interest may be actual, potential or perceived by others to be a conflict, whether they are in fact or not.

It is important that all our potential and actual conflicts of interest are identified, disclosed and appropriately managed to ensure Newcrest's best interests are supported and maintained.

We expect conflicts of interest to occur in our industry. To protect reputational damage to yourself and Newcrest it is important that we're made aware of any conflicts of interest. This is so appropriate controls can be put in place to manage these conflicts.

### Examples of where a personal interest could create a potential conflict of interest include:

- Your relationships with relatives, ex-colleagues, community groups or close friends.
- Your personal business interests or obligations.
- Both financial and non-financial benefits for yourself, or others connected to you.

### Some conflict of interest examples which must be disclosed include:

- Having a personal business interest in an organisation that you are aware is tendering for or supplying goods or services to Newcrest.
- Holding investments directly in assets or a business that you are aware is doing business with or on behalf of Newcrest.
- Being involved in hiring, performance evaluating or promoting relatives or close friends at Newcrest.
- Pursuing, awarding or maintaining Newcrest business opportunities which may provide you, close family or friends with direct or indirect personal gain.

## Our expectations of our people

As Newcrest employees our first loyalty is to Newcrest. This means that we must ensure that our decisions are made with Newcrest's best interests in mind. We must not put our own interests ahead of Newcrest's, our customers or the community.

You're expected to immediately disclose all actual, perceived or potential conflicts of interest through Newcrest's Conflicts of Interest Register. This is so that these conflicts can be effectively managed. If you're unsure, talk to your line manager or an Ethics & Compliance Champion.

### If you're a line manager, you must:

- regularly consider how your team's function and activities may impact your team's risk profile; and
- make sure that your direct reports understand their conflict of interest obligations and disclose all actual, perceived or potential conflicts of interest.



### Learn more

→ [Business Integrity Standard](#)

→ [Ethics & Compliance Portal](#)

### Who to contact for help

Your line manager

Ethics & Compliance Champions

Group Manager – Ethics & Compliance



## In practice

| Scenario   | Response  |
|--|---|
| <p>I work in the People Team at Newcrest. My partner, Brian, runs a training consultancy business. I need someone to urgently present a training course and Brian is the obvious choice. He has the skills and he charges competitive rates.</p> <p><b>Is there a conflict of interest here?</b></p> | <p>Yes. If you engage Brian, there is an actual conflict of interest, due to your personal relationship and potential for personal gain. The conflict remains even if he charged standard, fair rates. You must disclose this conflict in the Conflicts of Interest Register to ensure it is managed.</p> <p>Conflicts of interest may arise if you are connected to a supplier, competitor, relative or someone at work. If so, you must make sure that your personal interests don't, or don't appear to, influence your decisions.</p> |
| <p>I told my close friend's son about a job at our site. He's applied. I've been asked to sit on the selection panel for the job.</p> <p><b>What should I do?</b></p>  | <p>Disclose your conflict of interest and excuse yourself from the selection panel as your close personal relationship to him presents an actual conflict of interest.</p> <p>Stepping away from the selection process means you won't be in a position where it could be hard for you to make an unbiased decision.</p> <p>Excusing yourself also helps job applicants and the people you work with to trust that Newcrest's recruitment decisions are fair.</p>   |



### We do

Regularly consider how our personal interests relate to our duties to Newcrest.

Openly discuss with our line manager any conflict of interest as soon as we know about it.

Excuse ourselves from any decision making process that could impact our ability to make impartial decisions.

Report all actual, perceived or potential conflicts of interest in Newcrest's Conflicts of Interest Register.



### We don't

Hire, supervise or have decision-making influence over a family member or close friend.

Do any type of paid employment for other employers while working for Newcrest, unless approval has been given first.

Wrongly use Newcrest resources for our personal benefit or for someone else's benefit.

Act or make a decision that's motivated by our own personal interests that are or may compete with Newcrest's.

Damage Newcrest's or our reputation by having undisclosed and unmanaged conflicts of interest.

## Bribery and Corruption

We strictly prohibit all forms of bribery, corruption and other related unlawful or improper payments or activities.

Corruption occurs when people in positions of power act dishonestly or fraudulently for their own private gain. Bribery is a form of corruption, as is extortion, deception, collusion, cartels, embezzlement and money laundering.

Giving, offering, receiving, promising or asking for any kind of benefit to influence someone to get a business or personal advantage is bribery. It's unethical, a breach of trust and illegal.

Bribery takes many different forms and is not always obvious. Bribes can be made using cash, charitable donations, paying travel expenses, unwarranted sponsorships, excessive gifts or entertainment. Bribes also include payments for preferential treatment or inside information and favours for relatives.

It doesn't matter whether a bribe is made directly or indirectly, such as via an agent, or whether it's successful or not. Even if accepted in the local country, bribes are illegal in Australia and prohibited by Newcrest.

Bribery and corruption in all its forms is unethical and illegal. It destroys trust, creates inefficiency and increases inequality in the communities we work in.

We always work to the highest ethical standards and are committed to doing business with integrity and honesty.

## Our expectations of our people

Everyone at Newcrest must prevent all forms of bribery and corruption. We all work together to:

- Promote a culture that does not tolerate bribery or corruption.
- Protect Newcrest against the risk of bribery or corruption happening.

To ensure this we don't bribe or try to improperly influence anyone to do anything different from their job requirements. Bribing someone not to do something when their job is to do that something is also wrong, such as turning a blind eye.

We don't give, offer or authorise extra or off-the-record payments to speed up or get routine government tasks done, such as processing applications for visas or licences. Paying extra for someone to do a normal part of their job is called a facilitation payment. Even if it's the local custom, we don't make facilitation payments.

Don't give, offer or authorise secret payments/commissions to third party agents to influence the decisions of their business/government connections. Even if a third-party agent applies pressure, we don't pay or receive secret commissions.

Newcrest can be responsible for the actions of third parties we work with or agents acting on Newcrest's behalf. So, if it's your role to manage our relationship with third parties, it's important that you've conducted checks and know who you're dealing with. Check their business reputation and whether there are any clues or indications from their past actions which we should be aware of when considering working with them. These checks, known as 'due diligence' should be conducted regularly so we're aware of any relevant changes.

Newcrest has developed group-wide controls to reduce the potential for bribery and corruption. Make sure you know what these are. Your site-based Ethics & Compliance Champions can help with guidance and training.

Whatever your role, ask for help if you're not sure about what to do. If you suspect bribery or corruption of any kind, it's your responsibility to make a report. Tell your line manager, an Ethics & Compliance Champion or raise the issue via one of our Speak Out channels.

