



**eldorado** gold



**Corporate Social Responsibility  
Community Investment Procedure-  
Manual**






<b>Document Reference</b>	<b>Version Number</b>	<b>Total Pages</b>	<b>Original Issue Date</b>	<b>Effective Date</b>
HG-01-S-TAM-0003-A-ENG	03	34	01/01/2023	01/10/2024

## Document Control & Key Information

### Version History

Version	Effective Date	Change Description
1.0	01/01/2023	First Issuance
2.0	01/01/2024	
3.0	01/10/2024	<ul style="list-style-type: none"> <li>- Review &amp; update frequency of the document added, pg. 2.</li> <li>- Incorporating Hellas Gold's fundamental Pillars and alignment with the CIP</li> <li>- Revision of the indicative annual budget distribution.</li> <li>- Revision of the CSR Committee evaluation process.</li> <li>- Revision of the Pre-evaluation form.</li> <li>- Revision of the KPIs for evaluating progress and outcomes.</li> <li>- Incorporating a process flow chart annex IV</li> </ul>

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### Review and Update of the Document

The Corporate Social Responsibility Process will be reviewed and updated on an annual basis. This will ensure the alignment with all relevant frameworks and policies of the Company and the integration of potential organizational changes. If it is deemed necessary by Hellas Gold executives, this process may be reviewed and updated more frequently.

## Related Documents

Reference	Title
IEMS	Integrated Environmental Management System
SIMS	Sustainability Integrated Management System
ESMS	Environmental and Social Management System
ESMP	Environmental and Social Monitoring Plan
EMS	Environmental Monitoring System
	Social Performance Policy
	Human Rights Policy
	Environmental Policy
	Health & Safety Policy
	Code of Conduct and Business Ethics
	Anti-Bribery and Anti-Corruption Policy
	Stakeholder Engagement Framework and Plan
CDP	Community Development Management Plan (HG-01-S-TAM-0003-A-ENG)
CIP	Community Investment Plan (HG-01-S-TAM-0003-A-ENG)
	Community Health, Safety & Security Management Framework
	Grievance Mechanism Framework & Process
CoC	Community of Interest Committee Framework
	Contractors Safety Regulation
	Respectful Workplace Policy
	Diversity Policy

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# 1. Corporate Social Responsibility Process

## 1.1 Our CSR Pillars and Strategic Objectives

Guided by our purpose – work together with local communities and build trusting relationships – we are determined to do our best towards implementing an effective, environmentally friendly and socially inclusive CSR program.

To this respect, our CSR program is structured around the following four (4) main pillars in alignment with the CDP and CIP:

- i. **Labour management and local employment:** Ensuring safe and efficient work conditions in compliance with relative regulations while prioritizing local employment to support our communities.
- ii. **Local procurement and contractor/ supplier management:** Sourcing goods and services from nearby suppliers to strengthen local economic development while establishing trustful and transparent contractor and supplier engagements.
- iii. **Community investment:** Focusing on impactful community investments in alignment with local society needs, transforming our communities.
- iv. **Additional activities:** i) Addressing local housing needs, ii) implementing efficient influx<sup>1</sup> management and iii) establishing sustainable closure plans in conjunction with the development of a post mining economy.

To effectively address challenges under the afore-mentioned pillars we implement community investment activities based on the following five (5) CSR strategic objectives of Hellas Gold:

- I. Facilitate the **growth of the local economy** (mining supply chain and parallel economy).
- II. Promote **educational opportunities for youth** within the local communities.
- III. Strengthen local **community resilience** to environmental and climate change impacts.
- IV. Support **access to healthcare** services for vulnerable groups within local communities.
- V. Contribute to capacity building on **gender equality and inclusion** in the local communities.

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<sup>1</sup> Identifying socio-economic risks, impacts and opportunities that may result from project-induced or project-related influx such as resources, human capital, equipment etc.

## 1.2 Identification and Categorization of Community Investment Activities

The Community Investment actions within our program are grouped into three main categories as described next.

### 1.2.1 Strategic Initiatives, Community Investment Activities and Corporate Volunteer/ Humanitarian Initiatives

These actions are identified through the stakeholder engagement activities (internal and external) and address local community needs, concerns and social gaps, promote social inclusion, gender diversity and, in general, sustainable economic development. Such actions in alignment with our pillars, indicatively, may include:

- Upskilling of local community human capital, oriented towards entrepreneurship, financial literacy and technology skills building. By investing in these areas, Hellas Gold can empower individuals to better participate in the local economy, drive innovation and contribute to sustainable local economic growth and job creation.
- Support to vulnerable groups (e.g., the elderly, unemployed, people living in remote villages/ areas) through the establishment and improvement of public health structures and infrastructure actions, offering to the community access to all medical specialties, as well as to specialized medical equipment.
- Knowledge sharing and training provided to wider local society with a particular focus on disadvantaged people. Indicatively this may include training on the use of banking services, interactions with the public sector, communications, etc., with the aim to facilitate the completion of daily tasks.
- Promotion of technology and engineering solutions to upgrade local infrastructure in an environmentally friendly manner and lead to social prosperity and sustainable development. Applications can be in the sectors of tourism, agriculture, land reclamation, protection of the environment and biodiversity, mining etc.
- Fostering the creation of a suppliers' ecosystem that reinforces the local economy through targeted and efficient procurement processes.
- Establishing solutions related to influx management, while designing effective closure plans that prioritize the well-being of the community and set the foundations for a post-mining economy.
- Corporate volunteering/ humanitarian initiatives<sup>2</sup> promoting employee engagement and boosting internal organizational creativity towards common goal; supporting local communities.

### 1.2.2 Local Community, Regional and National Requests

These include Community Investment requests on an annual basis which aim to support initiatives or needs of specific local communities or wider populations.

The CSR action implementation phase includes the processes that are described in detail below.

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<sup>2</sup> It is noted that up today Hellas Gold has not established a policy for corporate volunteering/ humanitarian initiatives, as a result, such actions do not take place yet.

## 1.3 Community Investment Planning

### 1.3.1 Long-Term Plan

The Hellas Gold CSR & Social Performance Department shall establish a long-term plan in pursuance of the CDP and CIP including the long-term vision for society, environment, and people. This plan should **take into consideration the community needs and priorities stemming from the stakeholder engagement processes**, be goal driven and achievable. In addition, this plan should take into account the allocated CSR budget of \$ 80 mm (USD) for the whole 25-year life cycle of the Cassandra Mines.

