



Kassandra Mines Project



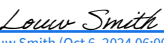
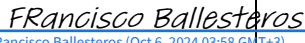


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Related Documents

Reference	Title
SIMS	Sustainability Integrated Management System (Standard)
ESMS	Environment and Social Management System Framework
ESMP	Environmental and Social Management Plan
ERP	Emergency Response Plan
EWMP	Extractive Waste Management Plan
HMP	Hazardous Waste Management Plan
CHSMP	Community Health and Safety Management Plan
WMP	Water Resources Management Plan
CMP	Contractor Management Plan

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List of Acronyms

Name	Definition
Aol	Area of Influence
CIC	Community of Interest Committee
EBRD	European Bank for Reconstruction and Development
EIA	Environmental Impact Assessment
ESIA	Environmental and Social Impact Assessment
ESMS	Environmental and Social Management System
ESMP	Environmental and Social Management System
EU	European Union
IEMS	Integrated Environmental Management System
IFC	International Finance Corporation
KPI	Key Performance Indicator
NGO	Non-governmental Organisation
SEP	Stakeholder Engagement Plan
SIMS	Sustainability Integrated Management System
VP	Vice President

1 Introduction

1.1 Summary

This Stakeholder Engagement Plan (SEP) for the Cassandra Mines Project (the Project) establishes the processes and program by which external stakeholders, with a focus on local stakeholders, are consulted and engaged to build and maintain constructive relationships.

The SEP also defines the internal processes within Hellas Gold that will support the assessment and integration of stakeholder feedback into the business decisions and operations.

This Management Plan supports the Hellas Gold Environmental & Social Management Plan (ESMP) (Doc No HG-01-N-TAM-0001-A-ENG). Any subsequent changes to the ESMP Plan may result in changes to this Management Plan.

1.2 Purpose and Objectives

The purpose of this plan is to create a meaningful two-way, inclusive and accessible approach to stakeholder engagement for the Project including:

- Proactively identify, analyse and include in the engagement program the stakeholders that: a) are affected, or are likely to be affected, (directly or indirectly) by the Project, or b) may have an interest in Cassandra Mines
- Establish processes to keep stakeholders meaningfully and appropriately informed throughout the life cycle of existing mining operations and upcoming projects
- Describe the process by which stakeholders can provide comments and input, communicate opinions, ask questions, express concerns, and raise grievances, if any
- Establish mechanisms and procedures to respond to stakeholder concerns and expectations regarding the Project and ensure that their views are considered in Project development
- Explain how stakeholder comments and inputs will be considered and incorporated as appropriate throughout the Project life cycle
- Support active, accessible and inclusive engagement methods that consider stakeholders characteristics, including disadvantaged or vulnerable groups, and is free from undue influence.

The key objectives are to:

- Define the stakeholder engagement controls and identify interfaces with other relevant management plans
- Define roles and responsibilities
- Outline applicable standards, including Greek, EU and international legislation
- Define monitoring, evaluation and reporting procedures, including Key Performance Indicators (KPIs)
- Define training requirements.

1.3 Project Overview

The Kassandra Mines Project (the Project) refers collectively to the environmentally permitted subprojects of Stratoni–Mavres Petres, Olympias, and Skouries mines. The Project covers a total mining concession of 26,400 hectares (ha) in the Halkidiki Peninsula in northern Greece. The Project operator is Hellas Gold S.A. (Hellas Gold), under a contract signed with the Greek State (Contract No. 22138/12-12-2003) ratified by Law 3220/18.01.2004 (Government Gazette 15/A/2004) and amended by Law 4785/2021 (Government Gazette 42/A/23.3.2021). The EIA to support the development of the Skouries project and other activities summarised below was approved by the Director General of The Environment of The Ministry Of Environment And Energy on the 27 April 2023.

The subprojects at the Kassandra Mines are summarized below and included in Figure 1. A full summary of the Project description can be found in Chapter 5, Project Description, of the Environmental and Social Impact Assessment (ESIA), and a comprehensive Project Description is available in Chapter 6 of the approved regulatory Environmental Impact Assessment (EIA).

1.3.1 Stratoni–Mavres Petres

The Stratoni–Mavres Petres subproject is an existing underground silver-lead-zinc mine. In October 2021, Hellas Gold announced that operations at Stratoni–Mavres Petres would transition to care and maintenance in Q4 2021 until potential inferred reserves become proven and probable. Upon completion of this process, the Stratoni–Mavres Petres subproject is expected to be realized as follows:

- Development of the existing Mavres Petres mine to exploit the deposit of sulphide ores, with an extraction capacity of 1.8 x 10⁶ tonnes of ore from underground shafts
- Expand the existing flotation plant to an annual capacity of 400,000 tonnes of ore
- Various upgrade activities of installations at Mavres Petres Mine and Stratoni processing plant.

1.3.2 Stratoni Loading Facilities

The loading facilities are located on the coast at the north end of the 600m beach in the coastal village of Stratoni and include offices, a ship loading facility, a plant and planned reclaimed land at the beach.

1.3.3 Olympias

The Olympias subproject is an existing underground gold-silver-lead-zinc mine. Proposed development at this site includes:

- Development of the existing mine with an extractive capacity of 12.4 x 10⁶ tonnes of ore to exploit the auriferous deposits of mixed sulphide minerals by using underground mining techniques
- Development of the existing flotation plant with a full annual capacity of 650,000 tonnes of ore
- Various upgrade activities of installations at Olympias mine and processing plant

1.3.4 Kokkinolakkas Extractive Waste Management Facility

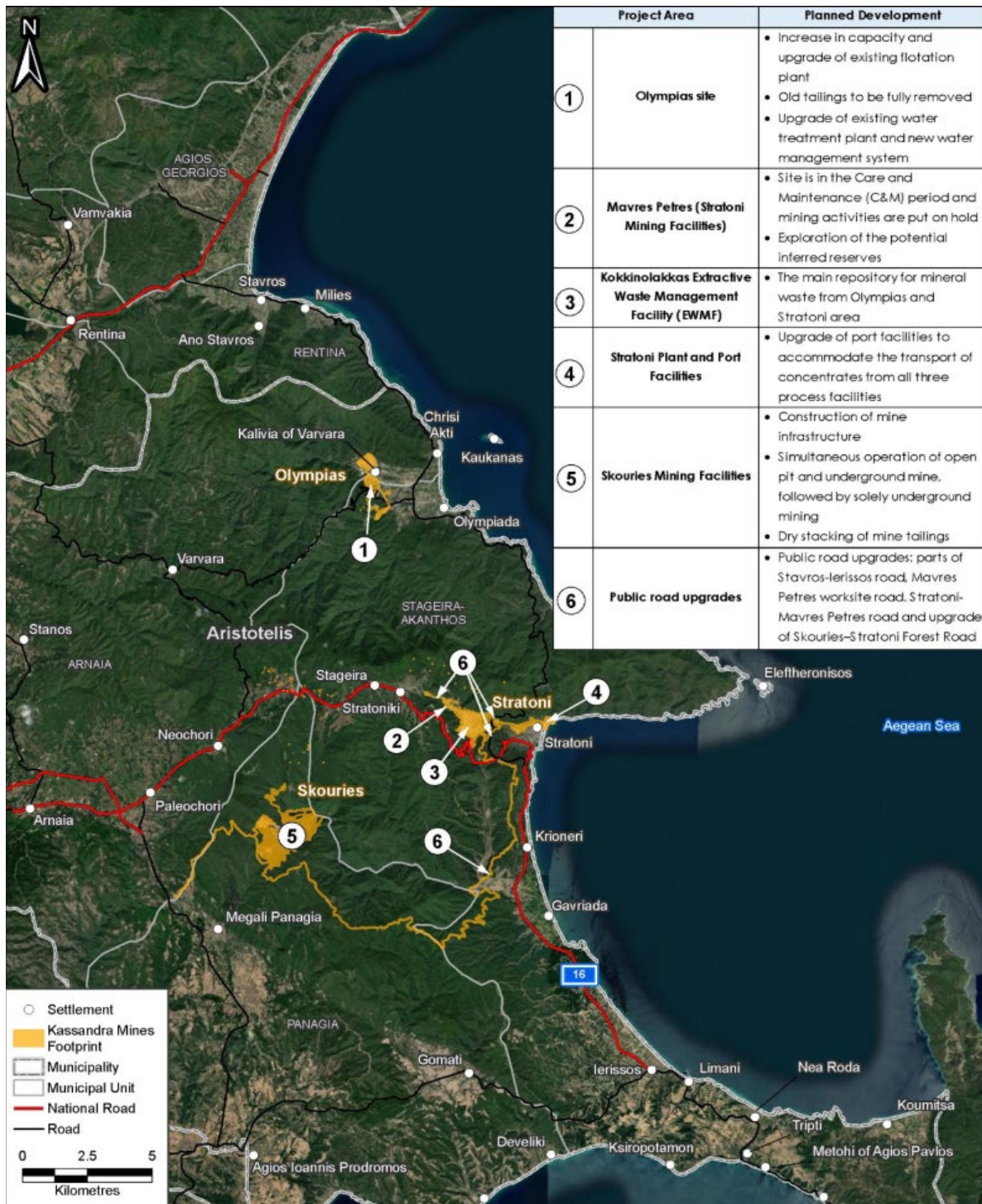
The Kokkinolakkas dry-stack tailings management facility is an active solid waste disposal facility in the upper basin of the Kokkinolakkas stream. It is used for the disposal of extractive waste from the Olympias and Stratoni–Mavres Petres subprojects and includes a water treatment plant.

