



Kassandra Mines Project

Third Party Grievance Management Procedure







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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
SEP	Stakeholder Engagement Plan
GMF	Grievance Management Framework

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HELLAS GOLD reserves the sole and exclusive right to interpret and apply this framework in the manner HELLAS GOLD Management deems appropriate. HELLAS GOLD further reserves the right to change, modify, or revoke procedures or guidelines associated with this framework at any time, and in any manner deemed appropriate. This plan supersedes the previous Labour Management Framework and any previous materials on this subject matter.

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1. Introduction

The purpose of this Third-Party Grievance Procedure (“grievance procedure”) is to address, manage and resolve grievances, concerns, complaints raised by stakeholders related to the construction and operation activities of HG and its Contractors and to establish a consistent reporting mechanism on management of construction and operation issues.

For the purposes of this document the CLC will have, also, the role of Grievance Advisor. The term Grievance Coordinator will be used, hereinafter.

1.1 Grievances vs Requests

The Company and its Contractors recognizes that its activities will lead to different interaction with stakeholders and as such this procedure makes a distinction between the following concepts and each is briefly defined below:

Term	Definition
Grievance	A real or perceived impact submitted by an individual, group or community resulting from Company and Contractors’ activities or operations
Compliant	Feelings of discontent experienced by an individual, group or community
Concern	An issue arising from Company and Contractors’ activities or operations, which has the potential to cause an impact to an individual, group or community
Request	Solicitation of information related to Company and Contractors’ activities or operations.
Complainant	Stakeholder or Person or Community affected by the Project who expresses a grievance

All incoming grievances, by all submission channels, complaints and concerns will be recorded, tracked, and managed by the Grievance GBVH focal point (female) for the first contact & review. If the Grievance is related with a GBVH complaint, an appropriate male or female GBVH focal point will be assigned and in agreement with the complainant. If the received Grievance is not related to GBVH issue the Grievance will be forwarded to the Grievance Coordinator and CLCs.

The collected complaints - through the grievance procedure presented in this document - are related, only, to Company and Contractors’ activities or operations.

1.2 HG Grievance vs Contractor Grievances

For the purposes of clarity: HG is responsible for managing grievances and complaints resulting from its activities. The Contractor is responsible for managing third party grievances resulting from their construction activities:

- a) works and services provided by the Contractor and related to construction of building, structures, facilities, arrangement of surrounding area, etc. as defined in Contractors' Scope of Work,
- b) all excavations and works related to accompanying works, such as ground preparation and earthworks, access road upgrade/construction, spoil disposal sites, quarries and key roads linking the site,
- c) community interactions,
- d) stakeholder engagement activities, undertaken by the Contractors.

For grievances connected to working relations, see the Worker Grievance Management Procedure.

The Third-Party Grievance Mechanism is accessible to the general public, residents of affected communities, Project-Affected Persons (PAPs), institutional stakeholders, and all categories of contractors, suppliers, and service providers. Additionally, HG's Third-Party Grievance Mechanism is available for use by any contractor, supplier, or service provider who either lacks their own grievance mechanism or prefers to utilize HG's mechanism.

1.3 Grievance Categories

To assist the Grievance Coordinator in correctly assessing and escalating grievances to the correct work-streams the following grievance categories have been identified:

- **Technical and Design Assurance and Support:** these grievances will result from engineering design planning activities which have a potentially negative impact on stakeholders.
- **Construction:** Grievances related to dust, noise, vibration and any damages caused during construction.
- **Land Easement and Acquisition (LEA) Requests:** these grievances will result from additional land take activities, which possibly the Company and/or Contractors would undertake, if needed
- **Social Conduct in the Communities:** these grievances will result from unfavorable interactions between Company and Contractors' employees in the community environment.
- **Community Safety and Security – Transport:** these grievances will result from transport related activities.

