

## [About the Ethics Solutions Tools](#)

### [Reporting – General](#)

### [Reporting Security & Confidentiality](#)

### [Tips & Best Practices](#)

## About the Ethics Solutions Tool

### What is the Ethics Solutions Tool?

The Ethics Solutions Tool is a comprehensive and confidential reporting tool to assist management and employees to work together to promote a positive work environment based on Newmont's Corporate Values. The tool should help address fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment by acting with integrity, trust and respect.

The Ethics Solutions Tool is administered by a third party, EthicsPoint, in order to ensure the propriety and anonymity of the tool and those using it.

### Why do we need an Ethics Solutions Tool?

- We believe that our employees are our most valued asset. By creating open channels of communication, we can promote a positive work environment and maximize productivity.
- Publicly traded companies are required by law to have an anonymous reporting vehicle to address accounting and auditing fraud directly to the audit committee.
- An effective reporting system will augment our other efforts to foster a culture of integrity, trust and respect based on and ethical decision-making.



## Reporting – General

### May I report using either the Internet or the telephone?

Yes. With the Ethics Solutions Tool, you have the ability to file a confidential, anonymous report via either the telephone or the Internet.

You are also encouraged to have an open dialogue with your supervisor, Human Resources, Legal and/or Internal Audit if you are comfortable doing so.

### What if I do not speak English?

The Ethics Solutions Tool has been translated into Spanish and Bahasa Indonesian. Likewise, if you choose to use the telephone option, interpreters are available in these two languages 24 hours a day.

### What type of situations should I report?

The Ethics Solutions Tool is designed for employees to report any violation of our stated Code of Conduct, or other concern you may have. Likewise, you can nominate co-workers who have demonstrated ethical behavior or raise an anonymous question you would like answered by subject matter experts. You can do all of this anonymously or identify yourself, it is your choice.

### Why should I report?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. Corporate misconduct can threaten the livelihood of the company, the communities in which we operate and ourselves.

### Does management really want me to report?

Yes! In fact, we *need* you to report. You know what is going on in our company - both good and bad. You may have initial knowledge of an activity that may be cause for concern or should be recognized. Your reporting can minimize the potential negative impact on the company and its people. Also, offering positive input may help identify issues that can improve our corporate environment and performance.



### **Where do these reports go? Who can access them?**

Reports are entered directly on the third-party, EthicsPoint, secure server to prevent unauthorized disclosure. EthicsPoint makes these reports available only to specific individuals within the company who are charged with evaluating the report based on the type of violation and location of the incident. Each of the report recipients has had training in keeping these reports confidential and ensuring reports are investigated until the proper resolution is met.

### **Isn't this tool just an example of distrust?**

The Ethics Solutions Tool supports the practice of our Code of Conduct and allows us to assure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate concerns. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

We believe we have chosen an industry leading reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

## **Reporting Security & Confidentiality**

### **Isn't there some way you can tell that I sent this report from my computer (i.e. technologically, you can identify me)?**

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

Nevertheless, if you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website.

### **Can I file a report from home and still remain anonymous?**

A report from any computer (work, home, a neighbor's computer, or any Internet portal) will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Again, EthicsPoint is contractually committed not to pursue a reporter's identity.



### **Is the telephone toll-free hot line confidential and anonymous too?**

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

### **What if I want to be identified with my report?**

There is a section in the report for identifying yourself, if you wish. If you identify yourself, the investigators will take the utmost measures to ensure the matter reported is handled with discretion and professionalism.

## **Tips & Best Practices**

### **I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I report it?**

Our company, through Our Values, chooses to promote ethical behavior. All unethical conduct, at any level, ultimately hurts the company, the communities in which we operate and all employees, including you. You only have to consider what happened in recent corporate scandals to see the disastrous effects that a seemingly harmless lapse in ethics can have on an otherwise healthy company. So if you know of any incidents of misconduct or ethical violations, consider it your duty to yourself and your coworkers to report it.

### **I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?**

File a report or ask a question. EthicsPoint can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

### **What if my boss or other managers are involved in a violation? Won't they get the report?**

The Ethics Solutions Tool and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

### **What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?**



When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique user identifier and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an “anonymous dialogue” where situations are not only identified but can be resolved, no matter how complex. You also can track your report to resolution.

**Are these follow-ups on reports as secure as the first one?**

All EthicsPoint correspondence is confidential and treated with the same level of confidence as the initial report.

**Can I still file a report if I don't have access to the Internet?**

If you don't have access to the internet or are uncomfortable using a computer, you can call the Ethics Solutions Tool which is available 24 hours a day, 365 days a year.