The long-term plan is part of an overall long-term ESG corporate approach as well as community needs. More specifically, this plan shall include the following:

- i. List of strategic CSR and volunteering/ humanitarian initiatives addressing community needs in the long run considering environmental, social and business challenges.
- ii. Detailed presentation of prioritized Community Investment actions, initiatives, or programs.
- iii. How will such actions or programs be implemented.
- iv. The modalities of utilization of funds and implementation schedules for the actions or programs (the annual proposed budget is formulated in accordance with relevant agreements).
- v. Monitoring and reporting mechanism for the Community Investment actions or programs.
- vi. Details of impact assessment of any proposed strategic emblematic actions.

After the completion of the long-term Plan, the Hellas Gold CSR & Social Performance Department recommends it for approval to the Eldorado Gold Vice President & General Manager Greece and Eldorado Gold Sustainability Senior Director.

### 1.3.2 Annual Planning

The CSR & Social Performance Department is responsible for annually identifying strategic CSR initiatives and corporate volunteering/humanitarian initiatives. Throughout the year, the department conducts stakeholder engagement activities (both internal and external) based on input from the Community of Interest Committee (CiC) and the validated stakeholder engagement plan. These activities aim to capture and address the concerns, expectations, and needs of the local community. The stakeholder engagement outcomes and feedback are analyzed and assessed against the Hellas Gold CDP and CIP. This task is coordinated by the CSR Supervisor and Community Relations Coordinator- and is carried out by the CSR Officers and the Community Liaison Officers (CLOs). A brief report with the proposal of potential CSR initiatives is composed by the CSR Officers and CLOs to recommend forms of action and the respective regions. In addition, guided by the belief that every employee of Hellas Gold should be able to have a positive impact on society and planet, the CSR Officers should internally communicate with all the other Hellas Gold Departments (mainly with Human Resources, Health & Safety, Environment and Communications) and come up with a list of potential corporate volunteering/ humanitarian initiatives on an annual basis. A corporate volunteerism program can offer long-term rewards through employee retainment, engagement, and customer loyalty.

Overall, the identified Community Investment actions and initiatives and any proposed corporate volunteer activities should be in compliance with the Hellas Gold CDP and CIP and reviewed by the CSR Supervisor. The CSR Supervisor proposes to the Eldorado Gold Head of Sustainability Greece and to the Eldorado Gold Vice President, Commercial, Growth and External Relations Greece and Eldorado Gold Sustainability Senior Director in order to be reviewed and approved.

### 1.3.3 Budget Preparation and Approval

Based on the annual plan including the strategic Community Investment actions and other requests, the CSR Supervisor and the Eldorado Gold Head of Sustainability Greece prepare the annual budget. The Executive Vice President Development Greece, the Eldorado Gold Vice President, Commercial, Growth and External Relations Greece and Eldorado Gold Chief Financial Officer (CFO) review and approve the CSR budget in accordance with Hellas Gold and Eldorado Gold Corporation budgetary processes and procedures.

An indicative budget distribution on an annual basis can be the following:

- **70%** of the overall budget, is intended to be invested in strategic social programs including volunteering humanitarian initiatives.
- **30%** of the overall budget, is intended to be invested in rapid response fund to address urgent and high priority needs in an agile manner.

The submission deadline for urban planning and infrastructure Community Investment actions, including technical works, is set for **June 30th of the previous year**. This ensures that these actions are included in the proposed budget for the following year.

### 1.3.4 Monitoring of the Plan Execution

A delegated person of the CSR & Social Performance Department, preferably one of the CSR Officers undertakes and monitors the execution of the plan and informs of any deviations noted.



## 1.4 Community Investment Program Implementation

### 1.4.1 Management of Local, Regional and National Stakeholder Requests

#### i. Request Receipt

Incoming requests can be received through:

- E-mails, sent to [GR-CSRrequests@eldoradogold.com](mailto:GR-CSRrequests@eldoradogold.com) or to CSR Officers e-mail accounts.
- The official electronic CSR Request Submission Form on the website of Hellas Gold S.M. SA. <https://www.hellas-gold.com/viwsimothta/etairiki-koinoniki-efthyni#section-3>
- Verbal or written communication with community authorities, councils, associations representatives (by the CLO's in Hellas Gold Community Office), etc.

When requests are received verbally or via the e-mail accounts of CSR Department's staff, a follow-up written request must be submitted.

In addition, requestors must deliver the following information and documentation:

- Technical description of the requested CSR action.
- Initial Cost estimation.
- Estimated timeline for implementation etc.
- Any required supporting documents (permits and/or licenses) in case of infrastructure/ construction project.
- Beneficiary's legal documentation.
- When the request is not submitted by the beneficiary (in case of a natural person) or his/ her representatives/ agents, a statement certifying that the beneficiary has given explicit consent to the processing of his/her personal data.

After the receipt of the request by Hellas Gold, the requestor receives by our Company (through e-mail and/ or a link) the **Personal Data Protection Notice (Appendix III)** providing information on the processing of personal data taking place by our Company in the context of undertaking and implementing Community Investment actions.

#### ii. Request Recording

Incoming requests are monitored and recorded in the Local, Regional, National stakeholder requests log by the responsible CSR Officer. The CSR Department registers these incoming requests in an electronic database (Master File Log), capturing all required data, including dates, descriptions of the CSR action requests, handover person, form of CSR contribution, initial budget, and etc.

Occasionally, requests from the national level may be received through the Eldorado Gold Vice President, Commercial, Growth and External Relations of Greece or Hellas Gold Senior Executives. These executives will then forward the requests to the CSR and Social Performance Department for recording in the Master File Log. In alignment with CIP and CDP of Hellas Gold and Eldorado Gold Corporation, the Community Investment actions are classified in the following strategic pillars:

1. **Community Safety and Resilience**
2. **Promote a sustainable Health Care**
3. **Contribute to developing gender equality**

4. **Support educational opportunities for the youth**
5. **Support the development of the local mining economy**
6. **Reactive activities / Ad hoc**

iii. **Request Receipt Confirmation and Requestor Verification.**

The responsible CSR Officer confirms the receipt of the request to the submitting stakeholder. The confirmation can be provided by:

- ✓ **Verbal confirmations, for local community requests:**  
All verbal confirmations must be documented by a follow-up written confirmation.
- ✓ **Standardized e-mail confirmations:**  
For national level requests (sent to the requestor within 5 days from receipt).

