

Number	ICMM Subject Matter	Disclosure Requirements	Compliance	Comments
1	Alignment of the company's sustainability policies to ICMM's 10 Sustainable Development (SD) Principles and any mandatory requirements set out in ICMM Position Statements.	The reporting company should disclose whether its policies, code of conduct etc. are aligned to both the 10 Sustainable Development Principles and the mandatory requirements of the Position Statements		Gold Fields revised its Sustainable Development Policy Statement in 2020, ensuring alignment with the ICMM framework, particularly the 10 Sustainable Development Principles. Alignment in terms of other policies remains unchanged. A statement of alignment to the 10 principles and the mandatory position statements is available on our website, as part of our IAR and GRI reporting.
		Any gaps in the alignment should be clearly identified and explained, ideally alongside a commitment to address any identified gaps within a specific timeframe.		No gaps identified.
		The member company should report within its sustainability report on its own efforts in the delivery of the collective mandatory requirements.		A Statement will be included in the 2020 IAR, GRI and/or sustainability reporting to this effect.
		If, on the basis of its assessment of material risks, a company establishes that it does not need to implement one of ICMM's Position Statements, then this ought to be: - Reported on within the member company's Sustainability report; and - Assessed as an appropriate departure by the assurance provider.		The position statement on Mercury has minimal relevance to Gold Fields as we do not currently produce mercury as a primary by-product of mining or use mercury in the beneficiation process. Gold Fields has included an assessment of this Position Statement.
2	The Company's material SD risks and opportunities based on its own review of the business and the views and expectations of its stakeholders.	The reporting company should at a minimum provide a brief description of the processes in place to identify and prioritise the SD risks and opportunities faced by the business during the reporting period, and the outcome of these processes i.e. its list of material issues.		Disclosure is provided in the 2020 IAR, the 2020 Climate Change Report, 2020 Report to Stakeholders, GRI and SPR sustainability reporting on our website: 1) Standard risk assessment process that is conducted quarterly by the Group Head of Risk with all the regions and at a Group level (to consolidate the key risks). 2) Group Sustainable Development Department annually reviews global and SA based risk reports (including the World Economic Forum, Deloitte, PWC and EY). The outcome of this process is used to check the relevance of our group strategy. 3) 2020 IAR Materiality Assessment, which has increased diversity in topics for the basis of the assessment, and more importantly, presented material topics from two different perspectives (as two axes) i.e. material to Gold Fields and material to stakeholders. 4) The 2020 Climate Change Report which specifically deals with Gold Fields Climate Change related risks and opportunities and is aligned with the recommendations of the Task Force on Climate-related Financial Disclosure (TCFD). 5) The 2020 Report to Stakeholders which also deals with Gold Fields social-related risks and opportunities (e.g. Stakeholder Risks section of the Report).
		In its sustainability report, a member company needs to disclose its process for identifying and prioritising its material SD risks and opportunities and how it has addressed the principles of completeness and materiality defined in the G3.1 Guidelines/AA100AS. It must also report on what it considers to be its most material SD risks and opportunities as identified through this process.		Disclosure is provided in the 2020 IAR, the 2020 Climate Change Report, 2020 Report to Stakeholders, GRI and SPR sustainability reporting on our website: The 2020 Climate Change Report which specifically deals with Gold Fields Climate Change related risks and opportunities and is aligned with the recommendations of the Task Force on Climate-related Financial Disclosure (TCFD). The 2020 Report to Stakeholders which also deals with Gold Fields social-related risks and opportunities (e.g. Stakeholder Risks section of the Report).
3	The existence and status of implementation of systems and approaches that the company is using to manage each (or a selection) of the identified material SD risks and opportunities.	The reporting company should provide a brief description of the systems and approaches the company is using to manage each (or a selection) of the identified material risks and a brief description of the status of implementation of these.		See above. Disclosure is provided in the 2020 IAR, the 2020 Climate Change Report, 2020 Report to Stakeholders, GRI and SPR sustainability reporting on our website: The 2020 Climate Change Report which specifically deals with Gold Fields Climate Change related risks and opportunities and is aligned with the recommendations of the Task Force on Climate-related Financial Disclosure (TCFD).
		It is suggested that the member company has in place and discloses within its sustainability report its approach for selecting the material risks and opportunities (and related systems and approaches) to be assured.		The 2020 Report to Stakeholders which also deals with Gold Fields social-related risks and opportunities (e.g. Stakeholder Risks section of the Report).
4	The company's reported performance during the given reporting period for each (or a selection) of the identified material SD risks and opportunities.	The reporting company should report on the performance information (e.g. key performance indicators for the reporting period, progress against targets, etc.) for the identified material risks and opportunities.		See above. Disclosure is provided in the 2020 IAR, the 2020 Climate Change Report, 2020 Report to Stakeholders, GRI and SPR sustainability reporting on our website: The 2020 Climate Change Report which specifically deals with Gold Fields Climate Change related risks and opportunities and is aligned with the recommendations of the Task Force on Climate-related Financial Disclosure (TCFD).
		The definitions of any quantitative or qualitative performance measures need to be made publicly available (e.g. in the SD Report, cross-referenced to the company website or guidance such as the WBCSD GHG Reporting Protocol).		The 2020 Report to Stakeholders which also deals with Gold Fields social-related risks and opportunities (e.g. Stakeholder Risks section of the Report).
5	The company's self-declared adheres to the GRI G4 Sustainability Reporting Guidelines and GRI G4 Mining & Metals Sector disclosure.  The ICMM website states the requirement of ICMM members in relation to GRI G4 reporting: <a href="https://www.icmm.com/en-gb/members/member-reporting-and-performance">https://www.icmm.com/en-gb/members/member-reporting-and-performance</a>	The reporting company should meet the minimum requirements to obtain a core level of application of the GRI G4 guidelines and the relevant sector supplement.		Gold Fields reports against the GRI Standards and relevant sector supplement and meets the requirements for a core level of application.

