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Human Rights Standard

Purpose & Objectives

Implementation of this Standard will enable us to respect¹ the human rights of our workforce and communities wherever we do business, manage risks in our supply chain, uphold international human rights standards, make informed decisions to manage risks to people and to our business, and fulfil commitments in our Sustainability and Stakeholder Engagement Policy.

This Standard is designed to complement and enhance the requirements in 's Standards on Indigenous Peoples, Land Acquisition and Involuntary Resettlement, Stakeholder Relationship Management, Cultural Resource Management and Social Baseline and Impact Assessment. It defines the minimum requirements to identify, prevent, mitigate, track and report on how we address risks to human rights associated with our operations. It also defines the minimum requirements to support and promote human rights and to enable remediation when we identify that we have caused or contributed to adverse impacts.

Scope

The scope of this Standard is global. It applies to all directors, officers and employees of Corporation ("NC") or any entity that is controlled or managed by NC (together with NC, "" or the "Company"). In addition, where explicitly stated in an applicable contract, it may apply to 's contingent workers, vendors, contractors, and other types of business partners. It is applicable to all sites and in all phases of the mine life cycle including exploration, design, construction, operation and closure.

Content

1. Planning & Design

1.1 Overview

- 1.1.1 Sites shall respect the human rights of their employees, contractors and the communities in which they operate.
- 1.1.2 Sites shall take a risk based approach to the management of human rights acting in accordance with country regulation, internationally recognized human rights frameworks (including the due diligence process in the UN Guiding Principles on Business and Human Rights) and corporate policies and associated Standards.

1.2 Assessment

- 1.2.1 For new projects or significant changes to existing operations, Sites shall integrate an evaluation of human rights into their assessments (social impact assessments, risk assessments etc.).

¹ According to the UN Guiding Principles on Business and Human Rights, the corporate responsibility to respect human rights, means that business enterprises should act with due diligence to avoid infringing on the rights of others and address adverse impacts with which they are involved

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1.2.2 Sites shall undertake a stand-alone Human Rights Impact Assessment (HRIA) if it is deemed necessary in their operating context².

1.2.3 Assessments shall identify and evaluate actual and potential human rights impacts from: (i) the Site's own activities and; (ii) the Site's business relationships (including relationships with suppliers, security forces and governments). Special attention shall be paid to identify and address the needs of vulnerable and/or marginalized community members who may be disproportionately affected by the Sites' activities.

1.2.4 Assessments (integrated or standalone) shall be conducted by organizations/ individuals with demonstrable human rights expertise and credibility. Stakeholder concerns shall be addressed and documented during the assessment process. Participation shall be designed so that the process is inclusive, accessible, free from manipulation and undertaken in a timely and culturally appropriate manner.

1.3 Systems

1.3.1 Sites shall maintain ongoing processes to identify, integrate and manage changes in human rights risks including through: (i) engagement with external stakeholders, (ii) capturing human rights risks in the risk management system and updating them during regular reviews (at least annually), (iii) capturing human rights related events in 's event management system, and (iv) capturing human rights related complaints and grievances.

1.3.2 Our workforce and external stakeholders, inclusive of affected communities, shall be provided with ongoing opportunities to express their views on potential human rights risks, impacts, and mitigation measures.

2. **Implementation & Management**

2.1 Human Rights Management Plans

2.1.1 Sites or regions (as appropriate) shall form a cross-functional human rights working group which will provide oversight for the implementation of a Human Rights Management Plan. The Human Rights Management Plan will be standalone or incorporate the following areas into existing plans of relevance: (i) the mitigation measures Sites will take to address human rights risks or impacts identified in the assessments, (ii) metrics and/or other measures to track Site's management of human rights risks or impacts, (iii) the function/department responsible and accountable for managing each human rights risk or impact, (iv) the human rights contact point for the region, (v) a tailored human rights training plan (including on the Voluntary Principles on Security and Human Rights), (vi) how complaint/grievance mechanisms will be used to identify trends in human rights complaints that may require changes to Site management systems,

² Further information on when an HRIA may be required is available in guidance which supports this standard. HRIAs may be required where: (i) resettlement will take place, (ii) risk assessments or SIA/ESIAs identify a number of human rights issues which could benefit from a deeper analysis, (iii) sites are facing widespread concerns over a range of human rights, (iv) NGOs or local communities have raised concerns around human rights performance

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processes or activities, (vii) the resources required (time, human and financial) to implement the plan.

