



eldorado gold

Eldorado Gold

Supplier Code of Conduct

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I. Purpose and Scope

Eldorado Gold Corporation (“Eldorado” or “Company”) is committed to incorporating sustainability from the ground up, as articulated in its Sustainability Framework. This Supplier Code of Conduct (the “**Supplier Code**”) is intended to govern the conduct of Suppliers when doing business with or on behalf of Eldorado and its subsidiaries.

The Company expects Suppliers to follow and adhere to all applicable regulations and laws where they and Eldorado operate, as well as the minimum standards provided in the Supplier Code.

II. Legal Compliance

Compliance with Laws and Regulations

The Company expects Suppliers to act ethically and to comply with laws and regulations of the jurisdictions in which they and Eldorado operate. Illegal or unethical conduct by Suppliers may affect the Company’s financial performance and profitability, significantly impact the Company’s reputation and may expose Eldorado and its directors, officers and employees to criminal and civil liability.

Suppliers are also expected to conduct business according to the Supplier Code, regardless of local customs or practices. In the event of a conflict between the provisions of the Supplier Code and contractual provisions, the stricter standard applies.

Insider Trading

Securities laws and stock exchange regulations are extremely strict regarding insider trading and the use and disclosure of material non-public information. Suppliers are prohibited from purchasing or selling Company securities when they are in possession of material non-public information concerning the business, operations or capital of the Company. They are similarly prohibited from informing others of such information.

Suppliers and representatives must comply with the Company’s [Insider Trading Policy](#), which is incorporated by reference herein and is available on Eldorado’s website.

Bribery and Corruption

Suppliers must support open, fair and competitive business environments, including in advertising, sales and competition. Suppliers must not engage in price fixing, market allocation, business espionage, or other unfair, anti-competitive trade practices.

Under no circumstances is it acceptable to offer, give, solicit or receive any form of bribe, kickback, or inducement. In the same manner, Suppliers must avoid either the fact or the appearance of improperly influencing relationships with organizations or individuals with whom the Company deals in the course of its business.

Suppliers must also comply with all applicable laws prohibiting improper payments to public officials. Suppliers shall conduct their dealings with government officials and employees in compliance with the *Corruption of Foreign Public Officials Act* (Canada), the *Foreign Corrupt*

Practices Act (United States) and local laws and regulations, and in such a way that the integrity and reputation of the Company, the governments and the government officials or employees will not be brought into question or not be a source of embarrassment should the details of such relationship become public knowledge.

Suppliers should establish and maintain their own policies to prohibit giving and receiving bribes and implement processes to ensure compliance with anti-bribery laws and regulations.

Money Laundering and Terrorist Financing

Suppliers shall support the elimination of money laundering where there is an identifiable and reasonable risk of money laundering resulting from, or directly or indirectly related to, the extraction, trade, handling, transport or export of gold.

Suppliers must not knowingly accept funds that are derived from unlawful sources or activities. Suppliers shall be committed to complying fully with all applicable anti-money laundering laws. Moreover, Suppliers must not conduct business with parties who may be involved in or who support terrorist activities.

Conflicts of Interest

Any real or perceived conflict of interest between the Supplier and the Company must immediately be disclosed to the Company so that appropriate action can be taken to mitigate risks.

Gifts, Entertainment and Other Advantages

Suppliers are prohibited from providing or offering gifts to Eldorado employees that could inappropriately influence Eldorado's business decisions or gain an unfair advantage. Gifts, meals, entertainment, hospitality, and trips that are lavish or lack transparency or a legitimate purpose may be viewed as bribes, may create the appearance of a conflict of interest, or may be perceived as an attempt to improperly influence decision making.

Giving business courtesies to Eldorado employees, if at all, should be modest and infrequent. Suppliers must not give anything to gain an improper business advantage. Suppliers may not, under any circumstance, offer cash or any other form of money as a gift.