1.3.5 Skouries Mining Facilities

The Skouries subproject is an open pit and underground gold-copper mine currently under construction. Activities included in this subproject include:

- Development of a new mine to exploit the gold-copper rich porphyry deposit, with an extraction capacity of 146.2 x 10⁶ tonnes of ore from surface mining and underground shafts
- Development of a new flotation plant and gravimetric separation of free gold with an annual capacity in full operation of 8 x 10⁶ tonnes of ore
- Extractive waste management facilities (disposal of dehydrated tailings and inert mining waste) at the location known as Karatzas Lakkos and mining waste facilities (inert mining waste).

Figure 1: Overview of Kassandra Mines Project Sites



2 Scope and Application

2.1 Scope

The scope of this Stakeholder Engagement Plan covers all Hellas Gold operations and projects in Greece. It applies to all employees and contractors working for Hellas Gold.

This version of the Stakeholder Engagement Plan focuses on the construction of the Skouries Project and operational activities at the other Kassandra mine sites. Section 2.3 provides a brief summary of the stakeholder engagement activities undertaken to support the EIA/ESIA.

2.2 Social Context

The Project is located within the administrative boundaries of the Municipality of Aristotelis, in the Regional Unit of Halkidiki within the Region of Central Macedonia. The area belongs to the Decentralized Administration of Macedonia–Thrace. Thessaloniki, the capital of Macedonia, is located around 100 km by road from the existing Olympias Mine and is readily accessible.

The Social Area of Influence (AoI) is used to describe the boundaries to which Project impacts may occur and is provided in Figure 2.

Figure 2: Area of influence



In establishing the Project's Social Aol, the ESIA study considered two factors: first, the proximity to the Project, and second, the interaction between communities and the Project. The Social Aol is defined to include the following:

- Proximity to the Project footprint and transport routes: A radius of 5 km around the Project footprint and a corridor approximately 2 km wide (1 km on either side) around the route of the public provincial transport network were included. The Project affected transport network is presented in Figure 2. Applying the transport corridor and the radius around the Project footprint helps to ensure that the Social Aol captures all of the likely significant impacts of the Project, whether direct, indirect, or induced, as well as a broader area for context (for more details see ESIA, Chapter 10, Socioeconomic Study).
- The interaction between communities and the Project: The Municipalities of Aristotelis and Volvi and four municipal units within those municipalities (Arnaia, Panagia, Stageira–Akanthos, and Rentina) are located in the proximity of the Project footprint and in the proximity of the road corridors that will be used by Project related transport. Based on the preliminary assessment of direct and indirect impacts, a list of potentially affected local communities was developed, see Table 1.

Table 1: Municipal and Local Communities within the Social Aol

Regional Unit and Municipality	Municipal Unit	Municipal/Local Community	Villages and Population (as of the 2021 Census)	Distance to Nearest Subproject Facilities ¹
Halkidiki, Municipality of Aristotelis	Arnaia	Municipal Community of Arnaia	Arnaia (2,159)	Skouries Mining Facilities (8 km)
		Local Community of Varvara	Varvara (539)	Olympias Mining Facilities (7.7 km) ²
		Local Community of Neochori	Neochori (696)	Skouries Mining Facilities (2.3 km)
		Local Community of Paleochori	Paleochori (1,262)	Skouries Mining Facilities (4.2 km)
	Panagia	Municipal Community of Megali Panagia	Megali Panagia (2,592)	Skouries Mining Facilities (3 km)
	Stageira–Akanthos	Municipal Community of Ierissos	Ierissos (3,208)	Stratoni Loading Facility (13.7 km)
		Local Community of Olympiada	Olympiada (638)	Olympias Mining Facilities (1 km)
		Local Community of Stageira	Stageira (373)	Stratoni Mining Facilities (1.5 km)
		Local Community of Stratoniki	Stratoniki (549)	Stratoni Mining Facilities (600 m)
		Local Community of Stratoni	Stratoni (992)	Stratoni Loading Facilities (20 m)
Thessaloniki, Municipality of Volvi	Municipal Unit of Rentina	Municipal Community of Stavros	Stavros (3,262)	Olympias Mining Facilities (7.2 km)

¹Distance calculated from the approximate centre of the settlement except for distances smaller than 2 km which were calculated from the nearest residence in that settlement

Regional Unit and Municipality	Municipal Unit	Municipal/Local Community	Villages and Population (as of the 2021 Census)	Distance to Nearest Subproject Facilities ¹
² Some buildings in the “Kalyvia of Varvara” area are located within 130 m of the intersection of the main access road and the local public main road. Verifications are underway to confirm the occupancy status of those buildings.				

2.3 Summary of previous engagement during the EIA/ESIA stage

Hellas Gold undertook an engagement program during the scoping and baseline data collection stage of the ESIA in 2021, with a wide range of stakeholders, including:

- Municipal and community leaders
- Community groups, including associations related to livelihood activities (fishing, forestry, tourism, beekeeping, and agriculture), women’s and business associations
- Civil society organizations including NGOs, labour unions, and citizen groups
- Regional public service providers including cultural heritage, health, education, and forestry

A range of formats were used for the meetings, including focus groups and individual meetings.

Following completion of the ESIA a 60-day disclosure period was initiated for the ESIA, the EIA Non-Technical Summary, the Environmental & Social Action Plan and the Stakeholder Engagement Plan. A comprehensive series of engagement meetings was completed in July, August and September 2022. The disclosure process included 12 events in 6 different locations in the social area of interest and 13 focus group meetings with respective groups of representatives of Communities, bodies, regional organizations and associations.

Numerous communication tools and materials were used to inform stakeholders and invite them to participate: a microsite on the Hellas Gold website providing detailed information about the consultation, a printed informative leaflet was distributed and posters placed in Social Aol, social media posts, publications on digital and print media, radio spots, as well as direct invitations were sent to selected stakeholders, such as public and private bodies and organizations. There was also a dedicated telephone helpline providing information and assistance to everyone interested.

In total, a dialogue was held with the participation of more than 300 people and representatives.

A legacy issue register has been prepared to track the issues raised during the EIA/ESIA engagement. This register is reviewed quarterly and annually to support the closure of the issues.

2.4 Interface with other Management Plans

This Plan reflects and aligns with the Environmental and Social Management system and supporting management plans, which have community health and safety implications, including:

- Environmental and Social Management Plan (HG-01-N-TAM-0001-A-ENG)
- Air Emissions Management Plan (Doc No HG-01-E-TAM-0002-A-ENG)

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- Noise and Vibration Management Plan (HG-01-E-TAM-0003-A-ENG)
 - Water Resource Management Plan (HG-01-E-TAM-0004-B-ENG)
 - Contractor Management Plan (HG-001-80-PRO- 001-PRO-012)
 - Emergency Response Plan (Doc No HG-01-O-TAM-0001-A-ENG)
 - Crisis Communication Manual
 - Guidance For Social Conduct by Employees and Contractors
 - Third Party Grievance Management Procedure (Doc No HG-01-S-TAM-0009-A-ENG)

3 Roles and Responsibilities

3.1 Responsibility for Implementation and Monitoring

Key roles and responsibilities for implementation of the Stakeholder Engagement Plan are outlined in Table 2 below.