Key	
	Evidence lacking
	Partially compliant
	Fully compliant
	Not applicable

**Principle 1: Ethical Business**

**Apply ethical business practices and sound systems of corporate governance and transparency to support sustainable development**



**Associated Gold Fields Policy Statement:**

Anti-Bribery and Corruption policy  
Gold Fields Code of Conduct

	In relation to corporate vision/policies	Compliance	Comments
1	Develop and implement company statements of ethical business principles, and practices that management is committed to enforcing.		Gold Fields Code of Conduct. Compliance with the Code of Conduct is required by all employees and contractors.
2	Implement policies and practices that seek to prevent bribery and corruption.		Code of Conduct; "Cash payments, discounts or vouchers, no matter how small, must not be accepted under any circumstances from any current or potential supplier, advisor, customer, competitor or business associate of Gold Fields." Compliance with the Code of Conduct is required by all employees and contractors.
3	Comply with or exceed the requirements of host-country laws and regulations.		Gold Fields' commitment to complying with all relevant laws and regulations is clearly stipulated in all our group policies. In addition our operations are ISO 14001 (2015) and OHSAS 18001/ISO 45001 certified. Our newest operation, Gruyere, achieved ISO 14001(2015) and ISO 45001 during 2020.
4	Partner with governments, industry and other stakeholders to achieve appropriate and effective public policy, laws, regulations and procedures that facilitate the mining, minerals and metals sector's contribution to sustainable development within national sustainable development strategies.		<p>We aim to achieve this through driving inclusive stakeholder agreement: Approved stakeholder relationship and engagement policy to ensure that stakeholder engagement allows for collaborative and informed decision making. Transparent reporting so stakeholder groups can make informed assessments of Gold Fields' ability to deliver sustainable value. Ongoing evolution of inclusive stakeholder engagement and relationship building to balance the interests, needs and expectations of stakeholders with the best interests of the Company. We ensure regulatory compliance and sound governance with all relevant laws, regulations, industry guidelines and other initiatives, where we commit to doing so: Compliance with all relevant laws and regulations, and the highest levels of corporate governance. Reviews corporate governance systems and frameworks to align these with increasingly stringent regulatory standards.</p> <p>We foster environmental stewardship and managing impact on communities through: Alignment with good corporate citizenship, assessment and speedy response to any negative impacts operations may have on communities and the environment, and through the SET Committee, which focuses on, among others, impact on communities, while the SHSD Committee deals with, inter alia, issues of environmental stewardship</p>

Key	
	Evidence lacking
	Partially compliant
	Fully compliant
	Not applicable

**Principle 2: Decision Making**

**Integrate sustainable development in corporate strategy and decision-making processes**



**Associated Gold Fields Policy Statement:**  
Sustainable Development Policy Statement

In relation to corporate vision/policies	Compliance	Comments
1 Integrate sustainable development principles into company policies and practices.		The meaning of sustainable development is set out in our strategy. Group SD policies and Group Management Guidelines aligned to the ICMM 10 principles ( Relations & Stakeholder Engagement, Water Stewardship, Biodiversity, Mine Closure, Energy and Carbon Management, Climate Change, Tailings Managemene Peoples) and give effect to the implementation of this strategy. All the polices are Board approved and the guidelines are Exco approved and have been rolle regions. Gold Fields revised and updated its Sustainable Development Policy Statement in 2020, ensuring alignment with the ICMM sustainable development principl continued relevance and improvements for the operations.
2 Plan, design, operate and close operations in a manner that enhances sustainable development.		Gold Fields has developed policies and Group Management Guidelines (Community Relations & Stakeholder Engagement, Water, Biodiversity, Mine Closure, Carbon Management, Climate Change) . In addition there is a Sustainable Development Governance Framework, which includes the following: Governance S Regional Procedures, Sustainability Standards, Tools, metrics and analyses, Certificates and Systems.
3 Implement good practice and innovate to improve social, environmental and economic performance while also enhancing shareholder value.		Our public commitment to being the global leader in sustainable gold mining underpins this commitment. Our policy statements and guidelines set the busin expectations and provide guidance to operations on how to practically achieve this commitment.
4 Encourage customers, business partners and suppliers of goods and services to adopt principles and practices that are comparable to our own.		Fostering dialogue with our stakeholders is a commitment undertaken and encouraged through our policies such as our Human Rights Policy and Anti Briber Corruption (ABC) Policy. Gold Fields strives to ensure that at all times all employees' and contractors' human rights are protected. To achieve high standards areas we track and report potential human rights violations through a global review of current interventions which includes training of the Security personne guidelines we have in place. Controls have been implemented in the supply chain management process to enhance the proactive due diligence process wher suppliers and contractors. For example in Gold Fields Australia, a strategic sourcing and contracts policy and procedure dictates detailed tender and contract performance adjudication and assessment requirements which is done via weighted prioritization assessment of commercial and non-commercial criteria e.g environment, human resources, human rights, quality, compliance, experience and credential verifications and checks. A Request for Award (RFA) approval p followed together with an added contract risk assessment and mitigation checklist. In addition for all site services and contractors additional site based com verification gets completed in line with mine site policies and procedures, before vendors are engaged for work. South Africa follows a similar process for ma works within the framework of a Tender Review Committee where contracts are awarded and renewed.
5 Provide sustainable development training to ensure adequate competency at all levels among our own employees and those of contractors.		Training of all people working for and on behalf of the company is a commitment in our SD polices. In 2020 we continued with training across the group in ur and Courageous Safety Leadership.
6 Support public policies and practices that foster open and competitive markets.		Through ICMM and membership of national mining associations we support public policies and practices that foster competitive markets. Externally, what su means for Gold Fields is communicated in our policies, integrated report and in various external platforms and speaking engagements.

