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13 October 2025

[REDACTED]  
PAX & IPIS

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Via email: [REDACTED]

[REDACTED]  
**RE: ARTISINAL MINERS IN KIBALI'S CONCESSION**

We refer to your correspondence on 4 September 2025, which requested a written response to the documents ("*Fact Sheet*" and "*Advocacy Paper*") submitted to Kibali regarding exploration concessions in the Faradje Region, approximately 70km north from the Kibali mine.

Artisanal and small-scale mining (ASM) is a widespread reality in many regions where Barrick operates, including Kibali. As noted in our Sustainability Report (2024) (link: [https://s25.q4cdn.com/322814910/files/doc\\_downloads/sustainability/Barrick\\_Sustainability\\_Report\\_2024.pdf](https://s25.q4cdn.com/322814910/files/doc_downloads/sustainability/Barrick_Sustainability_Report_2024.pdf)) "*ASM takes both legal and illegal forms, presenting complex challenges for responsible mining companies and host communities*".

***Artisanal and Small-Scale Miners vs Illegal Miners***

ASM provides an income to communities and households be it as a full-time occupation or to supplement their needs from other occupations like farming. There is a clear distinction, however, between legal and illegal ASM. In a combined paper by the International Finance Corporation (IFC), World Bank and the International Council for Mining and Metals (ICMM) (link: <https://www.icmm.com/en-gb/guidance/social-performance/2010/artisanal-and-small-scale-miners>) it is recognised that the majority of "ASM operators" are deemed illegal. Illegal ASM miners are defined as those who do not own mining concessions, mine illegally on other parties' mining or exploration concessions, and / or are selling their product through black-market channels and may have other nefarious activities such as money laundering.

As pointed out in PAX's paper (pg. 6 of "*Kibali and Artisanal Miners – Advocacy Paper*" document), "*artisanal mining in Kibali's concession is technically illegal*". That is, none of the mining activities in the Faradje Region, be it local Congolese operators or expatriate operators such as the Chinese, have any legitimate government approved concessions. By consequence, these activities within Kibali's concessions are illegal mining operations. We regularly bring this to governments attention in order for them to address this responsibly. Consequently, the remainder of our response refers to these activities as illegal ASM operators.

***Challenges of Illegal Mining Operations***

As raised by PAX, illegal mining has several adverse safety, social and environmental impacts. We share this view. This is particularly evident where such mining has become mechanized, funded and linked to other illicit activities including money laundering. While illegal mining may have existed in the past, it is quite different from the size and level of illegal mining activities currently taking place in the

Authorised Share Capital: USD 10 000 000  
Issued Share Capital: USD 10 000 000

a Barrick Mining Corporation, AngloGold Ashanti Limited and the State of the Democratic Republic of the Congo joint venture company  
une société de joint-venture de Barrick Mining Corporation, AngloGold Ashanti Limited et l'état de la République démocratique du Congo

area. This has had a significant negative impact on the legal activities of registered ASM operators, which do exist in the area.

Moreover, activities from illegal ASM operators on social and environmental aspects include for example the use of mercury, leading to human and environmental exposure. Uncontrolled diversion of rivers and mining/dredging within the riverbed resulting in water quality issues as well as water shortage making it difficult to sustain wildlife, ecosystems and the communities that rely on those water sources, amongst other significant impacts. These consequences from illegal and unregulated mining often leave vulnerable groups, such as women and children, most exposed.

Kibali does not support any illegal activities and the consequences, be it safety, social or environmental. Despite Kibali and PAX both agreeing that the negative consequences of illegal mining are significant, it is troubling to see that PAX is suggesting these risks are “justified” and should be expanded on the basis that these activities are a defensible livelihood.

### ***Barrick's Approach***

Barrick operates on three basic principles, as guided by the ICMM:

- We support engagement with government and local communities to manage ASM-related challenges;
- ASM activities and illegal miners may not encroach our legally permitted mining areas; and
- Gold mined and processed by our own operations only, ensuring transparent and responsible supply chains as per the OECD Guidelines and responsible mining principles. We do not and will not source ore or gold from any third parties.

Where regulated, legal ASM can contribute to growing the local economy. The responsibility and regulation of these activities falls with the government.

In-country investment of \$6.3billion over the past 15 years has been invested in local contractors and suppliers, royalties and taxes to government, salaries to employees and infrastructure & community support. Our community support of \$241million has led to the establishment of 28 health care centres and clinics, supporting over 500,000 people. Over 30 schools have been built to giving opportunity for school children to be educated. 34 local businesses have been trained to formalize their business plans to be eligible for micro loans. Although this investment has been focused around the Kibali mine, where our operations are, we have seen significant improvement in the livelihoods of our local communities, evident by the significant influx to the surroundings in comparison to adjacent rural areas in the region.

While the intentions of your letter are unclear, it appears that PAX and IPIS are suggesting Kibali participate in supporting illegal ASM operations. We believe the recommendations contained in your documents are irresponsible and will not benefit the broader community. We do not support these suggestions. Instead, we believe it would be best for PAX and IPIS to participate in projects focused on community development and strengthening regulatory capacity, where real tangible benefit can be realised, as demonstrated by the investment that Kibali has funded to date.

Kind regards,

*Thomas Wilson*

Thomas Wilson

AME Head of Sustainability