The CSR & Social Performance Department verifies the identity and position of the requestor prior to the evaluation of the request. Regarding the request's official acceptance by Hellas Gold, it is noted that requests must be sent by an official e-mail account that can be linked to the requestors' organizational affiliation. Should this not be possible, the CSR & Social Performance Department will seek to verify the authenticity of the request through further evidence.

It is noted that there may be occasions in which a Community Investment is proposed and initiated by Hellas Gold. In these occasions Hellas Gold submits a "**Proposal Letter**" explaining its intention to proceed with a Community investment activity without the prior request by a stakeholder.

Nevertheless, the implementation process of the proposed action remains the same as described below.

#### 1.4.2 Evaluation and Approval

After the CSR request receipt, the Community Investment pre-evaluation form (found in [Appendix II](#)) is completed by the CSR team. The evaluation of the incoming Community Investment requests takes into consideration the criteria and priorities as per the CDP and CIP as well as their potential social impact. The incoming requests relating to management of emergency conditions i.e., ameliorating and mitigating the impact of (natural) disasters, extreme weather conditions, are urgently treated on ad-hoc basis.

##### 1.4.2.1 Initial Request Evaluation

The responsible CSR Officer performs an initial screening of a request through the following steps:

- Considering the estimated budget for the action implementation.
- Collecting any required financial and technical specifications from third party suppliers.
- Acquiring other necessary documents regarding the requestor's organization and/or the action.
- Examining the sum of the evaluation criteria as mentioned in CDP and CIP.

To this respect the Community Investment pre-evaluation form found in [Appendix II](#) is completed

by the CSR Officer to facilitate the evaluation process.

It is noted that the submission of requests related to technical works/ infrastructure actions, must be followed by the relevant approvals/ permits and licenses to be evaluated.

A weekly meeting between the CSR Supervisor and the CSR Officers, is organized to review all the incoming requests and resolve any pending issues. Subsequently, the CSR Supervisor submits all the eligible requests to the Eldorado Gold Head of Sustainability Greece and the CSR Committee (described below), alongside with the results of the initial (internal) evaluation and the initial cost estimations for review.

#### 1.4.2.2 Final CSR Committee Evaluation

Hellas Gold has established a **CSR committee** with the purpose to oversee the CSR & Social Performance Department activities and investments. The CSR committee review the requests after the initial evaluation and decide for their approval or rejection.

The request is submitted along with the pre-evaluation form by the CSR & Social Performance Department to the respective CSR Committee according to the authority designated to each one:

- i. The Eldorado Gold Head of Sustainability Greece is responsible for the review and the decision of approval for requests with an estimated budget up to **€ 10.000**.  
The decision is communicated via e-mail to the Eldorado Gold Vice President & General Manager Greece, the General Executive Director and the Chief Financial Officer (CFO).  
It is also noted that the Eldorado Gold Head of Sustainability Greece is responsible for the review and decision of approval for the annual recurring Community Investment actions and ad-hoc emergency actions.
- ii. The **CSR Committee** is responsible for the review and the decision of approval for requests with an estimated budget between **€ 10.000 and € 100.000**. The members of the **CSR Committee** are the General Executive Director, the Vice President Commercial Growth and external relations, the Eldorado Gold Head of Sustainability Greece, the Chief Financial Officer (CFO), the General Counsel and Company Secretary Legal.  
The decision is communicated via email to the Eldorado Gold Executive Vice President Development Greece, the Project Director – Skouries, the Environmental Manager, the Permitting Manager and the Director of Corporate Affairs and Communications.
- iii. For approval of requests over **€ 100.000** any Community Investment is being reviewed by the SIMS Country Leadership and SIMS Executive Leadership prior to authorization to ensure proper mitigation of compliance – related risks. Any Community Investment to the benefit of any Government beneficiary (or made through a Government entity or official) shall be publicly disclosed to ensure transparency and in full compliance with Eldorado's Anti – Bribery and Anti – Corruption policy.
- iv. For Community Investment actions requests with estimated budget **over € 1.000.000**, responsible for the review and the decision of approval are the members of the Hellas Gold Board of Directors, at the recommendation of Hellas Gold CSR Committee and the Eldorado Gold Sustainability Director.

Any financial, in-kind, or logistical support provided by Eldorado Gold to public security forces shall be approved by the Corporate Legal and Compliance Department prior to execution and documented in detail describing the nature of the support and reason to provide the support.

It is underlined that the **financing of political parties or party coalitions by legal persons under public or private law is prohibited** (Article 7(6) of Law 3023/2002, as amended).

A decision for the approval of a Community Investment action does not need to be unanimous to be effective. A majority (4/6 or 3/4 recommendations accordingly) should suffice so that the action is either approved or rejected. However, no action can be approved and implemented without the consent of the Eldorado Gold Vice President, Commercial, Growth and External Relations Greece.

The CSR Committee shall perform one (1) web-meeting per month in order to review and approve the incoming requests, ensuring the effective implementation of the Community Investment actions in a timely manner. However, in case CSR Committee members cannot participate in full to the monthly meetings, the review and approval/ rejection loop can be performed via e-mail correspondence on an ad-hoc basis.

Approved requests are assigned project number which consists of **9 digits**:

- [xxx] Location/ Community Abbreviation.
- [xx] Folder Number (No.).
- [xxxx] Engagement Year.

#### *1.4.2.3 Communication of the Decision*

The approval or rejection of each request is communicated on behalf of Hellas Gold by the CSR Supervisor or the Eldorado Gold Head of Sustainability Greece to the requestor through an official response via e-mail.

#### *1.4.2.4 Legal and Financial Screening*

After the approval and before the official request acceptance by Hellas Gold, legal control of the beneficiary/-ies of the request is carried out to verify the authenticity of the provided data. The legal documents of the requestor and the legal type of contract to be formed are controlled and verified.