### Learn more

- [Anti-Bribery, Fraud and Sanctions Policy](#)
- [Business Integrity Standard](#)
- [Donations and Sponsorships Policy](#)
- [Ethics & Compliance Portal](#)

### Who to contact for help

- Your line manager
- Ethics & Compliance Champions
- Group Manager – Ethics & Compliance
- Chief Legal Risk and Compliance Officer

## In practice

| Scenario   | Response   |
|--|--|
| <p>My team is applying for an exploration licence overseas and has employed an agent to help with local government negotiations. The agent asked for a large, extra amount for 'other fees', which I understand will be used to make sure the local government provides the licence.</p> <p><b>What do I do?</b></p> | <p>This may be a bribe even though the extra amount isn't paid directly. As the agent is acting for Newcrest, Newcrest could be prosecuted in Australia and/or the overseas country for foreign bribery depending on local laws. Fines and prison sentences apply for individuals and the company.</p> <p>Don't turn a blind eye to this behaviour. Make sure you're very clear on what you're asking for, paying for and what's stated on invoices. Report any suspected or actual unethical conduct to your line manager, Ethics &amp; Compliance Champion or via Newcrest's Speak Out channels as soon as possible.</p> |
| <p>A tender for supplying mining materials is being run by Sam, the procurement manager. I heard Sam asking Company A for a cash payment in exchange for inside information about the other tenderers and to ensure Company A gets the contract.</p> <p><b>Should I do something?</b></p>                            | <p>This is a bribe and is illegal. It could result in Newcrest paying too much for materials, sub-standard materials and possible safety issues.</p> <p>If you've any suspicions about the transparency or fairness of procurement tendering processes, report them immediately.</p>   |



### We do

Promote Newcrest's commitment to eliminate bribery and corruption in all its forms.

Appropriate due diligence and understand the interests of companies and individuals we do business with.

Accurately and fully document relevant information about all transactions when they happen.

Record conflicts of interest, gifts, hospitality, sponsored travel, donations and sponsorships in the relevant registers and obtain required approvals.

Report concerns or suspicions of bribery, corruption, improper payments, fraud or any other form of unethical conduct to our line manager or an Ethics & Compliance Champion.



### We don't

Give, offer, authorise or ask for any kind of benefit with the intention of influencing someone to obtain an unjustified business or personal advantage.

Allow any form of money laundering in connection with our business activities.

Offer or pay bribes, regardless of where we operate, the circumstances or who is involved. Nor do we expect our agents or third parties to do so.

Hide transactions, gifts or receipts by splitting payments into smaller amounts.

Grant another person favours with the expectation of receiving a benefit, such as a contract for a family company.

## Gifts, hospitality and sponsored travel

GHST can give rise to actual or perceived undue influence. We carefully consider all offers or receipts of GHST and we only offer or receive GHST in accordance with our Business Integrity Standard processes.

We don't offer or receive any GHST in situations that could be, or look like, a conflict of interest or improper influence. Any payment, gift, benefit or hospitality that could be seen to reward or encourage special treatment is also wrong.

GHST includes all types of gifts, meals, hospitality, promotional sponsorship, donations, per diems, accommodation, car and vehicle hire.

People's motives in offering GHST may not be bad. Regardless, giving or receiving GHST may look like the person receiving the gift will favour the gift giver when it's time to take action.

## Our expectations of our people

### Don't offer or receive GHST in situations where it could:

- cast doubt on your ability to make an independent decision and remain unbiased; or
- be seen as improper influence.

Know the 'Value Limit' for GHST for your location, as set out in the Business Integrity Standard. If you're offered a gift that's worth more than the Value Limit, the GHST must be recorded in the GHST Register. This is so you can get approval before you accept or provide the gift. If you're given a ceremonial gift of significant value, you may accept it on behalf of Newcrest and give it to your local People Manager.

Occasionally a per diem payment or honorarium payment is required by local law. If so, the payment must only cover the regulated costs of public officials while they're performing the relevant official function. If required by local law, make the payment directly to a government institution or department and make a record of this payment. Do not pay an individual public official directly.

You're expected to follow Newcrest's standards and policies when considering, recording and getting approval for GHST. If you're unsure about what's appropriate to offer or receive, talk to your line manager or your local Ethics & Compliance Champion.

### Learn more

- [Business Integrity Standard](#)
- [Donations and Sponsorships Policy](#)
- [Anti-Bribery, Fraud and Sanctions Policy](#)

### Who to contact for help

- Your line manager
- Ethics & Compliance Champions
- Group Manager Ethics & Compliance

## In practice

| Scenario   | Response  |
|--|---|
| <p>I'm in the middle of a large business deal with Mr Prasad on behalf of Newcrest. A team member has told me that Mr Prasad is planning to present me with a 24-carat gold model of our joint venture exploration site at a formal dinner in one week's time.</p> <p><b>What should I do? Do I accept the gift to keep Mr Prasad onside? What should I offer Mr Prasad in return?</b></p> | <p>Since Mr Prasad is currently in a tender period with Newcrest, you should decline his dinner invitation.</p> <p>Otherwise, consider whether the gift is, or could be seen as, in exchange for a business advantage.</p> <p>Expensive gifts must be declined or only accepted on behalf of Newcrest. In this scenario it's not clear if the 24-carat gold model is to be a personal or corporate gift.</p> <p>When a gift's value exceeds the Value Limit for your location you must record and obtain approval through the GHST Register.</p> <p>If unsure, talk to your line manager or local Ethics &amp; Compliance Champion.</p> |
| <p>We're considering using a particular supplier. The supplier has offered me an expenses-paid tour of their factory in another city.</p> <p>Included in the trip is a three-day, expenses-paid stay in the city.</p> <p><b>What do I do?</b></p>  | <p>The trip offer is extravagant and may be offered to, or perceived to, persuade you to give them the contract.</p> <p>This is potential bribery and unethical and should be rejected in line with our Anti-Bribery, Fraud and Sanctions Policy and Business Integrity Standard. It's also against our Code and values.</p> <p>Report the offer to your line manager, your Ethics &amp; Compliance Champion or via Newcrest's Speak Out channels.</p>  |



### We do

Understand and comply with Newcrest's Business Integrity Standard when giving or receiving GHST.

Record and get approval for GHST when it's required.

Return or decline GHST that hasn't been approved.

Hand over any ceremonial gifts of significant value that we're given to our local People Manager.

Check with our line manager or the Ethics & Compliance Team when we're unsure about whether to accept, return, decline or give GHST.



### We don't

Request, offer, give or accept GHST in return for business services, information or to obtain or provide a business advantage.