- **Community safety and security – Accommodation:** these grievances will result from activities taking place around the Contractor camps or Contract accommodation and wherever Contractor's employees are commuted or gathered.
- **HSSE Incidents:** any event which leads to or had the potential to lead to injury, loss of life, damage to assets (including non-HG assets) or to the environment. These incidents will be managed directly by Company and Contractors' HSSE In-country Function.
- **Environment:** these grievances will result because of activities deemed detrimental to the local environment and biodiversity.
- **Employment & Industrial Relations:** these grievances will result because of unclear employment practices by Company and Contractor or alleged breaches in employment and Human Rights Practices
- **Stakeholder Engagement:** these grievances will result because of a lack of stakeholder consultation or a general lack of information for community stakeholders.
-
- **Livelihood Restoration Activities:** Grievances related to livelihood impacts and delivery of livelihood restoration programs.
- **Legal and Compliance:** Grievances with legal ramifications for Hellas Gold such as the ones related to the Code of Conduct and ethics.
- **Cultural Heritage:** Grievances associated with the protection of cultural heritage sites.
- **Corporate Social Responsibility (CSR):** Grievances associated with the implementation of CSR activities.

1.4 Multi-Category Grievances

If during the assessment process the Grievance Coordinator determines that a particular grievance fits into more than one grievance category, these additional assessment steps will be followed:

- Double check the assessment with another Grievance Management team member.
- Clearly identify the different categories involved and outline the reasons.
- Register each grievance category as separate grievance (each with its own grievance number) but with the unique code identifying each stakeholder;
- Re-assess the severity and consequence of each grievance (separately); and
- Follow the standard grievance resolution process

By clearly identifying all affected categories, the Grievance Coordinator ensures that each grievance is appropriately investigated by the relevant work-stream.

2. Grievance Management Process

2.1 Channels for submitting a Grievance

Stakeholders will be able to submit a grievance in the following ways:

- By speaking directly to CLCs.
- By calling grievance hotline (23760 25087).
- By submitting grievance through HG site (<https://www.hellas-gold.com/grievance/>).
- By sending e-mail (gr-grievance@eldoradogold.com).
- By sending a letter to the Company (Ελληνικός Χρυσός, Υπόψη τμήματος Εταιρικής Κοινωνικής Ευθύνης, 63082 Στρατώνι Χαλκιδικής).
- By fax to the Company (23760 21081).
- By leaving the grievance into 1 out of 4 boxes have been placed at the entries of HG facilities at Chalkidiki (Skouries, Olympias, Stratoni & Mavres Petres).

In case a worker receives a complaint by a stakeholder, the he/she will inform the stakeholders for the ways of submitting the grievances.

Where necessary, Stakeholders will be assisted by the Grievance Coordinator or CLCs to complete and submit grievance forms or to access information on the grievance management process.

Grievances can be submitted in Greek or English. A stakeholder submitting a grievance may request that its identity be kept confidential unless they represent an organization. The request for confidentiality and the reasons for the request must be submitted with the grievance. All reasonable efforts will be made to maintain the confidentiality requested.

Personal details of stakeholders will not be released to any third party. These details will only be used internally by the Hellas Gold to support the investigation and subsequent resolution of the grievance. In the instance that a grievance involves a specific employee or contractor, personal details of the stakeholder lodging the grievance will not be released to these parties without prior permission.

The Contractor will endeavor to resolve any grievances with stakeholders in good faith, transparently and in a timely manner. It is understood that stakeholders may refer the grievance to a third-party body (i.e. the national judicial system) at any point in the process.

The Grievance hotline is manned Monday – Saturday 7:00AM – 18:00PM by the Grievance Coordinator, however if a stakeholder leaves a grievance (in a voice-message) outside the operating hours or on weekends; the Grievance Coordinator will attempt to contact the stakeholder the following day, to record the details of the grievance. The Grievance Coordinator will attempt to make contact within 3 days of receiving the original message.

For gender based violence and harassment related Grievances (GBVH) , either in connection to workplaces or external communities, HG will have available a separate reporting channel in which a female member of the community relations team will be available to respond to grievances related to GBVH. Such types of grievances will be considered and addressed as high priority. HG Management (General Executive Director, General Operations Manager, Skouries Project Director, HR Manager, Social Performance Director) will be notified for GBVH Grievance submission by email from Grievance Coordinator.

Grievances can be submitted anonymously also.

2.2 Timeframes for resolving Grievances

An acknowledgment of receipt of the grievance will be given within 7 days of receiving the grievance.

The following timeframes are applicable to resolving grievances; these timeframes are commensurate to the severity and consequence level of submitted grievances.