For this purpose, the CSR & Social Performance Department will seek and obtain the respective documents to ascertain the compliance of the request with Eldorado Gold Corporation (EG) **Code of Ethics and Anti-Corruption Policy** as well as domestic and European legislation.

Documents and evidence necessary for the compliance verification of the requestor's organization include:

- Official letter of constitution/ articles of association.
- Identity of the Board of Directors.
- List of active organizational members (optionally).
- Criminal record (optionally).
- Tax and insurance clearance documents.
- IBAN and details of the bank account holder (in case of cash donation or sponsorship).
- Proof of registration in tax authorities.
- Other tax documents.

Hellas Gold Legal and Finance Departments are responsible for reviewing evidence and providing written clearance by e-mail to the responsible CSR Officer to proceed with the Community Investment action.

#### 1.4.2.5 Official Request Acceptance

After the approval of a request by the CSR Committee and the positive Legal and Financial control, the Department communicates to the stakeholder an official protocolled “**Letter of Acceptance**” (by the Protocol Officer) of the Cassandra Mines.

On the other side, the requestor must confirm officially in written format the acceptance of the CSR action. The official response, with the “**Beneficiary Acceptance Decision Document**”, by the requestor must take place within thirty (30) days upon signature of the “Letter of Acceptance”.

#### 1.4.2.6 Implementation Process

Once a Community Investment action is approved, the CSR Officers are responsible for monitoring its implementation. The CSR Supervisor will inform the Eldorado Gold Head of Sustainability Greece about any potential deviations or technical issues that may arise.

Indicatively, below are provided some projected **timeframes for the implementation** of each form of CSR contribution<sup>3</sup> type:

- **In-Kind Contribution:** 5-12 weeks from contract signing depending on the form of the contribution and the respective process.
- **Technical activities:** 4-8 months. The time plan for technical activities may be adjusted based on the needs and the specifications of each project.
- **Cash Donation:** 6 weeks
- **Sponsorship:** 6 weeks
- **Stock Donation/ OpEx Services:** 3-6 weeks
- **Local Development Actions:** 3-6 months. The consultation with the stakeholders of such actions can be a long-term ongoing process aiming at maximizing the scope and expanding the scale of the positive impact.
- **Volunteering/ Humanitarian initiative:** Up to 1 and/or 2 weeks (depending on the type/ nature of the initiative).

#### 1.4.3 Contracting and Procurement

To initiate any Community Investment action, a contract binding Hellas Gold and the requestor is required, with limited exceptions. The CSR & Social Performance Department is responsible for drafting the contract detailing the purpose of the sponsorship/ donation and each party’s roles and responsibilities regarding the implementation. The draft contract is reviewed and subsequently finalized via the corporate contract tracking application prior to signature by both parties. All CSR related contracts are registered in the relevant software (SAP) aiming at efficient monitoring, tracking and management of the bilateral agreement.

Following the development of the contract, a robust two-level management system has been developed:

- i. Initial contract screening through a contract tracking tool (Power App).
- ii. Contract management system within SAP software for the monitoring of tax-related details and legal validity.

When applicable the contract may call for a supplier selection process (Request for Proposals, RfP)

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<sup>3</sup> Ad-hoc Request Activities usually are executed immediately, although the timeframe is dependent on the nature of the request.

in accordance with Hellas Gold Procurement Policy. Specific procedures must be adhered to under the following circumstances<sup>4</sup>:

**i. In-Kind Contribution**

Community Investment action request and the respective protocol number must be registered with the material group “170190”. This is necessary so that the responsibility for the purchase of the goods and delivery to the requestor is undertaken by the Procurement Department. Upon completion, a delivery and acceptance letter (by the requestor) are signed and registered to the project’s records.

The invoice/s for the purchase is issued on behalf of Hellas Gold and is registered and paid after all correspondence and contracts are attached in SAP. The CSR & Social Performance Department confirms the Community Investment action approval and directs the supplier to issue invoice/s with a project order number included. The Eldorado Gold Head of Sustainability Greece and the Hellas Gold CSR supervisor must sign the received invoices prior the processing of the payment by the Finance Department.

**ii. Cash Donations and Sponsorships**

In cases of cash donations and sponsorships an in advance payment request against an approved project order is made via SAP and a “Thank You” letter mentioning the exact amount is sent to Hellas Gold by the requestor. Cash donations and sponsorships must be registered with the material group “170190”.

**iii. Donations according to article 3A of L4182/2013 (as in force)**

Article 3A of L4182/2013 as it has been added with Article 55 of L. 4557/2018 (Government Gazette 139/A/20.07.2018) provides a special type of donation (in kind, services or technical works) to a Public Entity according to a special procedure. In this case of article 3A, the Public Entity/requestor undertakes a tender process and selects a supplier after receiving at least three (3) offers. If estimated costs **exceed € 10.000**, Hellas Gold may invite a representative to consult on the tender process (as 3A provides). A contract between Hellas Gold and the requestor is signed followed by a contract between the requestor and the winner of a bidding process that is carried out by the requestor. Hellas Gold will pay directly the winner of the bidding process once his supply, services of technical work is completed, upon respective request by the requestor. The invoices of the supplier are issued in the name of the requestor with a special note that the payment will be made by Hellas Gold according to article 3A.

SAP material group “170191” is used in the case of 3A in-kind donations and sponsorships where the donee is governmental body and the transaction considered ESTMA reportable for our mother company Eldorado Gold.

All contracts related to the donation or sponsorship are uploaded to SAP. Hellas Gold pays the invoice which is issued with the requestor’s details along with a written confirmation that the invoice will be paid by Hellas Gold as an outcome of the signed contracts and the Paragraph 3A L. 4182/2013. A receipt document is provided and registered following the payment.

**iv. Donations and Sponsorships for Technical Works/ Infrastructure Community Investment Actions**

For all civil technical works/ infrastructure Community Investment actions to which Hellas Gold has made a donation, a permanent logo plaque should be displayed near or on the respective infrastructure highlighting that the project was completed with the contribution of Hellas Gold. This shall be included as a term in the contract for such donations and sponsorships.

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<sup>4</sup> For Stock Donation/ OpEx Service actions and Corporate Volunteer/ Humanitarian Initiatives, no procurement processes are involved.