Key	
	Evidence lacking
	Partially compliant
	Fully compliant
	Not applicable

**Principle 3: Human Rights**

**Respect human rights and the interests, cultures, customs and values of employees and communities affected by our activities.**

**Associated Gold Fields Policy Statement:**

- Human Rights
- Code of Conduct
- Anti-bribery and Corruption
- Remuneration Policy
- Community
- Sustainable Development
- Stakeholder Relationship and Engagement
- Group Diversity
- Group Harassment
- Group Sexual Harassment



In relation to corporate vision/policies	Compliance	Comments
1 Ensure fair remuneration and work conditions for all employees and never use forced, compulsory or child labour.		Gold Fields' Remuneration Policy and Philosophy is supported by sound remuneration management and governance principles promoted across all operations and overseen by independent sub-committee of the Board of Directors. Gold Fields' policy is to reward its people fairly and consistently according to their role and their individual contribution Company and its performance. Gold Fields further requires its employees, officers and directors alike to adhere to and be bound by the Code of Conduct and to uphold the sta the Code, which is aligned with the UNGC 10 Principles.
2 Engage constructively with employees on matters of mutual concern.		Gold Fields people strategy is reflected in our Group 2020 scorecard objective titled Internal Business Processes: Improve Organisational Culture and reported in the 2019 and Integrated Annual Reports.
3 Implement policies and practices designed to eliminate harassment and unfair discrimination in all our activities.		Gold Fields' Human Rights, Diversity, Harassment and Sexual Harassment policies aim to achieve these objectives. The implementation of these policies is an indication of Gold commitment to driving diversity in its workforce and maintaining an environment that is free from any form of harassment. In 2019 the Board approved the Diversity and Inclu Strategy to promote workforce diversity and inclusion in a sustainable manner over a five year period. Our approach to diversity and inclusion, and the metrics we track, is prc our website. We abide by the principles of the International Labour Organisation and jurisdictional legislation. Our approach to employment considers, but is not limited to tra monitoring and creating awareness around harassment and sexual harassment.
4 Implement, based on risk, a human rights and security approach consistent with the Voluntary Principles on Security and Human Rights.		Gold Fields' commits to supporting the Voluntary Principles on Security and Human Rights (VPSHR) in its Human Rights policy. The policy also commits to training and guidance relevant staff, including security staff, and contract personnel. In 2017, an independent expert carried out a risk assessment and gap analysis of compliance to the VPSHR in Gh and South Africa. During 2018 sites worked to progress alignment with the VPSHR as disclosed in our 2020 IAR and GRI Content Index Report. Internal monitoring of alignment information sharing across regions continues. Regions report on security and human rights risks in their quarterly Social, Ethics and Transformation Committee reports.
5 Avoid the involuntary physical or economic displacement of families and communities. Where this is not possible apply the mitigation hierarchy and implement actions or remedies that address residual adverse effects to restore or improve livelihoods and standards of living of displaced people.		Gold Fields' Human Rights and Community policies commit to minimizing involuntary resettlement and where this is unavoidable to fair compensation. Practical guidance on tl achievement of these commitments is provided in Gold Fields Community Relations and Stakeholder Engagement Guideline and Handbook which provide detail on nine stand: are guided by ICMM and United Nations Global Compact. In particular, Standard 6: Deliver good practice resettlement is aligned with the IFC principles for involuntary resettle Involuntary resettlement has previously been undertaken at our mines in Ghana and is disclosed in our 2020 IAR and GRI Content Index Report. The Region reports on resettle human rights risks in their quarterly reports to the Social, Ethics and Transformation Committee.
6 Respect the culture, customs and heritage of local communities, including Indigenous Peoples. Work to obtain consent of surrounding communities, including Indigenous Peoples where they are likely to experience significant adverse impacts.		Gold Fields' Human Rights, Sustainable Development, Stakeholder Relationship and Engagement, and Community policies protect the right to cultural heritage; respect the rigl interests, culture and natural resources of host communities and Indigenous Peoples; and require Gold Fields to work to obtain consent of Indigenous Peoples where significar impacts are likely from our activities. Practical guidance on the achievement of these commitments is provided in Gold Fields Community Relations and Stakeholder Engageme Guideline and Handbook which provide detail on nine standards that are guided by ICMM and United Nations Global Compact. In particular, Standard 7: Respect the rights an of Indigenous Peoples is aligned with IFC Performance Standard 7 and ILO Article 169 and supports culturally appropriate engagement and the formal agreements. Indigenous relations are relevant at all of our mines in Australia and are disclosed in our 2020 IAR and Report to Stakeholders. Our Indigenous Peoples strategy in Australia is aligned to Gi and Reconciliation Australia's guidance. Implementation of a Reconciliation Australia endorsed Reflect Reconciliation Action Plan (RAP) commenced in early 2020 with a Regior Steering Committee initiated, chaired by the Executive Vice President of Australia. The Regions report on Indigenous Peoples engagement and cultural heritage issues in their reports to the Social, Ethics and Transformation (SET) Committee. Following the Juukan Gorge incident we undertook an internal review of our Indigenous Peoples and cultura risks and safeguards and reported these and actions we are taking to the SET Committee.