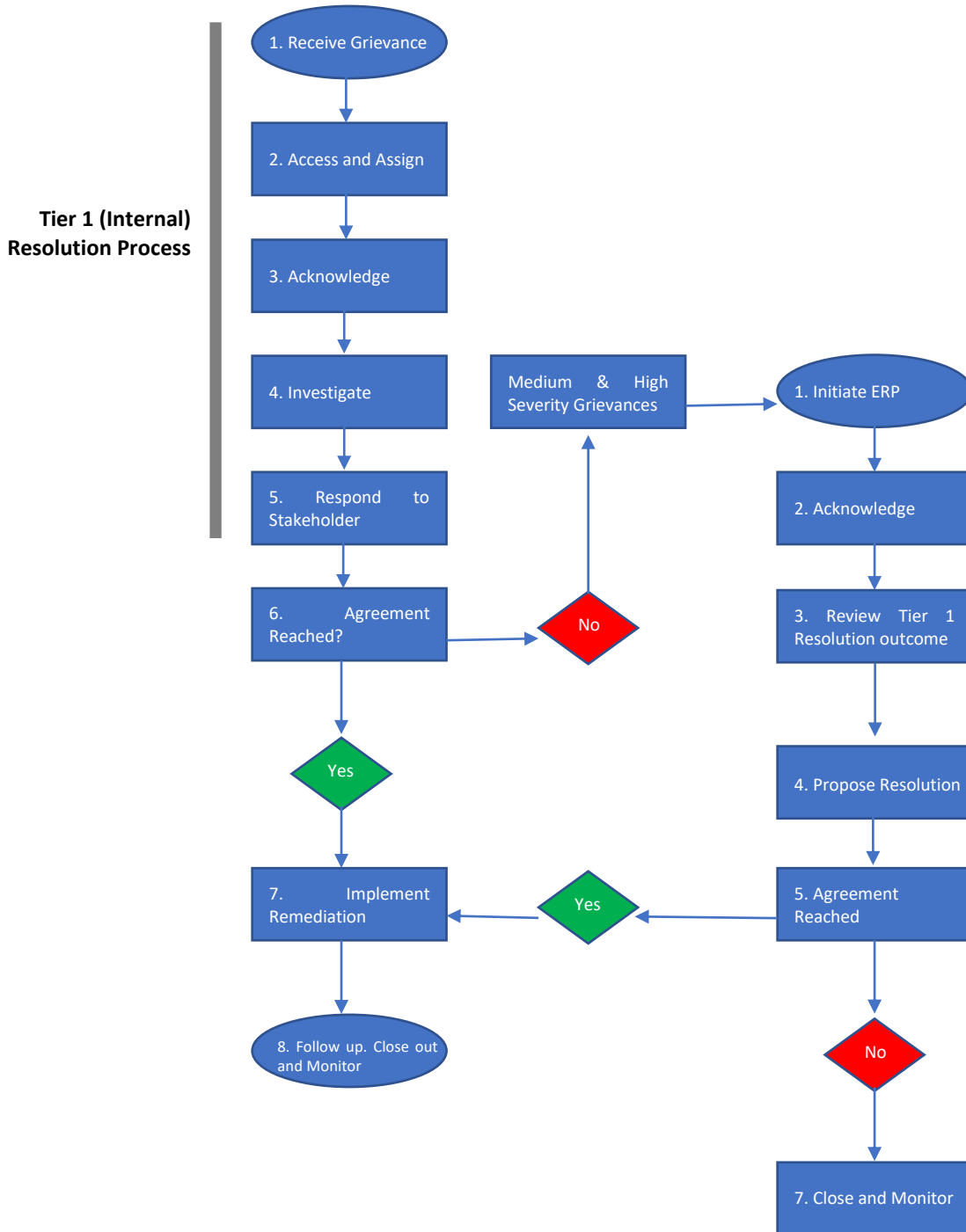
	Timeframe	Responsible
Low	Up to 30 days	Grievance Coordinator
Medium	30 days	Related workstreams, under the supervision of the Construction Manager
High	60 days (depending on complexity)	Project Manager

2.3 Handling incoming Grievances

For any grievances related to Gender-Based Violence and Harassment (GBVH) involving third parties or workers, or any other grievances requiring confidentiality, the Community Office of HG in Paleochori will be closed for the use of the appropriate HG focal point for discussion with the complainant. If an alternative location is required due to accessibility or other factors, a suitable location will be selected with the agreement of the complainant. The engagement and investigation will be carried out in respect with the privacy of the complainant, securing the absence of any audience or employees, as necessitated by the nature of these grievances.

