



Stakeholder Engagement Plan of the Kassandra Mines

July 2022



Olympias



Stratoni



Skouries

DOCUMENT CONTROL SHEET



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ACRONYMS AND ABBREVIATIONS

Acronym	Definition
AUTH	Aristotle University of Thessaloniki
BCE	Before Common Era
CDP	Community Development Management Plan
CIC	Community of Interest Committee
CLO	Community Liaison Officer
COI	community of interest
COVID-19	coronavirus disease 2019
CSO	Civil Society Organisation
CSR	Corporate Social Responsibility
DIPA, in Greek	Environmental Permitting Division
E&S	Environmental and Social
EBRD	European Bank for Reconstruction and Development
EC	European Commission
EG	Eldorado Gold
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
EPC	Engineering, Procurement, and Construction
ERM	Environmental Resources Management
ESG	Environmental and Social Governance
ESIA	Environmental and Social Impact Assessment
EU	European Union
EUR	euro
EWMF	Extractive Waste Management Facility
FAQ	Frequently Asked Questions
FEA	Finite Element Analysis
GBVH	Gender-based Violence and Harassment
GC	Grievance Coordinator
GDPR	General Data Protection Regulation
GM	Grievance Mechanism
GMF	Grievance Management Framework
GMR	Grievance Master Register
GTF	Grievance Task Force
ha	hectare
HR	Human Resources
HSSE	Health, Safety, Security & Environment
IFC	International Finance Corporation
IPAM	Independent Project Accountability Mechanism
km	kilometre
ktpa	Kilotonnes per annum
LOM	life-of-mine
m	metre
ML	Madem Lakkos
MoE	Ministry of Environment
NGO	non-governmental organization

Acronym	Definition
NTS	Non-technical Summary
PEA	Preliminary Economic Assessment
PFS	Prefeasibility Study
PR	Performance Requirement
Project	Kassandra Mines Project
PS	Performance Standards
RGMP	Responsible Gold Mining Principles
S.A.	Société anonyme (public limited company)
SEE, in Greek	Environmental inspection body
SEP	Stakeholder Engagement Plan
SIMS	Sustainability Integrated Management System
SMP	Sustainable Mining program
Social AoI	Social Area of Influence
TSM	Towards Sustainable Mining
USD	United States dollars
WWF	World Wildlife Fund

CHAPTER 1 INTRODUCTION

1.1 Background

This document serves as a Stakeholder Engagement Plan (SEP) for the Cassandra Mines Project (the Project). The SEP establishes the framework by which stakeholders at all levels – and primarily local stakeholders – are informed about the Project and provided with the opportunity to provide comments and input to Project development and ongoing over its entire cycle. It has been designed to meet relevant legal and regulatory requirements, as well as standards of international financiers such as the Performance Requirements of the European Bank for Reconstruction and Development (EBRD).

The SEP provides guidelines to manage effective and meaningful engagement with stakeholders. It is focused on guiding interaction and communication with international, national, regional, and local stakeholders concerned about the development of the Project and related studies, interested in the Project and potentially affected by the Project, while setting the stage for future engagement during the subsequent development, operation, and closure phases. The SEP also includes a presentation of the Grievance Management Framework (GMF) established by Hellas Gold.

Stakeholder engagement is an ongoing process; as such, this SEP is a living document and will be reviewed and adjusted annually (at a minimum) as the Project progresses.

1.2 Objectives of the SEP

The purpose of the SEP is to create a framework for a consistent, comprehensive, inclusive, accessible and appropriate approach to stakeholder engagement for the Project, in line with the requirements of the Greek regulations and EBRD Performance Requirement (PR) 10.

The key objectives of the SEP are as follows:

- Pro-actively identify and analyse stakeholders that (1) are affected, or are likely to be affected, (directly or indirectly) by the Project, or (2) may have an interest in Cassandra Mines, and include them in the engagement process.
- 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.

Through the stakeholder engagement process established by this SEP, Hellas Gold plans to maintain good relationships, trust and credibility with the local communities and stakeholders generally, and thereby to enhance its social license to operate. Therefore, this engagement process encompasses a range of activities and approaches and spans through the entire Project lifetime. The SEP will be updated regularly to show engagement commitments including going forward the closure and rehabilitation phases.

1.3 Scope

This SEP is organized as follows:

- Chapter 2 provides a brief presentation of the Project, as well as the environmental, social, and historical stakeholder engagement contexts.
- Chapter 3 describes the corporate policies, applicable Greek environmental and social (E&S) legislation and international standards that frame consultation and disclosure for the Project.
- Chapter 4 identifies and analyses Project stakeholders and vulnerable groups.
- Chapter 5 synthesizes recent engagement activities conducted by Hellas Gold as well as past concerns raised through previous engagement associated with the Cassandra Mines.
- Chapter 6 presents the proposed engagement program for the Environmental Impact Assessment (EIA) and the Environmental and Social Impact Assessment (ESIA) as well as an engagement framework for the following phases.
- Chapter 7 highlights the Project Grievance Mechanism.
- Chapter 8 provides an overview of the necessary tracking, monitoring, reporting requirements, and evaluation measures to oversee and document SEP implementation.
- Chapter 9 summarizes the roles and responsibilities associated with stakeholder engagement and grievance management within Hellas Gold.

CHAPTER 2 PROJECT DESCRIPTION

2.1 Project Setting

Kassandra Mines (Stratoni–Mavres Petres, Skouries, and Olympias) and associated facilities are located on the east coast of the Halkidiki Peninsula, approximately 110 km east of Thessaloniki. The geomorphology of the region is slightly mountainous with two main mountains: Stratonikou and Holomontas. Seven communities are located in the valley between those two mountains and in the Project area, namely Megali Panagia, Paleochori, Neochori, Stageira, Stratoniki, Stratoni, and Olympiada.

The Project region has a long history of mining and is known for its rich geology and extensive gold, copper, silver, lead, and zinc deposits. Ancient mining reached a peak between 350 and 300 BCE. It is believed that by 300 BCE, the bulk of the ores above the water table at Olympias had been exploited, though the Stratoni mine continued production through the Roman, Byzantine, and Ottoman periods. The actual presence of ancient mines in the area makes it culturally important.

Following historical mining activities, exploration in the Olympias area recommenced in the 1950s. In the early 1970s, ownership of the mine was transferred to the Hellenic Fertilizer Company, which started full production. In 1995, the mine was acquired by TVX Gold, which filed for bankruptcy in 2003 following the fall of international gold prices and local opposition.

In 2004, Hellas Gold – through European Goldfields – acquired the mine through a Transfer Agreement from the Greek state, which included an obligation to re-employ the workforce (Eldorado Gold 2021). In 2011, the Ministry of Environment (MoE) formally approved the EIS submitted by Hellas Gold (ENVECO 2010) for mine expansion at the three Kassandra Mine sites: Olympias, Skouries, and Stratoni. In 2012, Eldorado Gold gained control of the Mines of Halkidiki through the acquisition of European Goldfields. Construction of the Skouries Mine was stopped between 2015 and 2017 due to issues related to the permitting process. In December 2018, the Project was placed on care and maintenance.

In February 2021, a new Investment Agreement was signed between Eldorado Gold and the Hellenic Republic, amending the 2004 Transfer Agreement (Eldorado Gold 2021). The Investment Agreement was ratified by Law 4785/2021 OGG 42A/23.3.2021 and provides a modernised legal and financial framework to allow for the advancement of Eldorado's investment in the Kassandra Mines (Hellenic Parliament 2021).

As part of the new business plan Kassandra Mines is undergoing a new EIA as part of the Greek permitting process, updating the existing environmental permitting of Kassandra mines construction and operation works. Concurrently, Hellas Gold, which is seeking Project financing from the EBRD, commissioned an ESIA to meet the requirements of EBRD's Environmental and Social Policy.

The ESIA builds on the regulatory framework set out in the EIA and provides a structure for the assessment and management of environmental and social risks and impacts that goes beyond compliance with Greek requirements, while respecting the requirements and commitments set out in the EIA.

2.2 Project Overview

The Eldorado Gold Cassandra Mines complex consists of four subprojects:

- **Olympias Mining Facilities:** A gold–silver–lead–zinc underground producing mine located 2 km west of Olympiada and 8 km north of the Stratoni port facilities.
- **Stratoni - Mavres Petres Mining Facilities:** An underground, silver–lead–zinc mine located 1 to 2 km west of Stratoni Plant, with the mine extending under the village of Stratoniki.
 - In October 2021, Hellas Gold made a decision to place Mavres Petres on Care & Maintenance as the proven resources and reserves are nearing end of life. Exploration drilling will be accelerated to expand proven resources & reserves in order for this asset to resume operations upon favourable completion of the feasibility study phase.
- **Stratoni Loading Facilities:** Located on the coast at the north end of the 600 m beach in the coastal village of Stratoni, including offices, a ship loading facility, a plant and reclaimed land at the beach.
- **Skouries Mining Facilities:** A high-grade gold–copper porphyry deposit located in a mountainous forest area, 10 km southwest of Stratoni Plant. The mine is currently 50 percent constructed and placed under care and maintenance awaiting approval of certain permits. The mine will initially operate as an open-pit and underground mine, later followed by a solely underground mine.

The integrated Cassandra Mines Project was developed as a single master plan in the 2000s, and forms the design basis of the 2010 Environmental Impact Statement (EIS), approved by the Greek permitting authorities in 2011. The design basis was to reduce plant and waste areas at the four sites and concentrate them in the former mining areas between Mavres Petres and Stratoni. The principal aim was to achieve operational efficiencies, while minimising and, to some extent, reversing impacts from historical mining to the environment, cultural heritage, and society.

Currently, the Project has advanced towards the integrated single master plan design, but due to permitting delays and objections from the community (including some reported political opposition within both local and national government), parts of the plan have not commenced, or have been halted mid-construction.

The main infrastructure, current and planned, within each subproject of the Project is outlined in Table 2.2-1.

The port of Thessaloniki will be used for receiving freight for construction and during operation for shipment of operating consumables to the Project. The port at Stratoni will be upgraded as part of the Olympias subproject and will serve the Project once commissioned, receiving concentrate from the Olympias flotation plant, the Skouries flotation plant, and the Stratoni flotation plant.

The mining materials (mining waste, old tailings, flotation waste, and concentrates) that will be produced at the Olympias Mining Facilities will be transported by road to the Kokkinolakkas Extractive Waste Management Facility (EWMF) at Madem Lakkos and Stratoni area for export via the Stratoni port. The concentrate produced at the Skouries Mining Facilities will be transported by road to Stratoni for export via the Stratoni Loading Facilities (port). Concentrate may also be transported to Thessaloniki for export in container vessels from the port of Thessaloniki. During the life-of-mine (LOM), transport will use the Olympias–Stratoni or Skouries–Stratoni rural roads, with no need to build an additional road network. Exports from Stratoni and Olympias Mining Facilities to Thessaloniki will be via Stavros. Exports from the Skouries Mining Facilities via Thessaloniki will be via rural roads and will not require construction of new roads.

Table 2.2-1: Current and Planned Infrastructures of the Cassandra Mines Project

Project Area	Current Infrastructure	Planned Development
Olympias Mining Facilities	<ul style="list-style-type: none"> • Operating gold–silver–lead–zinc underground mine. • Newly refurbished flotation plant for crushing and grinding (now in care and maintenance), including filter presses and water treatment facilities to produce dry concentrate (lead–silver, zinc, and gold-bearing pyrite–arsenopyrite) that are sold and shipped to overseas refineries. • Ancillary facilities including production services building, surface workshop and warehouse, process plant, paste plant, and surface fuel storage. • Abandoned (legacy) mining areas total approximately 80 ha across the Olympiada Valley. These existed prior to Hellas Gold taking tenure in 2004. Degraded legacy areas are subject to ongoing progressive rehabilitation activities, including clean-up of mineral wastes and bi-products, land restoration, and revegetation using native species. A 10 ha plant nursery has been constructed in part of the degraded legacy area, and it is providing stock for revegetation activities. • Small complex of offices. 	<ul style="list-style-type: none"> • Extend drilling in untested areas. • Restart increase in capacity and upgrade of existing flotation plant facilities from 350 to 650 ktpa on average annual production. • Old tailings to be fully removed, cleaned at the nearby flotation plant, and conduct environmental rehabilitation. • Upgrade existing water treatment plant. • Install new mine water management system through new pumping stations. • Dismantle and rehabilitate the complex of offices. • Transport mine waste to the new Kokkinolakkas EWMF at Madem Lakkos; transport concentrate to Stratoni Port facilities.
Stratoni-Mavres Petres Mining Facilities	<ul style="list-style-type: none"> • Operating Mavres Petres silver–lead–zinc underground mine. • Closure of depleted underground Madem Lakkos mine that is currently being rehabilitated using the backfill method to improve drainage. • Kokkinolakkas EWMF recently completed phase 1 to the +185 m level and receiving dry-stack compressed tailings and legacy wastes. • Closure and rehabilitation of Old Chevalier tailings area as well as other old tailings and stockpiles that are being integrated into new disposal facility. • Existing flotation plant, using multi-stage flotation process to produce lead–silver and zinc concentrates, which are then shipped from the Stratoni and Thessaloniki ports to overseas refineries. • Small complex of offices. 	<ul style="list-style-type: none"> • Continued drilling to identify additional resources – PEA/PFS/FEA stage. • During the C&M period, mining activities including extraction, product collection and processing at this Mine and its Flotation Plant will be put on hold. Support facilities including, but not limited to, the backfill unit, the shot concrete production, the explosives store, will be put into C&M as well. • New Kokkinolakkas EWMF, to become the main repository for mineral waste from Olympiada and Stratoni subprojects with subsequent raising of the embankment constructed as required for storage to the +200 m, +205 m, and the final +218 m/+215 m level. • New additional storage facility for concentrates in the Mavres Petres mining facilities area. • Proposed public road upgrades including Stavros–Ierissos provincial road interchange, Mavres Petres worksite road and Stratoni–Madem Lakkos road.

Project Area	Current Infrastructure	Planned Development
		Notes: <ul style="list-style-type: none"> • New ML flotation plant, new ML metallurgy plant, and a sulfuric acid production unit are not included in the current EIA. • ML–Olympias connecting tunnel is not included in the New Investment Plan, adopted by the Greek Parliament.
Stratoni Loading Facilities	<ul style="list-style-type: none"> • Port facility 26 km by paved road from the Olympias concentrator. • Large complex of service offices. • Ship loading facility, including a conveyor and walkway extending from concentrate storehouses. • Plant, which has a 400 ktpa capacity crushing, grinding, and two-line flotation plant with filter presses and water treatment facilities, as well as port-side concentrate storehouses and conveyor. • Reclaimed land at the beach, composed of Stratoni Plant tailings up to 15 m thick, deposited between 1920s and 1980s. 	General upgrade of port facilities to accommodate the expansion of Olympias Mine to 650 ktpa, including: <ul style="list-style-type: none"> • Upgrade existing roofed warehouse, including dismantling of existing store and reconstruction of a new, modern storage area that will include industrial best applications for dust and vehicle emissions control and measures to prevent noise, visual, and other nuisance. • Upgrade water management infrastructure. • Upgrade the ship loading infrastructure to handle additional concentrate, products, and increased quantities. Such upgrade will increase the speed of the conveyor belt system and will include rehabilitation work of the underwater loading facilities.
Skouries Mining Facilities	<ul style="list-style-type: none"> • Proposed open-pit mine for high-grade gold–copper porphyry deposit. Vegetation cleared in 2017. The mine is 50% constructed and placed under care and maintenance awaiting approval of permits. • Karatzas Lakkos Integrated EWMF at a very preliminary stage of construction (dam not constructed). • Partially constructed Flotation Plant with a large capacity for crushing, grinding, and single line flotation. • Upgraded access road to connect the process plant and mining area with national road network (7 km). 	<ul style="list-style-type: none"> • Simultaneous operation of open-pit and underground mine, followed by solely underground mining. • Complete the Flotation Plant. • Complete Karatzas Lakkos EWMF, including dam, water management ponds, closure capping stockpile and tailings filtration plant. • Construct mine infrastructure including ancillary facilities such as offices, mine dry(s), warehousing, and maintenance shops. • Improve the Skouries–Stratoni forest road for heavy duty vehicles to transport copper–gold concentrates from Skouries flotation plant to Stratoni loading facilities.

EWMF = Extractive Waste Management Facility; FEA = Finite Element Analysis; km = kilometre; ktpa = kilotonnes per annum; m = metre; ha = hectare; ML = Madem Lakkos; PEA = Preliminary Economic Assessment; PFS = Prefeasibility Study

2.3 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 by car and bus.

2.3.1 Social Area of Influence

The Social Area of Influence (Aoi) is used to describe the boundaries to which Project impacts may be felt. In establishing the Project's Social Aoi, the ESIA study considered two factors: first, the proximity to the Project, and second, the interaction between communities and the Project. The Social Aoi 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 on Figure 2.3-1. 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 Aristotélis 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 for Project-related transport. Based on the preliminary assessment of direct and indirect impacts, a list of potentially affected local communities was developed. Table 2.3-1 describes local municipalities and communities within the Aol. Municipal or local communities and settlements highlighted in grey shading in Table 2.3-1 are considered to be directly impacted by the Project.



Figure 2.3-1: Social Aol and Communities of the Social Aol

Table 2.3-1: Municipal and Local Communities within the Social Aol

Regional Unit and Municipality	Municipal Unit	Municipal/Local Community	Villages and Population (as of the 2011 Census)	Distance to Nearest Subproject Facilities ^a
Halkidiki, Municipality of Aristotelis	Arnaia	Municipal Community of Arnaia	Arnaia (2,300)	Skouries Mining Facilities (8 km)
		Local Community of Varvara	Varvara (538)	Olympias Mining Facilities (7.7 km) ^b
			Chrisi Akti (82)	
			Kalyvia of Varvara (11)	
			Kaukanas (0)	
	Local Community of Neochori	Neochori (714)	Skouries Mining Facilities (2.3 km)	
	Local Community of Paleochori	Paleochori (1,489)	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 (3,266)	Stratoni Loading Facility (13.7 km)
			Gavradia (73)	
			Xiropotamo (66)	
			Koumitsa (40)	
			Nireas (6)	
			Limani (4)	
		Local Community of Olympiada	Olympiada (741)	Olympias Mining Facilities (1 km)
Local Community of Stageira		Stageira (352)	Stratoni Mining Facilities (1.5 km)	
Local Community of Stratoniki		Stratoniki (561)	Stratoni Mining Facilities (600 m)	
	Kryoneri (2)			
	Eleftheronisos (0)			
Local Community of Stratoni	Stratoni (1,057)	Stratoni Loading Facilities (20 m)		
Thessaloniki, Municipality of Volvi	Municipal Unit of Rentina	Municipal Community of Stavros	Stavros (3,672)	Olympias Mining Facilities (7.2 km)

km = kilometre; m = metre

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

^b 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.

Local communities, including towns and villages within the Social Aol, are presented on Figure 2.3-2.



Figure 2.3-2: Settlements within the Social AoI Socioeconomic Characteristics of the Social AoI

The Region of Central Macedonia, within which the two Regional Units of Halkidiki and Thessaloniki lie, has one of the country's most diversified economies, comprising tourism, mining, agriculture, manufacturing, and energy. At present, mining is still predominant in the Regional Unit of Halkidiki; operations at the Olympias, Stratoni-Mavres Petres, and Skouries mine sites within the AoI represent a key source of employment in the area.

The Project footprint is in the Municipality of Aristotelis. The administrative head of the Municipality is Ierissos. The Municipality of Aristotelis had a total population of 18,294 people according to the 2011 Census.¹

The administrative head of the Municipality of Vólvi is the town of Stavros. The Municipality of Vólvi had a total population of 23,478 people according to the 2011 Census.

Both in the Municipality of Aristotelis and in the Municipality of Vólvi, half the towns and villages are in lowlands, and the rest on hilly terrain. This determines an uneven economic development of the municipalities as the coastal areas around the Strymonikos Gulf, where the large tourist resorts are located, are more developed. In the other areas, mining and agricultural production remain

¹ 2011 is the most recent census available at the time this SEP was drafted.

dominant. Other important livelihoods activities in the hilly terrain area include forestry and bee-keeping, and fishing in the coastal area.

The Municipality of Aristotelis is characterized by greater employment/income from mining activities. As of November 2021, Hellas Gold had 1,170 employees from the Municipality of Aristotelis.

Within the Municipal Unit of Arnaia, mining employment has traditionally dominated in the communities of Neochori and Paleochori. In Varvara, some people work in the mines, whereas in Arnaia, few people work for Hellas Gold.

In the Municipal Unit of Panagia, the local population of Megali Panagia primarily works in the mines and in tourism.

In the Municipal Unit of Stageira–Akanthos, the communities of Stratonis, Olympiada, Stageira, and Stratoniki are dependent on mining, where 80 to 90 percent of their population work for Hellas Gold. The mines have been crucial for the local community, and working in other businesses is considered a side job.

According to some stakeholders in the Aol, women in the local communities are in an unequal position when it comes to fundamental rights (especially older women). Women's primary role is regarded as the care of the children and the household. Childcare options are limited, which often restricts women's opportunities outside of the home, as does access to financial support.

Land use in the Municipality of Aristotelis (and especially in the Project area) mainly consist of forest and semi-natural areas (approximately 70 percent), while agricultural land occupies less than 30 percent of the total area. This is lower when compared to the rest of the Regional Unit of Halkidiki, where agricultural lands occupy a broader area. In the Municipality of Volvi, the main land uses are broadleaf forest (19 percent), non-irrigable arable land (19 percent), Sclerophyllous vegetation (16 percent), and permanently irrigated land (11 percent).

A total of 31 designated cultural heritage sites have been identified in the Aol for the Project. Another 24 non-designated cultural heritage sites and 66 incidences of non-designated Intangible cultural heritage (including local customs, local festivals, arts and nature incidences of Intangible traditions) value have been identified in the Social Aol based on official published sources, previous archaeological work undertaken, and engagement with the Ephorate of Antiquities of the Regional Unit of Halkidiki. Detailed information on the cultural heritage within the Social Aol is provided in ESIA Section 10.4.12, Cultural Heritage.

2.3.2 Social Context Considerations for Stakeholder Engagement

Key socioeconomic characteristics that have influenced planning and implementation of ESIA-related stakeholder engagement are:

- Only Greek is spoken locally, so Greek-speaking consultants were present at all meetings and were leading the consultations;

- Meetings were organized with community presidents first, as these are the main representatives of the small communities within the Social Aol;
- Meetings were organized with labour unions as mining employment is a key occupation for several local communities;
- Women are under-represented in community councils and institutional leadership in the Social Aol. Efforts were made to engage with as many women as possible within the limited timeframe, notably with representatives of women organizations.
- Most local self-organized groups are formed around existing livelihood activities, including tourism, bee keeping, fishing, agriculture and forestry. Existing associations were engaged during consultations.