Key	
	Evidence lacking
	Partially compliant
	Fully compliant
	Not applicable

**Principle 4: Risk Management**

**Implement effective risk-management strategies and systems based on sound science and which account for stakeholder perceptions of risks**



**Associated Gold Fields Policy Statement:**  
Risk Management Policy

	In relation to corporate vision/policies	Compliance	Comments
1	Consult with interested and affected parties to identify, assess and manage all significant social, health, safety, environmental and economic impacts associated with our activities.		A 2019 Group Scorecard objective was to increase stakeholder engagement with key community, government and investor stakeholders. The Group External Inte Commitment Register (EICR) system, developed in 2016 to record and report engagements with government and public official entities, has been extended to re report engagement with other defined stakeholders, following the amendments to the Stakeholder Relationship and Engagement Policy. Overall stakeholder eng increased by 14% during 2019. Furthermore, our 2020 Scorecard Objective included the development and / or implementation of Community Actions Plans, and Action Plans as part of engaging and improving our reputation with Stakeholders. Material sustainability issues are assessed and prioritised according to the GRI Standards, and stakeholder interviews conducted to determine material topics for Fields and our Stakeholders (Materiality Assessment 2020 IAR and our website). Stakeholder engagement is undertaken during all phases of the life of mine wher impacts are identified and on an ongoing basis during operations. All operations have Grievance Mechanisms in place, against which they report on a quarterly bi
2	Regularly review and update risk-management systems.		Key risks – and mitigating actions – are identified using an Enterprise-wide Risk Management (ERM) process. The risks and mitigation actions are periodically revi adjusted when required, and reported periodically at relevant levels and structures in the organisation. In addition, a Group-wide crisis management plan is in pl; regularly reviewed and updated, to manage emergencies at a regional, operational and group level. Gold Fields uses a Critical Control Management approach anc developed BowTie analyses for our Material Unwanted Events (MUEs).  Gold Fields' Group ERM Guideline was updated to include Business Continuity Planning in 2020. Gold Fields updated our Combined Assurance Guideline to refle requirements of the King IV Code on Corporate Governance, also in 2020. The purpose of combined assurance is to effectively co-ordinate the efforts of the boar management, internal and external assurance providers for increased collaboration in evaluating the adequacy and effectiveness of controls or mitigating strateg to lower the level of risk. A shared and more holistic view of the organisation's risk profile is developed through the process. Combined assurance also aims to op assurance coverage on potential risks affecting Gold Fields.  Gold Fields updates the Risk Management/Combined Assurance Plan annually to ensure that management takes appropriate levels of risk in pursuit of the compi strategic objectives by staying within the tolerance levels set for them by the Risk Committee. Tolerance levels are approved by the Risk Committee on an annual are aligned with the Group scorecard.
3	Inform any parties potentially affected by significant risks from operations and spell out the measures that will be taken to manage such risks effectively.		Refer above. Each of our operations has extensive stakeholder engagement processes that are both formal and informal. During these engagements we provide updates on ke operational, governance and sustainability issues and highlight the potential risks to stakeholders.
4	Develop, maintain and test effective emergency response procedures in collaboration with potentially affected parties.		A Group-wide crisis management plan is in place to manage emergencies at a regional, operational and group level. It was revised and updated in 2020. Each ope emergency preparedness and response procedures in place. These are updated on a regular basis.

