

Barrick Gold Corporation Response to RAID "Executive Summary"

March 23, 2015 — Barrick welcomes the opportunity to clarify certain aspects of RAID’s “Executive Summary.” Acacia Mining plc is an independent company, operating with its own management team and an independent Board of Directors. As such, Acacia operates its own human rights program, conducts its own assessments, and engages in its own analysis and follow-up activities, entirely independent of Barrick. The Executive Summary released by RAID incorrectly suggests that Acacia’s program is part of Barrick’s program, and that Barrick’s annual summary report on its human rights assessments encompasses Acacia-related operations. This is not the case.

As to Barrick, its human rights assessment program was initiated in 2011, and it is an important element of our overall [human rights compliance program](#). The assessments are conducted by an independent third party expert, Avanzar LLC, a highly respected, consulting organization that is widely recognized as a leader in this field. The program involves human rights impact and risk assessments at Barrick’s high and medium risk operations on a rotating basis; higher risk sites, and sites where particular concerns are identified, receive more frequent reviews. An internal report to management is generated to identify key findings and appropriate remedial responses, and enable local management to share relevant information with local stakeholders.

Fund for Peace, a well-regarded civil society organization that works to prevent conflict and human rights abuses, has served as an external and independent advisor to the company since this program’s inception. Their role has included reviewing and editing the assessment tool being used, providing guidance on the assessment plan, reviewing the reports and discussing follow-up priorities. Professor John Ruggie also has provided advice on issues related to the assessments.

The assessment tool used for this process expands on the human rights assessment indicators found in the Danish Institute for Human Rights Compliance Assessments, covers dozens of individual human rights and hundreds of individual indicators, and is far more extensive than any commercial tool currently available. On an annual basis since 2012, Barrick has created a public report on the assessment program, including the processes undertaken, sample materials used, how the results are considered by the company, and an aggregated set of findings. Barrick is one of only a few companies globally that conducts these assessments and publicly reports on them (Nestle is another). Otherwise, companies are either not conducting

such assessments in the first place, or if they are, then they are not providing the kind of detail that Barrick does on these issues or impacts.

Further, Barrick also conducts independent assessments that focus on the Voluntary Principles on Security and Human Rights (VPs). Barrick's annual report on its VPs program is posted on Barrick's [website](#), and Barrick has agreed to make public its annual report to the VPs plenary, containing information consistent with the VPs Reporting Guidelines. Barrick conducts still additional independent audits as part of its membership in the International Council on Mining and Metals (ICMM). The audits are conducted by Bureau Veritas, a leading company in testing and assurance activities. The audits include an assessment of Barrick's alignment with the ICMM's 10 Sustainable Development Principles and 6 Position Statements (which specifically enumerate human rights principles), Barrick's implementation of the VPs, and other areas related to Barrick's human rights program. Bureau Veritas's assurance letter is posted on Barrick's [website](#), and is included in Barrick's annual Responsibility Report. Finally, Barrick also maintains a dedicated internal audit program focusing on functional unit management systems, such as security, community relations, and environment, which may impact human rights.

Between Barrick's independent human rights assessment program and Barrick's public annual report, the independent VPs assessments and Barrick's annual reports, the independent ICMM audits and public assurance letter, and the internal audit program, we are unaware of any company that maintains a more comprehensive human rights assurance program, that relies more extensively on independent external assessors to conduct human rights audits and assessments, or which provides greater transparency and public reporting regarding those assessment activities.

We are glad to provide further information related to our human rights assessments, or any other aspect of our human rights program, but do wish to emphasize that RAID's criticisms of Barrick are plainly and seriously misguided.