Table 2: Roles and Responsibilities

Role	Responsibilities
Skouries Project Manager, Greece	<ul style="list-style-type: none"> ■ Approval of Management Plan ■ Allocation of resources for implementation
General Manager of Operations, Greece	<ul style="list-style-type: none"> ■ Approval of Management Plan ■ Allocation of resources for implementation
Eldorado Gold Sustainability Director, Greece	<ul style="list-style-type: none"> ■ Accountable for delivering this Management Plan with the support of the Community Liaison Supervisor and Coordinators ■ Lead the collaboration with internal Hellas Gold teams and leadership to promote the cross-functional integration of stakeholder priority issues into business planning and operations ■ Monitor the performance and implementation of this plan and with the support of the Community Liaison Supervisor and cross-functional team make adaptations ■ Manages the CSR team (CSR Supervisor and CSR Officers), and the Community Liaison Officers (CLOs) and Grievance Coordinator ■ Senior point of contact for key external stakeholders ■ Leads on risk management for this plan including compliance monitoring and identification of mitigating and corrective actions
Hellas Gold Community Relations Supervisor, supported by the Community Liaison Coordinators	<ul style="list-style-type: none"> ■ Day-to-day implementation of this plan, providing an informed two-way dialogue between the communities and the Hellas Gold organisation ■ Serve as the primary point of contact for the community being present, contactable and approachable. ■ Plan and execute community engagement events, workshops, and meetings, including the Community of Interest Committee, to promote awareness of Hellas Gold initiatives and project activities, ensuring that stakeholders' comments/questions and their concerns are considered and answered. ■ Collaborate with internal Hellas Gold teams aligning them with feedback from the community and promoting the integration of applicable feedback and priority issues into business planning and operations ■ Develop and implement appropriate engagement mechanisms for vulnerable stakeholders ■ Update and maintain the reporting tools to support the

Role	Responsibilities
	implementation of this plan including the grievance procedure <ul style="list-style-type: none"> ■ Interface with Contractors and suppliers to ensure they are aware of the Hellas Gold expectations for community conduct, engagement and the grievance procedure, coordinating any contractor engagement activities ■ Support the assessment and investigation of social non-conformances, and incidents.
Hellas Gold Mine/Plant Managers and Contract Coordinators	<ul style="list-style-type: none"> ■ Ensure that relevant activities are undertaken in accordance with this Plan and that department personnel undertake supporting training ■ Ensure incident investigations are undertaken and reported.
All employees and contractors	<ul style="list-style-type: none"> ■ Comply with Hellas Gold company policies and procedures and with the requirements of this Plan.

4 Applicable Standards

The Project will comply with national Greek legislation, as well as applicable European and international directives and conventions, standards of Multilateral Development Bank (MDB) (EBRD and IFC), and voluntary sustainability standards including the World Gold Council and Mining Association of Canada.

Hellas Gold Environmental and Social Management System Documents, including this Plan, contain requirements in addition to any legal requirements applicable to Hellas Gold (arising from national and/or EU legislation and the EIA approval), and therefore no such provision has any effect whatsoever on the fulfilment of these legal obligations by Hellas Gold.

This document includes additional requirements formulated by, and incumbent on, Hellas Gold and, therefore, does not give any right to third parties and are not enforceable by any third party beyond any legal rights they may have in accordance with applicable laws.

4.1 Greek Legislation and European Legislation

As an entity operating in Greece, Hellas Gold complies with Greek legislation, which is derived from the Constitution of Greece, and the transposition of European Legislation into Greek national legislation.

The most relevant European legislation is:

- 2003/35/EC Directive, on public participation in respect of the drawing up of certain plans and programmes relating to the environment and amending with regard to public participation and access to justice (Council Directives 85/337/EEC and 96/61/EC)
- The most relevant national legislation includes:
 - L.4014/11, on procedures for environmental permitting, as amended by L.4685/20
 - Ministerial Decision (MD) 167563/2013, on specifications for the environmental permitting process (note: the MD refers, among others, to the means of incorporating public opinion)
 - Joint Ministerial Decision 1649/45/2014, on specification of the consultation procedures during the environmental permitting of category A projects and activities
 - L. 3422/05, on ratification of the Aarhus Convention (Directive 2013/35/EC).

National legislation focuses on stakeholder engagement during an EIA process. Hellas Gold undertook a comprehensive stakeholder engagement program in 2022 to support the EIA/ESIA incorporating the additional requirements within EBRD's Environmental and Social Policy.

In addition, the EIA approval terms, issued by the Director General of The Environment of The Ministry of Environment and Energy on 27 April 2023 include requirements associated with stakeholder engagement focusing on:

- Promoting the natural environment and cultural heritage resources within the Municipality of Aristotelis
- Establishing a stakeholder committee
- External reporting of the environmental monitoring program results, including continued

use of the web portal (<https://environmental.hellas-gold.com/>) that provides public access to the comprehensive environment monitoring data as well as annual reports and supporting meetings with the communities and competent authorities.

4.2 Sustainability Standards

Hellas Gold will implement the international lender standards set by the European Bank for Reconstruction and Development (EBRD) outlined in their 2019 Environmental and Social Policy and the 2012 International Finance Corporation (IFC) Performance Standards on Environmental and Social Sustainability.

Eldorado Gold implements the World Gold Council's Responsible Gold Mining Principles and the World Gold Council Conflict-Free Gold Standard, is also a corporate member of the Mining Association of Canada Towards Sustainable Mining, and adopts the Standard's Guiding Principles, Frameworks, Protocols and associated guidance.

4.3 Eldorado Gold and Hellas Gold Policies

Eldorado Gold's Sustainability Integrated Management System (SIMS) establishes company-wide sustainability requirements to support the commitment to responsible mining and sustainability excellence, from providing safe workplaces and maintaining respectful relationships with our stakeholders, to protecting the environment and investing in the communities where the company operates. SIMS includes five standards:

- General Standards
- Occupational Health and Safety Standards
- Environmental Performance Standards
- Social Performance Standards
- Security Standards

The SIMS standards apply to all phases of the mine life cycle and incorporate many internationally recognized management system standards, including the UN Global Compact Principles, World Gold Council Responsible Mining Principles and the International Organization for Standardization (ISO) management systems. SIMS explicitly incorporates the Mining Association of Canada – Toward Sustainable Mining Protocol and the International Cyanide Management Institute Management Principles.

Eldorado Gold and Hellas Gold have a number of environmental and social policies and procedures listed in Table 3 that complement SIMS. These policies and procedures have a range of applications including employees, contractors and supply chain partners, and are available in both Greek and English, the main languages spoken by the workforce. The policies and procedures are shared with employees via an induction training during onboarding and via periodic training sessions and updates.

Contractors, subcontractors and suppliers will be required to adopt applicable Hellas Gold labour policies, applicable procedures for contractor site-based activities and scope specific controls as per the qualification, bid evaluation and mobilisation phase in accordance with the Contractor Management Plan.

Table 3: Eldorado Gold and Hellas Gold Labour Management Policies and Procedures

Eldorado Gold	Hellas Gold
<ul style="list-style-type: none"> ■ Diversity Policy ■ Human Rights Policy ■ Respectful Workplace Policy ■ Social Performance Policy ■ Code of Ethics and Business Conduct ■ Supplier Code of Conduct ■ Anti-Bribery and Corruption Policy ■ Whistleblower Policy ■ Environmental Policy 	<ul style="list-style-type: none"> ■ Drugs and Alcohol Policy ■ Environmental and Energy Policy ■ Health and Safety Policy ■ Anti-Violence and Harassment Policy ■ Road Traffic Safety ■ Smoking Policy ■ Speed Limit Policy ■ Diversity and Equal Opportunity Policy ■ Guidance For Social Conduct By Employees And Contractors In The Community

Hellas Gold will follow the principles and approaches listed below to manage and/or address potential retaliation risks both to workers and to third parties:

- Hellas Gold commits to zero tolerance for any form of discrimination, harassment, disrespectful or inappropriate behaviour, intimidation or unfair treatment, retaliation or abuse of any kind in the workplace, or by the Hellas Gold employees or by employees of Hellas Gold suppliers and business partners. This principle is included in Eldorado Gold Code of Ethics and Business Conduct and Eldorado Gold Human Rights Policy. As part of the Security Management Plan, Hellas Gold will also develop and implement a zero-tolerance policy for retaliation against workers and external stakeholders, such as third parties / Project-affected people, and CSOs
- Hellas Gold will raise staff awareness and build capacity on reprisal risk to help facilitate an open feedback culture and support efforts to prevent reprisals, through communicating the company's policies and position on retaliation to workforce and stakeholders
- The above listed commitments are embedded into Hellas Gold contracts with contractors; contractors are also trained to follow the listed principles
- Hellas Gold maintains a grievance mechanism for 3rd parties and workers that is easily accessible to all workers and external stakeholders and provides for anonymity of the complainants
- Hellas Gold provides multiple avenues for submitting complaints, such as a free grievance hotline telephone number, online grievance form, grievance drop boxes or committees
- Hellas Gold ensures worker representation at occupational health and safety committees or any other workplace committees as this can help channel worker concerns and avoid retaliation against individuals who are raising concerns. Hellas Gold will ensure female representation in the workplace committees to address situations when potential risks of GBVH may intersect with retaliation risks
- Anonymous feedback will be possible through comment boxes and online feedback forms
- Hellas Gold has established local collaborative structures, such as CIC, to actively engage in accordance with the relevant Management Plan. Individuals may address their concerns through these local structures if they are reluctant to directly approach the Project

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- Hellas Gold will develop and implement a Inclusive Diversity Roadmap Map for the Project, including mitigation measures regarding GBVH. The Grievance Management Framework has been amended to include specific provisions to manage grievances related to GBVH (for details see Section 7.4, Process for Community Grievance Mechanism). Hellas Gold will communicate information on available support and safety measures regarding GBVH issues, including through worker representatives, trade unions, and local organisations (while maintaining confidentiality).

