

KALGOORLIE CONSOLIDATED GOLD MINES



OUR CODE OF CONDUCT

AUGUST 2016

An Open Letter to Our Stakeholders

Kalgoorlie Consolidated Gold Mines (KCGM) is the management company of the Kalgoorlie operations for its Joint Venture Owners. KCGM operations include the Fimiston Open Pit, Mt Charlotte Underground Mine and the Fimiston and Gidji Processing Plants.

At KCGM, we are committed to high ethical standards and leading in business responsibility. That responsibility includes a mandate for ethical behaviour by all of our employees and business partners when they are working with us or on our behalf.

Our business responsibility also includes a commitment to the social, environmental, and economic principles of sustainable development, and the ongoing role of sustainability in defining who we are and how we conduct our business. KCGM has a company vision, mission and strategic objectives around which business plans are prepared each year to drive continuous improvement in all areas of our work. *Our Core Values* are the foundation upon which our site culture is built and provide a clear understanding of what is important, valued and acceptable at KCGM.

Our Core Values are:

- (1) Lead in safety, the environment and social responsibility - Set, maintain and continually improve standards by being conscious of the impact of the actions which you and those around you take.
- (2) Behave like an owner - Treat people, equipment, everything as your own, and show that you really care.
- (3) Act with a sense of urgency - Get the job done in a safe, timely manner by prioritizing, using initiative and using available resources effectively.
- (4) Be a team player - Work together to achieve the same goals by respecting, communicating and contributing in an honest, open, supportive and trusting environment.
- (5) Continually improve - Positively evolve and be open to change so that we can remain profitable and competitive.
- (6) Deliver results - Consistently deliver on identified targets and objectives.

Our Core Values are supported by *Our Policies* and *Our Code of Conduct*. *Our Policies* consist of the Health and Safety, Sustainability and Stakeholder Engagement, Operations and Resource Development, Business Integrity, People and Asset Value Protection policies. Both *Our Policies* and *Our Code of Conduct* are integral guides to decision making, actions and behaviours at KCGM. We expect our workforce to incorporate the Values and Code into everything we do on site and in the local community.

The KCGM Core Values, Code of Conduct and Policies outline expected behaviours of all employees and business partners to support the success of our business. We promote and respect fundamental human rights, especially of those who live in our local community and those with whom we work. At KCGM, we start group meetings with a safety discussion. While we focus on physical safety in our operations, our emphasis on ethical standards and business responsibility reflects our commitment to safe business practices and working to ensure that we positively impact all of our stakeholders. The Senior Leadership Team are honoured to lead KCGM and want all of our employees, business partners and valued stakeholders to be proud of how we conduct ourselves in every circumstance.

Sincerely,

Ian Butler
General Manager
AUGUST 2016

Overview of Our Code of Conduct

Our Code of Conduct (**Our Code**) supports *Our Core Values* which clearly set out threshold expectations of behaviour for KCGM employees, officers and directors, and business partners, vendors and contractors when they are working with us or on our behalf. These expectations should be visible at all times to our co-workers, host communities governments, and other individuals and groups whose opinions influence our success. Collectively, these are our stakeholders.

Our Code expresses KCGM's expectations in general terms and does not address every situation that may arise. If you find yourself in a situation that presents a difficult ethical decision and you cannot find the guidance you need here, or in any of the KCGM Policies, Standards or supporting documents, you should ask your manager or a Regional Ethics Advocate.

Questions can also be asked through the Ethics Solutions Tool, which can accept anonymous submissions. Our Core Values, Code and Policies are publicly available through our website, and our Standards and Procedures are available on the *insideKCGM* Intranet or, for business partners, through your KCGM supervisor.

At KCGM, our expectation is that managers will lead by example and set the tone for ethical behaviour for all employees and business partners. We also expect that their doors are open to any questions about ethics and compliance. We aim to ensure that issues and questions can easily be raised and appropriately addressed, and that our employees or business partners get answers.