Give or offer unapproved GHST to a public official unless required by law.

Ask for GHST from anyone Newcrest does business with.

Offer GHST to an organisation or person currently involved in a bid, tender or contractual negotiation with Newcrest.

Give gifts, hospitality or payments to government officials to speed up a service or to influence a decision. These payments are known as facilitation payments and are prohibited by Newcrest.

## Insider Trading

Insider trading occurs when you possess market sensitive confidential information in relation to Newcrest and you trade in Newcrest shares, or procure that someone else trades in Newcrest shares, or you pass on information to a person who trades in Newcrest shares.

Newcrest doesn't tolerate insider trading. We're committed to making sure that our employees and the people connected to us act with integrity, particularly when buying and selling shares.

Our policies and standards forbid all employees from dealing in Newcrest shares at specified times. You're restricted further if your role potentially gives you access to confidential and potentially

market sensitive information. Our policies and standards are in addition to laws and regulations that ban insider trading.

We also avoid the appearance of insider trading. This is to prevent reputational damage to Newcrest and our employees.

### Our expectations of our people

We expect everyone at Newcrest to be careful when handling and storing Newcrest's market sensitive confidential information. Don't share confidential information with anyone else, including your family and friends.

As an employee of Newcrest, we encourage you to hold Newcrest's shares over the long-term. When you do buy or sell Newcrest shares it's important that you take care.

**In particular, you must not buy or sell Newcrest shares:**

- at specified times when securities trading is prohibited; or
- when you are in possession of market sensitive confidential information that would be likely to impact share prices if made publicly available.

These trading restrictions also extend to people with a direct connection to you, such as your close family members. The Securities Dealing Policy contains more information about who's a connected person and the restrictions that apply to them. You'll need to let your connected persons know about these restrictions.

### Our expectations of our designated persons

If you're a designated person, your role comes with additional responsibilities. Designated persons are:

- executives, general managers and managers (that is, Levels 3 or above); and
- people who've been told by the Company Secretariat Team that they're a designated person because their role gives them access to market sensitive confidential information.

**If you're a designated person, you'll:**

- complete insider trading training every two years to remind you of the key confidentiality obligations that apply to you; and
- ask the Company Secretariat Team for approval before you buy or sell Newcrest shares.

### Learn more

- ➔ [Securities Dealing Policy](#)
- ➔ [Keeping Important Company Information Confidential Guideline](#)

### Who to contact for help

Your line manager  
 Chief Legal Risk and Compliance Officer  
 The Deputy Company Secretary

## In practice

| Scenario  | Response   |
|---|--|
| <p>At work I saw on the printer a document that referred to the unexpected discovery of extensive new deposits at our site. It's information that hasn't been in the news and I haven't heard people on-site talk about it.</p> <p><b>Can I tell other people at work or outside work about what I saw?</b></p> | <p>You may have become aware of market sensitive confidential information.</p> <p>Trading whilst in possession of market sensitive confidential information is illegal and known as insider trading. If confirmed the result is serious civil and criminal penalties and reputational damage for you and Newcrest.</p> <p>Do not share or use this information to trade in Newcrest shares, without first checking on its market sensitivity with the Company Secretary.</p>   |
| <p>I've received Newcrest shares as part of my employee incentive plan.</p> <p><b>Do the insider trading restrictions in the Securities Dealing Policy apply to these shares?</b></p>   | <p>The restrictions in the Securities Dealing Policy relating to trading do not apply to the grant of shares to you under an employee incentive plan.</p> <p>However, the insider trading restrictions do apply to your decision to trade and sell the shares. You must not use market sensitive confidential information when making your decision to do so.</p> <p>Furthermore, under the Securities Dealing Policy, you must not trade in shares during a prohibited period and if you are a designated person, you must apply for prior approval to trade.</p> |

### We do

Take care when talking about what we're doing at work and what we see and hear.

Protect market sensitive confidential information from being accidentally disclosed to others.

Get approval from the Company Secretariat Team if we want to buy or sell Newcrest shares and are a designated person.

Complete online securities dealing training every two years if we're a designated person.

Ask our line manager, the Company Secretary or the Deputy Company Secretary if we're unsure whether certain information can be shared or whether we can trade in shares.

### We don't

Disclose market sensitive confidential information or provide trading tips to others.

Discuss market sensitive confidential information in a place where we could be overheard. We don't let confidential information be accessible to or visible to others.

Buy or sell shares when we've learnt market sensitive confidential information.

Ask others to buy or sell shares for us, or suggest that someone else buy or sell shares, when we have market sensitive confidential information.

Trade in Newcrest shares during prohibited periods.

## Donations, Sponsorship and Political Contributions

Newcrest strives to always be a good corporate and community citizen.

This includes having a positive social impact in the communities where we operate and, where appropriate, helping out through donations and getting involved in sponsorship activities.

We make our donation and sponsorship decisions based on a clear understanding of the payment's purpose. In the case of sponsorships, we objectively analyse how the sponsorship would benefit both the recipients and Newcrest.

### Our expectations of our people

If it's your role to make donation and sponsorship recommendations or decisions make sure that you have conducted your due diligence and check that:

- all proposals fit with Newcrest's strategy and meet the criteria set out in our Donations and Sponsorship Policy;
- you understand the initiative's impact on the environment and the community;
- the donation or sponsorship has been budgeted for in annual budgets;
- safeguards are in place such as approval by someone with the right financial delegation and counter-signatures;
- you monitor payments and check that Newcrest's procedures are being followed;
- you monitor donations and sponsorships for performance against projected outcomes;
- you check that funds have reached the right destination and have been spent properly; and
- all donations and sponsorships are recorded in the Donations and Sponsorship Register.

It's important that due diligence checks are also done on the people or organisations that will receive the benefit. We must understand who the ultimate beneficiaries of the donation or sponsorship are and whether there is any reputational risk for Newcrest. This includes checking that the donation or sponsorship isn't linked to:

- a public or government official. This is because Newcrest never makes political contributions and doesn't sponsor political activity; or
- existing or potential customers. This is because there's the risk that the payment could be seen as a bribe.

If you're unsure talk to your line manager, Ethics & Compliance Champion or the General Manager Environment, Sustainability and Social Performance.