Key	
	Evidence lacking
	Partially compliant
	Fully compliant
	Not applicable

**Principle 5: Health and Safety**

**Pursue continual improvement in health and safety performance with the ultimate goal of zero harm**



**Associated Gold Fields Policy Statement:**

Occupational Health and Safety Policy Statement

In relation to corporate vision/policies	Compliance	Comments
<p><b>1</b> Implement a management system focused on continual improvement of the health and safety of employees, contractors and people in the communities where we operate.</p>		<p>All Gold Fields operations are OHSAS 18001 or ISO 45001 certified. Gruyere achieved ISO 45001 certification and Tarkwa and Damang converted their OHSAS 18001 certifications to ISO 45001 during 2020. A group Safety strategy has been agreed with all regions in 2018 consisting of 3 pillars, covering Safety leadership, Safe behaviour and Safety systems. This strategy goes beyond a management system approach in ensuring that a culture conducive to safe outcomes is achieved that will support the ongoing maintenance of appropriate systems. In 2020 Gold Fields continued the roll-out of our Courageous Safety Leadership and Vital Behaviours programmes.</p>
<p><b>2</b> Take all practical and reasonable measures to eliminate workplace fatalities, injuries and diseases among employees and contractors.</p>		<p>Our principal value is 'if we cannot mine safely we will not mine'. Group, regional and operational safety performance targets are set annually and progress reported to the Board and Safety, Health &amp; Sustainable Development Board Committee. A Safety Leadership Forum with group, regional and operational representatives meets quarterly. The ICMM Critical Control Management approach was introduced in 2017 to provide further rigour to efforts to eliminate injuries. A new Group Safety Strategy was launched in 2018, led by Stuart Mathews, EVP Australia Region. The strategy's pillars are: Safety leadership, Safe behaviour and Safety systems. In 2020 Gold Fields continued roll-out of our Courageous Safety Leadership and Vital Behaviours programmes. Leading performance KPIs are increasingly being used to promote safe behaviours through the implementation of an HSE scorecard which has been integrated into all regional scorecards in 2020.</p>
<p><b>3</b> Provide all employees with health and safety training, and require employees of contractors to undergo the same training.</p>		<p>Everyone working for and on behalf of Gold Fields undergoes rigorous induction programmes at various intervals or as required. Continuous training programmes are designed and implemented at our operations as part of our certified management systems. Contractors form part of the Gold Fields' workforce and are therefore subject to the same requirements as Gold Fields' employees. The CSL program includes contractors</p>
<p><b>4</b> Implement regular health surveillance and risk-based monitoring of employees. Rehabilitate and reintegrate employees into operations following illness or injury, where feasible.</p>		<p>Our operations have procedures on rehabilitation and reintegration of employees into operations following illness or injury. Health surveillance programmes are in place at all operations. Risk based monitoring of employees takes place, and the results are reported to SHSD Board Committee on a quarterly basis. Our approach to health management has been bolstered with a group workshop held in 2019 which has resulted in the development of a group guideline on occupational health that is scheduled to be issued for use in 2021. This guideline will ensure a consistent approach across all regions and provide the foundation for greater collaboration and learning.</p>

Key	
	Evidence lacking
	Partially compliant
	Fully compliant
	Not applicable

**Principle 6: Environmental Performance**

**Pursue continual improvement in environmental performance issues, such as water stewardship, energy use and climate change**



**Associated Gold Fields Policy Statement:**

Environmental Policy Statement

Climate Change Policy Statement

Water Stewardship Policy Statement

In relation to corporate vision/policies		Compliance	Comments
1	Assess positive and negative, direct and indirect, and cumulative environmental impacts of new projects – from exploration to closure.		Gold Fields requires considerations of sustainability aspects in Environmental and Social Impact Assessments (ESIAs) which are conducted on all new projects. Environmental Management Programmes (EMPs) are then developed after the EIA has been approved stating how the project will comply with the conditions of the environmental authorisation. Gold Fields have developed standards for investment projects for Concept, PreFeasibility and Feasibility Studies, which include sustainability requirements for environmental and water stewardship, climate and energy, mine closure, tailings management, social and community.
2	Implement an environmental management system of continual improvement to review, prevent, mitigate or ameliorate adverse environmental impacts.		All Gold Fields operations are ISO 14001 (2015) certified. In 2020, our newest operation, Gruyere, achieved ISO 14001 certification. The 2020 Climate Change Report which specifically deals with Gold Fields climate change related matters and is aligned with the recommendations of the Task Force on Climate-related Financial Disclosure (TCFD).
3	Rehabilitate land disturbed or occupied by operations in accordance with appropriate post-mining land uses.		All operations have Closure Plans which are updated regularly. Our mines undertake progressive rehabilitation in line with the latest Closure Plan requirements. All operations prepare 1 year and 3 year Progressive Rehabilitation Plans, against which their performance is monitored in 2019 and 2020 through Group and / or Balance Scorecard KPIs. Progressive Rehabilitation Plans are aligned with their Mine Closure Plans, in which end land use is discussed.
4	Provide for safe storage and disposal of residual wastes and process residues.		The most significant output materials of Gold Fields operations are tailings, waste rock, chemical waste and hydrocarbon waste, all of which are authorised and responsibly managed. All TSFs and associated pipeline and pumping infrastructure are subject to ISO 14001 certification, external tailings audits, as well as regular inspection and formal annual reporting. TSFs are also subject to Group-wide inspection by independent experts at least once every three years - or more frequently where required by local circumstances or regulations. Gold Fields have achieved compliance to the ICMM Tailings Governance Position Statement. Other hazardous waste is disposed of at authorised facilities or landfill sites. 60% of waste (non mineralised, hazardous and non-hazardous) generated at Gold Fields was recycled in 2020 (compared with 50% in 2019).
5	Design and plan adequate resources to meet the closure requirements of all operations.		All Gold Fields operations have Closure Plans and Closure Cost Estimates (liabilities) (CCEs) in place. The annual CCEs are assured every year by an independent external party of international standing. In addition, the Closure Plans are updated by external parties every two years and the CCEs are reviewed by independent external technical experts every two years as well. Gold Fields have introduced additional guidance for the development of CCEs.