5 Management Approach

5.1 Introduction

Stakeholder engagement is an essential part of the Cassandra mines project allowing Project-affected people and other concerned individuals, groups, and organizations to be informed about Project activities and anticipated impacts. It also provides stakeholders with opportunities to provide feedback and enable meaningful participation in Project planning, implementation and monitoring. It is an ongoing process aimed at building and maintaining strong and constructive relationships over time. The engagement methods, as well as their intensity and frequency, will be commensurate to the Project's development schedule as well as activity type and risk.

Following the disclosure of the ESIA, stakeholder engagement has continued to be carried out by Hellas Gold for the Cassandra Project in line with this Plan. This Plan will be updated every two years through construction and every three years during operations, or more frequently as required based on stakeholder feedback and changes to Project planning. The community relations team will carry out updates to the SEP, with the following intent:

- To make sure stakeholder lists and mapping remain accurate
- To review and amend, if necessary, information dissemination and engagement practices in order to continue to meet the needs of stakeholders
- To review and assess stakeholder participation in order to revise, if necessary, the frequency, means and format of engagement to meet the accessibility and participation requirements of all stakeholders

The below section provides an overview of the stakeholder engagement planning and implementation processes. Section 6 details the approach to monitoring, evaluation and reporting.

Compliance tasks to support implementation of this plan have been developed and appear in italics.

5.2 Stakeholder identification and analysis

Stakeholders include the following entities:

- Affected parties – persons or groups who are affected or likely to be affected (directly or indirectly) by the Project
- Interested parties – those who have an interest in the Project
- Influential parties – those who are able to influence the outcome of the Project, either positively or negatively.

Hellas Gold completed an extensive stakeholder identification and mapping exercise in 2020 that was updated during the EIA/ESIA engagement and disclosure program in 2021/2022 and continues to be revised as required to support the ongoing engagement program. Hellas Gold undertake stakeholder analysis using a range of attributes associated with the stakeholders as well as the dynamics of the interaction between Hellas Gold and the stakeholders.

Table 4 summarizes the current results of the stakeholder identification, analysis and ongoing consultation. It will be maintained and updated throughout the Project and is supported by a detailed stakeholder register that is maintained by the community liaison team.

SEP-CT-01: Annual review of the CIC report and internal reports will be undertaken to support revision of the stakeholder engagement register and preparation of the annual engagement plan.

Table 4: Summary of Stakeholders

Stakeholder Category	Interest in the Project	Stakeholder Groups
External Stakeholders		
National, Departmental (Central Macedonia) and Regional (Halkidiki) Levels		
Regional Administration	Key approval authority	<ul style="list-style-type: none"> Decentralized administration of Northern Greece Central Macedonia Region
Regulatory Bodies, Public services	Key approval authority	<ul style="list-style-type: none"> Environmental Permitting Department (DIPA) Environmental inspection body (SEE) - Northern Greece Inspection of Mines in Northern Greece Urban Planning & Environment Department Service of Antiquities of Halkidiki and Mount Athos General Division of Development and Environment – Regional Unit of Halkidiki, Polygyros Agriculture and Husbandry Department of Halkidiki Regional Unit Fisheries Department of Halkidiki Regional Unit
NGOs	Interest in environmental and social issues	<ul style="list-style-type: none"> Kallisto Greenpeace Hellas WWF Hellas Greek Ornithological Association Arcturos Isee Greek Association of Nature Protection Bankwatch and other potential International NGOs who might be interested in the Project
Unions	Workers' rights and labour conditions	<ul style="list-style-type: none"> Labour Union of Halkidiki, comprised of workers from all industries (mining, construction, touristic, manufacturing). There are 22 associations with 72 representatives, for around 10,000 workers
Academia	Project related education and training	<ul style="list-style-type: none"> Aristotle University of Thessaloniki (AUTH)
Professional Bodies	Potential contractors and suppliers	<ul style="list-style-type: none"> Technical Chamber of Greece/Central Macedonia Thessaloniki Chamber of Commerce and Industry Chamber of Commerce of Halkidiki (Polygyros)
Health	E&S impacts related to health; Project reliance on health services	<ul style="list-style-type: none"> Medical Association of Halkidiki General Hospital of Halkidiki – Polygyros
Civil Protection	Impacts of the Project on local safety, civil	<ul style="list-style-type: none"> Greece Civil Protection Police Department, Halkidiki

Stakeholder Category	Interest in the Project	Stakeholder Groups
	unrest, emergency planning	
National/International Media	Communication of Project-related information	<ul style="list-style-type: none"> • Newspapers • Radio • Television • Social Media
Opposition Parties – National/Regional Levels	Interest in environmental and social issues	<ul style="list-style-type: none"> • Syriza, notably the Halkidiki regional branch of the party • Antarsya, a small left extremist party
Municipal and Local Levels		
Municipal Administration	Host community; Approval authority; Interest in environmental and social issues	<ul style="list-style-type: none"> • Mayor of Aristotelis • President of Municipal Council - Municipality of Aristotelis • Mayor of Volvi • President of Municipal Council - Municipality of Volvi • Relevant municipal departments such as Technical Services Department (infrastructure networks), Social Services Department (minorities + gender equality), Drinking Water Department, and Urban Planning & Environment Department
Local Administration	Host community; Approval authority; Interest in environmental and social issues	<ul style="list-style-type: none"> • President of Local Council - Megali Panagia • Members of Local Council - Megali Panagia • President of Local Council - Paleochori • Members of Local Council - Paleochori • President of Local Council - Neochori • Members of Local Council - Neochori • President of Local Council - Stageira • Members of Local Council - Stageira • President of Local Council - Stratoniki • Members of Local Council - Stratoniki • President of Local Council - Stratoni • Members of Local Council - Stratoni • President of Local Council - Olympiada • Members of Local Council - Olympiada • President of Local Council - Arnaia • Members of Local Council - Arnaia • President of Local Council - Ierissos • Members of Local Council – Ierissos • President of Local Council - Stanos • Members of Local Council – Stanos • President of Local Council - Varvara • Members of Local Council – Varvara • President of Local Council - Stavros • Members of Local Council - Stavros
Regulatory Bodies/Public Services	Interest in environmental and social issues	<ul style="list-style-type: none"> • Forestry Authority of Arnaia • Port authority of Ierissos (also cover Stratoni Port Station/recreational port) • Port authority of Stavros