### Learn more

- [Donations and Sponsorships Policy](#)
- [Security Policy](#)
- [Business Integrity Standard](#)
- [Anti-Bribery, Fraud and Sanctions Policy](#)
- [Social Performance Standard](#)

### Who to contact for help

- Your line manager
- Group Manager Sustainability and Social Performance
- Ethics & Compliance Champions
- General Manager Environment, Sustainability and Social Performance



## In practice

| Scenario   | Response   |
|--|--|
| <p>I'm trying to organise a sponsorship for a community event.</p> <p><b>Why do I need to jump through so many hoops when I'm happy to pay for the sponsorship out of my budget?</b></p>   | <p>Donations and sponsorships are a risk because they can be an easy way to channel bribes. There's also a risk that donations/sponsorship can be used to obtain personal benefit via receipt of kickback payments in exchange for commercial promises/information.</p> <p>Follow the Donations and Sponsorship Policy together with all checks and processes. These have been set up to protect both yourself and Newcrest.</p>   |
| <p>A local official is campaigning for re-election. She's asked me if she can use our company's seminar room to host a fund raising event for her campaign. She said it'll be at night on a weekend so there'd be no inconvenience to us.</p> <p><b>What do I say?</b></p> | <p>Newcrest never sponsors or makes donations to any political party, politician, elected official or candidate or contributes to political fundraising.</p> <p>Use of company facilities is an in-kind benefit. The local official could favour our company unfairly or seek to reward you personally which would be corrupt behaviour.</p> <p>Use of our premises could also seriously harm Newcrest's reputation as it could look like Newcrest supports the local official's political activities.</p> |



### We do

Get approval from our line manager before offering a community donation or sponsorship.

Get approval from our line manager before involving Newcrest in any business activity that's linked to any political party or political activity.

Undertake due diligence on recipients of donation or sponsorship money to identify links and risks. Always follow financial safeguards.

Make sure that our personal interest in an organisation doesn't create a conflict of interest as an employee of Newcrest. We keep our personal interests separate from our work.



### We don't

Provide donations or sponsorships to individuals, unless it relates directly to and supplements our employees' own charitable efforts.

Accept a donation that's aimed at wrongly influencing a business decision or to obtain favours.

Make donations to any political party, politician, elected official or candidate for public office in any country on behalf of Newcrest. Newcrest never makes contributions to political fundraising events.

Make cash payments of donations or sponsorship to individuals.



## We protect our resources

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## Protecting Newcrest and Third Party Property

We are committed to protecting Newcrest confidential information and property at all times and making sure that we only use it for the benefit of the company.

Newcrest property includes physical property such as facilities, equipment, vehicles, computers and information technology systems. It also includes financial assets such as money and non-physical property such as intellectual property and confidential information.

Intellectual property includes patentable inventions, registered designs, copyright works and trademarks. Confidential information includes commercially sensitive information, business information and data, trade secrets, confidential operating procedures and know-how. Intellectual property and confidential information are found across our business. It's in operational processes, specifications, plans, drawings, financial data, equipment, software, branding and written documentation.

Intellectual property and confidential information are strategic and valuable assets. Their value can be lost if not managed correctly. Risks include sharing or using it in the wrong way, incorrect contractual wording and a failure to seek proper safeguards.

We are committed to complying with applicable laws in relation to intellectual property. We also respect the intellectual property rights and confidential information of third parties. Using intellectual property and confidential information of third parties in the wrong way can result in disputes. It can also damage Newcrest's reputation.



## Our expectations of our people

Everyone at Newcrest must protect Newcrest property against damage, loss, theft or unauthorised access.

It is expected that you:

- Only use Newcrest property when it's required by our work and to benefit the Company.
- Always follow our policies and procedures.
- Do not change, destroy, throw away or take Newcrest property without the right approval.
- Do not share Newcrest's intellectual property or confidential information without the right approval.
- Set up confidentiality agreements or make sure that third parties have agreed to confidentiality in writing before you share intellectual property and confidential information.
- Return all Newcrest property at the end of your employment.

It is also expected that you respect the intellectual property and confidential information of third parties such as our suppliers and competitors. Only use and share the intellectual property and confidential information of third parties as allowed by confidentiality agreements and third-party licensing terms.

**If you're unsure, talk to your line manager or the Legal Team. Tell your line manager or consult with Legal if you:**

- Suspect fraud, theft or wrongful use of Newcrest property.
- Suspect or become aware of the wrongful use of third-party intellectual property or confidential information.
- Think intellectual property could or has been created out of a project or work with third parties. Legal can make sure that Newcrest has the right contract terms and other safeguards in place.

### Learn more

- ⇒ [Intellectual Property Strategy](#)
- ⇒ [Information Technology and Data Management Policy](#)

### Who to contact for help

Your line manager

Legal Team

## In practice

| Scenario  | Response   |
|---|--|
| <p>At work I invented a device that's helping our team to be more efficient. I think it could also help other companies.</p> <p><b>Who owns this intellectual property?</b></p> | <p>As set out in your employment contract, all intellectual property created while you are working for Newcrest belongs to Newcrest.</p> <p>This means that you cannot use it for non-Newcrest purposes without first obtaining permission to do so from Newcrest.</p>   |
| <p>I'm finishing up my work at Newcrest. There are a few things from my work that I'd like to keep.</p> <p><b>What can I keep and what must I leave at Newcrest?</b></p>        | <p>When you finish up at Newcrest, you must return all Newcrest property.</p> <p>This includes returning books, access cards, notebooks, software, computers, credit cards, keys, mobile phones, security passes and vehicles.</p> <p>You also need to return documents that include confidential information or relate to the business of Newcrest or any customer or supplier of Newcrest.</p> |



### We do

Set up confidentiality agreements with third parties before starting negotiations or sharing Newcrest's intellectual property or confidential information.

Respect intellectual property and confidential information of third-parties by complying with third-party confidentiality agreements and licence terms.

Only use Newcrest property when required for your work and for Newcrest's benefit.



### We don't

Misuse Newcrest property for our own private benefit.

Change, destroy, throw away or take Newcrest property without the right approval.

Share Newcrest's intellectual property and confidential information without the right approval and a confidentiality agreement in place.

Let third parties use Newcrest's trademarks and logos without the right approval.

## Asset and Technology Management

Assets include physical and non-physical property, such as equipment, inventory, technology, intellectual property, company information and data.

We take care of our assets by doing the right operational, technical and maintenance work at the right time. Asset and Technology management also includes using the right plant and equipment, tools, parts, skilled workforce, applications, networks and systems as set out in our standards, so we work safely and maximise value.

We protect our assets throughout their lifecycle, from design through to disposal and strive to optimise their reliability across the production value chain. Robust information security is a primary consideration when designing, implementing, and using our assets and technology.

This approach helps us to meet our safety, environmental, operational, and financial goals and reduce risks and costs.

### Our expectations of our people

We all have an obligation to safeguard our assets and to use them appropriately. We never knowingly misuse or cause damage to our assets.

Our responsibility to safeguard our assets also includes preventing and detecting fraud.