2.3.3 Benefits from Mining Activities

2.3.3.1 Overview

According to the Eldorado Gold Olympias Technical Report (Eldorado Gold 2019), the Cassandra Project provides considerable economic and social benefits to the Regional Unit of Halkidiki, including:

- Significant contribution to the national economy: According to the 2018 Sustainability report of Hellas Gold,² by 2018 the Company had invested more than \$1 billion USD (€0.89 billion EUR) in the Greek economy. In 2018, Hellas Gold payments to government were \$16 million USD (€14.21 million EUR) and community contributions were \$1.5 million USD (€1.33 million EUR).³
- Substantial infrastructure constructed and equipped by local companies;
- Expansion of service industries in the local economy;
- Progressive creation of new jobs (see Section 2.3.3.2, Company Employment and Local Supply); and
- Corporate Social Responsibility (CSR) activities (see Section 2.3.3.3, Corporate Social Responsibility Activities).
- During engagement activities conducted in September and October 2021, leaders and organizations from communities closer to the Project facilities highlighted the important role played by mining operations in job creation in the area. It was also mentioned that such employment opportunities were contributing to lower unemployment, attracting new people and maintaining the population in the area.

² Hellas Gold sustainability report 2018 <https://issuu.com/hellasgold/docs/sustainability-report-2018-en>

³ Payments have been provided in Euros in the report and have been calculated using the 2018 average EUR/USD rate.

2.3.3.2 Company Employment and Local Supply

As of September 2021, Hellas Gold employs about 1,649 workers, including 579 contracted workers. The direct workforce is approximately 84 percent local, and 11 percent female, while 86 percent of contracted workers are male.

At peak construction times, all subprojects will need between 720 and 970 contractor employees. At peak operation, the Project will employ an additional 1,019 direct staff and 402 contractors over baseline employment figures as of September 2021, totalling 2,089 direct staff and 981 contractors.

Hellas Gold is committed to maximizing local employment; conservative estimates provided by Hellas Gold indicate an average of about 30 percent of the construction workforce will be sourced locally (i.e., from the Municipality of Aristotelis) and 90 percent of the direct operational workforce will be local.

Hellas Gold is focused on using local supplier and contractor management; of the suppliers employed to date, 73.8 percent are national, while 11.7 percent are local. Also, from 2013 to 2018, a total of €123.3 million EUR was spent on payments to local suppliers.

2.3.3.3 Corporate Social Responsibility Activities

The Hellas Gold Corporate Social Responsibility (CSR) Framework sets out the strategy for implementation of the company's CSR objectives. More information on the procedure of Hellas Gold's corporate social responsibility is provided in the ESIA (Section 10.4.9.4, Hellas Gold Community Development Initiatives).

Hellas Gold ensures transparency of social support activities through a CSR committee that is responsible for evaluation and selection of requests for community support, as well as evaluation reports that are prepared upon completion of each activity. The CSR and Community Relations Department monitors the execution and successful completion of each social activity.

- The main pillars of the Hellas Gold CSR activities are health, education, community infrastructure, and services (according to the Hellas Gold Corporate Social Responsibility Framework).
- Hellas Gold collaborates with schools, universities, healthcare providers, enterprises, and cultural associations to design and implement societal support activities (Hellas Gold 2021). Hellas Gold CSR Evaluation criteria are:⁴
- Alignment with Eldorado Gold's strategic direction
- Community need
- Impact
- Ease of implementation

⁴ Hellas Gold CSR Evaluation criteria provided by email from Eldorado to ERM, on 10 January 2022

From 2012 to 2020, Hellas Gold had made regular contributions each year, with a maximum spend of roughly €4.7 million EUR in 2013. In 2020 Hellas Gold's CSR spend was about €1.62 million EUR. The geography of CSR spend varies by year; in 2020, Hellas Gold spent almost 80 percent of the CSR funds on requests from the Municipality of Aristotelis and adjacent municipalities, local associations, non-governmental organizations (NGO), civil protection bodies, and health structures. In 2020, approximately 12 percent of Hellas Gold's CSR spend was focused on community development initiatives in Stratoniki/Stageira. During previous years, areas of primary focus were in Stratoniki/Stageira and Barracks. In 2020, CSR spend was focused both on helping local communities and providing opportunities to people in communities with employment and education.

Under the 2021 New Investment Plan (Eldorado Gold 2021)⁵, the Company has committed to spend \$80 million USD in social investment over the 25-year life cycle of the Cassandra Mines. As part of this, Hellas Gold has also committed to develop and implement a new Community Investment Plan. The roll-out of the Community Investment Plan is expected to commence at the end of 2022.

Per negotiations with the Greek authorities, out of the total \$80 million USD, \$15 million USD will be invested within 5 years of resuming the Project development (which is expected to occur in 2022). The Hellas Gold Community Investment Plan will include strategic projects, focused on, but not limited to, the following:

- Construction of a pier in Ouranoupolis;
- Development of a mining museum at the former Bodossakis Mansion in Stratoniki;
- Creation of a cultural centre 'Aristotelion'; and
- Climate Change adaptation and mitigation measures.

The Municipality of Aristotelis was involved in the selection and validation of the above projects.

Additional \$65 million USD will be spent in community investment over the remaining 20 years of the Project lifetime, respectively an average of \$3.25 million USD will be spent on a yearly basis. These funds are currently planned to be allocated as follows:

- Local community investment within the Municipality of Aristotelis: 80 percent
- Local NGOs/Clubs/Associations: 10 percent
- Adjacent municipalities (Polygyros/Volvi): 5 percent
- Other Regional/National end-beneficiaries: 5 percent

The overarching thematic allocation of those funds will be spread across the following pillars:

- Education (20 percent)
- Healthcare (20 percent)
- Infrastructure (20 percent)
- Environment (20 percent)
- Public Services (10 percent)
- Arts & Culture (5 percent)
- Sports (5 percent)

⁵ The Cassandra Mines Investment Plan is a part of the Investment Agreement between Hellas Gold and the Hellenic Republic, signed in February 2021 (Eldorado Gold 2021).

Going forward, a Community of Interest Committee (CIC) will be set-up (see Table 6.4-1) and provide feedback on the priorities for development of the Social Aol, objectives for each funding pillar, and eligibility criteria for projects. These details will be incorporated into the Community Investment Plan, which will be communicated to the affected communities. CSR initiatives will be discussed in the regular meetings of the CIC (see Section 8.4, Reporting). To maintain transparency, Hellas Gold will provide regular reports to the CIC throughout the year, including how the community investment projects have been selected and how the implementation is progressing. Annual reports on CSR activities will include the total budget spend, projects, and outcomes against objectives.

CHAPTER 3 LEGISLATIVE FRAMEWORK

The current SEP, including the Grievance Mechanism (see Chapter 7), is designed to be aligned with national Greek requirements and with EBRD PR 10. To date, stakeholder consultation has been focused on compliance with Greek legislative requirements. Going forward, financial standards have been incorporated into engagement planning and procedures.

3.1 National Requirements

Greece has adapted the European Legislation for environmental impact assessment (with the exception of the new EIA Directive – 2014/52/EU), and disclosure and engagement.

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; and
- L. 3422/05, on ratification of the Aarhus Convention (Directive 2013/35/EC).

Under the Greek EIA process established in the latest legal provisions (Joint Ministerial Decision 1649/45/2014), stakeholder engagement is only required once the regulatory EIA is submitted to the Competent Authority (Division of Environmental Permitting of the Ministry of Environment and Energy), both in hard copy and through the Electronic Environmental Registry. The stakeholder engagement process starts after the check of completeness of the submitted regulatory EIA by the authority.

At that stage, three consultation mechanisms occur in parallel:

1. **Authorities' consultation:** The regulatory EIA is provided to various authorities (central and regional authorities, plus the Regional Council) for their consultation response. Authorities have 30 days to provide an answer to the Division of Environmental Permitting. If some authorities do not provide an answer, the Division of Environmental Permitting can decide to involve the Central Environmental Permitting Council (KESPA, in Greek).⁶
2. **Open meetings organized by municipalities and Regional Councils:**⁷ The regulatory EIA is presented by the Project Proponent to the Regional Council and municipalities; the responsible

⁶ Time provided by law is indicative. Through the process, authorities can be granted more time to answer.

⁷ These can be seen as 'public hearings' but not formally called as such in Greek Legislation.

regional expert also presents the scientific opinion of the authority. The Regional Council and municipalities are then asked to endorse the regulatory EIA. Citizens can participate in these meetings; however, there is no formal feedback mechanism. The stakeholders have the option of either sending their opinions in writing or asking to present them in the public hearing meeting. This process occurs in parallel to the Authorities' consultation. The Government has the right to organize more public hearings, if necessary.

- Electronic Environmental Registry:** An online platform is available for interested stakeholders to submit comments on the regulatory EIA and the Project; this platform allows all stakeholders and the public to express their opinion.

Once it has received all comments, the competent authority provides feedback to the Project Proponent. The final issued permit constitutes the Decision of Approval of Environmental Terms issued by the Competent Authority.

According to the Greek EIA legislation (Joint Ministerial Decision 1649/45/2014), the public consultation process must last at least 30 days, although in practice it can last longer. Provisions regarding duration and deadlines are generally agreed upon on a case-by-case basis or through a joint working group, if established. In practice, the whole regulatory EIA consultation process can extend from 6 to 9 months.

The above procedure is summarized on Figure 3.1-1.

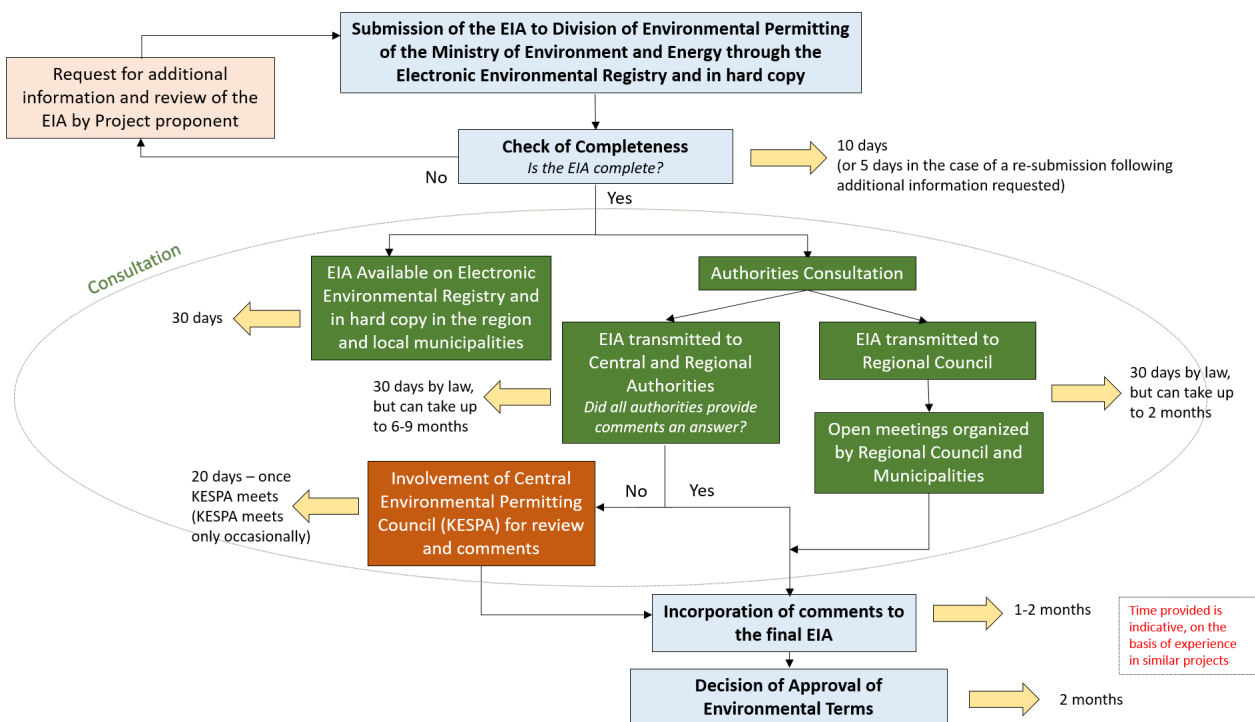


Figure 3.1-1: Greek EIA Process

3.2 International Finance Institutions Requirements

The Project is seeking international financing and is considering EBRD as a potential financier. As a result, the Project will follow EBRD standards. The EBRD is committed to promoting 'environmentally sound and sustainable development.' To this end, the EBRD has established a comprehensive set of Performance Requirements for key areas of environmental and social sustainability that projects are required to meet (EBRD 2019). For the purposes of this SEP, PR 1: *Assessment and Management of Environmental and Social Risks and Impacts*, and PR 10: *Information Disclosure and Stakeholder Engagement* will be used as part of the SEP. These Performance Requirements are outlined in Table 3.2-1.

Table 3.2-1: Key Aspects of EBRD PR 1 and PR 10

Environmental and Social Appraisal Management (PR 1)	Information Disclosure and Stakeholder Engagement (PR 10)
To identify and assess environmental and social impacts and issues, both adverse and beneficial, associated with the Project.	To identify people or communities that are or could be affected by the Project, as well as other interested parties. To identify individuals and groups that may be differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status.
To adopt measures to avoid, or where avoidance is not possible, minimize, mitigate, or offset/compensate for adverse impacts on workers, affected communities and the environment.	To ensure that such stakeholders are appropriately engaged on environmental and social issues that could potentially affect them through a process of information disclosure and meaningful consultation throughout the life of the Project. To provide workers and Project-affected communities with relevant information, instruction, and training relating to health and safety hazards, risks, and protective and preventive measures.
To identify and, where feasible, adopt opportunities to improve environmental and social performance.	To maintain a constructive relationship with stakeholders on an ongoing basis through meaningful engagement during Project implementation.
To promote improved environmental and social performance through a dynamic process of performance monitoring and evaluation.	To provide regular reports to interested stakeholders on its environmental and social performance. To monitor changes to the Project and update the SEP accordingly.

The EBRD Performance Requirements require that stakeholder engagement provides stakeholders with access to timely, relevant, understandable and accessible information. Engagement will be conducted in a meaningful, effective, inclusive, and culturally appropriate manner, free from manipulation, interference, coercion, intimidation, and retaliation. Throughout the engagement process, relevant Project information will be disclosed and meaningful consultation will take place to help stakeholders understand the risks, impacts, and opportunities of the Project, and allow them to raise their opinions, concerns, and complaints throughout the life of the Project.

The Performance Requirements outline the following requirements as part of engagement during Project preparation and implementation.

- Labour and Working Conditions (EBRD PR 2)
 - Document and communicate to all workers their rights and working conditions, such as wages, benefits, and work conditions.
 - Engage with workers' representatives or organizations and provide them with information needed for meaningful negotiation in a timely manner throughout the project life cycle.

Identify migrant workers and ensure that they are engaged on substantially equivalent terms and conditions to non-migrant workers carrying out the same work.

- If retrenchment occurs, provide reasonable notice of changes to employment conditions to the unions concerned (where they exist), and to workers and their representatives and, where appropriate, relevant public authorities. The outcome of the consultations will be reflected in the final retrenchment plan.
- Health, Safety, and Security (EBRD PR 4)
 - Provide workers and affected communities with relevant information, guidance and training relating to health and safety hazards, risks, protective and preventive measures and emergency arrangements that are necessary for their safety throughout the Project.
 - Consult affected communities and relevant government agencies about the proposed measures before they are finalised and take public concerns and comments into account.
 - Review the measures regularly, and engage affected communities and agencies on an ongoing basis, informing them on the status of implementation of plans and commitments, results, and discuss with them any material changes needed to the plans, in advance of changes.
 - Information disclosed may be summarised (maintaining a sufficient level of detail to allow stakeholders to fully understand the risks, potential impacts, and measures to be taken) and/or redacted to remove confidential information.
- Land Acquisition, Restrictions on Land Use, and Involuntary Resettlement (PR 5):
 - From the earliest stages and through all resettlement activities, involve affected men and women, including host communities. Provide the opportunity for affected persons to participate in the discussion regarding the resettlement process.
 - Additional requirements apply to consultations that involve individuals belonging to vulnerable groups (including people who, by virtue of gender identity may be more adversely affected by Project impacts than others). In particular, the company will take necessary actions to ensure that vulnerable groups are not disadvantaged in the consultation process, are fully informed and aware of their rights, and are able to benefit equally from Project-related activities.
 - Consultation will continue during the implementation, monitoring, and evaluation of compensation payment and resettlement so as to achieve outcomes consistent with the objectives of this Performance Requirement.
- Biodiversity Conservation and Sustainable Management of Living Natural Resources (PR 6)
 - Biodiversity action plans should be developed in consultation with relevant stakeholders, including government, external experts, local/international conservation organisations, and Project-affected communities.
- Indigenous People (PR 7)
 - PR 7 requires companies to engage in informed consultation and participation with the affected indigenous communities, implement a specific grievance mechanism, and identify

appropriate modalities for compensation and benefit-sharing. It has been determined that, per the criteria in PR 7, no Indigenous People are present in the social Aol and therefore PR 7 does not apply to this project.

- Cultural Heritage (PR 8)
 - Conduct meaningful consultation and provide Project information to all key stakeholders to: (1) identify cultural heritage likely to be affected; (2) understand the significance of cultural heritage to stakeholders, including local communities; (3) assess the impacts and risks; (4) apply the mitigation hierarchy; and (5) identify opportunities for potential community benefit.
- Information Disclosure and Stakeholder Engagement (PR 10)
 - Stakeholder identification and analysis:
 - Identify the various individuals or groups who (1) are affected or likely to be affected (directly or indirectly) by the Project, or (2) may have an interest in the Project.
 - Identify the individuals and groups that may be differentially or disproportionately affected by the Project due to a vulnerable status, and develop/implement additional measures required to adequately engage with vulnerable people/groups.
 - Engage stakeholders in a scoping process to support identification of the key issues to be assessed as part of the ESIA process.
 - Stakeholder engagement plan:
 - Identify and engage stakeholders to provide comments and recommendations on the Project, including this draft SEP.
 - Explain how communication and consultation with the identified stakeholders will be handled throughout Project preparation and implementation (including grievance mechanism).
 - Information disclosure:
 - Disclose relevant Project information to stakeholders to inform them about the potential risks, impacts, and opportunities from the Project in a timely manner including:
 - Purpose, nature, and scale of the Project
 - Duration of the Project
 - Risks related to environmental, health and safety, social impacts, and benefits
 - Mitigation measures to avoid or minimise potential impacts
 - Envisaged consultation process
 - Time and location of envisaged public meetings
 - Disclose in the local language and in an accessible, free, and appropriate manner
 - Meaningful consultation:

- Begin consultation early in the Project planning process to gather initial views on the proposed Project and inform the Project design; consultation will continue on an ongoing basis throughout the Project life cycle.
- Undertake consultation in a manner that is inclusive and culturally appropriate
- Base consultation on the principle of two-way, informed communication that allows feedback and concerns to be addressed appropriately.
- Project Implementation and external reporting:
 - Provide ongoing information to identified stakeholders.
 - Provide additional information at key stages of the Project life cycle, in line with public interest and feedback.
 - Provide specific reports to affected communities, including updates on issues that involve ongoing risk or impact on them.
 - Encourage to disclose public reports to external stakeholders on environmental and social performance.
- Grievance Mechanism (GM):
 - Establish and implement a grievance mechanism to receive and facilitate resolution of stakeholders' concerns and grievances about the Projects' environmental and social performance.
 - Provide an effective grievance mechanism for workers (and their organizations, where they exist) to raise workplace concerns. In cases when the third-party workers are involved and the third party is not able to provide a grievance mechanism, the company will provide an effective grievance mechanism to serve workers engaged by the third party. The grievance mechanism should address concerns promptly and effectively, using an understandable and transparent process that is culturally appropriate and accessible.
 - Regularly assess effective implementation of the GM and additional measures to be undertaken if needed during Project life cycle.

All projects financed by the EBRD will be structured to meet the requirements of the EBRD Environmental and Social Policy that includes the 10 Performance Requirements mentioned above, which are mandatory standards related to key areas of environmental and social sustainability. In addition, EBRD's Independent Project Accountability Mechanism (IPAM) is an independent last resort tool that aims to facilitate the resolution of social, environmental, and public disclosure issues raised by Project-affected people and civil society organisations about EBRD-financed projects. IPAM is meant to be used to resolve issues among Project stakeholders; determine whether EBRD has complied with its Environmental and Social Policy and the Project-specific provisions of its Access to Information Policy; and, where applicable, address any existing non-compliance with these policies, while preventing future non-compliance by EBRD.

3.3 Planned Integration of International and National Requirements

Hellas Gold's objective is to carry out the overall impact assessment process, including the EIA prepared to comply with Greek regulations and the ESIA to meet the EBRD requirements, in an integrated and transparent manner, involving interested and affected stakeholders. To avoid confusion, the EIA and ESIA are being conducted separately, but in parallel. Findings have been compared and validated across these studies to confirm consistency and accuracy.

Detailed engagement activities under the regulatory and EBRD engagement processes are provided in Chapter 6, Engagement Program and Approach, and plans for integration of the EIA and ESIA engagement processes are described in this SEP, Section 6.2.3, Planned Engagement During the ESIA Disclosure Process.

3.4 Eldorado's Sustainability Integrated Management System (SIMS)

Eldorado's Sustainability Integrated Management System (SIMS) is founded and fostered on Eldorado's values, and sets minimum performance requirements for all sites across the areas of health and safety, environment, social performance, security, and general sustainability performance. SIMS is aligned with the Mining Association of Canada's Towards Sustainable Mining program (TSM) and the World Gold Council's Responsible Gold Mining Principles (RGMP), which are leading global standards for responsible mining. Through the implementation of SIMS, Hellas Gold has a clear set of performance-based standards to which it must adhere.

In 2020, Eldorado Gold began developing SIMS with the active participation of sustainability experts from across operating regions, including Hellas Gold. Eldorado launched SIMS globally in 2021 and has undertaken a campaign of training and awareness across sites throughout the year. SIMS Social Performance (SP) 2 refers to stakeholder engagement and includes the following requirements:

- SP 2.1: A documented community engagement and dialogue system will be in place to transparently inform communities of company activities and performance, actively engage them in dialogue and participation on issues of concern to them, and identify how issues might be addressed through measures such as mitigation, compensation, or other actions in conformance with the Mining Association of Canada TSM Indigenous and Community Relationships Protocol.
- SP 2.2: Processes will be in place to identify the needs of communities of interest (COI) for capacity building to allow them to engage in effective participation on issues of interest or concern to them.
- SP 2.3: Internal and external reporting on community engagement and dialogue will be open, transparent, and documented, including responses to COI concerns.
- SP 2.4: Communications will be written in the local language for COI (if requested) and in language that is clear and understandable to COI.
- SP 2.5: The stakeholder management process will be inclusive of all relevant stakeholders, including those that are neutral or in opposition to site activities and those that have a direct and indirect impact related to site activities.