Stakeholder Category	Interest in the Project	Stakeholder Groups
Opposition Parties – Municipal Level	Interest in environmental and social issues	<ul style="list-style-type: none"> • Anasigkritisi – opposition party at the local Municipal Council • Laiki Syspeirosi Aristotelis
Education	Project-related education and training	<ul style="list-style-type: none"> • President of Primary Education of Municipality of Aristotelis • President of Secondary Education of Municipality of Aristotelis
Religious Institutions	Host community	<ul style="list-style-type: none"> • Ierissos and Mt. Athos Metropolis (Archbishop Theoklitos, Arnaia)
Professional Bodies (Business Organizations)	Host community; Potential contractors and suppliers; Interplay between tourism and mining	<ul style="list-style-type: none"> • Business Association of Stratoni • Business Association of Arnaia • Business Association of Olympiada • Business Association of Megali Panagia • Business Owners Association of Stavros • Association of Business & Industry of Ierissos "Profitis Elias" • Union of Rental Rooms Owners of the Municipality of Aristotelis • Hotel Owners of Stratoni, Megali Panagia, Olympiada, and Arnaia • Contractors of Paleochori, Stratoni, Olympiada, Arnaia, Megali Panagia, and other local communities • Suppliers of Paleochori, Stratoni, Ierissos, and other local communities
Communities	Host community; Interest in employment; Interest in environmental and social issues	Households and communities that may be directly or indirectly affected by the Project and its activities. This includes people living on the Project site through direct land take or affected by E&S impacts, and other people who visit or use land or resources that may be affected. The communities in the Social Aol are presented in Table 2.3-1 and Table 4.2-1.
Women's Associations	Host community; Potential participation in community development programs	<ul style="list-style-type: none"> • Women Association of Ierissos • Women's progressive movement of the Municipality of Aristotelis (Megali Panagia) • Women Association of Paleochori – Panagia I Gorgoipikoos • Women's association of Varvara, 'Dryades' • Women Association of Stratoni • Women Association of Stratoniki – Stageira • Women Association of Arnaia • Women Association of Neochori
Cultural Associations	Host community; Potential participation in community development programs	<ul style="list-style-type: none"> • Company for culture and tradition of Megali Panagia • Cultural Association Develikiou (Megali Panagia) • Arnaia Cultural and Training Society • Cultural Association of Neochori • Cultural Association of Varvara residents in Thessaloniki • Cultural Association of Paleochori (Kasteli) • Cultural Association of Paleochori (Zorba)

Stakeholder Category	Interest in the Project	Stakeholder Groups
		<ul style="list-style-type: none"> • Cultural Association of Ierissos • Cultural Association of Stratoniki • Cultural Association of Stratoni
Sports Associations	Host community; Potential participation in community development programs	<ul style="list-style-type: none"> • Sea-Sports Association of Stratoni • Thyella Sport Association (Stanos) • Sport Association of Megali Panagia, Hercules • Equestrian Association of Megali Panagia • Apollon Arnaia Football Club • Sport Association of Paleochori • Sport Association of Neochori • Sport Association of Varvara • Sport Association of Stageira-Stratoniki • Sport Association of Stratoni • Nautical Athletic Club of Stratoni • Asteras of Northern Halkidiki • MAO Stratoni the Kassandra Mines (football association, Stratoni) • Stratoni Sports Athletic Association • Paleochori Sports Association, 'Aris' (Paleochori) • TAE KWON DO Sports Association of Neochori 'Aristotele' (Neochori) • M.A.O. Alexander the Great of Neochori (football association) (Neochori)
Health	E&S impacts related to health; Project reliance on health services	<ul style="list-style-type: none"> • Paleochori Public Medical Centre • Local Medical Centre under the administration of Paleochori Medical Centre • Medical Centre Stavros
Civil Protection	Impacts of the Project on local safety; civil unrest; emergency planning	<ul style="list-style-type: none"> • Local Police of Arnaia • Local Police of Stavros • Fire Brigade of Stavros • Fire Brigade of Arnaia • Fire Brigade of Ierissos
Local (community-level) Opposition Groups	Interest in environmental and social issues	<ul style="list-style-type: none"> • Antigold - Representatives of Megali Panagia • Antigold - Representatives of Ierissos • Friends of Environment Ierissos Association • Association of Business & Industry of Ierissos "Profitis Elias" • Association of Fishermen of the Municipality of Aristotelis 2020 • Forest Operation Company Stratoniki – Ierissos • Stockraising Association of Halkidiki • Active Citizens of Olympiada
Vulnerable groups	Disproportionate E&S impacts on vulnerable groups; capacity to access Project benefits	According to EBRD PR 1, people or groups of people who may be more adversely affected by Project impacts than others by virtue of characteristics such as their gender, gender identity, sexual orientation, religion, ethnicity, indigenous status, age (including

Stakeholder Category	Interest in the Project	Stakeholder Groups
		children, youths and the elderly), physical or mental disability, literacy, political views, or social status. Vulnerable individuals and/or groups may also include people in vulnerable situations (see further details in Section 4.2.3, Vulnerable Groups).
Local Media	Communication of Project-related information	<ul style="list-style-type: none"> • Newspapers • Radio • Television • Social Media
Internal Stakeholders		
Workers	Interest in employment Workers' rights and labour conditions	<ul style="list-style-type: none"> • Workers employed in Hellas Gold
Mining workers unions	Workers' rights and labour conditions Interest in employment	<ul style="list-style-type: none"> • Surface Workers' Trade Union "Agia Varvara" (about 540 members) • Trade Union of Kassandra Mines Underground Miners (about 350 members) • Trade Union of Kassandra Mines Underground Miners "Shaft 59" (about 150 members)
Contractors and Suppliers	Interest in procurement opportunities; Workers' rights and labour conditions	<ul style="list-style-type: none"> • Contractors involved in the Project • Suppliers involved in the Project

5.2.1 Vulnerable groups and gender considerations

Hellas Gold ensures stakeholder engagement techniques are appropriate to the culture, social dynamics and the existence of pre-existing or project-induced vulnerabilities. Vulnerable people or groups are those who may be more adversely affected by Project impacts than others by virtue of characteristics such as their gender, gender identity, sexual orientation, religion, ethnicity, Indigenous status, age (including children, youths and the elderly), physical or mental disability, literacy, political views, or social status. Vulnerable individuals and/or groups may include, but are not limited to, people living below the poverty line, the landless, single headed households, natural resource dependent communities, migrant workers, refugees, internally displaced people, or other displaced persons who may not be protected through national legislation and/or public international law.

Table 5 provides an overview of the groups that may be considered vulnerable, based on screening and engagement activities conducted to-date. The Project will take special steps to facilitate access for such groups and provide them with the opportunity to engage in informed discussion about the Project and their interactions with it. In the social Area of Interest (Aoi), no indigenous, refugee, minority, religious, or migrant groups have been identified.

Table 5: Potentially Vulnerable or Marginalised Groups in the Social Aoi

Vulnerable Group	Description and Relationship to the Project
Women and particularly female heads of households, widows, and divorcees	<p>Due to the nature of traditional and domestic relations, women may be reliant on the male members of the family for financial support and participation in public decision-making. Women have fewer employment opportunities and mostly work in low-income, part-time or informal jobs. Women heads of household are more often vulnerable due to reduced access to financial resources and reduced voice in public decision-making.</p> <p>Due in part to traditional gender roles, as well as risks of higher vulnerability of women, GBVH is an issue in Greece.</p> <p>Women/female heads of household have been identified as being vulnerable within the AoI. They are less able to access employment and economic benefits of the Project, and may be susceptible to changes in the security context.</p>
Youth (18–24), as defined by the United Nations	Youth may be vulnerable in terms of access to assets, education, or employment opportunities. Youth are present throughout the AoI.
Elderly (men and women) and retired	Retired and/or elderly members of the community may have minimal/fixed income and are more likely to have reduced capacity to cope with changes to their environment. Elderly/retired persons are present in the AoI.
Low-income Households	Low-income households have fewer resources on which to rely and are less likely to have savings and/or access to credit, which makes them vulnerable to shocks and change. Low-income households are present in the AoI.
Physical/mental health and disability	Those who lack physical mobility or who have mental health issues may be vulnerable to changes and unable to participate in decision-making, or those with underlying health issues that may be more sensitive to environmental changes.

Measures to support engagement to be more gender inclusive will vary depending on the Project context; however, examples of such methods to be applied include:

- Hellas Gold will seek to establish a gender balance within the stakeholder engagement and community liaison team
- Hellas Gold will aim to use existing forums and methods of engagement used by different genders, including informal ones where participants may be more comfortable sharing information and views. Hellas Gold will engage with civil society organisations that might provide a forum for, or insight into, the best avenues for engagement with specific groups.
- Hellas Gold will consider the timing of paid work, livelihood activities, childcare, and other household duties in planning engagement so that the process can be more inclusive.

Hellas Gold will continuously engage with local leaders, organizations, associations, authorities, members of the Community Interaction Committee (CiC), and local NGOs to understand and identify those who might be considered vulnerable within the community. All meetings with vulnerable groups or their representatives will be documented in the Stakeholder Engagement Masterfile. The CiC, CLO's, the Community Office and Grievance mechanism will serve as the official communication channel for Hellas Gold to address vulnerability issues within local communities.

To facilitate the participation of vulnerable groups, the following approaches will be used:

- **Simplified Language:** Information will be provided in accessible formats, using clear and simple language to explain complex topics. Technical terms will be avoided. Key points will be illustrated with diagrams, infographics, and videos. Alternative formats, such as large print and audio recordings, will also be available.
- **Multiple Channels:** A variety of communication channels will be utilized, including community meetings, social media, and printed materials, to ensure information reaches different groups.
- **Prioritized Engagement:** Requests for engagement, feedback, Hellas Gold processes, and grievances will be given priority by the stakeholder engagement team. Community Liaison Officers (CLOs) will be mobilized immediately to the agreed meeting point for further communication when requested.