To ensure that all grievances and complaints are properly identified, recorded and addressed in the most efficient way possible; some possible avenues for receiving grievances and complaints are described below. A simplified grievance management process workflow is shown in figure 2.1 below:

Figure 2.1: Grievance Management Process



2.4 Administrative steps for handling Grievances

Figure 2.2 below shows the administrative steps for handling grievances. Each is described in detail below.

1. **Verification:** The Grievance Coordinator will verify if the grievance is related to the project. If the complaint is referring to HG's activities, then he will forward it to HG's Grievance Coordinator. If the grievance is not related to the Construction activities, the Grievance Coordinator will send a rejection letter to the Stakeholder indicating this point. The Grievance Coordinator will also verify the severity of the grievance or complaint and register the grievance or complaint appropriately.
2. **Confirmation of receipt:** For grievances received through email, post, phone, internet online form and fax, the CLC will issue an acknowledgement receipt form within 7 days of receiving a grievance. The acknowledgment receipt will explain the appropriate process to be followed to resolve the grievance and the expected timeframe for the resolution. When possible, the CLC will make a follow up call to the stakeholders the grievance process to be followed.
3. **Register grievances in Grievance database:** The CLC will register all grievances or complaints. Each case will receive a unique registration number in the grievance database to enable tracking. A brief description of the case shall be translated into the English language to allow internal work-stream managers to investigate the grievance. The English translation is also needed for reporting purposes.
4. **Categorizing:** The Grievance Coordinator will categorize each grievance according to:
 - a) Geographical region and location.
 - b) Tier.
 - c) By the work-stream responsible for resolving the grievance.
 - d) By the type of aggrieved party (individual, group, Non-Governmental Organization) etc.
 - e) By the type of grievance and indicate whether frequency of the grievance or complaint.
 - f) By the severity and consequence.
 - g) By the type of grievance and indicate whether frequency of the grievance or complaint, Work-stream responsible for resolving the grievance and responsible staff member
5. The severity and consequence of a grievance or complaint will determine the **resolution process** to be followed. Therefore, it is imperative that the CLC ensures that grievances or complaints are appropriately categorized. Medium and High severity grievances or complaints have a specific resolution process which will be triggered by the severity rating.
6. **Assigning cases to the appropriate work-streams:** The Grievance Advisor will send the grievance or complaint to the relevant work-stream Managers for investigation and resolution. The work-stream Managers will be informed of the applicable timeframes for resolving the type of grievance and the format of the official response required. This procedure is described in figure 2.1.
7. The Contractor will inform HG on the investigation process and resolution outcome of all grievances it addresses. This information will form part of the Grievance monthly, quarterly and annual reporting requirements.

2.5 Logging and communicating Grievance outcomes

When a resolution or remediation measure to a grievance has been reached by the relevant work-stream, the work-stream Manager will send the detail of remediation measure to the Grievance Coordinator to be recorded in the database. The Grievance Coordinator will:

- Immediately discuss the proposed resolution/remediation with the stakeholder.
- If the stakeholder agrees with the proposed remediation process, then the timing of the remediation process will be agreed.
- Send a rejection letter in case a grievance has been assessed as unjustified or has been rejected for any other sound reason. The letter will explain the grounds for rejection.
- If the case is complex and the resolution will take longer than anticipated, inform the stakeholder of the reasons for the delay and indicate when the resolution is expected.
- Analyze whether it is a repetitive grievance and if it is, inform the Grievance management team to trigger appropriate actions to prevent further similar grievances.

The Grievance Coordinator will visit or call the stakeholder (as appropriate) within 1 month of the completion of the remediation measure to get feed-back on the success of the remediation measures in addressing the grievance or complaint. Stakeholders who are not satisfied with the remediation have the possibility to request an additional review process and/or third-party arbitration, through the establishment of an Appeal Committee.

