

Newcrest is committed to fostering a culture of trust in an environment that encourages reporting of misconduct and unethical behaviour and providing protection to those who speak out.

This Policy is available on the Newcrest website and intranet and is intended to be accessed by all.

Purpose

We are committed to conducting our business with honesty and integrity in line with Newcrest's values and in compliance with relevant legal and regulatory requirements. We have created this Speak Out Policy to encourage individuals to report any Concerns about Improper Conduct and to ensure protection is provided to those who speak out.

This Policy also states our framework for ensuring that fair and independent investigations of any Concerns raised under this Policy are undertaken consistently and in accordance with relevant Newcrest standards and encourage appropriate responsive action where necessary.

Application

This Policy applies across our operations and activities globally.

This Policy applies to any individual that is, or has been, any of the following:

- (a) an officer or employee of Newcrest;
- (b) a person who supplies goods or services to Newcrest or an employee of that person;
- (c) a director or secretary of Newcrest;
- (d) a director or secretary of a related company of Newcrest; and
- (e) a relative, dependent or spouse of any of the individuals listed in (a) to (d) above,

(collectively referred to as **you**).

What should you speak out about?

You are encouraged to speak out about any misconduct, anything that you believe to be illegal or unethical, any safety issues, or any breach of our Code of Conduct, including:

- dishonest, fraudulent or corrupt activity;
- illegal activity;
- unethical behaviour, breaches of our policies or standards;
- conduct or practices that present a real risk of damage or harm to us, our people or third parties;
- conduct or practices that may cause financial loss to us or damage our reputation;
- harassment, discrimination, victimisation or bullying;
- a breach of any law which may impact our business operations;

- a breach of any Australian tax law or misconduct in relation to our tax affairs (a **Tax Matter**); or
- any other kind of serious impropriety,

(together referred to as **Concerns**).

If you have a personal work-related grievance you may wish to raise it under the *Fair Treatment Procedure* or the *Resolving Workplace Behaviour Complaints Procedure*.

For current employees, we encourage you to speak to your Line Manager in the first instance.

Who should you speak out to?

The Speak Out Service

We understand that in some circumstances you may want to raise a Concern confidentially. If you do, we encourage you to use the Speak Out Service. Using the Speak Out Service is the best way for us to ensure your Concern is dealt with promptly, securely and in accordance with this Policy.

You can access the Speak Out Service and all relevant details including a 24/7 jurisdiction specific confidential telephone line at www.newcrest.ethicspoint.com.

Country	Telephone Number
Australia	• 1800 812 608
Papua New Guinea	• 00 086 1214
Indonesia	• 001 801 10, then at the English prompt dial 855 867 7897
Canada	• 1 855 867 7897
USA	• 1 855 867 7897
Fiji	• 00 1 855 867 7897
Chile	<ul style="list-style-type: none"> • Telemex – 800: dial 800 225 288, then at the English prompt dial 855 867 7897 • Telefonica: dial 800 800 288, then at the English prompt dial 855 867 7897 • Entel (English): dial 800 360 311, then at the English prompt dial 855 867 7897 • Entel (Spanish): dial 800 360 312, then at the English prompt dial 855 867 7897
Ecuador	<ul style="list-style-type: none"> • For an English operator, dial 1 800 225 528 then at the prompt dial 855 867 7897 • For a Spanish operator, dial 1 999 119 then at the English prompt dial 855 867 7897

Other people you can speak out to confidentially

If you would prefer, you can also raise a Concern confidentially to:

- the Speak Out Protection Officer;
- the Group Manager, Legal Governance Compliance;
- any member of the Executive Committee;
- any Board member or the Company Secretary;
- a member of Internal Audit or external auditors conducting an audit of Newcrest; or
- if the Concern is a Tax Matter, you may also raise it with a registered tax agent or BAS agent engaged by Newcrest,

(together referred to as **Designated Recipients**).