Form the approval and during execution of infrastructure, civil engineering/ technical works financed totally or partially by Hellas Gold, the Studies and Permits Department or an internal PMO or an EPC shall inspect the budget and technical descriptions or relevant studies as well as the works conducted till completion and issue a technical report regarding the acceptance of the completed work.

Hellas Gold shall maximize leverage of Community Investment actions to enhance community engagement, recognition, and positive publicity. Use of Hellas Gold logo, logo plaques, official letter of appreciation by the organization, and/ or other forms of publicity shall be requested for every Community Investment sponsorship.

It is noted that **the requestor should sign the contract within 30 days since the receipt of the “Letter of Acceptance”** by Hellas Gold of the Community Investment action.

#### **v. Urgent Community Investment Action Requests**

Regarding requests that are excluded from the general conditions described in this procedure and in the CDP and CIP, e.g., ad hoc requests resulting from emergency conditions, a special purchase order is created in the SAP system which contains the word "Urgent or URG" in the description.

In this way, the immediate detection within the SAP system of such actions is possible, helping to achieve faster implementation. Additionally, the extraction of the relevant information from the system is easier, so that these they can be used for any further processing.

#### **1.4.4 Monitoring of Execution**

The CSR Supervisor is responsible for monitoring the execution and successful completion of each approved Community Investment action request. Each CSR Officer is accountable for monitoring the implementation and progress of the approved Community Investment action through appropriate mechanisms such as site visits (if needed), review meetings and progress reports etc. The Community Investment actions are also evaluated against the milestones defined in the implementation plan of the action. Once completed, the actual versus the expected output and impact of action is evaluated and reported based on the criteria described in the implementation plan.

The responsible CSR Officer prepares the evaluation report of each Community Investment action which includes evidence relevant to the successful completion of the action (i.e., photos, technical report, etc.). The evaluation report is reviewed by the CSR Supervisor. At the end of each year, the Community Investment actions evaluation reports are consolidated into a comprehensive Annual Community Investment Actions evaluation report that is maintained in the CSR & Social Performance Department digital archives and is duly communicated to the Hellas Gold and Eldorado Gold Corporation Leadership Teams, by the end of Q1 of the subsequent year (t+1).

#### **1.4.5 Completion**

After the completion of a Community Investment action, the **“Delivery Protocol”**, declaring the details of the completion of the action, is sent to the respective stakeholder. The stakeholder must also reply officially in written format and accept the donation. On several occasions, depending on the nature of the Community Investment action a delivery ceremony may take place with the physical presence of the responsible CLO and/ or CSR Officer.

#### **1.4.6 Reporting**

The CSR & Social Performance Department is responsible for preparing the internal and external reports to ensure the transparency and efficiency of the implementation process of the Community Investment actions.

#### 1.4.6.1 Internal Reporting

##### **i. Quarterly report**

Prepared by the CSR Officers in cooperation with CLOs, reviewed by CSR Supervisor, submitted to Eldorado Gold Head of Sustainability Greece, and delivered to Eldorado Gold Corporation, including the following information:

- Significant stakeholder engagements that took place during the respective quarter of each year (e.g., meetings with stakeholders).
- Material community, human rights, consultation or other external initiatives (e.g., stakeholder mapping exercises, new CSR engagement initiatives, significant communications etc.).
- Other relevant information to be communicated to corporate Management and the Sustainability Committee of Eldorado Gold Corporation including follow up from incidents reported in the previous quarter, or additional information in support of the Health, Safety and Environment (HSE) incidents.

##### **ii. Annual Community Investment actions summary report**

Prepared by the CSR Officers and CLOs, reviewed by CSR Supervisor, submitted to Eldorado Gold Head of Sustainability Greece, and presented to the Hellas Gold Management, including the following information:

- The progress status of Community Investment actions (completed/in progress).
- The actions categories.
- Location and communities.
- Initial estimated budget and final spent.
- Any important issues/ lessons learned during the Community Investment action implementation process.

##### **iii. Social impact assessment report**

Upon the completion of the Community Investment actions, the CSR Officers prepare an impact assessment analysis (in excel spreadsheet format) to evaluate the social impact of the completed Community Investment actions on an annual basis. This report is reviewed by the CSR Supervisor and submitted to the Eldorado Gold Head of Sustainability Greece. The findings of this report can be integrated in the annual Community Investment actions summary report.

##### **iv. Benchmarking report**

On an annual basis the CSR Officers prepare a benchmarking report, aiming to compare and assess Hellas Gold's community investments against mining industry key actors as well as against other companies with leading Community Investment programs. This report is reviewed by the CSR Supervisor, and it is then submitted to the Eldorado Gold Head of Sustainability Greece. Key components of the report include:

- a. Comparative Analysis
- b. Best Practices Identification
- c. Mining Royalties to the Greek Government and
- d. Recommendations.



### 1.4.6.2 External Reporting

The CSR & Social Performance Department is responsible for preparing and publishing the quarterly Social Performance Report, available in Hellas Gold's website (<https://www.hellas-gold.com/viwsimothta/etairiki-koinoniki-efthygni/apologismos-kai-ektheseis>) and shared with the CiC as well.

An annual CSR/ Sustainability (leaflet) report with the goal of sharing Hellas Gold corporate responsibility efforts, performance, and results. More specifically, the report aims to communicate Hellas Gold commitment to being socially responsible and in addition promotes transparency amongst stakeholders. Through this report, our Company measures the impact and progress resulting from Community Investment initiatives, as described in the next section. The report can serve as a guiding tool both short and long-term decisions and allows Hellas Gold for readjustments if necessary.

The annual Eldorado Gold Sustainability report incorporates relevant sustainability qualitative and quantitative information regarding the Greek operations and projects.

### 1.4.7 Performance Monitoring

#### 1.4.7.1 KPIs for Performance Monitoring

The CSR & Social Performance Department measures and monitors its performance through specific KPIs to ensure transparency and efficiency of the Community Investment actions/ initiatives implementation process and mitigate any risks inherent with the process. At the highest level, such measurements allow Hellas Gold to make better decisions regarding which Community Investment and social programs to support, enhance the efficiency of the Community Investment initiatives, and engage stakeholders (and shareholders) in the work.