Key	
	Evidence lacking
	Partially compliant
	Fully compliant
	Not applicable

## Principle 7: Conservation of Biodiversity

### Contribute to the conservation of biodiversity and integrated approaches to land-use planning



#### Associated Gold Fields Policy Statement:

Environmental Policy Statement

	In relation to corporate vision/policies	Compliance	Comments
1	Respect legally designated protected areas.		<p>Gold Fields has a strong commitment to biodiversity and protected areas. We are aligned with the ICMM Position Statement for Mining and Protected Areas. Our commitment is contained in the Environmental Policy (revised in February 2021), signed off by the CEO and supported through our Integrated Mine Closure Guideline and Biodiversity Guideline, which was updated in 2019.</p> <p>Gold Fields publically confirm (see 2020 IAR) our commitment to:                      Neither mining nor exploring in World Heritage sites, and designing and operating our mines in a manner which does not compromise the biodiversity values of any protected area.                      Assess and address risks and impacts to biodiversity and ecosystem services by implementing the mitigation hierarchy; and                      Achieving no net loss of biodiversity for all new projects or major expansions on existing sites.</p>
2	Disseminate scientific data on and promote practices and experiences in biodiversity assessment and management.		<p>2020 IAR for material data and GRI Report and SPR Data on the website.</p> <p>Our commitment to biodiversity is in evidence at our Salares Norte project in Chile's Atacama desert, where construction commenced during 2020. We are working closely with the regulator and environmental experts to ensure the protection of a local population of endangered Short-tailed Chinchillas (<i>Chinchilla chinchilla</i>). We are doing so by establishing conservation areas outside the mining area, declaring no-go zones where we cannot operate and relocating the chinchillas where their habitat may overlap with future mining areas. At the same time, we are using tools, such as camera traps and tags, to enhance baseline information and scientific knowledge of the chinchilla, which are a protected species in Chile.</p>
3	Support the development and implementation of scientifically sound, inclusive and transparent procedures for integrated approaches to land-use planning, biodiversity, conservation and mining.		<p>This is contained in the Environmental policy signed off by the CEO (with a strong commitment to Biodiversity and protected areas) and supported by our approved Integrated Mine Closure Guideline and Biodiversity Guideline. This is also achieved through alignment with the ICMM position statement.</p>

Key	
	Evidence lacking
	Partially compliant
	Fully compliant
	Not applicable



**Principle 8: Responsible Production**

**Facilitate and support the knowledge-base and systems for responsible design, use, re-use, recycling and disposal of products containing metals and minerals**



**Associated Gold Fields Policy Statement:**

Material and Supply Chain Stewardship

In relation to corporate vision/policies		Compliance	Comments
1	Advance understanding of the properties of metals and minerals and their life-cycle effects on human health and the environment.		This is primarily achieved through Gold Fields' membership of the ICMM. Gold Fields' products are gold and copper. Due to their value, disposal of gold or copper is not considered and once it has left our custody (i.e. from our smelters/process plants) those who have purchased it take responsibility for reuse and recycling - if applicable. However, a clear commitment to the implementation of best practice with regards to material stewardship and supply chain management and to encourage or require, where practical, business partners, contractors and suppliers to adopt similar objectives is contained in our Group Material and Supply Chain Stewardship Policy Statement, which was updated in 2019. Our materials stewardship efforts in relation to waste management are reported on in our IAR and GRI report and managed through the ISO 14001 environmental management systems at our operations. Our Integrated Energy and Carbon Management Strategy drives efficient use of energy and our Climate Change Policy Statement supports this, as does the Energy and Carbon Management Guideline. Gold Fields also conforms to the World Gold Council's Conflict Free Gold Standard. Note Our 'Circular Economy' note developed in 2020.
2	Conduct or support research and innovation that promotes the use of products and technologies that are safe and efficient in their use of energy, natural resources and other materials.		This is primarily achieved through Gold Fields' membership of the ICMM. Our Sustainable Development suite of policies emphasises our commitment to supporting research and innovation.
3	Develop and promote the concept of integrated materials management throughout the metals and minerals value chain.		This is achieved through Gold Fields' membership of the ICMM.
4	Provide regulators and other stakeholders scientifically sound data and analysis regarding our products and operations on which they can make regulatory decisions.		When applicable we engage with the authorities and through ICMM, Minerals Councils and / or Chambers of Mines and other similar platforms.
5	Support the development of scientifically sound policies, regulations, product standards and material choices that encourage the safe use of mineral and metal products.		This is achieved through Gold Fields' membership of the ICMM, Minerals Councils and / or Chambers of Mines.