5.3 Engagement methods

Different engagement methods will be considered and selected, based on the characteristics of the stakeholders and needs of Hellas Gold and align with the key objectives outlined in Section 1.2. The different types of engagement methods are presented below and in Table 5; these will be adapted as required. All engagement mechanisms will be 'culturally appropriate' and tailored to the stakeholders needs.

5.3.1 Project community office and local presence

In July 2023 Hellas Gold opened a community office in Palaiochori (see Figure 3). It allows residents to meet members of the Hellas Gold community liaison team and ask questions, submit grievances, and access other information, such as applications for posted positions or supplier qualifications.

In addition, the Hellas Gold Community liaison team are actively present in the local communities for ad-hoc meetings and discussions.

Figure 3: Community office in Palaiochori



5.3.2 Community of Interest Committee (CIC)

The CIC was established in June 2023 and is covered by a CIC Framework that defines the governance for the committee, including membership criteria, the members selection process, members roles and responsibilities and code of conduct.

The aims of the CIC are to:

- Provide a platform for the exchange of information, knowledge and expertise
- Provide a space for consultation and structured dialogue, to support prevention and resolution of disputes
- Provide a mechanism to foster greater understanding of the Kassandra Project's host environment and a reciprocal understanding of the companies' policies and activities
- Ensure transparency regarding the HG Community Development Plan and supporting Community Investment Plan
- Access local knowledge and expertise

The CIC does not serve as an Advisory Committee, however, all matters raised in the CIC will be considered and will support revision of Hellas Golds stakeholder engagement program, as well as business planning and decisions.

The committee comprises of around fifteen individuals, with representation from different interest groups and stakeholder bodies including but not limited to municipal, business, vulnerable, civil society from the social area of interest. Hellas Gold will promote maximising the committees' gender

diversity and representation of individuals, groups/associations that support or are classified as vulnerable.

The planned program of the CIC is provided below:

- Annual report of the CIC activities: this is prepared by an external company that provide CIC secretariat support. The report is issued by the end of 1Q each year
- Annual CIC meeting: focuses on a review of the previous years activities and the planning of the forthcoming year's priorities
- Quarterly meetings: minutes of meetings are issued after every quarterly meeting and provided on the Hellas Gold website: <https://www.hellas-gold.com/en/sustainability/corporate-social-responsibility/reviews-reports>

SEP-CT-02: Undertake quarterly CIC meetings, prepare minutes of meeting and disclose on the Hellas Gold website

SEP-CT-03: Prepare annual CIC report and annual planning meeting with the CIC in 1Q each year.

5.3.3 Other engagement methods

Table 6 below provides an overview of the other engagement methods that are adopted, being led by the Hellas Gold community liaison team.

Table 6: Engagement methodologies

Method/ Issue	Description	Target	Frequency	Supporting Materials
External Stakeholders				
Open Houses	Open Houses or Community Information Sessions will be hosted in key communities of the Aol. These events will provide a place where members of the community, stakeholders and the general public can learn about the Project.	<ul style="list-style-type: none"> • All stakeholders • Communities in the Social Aol 	Ad-hoc events	Posters and brochures presenting Project information
Site Visits	Site visits organized for information purposes with a small number of key stakeholders.	<ul style="list-style-type: none"> • Community leaders & stakeholder representatives 	Periodically, as required	Site visit specific information packs
In-person engagement	<p>One-on-one meetings, group meetings, and presentations to groups with the Project, including:</p> <ul style="list-style-type: none"> • Focus group discussions, with specific sessions for vulnerable or marginalized groups when required and appropriate. • Targeted key stakeholder engagement to discuss specific, technical and/or sensitive issues. <p>These meetings will be consultative sessions to identify interests, concerns</p>	<ul style="list-style-type: none"> • Stakeholders who are potentially affected by the Project or who represent key stakeholder interests 	Engagement through Project construction, operation, and closure	Hand-out material such as brochure describing the current status of the Project

Method/ Issue	Description	Target	Frequency	Supporting Materials
	and recommendations as well as provide feedback.			
Distribution of Project Information	The Project will prepare communication and information material to support engagement. These materials will allow the Project to present and display information at a broad selection of events. Materials will be succinct, non-technical and easily accessible, and will be updated periodically to reflect Project status and stakeholder priorities.	<ul style="list-style-type: none"> • General public • Stakeholders in Aol communities 	Ad-hoc	Printed copies of: <ul style="list-style-type: none"> • Project information pamphlets • Printouts and newsletters updating on the current status Project implementation
Community Investments	The Project has developed a strategic Community Development Plan supported by and Community Investment Plan, to align with community needs and priorities, as well as Project objectives. The main mechanism for stakeholder input into the program is via the CIC or direct engagement with Hellas Gold via its website (https://www.hellas-gold.com/en/sustainability/corporate-social-responsibility) Or via the Community Liaison team.	<ul style="list-style-type: none"> • Stakeholders or entities that are interested in submitting a request or proposal for a community investment project. 	Ongoing	Report on community investment and CSR in Hellas Gold Sustainability/ESG Report Quarterly publicly available reports CIC meetings Website
Local Participation in Field Studies/ Research	By engaging local stakeholders in Project-related research and field studies, the Project will endeavour to increase transparency and trust in the Project. Providing research funding or grants to stakeholder groups may also provide insights to key environmental effects of the Project.	<ul style="list-style-type: none"> • Stakeholders who are potentially affected by the Project or who represent key stakeholder interests • Academic community 	Ad-hoc	Not applicable
Traditional Media Relations & Advertising	The Project has established a media relations strategy and plan for both traditional media (e.g., print, radio) and social media (e.g., Facebook, Twitter, YouTube, LinkedIn, Website) that outlines a recommended media approach, protocols and systems to establish how the Project interacts with media.	<ul style="list-style-type: none"> • All stakeholders 	Ongoing	Press release and media updates on the Project implementation
Emergency response and crisis management	Collaboration between Hellas Gold, community and competent authorities to support the initiatives required during emergency response	<ul style="list-style-type: none"> • Competent authorities, community representatives 	Ad-hoc	Crisis and emergency response management plans and

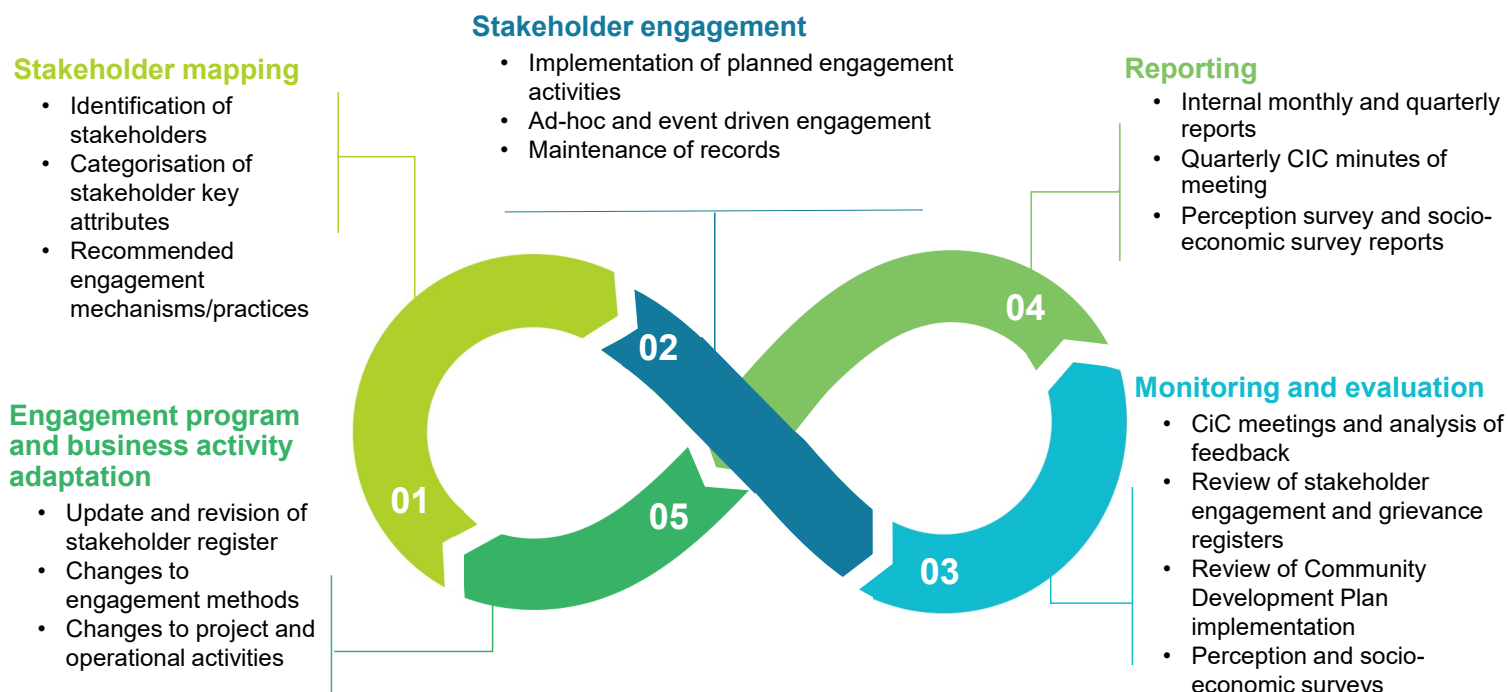
Method/ Issue	Description	Target	Frequency	Supporting Materials
		and affected stakeholders		processes
Hellas Gold website	External reporting of the environmental monitoring program results via a web portal (https://environmental.hellas-gold.com/) that provides public access to the comprehensive environment monitoring data.	<ul style="list-style-type: none"> All stakeholders 	Ongoing	Website
Interactive Website	The Project will develop and maintain a web-based Project interactive platform that will allow the public to view interactive maps and updates on the Project. The site could be built as a microsite and linked to the main Hellas Gold website.	<ul style="list-style-type: none"> All stakeholders 	Ongoing	Interactive website
Grievance Mechanism	<p>Separate worker and 3rd party grievance processes and procedures have been established that recognize and prioritise Gender Based Violence and Harassment grievances.</p> <p>In each quarterly CIC meeting updates on new and the status of existing grievances is provided.</p> <p>The Project will consolidate a quarterly report on the grievance mechanism, including total number and types of grievances received, as well as responses; the report will be made available to CIC members.</p>	<ul style="list-style-type: none"> CIC All stakeholders 	Quarterly	Quarterly report