### Learn more

- ⇒ [Asset Management Diagnostic Guideline](#)
- ⇒ [Asset Management Standard](#)
- ⇒ [Information Technology and Data Management Policy](#)
- ⇒ [Keeping Important Company Information Confidential Guideline](#)
- ⇒ [Security Policy](#)
- ⇒ [Information Technology Usage Acceptance Form](#)

### Who to contact for help

- Your line manager
- Site IT Superintendent
- Cybersecurity Advisor
- Group Manager, Security

## In practice

| Scenario   | Response  |
|--|---|
| <p>There's software that I want to help me do my work.<br/> <b>Can I download and install the software onto my Newcrest device?</b></p>  | <p>No. Only authorised and approved software is allowed on your Newcrest device. Installing unapproved software could put your device at risk of viruses or other malicious cyber vulnerabilities. If you require other software, ask the IT Service Desk. Remember, it is your job to keep your Newcrest provided devices safe.</p>                                    |
| <p>My manager has a personal business. He uses Newcrest's assets for his business including Newcrest meeting rooms to meet with his customers and sends personal parcels on Newcrest's courier account. He also asks me to do small tasks for his business during work time.<br/> <b>Is this acceptable? What should I do?</b></p> | <p>Newcrest's assets should only be used for Newcrest work. You shouldn't do or be asked to do work for an unrelated business during Newcrest work time.</p> <p>Using Newcrest assets for a non-Newcrest matter may amount to theft/fraud.</p> <p>Seek guidance from your local People Team, Ethics &amp; Compliance Champion or report via the Speak Out channels.</p> |



### We do

- Use Newcrest assets for company purposes only.

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- Report any theft, misuse, loss, or fraud of our assets. We report the loss (such as a lost laptop) or theft of Newcrest information to our line manager immediately.

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- Keep devices containing information that relates to Newcrest in a secure location.

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- Use work resources in the way that they're intended to be used.

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### We don't

- Use Newcrest assets for personal gain.

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- Permit unauthorised access to Newcrest sites or offices or access to our data or information technology.

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- Share sensitive data without approval.

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- Try to access sensitive data within applications without approval to do so.

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## Cybersecurity, Information and Data Protection

We're committed to protecting Newcrest business information and data by applying the right level of controls and educating our people on cybersecurity.

We're always improving our cybersecurity capability across Newcrest to prevent viruses, cyber-attacks, theft of our data and damage to our reputation.

Our systems, assets and data are the property of the Company. This includes Newcrest data stored both on your Newcrest devices and your personal devices.

### Our expectations of our people

Everyone is responsible for keeping our systems and data safe. Whether you're an employee, business partner or contractor, we all must play our part. So when you use Newcrest's information technology and operational technology, always follow our company policies, standards, procedures and guidelines.

#### Here's how you can help keep our systems and data safe:

- Don't share your Newcrest passwords with anyone, especially people outside the Company. Don't write or store your password in a way that could be worked out by others.
- If you send our business data to third parties, you need to ensure you conform to the Information Technology and Data Management Policy. Depending on the type of data, you may need the approval of your line manager first. We don't share business data with others when there isn't a valid business or legal need.
- Don't forward emails from your business email address to your personal email address. This is to keep our data confidential as external email providers and personal devices are outside our safeguards. The Information Technology and Data Management Policy sets this out.

- Your Newcrest email address should only be used for work and never be used for personal purposes. So don't use your Newcrest email address when signing up to websites such as career or social media sites.
- Use applications recommended in the Application Usage Standard to safely and securely store documents. Never save Newcrest documents on your PC hard drive, external storage device or other locations such as Dropbox that aren't secure or backed up. Don't copy or transfer files that break any copyright laws.
- Use Newcrest-owned devices and software in the way they're intended. Safeguards have been set-up, so don't remove Newcrest mobile applications or device management software from your company phone or tablet. If you get a security notification or message, don't ignore it. Company assets or employees could be at risk.
- Unsecured networks are unsafe. Don't connect Newcrest devices to them.

If you're unsure about how to use our systems or devices, ask your line manager or Newcrest Information Technology for training. Ask the IT Service Desk if you need software or information technology services from a supplier or third party.

### Learn more

- ➔ [Security Policy](#)
- ➔ [Information Technology and Data Management Policy](#)
- ➔ [Information Technology Usage Acceptance Form](#)
- ➔ [Keeping Important Company Information Confidential Guideline](#)
- ➔ [Social Media Standard](#)
- ➔ [IT and Platforms Portal](#)

### Who to contact for help

Your line manager  
 Site IT/OT Superintendents  
 Manager Infrastructure and Cybersecurity



## In practice

| Scenario  | Response  |
|---|---|
| <p>I think I've received a phishing email?<br/> <b>What should I do?</b></p>                                      | <p>Click on the Report Suspicious button on your Outlook client menu bar. Do this either on your laptop or mobile device.</p> <p>You must also contact the IT Service Desk if you've accidentally clicked on a link that looks suspicious.</p>  |
| <p>I want to share information and data with a supplier.<br/> <b>What's the best way to do this securely?</b></p> | <p>First, always check and verify the identity of the third party when asked for information. If the request is not expected or unusual, ring or text them, rather than using email, to confirm that the request is legitimate.</p> <p>Second, use a secure and protected method to share data. Refer to the Application Usage Standard and guidelines on options to share data securely.</p> |



### We do

Question all requests for access to confidential information or login user names or passwords from people inside and outside the Company.

Ensure that our Newcrest devices are up to date with security updates and fixes provided by Newcrest. This is so that they don't create security problems for our systems.

Lock our screens when leaving them unattended.

Protect and maintain the confidentiality of information about our business, plus details about our people and stakeholders.

Register for Mandatory Multi Factor Authentication to provide extra protection for our systems.



### We don't

Download or copy illegal content from the internet or storage devices onto Newcrest devices. Examples include pornography or anything of a sexual, sexist, derogatory or discriminatory nature.

Illegal downloads can also expose us to cyber-attacks.

Install unapproved apps or systems onto Newcrest devices.

Provide information that isn't public to any person or company without the proper approval.

Open attachments or click on links in emails that come from senders who we don't know or are in emails that we don't expect.

Use any storage solutions that haven't been approved such as hard drives, USB's, personal emails or personal cloud environments to send, receive or store Newcrest data.

Re-use passwords that we've used before. Make sure the passwords that we use for work aren't also used for other websites.

## Accuracy in Company Records

Using and handling information in an accurate way is critical to our integrity and reputation. It's especially important that our company records are accurate.