Key	
	Evidence lacking
	Partially compliant
	Fully compliant
	Not applicable

**Principle 9: Social Performance**

**Pursue continual improvement in social performance and contribute to the social, economic and institutional development of host countries and communities**

**Associated Gold Fields Policy Statement:**

Sustainable Development

Community

Stakeholder Relationship and Engagement



In relation to corporate vision/policies	Compliance	Comments
<p>1 Engage at the earliest practical stage with all likely affected parties to discuss and respond to issues and conflicts concerning the management of social impacts.</p>	<p>Fully compliant</p>	<p>Stakeholder engagement, guided by culturally appropriate plans, is undertaken during all phases of the life of mine including as part of Environmental and Social Impact Assessments, when issues and impacts identified on an ongoing basis during operations. Practical guidance on the achievement of policy commitments is provided in Gold Fields Community Relations and Stakeholder Engagement Guideline and H which provide detail on nine standards that are guided by ICMM and United Nations Global Compact including building relationships, effective engagement, conflict management, socio-economic development, social impact assessment, resettlement, Indigenous Peoples, artisanal and small-scale mining, and social closure. All operations have grievance mechanisms in place. Sites reviewed their grievance mechanisms against the UNGP effectiveness criteria in 2019 and are working to close gaps. An Indigenous Peoples strategy was implemented in Australia in 2019 aligned to Gold Fields and Reconciliation Australia's guidance. Implementation of a Reconciliation Australia endorsed Reflect Reconciliation Action Plan (RAP) commenced in early 2020 with a focus on building trusted relations, delivering benefits and demonstrating respect. A key learning from the Juukan Gorge incident is that ongoing transparent stakeholder engagement must be closely allied to legal approval and heritage management processes. Stakeholder engagement remains a key focus at our Australian operations. Our Ghanaian Region updated its Artisanal and small-scale mining strategy in late 2019. The strategy is aligned to Gold Fields guidance and includes more proactive engagement with stakeholders, support for the creation of non-mining jobs and updating our protection services practices which are aligned with the Voluntary Principles on Security and Human Rights. In 2020 we undertook independent country risk reviews in Australia, Chile, Peru and Ghana considering post-Coronavirus pandemic scenarios in support of stakeholder collaboration and future development contributions. Gold Fields implements Concept, PreFeasibility and Feasibility Studies for investment projects, which include sustainability requirements for environmental and water stewardship, climate and energy, mine closure and tailings management, social and community.</p>
<p>2 Ensure that appropriate systems are in place for continual interaction with affected parties; ensure that minorities and other marginalised groups have equitable and culturally appropriate means of engagement.</p>	<p>Fully compliant</p>	<p>We updated our Stakeholder Relationship and Engagement Policy Statement in 2020. Stakeholder engagement, guided by culturally appropriate plans, is undertaken during all phases of the life of mine including as part of Environmental and Social Impact Assessments, when issues and impacts are identified on an ongoing basis during operations. Practical guidance on the achievement of policy commitments is provided in Gold Fields Community Relations and Stakeholder Engagement Guideline and Handbook which provide detail on nine standards that are guided by ICMM and United Nations Global Compact including building relationships, effective engagement, conflict management, socio-economic development, social impact assessment, resettlement, Indigenous Peoples, artisanal and small-scale mining, and social closure. All operations have grievance mechanisms in place. Sites reviewed their grievance mechanisms against the UNGP effectiveness criteria in 2019 and are working to close gaps. An Indigenous Peoples strategy was implemented in Australia in 2019 aligned to Gold Fields and Reconciliation Australia's guidance. Implementation of a Reconciliation Australia endorsed Reflect Reconciliation Action Plan (RAP) commenced in early 2020 with a focus on building trusted relations, delivering benefits and demonstrating respect. A key learning from the Juukan Gorge incident is that ongoing transparent stakeholder engagement must be closely allied to legal approval and heritage management processes. Stakeholder engagement remains a key focus at our Australian operations. Our Ghanaian Region updated its Artisanal and small-scale mining strategy in late 2019. The strategy is aligned to Gold Fields guidance and includes more proactive engagement with stakeholders, support for the creation of non-mining jobs and updating our protection services practices which are aligned with the Voluntary Principles on Security and Human Rights. In 2020 we undertook independent country risk reviews in Australia, Chile, Peru and Ghana considering post-Coronavirus pandemic scenarios in support of stakeholder collaboration and future development contributions.</p>
<p>3 Contribute to community development from exploration to closure in collaboration with host communities and their representatives.</p>	<p>Fully compliant</p>	<p>Operations are required to have community relations plans, including community investment in place which guide Gold Fields' social investment in our host communities. Plans are derived in consultation with host communities and government and are executed in partnership with community, government, donors, NGOs and Gold Fields Trusts and Foundations. Gold Fields follows a shared value approach to invest in our host communities and address business and societal needs. We publish our socio-economic development type and spend and total community value creation in our IAR. Gold Fields places significant emphasis on Host Community Employment and Procurements as part of our development and shared value approach. In 2018 Gold Fields implemented host community procurement and job creation guidance to standardise definitions, measurement and enable group consolidation and reporting. In 2020 we developed non-mining jobs guidance for implementation from 2021. Since March 2020, our operations have collaborated with peers, governments, communities, NGOs in our active support for host communities and governments efforts in controlling the Coronavirus pandemic and assisting people in need. Case studies and examples are reported in our 2020 IAR, 2020 Report to Stakeholders, and social media posts.</p>
<p>4 Encourage partnerships with governments and non-governmental organisations to ensure that programmes (such as community health, education, local business development) are well designed and effectively delivered.</p>	<p>Fully compliant</p>	<p>Operations are required to have community relations plans, including community investment in place which guide Gold Fields' social investment in our host communities. Plans are derived in consultation with host communities and government and are executed in partnership with community, government, donors, NGOs and Gold Fields Trusts and Foundations. Gold Fields follows a shared value approach to invest in our host communities and address business and societal needs. We publish our socio-economic development type and spend and total community value creation in our IAR. Gold Fields places significant emphasis on Host Community Employment and Procurements as part of our development and shared value approach. In 2018 Gold Fields implemented host community procurement and job creation guidance to standardise definitions, measurement and enable group consolidation and reporting. In 2020 we developed non-mining jobs guidance for implementation from 2021. Since March 2020, our operations have collaborated with peers, governments, communities, NGOs in our active support for host communities and governments efforts in controlling the Coronavirus pandemic and assisting people in need. Case studies and examples are reported in our 2020 IAR, 2020 Report to Stakeholders, and social media posts.</p>
<p>5 Enhance social and economic development by seeking opportunities to address poverty.</p>	<p>Fully compliant</p>	<p>Operations are required to have community relations plans, including community investment in place which guide Gold Fields' social investment in our host communities. Plans are derived in consultation with host communities and government and are executed in partnership with community, government, donors, NGOs and Gold Fields Trusts and Foundations. Gold Fields follows a shared value approach to invest in our host communities and address business and societal needs. We publish our socio-economic development type and spend and total community value creation in our IAR. Gold Fields places significant emphasis on Host Community Employment and Procurements as part of our development and shared value approach. In 2018 Gold Fields implemented host community procurement and job creation guidance to standardise definitions, measurement and enable group consolidation and reporting. In 2020 we developed non-mining jobs guidance for implementation from 2021. These approaches also work towards addressing poverty. Since 2020, our operations have collaborated with peers, governments, communities, NGOs in our active support for host communities and governments efforts in controlling the Coronavirus pandemic and assisting people in need. Case studies and examples are reported in our 2020 IAR, 2020 Report to Stakeholders, and social media posts.</p>