6 Monitoring, Evaluation and Reporting

To support the continued relevance and effectiveness of the Hellas Gold stakeholder engagement program, a systematic approach with a feedback loop is undertaken to support the adaptation and change in the program elements (see Figure 4).

Compliance tasks to support implementation of this plan have been developed and appear in italics.

Figure 4: Overview of stakeholder monitoring, evaluation and report feedback mechanism



Key aspects of the monitoring and evaluation activities include:

- CIC meetings and analysis of feedback. The CIC provides Hellas Gold with a valuable and diverse insight into the community issues and profile of Hellas Gold. The community liaison team use the CIC meetings and interactions with its members to evaluate all aspects of Hellas Golds activities (not just the CIC meetings and program) in conjunction with other Hellas Gold teams e.g. the review of the environmental monitoring program that includes community monitoring of noise, air and water quality or planning of road transportation route and timing
- Separate stakeholder and grievance registers are maintained to ensure that responses to complaints, enquiries and requests for information are:
 - Within the planned timescale, appropriate and consistent with the nature of the issue and the involved party, conforming with the governance documentation
 - Evaluated internally to assess trends, supporting feedback and reporting to internal teams
- The implementation of the Community Development Program and the extensive

engagement with project beneficiaries, implementing partners and competent authorities impart key information on community needs and concerns that is used to influence and shape the engagement and communications programs

- Perception surveys include interfaces with internal and external stakeholders. Its is used to assess the communications and stakeholder engagement program and shape the following year's plans. A perception survey includes stakeholders from the Social Aol and is undertaken using a combination of methods (e.g. Intranet, phone calls, face to face interviews, etc.). Perception surveys will be completed in 2024 and 2025 during the peak of the Skouries project construction. In 2026 the frequency and scope will be evaluated to determine the program. The Hellas Gold communications team will undertake a perception survey to support the planning and evaluation of their program, this will also provide input to the stakeholder engagement program
- Every three years, a socio-economic survey will be undertaken. This will be used to support several aspects of the stakeholder engagement program, including mapping of stakeholders, insight into community priorities and concerns, as well as business and labour market conditions. The survey will be designed to include an assessment of the living standards of affected people/ households and businesses (formal or informal), their sources of income/livelihoods, their access to services and infrastructure and their social networks.

Reporting initiatives associated with the stakeholder engagement program include and combination of internal and extern reporting activities:

- Internal reports, led by the community liaison team to support analysis of data and governance performance
- CIC annual and quarterly reports and quarterly minutes of meeting
- Perception and socio-economic survey reports

The results of the monitoring, evaluation and reporting activities support the adaption of the stakeholder engagement program. Aside from the review and revision of this Plan, updates to parts of the program are made on a continuous basis to strengthen and improve its elements. In addition, based on stakeholder feedback and internal Hellas Gold assessment, changes to business planning decisions are made.

Hellas Gold will track Key Performance and Compliance Indicators (see Table 7) to assess the effective implementation of the Stakeholder Engagement Plan during construction and operation.

SEP-CT-04: *Preparation of an internal quarterly report providing output from stakeholder engagement and grievance management activities, including legal engagement register.*

SEP-CT-05: *Completion of perception surveys in 2024 and 2025.*

SEP-CT-06: *Every three years completion of a socio-economic survey*

Table 7: Stakeholder Engagement Plan Key Performance Indicators

ID	Topic	Method	Periodicity/ Trigger	Key Performance and Compliance Indicators	Target
SEP-KPI-1	Planning	Stakeholder mapping	Annual	Using the output of the CIC annual report and internal reports, a review and revision of the stakeholder engagement register will be completed and the annual engagement plan prepared	100% for all operational and construction sites
SEP-KPI-2	CIC	Minutes of meeting preparation and disclosure	Quarterly	The minutes from each CIC quarterly meeting will be issued and disclosed on the Hellas Gold web site	100% each quarter
SEP-KPI-3	CIC	Annual meeting and report	Annual	Prepare annual report (issued by end of 1Q) and undertake an annual planning meeting with the CIC members	Annually
SEP-KPI-4	Internal reporting	Quarterly internal report	Quarterly	Report on implementation and outputs from the stakeholder engagement program and 3 rd party grievance system, including a review of the legacy engagement register	Quarterly
SEP-KPI-5	Perception surveys	External/Internal perception surveys	Annually in 2024 and 2025	Completion of stakeholder perception surveys to collate feedback on community views and opinions	Annual in 2024 and 2025, future frequency to be defined in 2026
SEP-KPI-6	Socio-economic surveys	Socio-economic survey to support assessment of stakeholder	Every three years	Completion of socio-economic survey to support an assessment of community priorities and concerns as well as feedback on Hellas Gold community focused programmes	Every three years

7 Training

Hellas Gold has developed a formal training needs analysis, to define the necessary sustainability awareness and training required at each level and function of the site. This includes workers, contractors, supervisors and managers.

New hire employees and contractors are provided with a general sustainability induction training before commencing work, coordinated by the Hellas Gold Training Team, it includes information on the stakeholder engagement, grievance mechanism and expectations associated with community behaviour.

Hellas Gold also identifies other training areas and specific technical/vocational and on-the-job training required for specific jobs roles, to build employee capacity in specifically identified fields of work.

Appendix 1: Stakeholder Data Privacy Notice

The company with the corporate name HELLAS GOLD Mines and Gold Industry S.A." [23A Vas. Sofias Ave., Athens, GR-10674, Tel. 30 214 687000 (hereinafter the "Company") collects and further processes personal data to manage communications with its stakeholders.

To promote the active involvement of the local community and stakeholders in recording all environmental impacts and social parameters of development projects which the Company undertakes to carry out, all stakeholders at local and international level are provided with information about the planning and implementation of each project.

Moreover, the Company receives requests from the its stakeholders (social partners and interested third parties) concerning its implementation of strategic [Corporate Social Responsibility \(CSR\)](#) actions and initiatives and concerning the promotion of parallel economic growth. Furthermore, the Company collects and records requests for donations or grants submitted by the stakeholders.

Lastly, the stakeholders can submit confidential reports ("grievances") via the [Grievance Mechanism](#) which concern the activities and compliance of the Company or individual employees with laws, governmental regulations, health and safety rules or the Code of Business Conduct and Ethics.