The following timeframes will apply in the grievance administrative process:

Process	Timeframe	Responsible
Acknowledge Grievance	Within 7 days	Grievance Coordinator
Register grievance in database & Acknowledge Grievance	7 days	Grievance Coordinator
Issue grievance rejection letter	10 days	Grievance Coordinator
Issue grievance resolution letter	15 days	Grievance Coordinator
Issue grievance Closure letter	15 days	Grievance Coordinator

2.6 Implementation of remediation measures

The implementation of remediation measures will start immediately after the stakeholder has been consulted about the proposed remediation measure and agreed that they are appropriate. The remediation measures will be implemented by the Company or Contractor – depending on the measure -and shall be completed within agreed timeframes. If financial compensation is part of remediating the grievance, payments shall be made within a maximum 30-day period. The CLC will monitor the implementation process.

If the stakeholder is satisfied with the remediation measure implemented, the CLC confirms the closure of the grievance with the stakeholder and reports it to HG.

2.7 Closing grievance resolution process

When the stakeholder has accepted the proposed resolution and is satisfied with the remediation measure implemented, the Grievance Coordinator will have the stakeholder sign a grievance close out form. Grievance Coordinator will upload the signed agreement as an attachment into the grievance system and the case will be marked as resolved/closed.

Also, there will be closure letters without signature due to technical difficulties or because the stakeholder will not be reachable.

In certain situations, however, HG may “close” a grievance even if the complainant is not satisfied with the outcome. This could be the case, for example, if the complainant is unable to substantiate a grievance, or if there is an obvious speculative or fraudulent attempt.

2.8 Publishing grievance procedure

To ensure that all of its stakeholders are aware of how to access project related information or have the knowledge of how to submit grievances (if required) the following grievance submission information is available:

- Responsible person: Ioannis Papakostas
- Email: ioannis.papakostas@edldoradogold.com
- Address: Stratoni, HD facility site
- Tel: to be provided

2.9 Managing Information Requests

Requests for information received through the grievance process will be managed as follows:

- Requests for general project information – will be sent to HG’s Stakeholder Engagement team.
- Requests for LEA related information - will be sent to HG’ s contact person which will be suggested by the LEA team.
- Request for Construction information – will be sent to the Grievance Coordinator.
- Request for government related information – will be sent to HG Government Affairs or External Communications teams.

3. Monitoring and Reporting

The Grievance Coordinator will send monthly reports about the list and progress of grievances to Project Manager and to the Social Performance Director. Also, the Grievance Coordinator will also be sharing this information with CLCs during their weekly meetings to ensure that compliance and efficiency can be tracked, plus if any issues are picked during the discussions, further engagement can be done with the complainant.


Monthly and weekly reports will be addressed. These will include:

- On weekly basis:
 - Total number and types of grievances received, logged, acknowledged, processed, resolved, and closed.
 - Number of grievances per each category.
 - Number of grievances per location.
 - Number of grievances not completed (and reasons).
 - Number of abended grievances.
- On monthly basis:
 - Number of grievances not completed (and reasons).
 - Number of abended grievances.
 - Number and percentage of grievances solved/not resolved during set time frame.
 - Median days to Closure.
 - Specific issues related to closure of grievances.
 - Number of cases requesting a second review, by an Appeal Committee, or a third-party arbitration procedure.
 - Level of awareness and understanding or comments on the grievance mechanism by stakeholders.

In order the Company to verify that all grievance commitments have been done properly, there will be internal audits by the Social Performance Director. The Social Performance Director will audit the way the procedure has been implemented (on monthly basis), by reviewing the monthly reports and the grievance trends. The CSR & Social Performance Director will be responsible for reviewing the weekly reports.

4. Annex A Grievance form

Third Party Grievance template (English)



Third Party Grievance Submission Form

(To be filled out by complainant and if necessary, completed by CLO/Grievance Coordinator)

All Fields are optional. The Form can also be Anonymously

Contact information

Name	<input style="width: 95%;" type="text"/>
Surname	<input style="width: 95%;" type="text"/>
Gender of Person	<input type="checkbox"/> Man <input type="checkbox"/> Woman
Age of Person	<input style="width: 40%;" type="text"/>
Desired language	<input style="width: 40%;" type="text"/>
	Postal address:
	City / Village / Community <input style="width: 80%;" type="text"/>
	P.C. <input style="width: 40%;" type="text"/>
	Address <input style="width: 95%;" type="text"/>
	Phone <input style="width: 95%;" type="text"/>
	E-Mail <input style="width: 95%;" type="text"/>

Telephone number of a relative / contact person (in case you are not found)

Confidentiality of the reporter:

I request that my identity not be disclosed without my consent*

I want to submit my report anonymously **

* You should be aware that if the report is addressed to another person, the person handling your report should generally disclose the details of the report to that person in order to receive a response.