- SP 2.6: Engagement plans will be documented and reviewed and updated on an annual basis or when there are material changes to the site or stakeholders. Progress on implementing these plans will also be documented.
- SP 2.7: Interactions (such as meetings, emails, and phone calls) with stakeholders and resulting actions on the part of Eldorado will be logged.
- SP 2.8: Sites will identify appropriate milestones, key performance indicators, or other measures and track actual progress and impacts to ensure that goals and legal commitments of agreement are being met.
- SP 2.9: Community agreements and progress towards their compliance will be documented.

Hellas Gold conducted a self-assessment against the SIMS standards in September 2021. The self-assessment included training provided for multidisciplinary audit teams comprised of over 30 employees from across the Cassandra Mines with the direct support of the SIMS Control Team of Eldorado's sustainability leaders. The self-assessment was conducted over 5 days and included field inspections, interviews, and document reviews to assess compliance with the SIMS standards. The SIMS self-assessment engaged all Cassandra Mines and Hellas Gold management. Following the self-assessment, Hellas Gold has begun developing a corrective action plan, which will advance the implementation of SIMS standards and support teams as SIMS matures as a tool for driving sustainability performance. The SIMS self-assessment also identified areas of best practice across the Cassandra Mines, including the areas of tailings management, environmental monitoring and biodiversity and reclamation. In future years, the Cassandra Mines will participate in external SIMS audits, which will also be used to assess compliance with TSM and the RGMPs in support of Hellas Gold's commitment to responsible mining.

Following the self-assessment, a number of corrective actions have been defined and are reflected, as applicable, in the Action Plan (Annex III) to this SEP. These include the following:

- Develop a process/plan to fill job openings with local candidates. Where local skills do not meet site needs, the strategic plan will include components to train and build local capacity.
- Develop a formal and comprehensive social baseline study. This has been completed as part of the ESIA studies. The social baseline study will be updated every 5 years.
- Develop an external report for community engagement.
- Develop a clear process to receive, manage, and respond to community grievances, comments, and requests in conformance with Level A of the TSM Indigenous and Community Relations Protocol.
- Develop a Grievance Management Framework.
- Develop a tool to track and assess the results and impacts of the community investment against site/country/corporate social strategy and objectives.

Going forward, corrective actions from the self-assessments will continue to be included in the Action Plan for engagement, and progress made in implementing the corrective actions will be disclosed in the Annual Report (see Section 8.4, Reporting).

CHAPTER 4 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 a project.
- Interested parties – Those who have an interest in a project.
- Influential parties – Those who are able to influence the outcome of a project, either positively or negatively.

Internal stakeholders are people whose interest in a company comes through a direct relationship, such as employment, ownership, or investment. External stakeholders are those who do not directly work with a company but are affected somehow by the actions and outcomes of the business or have an interest in the outcomes.⁸

For the purposes of this SEP, stakeholders have been identified primarily based on the knowledge and understanding of the local context before the Project has commenced.

Stakeholder mapping pays particular attention to:

- Individuals or groups who may have different concerns and priorities about Project impacts, mitigation mechanisms, and benefits, and who may require different or separate forms of engagement; and
- Individuals or groups who may be disadvantaged or vulnerable because of their particular circumstances.

4.1 Methodology

Hellas Gold completed an extensive stakeholder identification and mapping exercise in 2020, including a wide range of national, regional, and local stakeholders with different views about the Project. This work categorized stakeholders by level of influence and level of interest.

A systematic approach has been adopted to review and expand this initial stakeholder mapping, including: (1) definition of the Project's Social Aol (as discussed above under Section 2.3.1, Social Area of Influence); (2) scoping of potential Project impacts and (3) identification of additional stakeholder groups who may be affected by the Project.

Hellas Gold validated and refined the stakeholder mapping in 2021 based on the fieldwork engagement activities conducted in the context of the ESIA in September and October 2021.

Mapping was based on the following parameters:

- **Level of Influence** – defined as the ability of the stakeholder to affect or influence decision-making processes and outcomes related to the Project; and

⁸ <https://www.investopedia.com/terms/s/stakeholder.asp>

- **Level of Interest in the Project** – defined as the willingness of the stakeholder to be informed and actively participate in the engagement process for the Project.

Mapping stakeholders in this manner allows for the development of specific engagement strategies and tools for each of group of stakeholders, based on the following considerations:

- **Unaware:** Unaware of the Project and potential impacts.
- **Resistant:** Aware of the Project and potential impacts but resistant to any changes that may occur as result of the work or outcomes of the Project. These stakeholders will be unsupportive of the work or outcomes of the Project.
- **Neutral:** Aware of the Project, but neither supportive nor unsupportive.
- **Supportive:** Aware of the Project and potential impacts and supportive of the work and its outcomes.
- **Leading:** Aware of the Project and potential impacts and actively engaged in ensuring that the Project is a success.

Through the EIA and ESIA processes and, further on, the development and operation of the Project, stakeholder mapping and analysis will continue to be reviewed and refined as a better understanding of key influential and interested stakeholders is achieved and new stakeholders are identified.

4.2 Stakeholder Mapping

4.2.1 Communities of Interest

As described in Section 2.3.1 Social Area of Influence, the Social AoI defined for the Project includes the municipalities and communities in Table 4.2-1.

Table 4.2-1: Communities in the Social Area of Influence

Municipality	Municipal Unit	Directly Affected Community	Indirectly Affected Community
Municipality of Aristotelis	Municipal Unit of Arnaia	Local Community of Paleochori Local Community of Neochori Local Community of Varvara	Municipal Community of Arnaia
	Municipal Unit of Panagia	Municipal Community of Megali Panagia	N/A
	Municipal Unit of Stageira-Akanthos	Local Community of Olympiada Local Community of Stageira Local Community of Stratoniki Local Community of Stratonii	Municipal Community of Ierissos
Municipality of Volvi	Municipal Unit of Rentina	N/A	Municipal Community of Stavros

Pre-ESIA engagement has been conducted by Hellas Gold in those communities (described in Chapter 5, Past Engagement). More recently, ESIA-related engagement has been undertaken by

Hellas Gold and its consultants in the same communities (described in Section 6.2, Current ESIA/EIA Engagement Process).

In addition to direct engagement, stakeholders have also been engaged indirectly through public dissemination of information on the Hellas Gold website, as well as through printed and online media.

4.2.2 Key Stakeholders

Table 4.2-2 summarizes stakeholder identification and mapping results for key Project stakeholders. It is based on data obtained through the ESIA baseline engagement activities carried out in September and October 2021, as well as Hellas Gold's prior understanding of the area.

Stakeholder identification is an ongoing process, requiring review and update. The identification of Project stakeholders and vulnerable groups will be expanded and refined throughout the Project progress. Hellas Gold is ensuring ongoing tracking of Project stakeholders through a Stakeholder Register.

If you think you should be in the list of stakeholders, please email:

GR-grievances@eldoradogold.com

Table 4.2-2: Overview of Key Project Stakeholders

Stakeholder Category	Interest in the Project ⁹	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

⁹ Interest in the Project were completed through background research on stakeholders as well as field-work in September-October 2021. Stakeholder interests will be documented and updated through stakeholder mapping and reporting on a regular basis based on the SEP.

Stakeholder Category	Interest in the Project?	Stakeholder Groups
		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 unrest, emergency planning	<ul style="list-style-type: none"> • Greece Civil Protection • Police Department, Halkidiki
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
Financiers	Assessment of risks	<ul style="list-style-type: none"> • EBRD
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"> • Community president - 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 • Community president - Arnaia • Members of Local Council - Arnaia • Community president - Ierissos • Members of Local Council - Ierissos • Community president - 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 Straton Port Station/recreational port)
Opposition Parties – Municipal Level	Interest in environmental and social issues	<ul style="list-style-type: none"> • Ischyros Aristotelis – opposition party at the local Municipal Council • Apallagi • Symmachia Politon Gia To Dimo Aristotelis • 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

Stakeholder Category	Interest in the Project ⁹	Stakeholder Groups
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 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 Volunteering group for Community Development of Megali Panagia 'Anagenessi Gynaikon' • 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 (Charoula Zika)
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 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 Cassandra 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"> • Palaiochori Public Medical Centre • Medical Centre Vasilis Panagiotidis, Stratoni • Medical Centre Stavros

Stakeholder Category	Interest in the Project ⁹	Stakeholder Groups
Civil Protection	Impacts of the Project on local safety; civil unrest; emergency planning	<ul style="list-style-type: none"> Local Police of Arnaia
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 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"> Two workers' unions for underground mining operations (about 500 members in total) One workers' union for surface mining operations (540 members) 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) Two unions representing workers occupied in Hellas Gold's contractors Two unions representing workers occupied in Hellas Gold's contractors Secondary Trade Union of Halkidiki (Centre of Workers & Employers) of Paleochori
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

AUTH = Aristotle University of Thessaloniki; E&S = Environmental and Social; DIPA = Environmental Permitting Department; NGO = non-governmental organization; SEE = Environmental inspection body; WWF = World Wildlife Fund

4.2.3 Vulnerable Groups

According to EBRD PR 1, 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.

To create an inclusive engagement process, it is important to identify individuals and groups who may find it more difficult to participate and those who may be 'directly and differentially or disproportionately affected by the Project because of their disadvantaged or vulnerable status.'¹⁰

Hellas Gold's new Social Performance policy states the importance of engaging with community members, including traditional leaders, in a culturally appropriate manner and be alert to negative impacts on women, children, indigenous peoples, and other potentially vulnerable or marginalised groups.

Table 4.2-3 provides an overview of the groups that may be considered vulnerable, based on screening and fieldwork engagement activities conducted in September and October 2021. 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. This identification will be refined through implementing the SEP.

Table 4.2-3: Potentially Vulnerable or Marginalised Groups in the Social Aol

Vulnerable Group ^a	Description and Relationship to the Project
Women and particularly female heads of households, widows, and divorcees	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. Due in part to traditional gender roles, as well as risks of higher vulnerability of women, GBVH is an issue in Greece – see Section 10.4.16.4, Gender Equality and Gender-Based Violence and Harassment) of the ESIA studies. Women/female heads of household have been identified as being vulnerable within the Aol. They are less able to access employment and economic benefits of the Project, and may be susceptible to changes in the security context.
Children	To access assets/resources, children are often reliant on older members of the household or community. When a child is not adequately represented by an adult, from a low-income family, or an ethnic minority, they may be vulnerable to exploitation within the community or workplace. Children are present throughout the Aol. Considering the local context and labour market regulations, they are unlikely to be directly affected by employment aspects of the Project, but may be more vulnerable to health impacts of environmental changes (e.g., air emissions) generated by the Project. They may also be vulnerable to changes in the security context, associated with opposition.
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 Aol. Impacts are likely to be limited to employment and expectations of economic benefits from the Project.
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 Aol. Potential impacts may occur through environmental changes (e.g., air emissions) generated by the Project. The elderly may also be affected by changes (real or perceived) in the security context, associated with opposition.

¹⁰ International Finance Corporation Performance Standard 1 (IFC PS 1): Assessment and Management of Environmental and Social Risks and Impacts; para. 12.

Vulnerable Group ^o	Description and Relationship to the Project
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 Aol, and are likely to be directly affected by the Project's employment opportunities, including negatively due to unequal opportunity (or positively if they can access it) and by localised price inflation caused by the Project.
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. A small number of persons with disabilities have been identified within the Aol, but are unlikely to be directly impacted by the Project.

GBVH = gender-based violence and harassment

^o Screening assessment and fieldwork conducted in September and October 2021 determined that a limited number of ethnic minority households have been identified within the Aol, but all are considered well integrated into local society.

4.2.4 Gender Considerations During Engagement

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 seek to structure engagement activities to provide opportunities for young girls and women to actively participate in a 'safe space.' This will be done through individual or small-group women-only discussions to allow participants time and space to share views.
- 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 to share 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 timing of paid work, livelihood activities, childcare, and other household duties in planning engagement so that the process can be more inclusive.

CHAPTER 5 PAST ENGAGEMENT

5.1 Historic Engagement Activities (1950s to 2010s)

The Social Aol has a long history of mining; gold mining in Halkidiki dates back to the 6th century BCE (Mining Greece Undated), and a variety of mining companies have operated the Cassandra Mines since the 1950s (Hellenic Fertilizer Company, TVX and more recently, Hellas Gold). Relations with these entities have been characterised by a high degree of 'dependency' of communities on a 'paternalistic' mine. Under this historical model, engagement with local stakeholders has focused on opportunities of employment and local benefits (infrastructure, security, and other social support) for some communities, which have depended on the mine for economic development.

In addition to the historical dynamic of dependency/paternalism, there has been a long history of opposition to mining activities from some stakeholders dating back to the 1980s. In 1996–1997 (under TVX Gold), opposition from some local area residents to the reopening of the mine and development of new facilities led to open confrontation (The Mackenzie Institute 1998). Tension between the mine (still under TVX Gold) and Project opponents continued into 2003, when TVX Gold filed for bankruptcy (Omniatv English 2014).

Hellas Gold (European Goldfields) took ownership of the Project in 2003; between 2004 and 2010, engagement was largely conducted on an ad-hoc basis, and relations with communities seemed to stabilise somewhat. This lasted until approximately 2011, when Hellas Gold announced its plan for investment and new developments at Olympias, Skouries, and Stratoni. Local support for these plans was generally divided between those who supported the employment and economic opportunity associated with the Project, and those who advocated for protection and promotion of natural heritage and tourism, and protection against environmental impacts.

Protests against mining activities intensified in the early- to mid-2010s, including violent demonstrations, arson at the Skouries construction site, road blockages, and vandalism, notably the burning of Ierissos town hall. Police officers were reportedly injured and criminal charges were laid (Omniatv English 2014). Several stakeholders engaged in the September and October 2021 ESIA engagement meetings (both supportive and opposed to the Project) described this period as a dark one, characterized by social tension and community division.

Following the acquisition of European Goldfields by Eldorado Gold in 2012, a stakeholder mapping exercise was conducted, documented as Eldorado Stakeholder Mapping: Analysis and Recommendations, 2013 (ERM 2018). This exercise focused on stakeholders who were supportive of the Project and senior government opposition. Stakeholder engagement continued to be characterized by donations to local communities and associations in an ad hoc manner until 2018, when Hellas Gold (Eldorado) prepared a more comprehensive Stakeholder Expectations Document, recording the expectations and perceptions of various stakeholder groups such as employees, contractors, workers' unions, suppliers, business unions, the local community, local authorities, public institutions, academic institutions, NGOs, state/administration institutions, and customers. The Hellas Gold team was focused on CSR activities and day-to-day engagement.

Through the various opposition movements, protestors voiced concern about environmental protection, notably the environmental impacts of gold metallurgy associated with the development of the Skouries deposit. Environmental issues that were raised included the effects of non-cyanide gold metallurgy method called "flash smelting", the destruction of aquifers, the loss of cultural heritage (antiquities), the production of asbestos dust, seismic risks. Some opponents also claimed that investors were not paying taxes. In response to those perceived potential impacts, the company commissioned additional studies and legal actions, arguing that ultra-modern mining and processing methods were used, thus minimizing or even eliminating environmental impacts. Monitoring of the main environmental indicators (including air-dust, vibrations, soil contamination, noise levels, meteorological indicators; solid waste, surface water, sea water quality indicators; ground water, drinking water, and mine water indicators, and seismicity indicators) was established at all main Project facilities in 2006 (the first year of operation of Cassandra Mines by Hellas Gold). Since 2006, technical reports with environmental monitoring data have been submitted annually to a number of authorities and interested parties, including the Municipality of Aristotelis. These environmental monitoring results became available to the public through the "Environmental Monitoring Results Viewer" application in 2016 (Hellas Gold 2017).

National environmental NGOs have also periodically voiced their concerns about the Project. In March 2021, 11 national and international environmental NGOs including World Wildlife Fund (WWF), Greenpeace, and the Royal Society for the Protection of Birds (RSPB), published an open letter voicing their concerns and stating that the ratification of the contract with the company Hellenic Gold overturns the environmental acquis¹¹ and conceals possible violations of EU law (a copy of this the letter is provided in Annex I).¹²

Earlier in March 2021, during the meetings of the Standing Committee on Production and Trade of the Hellenic Parliament, stakeholders were invited to present their views on the ratification of the new business plan to the Hellenic Parliament. According to available minutes of the meeting, Kallisto NGO - one of the 11 international and national NGOs that signed the open letter regarding the Project later in March 2021- raised the following concerns:

- Consultations for the new business plan did not include engagement with the public.
- Selection of an independent environmental inspector by the Project is viewed as an abatement of the Greek State's power on exercising environmental control.
- An extension of the surface mining in Skouries and ongoing impacts on the coastal zone of Olympiada–Stratoni.
- Ongoing mining activities under Stratoni, where cracks have been identified in housing and community infrastructures.
- The Kokkinolakkas Extractive Waste Management Facility and its location in relation to active faults in the area.

¹¹ The environmental acquis is the bulk of all EU environmental legislation. The acquis comprises around 300 Directives and Regulations, including daughter directives and amendments.

¹² The original letter is available here

<https://www.greenpeace.org/greece/issues/perivallon/44175/topothetisi-perivallontikon-organoseon-gia-ti-symvasi-tis-elliniki-s-dimokratias-me-tin-etaireia-ellinikos-xrysos/>

- The distribution and population status of otter, wolf, and jackal species were not adequately addressed in the 2011 EIA; also, relevant impacts were not adequately assessed and proposed mitigation measures for their conservation were not enough.

Hellas Gold responded to the open letter from NGOs in April 2021, describing Hellas Gold commitments and investments aimed to further reduce the environmental impacts of the Project; supporting material was appended to the letter (a copy of this letter is provided in Annex I). As of February 2022, no further correspondence between listed NGOs and Hellas Gold has taken place.

ESIA Section 10.4.14, Security, provides an overview of mining activity security issues and the timeline of social conflict related to mining in the Social Aol. ESIA Section 10.6.9, Impacts on Security and Human Rights describes potential Project impacts on security and relevant mitigation measures.

5.2 Pre-ESIA Engagement Activities (2020–2021)

Hellas Gold completed an SEP in 2020, involving a comprehensive Stakeholder Mapping exercise conducted in 2020 and 2021 (Hellas Gold 2021a and 2021b). A second SEP (this version) was developed in 2021, in alignment with the EBRD Performance Requirements. Stakeholder engagement at the community level has primarily been associated with CSR activities such as sponsorships, donations, and emergency and technical support through the Coronavirus disease 2019 (COVID-19) pandemic.

In total, 118 meetings – mostly in-person meetings – with over 140 stakeholders took place between January 2020 and August 2021, including meetings with the following stakeholders:

- State representatives at the regional level, notably delegates of the Ministry of Health and the Ministry of Education as well as the Deputy Minister of Macedonia/Thrace;
- Mayor, Deputy Mayors and school councillors of the Municipality of Aristotelis;
- Presidents and councillors from local communities of the Municipality of Aristotelis, including from Megali Panagia, Paleochori, Neochori, Olympiada, Stageira, Stratoni, Stratoniki;
- Stakeholders from the health and safety sector including Halkidiki hospital managers and the Hellenic Emergency Response Service;
- Labour union representatives, notably the presidents of the Underground Miners' Union and the Megali Panagia Labour Union;
- Local religious leaders, notably the Bishop from Arnaia who is the religious leader of the area;
- Other local associations such as the Proathonikos Tourism Association and the Stratoni local women association; and
- Local business owners.

Other than these meetings, meetings conducted since the acquisition of the mine in 2004 have not been formally recorded.

5.3 Summary of Past Concerns

Past concerns have been identified based on a review of publicly available data sources and reports from Project personnel with knowledge of the area. Through planned and ongoing engagement with stakeholders during the ESIA process, stakeholder perceptions and concerns were validated, updated, and more clearly characterized.

Key concerns raised during engagement held prior to September 2021 include:

- Employment of local population;
- Environmental impacts of gold metallurgy, notably on groundwater and surface water;
- Past environmental legacy associated with tailings and water management;
- Water contamination and sediment pollution at Stratoni port facilities, affecting fishing activities and the local tourism development potential associated with the beach (these concerns are connected with the past submarine disposal of tailings and are not connected with the current operation of the Stratoni Port facilities by Hellas Gold);
- Increased earthquake risks associated with underground mining activities weakening the ground;
- Increased traffic and road accidents;
- Loss of cultural heritage;
- Asbestos dust;
- Unfair distribution of Project benefits, notably associated with the payment of taxes and royalties;
- Conflicting regional development orientations, notably around tourism in the Stratoni beach area; and
- Lack of communication and insufficient/irregular engagement with stakeholders.
- Public reports by Amnesty International also refer to alleged mistreatment by local police and private security including arbitrary arrests, violence, and excessive force on various occasions during demonstrations opposing the mine held approximately 10 years ago.

Concerns raised through ESIA engagement activities in September and October 2021 are summarized and presented in ESIA Section 6.2.1, Baseline and Impact Assessment Engagement.

Historical mining operations in the region have resulted in accumulation of environmental and social impacts. While many stakeholders are aware of cumulative impacts from legacy mining, these are not fully understood by the general population. Insufficient information has been shared about the nature and extent of cumulative impacts, as well as rehabilitation activities and management measures that have been undertaken by Hellas Gold.

Limited communication, past tensions, social divisions, and widespread misinformation over the years have resulted in an erosion of trust from communities in the willingness and ability of the Project to manage environmental impacts and social benefits.

These legacy/historical issues will be considered while designing the consultation and disclosure processes for the Project.

CHAPTER 6 ENGAGEMENT PROGRAM AND APPROACH

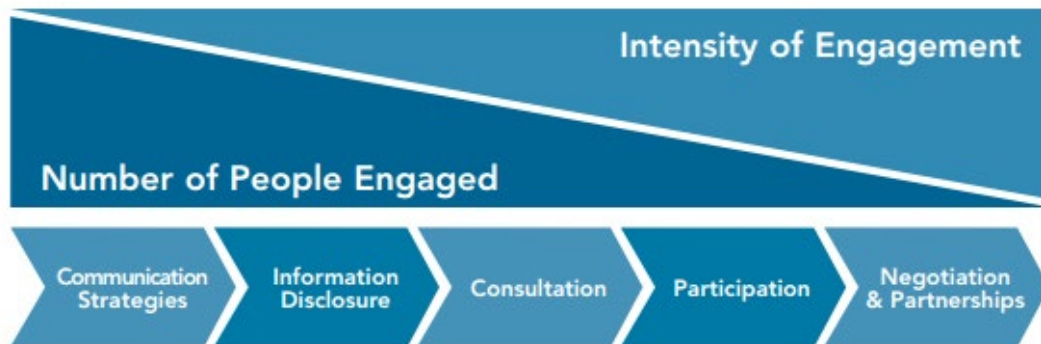
This chapter presents an overview of engagement activities planned at all phases of the ESIA, as well as throughout the construction/operation phase. It also provides the details of the strategies to be implemented throughout the engagement process.