To report your Concerns via email please email the Speak Out Protection Officer at speakoutprotectionofficer@newcrest.com.au.

Other

Nothing in this Policy (or any other Newcrest document) prevents you from:

- reporting a Concern, including misconduct or illegal activity to ASIC or APRA;
- reporting a Tax Matter to the Commissioner of Taxation; or
- seeking legal advice on your rights.

How we protect you

We protect everyone that raises any Concerns under this Policy in the following ways.

Confidentiality and anonymity

If you are raising a Concern confidentially to our Speak Out Service or to another person identified above, we will not share your identity **unless**:

- you consent;
- we decide that your Concern should be reported to the Australian Securities & Investment Commission, the Australian Prudential Regulation Authority or the Australian Federal Police on a confidential basis;
- the Concern is raised with a lawyer to obtain legal advice; or
- otherwise required by law.

Where it is reasonably necessary for us to disclose identifying information to be able to investigate a report, we will take all reasonable steps to reduce the risk that you will be identified as a result.

Protection from retaliation

We will not tolerate any reprisals, discrimination, harassment, intimidation or victimization of you and we are committed to protecting you from Detrimental Treatment by anyone who believes or suspects that a report has, may or is proposed to be made.

Detrimental Treatment includes dismissal, injury, demotion, harassment, discrimination, disciplinary action, bias, threats, damage to property, reputation or a person's business or financial position or other unfavorable treatment connected with speaking out.

If you are subjected to Detrimental Treatment as a result of making a report under this Policy, or if you are aware of or suspect another person has been subjected to Detrimental Treatment, you should report it immediately to your Line Manager, Human Resources, Legal or via the Speak Out Service.

Fair treatment

We are committed to treating all persons involved in a Concern fairly, including where the name of a person is raised by someone who is speaking out about a Concern, as appropriate in the circumstances. All investigations undertaken under this Policy will be conducted in accordance with principles of procedural fairness.

Other protections

In addition to the above, under Australian law, you may be entitled to additional legal protections, including:

- protection from civil, criminal or administrative legal action for making the disclosure;
- protection from contractual or other remedies being sought against you on the basis of the disclosure;
- the information you provide may not be admissible in evidence against you in legal proceedings (unless you have provided false information); and
- if you are subject to retaliatory conduct for speaking out, in some circumstances you may be entitled to compensation or another remedy.

Employee training

We will train our officers and employees on their rights and obligations under this Policy. All people listed above who may receive confidential disclosures are also provided with specific training on how to manage and record

Concerns raised under this Policy.

Investigation of Concerns

All Concerns raised will be investigated in accordance with relevant Newcrest standards and procedures.

All disclosed information will be recorded in our Speak Out database and managed in accordance with this Policy. The Speak Out Protection Officer is alerted to Concerns raised under this Policy via the Speak Out Service and will conduct an initial review and allocate the matter for investigation.

In some cases, we may ask you to cooperate in a confidential investigation which will be conducted by a limited number of people on a need-to-know basis. The relevant investigators will depend on the nature and severity of your Concern.

A summary of any investigation, findings and actions taken are recorded in the Speak Out Service database to ensure all Concerns are appropriately monitored and managed.

Reporting

A summary of the number, type and jurisdiction of Concerns raised under this Policy are provided to the Board Audit and Risk Committee (**ARC**) at least quarterly on a 'no names' basis.

The following people will be notified about relevant Concerns and provided with a report on the findings of the Concern raised:

Concerns relating to	Notified and reports provided to
Directors	<ul style="list-style-type: none">Chairman of the BoardIf Concern relates to the Chairman of the Board, to the Chairman of ARC
Members of the Executive Committee	Chairman of the ARC
All other Designated Recipients	Chairman of the ARC
All others	Speak Out Protection Officer and others as directed by the Head of HR.

Remember please speak out – we want to hear your Concerns about our company.

Sandeep Biswas

Chief Executive Officer
Newcrest Mining Limited
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