** In case of anonymous report, we can not contact you for the answer, but we will publish the case and the answer in the annual report and on our website.

Information on the status of the petitioner

Person
 Team
 Society
 Citizens' Social Organization
 Public body (e.g., local government body)
 Other (specify)



REFERENCE DETAILS

Event Date

____/____/20____

Event description:

What happened; Never; Why; Who caused it? What is the result of the problem?

Large text area for event description with horizontal lines.

Frequency / Event Path.

- Individual Incident / Report
- Ongoing
- Repetitive: How many times and when and why?

Text input field for repetitive incident details.

Additional support elements

If possible, provide evidence or any additional information:

Large text area for additional support elements with horizontal lines.

Complainant Name/Signature

Text input field for complainant name/signature.

Date : ____/____/20____

CONSENT TO PERSONAL DATA PROCESSING (GDPR compliance policy)

I the undersigned hereby give my free and absolute consent to processing of my personal data, disclosed by me personally or by my representative (in particular: personal data of the last, first, name; date of birth; gender; contact numbers of communication means, residence address etc.) by Hellas GOLD in the personal database of Hellas GOLD as well as to my next of kin/contact (as provided in this form) by any and all means according to the applicable Country Legislation "On personal data protection". Processing of personal data of Hellas GOLD passengers is aimed at solving the possible grievance submitted by me. I agree that such personal data may also be passed on to other companies working on the project, but only for the purposes of this report, as described above. There will be no other disclosure of data to third parties. I confirm that I have been informed of my rights under Greek law 2472/1997 "On the Protection of Personal Data", including my right to access the personal data processed, to request information regarding the data collected about me, to I object to the processing of my personal data and withdraw my consent to the processing of the relevant data. By signing this document, I declare that I am not less than 18 year of age and I acknowledge that I fully understand the above written and accept my rights.

Third Party Grievance template (Greek)



Φόρμα Κατάθεσης Αναφορών Τρίτων Προσώπων

(Να συμπληρώνεται από τον υποβάλλοντα την αναφορά και εάν απαιτείται από τον Υπεύθυνο για θέματα Αναφορών και Σχέσεων με τις Τοπικές Κοινωνίες)

Όλα τα πεδία είναι προαιρετικά. Η φόρμα μπορεί να υποβληθεί επίσης ανώνυμα

Στοιχεία επικοινωνίας

Όνομα	<input type="text"/>
Επώνυμο	<input type="text"/>
Φύλο του ατόμου	<input type="checkbox"/> Άνδρας <input type="checkbox"/> Γυναίκα
Ηλικία του ατόμου	<input type="text"/>
Επιθυμητή γλώσσα	<input type="text"/>
	Ταχυδρομική Διεύθυνση:
	Πόλη/Χωριό/Κοινότητα <input type="text"/>
	T.K. <input type="text"/>
	Διεύθυνση <input type="text"/>
	Τηλέφωνο <input type="text"/>
	E-Mail <input type="text"/>

Αριθμός τηλεφώνου συγγενικού προσώπου/ατόμου επικοινωνίας (σε περίπτωση μη ευρέσεως σας)

Εμπιστευτικότητα υποβάλλοντος την αναφορά:

- Ζητώ να ΜΗΝ γνωστοποιηθεί η ταυτότητά μου χωρίς τη συγκατάθεσή μου *
- Θέλω να υποβάλω την αναφορά μου ανώνυμα **

* Θα πρέπει να γνωρίζετε, ότι εάν η αναφορά απευθύνεται σε άλλο άτομο, το πρόσωπο που θα χειριστεί την αναφορά σας θα πρέπει γενικά να γνωστοποιήσει τις λεπτομέρειες της αναφοράς στο άτομο αυτό, προκειμένου να λάβει την απάντησή του.

