Salient human rights issues at Gold Fields
Salient issue – health and safety
Occupational incident or exposure leading to physical and/or psychological harm and/or illness

**Causes**
- Negligence
- Poor understanding of link between mining and community health and safety
- Catastrophic infrastructure failure
- Exposure to harmful environment
- Inadequate safety standards and implementation/enforcement
- Poor safety culture
- Non-compliance with legislation, policies, standards and/or procedures

**Preventative controls**
- Policies and procedures – up to date, communicated and understood
- Targeted health education and awareness campaigns
- Compliance to regulatory framework
- Health and safety management system
- Organisational culture interventions
- Disciplinary and grievance procedure
- Behaviour based safety programmes
- Occupational health assessments
- Proper design, certified where applicable
- Health and safety training on relevant risks

**Consequences**
- Injury, disability, loss of life
- Loss of government support
- Illness and incapacitation
- Legal liability (civil and/or criminal)
- Psychological effects
- Increased anti-mining sentiment in communities
- Business interruption
- Low morale
- Fines and sanctions
- Reputational damage
- Scrutiny from regulators
- Difficulty in attracting skills

**Mitigation and damage control**
- Accident investigation and close out of corrective actions
- Provide access to medical care to indigent community members
- Family compensation
- Health care
- Rehabilitation
- Address community concerns/complaints
- Compensation and insurance

**Physical and psychological harm and illness**

**Leading up to the event**

**Considerations for further mitigation**
- Focus on psychological harm (e.g. risks arising from Fly-In, Fly-Out work arrangements)
- Consideration of shared value opportunities, such as safety and wellness training
Salient human rights issues at Gold Fields

Salient issue – water

Loss of water containment

Causes
- Non-compliance with standard procedures
- Poor maintenance of infrastructure
- Extreme rainfall event/flood
- Failure to design and operate for extreme events
- Inadequate infrastructure
- Inadequate water balance model
- Inadequate monitoring process
- Inadequate environmental geochemical understanding
- Water use competition between mining operations and the community is a major issue
- Seepage and discharge of untreated waste water generated by mining operations
- Inadequate awareness and training on environmental policies (water use, access and preservation)

Preventative controls
- Group water guideline
- Group environmental policy statement
- Standard procedures
- Implementation of water management plans
- Fit for purpose design, infrastructure and construction
- Group Head of Water appointed
- Adequately resourced structures
- Integrated ESG guideline
- For projects – comply with international EIA in relation to issues of groundwater (i.e. undertake hydrocensus and baseline studies on surface water quality, water users, groundwater and hydrology for impact assessment and mine-related water infrastructure planning)
- Establish regular surface water monitoring stations in major impact areas/river systems/water sources
- Initiate cost-effective water and sanitation infrastructure projects/water supply options for the community (e.g. rainwater collection tanks, boreholes equipped with solar powered pumps)
- Training to operators
- Automation of pumping systems
- Climate change vulnerability assessments

Power failure
- Extracting water from unauthorised sources
- Affect sources of water unrelated to the operation
- Fires
- No change management process
- Inadequate water quality and water analysis
- Lack of understanding of water catchment
- Theft and sabotage
- Seismicity – failure of infrastructure
- Lack of understanding of the distribution and importance of local water sources to the community
- Human error to operate facilities with risk to impact water quality

Consequences

Impact on people
- Environmental pollution and loss of containment of surface and ground water
- Loss of access to water for agriculture, irrigation and domestic purposes
- Degradation of river system water quality in the form of sedimentation, heavy metal contamination and low pH
- Losses in spring flows
- Impacts on water users’ human rights to livelihood, health and dignity (sanitation) as communities rely extensively on local water sources for potable and domestic purposes (e.g. farming, bathing, laundry, cooking)
- Impact on fauna, flora and aquatic ecology
- Loss of labour source of project workers

Impacts on business
- Loss of licence to operate (social and legal)
- Reputational loss
- Loss of production
- Impact on investor confidence
- Increased scrutiny from stakeholders including NGOs
- Cost of remediation and business interruption
- Impact on suppliers if the operation/project is not continued
- Fines, sanctions and penalties, including shutdown or suspension of operations
- Impact on water resource/resource loss
- Disruption of operations

Mitigation and damage control
- Crisis management plan/emergency procedures and response plans
- Remediation and rehabilitation
- Engagement of authorities, NGOs and investors
- Alternative water supplies to impacted communities
- Insurance and compensation
- Provide response plan to authorities
- Increased monitoring