Privacy and Data Security

Eldorado believes in taking steps to protect the privacy and confidentiality of parties with which it maintains a business relationship. The Company limits the collection, use and disclosure of personal or confidential information only to that which is necessary for business, legal, safety, security, administrative or contractual purposes and collection of such personal information is to be conducted by fair and lawful means and, except where otherwise permitted or required by law, with the consent of the individual from whom the information is being collected.

Eldorado requires Suppliers to ensure the accuracy of the information they provide, safeguard confidential and personal information, and keep records in compliance with local laws. Suppliers must, at all times, adhere to the Company's policies, standards and procedures regarding the collection, use, and disclosure of personal information. Suppliers must also employ sufficient security safeguards to ensure the data security of such protect personal information against loss or theft as well as unauthorized access, disclosure, copying, use or modification. In any event, Suppliers must comply with all applicable laws regulating the disclosure of personal information, including but not limited to the *Personal Information Protection and Electronics Documents Act* of

Canada, provincial privacy laws, the European General Data Protection Regulations (GDPR) and any other applicable privacy and data security laws.

III. Human Rights and Fair Labor Practices

Eldorado is focused on respecting human rights and delivering responsibly sourced gold, as further detailed in its [Human Rights Policy](#) and related Sustainability Integrated Management System. Suppliers, too, are expected to adopt robust human rights and fair labor practices. In addition to complying with all human rights and labor laws and regulations that apply to them, Suppliers are expected to adhere to the commitments set out in Part III of Eldorado's Human Rights Policy.

IV. Environment, Health & Safety and Communities

Environment

The Company is committed to conducting its business in a manner that protects the environment, preserves resources and ensures sustainable development, as further detailed in its [Environmental Policy](#). Suppliers are expected to comply with applicable local laws and regulations, maintaining all required permits and documentation (and keep these available for inspection) and otherwise adhere to the following principles:

1. Safely and responsibly manage hazardous materials to protect human health and the environment during transportation, storage, use and disposal.
2. Identify and assess the environmental risks and impacts of their operations and implement measures to minimize their environmental impact.
3. Provide proper environmental training, equipment and systems to their workforce.

Health and Safety

The Company works to provide a safe and healthy workplace and is committed to providing leadership and resources to manage health and safety risks, as further detailed in its [Health and Safety Policy](#). Suppliers are expected to promote and work to demonstrate “safety first” and “zero harm” as core concepts of their safety culture across all levels of their organization and comply with all site-specific health and safety standards implemented by the Company. Suppliers are further expected to otherwise adhere to the commitments set out in Part III of Eldorado's Health and Safety Policy.

Social Performance

Eldorado is committed to working with its communities, in a spirit of mutual respect to grow local economies and deliver lasting opportunities, as further detailed in its [Social Performance Policy](#). In conducting their activities, Suppliers are expected to adhere to the commitments set out in Part III of Eldorado's Social Performance Policy. Suppliers are expected to comply with the terms of any agreement between the Company and Indigenous Peoples relevant to the scope of the work performed.

Respectful Workplace

Eldorado is committed to providing a physically and psychologically safe work environment where all people are treated with respect, decency, and dignity, and where harassment, discrimination, and workplace violence in all forms are prohibited, as further detailed in its [Respectful Workplace Policy](#). In conducting their activities, Suppliers are expected to adhere to the principles set out in Eldorado's Respectful Workplace Policy.

V. Company Assets

Use of Company Assets

Suppliers are entrusted with the care and use of Company assets with the expectation that they will be used for the benefit of, and as directed by, the Company. Suppliers must protect and responsibly use the tangible and intangible assets of Eldorado, including supplies, consumables, equipment and intellectual property, when authorized by the Company to use such assets.

Suppliers may not obtain, use, or divert Company assets for their gain or benefit, or for the gain or benefit of anyone else, or to harm anyone. The Company will not tolerate theft under any circumstances and will seek to enforce all available remedies in the event of such theft, including both civil and criminal remedies, where available.

