



eldorado gold

Eldorado Gold

Human Rights Policy

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I. Introduction

Eldorado Gold Corporation (“Eldorado”) is committed to incorporating sustainability from the ground up, as articulated in our Sustainability Framework. We are focused on respecting human rights and deliver conflict-free, responsibly sourced gold, while supporting local governments to protect human rights and prevent human rights abuses.

II. Purpose

The purpose of this policy is to articulate Eldorado’s human rights commitments; the Company’s expectations of our employees and contractors; and our commitment to engaging with stakeholders affected by our operations, in support of our Sustainability Framework.

III. Scope

Our Human Rights Policy and management approach has been informed by the following international frameworks:

- The International Bill of Rights
- The International Labour Organization’s Declaration on Fundamental Principles and Rights at Work
- The United Nations Guiding Principles on Business and Human Rights
- The United Nations Declaration on the Rights of Indigenous Peoples
- The Ten Principles of the United Nations Global Compact
- The Voluntary Principles on Security and Human Rights
- The Mining Association of Canada’s *Towards Sustainable Mining* Guiding Principles, Frameworks, Protocols and associated guidance
- World Gold Council Responsible Gold Mining Principles
- World Gold Council Conflict-Free Gold Standard

Our Sustainability Integrated Management System (“SIMS”) establishes company-wide sustainability requirements aligned with these international frameworks to ensure consistent application and adherence across all operations.

All employees and contractors are expected to adhere to this Human Rights Policy and associated requirements in SIMS. Employees and contractors are expected to recognize human rights violations and be aware of the mechanisms in place to report human rights concerns and violations.

Eldorado is committed to:

1. Respecting human rights as defined in the International Bill of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We will seek to conduct business in a manner that does not cause, and is not complicit in, human rights abuses either directly or through our business relationships.
2. Respecting the rights of our workforce, local community members and all stakeholders with whom we interact. We expect our business partners, including security providers, contractors and suppliers, to share this commitment to rights, including those in regard to working conditions, freedom of association, freedom of speech, collective bargaining, maximum working hours, fair wages and benefits, equal opportunity and freedom from discrimination.
3. Regularly reviewing changing conditions in the jurisdictions where we operate, and conducting impact assessments and due diligence to identify human rights risks associated with our activities with the intention of preventing and mitigating adverse impacts.
4. Not discriminating against any individual on the basis of race, gender identity, religion, age, social status, sexual orientation or any other characteristic unrelated to the individual's job performance.
5. Not tolerating disrespectful or inappropriate behaviour, harassment, intimidation or unfair treatment, or retaliation of any kind by our employees or those of our suppliers and business partners.
6. Respecting the human rights of individuals who require particular attention, including women, children, Indigenous Peoples and other potentially vulnerable or marginalized groups.
7. Respecting the collective and customary rights, interests, culture and connection to the land of directly affected Indigenous Peoples, if present in the area of influence. We will work to obtain their free, prior and informed consent before proceeding with development and throughout the life of the project.
8. Prohibiting child labour, forced labour and modern slavery in our operations and in our supply chains, and supporting the elimination of all forms of child and forced labour.
9. Managing security-related human rights risks through implementation of the Voluntary Principles on Security and Human Rights.
10. Not causing, supporting, benefiting from or contributing to unlawful armed conflict, human rights abuses or breaches of international humanitarian law.
11. Establishing fair, accessible, effective and timely grievance mechanisms through which human rights concerns can be raised by our stakeholders and resolved without risk of discrimination or retaliation.

IV. Reporting

Violations of this Policy can be anonymously reported with our whistleblower reporting agency, EthicsPoint at www.eldorado.ethicspoint.com. All reports will be treated confidentially to the extent permitted by law, and we will not allow any retaliation against those who have acted in good faith in reporting a violation.

Eldorado is committed to communicating this policy to internal and external stakeholders, and publicly reports human rights management and performance information on an annual basis through the following mechanisms:

- Corporate sustainability report prepared in accordance with the voluntary Global Reporting Initiative (GRI) standards (Core option) and Sustainability Accounting Standards Board (SASB) Metals and Mining Standard;
- Responsible Gold Mining Principles report, including company conformance and third-party assurance; and
- United Nations Global Compact Communication on Progress.

Reporting mechanisms are selected to ensure disclosures are transparent, well-organized, and support our Sustainability Framework. Review of new or evolving reporting mechanisms is undertaken annually, at a minimum, to ensure our approach remains fit for purpose.

V. Governance and Accountability

The Sustainability Committee of the Board provides oversight of Company policies and strategies in the areas of environment, tailings management, climate change health and safety, social performance, human rights and security. Ultimate accountability for social, environmental, and health and safety performance rests with our President & Chief Executive Officer (CEO), while the Executive Vice President and Chief Strategy Officer and Executive Vice President and Chief Operating Officer have oversight at the corporate level. Responsibility for ensuring adherence to the requirements of this Policy is assigned to the General Manager of each project and operation.

VI. Monitoring and Non-Compliance

Eldorado monitors compliance with this Policy by conducting quarterly risk assessments and regular site-based assessments in accordance with our Sustainability Integrated Management System.

VII. Contacts

The Director, Sustainability is responsible for establishing and maintaining this Policy. The Policy is approved by the President & CEO.

VIII. Document Control

Version	Author	Approval	Approval Date
1.0	Jennifer Prospero	George Burns	February 24, 2022