While Our Code includes a number of sections that relate to specific laws, most of the Code is based on good common sense and sound judgment. If you step back from a situation and ask yourself, "What's the right thing to do?" you will most often arrive at the right solution. It can also be useful to ask yourself: "How would I feel if my decision were featured on the front page of the newspaper?" or "Would I be proud to explain my actions to my co-workers, family members and friends?"

Overview of Our Business Framework



Code of Conduct at KCGM

1. We work safely.

We are committed to an accident and injury free workplace, and to protecting the health and wellbeing of our employees, business partners and visitors. Full and consistent implementation of KCGM's safety standards, systems and procedures is required wherever we operate.

Please refer to our *Health and Safety Policy* for more information on these topics.

2. We promote sustainability.

We adhere to the social, environmental, and economic principles of sustainable development, and the ongoing role of sustainability in defining who we are and how we conduct our business. Our commitment to sustainability includes the promotion and respect of fundamental human rights, especially of those who live in our local community and those with whom we work.

Please refer to our *Sustainability and Stakeholder Engagement Policy* for more information on these topics.

3. We value diversity and work respectfully.

We welcome employees from a wide range of cultures and races and seek to maximise local employment so our workforce reflects our local community.

Please refer to our *People Policy* and our *Sustainability and Stakeholder Engagement Policy* for more information on these topics.

4. We make hiring and promotion decisions fairly.

KCGM is an equal opportunity employer. We recruit, select, place, promote and compensate employees on the basis of their qualifications for the job and do not discriminate against one another on the basis of national origin, race, religion, sex, sexual orientation, disability or age or any other attribute that is protected by law.

Please refer to our *People Policy* for more information on these topics.

5. We work collaboratively.

We work together toward solutions that benefit our business and our stakeholders. Harassment (including all forms of sexual harassment and harassment based upon other legally protected categories), bullying, rude or disrespectful behaviour, lewd comments, and pornography are not allowed, and KCGM prohibits any acts or threats of violence while conducting business on or off KCGM property.

Please refer to our *People Policy* for more information on these topics.

6. We work honestly and in the best interests of KCGM and our Owners.

We are truthful in our work related interactions, whether in explaining a problem to our Supervisor or in reporting results. We will not let gifts or entertainment improperly influence decisions related to KCGM. We avoid situations where KCGM's interests and our own interests conflict, or even appear to be inconsistent. We do not take personal advantage of opportunities that we discover through our work for KCGM, and we do not use KCGM property or information for our own or our family members' or friends' gain. We recognise that our behaviour away from the workplace can impact KCGM and our employment, and we report all legal charges (including traffic violations if we operate a KCGM vehicle) or convictions to our Supervisor and the Human Resources Department in a timely manner.

Please refer to our *Business Integrity Policy* and our *People Policy* for more information on these topics.

7. We follow established standards for operations and resource development.

These standards are designed to ensure we perform in a manner that will deliver value for

all of our stakeholders while honouring our commitments to business responsibility.

Please refer to our *Operations and Resource Development Policy* for more information on these topics.

8. All of our relationships are based on integrity.

Our interactions with our business partners and all government officials and agencies, whether local, regional, or national, must be beyond reproach. We prohibit corruption and only use appropriate and lawful means when we engage with government officials, our business partners and other stakeholders to act for the benefit of KCGM.

Please refer to our *Business Integrity Policy* for more information on this topic.

9. We behave honestly in the marketplace.

We will not trade in the stock of any company based on material information that has not been disclosed to the public, and we will not disclose such information to others so that they may trade based on it.

Please refer to our *Business Integrity Policy* for more information on this topic.

10. We protect the value of our Owner's assets, including physical assets, information and data and our good name and reputation.