The KPIs include:

- ✓ Amount of community investments per Pillar-Objective.
- ✓ Amount of community investments per Location.
- ✓ Number of Community Investment actions per Location.
- ✓ Number of Community Investment actions per Pillar.
- ✓ Beneficiary Types.
- ✓ Deviation from budgeted spending.
- ✓ Completion of actions and budgets in a timely manner; No. of completed and in progress actions.
- ✓ Breakdown of Completed Actions by Impact Category (People, Community, Environment).
- ✓ Percentage of completed actions per Contribution Lever (Community investment, Charitable aid, Strategic initiative).
- ✓ Number of Suppliers Reached per Location Level.
- ✓ Expenses to local suppliers.
- ✓ Local employment.
- ✓ Number of engagement activities with local communities and key stakeholders.
- ✓ Number of volunteering activities.
- ✓ Percentage of incoming requests properly logged and responded.

- ✓ Percentage of implemented actions gaining CSR committee approval.
- ✓ No. of employee training programs.
- ✓ Geographical distribution of the total Community Investment budget spent.
- ✓ No.
- ✓ Media coverage.
- ✓ Additional KPIs which may derive from the implementation of the SIMS by our company.

#### 1.4.7.2 CSR Performance Ratings

Measuring and comparing Hellas Gold's CSR performance both internally between departments and externally with other organizations is crucial. To achieve this, external ratings or third-party "risk scores" may be utilized, particularly for the Environmental, Social, and Governance (ESG) aspects of CSR. These ratings can also be used by investors to evaluate the company's initiatives. Indicative indexes that Hellas Gold can choose to benchmark its CSR performance include:

- ✓ **Dow Jones Sustainability index:** The Dow Jones Sustainability Indices are a family of indices evaluating the sustainability performance of thousands of companies trading publicly, operated under a strategic partnership between S&P Dow Jones Indices and RobecoSAM.
- ✓ **Financial Times Stocks Exchange - FTSE4Good:** The FTSE4Good Index Series measures the performance of companies demonstrating strong Environmental, Social and Governance (ESG) practices.
- ✓ **Morgan Stanley Capital International (MSCI)** – Assesses companies' ESG performance and facilitates decision making in the investment community.
- ✓ **Carbon Disclosure Project (CDP)** – CDP is the leading environmental disclosure organisation for companies and cities.
- ✓ **EcoVadis:** EcoVadis Ratings are evidence-based and adapted to more than 200 industry categories, 160 countries and companies of all sizes. They cover four sustainability themes: Environment, Labor and Human Rights, Ethics and Sustainable Procurement.
- ✓ **Institutional Shareholder Services group - Environmental Social Governance (ISS ESG):** ISS, along with Genstar Capital and ISS management, is a leading provider of corporate governance and responsible investment solutions, market intelligence, fund services, and events and editorial content for institutional investors and corporations, globally. Clients include many of the world's leading institutional investors who rely on ISS' objective and impartial offerings, as well as public companies focused on ESG and governance risk mitigation as a shareholder value enhancing measure.
- ✓ **Vigeo-Eiris:** It is part of Moody's ESG Solutions. Moody's ESG Solutions is a business unit of Moody's Corporation that serves the growing global demand for ESG and climate insights. The group's comprehensive offering includes ESG scores, climate data, Sustainability Ratings and Sustainable Finance certifier.

## 2. RACI Matrix

**Table 2** below provides an overview of who is **Responsible (R)** and **Accountable (A)** for each development, implementation and reporting activity of the CSR and Social Performance Department as well as who should be **consulted (B)** and **informed (I)** throughout for each associated activity.

Table 2: Hellas Gold CSR & Social Performance Department processes and associated Roles and Responsibilities.

CSR Processes	Eldorado Gold Vice President, Commercial, Growth and External Relations Greece	CFO	General Executive Director	CSR Committee	Legal and Finance Departments	Procurement Department	Eldorado Gold Head of Sustainability Greece	CSR Supervisor	CSR Officers I & II	CLO I & II and GO
Identification & Categorization of CSR activities							A	R	C	C
Long - Term Plan	A	I	A				R			
Annual Planning	A	I	A				R	C		
Budget Preparation & Approval	A		A				R	C		
Monitoring of Plan Execution							I	A	R	

CSR Processes	Eldorado Gold Vice President, Commercial, Growth and External Relations Greece	CFO	General Executive Director	CSR Committee	Legal and Finance Departments	Procurement Department	Eldorado Gold Head of Sustainability Greece	CSR Supervisor	CSR Officers I & II	CLO I & II and GO
Management of Local, Regional, and National requests							I	A	R	I
Evaluation and Approval	A	I	A	R	A			I	I	I
Implementation Plan					C		C	A	R	I
Contracting and Procurement						A		R	R	I
Monitoring of Execution								R	A	

CSR Processes	Eldorado Gold Vice President, Commercial, Growth and External Relations Greece	CFO	General Executive Director	CSR Committee	Legal and Finance Departments	Procurement Department	Eldorado Gold Head of Sustainability Greece	CSR Supervisor	CSR Officers I & II	CLO I & II and GO
Completion								I	R	R
Reporting	I	I	I				C	A	R	R
Performance Monitoring and Benchmarking Ratings	I		I				A	A	R	R

**Legend:**

<b>R – Responsible:</b>	Those who do the work to complete a task.
<b>A – Accountable:</b>	The one who validates the correct and thorough completion of a task, also ensures that the prerequisites of a task are met and delegates the work to those responsible. The accountable who approves the work that the responsible provides.
<b>C- Consulted:</b>	Those whose opinions are sought, typically subject-matter experts with whom there is two-way communication
<b>I – Informed:</b>	Those who are kept up to date on progress of the task and with whom there is just one-way communication

## Appendix I

### Our CSR & Social Performance Dissemination Process

Our CSR & Social Performance Department, in collaboration with the Communications Department support open dialogue with the community, the beneficiaries and all stakeholders, by establishing dissemination mechanisms for sharing information related to Corporate Social Responsibility (CSR) and Social Performance. All publications and communication activities should be in alignment with: i) the Eldorado Gold Disclosure Policy, ii) the Hellas Gold Communications Policy, iii) the Hellas Gold Media Policy, iv) the Hellas Gold Social Media Policy, along with the applicable legislation governing the disclosure of information.