Loss of containment (Impacts on water quality)

Considerations for further mitigation
- Region/site water management steering committees to be enhanced
- Leverage innovation and technology opportunities
- Implementation/integration of post closure water management plans

Leading up to the event
- Once the event has occurred
Salient human rights issues at Gold Fields

Impact on people

Salient issue – human resources and observance throughout the Group. Gold Fields seeks to protect the right to:

- fair labour practices;
- freedom of movement including the minimisation of involuntary resettlement;
- make political choices and to exercise those rights outside of working hours;
- freedom of expression (subject to considerations of confidentiality and the prohibition of hate speech and incitement to cause harm);
- freedom of conscience, religion, thought, belief, opinion and cultural heritage;
- not be subjected to slavery, servitude, and forced labour;
- not be employed if you are a child;
- not be arbitrarily deprived of property or possessions;
- freely participate in the cultural life of your choice;
- lawful, reasonable and fair action; and
- not be subjected to arbitrary arrest or detention.

Gold Fields supports local legislation and the United Nations Universal Declaration of Human Rights and the Voluntary Principles on Security and Human Rights. Employees of Gold Fields will play a fundamental role in protecting the above mentioned rights by:

- integrating the protection of such rights into everyday practice;
- reacting proactively and adhering to the local legislation and Group’s human rights policy;
- encouraging diversity in accordance with the local legislation and Group policies;
- training of and guidance for all relevant staff, including security staff and contract personnel;
- respecting the cultural heritage of communities surrounding our mining activities; and
- stipulating that suppliers and contractors conduct themselves in accordance with local legislation and this human rights policy.

HUMAN RIGHTS POLICY STATEMENT

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- human dignity;
- not to be subject to any form of unfair discrimination or harassment;
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considerations for further mitigation

■ Training and awareness programmes with employees and leaders with a particular focus on groups that are at risk, e.g. security personnel and those who manage disciplinary grievance processes (HR/legal/line managers). This would extend to suppliers and contractors

■ Human rights reporting categories included in reporting to better track and monitor human rights issues in the grievance process. Trend analysis of potential human rights violations

■ carousel of roles that we may need to manage

■ Leadership awareness at all levels and governance on human rights

Mitigation and damage control

■ Insurance and compensation

■ Focus on salient human rights issues and raising awareness in the business

■ Implement grievance procedures

■ Conduct investigation and implement disciplinary measures as appropriate

Leading up to the event

Potential for harassment, victimisation, bullying

Potential for discrimination/lack of diversity

Lack of cultural sensitivity

Unfair labour practices

Unsafe and unhealthy working environments would impact human rights

Potential substance abuse that requires managing

Potential for domestic/family violence that we may need to manage

Fair treatment (subject to considerations of affirming previously disadvantaged groups)

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Salient issue – resettlement
Land acquisition and economic compensation and resettlement

Causes
- Mining activities in populated areas
- Mergers and acquisitions
- Environmental
- Access and infrastructures
- Influx of communities into mining areas
- Artisanal mining in formal mining areas
- Exploration
- Inadequate consultation

Impact on people
- Societal disturbance/conflict
- Disruption in livelihoods
- Loss of livelihoods
- Cultural heritage issues
- Increased hardship for vulnerable people
- Loss of access to resources/infrastructure

Impacts on business
- Loss of reputation (media, community, shareholder, government)
- Financial loss
- Loss of social licence to operate
- Project delays/stoppages
- Prosecution of executives/legal claims for compensation
- Impact on future mining applications
- Indirect impact on community due to reputational and financial losses incurred by the company
- International condemnation/adverse international media coverage/protracted delays/loss of social licence to operate/senior executives prosecuted

Preventative controls
- Avoidance and where not possible minimise displacement
- Community influx strategy
- ASM strategy
- Comprehensive socio-economic baseline studies
- Stakeholder engagement plan
- Grievance mechanism
- Resettlement framework
- Land acquisition and resettlement action plan (e.g. stakeholder communication, committees to multi-negotiate)
- Livelihood restoration plan
- Negotiating committee and process (e.g. surveys and census)
- Specific Company policy and guidelines and handbook

