

## LONG-FORM NOTICE

**DID YOU BUY BARRICK GOLD CORPORATION SHARES BETWEEN JULY 26, 2012 AND OCTOBER 31, 2013?**

**YOU COULD BE A MEMBER OF A CLASS ACTION.**

The Court of Appeal of Québec has authorized Anas Nseir (the “**Plaintiff**”) to institute a class action against Barrick Gold Corporation (“**Barrick**”) and two of its former officers under the Québec *Securities Act* (the “**QSA**”) (File number: Court of Appeal 500-09-029157-203/Superior Court 500-06-000693-149).

The Plaintiff alleges that Barrick made a false or misleading representation at the beginning of the relevant period when it announced that a step in the construction of the Pascua-Lama mining project - called “pre-stripping” - had been initiated. According to the Plaintiff, this representation falsely indicated that this “pre-stripping” had been initiated in compliance with the project’s environmental obligations.

Specifically, the Plaintiff alleges that the following representation made by Barrick on July 26, 2012, was false or misleading under the QSA: “*During the second quarter, the project achieved critical milestones with completion of Phase 1 of the pioneering road and also the water management system in Chile, both of which enabled the commencement of pre-stripping activities*”. The Plaintiff alleges that the price of Barrick’s shares fell when this representation was publicly corrected. The Plaintiff’s allegations have not yet been proven on the merits, and the Defendants deny the Plaintiff’s allegations.

### **WHO IS CONCERNED?**

The Court of Appeal of Québec authorized the class action on behalf of the class described as follows:

*All natural persons and legal persons who reside in Quebec and acquired securities of Barrick Gold Corporation between July 26, 2012, and October 31, 2013, except the defendants, all officers and directors of Barrick Gold Corporation during the class period, members of their immediate families and their legal representatives, heirs, successors or assigns, and any entity in which the excluded persons have a controlling interest now or during the class period.*

**THE LAWYERS’ FEES** will be paid only in the event of success and according to a percentage approved by the Court. As such, you do not have to pay anything unless you obtain compensation.

## **YOUR CHOICES CONCERNING THE CLASS ACTION**

### **INCLUSION**

You are automatically included in the class action if you are a member of the class described above. As such, you do not have to identify yourself to opt-in, and you do not have to do anything for the time being.

You may contact the Plaintiff's lawyers (see the information on their "newsletter" at the end of this notice) to keep track of developments and be informed of your rights.

By participating in this action, the judgment that will be issued in the class action will apply to you.

### **OPT-OUT, UNTIL APRIL 7, 2025**

If you do not want the judgment issued in the class action to apply to you, you must opt-out from the class action.

It may be in your interest to opt-out if, for example, you prefer to pursue your own individual action, at your own expense, against the Defendants.

Opting-out implies that you will not be entitled to any compensation if a favourable judgment or settlement is reached in this class action.

If you wish to opt-out, you must send **a letter to the clerk's office of the Superior Court of Québec** with a copy to the Plaintiff's lawyers, no later than April 7, 2025, indicating file number 500-06-000693-149 :

Clerk of the Superior Court of Québec  
(S.C.M. 500-06-000693-149)  
1, Notre-Dame East St,  
Montréal (QC) H2Y 1B6

Trudel Johnston & Lespérance  
750, Place d'Armes, suite 90  
Montréal (QC) H2Y 2X8  
[info@tjl.quebec](mailto:info@tjl.quebec)

### **INTERVENTION**

You do not need to intervene to be entitled to compensation. You may, however, apply to the Superior Court of Québec to intervene in the class action to assist the class representative. You must then consult a lawyer at your own expense to undertake the intervention procedures. The Court will authorize your intervention if it is of the opinion that it is useful to the class.

## THE NEXT STEPS

The authorization judgment is a preliminary step. It does not determine the liability of the Defendants, who will be able to plead their defences at trial.

It is following this trial, which will take place in the district of Montréal, that the Superior Court will decide whether the Defendants are liable and should be ordered to compensate the members and, if so, the amount that will be paid, if any, and whether the recovery, if any, is individual or collective.

## QUESTIONS DEALT WITH COLLECTIVELY

Here are the main issues to be decided by the Court for the benefit of members:

1. Were Barrick Gold Corporation's July 26, 2012, representations regarding the environmental compliance of Pascua-Lama's water management system materially misleading?
2. Was that misrepresentation publicly corrected and, if so, when?
3. Is the defendants' due diligence defence meritorious?
4. Are class members entitled to damages and, if so, in what amount?

## THE CONCLUSIONS SOUGHT

Here is what the Plaintiff is claiming from the Court for the benefit of the class members:

- A) **GRANT** the class action against the defendants;
- B) **DECLARE** that Barrick Gold Corporation's July 26, 2012, representations regarding the environmental compliance of Pascua-Lama's water management system were materially misleading;
- C) **CONDEMN** the defendants to pay for the damages suffered by the class members;
- D) **ORDER** the defendants to pay each member of the class their respective claims, plus interest at the legal rate as well as the additional indemnity provided for in article 1619 C.C.Q.
- E) **ORDER** the collective recovery of all sums owed to the class members;
- F) **THE WHOLE** with costs, including the cost of all experts, expert reports and notices;

## TO STAY INFORMED

To stay informed of the progress of the class action, **sign up for the class action newsletter** with the Plaintiff's lawyers, by filling out the appropriate [form](#).

➔ **PLEASE NOTE. Your newsletter subscription is not a claim!** If the class action is successful, you will have to file your claim according to the procedure determined by the Court.

You can also consult the [Central Registry of Class Actions](#).

## CONTACT

You may **contact** the Plaintiff's lawyers at the following coordinates, specifying that your communication concerns the class action against Barrick Gold Corporation:



**Trudel Johnston & Lespérance**  
750, Côte de la Place d'Armes, suite 90  
Montréal (Québec) H2Y 2X8  
Telephone: 514-871-8385  
Email: [info@tjl.quebec](mailto:info@tjl.quebec)

**P.S. The text of this notice prevails over the text of any abridged notice.  
This notice has been authorized by the Court.**