Each of us create company records when we send emails, write memos, reports and presentations. Company records include financial and non-financial information and accounts. We all have a part to play in keeping accurate company records. This is so that Newcrest continues to meet its obligation to keep the market fully informed about our activities. Our stakeholders rely on us to be open and honest.

### Our expectations of our people

You must make sure that the information you record or report is honest, accurate, timely and transparent. It's important that the records you create don't give a false view of the state of our business. Whether you're writing a negative or a positive report, you need to bring the same clarity and honesty.

Our values – integrity and honesty, caring about people, high performance, working together, innovation and problem solving – guide how we communicate and record information.

We also provide you with standards and policies to help you. We must follow these internal standards as well as financial, legal and regulatory requirements.

If you see or suspect something, or a report doesn't seem right, then please speak up.

### Learn more

- [Document Management Standard](#)
- [Market Releases and Investor Relations Policy](#)
- [Media and External Communications Policy](#)

### Who to contact for help

- Your line manager
- Ethics & Compliance Champions
- Company or Deputy Secretary

## In practice

| Scenario   | Response   |
|--|--|
| <p>My team are capable and trustworthy.</p> <p><b>Is it ok to assume the information they prepare for external release is accurate when I sign it off?</b></p> | <p>You must check the information and ask questions to make sure of your understanding.</p> <p>You need to satisfy yourself that the information is reliable before signing it off.</p>  |
| <p>I help my team process invoices and expenses.</p> <p><b>What evidence do I need to check and keep to support these financial transactions?</b></p>          | <p>When you put through a financial transaction, you need to check that the source documents, such as invoices or receipts, are accurate and complete. You must also save source and supporting documents in Newcrest's systems.</p> |



### We do

Keep accurate, complete and true company records in line with relevant laws, regulations, policies, standards and procedures.

Follow company standards and procedures to make sure all transactions are properly approved and accurately recorded.

Cooperate fully, openly and honestly with internal and external auditors, relevant authorities and regulators.



### We don't

Encourage or allow others to do something that would harm the accuracy or integrity of company records.

Conceal, change or fake records or lie about any facts or situations in company records for personal gain or for other reasons. For example, changing records to try to get a bonus, a pay rise, a promotion or commission.

Destroy company records unless we're confident it's ok to do so.

## External Communications

We communicate with media and other external stakeholders in a timely, fair and consistent way.

As a publicly listed company, we follow laws about how we disclose information so that investors can make informed decisions.

### Our expectations of our people

Sometimes you may know confidential or sensitive information as part of your work, which must not be shared unless you're authorised to do so.

You may have the opportunity to present at or be on a panel discussion at an external conference. Before accepting, you should ask yourself whether the event relates to your job, if there's a clear benefit for Newcrest and importantly get approval from the Head of Group Communications.

**Speak to your line manager or Group Communications if you're unsure about:**

- how to engage with external stakeholders; or
- what can be shared outside Newcrest.

### Learn more

- [Media and External Communications Policy](#)
- [Market Releases and Investor Relations Policy](#)
- [Market Disclosure Policy](#)
- [Social Media Standard](#)
- [Internal Communications Policy](#)

### Who to contact for help

Head of Investor Relations

Head of Group Communications

Communications Manager/Officer

## In practice

| Scenario   | Response   |
|--|--|
| <p>At a weekend BBQ, I shared sensitive information with my sister. She's an equity analyst. The information hasn't been disclosed to the public yet.</p> <p><b>What should I do?</b></p>                          | <p>If you think you've released sensitive information that hasn't been disclosed to the public, you must immediately report it to Investor Relations, a Disclosure Officer or the Company or Deputy Company Secretary.</p> |
| <p>At an industry presentation a colleague put up a slide that included a photo of the new block cave we're working on at site. I'm pretty sure we haven't notified investors.</p> <p><b>What should I do?</b></p> | <p>This may be material information that hasn't been disclosed to the public.</p> <p>You must immediately report it to Investor Relations, a Disclosure Officer or the Company Secretary.</p>                              |



### We do

Follow laws and Newcrest policies about external communication.

Make sure any authorised public communication is clear, timely, fair and consistent.

Avoid disclosing or publishing confidential company information.

Respect confidential information and copyright laws.

Make sure we know what our local site requirements are and follow them. Local sites may control the use of mobile phones, taking photos, video and audio recordings.

Tell our line manager if we're going to an industry or networking event or if we've been asked to speak at an external meeting.



### We don't

Make public statements on behalf of Newcrest, unless we're an authorised spokesperson.

Share material information unless we're authorised to do so.

Use Newcrest trademarks or branding unless we have the appropriate permission.

Speak to the media about Newcrest without first talking to Group Communications.

When making a public disclosure, hide facts or leave out relevant information.

Speak at an event on Newcrest's behalf without the guidance, support and approval of Group Communications.

## Social Media

Social Media is no different to all other external communications about or referring to Newcrest. We take care to communicate in accordance with our values.

Our policies and standards for external communication also apply to social media.

Social media gives us the chance to share our story with people outside the company – our communities, our investors, our industry peers, governments and potential employees. It's important that we do this responsibly.

### Our expectations of our people

You're empowered to speak positively about Newcrest on social media. We encourage you to interact with our official posts by liking, commenting and sharing.

If you want to share Newcrest information on your own personal social media account, you're strongly recommended to take a common-sense approach. Remember that your comments, likes and shares are public for all the world to see. Even if you don't mention Newcrest in your posts, they may still give the impression that they represent the company. This could be because Newcrest is mentioned in your bio or you wore a Newcrest branded shirt in a posted photo.

Make sure you understand the difference between what you can share in public and the role of authorised spokespersons. Don't discuss any confidential or sensitive information about Newcrest on social media. Consult the Social Media Standard, your line manager or Group Communications if you're unsure.

Establishing new external groups, sites or pages using the Newcrest name or logo is not permitted without the right approvals. Establishing accounts using Newcrest's name or logo can harm Newcrest's reputation. You could also undermine Newcrest's official social media channels. Only official Newcrest social media accounts can use Newcrest logos, trademarks and other intellectual property. Contact Group Communications if you see unofficial accounts using Newcrest or joint venture brands.

Make sure you read and understand our Social Media Standard. Speak to your line manager or Group Communications if you're unsure.

