



Our Code of

Conduct

Your handy pocket guide

ENGLISH
EDITION



GOLD FIELDS



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The Code
applies to
me.

WHAT IS EXPECTED OF ME?

Always discuss and declare



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the Code

The general rule of the Gold Fields Group Code of Conduct (the Code) is to **get certain approvals and make certain declarations**. The appropriate people who can assist you with this are listed in the Code.



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the Code

Unsure whether a situation requires approval or disclosure, or what any term or word in the Code means?

Always ask the appropriate person (as outlined in the Code on page 6), the EVP: Group General Counsel or VP:

Group Compliance for help.

Get it in writing



There are a number of situations outlined in the Code, for which you must request approval or disclose in writing in the prescribed register. All the registers are available on the Group Code of Conduct portal on the intranet, or from the Regional VP: Head of Legal or VP: Group Compliance. Getting written acknowledgement or approval is essential and **your responsibility as an employee**. Verbal acknowledgements or approvals won't be recognised if you ever have to face a disciplinary proceeding because of a breach of the Code.

Conflicts of interest



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the Code

Avoid any situation where your personal interests may be, or appear to be, in conflict with those of Gold Fields. Remember to discuss and record any existing or potential conflict with the appropriate person before taking action.



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Working outside of Gold Fields



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the Code

Gold Fields employees may not hold a position outside of the Company or engage in work in their personal capacity for payment – **unless it has been authorised by the appropriate persons and according to the rules in the Code.** The written approval should be captured in the Conflicts of Interest Register.

You are **allowed** to spend limited time on community or charity work (for no remuneration), or as a representative on a related-industry body that benefits Gold Fields, but always speak to an appropriate person for advice if you are unsure. Also get written approval in line with the rules of the Code.

Is a relative of a colleague (son) allowed to be employed in the same team or operational department?



Unless the current employment policies prohibit this, relatives may work in the same operating unit. However, there should be no direct reporting lines between relatives and no relative must be involved in the hiring or supervising of the individual and must in no way affect the terms or conditions of employment, or influence the management of the relative. The individual should **disclose** that their relative is an employee of the operation or department.

Gold Fields information



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the Code

Treat any information about Gold Fields, which hasn't been shared publicly, as confidential. If you are uncertain whether information is confidential or not, or why and how it may be used, treat it as confidential and speak to the appropriate person to get confirmation.

Respect the privacy of all employees and third parties, deal with all private information responsibly, and follow privacy laws in the Region where you are employed or where Gold Fields operates.

Speaking, lecturing or doing a presentation on Gold Fields' affairs, or matters relating to the Company, is not permitted **without prior written consent** from a Regional Exco or Gold Fields Exco member. This also applies once you are no longer employed at Gold Fields.

Laws and other regulations in your Region



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the Code

Ensure that you **comply with all laws, regulations, standards and directives** in the jurisdiction where you are employed or where the Company operates.



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Government officials and political activity



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the Code

Making **political contributions** on behalf of the Company is only allowed with prior Board approval – and only if permitted by local law.

When you have to deal with government or public officials, **act with integrity and respect, and ensure you record the details** of the interaction in the applicable register.

You may take part in political activity, provided it is within the law in your Region, and that you do so in your individual capacity and not as a representative of the Company.



A consultant to Gold Fields who is currently used to assist with government relations recently asked me for a large increase in commission. I suspect the consultant may intend to pass this money onto a local government official. What should I do?



Report your concerns to the VP: Head of Legal and/or EVP: Group General Counsel at once. No such payment should be made until the company has investigated your concerns.

Gifts, meals and entertainment



You are not allowed to offer, give or accept gifts, favours, entertainment, hospitality or business courtesies that may compromise (or seen to compromise) your professionalism, impartiality and integrity to act in Gold Fields' best interests. This also applies to your immediate family.

Cash payments are also not allowed unless approved according to the provisions in the Code.

You may accept novelty or promotional items of a nominal value (the nominal value for each Region is explained in the Code). **But remember to promptly disclose any favour, gift or business courtesy, hospitality or entertainment given or accepted by you or offered to you** – no matter how small, and regardless of the value – to an appropriate person in writing. Also record the details in the Gift, Hospitality and Entertainment Register.



The South Deep operation has elected not to accept or give ANY gifts or business courtesies of any nature or value whatsoever.

A supplier offered me two tickets to a top show in Sydney. They cannot attend themselves but have told me to take someone else. The tickets are worth A\$150 each. May I accept?



This will be deemed a gift. The maximum nominal value you can accept without approval is A\$100, so you will need to get your Regional Exco member or Gold Fields Exco member's approval and complete the Gifts, Hospitality and Entertainment Register. Ensure no tender processes are taking place whether you are involved in the process or not.



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Bribery and corruption



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the Code

You may not solicit, offer, promise, authorise or accept anything of value, including a bribe, kickback or any other improper payment. You may also not use your position to gain personal benefit or an advantage of any kind from a third party, including for **your immediate family**.

Making facilitation payments to government officials is also not allowed (see page 19 of the Code for a definition of 'government official'). Making such a payment to obtain services that Gold Fields is legally entitled to, is a breach of the Code, and potentially a dismissible offence.

If a third party has tried to bribe you, share the incident with the appropriate person and record it in the Bribery Attempts Register. Dealings with this party should be terminated immediately.

Money matters at work



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the Code

Ensure that your **timekeeping, leave, business transactions and share dealings** are always above reproach, and that you report any payment errors without delay.

Speak up!



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the Code

If you become aware of any behaviour that goes against the Code, you are required to report it to an appropriate person or anonymously to the toll-free **Gold Fields Hotline** (details on page 8 of this guide).

Gold Fields **DOES NOT** tolerate **any acts of retaliation or victimisation** against anyone who comes forward in good faith to report any violations of the Code.

Should I report?

I am anxious to use the **Hotline** about a matter I am concerned about. My manager has asked me to do something I know is possibly fraudulent but he is threatening me to act in conflict with the policies and procedures of the company.



It is important that you share what is possibly a serious matter. All calls to the **Hotline** are guaranteed to be confidential so your anonymity is protected. However if anyone were to retaliate against you, you should report this issue promptly. Gold Fields does not tolerate any form of retaliation against people who report violations of the Code, and swift action will be taken against those involved.



CONTACT DETAILS

Hotline telephone numbers

Australia	1800 623 245
Chile	800 914 279
Ghana	0800 10 987
Peru	0800 54760
South Africa	0800 203 711

Hotline email address:

goldfields@tip-off.com

Executive Vice President:

Group General Counsel

T: +27 11 562 9724



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IMPORTANT!

This is a summarised version of the Gold Fields Group Code of Conduct. For full details, always refer to the full document, available on the Group Code of Conduct portal on the intranet, or at www.goldfields.com



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