Key	
■	Evidence lacking
■	Partially compliant
■	Fully compliant
■	Not applicable

**Principle 10: Stakeholder Engagement**

**Proactively engage key stakeholders on sustainable development challenges and opportunities in an open and transparent manner. Effectively report and independently verify progress**



**Associated Gold Fields Policy Statement:**  
Stakeholder Relationship and Engagement

In relation to corporate vision/policies		Compliance	Comments
1	Report on economic, social and environmental performance and contribution to sustainable development.		All material information is reported in our independently assured 2020 IAR, GRI Content Index Report and Report to Stakeholders available on our website. In 2020 we held a dedicated ESG Webcast with over 170 including investors, analysts, media, consultants, NGOs, business partners, Gold Fields employees and directors. We launched our inaugural Report to Stakeholders 2019/H1 2020 providing an overview of our performance and relationships with key stakeholders groups, particularly communities.
2	Engage with and respond to stakeholders through open consultation.		All material information is reported in our 2020 IAR, GRI Content Index Report and Report to Stakeholders available on our website. In 2020 we held a dedicated ESG Webcast with over 170 including investors, analysts, media, consultants, NGOs, business partners, Gold Fields employees and directors. We launched our inaugural Report to Stakeholders 2019/H1 2020 providing an overview of our performance and relationships with key stakeholders groups, particularly communities. See also the comments on Principles 4 and 9.

Key	
	Evidence lacking
	Partially compliant
	Fully compliant
	Not applicable

## Alignment of Company Position with ICM 10 Principles

ICMM Position Statement	% Compliance	Compliance Status per Commitment
Disclosure	100%	1
		2
		3
		4
		5
Principle 1	100%	1
		2
		3
		4
Principle 2	100%	1
		2
		3
		4
		5
		6
Principle 3	100%	1
		2
		3
		4
		5
		6
Principle 4	100%	1
		2
		3
		4
Principle 5	100%	1
		2
		3
		4
Principle 6	100%	1
		2
		3
		4
		5
Principle 7	100%	1
		2
		3
Principle 8	100%	1
		2
		3
		4
		5
Principle 9	100%	1
		2
		3
		4
		5
Principle 10	100%	1
		2

Key	
	Evidence lacking
	Partially compliant
	Fully compliant
	Not applicable