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14 November 2022

Dear Ms. Coumans

Response to your letter dated 18 October 2022

Thank you for your letter dated 18 October 2022, with the subject: "*Urgent Request that Barrick Halt Forced Evictions and Carry out Independent Due Diligence on Violence and Human Rights Abuses Associated with Forced Evictions at the North Mara Gold Mine*". In your letter, you refer to a report published by MiningWatch Canada dated October 2022. The report raises serious allegations made against North Mara Gold Mine and Barrick Gold Corporation and we welcome the opportunity to respond.

1. The allegations contained in your letter are incorrect

There have been no forced evictions undertaken by Barrick, or North Mara Gold Mine since Barrick assumed operational control of North Mara from Acacia in September 2019, nor are there forced evictions currently underway.

Following Barrick's acquisition of the minority shareholding of Acacia, we sought to resolve several legacy issues that we inherited, including resettling communities that had been impacted by the operations of North Mara. In 2019, North Mara along with the Government and Chief Valuer developed a land acquisition and compensation plan. Some of the key features of the compensation plan include, but are not limited to, the following:

- **No forced evictions:** The forced eviction or removal of any person from their land, or the use of violence when dealing with any person, is strictly prohibited.
- **Independent valuation process:** All offers of compensation to affected persons are based on an independent valuation process, including valuers that are appointed by the Government of Tanzania.
- **Compensation:** Fair compensation is provided to all affected people based on the outcome of the independent valuation process.
- **Inspections:** The resettlement process led by North Mara is regularly audited and inspected by independent third party organisations to ensure that local laws, OECD Guidelines and international best practices are adhered to.

2. Land speculators at the Komarera Village

Land speculators are people, either from the local communities around the Mine or from other regions in the country, that use various means to illegally develop areas through infrastructure development or crop planting, where a moratorium has been established, forbidding new developments on the land designated by the moratorium.

There is overwhelming evidence that it has been occurring at North Mara, evidenced by, for example, the construction of buildings overnight immediately after a moratorium has been issued. These buildings are often funded by exploitive individuals who fund such actions, who take a large portion of any compensation that may be offered to a landowner or renter. It is a complex issue that we are working diligently to resolve with the assistance and support of the Government of Tanzania.

The issues relating to the Komarera Village are similar for the following reasons:

- a) North Mara's intention to acquire land at Komarera started in 2020, with a moratorium placed by the District Commissioner on 28 May 2020. The Local Government and the District Commissioner conducted mass awareness meetings with all persons that were at risk of being affected by the project, prior to any independent valuation taking place.
- b) The first independent valuation started on 3 June 2020, but was discontinued due to a number of actions by the land speculators. Regrettably, the speculators resorted to violence against the valuers and the valuation process was suspended by the local government in order to protect the safety of the valuers. Aerial images taken at the time can corroborate the land developments which took place after the moratorium was in place.
- c) In late June 2021, over a year after the date of the moratorium, the speculators started to apply pressure on North Mara to commission a new valuation. North Mara also received assurances from the local community that they would enable the valuations to be completed without violence. Accordingly, we invited the Chief Valuer to continue with the valuation process, which was completed on 31 December 2021.
- d) No person was forced to participate in the valuation process without his or her consent, as evidenced by all Project Affected Persons (PAPs) signing the official land valuation forms – Form No 3 of 69. Valuation reports were shared with the affected PAPs from 14 March 2022 and the compensation payments for all eligible PAPs started on 2 April 2022.
- e) For various reasons, 32 PAPs commenced court proceedings against North Mara in August 2022 and obtained a temporary injunction to maintain the status quo which

prevented North Mara from continuing with its planned expansion. In the court action, the PAPs are disputing the quantum of the compensation they have received claiming further amounts of money are payable to them. The 32 PAPs referred to above signed compensation agreements with North Mara on various dates starting in April 2022, pursuant to which they were offered fair compensation according to the independent valuation report. The PAPs have now received their compensation, except a small number of the above 32 PAP's who have refused to pick up their payment. We suspect speculative behavior on the part of these PAPs, but we wish for the matter to be decided by the court.

- f) Neither of Barrick nor North Mara has knowledge of any PAPs being arrested or detained by any security forces who were present to protect the valuers from being attacked by the speculators. We would request any such information to be shared with North Mara so that we can investigate it accordingly.

3. Improvements at North Mara since Barrick took over operational control in 2019

The positive change in the relationships between North Mara and its surrounding communities since September 2019 is tangible on the ground. This is supported by independent assessments and audits, undertaken at North Mara since September 2019, that have publicly commented on the significant improvement, particularly relating to environmental, social and security matters. Whilst we are the first to admit that our work is not complete and we strive for continued improvement, as well as opening our doors for objective scrutiny of our operations, we do not recognize the serious allegations and inflammatory language contained in your letter and report.

We implemented a new grievance mechanism for the benefit of the local community from September 2019, and multiple tools are in place to ensure that community voices are respected and heard by North Mara. For example, a toll-free number and grievance suggestion boxes are available in the 11 villages surrounding North Mara. Any grievances that come to the attention of North Mara are promptly and thoroughly investigated.

In addition, we have invited a number of the local and national NGOs to visit the mine to get a better understanding of what community development initiatives we are investing in as well as to share our practices and policies regarding environmental management and human rights. For example, this includes human rights training that we provide to the local police force on an ongoing basis. We have reiterated with these parties that we want to partner with them to ensure that the community fully benefits from our operations.

4. Conclusions

To conclude, since Barrick took over operational control of North Mara in 2019:

- a) There have been no forced evictions at Komarera.
- b) No person has been physically harmed by any person affiliated with Barrick Gold Corporation or North Mara.
- c) We have and continue to follow the compensation plan agreed to by the Government, Chief valuer and District Commissioner at Komarera.
- d) All PAPs at Komarera have been offered compensation by North Mara based on an independent valuation process. The vast majority of these PAPs have accepted North Mara's offer of compensation.

- e) The relationship between North Mara and the surrounding community has significantly improved, and we have made positive changes to reflect the concerns from the local community that have come to our attention. We have procedures to ensure that all persons affiliated with Barrick Gold Corporation and North Mara comply with our environmental management and human rights policies.
- f) Through the LBMA, the refiner, MMTC-PAMP, appointed a third party consultancy to undertake an Independent Assessment against LBMA RGG and OECD Guidelines. The Independent Assessment concluded that there were additional measurable improvements in the management of the risks at North Mara, including in relation to land issues and the development of a new grievance mechanism. See the Findings on the [MMTC-PAMP website](#).

We appreciate balanced and objective scrutiny of our operations, and we assure you that we will thoroughly investigate any credible claims of wrongdoing made against any person affiliated with Barrick or North Mara. We also hope that you will engage with us prior to publishing any future reports concerning any of Barrick's operations.

Yours sincerely



Mark Bristow

President and CEO, Barrick Gold Corporation