Confidential Information

As part of their business relationship with Eldorado, Suppliers may be entrusted with confidential information about Eldorado and its business partners. Confidential information is Eldorado's property, or the property of its business partners. It includes information that is not legally available to the public, such as technical or scientific information or reports, business or marketing plans or projections, earnings and other internal financial data, personnel information and other non-public information.

Eldorado expects Suppliers to use confidential information only for legitimate business purposes and not for personal gain. Suppliers may not share confidential information with third parties (including a Supplier's own contractors) unless authorized to do so by Eldorado and must take all reasonable steps to safeguard confidential information and prevent the loss of confidentiality.

Reporting Concerns or Potential Violations

If a Supplier becomes aware of a potential violation to the Supplier Code or to a related Eldorado policy, they must bring the matter to the attention of the person in the Company they are doing business with. Concerns and potential violations can also be anonymously reported online or by phone with Eldorado's whistleblower reporting agency, EthicsPoint, at www.eldorado.ethicspoint.com.

Suppliers are expected to have an internal process whereby complaints can be raised and investigations can be undertaken for violations of this Supplier Code. When complaints are raised, Suppliers must promptly investigate. Suppliers will promptly notify Eldorado of any investigation and report the outcome of such investigation to Eldorado.

Eldorado personnel charged with overseeing and responding to complaints and reports will investigate any reported violations and will determine an appropriate response, including corrective action and preventative measures when required.

Eldorado will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of the Supplier Code. Conversely, reporting a Supplier Code violation knowing it to be false or inaccurate may also result in corrective action up to and including termination of the business relationship with Eldorado.

If Suppliers are in doubt about the best course of action in a particular situation, they should seek guidance from Eldorado’s Legal and Compliance Group at compliance@eldoradogold.com.

VI. Monitoring and Non-Compliance

Depending on their contractual relationship with Eldorado, Suppliers are required to either complete certification forms or sign a contract with the Company, which incorporates the Supplier Code. Eldorado will determine the frequency of certification, as applicable. By adhering to the Supplier Code, a Supplier agrees to meet the expectations and the standards outlined herein. If the breach cannot be corrected or if the Supplier is unwilling to correct the gaps found or is misaligned with Eldorado’s values, then Eldorado may take corrective action, up to and including termination of the business relationship with Eldorado.

VII. Guidance and Training

Suppliers are expected to seek guidance in any case where there is a question or concern about compliance with either the letter or the spirit of the Supplier Code or any applicable laws.

Suppliers must ensure their employees and subcontractors working on Eldorado matters or projects understand and comply with the contents of the Supplier Code, the applicable laws and regulations and generally recognized standards.

Training and guidance may be provided by Eldorado to Suppliers to ensure that the intent and actions expected as written in the Supplier Code are understood.

VIII. Contacts

Eldorado’s Legal and Compliance Group is responsible for establishing and maintaining this Supplier Code. They can be contacted at compliance@eldoradogold.com.

IX. Document Control

Version	Author	Approval	Approval Date
1.0	Frank Herbert	George Burns	April 5, 2023

**ACKNOWLEDGEMENT AND AGREEMENT TO COMPLY WITH ELDORADO'S SUPPLIER
CODE OF CONDUCT**

Supplier: _____

Name of Authorized Signatory: _____

The Supplier hereby acknowledges having received, read and understood a copy of Eldorado Gold Corporation's Supplier Code of Conduct, and hereby undertakes to comply with its provisions, promote the goals, measures, objectives and principles set forth therein and take all the necessary steps to ensure its application.

The Supplier agrees that it has the responsibility to report any concerns about a potential violation of the Supplier Code Conduct.

The Supplier agrees to demonstrate compliance with this Supplier Code of Conduct upon Eldorado Gold Corporation's request. Eldorado reserves the right to verify compliance with this Supplier Code including through site visits and inspections by Eldorado personnel or designated agents. The Supplier agree to provide copies of documents that Eldorado may need to verify compliance with this Supplier Code of Conduct, upon request. The Supplier agrees to report to Eldorado any investigations of potential breaches of this Supplier Code of Conduct and the results of such investigations.

Signature _____

Date _____