

Newmont Corporation

Tax Strategy

Introduction

With 100 years of history in the mining industry, Newmont Corporation (“we” or the “Company”) is one of the world's leading gold producers. Our purpose is to create value and improve lives through sustainable and responsible mining. The Company was founded in 1921 and has been publicly traded since 1925. Headquartered in Colorado, the Company’s world-class portfolio of assets, prospects and talent is anchored in favorable mining jurisdictions in North America, South America, Australia and Africa. Newmont is the only gold producer listed in the S&P 500 Index and is widely recognized for its principled environmental, social and governance practices.

Newmont is committed to complying with the tax laws and practices in all jurisdictions where we operate. We strive to be a world-class operator, a responsible corporate citizen and good employer. The Company is committed to paying the right amount of tax and being transparent, cooperative and ethical.

Tax Strategy

Newmont is subject to many different tax regimes and regulations in diverse jurisdictions around the globe. The Company’s tax strategy can be summarized as follows:

- Ensure that all material tax filings and payments are met
- Manage tax affairs in a manner consistent with the Company’s commercial objectives and in full compliance with the law and/or applicable investment and/or stability agreements in effect
- Maintain an open, collaborative and ethical relationship with tax authorities
- Take an overall conservative approach to tax risk
- Follow the arms’ length principle for all material intercompany transactions in accordance with transfer pricing principles

Governance

Newmont oversees its tax affairs through multiple levels of management. The Company has a global team of tax professionals; located in all of its operating jurisdictions, charged with managing their respective tax affairs in line with Newmont’s Code of Conduct, global tax strategy and internal policies.

The Chief Financial Officer has ultimate responsibility for setting Newmont’s tax strategy. The day-to-day operational responsibility for the execution of tax policy resides with the Vice President of Tax. The Vice President of Tax and Chief Financial Officer reports tax matters to the Board’s Audit Committee on a regular basis. Newmont’s tax strategy is reviewed and approved formally by the Board on an annual basis.

Tax Risk Management

The identification and management of tax risks is central to achieving Newmont's purpose to create value and improve lives through sustainable and responsible mining. Risk management is embedded in all of the Company's critical business activities, functions, processes and systems. Newmont regularly assesses known, new and emerging risks. The Company ensures that controls are in place around material risks, and periodically assesses the effectiveness of those controls. The materiality of a risk is assessed based on the degree of financial and non-financial impacts to the business. Tax risks are managed through the entire life cycle of the Company's operations.

Due to the size of Newmont's global business and the many tax obligations that the Company is subject to, some tax risks inevitably arise. Newmont's global tax team works to proactively identify and manage those risks. When there is uncertainty with regard to a risk, the Company may seek external advice and works to minimize those risks where possible.

Newmont's external auditors review material tax risks, and tax authorities routinely review the Company's tax returns.

Approach to Tax Planning

Newmont seeks to balance the impacts of its tax planning on all stakeholders, including shareholders and governments. The Company works to align tax planning with its Code of Conduct. Newmont complies with the tax laws in the countries in which it creates value by paying the right amount of tax at the right time.

Newmont also seeks certainty on its tax obligations and positions to ensure the long-term sustainability of the business and the livelihoods it supports. When tax laws are unclear, the Company seeks external guidance to ensure that its positions are more-likely-than-not to be upheld. All tax planning has commercial and economic substance and the Company does not engage in planning that is contrived or artificial. Tax havens are not used for tax planning purposes.

Newmont's transactions between entities / companies within the Newmont group are done at arm's length in accordance with the guidelines set forth by the Organization for Economic Co-operation and Development.

When tax incentives are offered by governments, Newmont seeks to implement them in the manner intended. The Company will only utilize them to the extent that they are consistent with business objectives.

Approach to Engaging with Tax Authorities

Newmont seeks to maintain open, constructive and ethical relationships with tax authorities. The Company strives for transparency in all of its dealings with tax authorities. Newmont attempts to work collaboratively with tax authorities to resolve disputes where tax laws are unclear, in a timely manner. Newmont will seek to protect its position in the courts where the Company believes a tax authority has assessed a transaction or position incorrectly or unfairly under the law.

Newmont also interacts with governments on the development of fair, clear and predictable tax laws. The Company does this directly or through various industry organizations.