** Σε περίπτωση ανώνυμης αναφοράς δεν μπορούμε να επικοινωνήσουμε μαζί σας για την απάντηση, αλλά θα δημοσιεύσουμε την περίπτωση και την απάντηση στην ετήσια έκθεση αναφορών και στην ιστοσελίδα μας.

Πληροφόρηση σχετικά με την κατάσταση του υποβάλλοντος την αναφορά

- Άτομο
- Ομάδα
- Σύλλογος
- Κοινωνική Οργάνωση των Πολιτών
- Δημόσιος φορέας (π.χ. φορέας τοπικής αυτοδιοίκησης)
- Άλλο (καθορίστε)



ΛΕΠΤΟΜΕΡΕΙΕΣ ΑΝΑΦΟΡΑΣ

Ημερομηνία συμβάντος

____/____/20____

Περιγραφή του συμβάντος:

Τι συνέβη; Πότε; Γιατί; Ποιος το προκάλεσε; Ποιο είναι το αποτέλεσμα του προβλήματος;

Large empty box for describing the incident.

Συχνότητα/Πορεία Συμβάντος.

- Μεμονωμένο Περιστατικό/Αναφορά
- Συνεχιζόμενο
- Επαναλαμβανόμενο: Πόσες φορές και πότε και το λόγο;

Small empty box for frequency details.

Επιπρόσθετα υποστηρικτικά στοιχεία

Εάν είναι εφικτό, υποβάλλετε αποδεικτικά στοιχεία ή οποιαδήποτε επιπλέον πληροφόρηση:

Large empty box for additional supporting evidence.

Όνομα/Υπογραφή καταγγέλλοντος

Signature box

Ημερομηνία: ____/____/20____

ΕΠΕΞΕΡΓΑΣΙΑ ΠΡΟΣΩΠΙΚΩΝ ΔΕΔΟΜΕΝΩΝ (GDPR πολιτική συμμόρφωσης)

Εγώ ο υπογεγραμμένος δίνω την απόλυτη και ελεύθερη συγκατάθεσή μου για τη συλλογή, τήρηση σε αρχείο και επεξεργασία των προσωπικών μου δεδομένων (ειδικότερα: προσωπικά στοιχεία όπως ονοματεπώνυμο, ημερομηνία γεννήσεως, φύλο, στοιχεία επικοινωνίας, στοιχεία διεύθυνσης κτλ.) από την εταιρία Ελληνικός Χρυσός των προσωπικών μου δεδομένων ή αυτών που σχετίζονται άμεσα με εμένα και έχουν δηλωθεί (στην εν λόγω φόρμα) με κάποιο από ή όλα τα μέσα σύμφωνα με την κείμενη νομοθεσία «Περί Προστασίας Προσωπικών Δεδομένων». Η επεξεργασία των προσωπικών δεδομένων από την εταιρία Ελληνικός Χρυσός έχει σκοπό την επίλυση της αναφοράς που υποβλήθηκε από εμένα. Συμφωνώ ότι τα εν λόγω προσωπικά δεδομένα μπορούν επιπλέον να διαβιβασθούν και σε άλλες εταιρείες που εργάζονται για το έργο, αλλά μόνον για τους σκοπούς της παρούσας αναφοράς, όπως περιεγράφηκε ανωτέρω, Δεν θα υπάρξει καμία άλλη γνωστοποίηση δεδομένων σε τρίτους. Επιβεβαιώνω ότι έχω ενημερωθεί για τα δικαιώματά μου σύμφωνα με τον ελληνικό νόμο 2472/1997 «Περί Προστασίας Προσωπικών Δεδομένων», περιλαμβανομένου του δικαιώματός μου να αποκτήσω πρόσβαση στα προσωπικά δεδομένα που έτυχαν επεξεργασίας, να ζητήσω πληροφορίες αναφορικά με τα δεδομένα που συνελέγησαν για μένα, να προβάλλω αντιρρήσεις κατά της επεξεργασίας των προσωπικών μου δεδομένων και να ανακαλέσω την συγκατάθεσή μου ως προς την επεξεργασία των σχετικών δεδομένων. Υπογράφοντας το παρόν έγγραφο δηλώνω ότι δεν είμαι νεότερος από 18 ετών και αναγνωρίζω ότι κατανοώ πλήρως όλα τα προαναφερόμενα και αποδέχομαι τα δικαιώματά μου.

5. Annex B 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).