6.1 Objective

Stakeholder engagement is an essential element for the successful implementation of the EIA/ESIA and the Project itself. Effective stakeholder engagement allows Project-affected people and other concerned individuals, groups, and organizations to be informed about Project activities and anticipated impacts, and provides opportunities for their meaningful participation in Project planning, implementation, and monitoring. It is an ongoing process aimed at building and maintaining strong and constructive relationships over time – beginning during the earliest stages of Project development and continuing throughout the Project life cycle.

The objective of future engagement activities will be to disclose information about impacts and management measures that will be implemented by Hellas Gold; one of several steps being taken to re-establish trust with stakeholders.

The intensity and frequency of Hellas Gold's stakeholder engagement will be commensurate to the Project's development schedule as well as activity type and risk while generally following the spectrum of stakeholder engagement outlined on Figure 6.1-1.



Source: IFC 2007

Figure 6.1-1: Spectrum of Stakeholder Engagement

6.2 Current ESIA/EIA Engagement Process

6.2.1 Baseline and Impact Assessment Engagement

In support of the supplementary ESIA studies and in alignment with the EBRD Performance Requirements, key stakeholders were consulted during two rounds of engagement: 13 September to 4 October 2021 and 19 to 23 October 2021.

Hellas Gold organized engagement meetings that included Hellas Gold representatives and the ESIA consultants. Meetings took the form of key stakeholder interviews and focus groups designed to facilitate open conversation and information sharing.

The purpose of engagement meetings was to:

- Share relevant information about the Project and the forthcoming EIA/ESIA process including planned activities and potential risks and impacts.
- Understand concerns, grievances, and questions that stakeholders may have about the Project. Address these where possible, or commitment to providing a response.
- Collect additional baseline information, either as qualitative input to local conditions, or to fill specific gaps in available local-level data.
- Understand opposition to the Project.
- Receive feedback from stakeholders about Project plans, including the proposed design and anticipated impacts.
- Share plans for combined disclosure of the regulatory EIA and ESIA, and additional ways for stakeholders to participate in the ongoing engagement and decision-making process.

In addition, tailored data collection meetings were organized with specific public entities to gather additional baseline information and fill specific gaps. Such meetings included representatives from the health sector, municipal/regional departments (agriculture and husbandry, technical services, census), port authorities and regional-level business, tourism, and cultural organizations.¹³

Engagement during the baseline/impact assessment stage of the ESIA included:

- 11 meetings with municipal and community leaders and key representatives of the Aol, among which, 6 were in the form of focus group discussions;
- 13 meetings with community groups, including 7 meetings with associations related to livelihood activities (fishing, forestry, tourism, beekeeping, and agriculture), 4 focus group discussions with women's associations and 2 focus group discussions with business associations;
- 7 meetings with civil society organizations including 3 meetings with NGOs, 2 focus groups with labour unions, and 2 focus groups with citizen groups; and
- 4 meetings with informants in key regional public services including cultural heritage, health, education, and forestry¹⁴

In total, during the first round of engagement between 13 September and 4 October 2021, 25 engagement meetings were conducted with 66 people (including 50 men and 16 women) from 11 villages located within the Aol as well as from regional capitals Thessaloniki and Polygyros. The second engagement round included 10 engagement meetings conducted between 18 and 23 October 2021 with 26 people among which 16 were men and 10 were women from 7 villages

¹³ Such meetings will mostly take place during the 2nd consultation round.

¹⁴ To be completed with attendance to 2nd round of consultation meetings, including engagement and data collection meetings.

located within the Aol. In total, 92 people were met through the first and second consultation rounds, including 66 men and 26 women.

In all cases, meetings were held in Greek, as the preferred language of stakeholders. Typically, Hellas Gold representatives began with a presentation about the Project and proposed development plans. Then, stakeholders provided feedback and voiced concerns. Discussions followed a semi-structured format involving tailored conversation guides, with facilitation by the interviewer to follow topics considered most relevant for follow-up. At the end, stakeholders had another opportunity to ask questions and provide feedback.

Data collection interviews followed a more formalized questionnaire structure, allowing for focused collection of qualitative and quantitative information.¹⁵

A summary of stakeholder feedback is provided in Table 6.2-1.

Table 6.2-1: Summary of Stakeholder Feedback

General Engagement
<ul style="list-style-type: none"> • Nearly all stakeholders were willing to participate in meetings, regardless of their position toward the Project. • Nearly all stakeholders engaged expressed appreciation for updated, clear, and accessible information about the Project, specifically updated information about Skouries, use of best technology, application of international standards, water use and impacts, and environmental monitoring and management. • A majority of stakeholders requested increased public engagement in the form of regular public consultations, including opportunities to address questions and misconceptions, and to build a relationship of trust. Stakeholders highlighted that efficient communication and clear messaging would be required around employment commitments, Project mitigation measures and the new Investment Agreement. Women also stressed that Hellas Gold should create more effective communication channels, for example through regular meetings with all local associations or site tours to reassure people around perceived negative Project impacts. • At the same time, stakeholders expressed a degree of mistrust about the 'nice words' they hear about the Project, and do not want more of this. To build trust, some stakeholders have recommended that information should be shared in a balanced and transparent manner, not trying to convince people. • Stakeholders indicated that it is helpful when Hellas Gold acknowledges past mistakes.
Environmental Issues
<ul style="list-style-type: none"> • Stakeholders expressed a concern about impacts of underground drilling on buildings and structures. An ongoing study is looking at this in detail, and stakeholders want to understand the results of this assessment. • Skouries (in particular) is located above the municipal water reservoir, which provides water to the entire region. Different stakeholders cited impacts associated with mountain water runoff being potentially contaminated by the mine (particularly during flooding) as a concern. • Stakeholders also expressed a concern about underground blasting with regard to potential impacts on underground water reserves. • Multiple communities raised concerns over water use and potential contamination in the case of an accident. Potential impacts in the event of an accident need to be clearly understood and communicated. Particularly, women in Ierissos highlighted that the management of water quality and quantity was their main concern, and the protection of water resources should be an utmost priority. • Stakeholders cited potential harm (or extinction) to bee populations resulting from contamination or deterioration of vegetation, as well as effects of blasting. • In Stratoni, several stakeholder groups stressed the importance of investing in the restoration of the Stratoni beach. Reportedly, current beach conditions are limiting the expansion of tourism in the community. • Other environmental concerns include atmospheric pollution, seawater contamination and impact on fishing activities, release of heavy metals in the environment, protection of Skouries forest area, health consequences to the local community, and subsoil pollution causing agriculture deterioration.

¹⁵ Further reporting on data collection meetings to come in forthcoming ESIA version.

Social Issues
<ul style="list-style-type: none"> • Stakeholders cited the possibility of increased social conflicts as one of the main social impacts of mining operations, creating discord among those opposed to the mines and those who work for or support the mines. This has been especially challenging in past years, affecting cohesion within the overall region, in small communities, and even within families. • Historical conflicts over mining operations continue to cause residual tensions/mistrust; concerns have been expressed about potential resurgence of conflict associated with the Investment Agreement. • Stakeholders hope that the region can capitalize on its cultural, historical, archaeological and natural potential and fully develop as a tourism destination. Some stakeholders believe that the development of tourism/cultural enhancement in parallel with mining is possible but it requires joint effort, stringent environmental commitment and time. Some stakeholders fear that visual disturbance caused by mining operations as well as perceptions of social conflict and environmental contamination associated with mining in the region have a negative impact on tourism, preventing people from visiting the area. • Issues related to employment practices include suspicion that Hellas Gold uses employment as a way to gain support from among opposition groups, as well as allegations that Hellas Gold prefers to hire experience workers from other regions, rather than hiring and training inexperienced local workers. • Some stakeholders express lack of trust in Hellas Gold and political support for the Project, caused by perceived non-transparency in the process for the Investment Agreement. Such suspicions have been enhanced by conviction of Hellas Gold executives for past environmental infringement. • Perceptions that corporate social responsibility investment is not fairly, transparently or effectively allocated throughout area, focussing more on building support for the Project rather than creating equitable and lasting community benefits. At the same time, there is concern that communities are gradually becoming overly dependent on donations from Hellas Gold. • Several stakeholders cited impacts associated with Project transportation. Over the lifespan of the Project, trucks will have a negative impact on road infrastructure. Trucking also has an economic effect, interfering with touristic traffic and other regional transport needs. • Stakeholder express hope and expectation that the Project can bring new job opportunities at the local level and economic growth in the area. There were claims that many people from the community are employed by contractors rather than directly by the Project, which prevents them from having secure employment. • Business owners requested that Hellas Gold clearly communicate their procurement process to local contractors. Notably, measures to favour local preference in the allocation of contracts could be discussed with local stakeholders.
Labour Relations
<ul style="list-style-type: none"> • The health and safety of workers has significantly improved since the 1980s. • According to labour unions, Hellas Gold could be more proactive in preventing accidents and creating a safe workplace. • High levels of involuntary turnover were cited by the labour union as a source of distrust.

CSR = Corporate Social Responsibility

^a Based on information provided by Hellas Gold (personal communication from Eldorado Gold to ERM on 21 January 2022), out of 35 terminations registered in Hellas Gold workforce in 2021, only 4 were involuntary terminations.

Engagement Related to Land Acquisition

Hellas Gold reached out to all current landowners with parcels slated to be acquired by the Project. This involved communications via multiple channels (email, phone, social media) over a period of several weeks, with multiple attempts made per week to reach each landowner. The goal of these engagement efforts with landowners was to:

- Disseminate information about the Project.
- Disclose information related to the land acquisition process, including the possibility of expropriation.
- Provide details about the 'enhanced compensation package' including how it was calculated.
- Assess any potential specific economic or recreational use of the lands being acquired.
- Collect socioeconomic baseline data on the affected household.

Hellas Gold also engaged with local users of land under the expropriation order to understand communal land use in the affected area(s).

For past land acquisition activities, Hellas Gold undertook a campaign to contact all landowners who had parcels acquired by the Project after 2012. In some cases, where the original landowner had passed away, Hellas Gold reached out to the descendants of the original landowners. The goal of these engagement efforts with landowners was to confirm whether livelihoods and living standards were affected by the land acquisition, and whether these livelihoods and living standards had been restored.

6.2.2 Review of Key Considerations for Future Engagement Activities

Lessons learned from engagement activities include the following:

- Most stakeholders have been eager to meet with Hellas Gold and have an open dialogue around past grievances and current concerns.
- There is a lack of information around the Project, including misinformation and persistent confusion between the old and new Investment Agreements. Many stakeholders have requested increased communication and sharing of Project written material and visual support.
- Trust needs to be restored through sustained dialogue and community-based structures such as community committees.
- Transparency has been requested in the allocation of Project funds to community organizations and local institutions.
- Distinction should be made between public relation information and relevant Project information; the Project information will be clear and let stakeholders understand opportunities and management measures that affect them.

6.2.3 Planned Engagement during the ESIA Disclosure Process

Per EBRD PR 10, disclosure should pursue the following objectives:

- Communicate the purpose, scale, and nature of Project activities.
- Provide a platform to exchange information about the risks and potential impacts of the Project with stakeholders, as well as proposed mitigation.
- Be accessible and culturally appropriate.
- Meet the specific needs of affected groups, including vulnerable groups and women.
- Summarize the content of disclosure meetings and report on outcomes.

During the 9-week (60 days) disclosure phase, the draft ESIA and regulatory EIA will be made available to all stakeholders in a variety of formats, including online posting and hard copies provided in the Municipality of Aristotelis and Project Information Centre in Neochori. Alongside the

full ESIA and regulatory EIA, a Non-technical Summary (NTS) of the Project will be developed and published to provide accessible, summarised information about the Project, anticipated impacts and proposed mitigation measures. Key E&S risks will be highlighted for clarity of communication and informed stakeholder participation in the disclosure process. All materials will be provided in Greek. In total, the following documents will be provided for the stakeholder review:

- The ESIA studies and the regulatory EIA report
- Brochures with main questions about the Project
- The NTS
- Environmental and Social Management Plans, including:
 - Air Emissions Management Framework
 - Biodiversity Management Plan
 - Biodiversity Offset Strategy
 - Community Development Management Framework
 - Community Health and Safety Management Framework
 - Conceptual Mine Closure Framework
 - Contractor Management Framework
 - Cultural Heritage Management Framework
 - Emergency Response Plan – This plan will be partially disclosed; some sections will be kept confidential for security purposes and to maintain confidentiality of operations.
 - Environment and Social Management System (ESMS) Framework
 - Hazardous Materials Management Standard Operating Procedures
 - Influx Management Framework
 - Labour Management Framework
 - Land Acquisition Plan
 - Extractive Waste Management Framework
 - Noise and Vibration Management Framework
 - Non-Mineral Waste Management Framework
 - Security Management Framework
 - Stakeholder Engagement Plan (including Grievance Management Framework) – This document is the SEP.
 - Traffic and Transport Management Framework
 - Water Resources Management Framework

Consultation on the draft ESIA will be facilitated with stakeholders as it was during the ESIA social baseline, including key informant interviews, in-person focus groups. In addition, physical and virtual open house events will be hosted to provide the general public with information about the Project and an opportunity to ask questions and provide feedback. During these discussions, information about the Project will be provided, along with the draft results of the impact assessment and proposed management planning process.

Any in person engagement needs to take account of health and safety precautions, particularly in the context of the ongoing COVID-19 pandemic. In line with EBRD's Briefing Note (EBRD 2020), "Projects at a stage of active engagement with stakeholders therefore need to develop alternate plans, taking account of mandatory, national Covid-19 restrictions and social distancing."

Throughout the disclosure phase, due to COVID-19 measures, stakeholders will be provided with both remote consultation and facilitated in-person events, complying with social distancing rules. Planned activities will allow stakeholders to provide feedback to the ESIA and the Project, including questions, concerns, complaints, and proposed amendments or suggestions. COVID-19 health protocols will be followed during all in-person disclosure engagements (such as meetings, focus groups, and physical open houses). The COVID-19 health protocol is available in Annex II.

The approach to ESIA Disclosure is presented will include the following engagement activities:

- In-person meetings will be organized with the stakeholders engaged in September and October 2021, including vulnerable groups and directly affected communities. Additionally, one focus group with approximately 10–12 international, national, and local civil society organizations (CSOs) and NGOs will be conducted. These CSOs and NGOs have already been identified; examples include Greenpeace and WWF at an international level; Anima, Hellenic Association for Nature Protection, Hellenic Ornithological Association at a national level; and Friends of Environment Ierissos Association, Active Citizens of Olympiada, Business and Industry Association of Ierissos 'Profitis Elias' at a local level. Meetings will be used to communicate how feedback provided has been used in the ESIA studies and findings, ensure that they are comfortable with how the information they provided was interpreted, communicate the results of the ESIA studies and proposed mitigation measures, and address questions. These meetings will also be used to explain the process for ongoing participation through the disclosure phase and beyond.
- Physical open house events will be held in Stratoní, Olympiada, Stratoníki/Stageira, and Paleochóri. Each open house event will have a duration of approximately 10 hours, broken into ~1-hour time slots. Timing for these events will be defined so as to maximise participation; if demand is high, additional sessions will be scheduled. Stakeholders will be provided with communication material about the Project, the EIA and the ESIA and will have the opportunity to ask questions to Hellas Gold representatives and EIA/ESIA consultants. There will also be opportunities to record and submit feedback. Information about open houses will be provided to communities via email to stakeholders, social media posts, and on the Hellas Gold website.
- In parallel, information about the Project and the EIA/ESIA will be hosted online via the following website: <https://www.hellas-gold.com/metalleia-kassandras/kentriki/>. This site will provide information about the Project, the EIA and ESIA studies, and planned mitigation measures.

Stakeholders will be able to submit feedback and questions using online forms. Information through the virtual open house will be in Greek and accessible to all interested parties.

- Printed reference copies of the ESIA (and regulatory EIA) studies will be available at the Municipality of Aristotelis office (located in Ierissos), Olympiada community office, and the Project Information Centre in Neochori. Additionally, printed copies of the information brochure, Stakeholder Engagement Plan, and Non-Technical Summary are available at the following locations:
 - Eight local community offices (Stratoni, Stratoniki/Stageira, Neochori, Paleochori, Arnaia, Megali Panagia, Olympiada, and Varvara).
 - Municipality of Aristotelis office in Ierissos and Volvi Town Hall at Stavros.
 - Project Information Centre in Neochori village, National Road Thessaloniki-Ierissou, 63074.
- Electronic copies of the full EIA and supplementary ESIA studies may be reviewed and downloaded from the following sites:
 - Hellas Gold website: <https://www.hellas-gold.com/>
 - Eldorado website: <https://www.eldoradogold.com/>
 - EBRD website: <http://www.ebrd.com/esia.html>

Dissemination will also occur internally among the Hellas Gold workforce, in recognition of the fact that internal stakeholders are also external stakeholders (i.e., community members). Internal dissemination will involve existing mechanisms such as company e-mail, Hellas Gold social media, and internal announcements. The above process will meet both EBRD requirements, as detailed in Chapter 3, Legislative Framework, above. The ESIA information and disclosure process will drive the overall engagement process based on national and EBRD requirements.

Feedback related to the ESIA will be considered and addressed, as appropriate, in the final ESIA. Table 6.2-2 summarizes the specific feedback reception mechanism during the ESIA Disclosure. This process is closely related to Hellas Gold Grievance Mechanism Framework (GMF) further described in Chapter 7, Grievance Mechanism.

Table 6.2-2: Feedback Collection Mechanism during ESIA Disclosure

Feedback/Grievance Collection Tools	Details
Mail – post	Postal service/fax to the company standard address and fax number (Attn.: CSR Dpt.), as follows: <i>Υπόψη τμήματος Εταιρικής Κοινωνικής Ευθύνης. Ελληνικός Χρυσός, Στρατώνι, Χαλκιδική 63082, Ελλάδα Fax no.: +30 2376021081</i>
Email	The designated e-mail address created to officially receive grievances from all stakeholders: GR-grievances@eldoradogold.com
Call centre	The company call centre (free of charge landline) that is operating on a daily basis, Monday through Friday 08:00–13:00 and 18:00–21:00 Tel.: +30 2367025087
Grievance boxes	Four grievance/feedback boxes located at all 4 subproject sites entrances: Skouries, Stratoni, Olympias, Madem Lakkos. One grievance box located at the Project Information Centre in Neochori, 63074.

Feedback/Grievance Collection Tools	Details
Online feedback form on the website	Stakeholders can complete the online feedback form and submit it to the company: https://www.hellas-gold.com/grievance/ (a QR code will be created to facilitate access). Website: https://www.hellas-gold.com/metalleia-kassandras/kentriki/ This also provides with the option to submit an anonymous concern, grievance, or query. It is currently under expansion to function as a Virtual Open House that will serve the purpose of the ESIA disclosure process.

ESIA = Environmental and Social Impact Assessment

The Hellas Gold team and respective consultants participating in the ESIA disclosure consultations will be responsible for note-keeping throughout the process, including questions, feedback, and grievances related to the ESIA; these will be collated into a database for documentation and review.

Once feedback has been received over the 60-day disclosure period, it is organized by topic, considered, and addressed. This is done to streamline the response process, as well as maintain anonymity of submissions. Next steps include:

- Preparation and distribution of a summary report on disclosure feedback and how submissions have been considered and addressed.
- Where appropriate, stakeholder questions may be addressed individually.

The disclosure summary report, once completed, will be appended to this SEP.

6.2.4 Regulatory EIA Disclosure Process

In practice, both the regulatory EIA public hearing and ESIA disclosure stages are at least 60 days long and provide an opportunity for stakeholders to review and provide feedback on the Project, impact assessment, and proposed management measures.

As presented in Section 3.1, National Requirements, the regulatory EIA disclosure process starts after the check of completeness of the submitted regulatory EIA by the competent authority. At this stage, three consultation mechanism take place in parallel:

- The regulatory EIA is transferred to central and regional authorities, as well as the Regional Council for review and formal response, which is due within 30 days.
- The Regional Council and municipalities hold open meetings¹⁶ during which the Project Proponent presents the Project, and the responsible region expert presents the scientific opinion of the authority. Citizens can participate in these meetings; however, there is no formal feedback mechanism. The stakeholders have the option of either sending their opinions in writing or asking to present them in the public hearing meeting.
- The regulatory EIA is disclosed by being uploaded in the Electronic Environmental Registry, which is an online platform where stakeholders can submit comments to the respective regulatory EIA and the Project. The public consultation will last at least 30 days and is planned for later in 2022.

¹⁶ These can be seen as 'public hearings' but not formally called as such in Greek Legislation.

Feedback related to the regulatory EIA will be submitted and considered through the appropriate regulatory process.

6.3 Post-EIA/ESIA Stakeholder Engagement

Engagement is an ongoing process of sharing information, understanding stakeholder issues, and responding to questions and concerns. After the ESIA/EIA Phase, this SEP will guide stakeholder engagement through the construction, operation and closure phases of the Project. Following disclosure of the ESIA, stakeholder engagement will continue to be carried out by Hellas Gold for the Cassandra Project in line with the SEP, which will be updated at least biannually (every 6 months) through construction and annually 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 remains 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 accessibility and participation requirements of all stakeholders.

Hellas Gold will develop and implement the following measures to support ongoing engagement with affected communities and interested stakeholders:

- Community Liaison Office (Project Information Centre) – This has already been set up in Neochori 63074 in March 2022 (see Figure 6.3-1 below);
- Information provided through traditional media (e.g., print, radio), social media (e.g., Facebook, Twitter), and the permanent Project Information Centre; Meetings with stakeholder groups (including key informants, women, and vulnerable groups) on a regular basis, as set out in topic-specific management plans and including annual stakeholder perception review;
- CIC and other subcommittees to address key specific topics, if necessary. Women's participation will be ensured in the CIC and any subcommittees (see Table 6.4-1);
- A web-based Project interactive platform that allows the public to view interactive maps and updates on the Project; and
- Grievance Mechanism (see Chapter 7, Grievance Mechanism).



Figure 6.3-1: Community Liaison Officers in the Project Information Centre of Neochori

6.4 Stakeholder Engagement Approach

6.4.1 Engagement Strategies

For the purposes of information disclosure, different communication and engagement strategies will be considered, based on the needs of stakeholders. These are presented in Table 6.4-1 and will be discussed and confirmed at the outset of the implementation of the SEP and throughout Project development. Specific communication and engagement mechanisms will target particular stakeholder groups, based on the best strategies to reach such groups and with the overall objective to build trust and collaboration with key stakeholders (also see Note below).