#### I. Communications Department

The primary responsibility of the department is to develop concise content, with regards to Hellas Gold's Community Investment activities and to distribute information across various communication channels, ensuring a consistent and cohesive representation of the company's CSR initiatives. To establish an effective communication methodology and ensure the precision of disseminated information, the Communications Department collaborates with the Hellas Gold CSR & Social Performance Department to collect, validate, and consolidate CSR data and achievements. Moreover, the identification of key stakeholders and the customization of communication approaches to address specific requirements and concerns are integral components of the Communications Department's operational framework. In addition, the Communications Department undertakes the responsibility of establishing and sustaining connections with media, non-governmental organizations (NGOs), community representatives and other significant entities.

The Communication Department team performs a weekly meeting with the CSR & Social Performance Department to align on the specifics of the advertised Community Investment actions. In the meetings certain actions are analyzed in detail taking into consideration the respective CSR pillars and strategic objectives of Hellas Gold.

#### II. Communication Channels and Actions

Hellas Gold utilizes a comprehensive methodology in disseminating corporate social responsibility (CSR) initiatives, incorporating a diverse range of platforms to effectively engage with the community and all involved stakeholders. The established communication channels are:

❖ **Press**

Engagement with newspapers, magazines, and other printed or electronic media to share Hellas Gold's Community Investment actions and achievements, through sponsored content, advertising listings, sending and publishing of Press Releases, etc.

❖ **Digital Publications**

Online articles that provide insights and accomplishment with regards to corporate Community Investment activities.

❖ **Local Media**

Publication of sponsored content in local press or online media, to enhance local community awareness and information.

**❖ Corporate reports**

*Sustainability report:* Presenting achievements and KPIs related with Hellas Gold's performance within the reporting period.

*Quarterly Social Performance Report:* Presenting community investments and initiatives, along with quantitative and qualitative data related to Community Investment actions within the reporting 3-month period (Amount of community investments, Spending to local suppliers, Impact of Community Investment actions etc.).

**❖ Social Media Posts**

Publishing of posts, updates, articles and multimedia content highlighting selected Community Investment initiatives, via *Facebook, Twitter (X) and LinkedIn*. The information shared includes details on the extent of value distributed, the number of beneficiaries, the geographical coverage, and the significance of positive impacts.

**❖ 3rd Party Social Media (other companies, organizations or mass media)**

Engagement with organizations (i.e., NGOs) to further expand the publicity of Hellas Gold's Community Investment initiatives.

**❖ Corporate website**

*Press Room:* Publishing corporate news and announcements regarding social actions and social responsibility actions.

*Social Performance Policy:* Publishing corporate social performance commitments.

**❖ Intranet "Insight"**

Distribution of Social Performance Achievements within the internal communication platform, enhancing the employees' and internal stakeholders' awareness.

**❖ Email Campaigns**

*Internal:* Frequent newsletters and updates to all employees about ongoing and upcoming CSR projects

*External:* Direct mails to involved stakeholders, beneficiaries and the public on key Community Investment initiatives, accomplishments, and upcoming actions.

## Appendix II

### CSR Action Request Pre-Evaluation Form



#### CSR Request Pre-Evaluation Form

##### 1. Action Information

[Clear Pre-Evaluation Form](#)

Title	
Brief Description	
Requestor & Entity Name	
Stakeholder Type	Choose an item. <input type="text"/>
Request Date (DD/MM/YYYY)	
Location	Choose an item. <input type="text"/>
Community	Choose an item. <input type="text"/>
Action Category	Choose an item. <input type="text"/>
Form of CSR Contribution	Choose an item. <input type="text"/>
Estimated Budget (€)	
Documentation	Choose an item. <input type="text"/>

##### 1.1. YTD CSR Activities for the Community:

Location	Community	YTD Actions approved for the Community <sup>1</sup> (No)	YTD Budget approved for the Community <sup>1</sup> (€)
Choose an item. <input type="text"/>	Choose an item. <input type="text"/>		

##### 2. CSR Committee

Budget < € 10K	€10K < Budget < €100K	€100K < Budget > €1M	Budget > € 1M
Head of Sustainability	Committee	Committee & Sims leadership confirmation	BoD Confirmation
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

##### 3. CSR Evaluation Summary

Compliance with HG's CSR Policy & Principles	Choose an item. <input type="text"/>
CSR Officer's evaluation	Choose an item. <input type="text"/>
Contribution Lever	Choose an item. <input type="text"/>

<sup>1</sup> Includes the number of approved CSR actions of the current year, for the specific community, which have been up today completed, are in progress or ongoing. Includes also actions for which the original request was received and approved in a previous year but implementation starts in the current year.

When a CSR request derives from Aristotle M. and refers to a specific community, then the number of CSR actions and the respective budget for the entity of Aristotle M. is given (actions that were requested by Aristotle M. entity).