Environmental, social and human rights impact assessments
- Government engagement and where appropriate, traditional leaders
- Community relations programme
- Compliance with legal requirements
- Initial work in Ghana advised by international expert (thought leader)
- Government compensation rates
- Free prior and informed consent (FPIC) for indigenous peoples’ resettlement
- Identified and special assistance to vulnerable individuals and groups
- Participative and transparent compensation determination
- Compliance auditing

Mitigation and damage control
- Alternative sustainable livelihood strategies
- Ongoing effective engagement
- Monitoring and measuring of impacts
- Compensation and replacement of structures and assets
- Host community procurement and employment
- Respect for local cultural customs, traditions, rights, interests
- Public infrastructure investment
- Grievance mechanism

Considerations for further mitigation
- Human rights impact assessments
- Medium and long-term business planning (include future resettlement issues)
- Learning from expert reviews (Asanko)
- Systems for recording agreement obligations and controls
- Compliance with international good industry practice
- Work with local government to align national and international standards
## Salient human rights issues at Gold Fields

### Salient issue – procurement

#### Human rights breach by supplier

### Causes

<table>
<thead>
<tr>
<th>Re GFL</th>
<th>Re people</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Gold Fields product and/or service specifications</td>
<td>- BSC compilation and/or inadequate management oversight</td>
</tr>
<tr>
<td>- Suppliers’ human rights commitments</td>
<td>- Supplier’s contact person/contract manager’s understanding of its/her company’s approach to human rights</td>
</tr>
<tr>
<td>- Contractors’ human rights commitments (operational allowances, e.g. overtime) (South Africa)</td>
<td>- Inadequate training (Australia)</td>
</tr>
<tr>
<td>- Inadequate contract management/review</td>
<td>- Lack of understanding of relevance to and impact on Gold Fields (Australia)</td>
</tr>
<tr>
<td>- Gold Fields view on Tier 2 suppliers and potential transparency and compliance exposure</td>
<td>- Host community-based supplier understanding of and commitment to human rights (Philippines)</td>
</tr>
<tr>
<td>- Non-compliance consequences/penalties for suppliers (Australia) (reflective in acting as a deterrent)</td>
<td>- Lack of individual understanding regarding the contrary conduct to human rights (Chile)</td>
</tr>
<tr>
<td>- Lack of understanding of supply chain risk (i.e. focus just on supplies, not entire supply chain) (Australia)</td>
<td>- Inadequate training on the possible effects of the supply chain on human rights violations (Peru)</td>
</tr>
<tr>
<td>- Lack of understanding of scope/scale of potential human rights abuses (Australia)</td>
<td>- Disregard of alerts flagging potential human rights violations within a service/purchase order (Peru)</td>
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<tr>
<td>- Multi-national supply chain (Australia)</td>
<td>- - Inadequate monitoring of contractors’ performance (Australia)</td>
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<tr>
<td>- Lack of supply chain transparency (Australia) (South Africa) (re suppliers)</td>
<td>- - Inadequate vendor/contractor screening and risk assessment (Peru)</td>
</tr>
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<td>- Cost pressures (Australia)</td>
<td>- - Unawareness of the real origin of purchased goods (Peru)</td>
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<td>- Programmes and initiatives to maximize procurement from host community-based suppliers (Philippines)</td>
<td>- - Unawareness of current market conditions – excessive price for reduced pricing (Peru)</td>
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<td>- Local content requirements and perceived or real unfairness (Australia)</td>
<td>- - Inadequate monitoring of contractors’ compliance with labour regulations (Peru)</td>
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#### Preventative controls

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<td>- CoC contractor and supplier certification</td>
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<tr>
<td>- Monthly risk screening of suppliers (via Dow Jones)</td>
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<td>- Supplier awareness and development programmes</td>
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<td>- Contract management and robust product/service specifications</td>
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<td>- Procurement processes, i.e. Tender Review Committee, due diligence, etc.</td>
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<td>- Governance and compliance framework</td>
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<td>- Internal screening risk calculator (&quot;SRC&quot;) applied to all suppliers with confirmed risk mitigated screening matches</td>
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<td>- Monthly recertification of active SAP and Dow Jones active suppliers to ensure all active vendors are screened</td>
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<td>- Compliance with local legal requirements (e.g. impeding Australian Modern Slavery Act (Australia)/local content in procurement (Ghana))</td>
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<td>- Involvement with organisations such as the Walk Free Foundation, UNGCC, etc. (Australia)</td>
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#### Consequences