Table 6.4-1: Engagement Methodology and Approach

Tactic	Description	Target	Frequency post EIA/ESIA	Supporting communication Materials
External Stakeholders				
Project Information Centre	Project Information Centre in Neochori will allow residents to come to ask questions, submit grievances, and access other information, such as applications for posted positions or supplier qualifications.	<ul style="list-style-type: none"> All stakeholders of the Social Aol 	Ongoing	Information boards; large scale maps; job board; grievance box; hand-out material for potential workers and suppliers
CIC	<p>A CIC of invited stakeholders will be facilitated and supported by the Project with involvement from high-priority stakeholders with relevant technical expertise, as well as community leaders or representatives, business and development groups, and other key stakeholders.</p> <p>The CIC is envisaged to have approximately 15 members that will be chosen to ensure gender, economic, and geographic representation of the Social Aol communities. Members of the CIC will be nominated by Hellas Gold based on clearly defined criteria, with input from stakeholders in the Social Aol. CIC members' votes will have equal weight amongst each other. Additionally, CIC members will have options to vote anonymously, as necessary in order to provide a safe space for dissent and opposing viewpoints. Facilitation of CIC meetings will be carried out in a way to make sure all members have the possibility to voice their opinions.</p> <p>Terms of reference to define the role and responsibilities of the CIC and how it will operate will be developed and negotiated with the CIC members. In the initial period of its existence, the CIC is envisaged to meet quarterly. Frequency of meetings can be amended, as needed.</p> <p>This group will provide the Project team with community feedback and perspectives; identify challenges and opportunities; and provide a testing ground for messaging, outreach, and communications. The CIC will also be involved in monitoring the implementation of E&S mitigation measures in the long term. Additionally, the CIC will be involved in management of Tier 2 grievances and overall monitoring of grievance management.</p> <p>As a complement, subcommittees may also be established for specific topics such as environmental</p>	<ul style="list-style-type: none"> Stakeholders with key technical expertise Local communities in the Social Aol and key stakeholder categories 	Quarterly meetings, or as required	Not applicable

Tactic	Description	Target	Frequency post EIA/ESIA	Supporting communication Materials
	protection and socioeconomic benefits. Upon construction/operation, such groups could be maintained to fill a monitoring purpose. Women's participation will be ensured.			
Open Houses/Virtual 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. In the context of the COVID-19 pandemic, virtual open houses will provide an alternative to disseminate Project information to a large audience.	<ul style="list-style-type: none"> All stakeholders Communities in the Social Aol 	One-off event, at key moments of the ESIA development process	Posters and brochures presenting Project information: NTS, ESIA, management plans
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	Not applicable
In-person engagement	One-on-one meetings, group meetings, and presentations to groups with the Project, including: <ul style="list-style-type: none"> Focus group discussions, with specific sessions for vulnerable or marginalized groups when required and appropriate. Targeted key stakeholder interviews to discuss specific, technical and/or sensitive issues. These meetings will be consultative (listen and learn) sessions to identify interests, concerns and recommendations. After initial meetings with each group, the Project will follow up with each group at key Project milestones. In addition, notifications and update/follow-up mailings will be shared at regular intervals.	<ul style="list-style-type: none"> Stakeholders who are potentially affected by the Project or who represent key stakeholder interests 	Key EIA/ESIA milestones, notably Stage 1 & 2 consultation, ongoing through Project construction, operation, and closure	Hand-out material such as brochure describing the current status of the Project
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. Materials will be in Greek only – this is the only language used in the area. Project information material will be available in printed form and online.	<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 NTS Printouts and newsletters updating on the current status Project implementation
Local Presence	Local Project presence will be enhanced, including a Project Information Centre hosting notice boards, a comment box, and participation at local events (notably business and procurement events	<ul style="list-style-type: none"> Stakeholders in Aol communities 	Ongoing	Not applicable

Tactic	Description	Target	Frequency post EIA/ESIA	Supporting communication Materials
	and community events)			
Community Investments	The Project will develop a strategic CSR/Community Investment Plan, which aligns with community needs and priorities, as well as Project objectives. It will be vital for the Project to obtain stakeholder feedback to ensure that investment initiatives are a thoughtful, coordinated and co-owned between the Project and the community.	<ul style="list-style-type: none"> Stakeholders who are potentially affected by the Project or who represent key stakeholder interests 	Ongoing	Report on community investment and CSR in Hellas Gold Sustainability/ESG Report Detailed CSR fact sheet available for download on Project 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 	Ongoing	Not applicable
Traditional Media Relations & Advertising	The Project will establish a media relations strategy for both traditional media (e.g., print, radio) and social media (e.g., Facebook, Twitter) that outlines a recommended media approach, protocols and systems to establish how the Project interacts with media. Notably, Hellas Gold social media will be used as a platform for EIA/ESIA disclosure and further communications.	<ul style="list-style-type: none"> All stakeholders 	Ongoing	Press release and media updates on the Project implementation
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. The website will notably be a platform for EIA/ESIA disclosure, (i.e., the virtual open house).	<ul style="list-style-type: none"> All stakeholders 	Ongoing	Interactive website
Project Updates/ Newsletter	Internal company newsletters will be developed to provide updates on the Project and disseminate key information.	<ul style="list-style-type: none"> Internal stakeholders 	Monthly	Newsletter
Grievance Mechanism	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 stakeholders through established Project communication means.	<ul style="list-style-type: none"> CIC All stakeholders 	Quarterly	Quarterly report
Augmented Key Messages and FAQs	Hellas Gold is currently in the process of revising its key messages and FAQs. The Project will continue to update and elaborate these key messages and FAQs as the details of the Project development, and as the Project engages with and learns	<ul style="list-style-type: none"> All stakeholders 	Key milestones such as the launch of the consultation process; Quarterly	Key Messages and FAQs

Tactic	Description	Target	Frequency post EIA/ESIA	Supporting communication Materials
	from stakeholders.			
Internal Stakeholders				
In-person engagement	Meetings with Unions representatives	<ul style="list-style-type: none"> Worker unions representatives 	As needed	Not applicable
Existing internal communications	Internal communication mechanisms include email announcements and management briefings. These will be used to communicate directly with employees around EIA/ESIA disclosure, HR, corporate policies, Project management and updates	<ul style="list-style-type: none"> All workers 	Quarterly or as required	Email announcements or other employee application
Grievance Mechanism	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 stakeholders through established Project communication means.	<ul style="list-style-type: none"> Internal stakeholders 	Quarterly	Quarterly report

CIC = Community of Interest Committee; COVID-19 = coronavirus disease 2019; CSR = Corporate Social Responsibility; E&S = Environmental and Social; EIA = Environmental Impact Assessment; ESG = Environmental and Social Governance; ESIA = Environmental and Social Impact Assessment; FAQ = Frequently Asked Questions; HR = human resources; NTS = Non-technical Summary; Social AoI = Social Area of Influence

Such stakeholder engagement approaches will be carefully planned to be in line with the level of Project activity and stakeholder relations, considering social tensions and engagement priorities. Engagement mechanisms will also be 'culturally appropriate,' including local languages and communication processes towards the different stakeholder groups. Best strategies to reach specific stakeholder representatives (e.g., the President of the community, women's groups) will also be carefully designed through the support of Hellas Gold's local community relations team prior to the conduct of such activities.

Where appropriate, progress on key issues will be reported back to stakeholders to demonstrate how their input has been incorporated into Project procedures.

Note: some of the above-proposed engagement mechanisms may need to be revised to reflect restrictions posed by the COVID-19 pandemic, if any, at the time of engagement.

6.4.2 Specific Strategies for Vulnerable Groups and Women

Dedicated approaches and increased resources will be used for engagement with vulnerable groups so that these groups have the opportunity to fully understand the issues that are potentially affecting them and are provided with specific opportunities to ask questions and express concerns.

The tactics listed in Table 6.4-1 will be validated to confirm that they are accessible and appropriate for vulnerable groups (as defined in Section 4.2.3, Vulnerable Groups). Special attention will be paid to in-person engagement and local participation in field studies/research. Hellas Gold will ensure the priorities listed in Table 6.4-2 are embedded in engagement activities.

Table 6.4-2: Engagement Approach for Vulnerable Groups and Women

Priorities	Vulnerable Group Involved	Commitments to be Implemented by the Project
Identify and engage with vulnerable households in each village during ESIA disclosure	All vulnerable groups	Hellas Gold will engage specifically and appropriately with entities (such as local NGOs or community-based organizations) that represent the interests of vulnerable groups. Engagement will include advance dissemination of Project information to vulnerable groups (via appropriate representative entities), discussion about appropriate forms of engagement to meet the needs of vulnerable groups, and follow up to ensure vulnerable groups have had the opportunity to share feedback in an appropriate manner
Specific engagement activities with women and vulnerable groups	Women and vulnerable groups	Hellas Gold will organise female-only meetings if this would be agreed as an efficient tool during preliminary meetings with entities (such as community-based organizations or local NGOs) that represent the interests of women and vulnerable groups. Meetings will be designed to be appropriate to the needs and preferences of these stakeholder groups: this includes format of the meetings, timing and locations, and facilitation (e.g., women-led and facilitated). Transportation and free childcare will be provided for women, when required, to facilitate their participation in meetings. Hellas Gold will ensure involvement of a female engagement facilitator in these meetings.
Presence of women in CIC.	Women	Hellas Gold will have gender representation in the CIC.
Engagement with pensioners considers COVID-19 requirements and pensioners' concerns about in-person meetings.	Pensioners	Offering in-person discussions with the elderly directly in their home (including following relevant COVID-19 requirements) if they cannot attend the public meetings and would like to meet in person. Engagement with pensioners will consider COVID-19 requirements and pensioners' concerns about in-person meetings and the Project will therefore provide options for virtual engagement.

CIC = Community of Interest Committee; COVID-19 = coronavirus disease 2019; ESIA = Environmental and Social Impact Assessment; NGO = non-governmental organization

Internally, Hellas Gold will take special care to ensure that women workers are provided with specific opportunities to voice their concerns. Awareness will be raised internally about the importance of integrating women or marginalized employees. Training will also be organized around Hellas Gold's corporate policies – notably the Human Rights Policy (see Annex VI) and Code of Business Conduct and Ethics, as well as commitments referring to Gender-based Violence and Harassment (GBVH) – as a way to communicate zero tolerance for discrimination and harassment.

6.4.3 Management of Potential Retaliation Risks

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 (see Annex VI). 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 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 through trade union representatives 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.
- Hellas Gold will comply with the requirements of the General Data Protection Regulation (GDPR) (EU) 2016/679. During the disclosure period, Hellas Gold's external consultant will involve GDPR specialists to ensure that the privacy of participants (including human rights defenders, CSOs, and others) is protected during the engagement process, including when using online tools. One way to ensure this is to provide the possibility of submitting feedback through online untraceable forms.
- Hellas Gold security team will be on site to provide risk assessment and de-escalation, as needed; in the event that demonstrations arise that present a risk to personal or property safety, police forces will be engaged per standard operating procedures to respond appropriately;
- Hellas Gold will not only hold meetings with supporters but will also engage opposition groups and organise separate meetings with them if they feel more comfortable.
- Dedicated focus groups with vulnerable groups/women engaged in September and October 2021 will also be organised. Stakeholder information will be kept confidential, including the names of participants and identifiable feedback.
- Anonymous feedback will be possible through comment boxes and online feedback forms, as presented in Table 6.2-2, Feedback Collection Mechanism, during ESIA Disclosure and Chapter 7, Grievance Mechanism.
- Hellas Gold will establish local collaborative structures such as CIC to actively engage them in decision-making processes, in complaints handling, etc. People can raise concerns with these local structures if they do not feel comfortable raising their concerns directly to the Project.
- A Community Health and Safety Management Plan and a Security Management Plan will be prepared in line with the Eldorado Gold Code of Ethics and Business Conduct and Human Rights Policy (see Annex VI).
- Working with previously identified systems and entities (e.g., community advisory boards, workplace committees, community relation team, grievance mechanism) Hellas Gold will

proactively monitor for any issues regarding retaliation, both actual and perceived, and will develop appropriate responses (e.g., modified management measures, adopted engagement approach, collaboration with local security officials).

- Hellas Gold will develop and implement a Gender Action Plan for the Project, including mitigation measures regarding GBVH¹⁷. The Grievance Management Framework will be 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).

6.4.4 Action Plan

Table A3-1 in Annex III provides a summary of the recommended action plan for engagement activities to be undertaken throughout the Project life cycle. This action plan will be adapted to specific needs arising from engagement activities, such as stakeholder requests for specific consultation activities or change/deterioration in the overall social climate.

6.5 Changes to Project Environmental and Social Risks and Impacts

This SEP is a living document that will be updated annually and as needed, with a view to reflect changes to the Project resulting in significant environmental or social risks and impacts. In particular, the stakeholder engagement program will be revised based on ongoing stakeholder relations and the need for specific engagement activities.

Changes can occur during the Project's life cycle. These can occur after the Project information disclosure, such as the ESIA and other Project documents, and during Project construction and implementation. Examples of potential changes include:

- Changes in Project scope or intended use of the EBRD finance proceeds;
- Changes in Project design, such as the Project footprint, location, routing, or production capacity; changes in raw materials, technology, or processes; changes in water use; or changes in emission controls;
- Changes in Project schedule;
- Changes in construction methodologies;
- Environmental and social monitoring impacts that are more significant than originally assessed; and
- Changes in operational methodologies such as local employment strategy, and changes in use of raw materials, technology, or to a production process.

¹⁷ GBVH is umbrella term for violence and harassment directed at persons because of their sex or gender, or affecting persons of a particular sex or gender disproportionately, and includes sexual harassment.

In case such changes occur at any stage of the Project and result in significant changes to the environmental or social risks and impacts of the Project, Hellas Gold will disclose updated information to stakeholders and undertake additional consultation prior to these changes. This will, at a minimum, target stakeholders who will be affected by the altered risks and impacts and those interested in the issues related to these risks and impacts. Hellas Gold will identify any Project approvals that could be affected and the relevant regulatory agencies that will need to be consulted. Hellas Gold will consult on both the changes to the risk and impacts and the altered/additional mitigation measures proposed. Significant changes will include those that cannot be readily mitigated with existing Project mitigation measures.

Hellas Gold will notify the EBRD where there are 'any changes to the Project's scope, design, or operation that is likely to materially change its environmental or social risks and impacts' and as agreed with the EBRD, will update the applicable Project documents that were previously disclosed. Further guidance is provided in the PR 1 Guidance Note on what may constitute a material change.

CHAPTER 7 GRIEVANCE MECHANISM

7.1 Introduction

Hellas Gold is currently implementing a formal GMF, which outlines the principles and process for grievance management, and defines the organisational structure and processes required to implement a functional, effective and culturally appropriate grievance mechanism that is responsive to stakeholder needs.

A grievance is defined as an issue, concern, comment, question, problem or claim (perceived or actual) raised by an individual or group of stakeholders ("complainants") affected by the Project activities. In the context of the proposed Project, grievances may also be related to a commitment of Hellas Gold or its subcontractors that has not been honoured.

The purpose of the GMF developed by Hellas Gold is to establish fair, accessible, effective, and timely mechanisms for stakeholder concerns, complaints and grievances to be raised and resolved without risk of discrimination or retaliation.

The GMF is designed to address grievances expressed both verbally and/or in writing, and can also be used to address grievances that are communicated indirectly (i.e., through reports from sources other than the complainant/aggrieved party). The GMF also applies to grievances that are related to both real and perceived issues and incidents. The GMF will allow submission of grievances related to GBVH in relation to both workplaces and external communities.

The GMF applies to all activities and components of the Project, including those under the responsibility of Hellas Gold, its employees, contractors and subcontractors. It is applicable to all phases of the Project, including construction and operation, and will be updated regularly to ensure it remains relevant and appropriate to the scale and phase of the Project.

Through the implementation of the GMF, Hellas Gold will be made aware of stakeholder concerns related to the Project, and respond to them in a timely manner. An effective GMF can result in the identification, mitigation and possible resolution of grievances before they escalate and potentially lead to greater harm. Therefore, Hellas Gold understands the need to develop a GMF as early as possible in the Project development process, and that the grievance mechanism will be proportionate to the risks and potential adverse impacts of the Project. The GMS will help to achieve the following objectives:

1. Receive and facilitate resolution of stakeholder concerns and grievances, especially regarding environmental and social performance.
2. Mitigate potential negative impacts related to mining activities.
3. Reduce associated conflict.
4. Sustain and improve relationships with local communities.

In parallel, Hellas Gold has developed a specific Worker Grievance Mechanism that is presented in Section 7.5, Worker Grievance Mechanism.

The GMF will also be used to guide Hellas Gold's contractors to implement, monitor and evaluate their specific best practice compliant grievance management mechanisms. Each construction contractor and their subcontractors will be required to implement their own third party and worker grievance mechanism to manage construction related grievance and complaints, in alignment with Hellas Gold's overarching GMF.

7.2 Principles

The key principles adhered to by Hellas Gold in order to deliver a successful GMF aligned with EBRD requirements include the following:

- **Appropriate to the Hellas Gold Project scope.** The GMF must be formalised in proportion to the level of potential risks and potential adverse impacts on affected communities, stakeholders and workers posed by the Hellas Gold Project;
- **Culturally appropriate** to Hellas Gold's operating site and reflecting the ways in which each community handles their concerns. The mechanism will also allow for anonymous complaints to be raised and addressed.
- **Accessible** to all workers through the Worker Grievance Mechanism (see Section 7.5, Worker Grievance Mechanism) and individual and institutional stakeholders listed in this SEP, at no cost and without retribution and retaliation. The possibility of accessing available alternative remedies recognised by the Project and national and international legal systems will be available.
- **Clearly communicated** the Hellas Gold GMF and associated grievance procedures will be communicated through appropriate and relevant channels.
- **Transparent, fair** and with clear grievance resolution accountabilities.
- **Free** from manipulation, interference, coercion, intimidation, and retaliation.
- **Confidentiality** of the complainants will be ensured.
- **Monitoring of the implementation** of the GMF and analysis of trends will be undertaken regularly.

Hellas Gold will inform the stakeholders about the GMF in the course of its engagement activities, and report regularly to the public on its implementation, protecting the privacy of affected individuals.

7.3 Eligibility

Anyone can file a grievance at any time and at no financial cost, with the ability for complainants to remain anonymous if they choose. However, grievances must meet one or more of the following criteria to be considered eligible for inclusion in the GMF:

- The grievance is made by a person (or a representative who has the consent of the person to act on their behalf) who resides in – or with a family connection to – the Project area; and/or
- The grievance identifies an impact, complaint, concern, or problem that is directly or indirectly related to one or more activities of Hellas Gold or its subcontractors, such as those related to

Project engagements, activities, impacts, responsibility, and scope. If the grievance is considered out-of-scope of the Project, Hellas Gold will respond to the complainant with an explanation and will inform the complainant who they should contact to get the issue addressed (if possible).

- Well-founded grievance is an admissible grievance that is confirmed by an initial investigation. The initial analysis will allow to identify the different level of interrelation and interaction of the grievance owner, its interests, and influence on the Project regarding the grievance.

7.4 Process for Community Grievance Mechanism

The main language used for the grievance mechanism will be Greek (according to the Project, as well as community engagement in September and October 2021, as there are no non-Greek speaking people in the Social Aol); however, to accommodate the potential for stakeholders with alternative language needs or preferences, the GMF will accommodate grievances filed in any language. Grievances and complaints can be submitted:

- in person to the Community Liaison Officers (CLO);
- in writing using the grievance form available at the Project Information Centre, and the main gates/entrances of the four mining facilities: Stratoni, Olympias, Skouries and Madem Lakkos in the Social Aol;
- online using the grievance form on the Hellas Gold grievance website: <https://www.hellas-gold.com/grievance/>;
- by mail at Υπόψη τμήματος Εταιρικής Κοινωνικής Ευθύνης, Ελληνικός Χρυσός, Στρατώνι, Χαλκιδική 63082, Ελλάδα or email at: GR-grievances@eldoradogold.com;
- by fax at +30 2376021081;
- by phone through a free company call centre that is operating on a daily basis, Monday through Friday 08:00 to 13:00 and 18:00 to 21:00 (Tel: +30 2367025087). When a complaint is received via the hotline, the Grievance Coordinator (GC) will either fill out a grievance form directly or arrange to meet with the complainant in person and complete a form at that time.

The means by which grievances are submitted will be monitored and included in quarterly reporting to the Director, Sustainability (corporate level). This will allow Hellas Gold to review the GMF and revise, as appropriate, for accessibility and appropriateness. The grievance management process will be managed by the Hellas Gold GC. Grievances are then registered on a grievance form and in the Grievance Master Register (GMR). The registration will include information regarding the type and severity of the grievance, contact details of the complainant, and responsible person/department for handling the grievance. Personal data contained in the grievance GMR will be kept only as long as it is necessary to investigate the complaint, implement a resolution, and monitor the situation at post closure stage. Personal data will then be either deleted or modified and

transferred to an archive for a reasonable period pursuant to Hellas Gold's Data Privacy Policy (HG-PRM-PO-0001)¹⁸.

Annex IV presents a copy of the grievance form and Annex V presents a screenshot of the GMR.

A separate channel will be established to consider grievances related to GBVH, either from within the extended workforce or external communities. Multiple reporting channels will be available to report GBVH grievances, with anonymity and confidentiality to be maintained. There will be an option for people to communicate grievances to someone of their preferred gender. (e.g., if a woman prefers to explain the grievance to another woman). The process to identify and respond to GBVH grievances will align with the guidance provided in *Addressing Gender-Based Violence and Harassment: Emerging Good Practice for the Private Sector* (EBRD et al. 2020), particularly with respect to Annex 7 (GBVH grievance mechanisms and investigative procedures) and will include the following steps:

- The GC will monitor the external grievance intake channels and flag GBVH grievances as they are received, assigning them to a separate workflow. Grievances identified as being potential GBVH issues will be automatically assigned high severity and follow a separate workflow and shorter response timeline.
- Two female members of the public relations team will act as GBVH Coordinators and manage the dedicated workflow for these grievances. They will receive GBVH grievances raised by external communities and related to the workplace. They will be available to discuss GBVH-related issues with stakeholders in person, if requested. When receiving a report of GBVH, the immediate priority will be to enable the reporter to access the professional support he/she wants and secure the safety of the person/persons involved. The GBVH Coordinators will work with the survivor, witnesses, and whistleblowers (where possible) to identify safety measures and prevent further harm.
- The GBVH Coordinators will follow-up all reports of GBVH; however, not all reports of GBVH will require an investigation. The decision on whether to investigate will be determined by the GBVH Coordinators, based on various factors, including the severity of the reported behaviour, its impact, and the wishes of the survivor.

All employees, contractors, and representatives will be aware of the existence of the GMF and how stakeholders can access it so that if someone with a complaint approaches them, they can direct them to the system or to a member of the community relations team. The grievance form is then submitted to the GC, who will follow the GMF process described on Figure 7.4-1.