We follow applicable security and information technology standards to protect KCGM Our Owner's physical assets and intellectual property from theft, loss, damage, or misuse. We safeguard KCGM's confidential information from unauthorised disclosure, changes or loss, and we uphold the value of KCGM's reputation and good name whenever we represent KCGM.

Please refer to our *Asset and Value Protection Policy* for more information on this topic.

11. We speak up when we see issues or have questions, and cooperate candidly in investigations.

We communicate with our managers, a Regional Ethics Advocate, or we report issues to the Ethics Solution Tool if we have questions or feel that we are being pressured to violate our ethical responsibilities, or see others doing so. We also candidly cooperate in investigations regarding safety, ethics and compliance matters.

Please refer to our *People Policy* for more information on this topic.

12. We support and protect those who speak-up.

No person will be retaliated against in any way for asking questions or voicing concerns about our legal or ethical obligations when acting in good faith.

Please refer to our *People Policy* for more information on this topic.

13. We are accountable for upholding Our Code.

Every employee or business partner engaged on behalf of KCGM is accountable for complying with Our Core Values, Code, Policies, Standards and Procedures, and all applicable laws and applicable regulations in all places where KCGM does business. Failure to live up to Our Code responsibilities may result in disciplinary action, up to and including termination of employment.

Please refer to our *People Policy* for more information on this topic.

14. How our governance works.

This Code reflects our expectations of one another as we work to advance the interests of KCGM and its stakeholders. It is the foundation of our Ethics and Compliance Program and our internal governance, which consists of Policies, Standards, Procedures and other supporting documents.

- a. Health and Safety Policy
- b. Operations and Resource Development Policy
- c. Asset and Value Protection Policy
- d. Business Integrity Policy
- e. People Policy

f. Sustainability and Stakeholder Engagement Policy

KCGM employees can find an electronic version of Our Values, Our Code and Policies on the *insideKCGM* Intranet. Non-employees can find them on the KCGM website at www.superpit.com.au.

15. Resources and contact information.

- a. Regional Ethics Advocates
- b. Corporate Ethics and Compliance Team –
- c. Ethics Solutions Tool:

www.ethicssolutionstool.ethicspoint.com

16. Definitions

KCGM means Kalgoorlie Consolidated Gold Mines Pty Ltd.

Owner means, collectively, Kalgoorlie Lake View Pty Ltd and Barrick (Australia Pacific) Pty Ltd.

Regional Ethics Advocate means the person or persons designated for such role from time to time.

Code Acknowledgement

The Code does not represent, and may not be interpreted as an employment contract or other legally binding agreement between KCGM and any employee or any other person or entity. Similarly, no person or entity may claim to be a third party beneficiary of this Code.

Unless covered by a collective bargaining agreement or specific employment contract or inconsistent with applicable local law, employment with KCGM is at-will, which means that either the employee or KCGM may terminate the employment relationship at any time, with or without cause, justification or explanation to the other. Unless contrary to local law or a collective bargaining agreement, the at-will nature of any KCGM employee's individual employment relationship with KCGM can only be modified by contract through a written agreement signed by both the employee and the General Manager.

Code Acknowledgement

I understand and agree that the statements of policies contained in this Code and other Company materials do not constitute a contractual commitment to continued employment.

I also understand and agree that the Code of Conduct and other KCGM Policies do not constitute a promise of specific treatment in specific circumstances, but are expectations that may be changed by KCGM whenever in its judgment a change is necessary or appropriate.

I have reviewed the Code of Conduct, or, to the extent I have not reviewed it, I accept responsibility for familiarising myself with its contents. I understand that I may discuss with my Supervisor any questions or concerns about the Policies the Code of Conduct contains. Any questions I had regarding this Acknowledgement have been answered to my satisfaction.

Waiver

This Code cannot be waived without appropriate approval. If you encounter a situation that you believe may require waiver of a provision of the Code, raise the issue promptly with your Manager, a Regional Ethics Advocate or through a submission to the Ethics Solutions Tool.