### Learn more

- ⇒ [Social Media Standard](#)
- ⇒ [Media and External Communications Policy](#)
- ⇒ [Information Technology and Data Management Policy](#)
- ⇒ [Workplace Behaviour Standard](#)
- ⇒ [Privacy Policy](#)

### Who to contact for help

- Your line manager
- Group Communications Team

## In practice

| Scenario   | Response  |
|--|---|
| <p>I saw a post on Facebook about something taking place at site that I know isn't true.</p> <p><b>Can I make a comment to correct the information?</b></p>  | <p>No. Unless you're an authorised spokesperson, you aren't permitted to comment on Newcrest's behalf.</p> <p>Report the post to Group Communications.</p>  |
| <p>I took a great photo of my teammates on-site with our open pit in the background. Everyone is in full PPE.</p> <p><b>Can I post this on Facebook?</b></p> | <p>Each site has its own rules around photography. Ask your line manager about the rules for your site.</p> <p>You also need to ask your teammates if they're okay with their photo being posted on social media.</p> |

### We do

Interact with Newcrest's official posts by liking, commenting and sharing.

Talk about the parts of work we enjoy on social media. For example, taking part in a fundraising event at work, attending an industry conference or sharing published industry research.

Respect the privacy of people at work, customers, business partners and communities.

Make sure our social media profile and posts are consistent with how we present ourselves at work.

Take care when asking colleagues at work to be 'friends' on Facebook or Instagram.

LinkedIn is a good place for connecting professionally with work colleagues.

Make sure our personal use of social media during work hours doesn't distract us from our job or stop us from delivering our work.

### We don't

Use our Newcrest email address to register on social media platforms for personal use.

Publish or disclose confidential or sensitive company information.

Create our own Newcrest social media accounts.

Respond to questions or negative comments on official Newcrest social media accounts, unless we're authorised.

If we see comments that need a response, we send them to Group Communications.

Speak negatively about our workplace on social media.

Regardless of our privacy settings, our posts can get shared publicly. Even after a post has been deleted, it can be tracked back to the person who posted it. Anonymous and closed group posts can also be tracked back to the person who posted them.



## We promote sustainability

55 → Environment, Social and Governance

58 → Climate Change





## Environment, Social and Governance

Sustainability is a vital component of our company vision to be the Miner of Choice.

It's also key to our purpose of creating a brighter future for people through safe and responsible mining.

### It's our aim to be:

- a safe and sustainable business where everyone goes home safe and healthy every day; and
- trusted by communities because of our environmental and social record.

### Sustainable mining means:

- engaging with and respecting local communities;
- checking for and managing safety, social and environmental impacts; and
- making ethical and transparent strategic business decisions that take into consideration present needs as well as future requirements of neighbouring communities, stakeholders and the company.

Our integrated approach to sustainability can be seen across Newcrest. It starts with the charter of our Board's Safety and Sustainability Committee and our Sustainability Policy. Our Board's Safety and Sustainability Committee oversees the sustainability programs that are driven by our Executive Committee.

### We've also made public commitments to sustainability that align with these industry memberships:

- International Council on Mining and Metals;
- World Gold Council; and
- Minerals Council of Australia.

We have a range of sustainability-related policies. They are about climate change, energy, biodiversity, water stewardship, human rights, Indigenous relations and community relations.

We also set annual business objectives for sustainability to drive a culture of continual improvement in sustainability across our business.

### We focus on four key areas:

- everybody going home safe and healthy every day;
- caring for the environment;
- developing and maintaining strong relationships with our communities and governments; and
- acting ethically and transparently.

From an investor perspective, sustainability can be described as environment, social and governance (ESG). Newcrest can be compared with other companies through ESG indexes such as the Dow Jones Sustainability Index (DJSI).

We take a broad view of sustainability and each year we conduct a materiality assessment from the perspectives of our internal and external stakeholders. This assessment concentrates our efforts on important current and emerging risks and opportunities and guides our public disclosures.

#### Examples of material topics we focus on to achieve our vision includes:

- Improving safety and health.
- Working with our communities.
- Responding to climate change.
- Tailings management.
- Water management.
- Growth and financial sustainability.
- Respecting and protecting human rights.
- Transparent and ethical business.

## Our expectations of our people

#### Whether you're an employee or a contractor:

- understand and follow our sustainability policies; and
- apply the principles of sustainability to your day-to-day activities.

Reduce and mitigate potential impacts to the environment or local communities through:

- carrying out regular risk assessments;
- applying management plans that meet regulatory requirements as a minimum and exceed them where relevant;
- putting in place safeguards to preserve and enhance our reputation as a sustainable company; and
- conducting reviews on the effectiveness of controls.

We also encourage you to identify and implement improvements that will increase sustainability where you work. We talk about and inspire others to continue to improve our sustainability.

We train our people in the principles of sustainability and we encourage sustainable thinking by engaging with our people about sustainability regularly.

### Learn more

- [Corporate Governance Statement](#)
- [Sustainability Policy](#)
- [Climate Change Policy](#)
- [Environmental Policy](#)
- [Annual Sustainability Reports and Annual Reports](#)

### Who to contact for help

Your line manager

Group Manager Sustainability and Social Performance

Head of Environment

General Manager Environment, Sustainability and Social Performance

## In practice

| Scenario   | Response   |
|--|--|
| <p>I injured myself at work but I don't want to report it because it'll hurt my team's good safety record.</p> <p><b>Is this ok?</b></p>   | <p>No. Always report injuries and incidents so we can make sure you get the right medical treatment.</p> <p>We'll also need to understand the cause of your injury so that we can take action to prevent the injury from happening again.</p> <p>We want everyone to go home safe and healthy every day.</p> <p>Improving the safety of our workplace is key to the sustainability of our business.</p>  |
| <p>At my site I feel our consultation with the local community is slowing us down. I think there could be restrictions put on our project.</p> <p>Why does Newcrest place such a high priority on having strong relationships with the community?</p> <p><b>Shouldn't our main goals be productivity and profit?</b></p> | <p>We build long-term relationships based on mutual respect and understanding. This is so we earn the trust and confidence of the communities where we operate.</p> <p>A trusted community relationship is the foundation that allows us to operate. It's key to the sustainability of our business.</p> <p>Disrespecting the community could lead to our customers, suppliers and the governments that regulate us losing trust in us – impacting our licence to operate.</p> |



### We do

Balance economic, social and environmental issues in our business.

Take sustainability seriously. We follow all company policies.

Look for ways to increase our care for the environment as part of our work. We discuss our ideas with our line manager.

Commit to achieving long-term sustainability goals.

Immediately stop work that could contribute to a significant environmental or community incident, such as a spill, and speak up.



### We don't

Disregard any element of sustainability – environmental, social or governance.

Participate in 'green washing'. This is lying to get investors or the community to think that a company is being responsible in its care for the environment – when it's not.

Turn a blind eye if we become aware of a community complaint or concern. Any feedback that we get from the local community needs to be passed onto our line manager.

Focus on short-term outcomes at the expense of long-term sustainability goals.