¹⁸ Hellas Gold data privacy policy and consent texts can be found (only in Greek – new/English website currently under construction), as follows: Grievance Submission Form (<https://www.hellas-gold.com/grievance/>); Data Privacy Policy (<https://www.hellas-gold.com/legal/privacy-policy/>); and Processing Sensitive Personal Data Policy (<https://www.hellas-gold.com/legal/suppliers-applicants-notice/>)

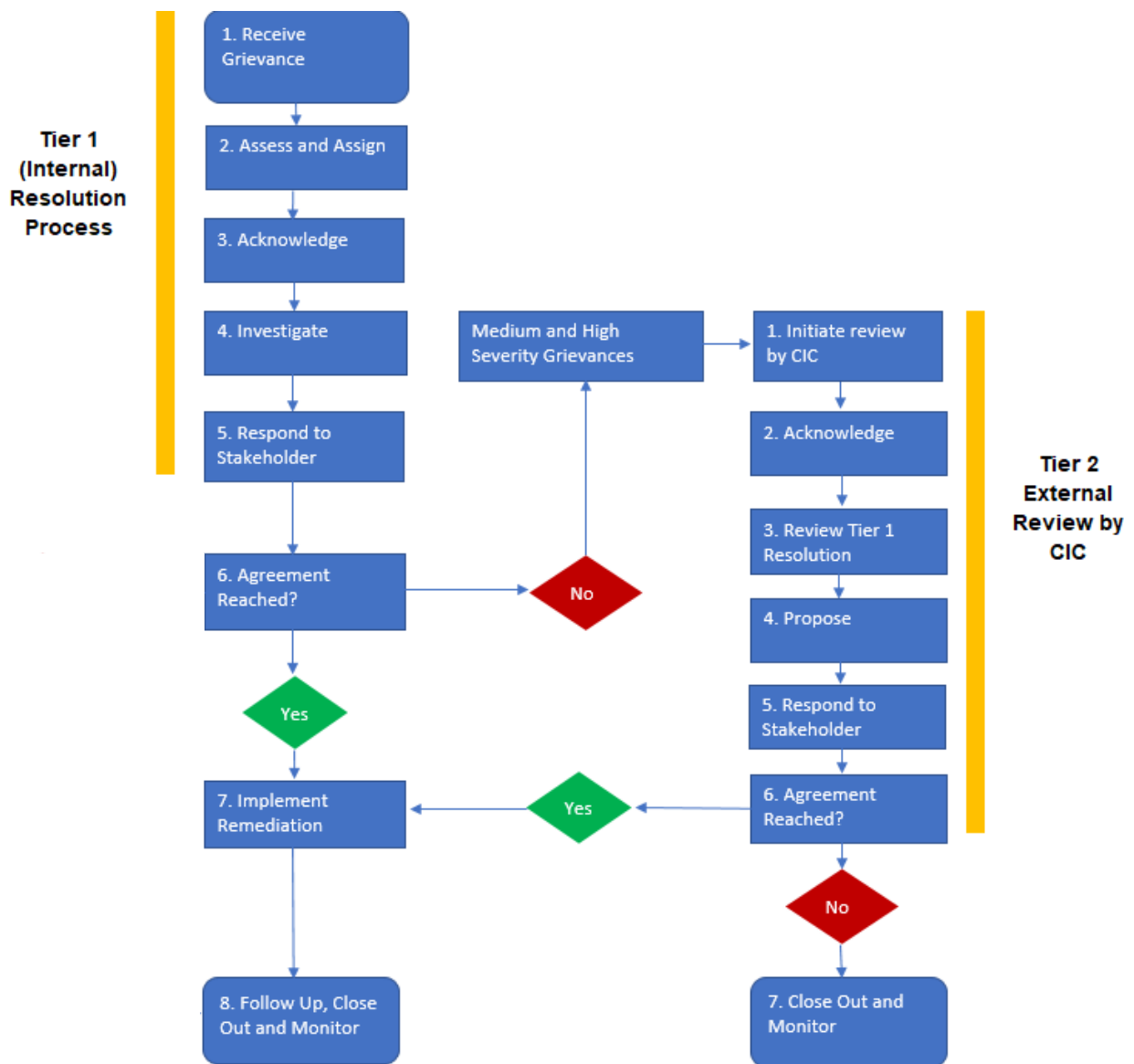


Figure 7.4-1: Overview of Hellas Gold Grievance Mechanism Process

Hellas Gold has adopted a Two-Tier grievance management approach in which Tier 1 is the Internal Resolution Process while Tier 2 involves an external review provided by CIC. More information on CIC is provided in Chapter 9, Roles and Responsibilities.

As per the Internal Resolution Process (Tier 1), grievances received are categorized in terms of their level of severity (low, medium, high). The on-site GC will be responsible for assessing the severity of a grievance and assigning the grievance accordingly based on consultation with responsible work stream managers.

Grievances are also classified by work-stream categories, which include, among others:

- **Technical and Design Assurance and Support**, for grievances that result from engineering design planning activities;

- **Construction**, including grievances related to dust, noise, vibration and any damages caused during construction;
- **Land Easement and Acquisition activities**, including grievances related to compensation, property boundaries, titling and ownerships;
- **Livelihood Restoration activities**, including grievances related to livelihood impacts and delivery of livelihood restoration programs;
- **Legal and Compliance**, including grievances with legal ramifications for Hellas Gold such as the ones related to the Code of Conduct and ethics;
- **Social Conduct in Communities**, including grievances resulting from unfavourable interactions between Hellas Gold or contractor staff and the community;
- **Community Safety and Security**, for grievances related to transport and accommodation;
- **Cultural Heritage**, including grievances associated with the protection of cultural heritage sites;
- **Health, Safety, Security & Environment (HSSE) incidents**, for example grievances related to potential injury or loss of life, which would be managed directly by Hellas Gold's on-site E&S Manager;
- **Human rights**, including grievances related to human rights issues including retaliation;
- **Environment**, for grievances related to environmental protection and biodiversity;
- **Employment**, including grievances associated with recruitment or retrenchment practices and alleged breaches in Human Rights;
- **Stakeholder Engagement**, for grievances resulting from a lack of stakeholder information or consultation; and
- **Corporate Social Responsibility**, related to grievances associated with the implementation of CSR activities.

The on-site GC initiates the grievance resolution process by assigning grievances for investigation to the relevant Hellas Gold work-stream or to a specific contractor. Acknowledgment is provided to the stakeholder/complainant through a Grievance Acknowledgement Letter and an investigation is conducted by the relevant workstream. Then, remediation measures are proposed and communicated to the stakeholder/complainant, who will have the choice to agree or disagree with the proposed measures. If agreement is reached, remediation or compensation actions are implemented. Following implementation of the defined remediation actions, a Grievance Closure Form will be completed and signed by Hellas Gold GC and the respective stakeholder filing the grievance.

Timelines for resolution of Tier 1 grievances are as follows:

- Register grievance in database: within 7 working days;
- Acknowledge grievance: within 7 working days;
- Issue grievance rejection letter (if required): within 30 calendar days;

- Issue grievance feedback explaining time required for resolution and on-going progress if not yet resolved: after 30 calendar days;
- Issue grievance feedback when mitigation established within the assigned timeframes: 30/60/90 days depending on severity levels; and
- Approve and issue compensation payments: 30 days after signing agreement.

If grievances are not resolved (for example in the case of high and medium severity grievances) or if a mutually acceptable resolution cannot be reached with the stakeholder/complainant, the External Review Process (Tier 2) is triggered.

Tier 2 involves the mobilization of an external review party, represented by the CIC, to review outcomes of Tier 1 medium or high severity grievances, where complainants are not satisfied or the matters requires additional mediation or arbitration. More information on CIC is provided in Section 6.4.1, Engagement Strategies, and Chapter 9, Roles and Responsibilities. Timelines for Tier 2 grievances management are as follows:

- Initiate external review process and obtain all required internal approvals and confirm complainant's consent on external review process: within 30 calendar days since grievance closure by Tier 1 process;
- Convene the CIC: within 30 calendar days upon obtaining consent from the complainant;
- Issue external review resolution decision: within 10 working days upon completion of CIC review; and
- Implement agreed remediation measures: dependent on the type of remediation and terms of agreement reached with the complainant.

7.5 Worker Grievance Mechanism

Hellas Gold Worker GM is a specific dispute resolution mechanism for Hellas Gold employees. The dispute resolution process is context-specific, allowing flexibility to resolve disputes quickly and effectively. The process is managed by the Hellas Gold's Human Resources (HR) Department, which is responsible for providing guidance to employees on the steps to follow in the event of employment-related disputes and grievances.

7.6 Organisation and Implementation

Hellas Gold and its contractors will manage grievances and complaints related to their specific activities.

7.6.1 Hellas Gold Grievance Management Team

The grievance management process is supported by the Hellas Gold grievance management team, as presented in Table 7.6-1. In the case of high severity or high-risk grievances, a multidisciplinary

ad-hoc Grievance Task Force (GTF) can also be established to ensure grievance resolution is allocated maximum priority and further risk is avoided. The GTF can also be mobilized to support the case of grievances filed by complainants via alternative grievance mechanisms, where Hellas Gold needs to be represented in the resolution or review process. The GTF will be led by the respective on-site Project Manager and supported by Hellas Gold Legal & Compliance Department. Potential GTF members are presented in Table 7.6-1.

Table 7.6-1: Hellas Gold Grievance Management Team

Regular Grievance Management Team	Ad-hoc Grievance Task Force
<ul style="list-style-type: none"> • CSR and Social Performance Director (Athens) • On-site Project Manager • Environment Manager • On-site E&S Manager • CSR Supervisor (Municipality of Aristotelis) • Land Management Manager • Two CLOs, permanent direct staff, one of the CLOs will also act as an on-site GC • An additional full time equivalent CLO represented by an external company providing two permanent staff, out of whom at least one woman • Two female personnel of the Public Relations team acting as GBVH Coordinators • Other functions and departments (work streams) responsible for resolution of specific types of grievances 	<ul style="list-style-type: none"> • Project Manager (as required) • Site Manager (as required) • On-site E&S Manager • Construction and Engineering Manager • CLO, including CLO who also performs as on-site GC • On-site Legal and Compliance Officer

CLO = Community Liaison Officer; CSR = Corporate Social Responsibility; E&S = Environmental and Social; GC = Grievance Coordinator; GBVH = Gender-based Violence and Harassment; GTF = Grievance Task Force

Specific roles and responsibilities associated with the GM team are further described in Chapter 9, Roles and Responsibilities (see Table 9-1).

The GC and GBVH Coordinators will be trained to recognize the characteristics of GBVH. Hellas Gold will roll out mandatory training and provide guidance for all those who might receive a report (both from external communities, as well as allegations of GBVH involving employees in its workplaces), and equip employees with guidance relevant to their role in responding to report. The GBVH Coordinators will be trained to manage GBVH grievances and determine cases when an investigation is required. Training will also ensure that they have the required skills and expertise to carry out such investigations. While developing in-house capacity, Hellas Gold may retain the option of involving an external specialised party to provide support and capacity building in relation to managing GBVH issues.

In addition to the internal Hellas Gold GM management team and multidisciplinary GTF, the CIC may be asked to review the Tier 1 process of medium or high severity grievances where complainants are not satisfied with the proposed resolution.

Hellas Gold personnel to be involved in the GMF implementation will complete appropriate training, particularly related to handling stakeholders' opinions, and applying suitable methods of providing information.

7.6.2 Contractors and Subcontractors Grievance Management

The requirements of the grievance management process will be applied to contractors as presented in the Labour Management Plan. Contractor organizations will be required to provide adequate means of receiving and addressing workforce grievances, in line with the requirements of PR 2, 2.18. In the event that contractors do not have a functioning grievance mechanism, Hellas Gold will make the Worker Grievance Mechanism available for contractors, with accountability for addressing grievances in line with the Hellas Gold GM applied to contractor organizations through contracting means. Communication around this will be managed through the Contractor Management Plan and Grievance Management Framework, including contractor roles and responsibilities with regard to GM implementation and response. Contractors will manage grievances and complaints relating to their workforce, as presented in Table 7.6-2.

Table 7.6-2: Contractor Grievance Management Structure

Contractor Organisation
<ul style="list-style-type: none"> • Project Manager • Construction Manager • E&S Manager • Social Manager • Other functions and departments (work streams) responsible for resolution of specific types of grievances.

CLO = Community Liaison Officer; Grievance Coordinator

For worker disputes involving third parties (such as the Contractors), Hellas Gold has an Industrial Relationships Function, whose responsibility is to ensure that Hellas Gold meets its obligations in relation to Contract worker employment rights, relevant workers' unions, Government employment and other relevant agencies. This Industrial Relations Function forms part of Hellas Gold HR Department and works closely with the Legal and Integrated Project Management Team.

The GMR referred under Section 7.4, Process for Community Grievance Mechanism, also supports the Contractors' third-party grievance management process. This means that each Contractor will have dedicated access to the grievance management tool to record, track, and manage its grievances. Each Contractor will have access to grievance data related to their activities only.

All grievances (both referring to worker and community) received by contractors will be logged in the Grievance Master Register, shared with Hellas Gold, and registered, including in cases when these grievances can be immediately resolved by contractors.

Contractors will be trained in and required to handle grievances in compliance with the Hellas Gold Grievance Management Framework. Relevant clauses will have an equivalent grievance management system, and dedicated functions for its implementation will be included in the contract conditions for contractors. Contractors will be required to abide by the Hellas Gold Grievance Management Framework, and by the requirements for confidentiality, data protection and management, conflicts of interest, and avoidance of retaliation. Contractors will be required to provide plans outlining internal grievance management structures, plans for staff (and subcontractor) training on the grievance mechanism.

Hellas Gold may receive complaints about the activities undertaken by contractors (and their subcontractors). Hellas Gold will be responsible for collecting such grievances and passing them on to the contractors for resolution. If Hellas Gold needs to lead the investigation of a grievance related to a contractor or subcontractor activity, then the Grievance Coordinator will be supported by the Hellas Gold representative managing the respective contractor, as well as by the Contractor's Project Manager and/or Social Manager. In case of repeated complaints in a location or on a specific matter referring to a contractor (or their subcontractor[s]), this will be escalated and the corrective action will be discussed with the senior management of the contractor.

CHAPTER 8 DOCUMENTATION, MONITORING, AND FOLLOW-UP

8.1 Documentation Tracking

All engagement activities throughout the life of the Project will be documented and filed in order to track and refer to records when required and ensure delivery of commitments made to stakeholders.

The following stakeholder engagement records and documentation will be used:

- **Meeting Template**: Records the date and time of every meeting, the attendees (disaggregated by gender), topics of discussion, and any decisions or commitments made. This information will be entered into the Stakeholder Engagement Log within 48 hours of each engagement. The meeting template including any photos and supporting annexures will be archived electronically.
- **Stakeholder Database**: Contains records of key stakeholders (both individuals and groups) and contact details including:
 - National, District and Local Authorities;
 - Local community leaders;
 - Community representatives such as farmers, women, health workers and teachers;
 - Local industry (tourism and agriculture); and
 - International national or local environmental and social NGOs.
- **Stakeholder Engagement Log**: All engagements with stakeholders will be recorded using key information from the meeting template to provide high-level tracking of engagements taken to date. Where detailed information on a specific engagement is required, the Stakeholder Engagement Log may be cross-referenced with archived meeting templates.
- Hellas Gold has been maintaining a stakeholder database and an engagement log in an Excel format over the period 2020–2021. The possibility to manage stakeholder engagement through an online platform will be discussed internally.
- **Grievance Form, Register and Close Out Form**: All grievances received will be recorded in a Grievance Form, Grievance Register and Grievance Close Out Form in order to address grievances and record whether they have been satisfactorily closed out, response times to address complaints, patterns in grievances received and potential to avoid recurrent problems and improve the Project's overall performance.

8.2 Stakeholder Engagement Plan Monitoring

The activities covered in this SEP overlap with other management plans, including:

- Community Development Management Plan
- Community Health and Safety Management Plan
- Influx Management Plan
- Labour Management Plan
- Cultural Heritage Management Plan

- Land Acquisition Plan
- Traffic and Transport Management Plan
- Biodiversity Offsets Strategy

Monitoring activities to be undertaken by Hellas Gold in the context of the SEP will include the following activities:

- Review and revise, as needed, the list of stakeholders (Section 4.2.2, Key Stakeholders) to verify that the register is accurate and up to date
- Monitor consultation activities conducted with government representatives and local communities
- Monitor the effectiveness of the engagement process in managing impacts by tracking feedback received during engagement activities
- As per referenced management plans, monitor engagement with the relevant stakeholders and feedback received from these activities, as well as the grievance mechanism;
- Monitor the number of reports of GBVH coming through company grievance mechanisms;
- Monitor the number of workers who have received GBVH-related training;
- Monitor the number of community members and workers reached through GBVH-related awareness raising;
- Review/audit the implementation of the SEP;
- Review and revise, as needed, the engagement strategies (SEP Chapter 7, Grievance Mechanism) to determine if additional activities are required; and
- Monitor security and potential human rights issues/risks including retaliation and take timely actions.

A CIC may be involved in the annual SEP review to provide community input to the list of stakeholders, as well as the relevance and frequency of the engagement activities and dissemination of information.

All engagement activities will be systematically documented by Hellas Gold in order to review records and track performance.

In the context of the GMF, key indicators that will be monitored as part of the system include the total number of grievances received and the total time taken to resolve complaints. While the time required depends on the complexity of each complaint, an assessment of the average time can be helpful in determining whether the process conforms to the timelines defined. The GC will also verify that the deadlines set for each step are met; if they are not, the team will consider and discuss with stakeholders how to adapt the process or allocated resources to ensure that all commitments are met.

Hellas Gold will measure the performance of the SEP and the GMF by documenting and tracking the indicators suggested in Table 8.2-1.

Table 8.2-1: Proposed Stakeholder Engagement Performance Indicators

Review Activities	Objectives	Indicators
Periodic review of published Project documents such as Project information materials, flyers, website information, media materials and other documents Quarterly review of consultation activities	<ul style="list-style-type: none"> Assess whether publicly available Project documents are up-to-date Assess cultural appropriateness of publicly available Project documents Assess level distribution documents to ensure they are available to communities in the Aol Assess level of engagement with stakeholders through formal and informal means (e.g., CIC, meetings with government agencies, focus group discussions, public meetings, other community engagement) Track issues raised by stakeholders Confirm the Company is responding to issues in a timely manner Verify consultation activities include awareness raising about the GMF 	<ul style="list-style-type: none"> Date of publicly available Project documents; frequency of distribution Level of understanding of documents by stakeholders Number and types of comments/feedback received by stakeholders Number and timing of responses to comments received Qualitative assessment of awareness of community stakeholders of GMF through stakeholder engagement process
Quarterly review of the GMF and grievances received	<ul style="list-style-type: none"> Assess whether the grievance mechanism is being used and by whom Understand what grievances are being submitted and whether they are correctly classified Identify trends in grievances Assess compliance with the grievance management process Confirm that grievances are being adequately addressed Identify improvements and updates to GMF 	<ul style="list-style-type: none"> Level of compliance with the grievance management process Number of grievances by level and type Trends in numbers of complaints Timeframes for resolution (and closure) by grievance level and type Number and percentage (%) of grievances closed according to level and type and number of close out forms signed by the complainants Number of satisfied responses from complainants by grievance level and type Number of repeated grievances (including from the same stakeholder) Qualitative assessment of awareness of community stakeholders of GMF through stakeholder engagement process Qualitative assessment of trust in grievance management process through stakeholder engagement.

CIC = Community of Interest Committee; GMF = Grievance Management Framework

8.3 Evaluation and Corrective Actions

The effectiveness of the engagement activities will be evaluated against the objectives defined in Section 1.2, Objectives of the SEP.

Follow-up and evaluation activities will include:

- Review of stakeholder feedback obtained through engagement activities and the grievance mechanism;
- Verification to make sure that the interests of a broad range of stakeholders are represented;
- Annual perception survey to monitor changes in public opinion of the Project; and
- Annual review/audit of the SEP implementation.

Where existing strategies and practices are not meeting the objectives of the engagement program (as defined in Section 1.2, Objectives of the SEP), corrective actions will be developed and implemented to address deficiencies and improve performance.

Amendments to engagement practices will be documented in this SEP, as required.

8.4 Reporting

All reports related to Project stakeholder engagement and grievance management are summarized in Table 8.4-1.

Table 8.4-1: Project Reporting on Stakeholder Engagement and Grievance Management

Report	Content	Responsible for the Report	Target Audience	Public, External or Internal Report
Quarterly reports	<ul style="list-style-type: none"> Status of implementation of the stakeholder engagement activities and of any new or outstanding issues. Number of grievances received, responses provided, and grievances closed out; a summary of issues raised by stakeholders and responses from the Project, including any corrective actions or mitigation measures undertaken to address issues. 	CSR and Social Performance Director	Hellas Gold senior management	Internal report
Quarterly reports	<ul style="list-style-type: none"> E&S performance, stakeholder engagement activities, resume of CSR activities (which projects selected, how they meet the eligibility criteria, and status of implementation). Summary of grievance management (number, types of grievances received, resolution status), posted at worksite and community office. 	CSR and Social Performance Director	CIC	Public report published on the website: https://www.hellasgold.com/
Annual reports	<ul style="list-style-type: none"> Results of the SEP implementation progress, any changes to the existing action plan, and key highlights and outcomes of the engagement process. CSR projects implemented, total annual spend as achieved, outcomes of the projects implemented in relation to the objectives defined. Resume of the annual perception survey. Survey results will be validated with the CIC. Annual reports will identify corrective actions to be included in the engagement action plan for the following year and further report against and provide relevant action plan for their implementation of any previous corrective actions. An analysis of the performance indicators listed in Table 8.2-1. 	CSR and Social Performance Director	Hellas Gold senior management CIC All stakeholders	Public report published on the website: https://www.hellasgold.com/

CIC = Community of Interest Committee; CSR = Community Social Responsibility; E&S = Environmental and Social; SEP = Stakeholder Management Plan

Regular meetings will be organized between Hellas Gold and key government representatives, authorities and other relevant stakeholders (to be determined) to discuss any grievances related to Project activities and to discuss mitigation measures and monitoring programs. These meetings will allow the targeted stakeholders to remain informed of issues related to the Project and address any questions, issues and grievances associated with these facilities, should the need arise. Internal reports will include a summary of these meetings and any findings pertinent to understanding social risks for the Project.

CHAPTER 9 ROLES AND RESPONSIBILITIES

Table 9-1 summarizes the key roles and responsibilities in relation with the management and implementation of the SEP and the GMF developed by Hellas Gold. Roles and responsibilities will be reviewed as the management structure is adjusted to fit Project development and related engagement needs.

Roles involving community liaison will prioritise local and female representation, to the extent possible.