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<td>- Poor pre-evaluation of potential suppliers (Chile)</td>
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<td>- Lack of supervision at suppliers regarding the use of workers in conditions of desperation (massive migrations), and inadequate payments for their services (Chile)</td>
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<td>- Gold Fields makes commitments to maximise employment in the host community in countries where a difference can be made (Chile)</td>
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<td>- Inadequate evaluation of the real effect generated by Gold Fields’ decisions and actions in the host community (Chile)</td>
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#### Leading up to the event

- Continuous involvement in industry collaboration projects re modern slavery programmes and the consequent human rights non-compliance (Peru) |
- Capability-building programme for host community-based suppliers (Philippines) |
- Supplier contract monitoring and supervision (Ghana) |
- Request for updating and monthly review of supplier reports regarding compliance with human rights (Chile) |
- Execute complete and previous social assessments regarding the possible effects that the decisions and works of Gold Fields will cause on the community (Chile) |
- Generate internal awareness campaign for leaders and contract managers so that they distribute the message to their suppliers and contractors (Chile) |
- Training of contractors in most significant risks and prevention of human rights violations (Peru) |
- Addition of clause in purchase orders requesting information on origin of goods (Peru) |

#### Once the event has occurred

- Reorientation, training and counselling (Philippines) |
- Contractually establish indemnification obligation of the contractor towards the persons under his dependence who are affected by non-compliance of human rights related to your activities of contractor (Chile) |

#### Mitigation and damage control

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#### Considerations for further mitigation

- Constant risk and gap analysis and continuous improvement |
- Enhanced due diligence for risk flagged suppliers or suppliers with confirmed screening matches |
- Supplier audits?
- Due diligence Supplier Code of Conduct focusing on procurement requirements, as the Group CoC already covered ethical conduct requirements |
- Fourth party (ultimate parent company) screening? |
- Consider compliance with UK Modern Slavery Act as best practice – issuing modern slavery compliance statement (Australia) |
- Training and ongoing awareness – scope/scale of human rights issues (Australia) |
- Consider implementing tender requirement re human rights awareness and compliance (Australia) |
Salient human rights issues at Gold Fields

Impact on stakeholders of mine closure

**Causes**
- Insufficient or incorrect liability estimate for implementation of mine closure plan
- Insufficient or incorrect resources for implementation of mine closure plan
- Financial provision (environmental reclamation/rehabilitation bond or other) insufficient or incorrect; or the security may not be realised
- Absent, incomplete or incorrect mine closure plan. Regulator does not accept mine closure plan or prescribes opposing or other requirements
- Delayed, failed or ineffective start to implementation of mine closure plan
- Delay, failed or ineffective implementation of progressive rehabilitation
- Changing landscape (e.g. community influx, statutory changes, mining activities)
- Emergence of AMD, contaminated land/soil and/or other issues not previously identified
- Lack of suitable materials for mine closure to meet mine closure prescriptions (such as rock, topsoil etc.)
- Post closure liability not fully understood or planned for

**Preventative controls**
- Group guidance for mine closure plans that include statutory compliance, IOMM requirements, industry good practice, comprehensive coverage of all aspects (i.e. environment, community, social, procurement, human resources, biophysical, indirect activities, human rights, resettlement, etc.), care and maintenance, unscheduled closure and a resourcing and scheduling plan (detailed versus conceptual closure)?
- Compliance assessment of mine closure plans against Group guidance
- Strategy for provision where gaps exist
- Effective portfolio management
- Annual review and update of mine closure plan
- Performance monitoring protocols for completed rehabilitation
- Regular review and update of Group guidance
- Standardised Group guidance for closure cost estimates (scheduled and unscheduled) aligned with SOX and IFRS requirements. Supported by procedure manual and updated COSO controls
- Annual review and update of closure cost estimate (scheduled and unscheduled)
- Assurance and review of closure cost estimate (scheduled and unscheduled)
- Operational and/or budgets to include applicable closure costs including indirect closure costs
- Due diligence framework to include mine closure plan, liability and provision consideration
- Mine closure requirements for exploration and project activities including compliance with statutory requirements for mine closure
- Progressive rehabilitation to be included in life-of-mine (LoM) closure cost and scheduling
- Progressive rehabilitation plans to be developed and included in business plans (one year, detailed) and three-year plans