In these cases, personal data is processed in accordance with the points set out below in this Notice:

1. Data Controller

The Company is the data controller responsible for all processing carried out:

1. when managing two-way communication between stakeholders and the Company;
2. when requests are submitted in the context of Corporate Social Responsibility (CSR);
3. when grievances are submitted via the Grievance Mechanism.

2. Communication about personal data issues

You can use the email address below to exercise your statutory rights (see point 7 below), to ask questions, or for any other reason relating to the processing of personal data described in this Notice: GR-Privacy@eldoradogold.com.

3. Which personal data is processed?

When the Company communicates with stakeholders, personal data is processed as follows:

- **Managing communication with stakeholders to promote active participation in highlighting the parameters and impacts of development projects**

At this stage, we process the following personal data:

1. Surname-Name
2. Father's Name
3. Email address
4. Home address

5. Mobile number
6. Any other personal data which may be disclosed when contacting the Company.
- **Submitting applications for social responsibility projects**

In addition to the above, when submitting an application for a social responsibility project using the [form](#), the following data is processed:

1. Surname-Name
2. Tax ID No.
3. Home address
4. Contact Tel. No.
5. Email address
6. Category of request
7. Description of the request
8. Any other personal data disclosed by the applicant when submitting the form.
- **Submitting a grievance via the Grievance Mechanism**

In addition to the above, when submitting a grievance via the [form](#) the following data is processed:

1. Surname-Name
2. Gender
3. Age
4. Home address
5. Postal address
6. Contact Tel. No.
7. Email address
8. **Contact phone number of the relative of the person submitting the report**
9. **The date of the incident**
10. **Any other personal data which may be included in the description of the incident.**

During final evaluation of requests submitted, we process all information provided at the time of submission, as well as the following data:

1. Data entered in the form relating to persons other than the applicant.
2. Data included in the documents submitted to prove the facts set out in the application form.
4. Purpose and legal basis for processing personal data

The purpose for which we process data is to support the active involvement of the stakeholders via two-way communication, to record the impacts of development projects being implemented by the Company, to bolster Corporate Social Responsibility (CSR), and to promote parallel economic growth, as well as to effectively investigate and address grievances submitted by third parties.

The legal basis for processing personal data is either: A) the taking of measures at the Data Subject's request before signing a contract (Article 6(1)(b)(b) of the GDPR); B) compliance with a legal obligation of the Controller deriving from Law 4403/2016 on corporate responsibility (Article 6(1)(c) of the GDPR); or C) the legitimate interest pursued by the Controller which entails performance of its contractual obligations, to ensure company compliance with company policies and to showcase its corporate social responsibility activities (Article 6(1)(f) of the GDPR), whichever is appropriate. Special categories of personal data are only processed when voluntarily disclosed by stakeholders themselves (Article 9(2)(e) of the GDPR).

5. Personal data retention period

Your personal data will be retained for a period of one (1) year from the date on which it is provided to us and will be deleted - destroyed after that period elapses. If you want your personal data to be held for a longer period of time, please expressly state this when submitting your request. Note that under no circumstances will we retain your personal data for a period of more than two (2) years.

6. Disclosure and transmission of personal data

Your personal data is processed by the Company's authorised staff.

Moreover, your personal data becomes accessible to:

1. the website hosting service provider (if you submit your request via it);
2. the grievance mechanism provider.

Those providers have provided assurances about how your personal data will be safeguarded.

Lastly, depending on the nature of your request, your personal data may be disclosed to other companies in the Eldorado Group inside or outside the European Economic Area (EEA) (in countries for which the European Commission has issued an adequacy decision).

7. Rights

You can exercise the following rights by sending a request to that effect to the email address cited in point 2 above:

1. The right of access: You can request information about data processing and copies of the data we hold.
2. The right of rectification: You can request that errors, inaccuracies and data shortcomings be corrected.
3. The right to erasure: Under certain conditions laid down in the legislation on the protection of personal data, you can request that your data be deleted.
4. The right to restrict processing: You can request that we restrict the processing of personal data where you have doubts about its accuracy, and in the case where the data is no longer necessary for the initial purpose of processing, but for legal reasons cannot yet be deleted.

5. The right to object: You can object at any time to the processing of personal data that relates to you.
6. The right to data portability: You can request that we transfer your data to another organisation or that we send it to you.

If you are not satisfied with the response to your request or consider that the processing of your personal data violates the applicable regulatory framework, you are entitled to submit a complaint to the Hellenic Data Protection Authority (postal address: 1-3 Kifissias Ave., Athens, GR-11523, Tel. 210 6475600, email: contact@dpa.gr).











HG Stakeholder Engagement Plan_HG-01-S-TA M-0008-B-ENG

Final Audit Report

2024-10-06

Created:	2024-09-18
By:	Eleanna Touri (eleanna.touri@eldoradogold.com)
Status:	Signed
Transaction ID:	CBJCHBCAABAAEvr8vzfAapllfvaiKBeD4MGzKIZWuxV3

"HG Stakeholder Engagement Plan_HG-01-S-TAM-0008-B-ENG" History


-  Document created by Eleanna Touri (eleanna.touri@eldoradogold.com)
2024-09-18 - 10:31:58 AM GMT- IP address: 194.219.153.14
-  Document emailed to ioannis.papakostas@eldoradogold.com for signature
2024-09-18 - 10:34:26 AM GMT
-  Email viewed by ioannis.papakostas@eldoradogold.com
2024-09-18 - 10:37:12 AM GMT- IP address: 104.47.75.190
-  Signer ioannis.papakostas@eldoradogold.com entered name at signing as Ioannis Papakostas
2024-09-18 - 10:37:40 AM GMT- IP address: 195.167.64.138
-  Document e-signed by Ioannis Papakostas (ioannis.papakostas@eldoradogold.com)
Signature Date: 2024-09-18 - 10:37:42 AM GMT - Time Source: server- IP address: 195.167.64.138
-  Document emailed to mathieu.vallart@eldoradogold.com for signature
2024-09-18 - 10:37:43 AM GMT
-  Email viewed by mathieu.vallart@eldoradogold.com
2024-09-19 - 1:43:30 PM GMT- IP address: 172.226.126.3
-  Signer mathieu.vallart@eldoradogold.com entered name at signing as Mathieu Vallart
2024-09-19 - 1:43:59 PM GMT- IP address: 138.84.35.13
-  Document e-signed by Mathieu Vallart (mathieu.vallart@eldoradogold.com)
Signature Date: 2024-09-19 - 1:44:01 PM GMT - Time Source: server- IP address: 138.84.35.13
-  Document emailed to robert.stocki@eldoradogold.com for signature
2024-09-19 - 1:44:02 PM GMT

 Email viewed by robert.stocki@eldoradogold.com

2024-09-19 - 1:59:19 PM GMT- IP address: 52.102.12.245

 Signer robert.stocki@eldoradogold.com entered name at signing as R. Stocki

2024-09-19 - 2:00:11 PM GMT- IP address: 195.167.64.138

 Document e-signed by R. Stocki (robert.stocki@eldoradogold.com)

Signature Date: 2024-09-19 - 2:00:13 PM GMT - Time Source: server- IP address: 195.167.64.138

 Document emailed to francisco.ballesteros@eldoradogold.com for signature


2024-09-19 - 2:00:15 PM GMT

 Email viewed by francisco.ballesteros@eldoradogold.com

2024-09-23 - 5:11:15 PM GMT- IP address: 104.47.75.254

 Email viewed by francisco.ballesteros@eldoradogold.com

2024-10-06 - 0:57:20 AM GMT- IP address: 189.216.141.133

 Signer francisco.ballesteros@eldoradogold.com entered name at signing as FRancisco Ballesteros

2024-10-06 - 0:58:03 AM GMT- IP address: 189.216.143.187

 Document e-signed by FRancisco Ballesteros (francisco.ballesteros@eldoradogold.com)

Signature Date: 2024-10-06 - 0:58:05 AM GMT - Time Source: server- IP address: 189.216.143.187

 Document emailed to louw.smith@eldoradogold.com for signature

2024-10-06 - 0:58:06 AM GMT

 Email viewed by louw.smith@eldoradogold.com

2024-10-06 - 2:05:08 AM GMT- IP address: 104.28.130.39

 Signer louw.smith@eldoradogold.com entered name at signing as Low Smith

2024-10-06 - 3:00:23 AM GMT- IP address: 79.103.149.93

 Document e-signed by Low Smith (louw.smith@eldoradogold.com)

Signature Date: 2024-10-06 - 3:00:25 AM GMT - Time Source: server- IP address: 79.103.149.93

 Agreement completed.

2024-10-06 - 3:00:25 AM GMT