Table 9-1: Key Roles and Responsibilities for SEP and Grievance Mechanism Implementation

Function	Roles and Responsibilities
Hellas Gold General Manager (Hellas Gold Headquarters)	<ul style="list-style-type: none"> • Maintain overall accountability for Project implementation including grievance work stream. • Manage relations with authorities and other major stakeholders. • Liaison with financiers.
Environmental Manager (Hellas Gold Headquarters)	<ul style="list-style-type: none"> • Support, as needed, by providing specialised responses to the grievance resolution process for potential environmental related grievances.
Director, Sustainability (corporate level)	<ul style="list-style-type: none"> • Ensure maintenance of Corporate policies and global management systems. • Communicate with potential financiers; global reputational management. • Coordinate and perform quality control to ensure both alignment on stakeholder engagement across Project teams and also that the requisite standard of engagement activity and internal requirements are met. • Support country-based staff and ensure that they have the resources required to implement the SEP. <p>Grievance related role:</p> <ul style="list-style-type: none"> • Oversight of grievance management process. • Provide support to the country-based team during external audits of the grievance management process.
CSR and Social Performance Director	<ul style="list-style-type: none"> • Manage the design and implementation of local CSR projects financed by Hellas Gold. • Ensure social performance monitoring. • Manage site and implement the full range of community engagement actions detailed within this SEP, including the implementation and follow-up of the GMF. • Coordinate local engagement team and other activities involving community relations to ensure both alignment on stakeholder engagement across Project teams and also that the requisite standard of engagement activity and internal operations are met. • Ensure messaging is consistent and clear when engaging stakeholders. • Establish and operate CIC. <p>Grievance related role:</p> <ul style="list-style-type: none"> • Review GMF and procedural documents. • Support budget and decision-making for grievance management work-stream. • Communicate the GMF process and obligations to Project personnel, contractors, and others engaged on the Project. • Regularly review the Grievance Register and ensure it is maintained and updated. • Notify Project Manager and other corporate managers of any high priority grievances. • Oversee CIC work related to grievance resolution and approve specialist involvement for E&S grievances. • Work with Project Manager to ensure expectations of communities and grievance-related activities are appropriately resourced and that grievances are assigned to staff with the necessary training and authority to investigate and resolve grievances. • Support, as needed, by providing specialised responses to the grievance resolution process for potential social related grievances. • Prepare reports that summarize stakeholder engagement activities including grievances received and resolution status in advance of each in monthly meetings, or as otherwise requested. • Monitor and report requirements to International Finance Institutions and external stakeholders.

Function	Roles and Responsibilities
HR Manager	<ul style="list-style-type: none"> • Manage and build the HR team. • Ensure compliance with HR policies and procedures. • Ensure transparent employment practices at Hellas Gold and a clear and well communicated complaint/grievance process for Hellas Gold employees. • Ensure labour standards/requirements for contractor's and subcontractor's employees, including a clear and well communicated complaint/grievance process. • Ensure effective engagement of workers and worker organisations and management of employee feedback and grievances. • Ensure monitoring and reporting of labour issues to the management.
Director, Corporate Affairs & Communications	<ul style="list-style-type: none"> • Develop and implement a communication strategy/plan for Hellas Gold and its projects. • Manage and build the communications team. • Oversee internal and external communications. • Work closely with CSR, Social Performance and Sustainability teams to prepare/validate communication materials aligned with company standards and ensure messaging, branding, reputation management, and, occasionally, government relations.
CSR Supervisor	<ul style="list-style-type: none"> • Act as Deputy of the CSR and Social Performance Director at the site level and ensure supervision and support for the grievance management process and the stakeholder engagement activities. • Supervise the CLOs.
<p>Two local based CLOs. One of the CLOs will act as an on-site CLO-GC. Both CLOs have been recruited in January 2022, and they will be based in Stratoní. Each of the CLOs will have approximately eight communities to be in charge of.</p> <p>One full-time CLO equivalent will be ensured by an external company, that will provide two people to support the process. One of these people will be a female.</p>	<ul style="list-style-type: none"> • Under the direction of the Site-level CSR and Social Performance Director, maintain a continuous presence in the Social Aol to build trust and relationships with key stakeholders and affected communities and receive and manage grievances in a timely manner (management of grievances will be performed by CLO-GC). • Ensure that affected communities are informed about the Project, its activities, and its impacts, ensuring that stakeholders' comments/questions and their concerns are considered and answered. • Organize and facilitate consultation meetings and other forms of stakeholders; engagement, awareness raising, and community development initiatives, according to Action Plan of the SEP, in compliance with SIMS and EBRD Performance Requirements. • Provide trainings to local community groups. <p>Grievance related role (for both CLOs):</p> <ul style="list-style-type: none"> • Communicate grievance management process to communities and the outcome of the grievance investigation for the communities in their area of responsibilities. • Ensure effective operation of grievance management process including registration, investigation, resolution, and monitoring of grievances. <p>Grievance related role (for CLO-GC):</p> <ul style="list-style-type: none"> • Monitor Contractor grievance management. • Conduct grievance and associated key performance indicator reporting. • Submit proposals for and request external review process by CIC. <p>Note: The specific structure of the team involved in engagement will be reviewed and additional capacity will be introduced, if necessary. This includes recruiting new members for the team or up-skilling existing members.</p>
Two GBVH Coordinators (female) under the Public Relations team	<ul style="list-style-type: none"> • Handle GBVH grievances from external communities and from internal workers.
CIC	<p>Upon implementation of this SEP, Hellas Gold will establish a CIC, in cooperation and collaboration with communities in the Aol. The CIC will be under the responsibility of the CSR and Social Performance Director (site level). Key representatives of the communities who are recognized and respected and be able to represent the community members will be included in the CIC. Suggested CIC members may include village head/figure heads or local leaders, business owners, representatives of stakeholders with nature-based livelihoods or fixed income, elderly, women, youth, and unemployed.</p> <p>Members of the CIC will be nominated by Hellas Gold based on clear criteria to be defined. The communities in the Social Aol will be consulted on assigning a representative. The CIC is envisaged to have 15 members that will be chosen to ensure gender, economic, and geographic representation of the Social Aol communities. CIC members' votes will have equal weight amongst each other. Additionally, CIC members will have options to vote anonymously, as necessary to provide a safe space for dissent and opposing viewpoints. Facilitation of CIC meetings will be carried out in a way to make sure all members have the possibility to voice their opinions. Terms of reference to define the role and responsibilities of the CIC and how it will operate will be developed and negotiated with the CIC members. In the initial period of its existence, the CIC is envisaged to meet quarterly. Frequency of meetings can be amended, as needed.</p>

Function	Roles and Responsibilities
	The specific roles/responsibilities of the CIC will include: <ul style="list-style-type: none"> • Discuss the overall Project implementation, stakeholder engagement activities, and management plans. • Receive and review regular updates throughout the year about how CSR development initiatives have been selected and what is the status of implementation. • Share local community concerns and expectations with the mine, • Oversee development, implementation, and monitoring of mitigation measures in view of local concerns and preferences. • Review and provide support to arbitrating Tier 2 grievances.
Hellas Gold Grievance Management Team (GMT)	<p>Regular GMT (see Table 7.6-1):</p> <ul style="list-style-type: none"> • Implement Tier 1 resolution process, normally comprised of on-site GC, Social Performance and Grievance Advisor, and responsible work streams. <p>Grievance Task Force (GTF) (see Table 7.6-1):</p> <ul style="list-style-type: none"> • Manage the resolution process for high severity or high-risk grievances or grievances filed by complainants via alternative grievance mechanisms where Hellas Gold needs to be represented in the resolution or review process. <p>CIC:</p> <ul style="list-style-type: none"> • Participate in the Tier 2 grievance resolution process to review outcomes of Tier 1 medium or high severity grievance process where complainants are not satisfied or question the outcomes and request additional mediation or arbitration.
Contracts/Procurement Manager	<ul style="list-style-type: none"> • Engage with local businesses/suppliers to communicate opportunities, requirements, contracting process, and enforce contracting terms and requirements.
Security Manager	<ul style="list-style-type: none"> • Manage relations with security forces and private security company and ensure human rights are protected while protecting the Project assets and employees. • Address security and human rights related concerns/complaints.

CIC = Community of Interest Committee; CLO = Community Liaison Officer; CSR = Corporate Social Responsibility; E&S = Environmental and Social; EBRD = European Bank for Reconstruction and Development; GC = Grievance Coordinator; GMF = Grievance Management Framework; GTF = Grievance Task Force HR = Human Resources; PR = Performance Requirement; SEP = Stakeholder Engagement Plan; SIMS = Sustainability Integrated Management System; Social AoI = Social Area of Influence

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ANNEX I: NGO OPEN LETTER AND HELLAS GOLD RESPONSE

NGOs Open Letter¹⁹

17 March 2021

Environmental organizations' position on the contract between the Hellenic Republic and "Hellenic Gold" company

The ratification of the public contract with the company "Hellas Gold of Mines and Gold Industry S.A." overturns the environmental acquis and conceals possible violations of EU law.

Primarily, environmental organizations emphasize the international obligation of the State to promote effective public participation, while all options remain open, in decisions which entail significant environmental impacts. The promotion in Parliament of a signed contract, without prior consultation, is incompatible with this obligation.

In any case, environmental organizations consider highlighting a number of key issues as their duty, concerning not only the environment but also the rule of law itself (in brackets, the relevant articles of the convention are mentioned). Particularly:

1. The contract that binds the company for compliance under the "applicable law" is promoted for ratification in the Parliament considering only its "essential aspects" [13.2]. The authors of the contract not only do not specify which these "essential" "aspects" are - an issue which, if a dispute arises, will be resolved by arbitration and not by the courts [31.4 (a)] - but they also guarantee, by binding the State, that the contract is in accordance with the applicable law [17.2 (b) and (c)].

In the view of the organizations signing the present position, the Parliament should seriously consider the issues of the rule of law, equality before the law and the competition law arising from the company's selective compliance with an indefinite "subset" of "applicable law"».

2. According to the Constitution, the State has an obligation to take 'special' preventive and restraining measures in order to protect the environment. Parallel and similar obligations also arise from international and EU law. Indicatively, each Member State has an obligation to impose "effective, proportionate and dissuasive" penalties for the implementation of the Impact Assessment Directive (Article 10a of Directive 2011/92/EU), to ensure compliance with Union provisions on industrial emissions (Article 79 of Directive 2010/75/EU), to establish "appropriate steps in the special protection areas" - such as the one occupied by mining concessions approved by the contract - "to prevent the deterioration of natural habitats of species" (Article 6 (2) of Directive 92/43/EEC). Ultimately, the State has an obligation to ensure the application and prevalence of the Constitution, international and EU laws over any other hierarchically subordinate provision of domestic legislation.

In contrast to the above, the contract under ratification provides that:

¹⁹ <https://www.greenpeace.org/greece/issues/perivallon/44175/topothesi-perivallontikon-organoseon-gia-ti-symvasi-tis-ellinikis-dimokratias-me-tin-etaireia-ellinikos-xrysos/>

- the State, and any other public or local authority (including local government authorities) will not "promote, exercise, assist... voluntarily" "in any jurisdiction" in raising "claims" [11.3],
- the State ensures that it omits practices or actions that "interfere" with mining activities [12.6 (a)],
- any "control or decision" of any local or state authority is "ipso jure invalid" if taken in the absence of an independent environmental auditor, and his proposed opinion [24.1. (k)].

The above points raise many questions about the applicability of the system of criminal and administrative penalties for the protection of the environment, safety, occupational hygiene and public health. They also highlight the reason why the reservation of the "applicable law", included in the contract, lacks substantive meaning. Regardless of the fact that the contract authors are not aware of the consequences on "applicable law", the law is applied through the state authorities, and not unilaterally.

1. International investment law provides that the right of States to legislate for public interest purposes - including the right to the environment - cannot be restricted by investment agreements: in fact, a similar provision exists in CETA, which has been provisionally maintained.

In contrast to the above, the contract includes a clause that generally prohibits "any regulation" (which) "imposes... a substantial burden on the Company, regardless of whether that regulation specifically targets the Company" [21.1]. There is an insufficient reservation on regulations imposed on compliance with "regulations from the European Parliament", which does not cover all EU law, and it is doubtful whether it covers the transposition of directives (the form and method of which are left on Member States, and is not "imposed" (Article 288 TFEU). In any case, environmental protection is not mentioned as the purpose of the regulations.

2. At the very least, the contract must impose a minimum of impartiality and transparency in the audit of the "revised Environmental Terms Approval Decision (AEPO)". Indeed, in Directive 2011/92, "Member States shall ensure that the competent authority or authorities carry out their duties under this Directive in an objective manner and are not in a conflict of interests" (Article 10a). Contrary to this important provision of EU law, the contract stipulates that the revised AEPO will be controlled "only" [24.1 (b)] by an "independent environmental auditor" who will be selected primarily, and in any case will be paid by the company. [24.1 (b), (h), (l)]. It is understood from the above that art. 17 and 20 Law 4014/2011 will not be implemented (as in force), as well as the current national legislation on controls, at least by environmental inspectors.
3. The contract, as submitted to Parliament, includes a map of a mining area, which includes forest concessions and parts of settlement areas (see, in particular, p. 137 ff., and Annex B). Within the mining area, and to the extent required by the mining activities, the company has priority "over any activity of any kind of third party" [12.3. (C)]. Indicatively, reforestation is mentioned, which in the opinion of the organizations creates a constitutional problem, especially for unlicensed future activities [117 par. 3 S], and suggests that it includes "any activity" of other authorities in the public interest (environmental protection, health, safety). These issues are vital, especially given the proximity to the settlement and the coastal area. In combination with previous observations, the regulatory and supervisory role of public authorities is crucially affected.

4. The intervention of the Natura 2000 area (GR1270005) in the mining concessions creates the need for a proper assessment of the contract and the investment plan. It also requires that the procedure for issuing "discretion licenses" complies with the provisions of EU law (for example, Article 6.3 of Directive 92/43/EEC, and for the metallurgical plant, Article 5 of Directive 2010/75). These provisions oblige the competent authorities not to grant a permit if the installation does not meet the requirements of the above directives. As mentioned above, the contract prevents, if not completely prohibits, the implementation of this obligation.
5. The contract provides for the submission of a new proposal for metallurgy, with a special procedure [15.2-15.3]. According to the organizations, the Parliament should investigate the reasons why the company is unable to implement the previous metallurgical proposal, which was extensively judicial and administratively investigated. In any case, the new proposal does not comply with Directive 2010/75/EU, and the provisions on the application of best available techniques, because it takes into account criteria not mentioned in the applicable law [cf. set out the criteria in Annex F]. The contract wrongly fails to mention (and neither takes into account) the European Commission Implementing Decision (EU) 2016/1032 of 13 June 2016 on determining best available techniques (BAT) conclusions under Directive 2010/75/EU, regarding non-ferrous metal industries, which is binding on EU Member States.
6. A number of issues are also raised by the provisions of the arbitration agreement [31.4]. Apparently, the arbitral tribunal may be called upon to rule on matters concerning the interpretation and application of EU and national law (and, in fact, provisions under the Constitution). The removal of these issues from the jurisdiction of the national courts is a significant setback, and we believe that it should be rejected by Parliament.

Environmental organizations believe that the contract, which is set for ratification by the Greek Parliament, constitutes a serious loss of the vital environmental protection acquis and raises serious issues for the application of EU law, without guaranteeing public interest and State control in ensuring environmental protection. As the inextricable link between human health and well-being, and a healthy natural environment has been dramatically brought to the fore by the pandemic, truly sustainable development under the principle of environmental and human health protection, must be a central concern of the State.

Environmental organizations:

- ANIMA
- Arcturus
- Hellenic Society for the Protection of Nature
- Hellenic Ornithological Society
- Society for the Protection of Prespa
- Pelagos Cetological Research Institute
- Callisto
- Ecological Recycling Society
- iSea
- Greenpeace
- WWF Greece

ANNEX II: COVID-19 HEALTH PROTOCOL

COVID-19 health protocol during consultation engagements

The following procedures will be followed to ensure sufficient protection against COVID-19 during all disclosure consultation engagements (meetings, focus groups, physical open houses):

- Participants will be requested to submit, in electronic format, their vaccination certificate, which will be scanned at the entrance of each facility where engagements will take place.
- For participants that are not vaccinated, the company will request a rapid/self-test that will have taken place at most 24 hours before the time of engagement.
- For participants that have had the disease, a respective certificate by competent authorities will have to be submitted, along with a negative rapid/self-test, as above.
- The use of suitable protective masks will be mandatory to all participants at all times throughout the consultation process.
- Antiseptic liquid will be available at all engagement sites and facilities to all participants.
- The above protocol is subject to alterations conditional on the status of the pandemic at the time of the engagement and in accordance with all measures, directives, guidelines, and restrictions imposed by authorities during that time.

Hellas Gold Open Letter²⁰

Athens, 2 April 2021

Subject: Open letter from Ellinikos Xrysos to the Environmental Organisations:

ANIMA, Arcturus, Hellenic Society for the Protection of Nature, Hellenic Ornithological Society, Prespes Conservation Society, Pelagos Institute of Cetological Research, Callisto, Ecological Recycling Society, iSea, Greenpeace, WWF Greece

Honourable ladies,

Honourable Gentlemen,

I am contacting you following your recent statement on the new Investment Agreement for the full development of the Cassandra Mines to bring to your attention the facts and benefits of the agreement, which is expected to bring the investment out of stagnation and unlock significant economic, social and environmental benefits for all parties.

The new Investment Agreement, accompanied by an upgraded and modern Investment Plan, was recently ratified by the Greek Parliament and published in the Official Gazette on 23.3.2021. It is the result of extensive negotiations with the competent authorities on the basis of serving the public interest, ensuring significant benefits for the local community of NE Halkidiki and achieving the sustainable and long-term development of Cassandra Mines with the common denominator being the minimization of the environmental footprint of our activity. To this end, we plan to apply the best available technologies through which we ensure strict compliance with international, European and national legislative requirements for the protection of the environment and the health and safety of our people.

As you will see in the accompanying material of this letter, Ellinikos Xrysos is making significant commitments and extensive investments to further reduce the impact of its project on the environment, including: the implementation of the Best Available Technology of Dry Disposal of mining residues to reduce the volume of residues, the construction of a new, integrated waste and water management system with a total investment of €130 million at Skouries, the expansion of the environmental programme and the implementation of the new, integrated waste and water management system at Skouries.

With the ratification of the new investment agreement, a new page is opened in the long history of the Cassandra Mines and the foundations are laid for the sustainable exploitation of the mineral

²⁰ Letter was provided to ERM by Hellas Gold

wealth that the land of Halkidiki hosts, creating balanced value for the local community, the economy and the environment.

The benefits and the pillars of the upgraded investment plan are summarized in the attached information material, as well as in the special microsite that you will find on our website. I hope that you will find them useful and that they will contribute to a better understanding of the parameters of the new Agreement as a whole.

In conclusion, I would like to emphasize that Ellinikos Xrysos, from the first day it has been active in Northeast Halkidiki, has been carrying out a responsible and multiply beneficial mining activity for the country, implementing investments exceeding \$1 billion, modernizing and operating the mines under the strictest environmental management and safety framework.

Continuing on this path, all of us at Ellinikos Xrysos remain committed and determined to proceed with the development of the mines with the utmost respect for the protection of the environment and full compliance with the provisions of the legislative framework.

In a climate of open and frank dialogue, we remain at your disposal for any further information you may wish to provide on the provisions of the new investment agreement for both the country and the environment.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Christos Balaskas". The signature is stylized with a large, sweeping initial 'C' and a horizontal line extending to the right.

Christos Balaskas

Vice President and General Manager Greece, Eldorado Gold Corporation

ANNEX III: ACTION PLAN
Table A3-1: Action Plan

Engagement Activity	Objective	Format of Engagement	Target Stakeholder(s)	Timing/Frequency	Responsibility & Support
EIA/ ESIA Baseline and Impact Assessment					
Consultation on scoping, SEP, and GMF	Ensure that scoping, SEP, and GMF take into account key stakeholders views and priorities	One-on-one meetings and focus groups	Key authorities and community representatives	Once (Complete)	Hellas Gold
Stage 1 ESIA Engagement	Disclose Project information and forthcoming EIA/ESIA process Gather community-level data to complete the social baseline Characterize opposition (sources, scale and position) Solicit informed feedback on the Project, potential impacts, and management measures	Key informant interviews, focus group discussions	Key authorities Other key stakeholders Affected communities (including vulnerable groups) Environmental NGOs, Project opponents	2- to 3-week period September-October 2021 (two engagement rounds) (Complete)	Hellas Gold, ENVECO, ERM
EIA/ESIA Disclosure					
Authorities Consultation	Fulfil the requirements of the Greek EIA process by obtaining feedback on the regulatory EIA	Targeted meetings	Central and Regional Authorities, plus the Regional Council	Once, following submission of the regulatory EIA to Greek authorities (2022 – timing TBD)	Hellas Gold, ENVECO
Regional Councils and Municipalities Consultation Meetings ^a	Fulfil the requirements of the Greek EIA process by obtaining feedback on the regulatory EIA	Open meetings in which citizens can participate, organized through the Regional Councils and the municipalities	Regional Councils and municipalities	Once, following submission of the regulatory EIA to the Greek authorities and finalisation of the completeness check (2022 – timing TBD)	Hellas Gold, ENVECO, Regional Councils, and municipalities

Engagement Activity	Objective	Format of Engagement	Target Stakeholder(s)	Timing/Frequency	Responsibility & Support
ESIA Disclosure (dissemination of ESIA documentation to the public)	Fulfil EBRD consultation requirement by publicly disclosing the final draft ESIA, NTS, and associated Project materials	The ESIA and NTS published in Greek and English and posted hard copies in Greek in the Municipality of Aristotelis office and at the Project Information Centre. The ESIA and related material available online through Hellas Gold website, as well as links provided through social media and email distribution lists.	Key stakeholders and affected communities in the Social Aol All interested (internal and external) stakeholders	Weeks 1-2 of ESIA Disclosure (60-day period – spring 2022)	Hellas Gold, ENVECO
Engage with stakeholders on the ESIA through In-person meetings (interviews/focus groups/open house events) and virtual open houses	Facilitate understanding about the Project and EIA/ESIA conclusions, as well as proposed mitigation measures Solicit feedback on the Project and EIA/ESIA Contribute to open and positive relationship with Project stakeholders	Disclosure and feedback through in-person meetings (focus groups, informant interviews) with stakeholders met during engagement rounds held in September and October 2021. Physical open house events held in Stratoní, Olympiada, Stratoníki/ Stageira, and Paleochori. Information about open houses provided to communities via email to stakeholders and through social media posts, as well as on the Hellas Gold website. Each open house event with a duration of approximately 10 hours, broken into ~1-hour time slots. Timing for these events defined so as to maximise participation; if demand is high, additional sessions scheduled. In parallel, virtual open houses hosted online, via the website: https://www.hellas-gold.com/met-alleia-kassandras/kentriki/ . Hellas Gold and EIA/ESIA consultants available to respond to any questions. Feedback	Stakeholders (external and internal) that were met in the previous engagement rounds of September–October 2021, including vulnerable groups and directly affected communities in the Social Aol Key local community leaders Environmental NGOs, Project opponents All interested stakeholders, including from the Social Aol, as well as national/international stakeholders and interested parties	Weeks 3-8 of ESIA Disclosure (60-day period – spring 2022)	Hellas Gold, ENVECO, Sympraxis, ERM