## Climate Change

We are committed to the sustainable discovery, development and production of gold and copper.

As a responsible miner we must identify, assess and report our responses to challenges resulting from climate change.

We recognise that climate change is one of the most significant challenges facing the world today. We acknowledge the climate change science and support the Paris Agreement goals.

Newcrest has committed to a 30% reduction in greenhouse gas emissions intensity by 2030 as well as a goal of Net Zero Carbon emissions by 2050. We are committed to assessing our options to increase use of renewable energy and low emissions energy technologies.

We include Shadow Carbon Prices in our sensitivity analysis, in the absence of jurisdictional carbon prices. A shadow carbon price provides a hypothetical cost of carbon to each tonne of emitted CO<sub>2</sub>-e. It is used as a method to reveal hidden risks and opportunities throughout our operations and supply chain. It will also support strategic decision making as we consider future capital investments.

We support the Task Force on Climate-related Financial Disclosures (TCFD) Recommendations. Newcrest has taken a phased approach to reporting against the TCFD framework to make our climate-related risks and opportunities more visible and transparent. Supporting the TCFD means increased disclosures through our annual reporting, particularly through our Sustainability Report and our Annual Report.

## Our expectations of our people

To understand Newcrest's Climate Change Policy and support its commitments, including:

- Identifying and managing climate change risks and opportunities.
- Partnering with technology developers as we transition to a low carbon future.
- Partnering with experts and research partnerships to identify potential physical threats from climate change as well as adaptation and mitigation measures.

### Learn more

- [Climate Change Policy](#)
- [Sustainability Policy](#)
- [Annual Sustainability Reports](#)
- [Net Zero Carbon Emissions Program](#)
- [Site Greenhouse Gas Management Plans](#)

### Who to contact for help

Your line manager  
 Group Manager Sustainability and Social Performance  
 Manager Sustainability

## In practice

| Scenario   | Response  |
|--|---|
| <p>I'm interviewing applicants for a job in my team.</p> <p>Our preferred candidate asked me "what's Newcrest's position on climate change?"</p> <p><b>What do I tell her?</b></p>   | <p>This is a great opportunity to talk about our purpose of creating a brighter future for people. This means we prioritise sustainable practices.</p> <p>We recognise that climate change is one of the most significant challenges facing the world today. We acknowledge the climate change science and support the Paris Agreement goals.</p> <p>We have committed to a 30% reduction in greenhouse gas emissions intensity by 2030 as well as a goal of Net Zero Carbon emissions by 2050.</p> |
| <p>One of Newcrest's customers has sent our team a questionnaire as part of their supply chain review. One question is:</p> <p>"Does Newcrest invest in renewable energy and other technologies?"</p> <p><b>How do I answer?</b></p> | <p>Our customers are important external stakeholders and their questions and priorities are important to us.</p> <p>To answer the question, Newcrest is committed to assessing options to increase our use of renewable energy and low emissions energy technologies. We're also committed to working with our suppliers and customers to reduce our Scope 3 emissions.</p>   |



### We do

Use resources efficiently.

Identify opportunities to reduce our energy use and greenhouse gas emissions wherever possible.

Assess new mergers and acquisitions from a climate change impact perspective.

Look for renewable energy opportunities.

Work with our stakeholders to help address the causes and impacts of climate change.



### We don't

Waste resources.

Deny climate science.

Ignore opportunities to recycle as much as possible.

Ignore procedures that protect the environment.

Minimise or downplay the importance of Newcrest's climate initiatives.

Operate in isolation from our stakeholders, including customers and suppliers.

# Key contacts and resources

Let's use this Code of Conduct to keep building a stronger Newcrest.

Living our values means we encourage open and honest discussion about our Code of Conduct and how it applies to our sites, projects and office workplaces.

If you have any questions about our Code of Conduct, talk to your line manager, your local People Manager or your Ethics & Compliance Champion. You can also raise issues of concern through Newcrest's various Speak Out channels.



## Key contacts

### Speak Out channels

We provide a number of channels that you can use to make a Speak Out report, including an online and telephone reporting hotline. The hotline is secure and independently managed by a third party. To make a report via the hotline:

- Complete an online form at [www.newcrest.ethicspoint.com](http://www.newcrest.ethicspoint.com), or
- Use the free call number available in each of the following countries:

| Your country | Phone number to call   |
|--------------|--|
| Australia    | 1800 812 608   |
| PNG          | +675 986 5030  |
| Indonesia    | 001 801 10, then at the prompt in English dial 855 867 7897  |
| Canada       | 1 855 867 7897   |
| USA          | 1 855 867 7897   |
| Fiji         | 00 1 855 867 7897  |
| Chile        | <p><b>Claro Chile – 800:</b> dial 800 225 288, then at the prompt in English dial 855 867 7897</p> <p><b>Telefonica:</b> dial 800 800 288, then at the prompt in English dial 855 867 7897</p> <p><b>Entel (English):</b> dial 800 360 311, then at the prompt in English dial 855 867 7897</p> <p><b>Entel (Spanish):</b> dial 800 360 312, then at the prompt in English dial 855 867 7897</p> |
| Ecuador      | <p><b>For an English operator:</b><br/>dial 1 800 225 528 then at the prompt dial 855 867 7897</p> <p><b>For a Spanish operator:</b><br/>dial 1 999 119 then at the prompt in English dial 855 867 7897</p>  |

### Other channels for making a Speak Out report internally include via:

1. Your line manager.
2. Speak Out app.
3. The Speak Out Protection Officer at [speakoutprotectionofficer@newcrest.com.au](mailto:speakoutprotectionofficer@newcrest.com.au)

or via mail at:

#### Speak Out Protection Officer

Level 8, 600 St Kilda Road  
Melbourne VIC 3004, Australia.

4. A 'Recipient', identified in the Speak Out Policy which includes the Board, ExCo, internal or external auditors.

### Newcrest Ethics & Compliance Champions

You can contact our Ethics & Compliance Champions to ask questions, get support, make a report or guide you how and what channel to use.

Email: [compliance.training@newcrest.com.au](mailto:compliance.training@newcrest.com.au)

### Chief Legal, Risk and Compliance Officer

You can contact our Chief Legal, Risk and Compliance Officer to ask questions, get support or to make a report.

### The Legal Team

You can also contact members of our Corporate Legal Team who can help with legal questions and guide you as to the best avenue for making a report.

### Key resources

Newcrest website: [www.newcrest.com](http://www.newcrest.com)

Links to Newcrest policies:

[www.newcrest.com/about-newcrest/corporate-governance](http://www.newcrest.com/about-newcrest/corporate-governance)