**Consequences**
- Risk to human rights impact not addressed, but occur and perpetuated, including loss of livelihood, access to water, sanitation, resources, quality of life
- Environmental impacts not addressed, but occur and perpetuated
- Non-compliance to legal and/or other obligations
- National and regional social impacts not addressed, but occur and perpetuated
- Host community social impacts not addressed, but occur and perpetuated
- National and regional economic impacts not addressed, but occur and perpetuated
- Catastrophic failure of infrastructure or landform resulting in death, damage or loss
- Grievances and complaints which impact on ability for, or timing of, relinquishment
- Reputational impact on Company, potential financial impacts, and multi-jurisdictional investment risks
- Financial losses to Company (short term)
- Financial losses to Company (long term) in addressing post closure liabilities
- Regulator does not agree to relinquishment
- Impact on mergers and acquisitions and potential asset value
- Directive, sanction, penalty or fine against Company
- Delayed “walk-away” or completion of mine closure activities

**Leading up to the event**
- Progressive rehabilitation monitoring and evaluation of implementation
- Progressive rehabilitation lessons learnt: document and update
- Co-operative management between Mine Closure lead and mine planning lead to ensure appropriate scheduling and scheduling changes
- Post closure liability (water management) plans developed for all operations
- Pre-feasibility study for post closure liability management (or mitigation) implementation
- Group financial reporting for post closure liability estimate
- Group provision for post closure liability, or strategy for provision
- Social transitioning strategy that considers stakeholder engagement, host community employment and procurement
- Annual review and update of risk assessment and management plan
- Implementation of social transitioning strategy
- Effective stakeholder engagement for mine closure
- Artisanal/mining of “closed” landforms or activities
- Premature, partial or unscheduled mine closure
- Operation enters into care and maintenance
- Mergers and acquisitions do not consider mine closure
- Mining activities

**Once the event has occurred**
- Reactive and emergency management of social, environmental and other impacts
- Emergency response plan
- Protect value with regulator and/or other stakeholders — including partnerships. Robust engagement and relationship
- Reputation management
- Care and maintenance plan
- Appropriate insurances
- Effective portfolio management
- Effective and increased stakeholder engagement
- Portfolio management adjustments
- Legal interventions
- Contingency planning and risk assessments
- Crisis management plan
- Compensation
- Human resources (employee), social and community approach/strategy — response

**Mitigation and damage control**
- Mitigation and damage control
- Preventative controls
- Leading up to the event
- Once the event has occurred
- Mitigation and damage control
- Preventative controls
- Leading up to the event
- Once the event has occurred
Salient issue – public security
Abuse of power by public and private security

Causes
- Political unrest/community unrest due to political, economic, civil or social factors
- Excessive force
- Criminal acts
- Non-compliance to security policy and legislation
- Poor liaison with public and private law enforcement
- Ineffective application of local/international law
- Poor governance
- Underestimation and analysis of risks

Consequences
- Injury and loss of life
- Loss of ability to work
- Trauma
- Right to security and safety compromised
- Investigation/enquiry and disciplinary action
- Loss of right to protest
- Significant reputational damage to the Company
- Legal liability – criminal/civil liability
- Indirect impact on community due to reputational and financial losses incurred by the Company
- Anti-mining sentiment and protests

Preventative controls
- Competent security provider
- Compliance with voluntary principles on security and human rights
- Code of Conduct for security personnel
- Scenario planning
- Deployment of security personnel proportionate to risk profile – periodic review
- Ongoing risk assessments
- Compliance with local regulatory requirements (if any)
- Training and development
- Security personnel vetting process – due diligence on human rights record and ongoing monitoring
- Relationship with public security
- Security industry networking
- Grievance procedures
- Community capacity development
- Robust contractual arrangements with termination provisions for non-compliance
- Engagement and training of security companies on human rights expectations
- Corporate security policies, standards and procedures
- Private security contract management
- Application of international standards and UN guidelines

Leading up to the event
Abuse of power by public and private security

Mitigation and damage control
- Compensation and insurance
- Independent enquiries and investigations (judicial bodies)
- Human Rights Commission (HRC) (not every jurisdiction has one – particularly where risk is greatest. No application of HRC outside of relevant jurisdiction)
- Dismissals and contract terminations
- Crisis management plans
- Removal of security companies
- Grievance procedures – recording of all complaints and thorough and confidential investigation of all credible complaints

Considerations for further mitigation
- Cooperation/coordination with peer companies on complaints of human rights abuse by public and private security providers.