Engagement Activity	Objective	Format of Engagement	Target Stakeholder(s)	Timing/Frequency	Responsibility & Support
		collected either by mail, post, email, phone, or grievance boxes (see Table 6.2-2, Feedback Collection Mechanism during ESIA Disclosure).			
Summarise stakeholder feedback from disclosure process and integrate stakeholder feedback into the Final ESIA (as needed)	Report on disclosure feedback and integrate it into the Final ESIA as appropriate.	Preparation and distribution of a summary report on disclosure and how submissions have been considered and addressed.	All interested stakeholders	After the 9-week (60-day) ESIA Disclosure	Hellas Gold, ENVECO, ERM
Post EIA/ESIA Disclosure					
Meetings with local suppliers regarding Project procurement opportunities	Per Community Development Management Plan, support local participation in Project procurement	Targeted meetings/workshops	Business stakeholders, including local contractors	Periodically, as there will be procurement opportunities over the life of the Project	Hellas Gold
Meetings with key stakeholders around the employment/training strategy	Per Community Development Management Plan, support local participation in Project employment	Targeted meetings/focus groups	Potential Project employees	Periodically, as there will be employment/training opportunities over the life of the Project	Hellas Gold
Meetings with key stakeholders around the implementation and monitoring of the CSR strategy and Community Development Management Plan	Collect feedback on the priorities for development of the Social Aol, objectives for each funding pillar, and eligibility criteria for projects Follow through on implementation of mitigation measures and related Project benefits	CIC meetings Targeted meetings/focus groups	CIC Key government representatives Key stakeholders as identified in this SEP	Annually, in line with the commitment included in the 2021 New Investment Plan to implement a CSR program over a 25-year period	Hellas Gold

Engagement Activity	Objective	Format of Engagement	Target Stakeholder(s)	Timing/Frequency	Responsibility & Support
Meetings with key stakeholders around emergency response and preparedness and changes in health	Per the Community Health and Safety Management Plan, develop key Community Health, Safety, and Security indicators that can be collected and monitored over the life of the Project; engage community members, government, and other stakeholders in Emergency Prevention and Response and Security Management Planning; engage around participation in appropriate mock emergency event scenarios/ training sessions; and train community members and relevant government and medical response entities on emergency procedures	CIC Targeted meetings, focus groups Simulation of emergency event scenarios and practising response	Affected communities in the Social AOI Key government representatives Key stakeholders involved in the provision of emergency-related public services (e.g., health and public security authorities)	Periodically per timeframes defined in the Community Health and Safety Management Plan Annually for training and mock scenarios	Hellas Gold
Ongoing engagement with affected communities and key stakeholders	Facilitate collaboration with priority stakeholders Collect feedback as indicated in Section 8.2 of this SEP and required by the referenced management plans	Targeted meetings; individual meetings, focus groups	Local communities in the Social AOI (including vulnerable groups) Key local and regional authorities and other stakeholders	Quarterly	Hellas Gold
Engage with stakeholder representative groups in the communities of the Social AOI to identify members of the CIC	Establish CIC with membership representing cross-section of stakeholders and stakeholder interests (based on stakeholder mapping)	Targeted meetings; individual meetings, focus groups	Key local and regional authorities Affected communities in the Social AOI (including vulnerable groups)	By June 2022	Hellas Gold

Engagement Activity	Objective	Format of Engagement	Target Stakeholder(s)	Timing/Frequency	Responsibility & Support
Regular meetings of CIC	Facilitate ongoing collaboration and participation; facilitate local involvement in the implementation of E&S mitigation measures and impact monitoring Share information regarding how the community investment projects have been selected and how the implementation is progressing Review and discuss community concerns and issues, including those submitted through the GMF	CIC meetings	CIC	Quarterly	Hellas Gold
Regular meetings with workers and unions	Inform about worker grievance mechanism Per Labour Management Plan, implement mitigation measures with relevance to worker health and safety and labour and working conditions	Targeted meetings, focus groups	Workers and unions (internal stakeholders)	Quarterly	Hellas Gold
Annual consultations with affected stakeholders to undertake a perception survey	Monitor changes in the public opinion to the Project	Targeted meetings; individual meetings; focus groups	Representatives of the affected communities in the Social Aol (including vulnerable groups) Key local and regional authorities and other stakeholders Influx	Annually	Hellas Gold
Ongoing disclosure of Project information, including GMF reporting	Provide updates about the Project and key construction milestones	CIC meetings, newsletter, website update, social media	CIC All interested stakeholders	Quarterly	Hellas Gold

Engagement Activity	Objective	Format of Engagement	Target Stakeholder(s)	Timing/Frequency	Responsibility & Support
Series of meetings with key stakeholders to update the social baseline study	Gather community-level data to update the social baseline Characterize opposition (sources, scale and position) Solicit informed feedback on the Project, potential impacts, and management measures	Key informant interviews, focus group discussions	Key authorities Other key stakeholders Affected communities (including vulnerable groups) in the Social Aol Environmental NGOs, Project opponents	Meetings every 5 years starting in 2023. Baseline update every 5 years.	Hellas Gold
Meetings with key stakeholders around road and marine safety	Per the Traffic and Transport Management Plan, engage with stakeholders to implement a road safety and traffic awareness programme and manage and discuss any health- and safety-related concerns related to marine traffic	Key informant interviews, targeted meetings, focus group discussions	Affected communities (including vulnerable groups) in the Social Aol Local boaters Port Authority	Periodically over the life of the Project for awareness raising and quarterly for engagement with local boaters	Hellas Gold
Meetings with key stakeholders around influx management	Per the Influx Management Plan, engage with stakeholders to coordinate on monitoring and management efforts related to influx	Targeted meetings/focus groups, individual meetings	Local communities in the Social Aol (including vulnerable groups) Local government officials, community councils and presidents, and public health and safety officials	Quarterly	Hellas Gold
Ongoing disclosure of the environmental monitoring programme results	Communicate results obtained through monitoring of the environmental parameters	"Environmental Monitoring Results Viewer" application Annual technical reports	All interested stakeholders	Annually	Hellas Gold
Regular meetings with workers and unions	Consult on redundancy planning	Targeted meetings	Workers and unions (Internal stakeholders)	As needed to reach a Redundancy Plan that is accepted by both Company and the internal stakeholders	Hellas Gold

Engagement Activity	Objective	Format of Engagement	Target Stakeholder(s)	Timing/Frequency	Responsibility & Support
Targeted meetings as part of a formal Closure Social Impact Assessment study	Share information about Project closure plans Identify and manage potential negative impacts associated with Project closure and identify and enhance opportunities for post-closure development and sustainability	Key informant interviews Focus Group discussions Surveys (as appropriate)	Project-affected stakeholders	Not less than 5 years prior to planned closure	Hellas Gold

CIC = Community of Interest Committee; CSR = Corporate Social Responsibility; E&S = Environmental and Social; EBRD = European Bank for Reconstruction and Development; EIA = Environmental Impact Assessment; ERM = Environmental Resources Management; ESIA = Environmental and Social Impact Assessment; GMF = Grievance Management Framework; NGO = non-governmental organization; NTS = Non-technical Summary; SEP = Stakeholder Engagement Plan; Social Aol = Social Area of Influence; TBD = to be determined

°These can be seen as "public hearings" also not formally called as such in Greek Legislation

ANNEX IV: GRIEVANCE FORM (IN ENGLISH AND GREEK)

Third Party Grievance Submission Form

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

Full name of complainant: If the complaint is filed for another person, please provide their names and contact details.	First Name		
	Last Name		
	Gender	<input type="checkbox"/> Male	<input type="checkbox"/> Female
	Phone Number		
	Village/Area		
	Town ZIP Code		
	GPS Coordinates	Lat: <input type="text"/>	Lon: <input type="text"/>
	Complainant confidentiality: * Please be aware that if your complaint is about another person, the person handling your complaint will generally need to disclose details of the complaint to that person to obtain their response. ** In case of anonymous grievances we cannot communicate the response to you, but will publish the case and the response in the annual grievance report and on our website.	<input type="checkbox"/>	I request not to disclose my identity without my consent*
<input type="checkbox"/>		I wish to raise my grievance anonymously**	

Contact Information Please mark how you wish to be contacted. Please also provide an additional telephone number/of next of someone	Telephone	
	Postal Address:	
	Address	
	Town/Village	
	ZIP code	
	Province	
	Additional telephone number of next of kin/contact person (in case you cannot be reached)	
	Email (if available)	

Preferred language	
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Information about status of complainant	
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GRIEVANCE DETAILS	
Date of incident (DD/MM/YYYY):	
Description of incident: What happened? When? How? Why? Who did it happen to? What is the result of the problem? (Please use additional sheets if necessary)	
Frequency/Status of incident.	<input type="checkbox"/> One time incident/grievance <input type="checkbox"/> On-going <input type="checkbox"/> Recurring: How many times and when and reason?
Additional supporting documentation.	If possible, provide evidence or other relevant additional information:
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.	
Date (DD/MM/YYYY):	
If representing complainant, please state your name, address and contact info:	
Name:	Contact Phone:
Signature	
I hereby declare that the above given information is true in my knowledge.	


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)

Πλήρες όνομα του υποβάλλοντος: Εάν η αναφορά συμπληρώνεται από άλλο άτομο παρακαλείσθε να συμπληρώσετε τα ονόματα σας καθώς και τα στοιχεία επικοινωνίας σας Εμπιστευτικότητα υποβάλλοντος την αναφορά: * 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	Όνομα		
	Επώνυμο		
	Φύλο	<input type="checkbox"/> Άνδρας	<input type="checkbox"/> Γυναίκα
	Αριθμός Τηλεφώνου		
	Village/Area		
	Ταχυδρομικός Κώδικας		
	GPS Συντεταγμένες	Πλάτος:	Μήκος:
	<input type="checkbox"/>	Ζητώ να μη γνωστοποιηθεί η ταυτότητά μου χωρίς τη συγκατάθεσή μου*	
	<input type="checkbox"/>	Θέλω να υποβάλω την αναφορά μου ανώνυμα**	

Στοιχεία επικοινωνίας Παρακαλείσθε να επιλέξετε τον τρόπο με τον οποίο επιθυμείτε να επικοινωνήσουμε μαζί σας. Παρακαλείσθε, όπως μας δηλώσετε τον αριθμό τηλεφώνου/εναλλακτικού προσώπου επικοινωνίας	Τηλέφωνο		
	Ταχυδρομική Διεύθυνση:		
	Διεύθυνση		
	Πόλη/Χωριά/Κοινότητα		
	Ταχυδρομικός κώδικας		
	Περιοχή		
	Αριθμός τηλεφώνου συγγενικού προσώπου/ατόμου επικοινωνίας (σε περίπτωση μη ευρέσεως σας)		
	e-mail (εάν διατίθεται)		

Επιθυμητή γλώσσα	
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Πληροφόρηση σχετικά με την κατάσταση του	
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ΛΕΠΤΟΜΕΡΕΙΕΣ ΑΝΑΦΟΡΑΣ	
Ημερομηνία συμβάντος (Ημέρα/Μήνας/Έτος): 	
Περιγραφή του συμβάντος: Τι συνέβη; Πότε; Γιατί; Ποιος το προκάλεσε; Ποιο είναι το αποτέλεσμα του προβλήματος;	
Συχνότητα/Πορεία Συμβάντος	<input type="checkbox"/> Μεμονωμένα Περιστατικά/Αναφορά <input type="checkbox"/> Συνεχίζόμενο <input type="checkbox"/> Επαναλαμβανόμενα: Πόσες φορές και πότε και το λόγο?
Επιπρόσθετα υποστηρικτικά στοιχεία	Εάν είναι εφικτό, υποβάλλετε αποδεικτικά στοιχεία ή οποιαδήποτε επιπλέον πληροφόρηση:
ΣΥΝΑΙΝΕΣΗ ΠΑ 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 υπβλήθηκε 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 περιγράφηκε 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 προβάλω 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 κατανόω πλήρως όλα τα προαναφερόμενα και αποδέχομαι τα δικαιώματά μου.	
Ημερομηνία (Ημέρα/Μήνας/Έτος): 	
Εάν εκπροσωπείτε τον υπβάλλοντα την αναφορά παρακαλείσθε όπως δηλώσετε το όνομα και τα στοιχεία επικοινωνίας σας	
Όνομα: 	Τηλέφωνο:
Υπογραφή:	
Επιβεβαιώνω ότι όλες οι ανωτέρω πληροφορίες είναι αληθείς και έχω λάβει γνώση αυτών.	

ANNEX V: EXCERPT OF THE GRIEVANCE MASTER REGISTER

Table A5-1: 3rd Party & Workers' Grievance Master Register



3rd Party & Workers' Grievance Master Register

Department: CSR & SE
 Director: Ioannis Maleganos
 Grievance Coordinator: Ioannis Papakostas
 Updated: 19/1/2022

No	Year	PROJECT LOCATION (Village)	GRIEVANCE Name Folder	Source	STAKEHOLDER NAME	STAKEHOLDER SURNAME	Stakeholder details	CONTACT NUMBER	CONTACT EMAIL	CONTACT ADDRESS:	DETAILED DESCRIPTION	GRIEVANCE CATEGORY	Tier	Severity	GIS Coordinates	

Responsible work stream	Responsible staff member	SUBMISSION SOURCE	DATE OPENED (DD/MM/Y YYYY)	Aknowlegement (Yes/ No) Date (DD/MM/YYYY)	STATUS	DATE CLOSED (DD/MM/Y YYYY)	DUE DATE (DD/MM/Y YYYY)	Way of contact-Closure status	INVESTIGATION TRAIL	ACTION TAKEN	If a resolution was offered please indicate 'accepted' or 'not accepted'.	Follow Up	SUPPORTING DOCUMENTS	SUPPORTING NOTES

ANNEX VI: ELDORADO HUMAN RIGHTS POLICY (IN ENGLISH AND GREEK)

HUMAN RIGHTS POLICY

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.



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.

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, benefitting 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.

Approved by the Board February 24, 2022

ΠΟΛΙΤΙΚΗ ΑΝΘΡΩΠΙΝΩΝ ΔΙΚΑΙΩΜΑΤΩΝ

Η Eldorado Gold Corporation («Eldorado») δεσμεύεται να ενσωματώνει τη βιωσιμότητα σε κάθε πτυχή της δραστηριότητάς της, όπως αυτή περιγράφεται στο Πλαίσιο Βιωσιμότητας της εταιρείας.

Εστιάζουμε στον σεβασμό για τα ανθρώπινα δικαιώματα. Η προμήθεια και εξόρυξη του χρυσού γίνεται με τρόπο υπεύθυνο χωρίς εντάσεις ή συγκρούσεις. Παράλληλα, στηρίζουμε τις τοπικές κυβερνήσεις στις προσπάθειές τους για την προστασία των ανθρωπίνων δικαιωμάτων και την πρόληψη των παραβιάσεων αυτών.



Σκοπός

Σκοπός της παρούσας Πολιτικής είναι να διατυπώσει τις δεσμεύσεις της Eldorado για τα ανθρώπινα δικαιώματα, τις προδοκίες της Εταιρείας από τους εργαζόμενους και τους εργολάβους της, καθώς και τη δέσμευσή μας να συνεργαστούμε με τους κοινωνικούς εταίρους που επηρεάζονται από τις δραστηριότητές μας, με σκοπό την υποστήριξη του Πλαισίου Βιωσιμότητας που υιοθετεί ο οργανισμός.

Αντικείμενο

Η Πολιτική Ανθρωπίνων Δικαιωμάτων της Eldorado καθώς και η διοικητική της προσέγγιση εδράζονται στα ακόλουθα διεθνή πλαίσια:

- Διεθνής Χάρτης των Ανθρωπίνων Δικαιωμάτων (International Bill of Rights)
- Διακήρυξη για τις Θεμελιώδεις Αρχές και Δικαιώματα στην Εργασία (Declaration on Fundamental Principles and Rights at Work) της ΔΟΕ (Διεθνής Οργάνωση Εργασίας)
- Κατευθυντήριες Αρχές των Ηνωμένων Εθνών για τις Επιχειρήσεις και τα Ανθρώπινα Δικαιώματα (UN Guiding Principles on Business and Human Rights)
- Διακήρυξη των Ηνωμένων Εθνών για τα Δικαιώματα των Αυτοχθόνων Λαών (UN Declaration on the Rights of Indigenous Peoples)
- Δέκα Αρχές του Οικουμενικού Συμφώνου των Ηνωμένων Εθνών (UN Global Compact)
- Εθελοντικές Αρχές για την Ασφάλεια και τα Ανθρώπινα Δικαιώματα (Voluntary Principles on Security and Human Rights)
- Κατευθυντήριες αρχές, πλαίσια και σχετική καθοδήγηση της Πρωτοβουλίας «Με στόχο τη βιώσιμη εξόρυξη» (Towards Sustainable Mining) της Ένωσης Μεταλλείων Καναδά (Mining Association of Canada)
- Αρχές Υπεύθυνης Εξόρυξης Χρυσού (Responsible Gold Mining Principles) του Παγκόσμιου Συμβουλίου Χρυσού (World Gold Council)
- Πρότυπο Χρυσού «Χωρίς Συγκρούσεις» (Conflict-Free) του Παγκόσμιου Συμβουλίου Χρυσού

Το Ολοκληρωμένο Σύστημα Διαχείρισης Βιωσιμότητάς της εταιρείας μας (Sustainability Integrated Management System, SIMS), θεσπίζει απαιτήσεις βιωσιμότητας σε εταιρικό επίπεδο, οι οποίες εναρμονίζονται με τα προαναφερθέντα διεθνή πλαίσια, προκειμένου να διασφαλίζεται η συνεπής εφαρμογή και τήρησή τους, στο σύνολο των λειτουργιών μας.

Η εταιρεία αναμένει από όλους τους εργαζόμενους και συνεργάτες της να τηρούν την παρούσα Πολιτική Ανθρωπίνων Δικαιωμάτων και τις σχετικές απαιτήσεις του SIMS. Οι εργαζόμενοι και συνεργάτες μας πρέπει να αναγνωρίζουν τις παραβιάσεις ανθρωπίνων δικαιωμάτων και να είναι ενήμεροι σχετικά με τους διαθέσιμους μηχανισμούς για την υποβολή αναφορών/παράπονων και την αναφορά παραβιάσεων των ανθρωπίνων δικαιωμάτων.

Η Eldorado δεσμεύεται:

1. Να σέβεται τα ανθρώπινα δικαιώματα, όπως αυτά ορίζονται στο Διεθνή Χάρτη των Ανθρωπίνων Δικαιωμάτων και στη Δήλωση για τις Θεμελιώδεις Αρχές και Δικαιώματα στην Εργασία της ΔΟΕ. Να επιδιώκει τη διεξαγωγή των επιχειρηματικών δραστηριοτήτων της με τρόπο που δεν προκαλεί ούτε συναινει σε παραβιάσεις των ανθρωπίνων δικαιωμάτων είτε άμεσα είτε μέσω των επιχειρηματικών μας σχέσεων.

2. Να σέβεται τα δικαιώματα του εργατικού δυναμικού της, των μελών της τοπικής κοινωνίας και όλων των ενδιαφερόμενων μερών με τα οποία αλληλεπιδρούμε. Προσδοκά από τους επιχειρηματικούς της εταίρους, όπως πάροχοι υπηρεσιών ασφαλείας, εργολάβοι και προμηθευτές, να δεσμεύονται και αυτοί με τη σειρά τους για την προστασία των ανθρωπίνων δικαιωμάτων, όπως τα δικαιώματα που αφορούν τις συνθήκες εργασίας, την ελευθερία του συνεταιρίζεσθαι, την ελευθερία του λόγου, τις συλλογικές διαπραγματεύσεις, το μέγιστο ωράριο εργασίας, τις δίκαιες αμοιβές και παροχές, τις ίσες ευκαιρίες και την καταπολέμηση των διακρίσεων.
3. Να εξετάζει τακτικά για τυχόν αλλαγές στο ρυθμιστικό ή νομοθετικό πλαίσιο στις χώρες όπου δραστηριοποιείται, να διενεργεί αξιολογήσεις επιπτώσεων και να εφαρμόζει τη δέουσα επιμέλεια για τον εντοπισμό κινδύνων για τα ανθρώπινα δικαιώματα που σχετίζονται με τις δραστηριότητές μας, με σκοπό την πρόληψη και τον μετριασμό δυσεμίων επιπτώσεων.
4. Να μην προβαίνει σε διακρίσεις σε βάρος οποιoδήποτε ατόμου με βάση τη φυλή, την ταυτότητα φύλου, τη θρησκεία, την ηλικία, την κοινωνική κατάσταση, τον γενετικό προσαρμοτισμό ή οποιοδήποτε άλλο χαρακτηριστικό που δεν σχετίζεται με τις επαγγελματικές επιδόσεις του ατόμου.
5. Να επιδενύνει μηδενική ανοχή όσον αφορά ασεβή ή ανάρμοστη συμπεριφορά, παρενόχληση, εκφοβισμό ή άδικη μεταχείριση, ούτε τυχόν αντίποινα από τους υπαλλήλους, προμηθευτές ή επιχειρηματικούς μας εταίρους.
6. Να σέβεται τα ανθρώπινα δικαιώματα ατόμων που χρήζουν ιδιαίτερης προσοχής, όπως γυναίκες, παιδιά, αυτόχθονες πληθυσμοί και άλλες δυναμικά ευάλωτες ή περιθωριοποιημένες ομάδες.
7. Να σέβεται τα συλλογικά και εθμικά δικαιώματα, τα συμφέροντα, τον πολιτισμό και τους δεσμούς με τη γη των άμεσα επηρεαζόμενων αυτόχθονων πληθυσμών, εάν κατοικούν στην περιοχή επιρροής. Θα επιδιώκουμε να λαμβάνουμε την ελεύθερη, έγκαιρη και έγκυρη συναίνεσή τους προτού προχωρήσουμε στην ανάπτυξη του έργου και καθ' όλη τη διάρκειά του.
8. Να απογορεύει και να εξαιλεί την παιδική και καταναγκαστική εργασία, καθώς και τη σύγχρονη δουλεία στις επιχειρήσεις και την εφοδιαστική της αλυσίδα.
9. Να διαχειρίζεται τους κινδύνους για τα ανθρώπινα δικαιώματα που σχετίζονται με την ασφάλεια μέσω της εφαρμογής των Εθελοντικών Αρχών για την Ασφάλεια και τα Ανθρώπινα Δικαιώματα (Voluntary Principles on Security and Human Rights).
10. Να μην προκαλεί, υποστηρίζει, επιωφελείται ή συνεισφέρει σε παράνομες ένοπλες συγκρούσεις, καταστάσεις ανθρωπίνων δικαιωμάτων ή παραβιάσεις του διεθνούς ανθρωπιστικού δικαίου.
11. Να θεσπίζει δίκαιους, προσβάσιμους, αποτελεσματικούς και έγκαιρους μηχανισμούς υποβολής καταγγελιών από τα ενδιαφερόμενα μέρη, καθώς και επίλυσης αυτών χωρίς τον κίνδυνο επιβολής διακρίσεων ή αντιποινών.

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