2.1.2 Human Rights Management Plans shall be signed off by the most senior site-based position and sites will share their Human Rights Management Plans with the RSVP and corporate External Relations department.

2.1.3 Sites shall undertake activities to support and promote human rights while recognizing these activities do not offset a failure to respect human rights throughout their operations.

2.2 Human Rights Due Diligence on Business Relationships

Standard contract templates shall include clauses that outline 's commitments to human rights consistent with the Universal Declaration of Human Rights and the requirement that be notified if a supplier becomes aware of any human rights issues related to its activities with .

2.2.1 In the event that becomes aware of a human rights issue in its supply chain, shall request that the relevant supplier conduct an investigation and develop an action plan to address the issue. shall notify the supplier that it may be subject to a variety of legal implications associated with such issue, including potential termination of the contract in question.

2.2.2 Sites shall implement processes to mitigate human rights risks throughout the supplier life cycle that include, at a minimum, prequalification, training, auditing and corrective action plans.

2.2.3 Sites shall identify opportunities to reinforce with suppliers 's commitment to respecting labor rights in its supply chain, including freedom of association and collective bargaining, prohibiting all forms of forced, compulsory and child labor and discrimination in employment and occupation.

2.3 Voluntary Principles on Security and Human Rights (VPs)

2.3.1 In relation to interactions with public and private security forces and in accordance with 's Security Performance Standard (NEM-SEC-STA-001), Sites shall act in accordance with the VPs and respect international law principles pertaining to human rights including those outlined in the Universal Declaration of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work.

2.4 Site Based Grievance Mechanisms

2.4.1 In accordance with 's Stakeholder Relationship Management Standard (NEM-SER-STA-016), Sites shall maintain community complaint and grievance mechanisms consistent with the UN Guiding Principles on Business and Human Rights..

2.4.2 Sites shall inform the corporate S&ER team of the actions being taking to address:
(i) a complaint/grievance/incident that is flagged as a human rights issue by the

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complainant or; (ii) a complaint/grievance/incident that has the potential or may be perceived to have a negative impact on human rights.

3. **Performance Monitoring**

3.1 Tracking and Updating

- 3.1.1 Sites shall monitor and evaluate the issues being raised through their complaint mechanisms regularly to identify trends in human rights that may require changes to management systems, processes or activities.
- 3.1.2 In line with 's Social Baseline and Impact Management Standard (NEM-SER-STA-017), assessment processes incorporating human rights will be updated and validated no less than every five years or when risks to human rights significantly change, whichever is more frequent.
- 3.1.3 Human Rights Management Plans shall be updated on an on-going basis as risks and impacts change. Updated plans shall consider: (i) an evaluation of responses to actual and potential human rights impacts; (ii) modifications to systems and processes to improve performance.
- 3.1.4 In line with 's Interactions, Inspections and Audits Standard (NEM-IMS- STA-008), sites shall be audited against this standard to assess performance and ensure compliance with company requirements.

3.2 Communications

- 3.2.1 Sites shall communicate how they are managing human rights issues to appropriate internal and external stakeholders.

Terms

Refer to the S&ER Policies & Standards glossary for definitions.

- Business Relationship
- Complaint
- Grievance
- Human Rights
- Human Rights Impact Assessment (HRIA)
- Impact
- Social Impact Assessment (SIA)
- Environmental Social Impact Assessment (ESIA)
- Stakeholder
- Workforce
- Supplier

Human Rights

References

- Sustainability and Stakeholder Engagement Policy
- Human Rights Guideline (NEM-SER-GDL-003)
- Supplier Risk Management program
- Integrated Management System
- United Nations (1948): Universal Declaration of Human Rights
- United Nations (2011): Guiding Principles on Business and Human Rights
- European Commission, SHIFT, Institute for Human Rights and Business: Oil and Gas Sector Guide on Implementing the UN Guiding Principles on Business and Human Rights
- ICMM (2012): Human Rights in the Mining and Metals Industry: Integrating Human Rights Due Diligence into Corporate Risk Management Processes
- International Business Leader Forum, Global Compact: Human Rights Translated: A Business Reference Guide

Document Control

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