### 3.1 CSR Evaluation Criteria

	Sub-Criteria	Mark	Score	Comments
Alignment with Hellas Gold's strategic direction	<b>a) Is the project aligned with HG's CSR strategy principles?</b> <input type="checkbox"/> Inclusiveness <input type="checkbox"/> Participation <input type="checkbox"/> Capacity strengthening <input type="checkbox"/> Leveraging Local Existing Assets <input type="checkbox"/> Sustainability	1= 1 Principle 2= 2 Principles 3= 3 Principles 4= 4 Principles 5= 5 Principles	Choose an <input type="text"/>	
	<b>b) Does the project contribute to the achievement of the specific directions of the CSR Strategy?</b> <input type="checkbox"/> Build relationships of trust and good will to support construction and operations. <input type="checkbox"/> Generate sustainable improvements in the quality of life for local communities. <input type="checkbox"/> Support management of priority social risks in each locality and <input type="checkbox"/> Maximize return on investment through good management practice.	1= Barely 2= Partially 3= Satisfactorily 4= Extensively	Choose an <input type="text"/>	
	<b>c) Does the proposal have a strong connection with at least one of HG's CSR strategic objectives?</b> <input type="checkbox"/> Strengthen local community environmental resilience. <input type="checkbox"/> Facilitate the growth of the local economy (mining supply chain and parallel economy). <input type="checkbox"/> Contribute to developing gender equality and capacity building in local communities. <input type="checkbox"/> Facilitate access to healthcare services for vulnerable groups within local communities. <input type="checkbox"/> Promote educational opportunities for youth within the local communities.	0= No 1= Yes	Choose an <input type="text"/>	
Location	<b>a) In which community of interest will the CSR action be implemented?</b> Choose an item. <input type="text"/>	1= Area of Low Interest <sup>2</sup> 2= Area of Medium Interest <sup>3</sup> 3= Area of High Interest <sup>4</sup>	Choose an <input type="text"/>	
Community need	<b>a) Does the project support a specific local or regional Government development plan?</b>	1= Barely 2= Partially 3= Satisfactorily 4= Extensively	Choose an <input type="text"/>	
	<b>b) Is there evidence of community need and support for the project?</b>	0= No 1= Yes	Choose an <input type="text"/>	
Impact	<b>What is the anticipated impact of the project?</b>	1= Low 2= Moderate 3= High	Choose an <input type="text"/>	
Ease of implementation	<b>a) Is the project recurring / implemented in the past</b>	-1 = Yes, but not successfully implemented 0 = Not implemented before 1 = Yes, successfully implemented in the past	Choose an <input type="text"/>	
	<b>b) How demanding is this project in terms of involvement of CSR and other supporting functions?</b>	1= High Involvement 2= Moderate Involvement 3= Low Involvement	Choose an <input type="text"/>	
	<b>c) How long will it take before we start implementing this project?</b>	1= 6 Months or more 2= Between 3 and 6 months 3= Under 3 months	Choose an <input type="text"/>	
		Total score (Always update this field, by right click on the number)	0	
		Maximum possible score	28	
		Minimum passing score (60%)	18	

<sup>2</sup> Areas of low interest: Polygyros M., Regional, National

<sup>3</sup> Areas of medium interest: Stanos, Pyrgadikia, Nea Roda, Ouranoupoli, Ammouliani, Gomati, Agio

<sup>4</sup> Areas of high interest: Stratoniki, Stratoniki, Stageira, Olympiada, Palaiochori, M. Panagia, Neochori, All Aristotle M. communities, Varvara, Amaia, Ierissos, Volvi M.

CSR - Project Assessment Template



3.2 CSR Action Risk Assessment

	Sub-Criteria	Mark	Score	Comments
Social Risk Mitigation	a) Does the proposed project mitigate any social risks?	0= No 1=Yes	Choose <input type="text"/>	
	b) Should there be any risks that are mitigated, under which of the subsequent categories would these be classified? <input type="checkbox"/> Limited community resources <input type="checkbox"/> Social tension and legacy issues concerns <input type="checkbox"/> Social isolation and vulnerable social groups <input type="checkbox"/> Youth disengagement and aging population <input type="checkbox"/> Urbanization and decrease in population <input type="checkbox"/> Cultural degradation and heritage loss <input type="checkbox"/> Climate change risks <input type="checkbox"/> Absence of a post-mining economy plan or closure strategy <input type="checkbox"/> None	0= No social risks may be mitigated 1= Mitigation of 1 category 2= Mitigation of 2 categories 3= Mitigation of 3 categories 4= Mitigation of 4 categories 5= Mitigation of 5 categories 6= Mitigation of 6 categories 7= Mitigation of 7 categories 8= Mitigation of 8 categories	Choose <input type="text"/>	
Risk Occurrence for Hellas Gold	a) Are there inherent risks for Hellas Gold that may arise during the implementation of the project?	0= No -1=Yes	Choose <input type="text"/>	
	b) If there are any potential risks for Hellas Gold that may occur during the execution of the CSR action, to which of the following categories would they be related? <input checked="" type="checkbox"/> Non-viability and non-sustainability of the CSR Action <input type="checkbox"/> Delays in CSR action delivery due to prolonged permitting processes <input type="checkbox"/> Health and Safety hazards <input checked="" type="checkbox"/> Limited budget allocation and resource distribution <input type="checkbox"/> Displacement of the governmental mechanisms <input type="checkbox"/> Regulatory concerns <input checked="" type="checkbox"/> Brand reputation risks <input type="checkbox"/> Climate change risks <input type="checkbox"/> None	0= No social risks may occur -1= Occurrence of 1 category -2= Occurrence of 2 categories -3= Occurrence of 3 categories -4= Occurrence of 4 categories -5= Occurrence of 5 categories -6= Occurrence of 6 categories -7= Occurrence of 7 categories -8= Occurrence of 8 categories	Choose <input type="text"/>	
Mitigation of CSR action related risks for Hellas Gold	a) If there are any potential risks for Hellas Gold that may occur during the execution of the CSR action, which of the following mitigation measures should be taken? <input type="checkbox"/> Request for conducting a business plan and feasibility study <input checked="" type="checkbox"/> Ongoing engagement with relevant stakeholders <input type="checkbox"/> Strict adherence to Hellas Gold's policies and standards (I.e. H&S) during the construction phase <input type="checkbox"/> Resource allocation optimization for the proactive planning of a fairly distributed community investments program <input checked="" type="checkbox"/> Implementation of targeted actions over a designated period to streamline operational efficiency and support the establishment of public structures/ services <input type="checkbox"/> Engagement of subject matter experts to ensure adherence to all pertinent regulations <input type="checkbox"/> Adoption of efficient implementation procedures in accordance with environmental standards, based on circular economy principles <input checked="" type="checkbox"/> Other action-specific mitigation measures:  <div style="border: 1px solid black; padding: 5px; min-height: 40px;">                         Please provide relevant information (if applicable)                     </div>			
		Total score (Always update this field, by right click on the number)	0	
		Maximum possible score	9	
		Minimum possible score	-9	
		Minimum passing score	0	

<b>Evaluator</b>	<b>Approver</b>
Name Choose an iter <input type="text"/>	Name Choose an iter <input type="text"/>
Signature	Signature
Date Click or tap to enter a date.	Date Click or tap to enter a date.

#### 4. Appendix I

##### Clarifications on social risks categories:

<b>Limited community resources:</b>	Limitations in terms of resources and infrastructure that can be utilized for individual and societal development.
<b>Social tension:</b>	Limited social cohesion and public consensus.
<b>Social isolation:</b>	Exclusion and isolation of vulnerable social groups.
<b>Youth disengagement and aging population:</b>	Diminishing population of young citizens due to the lack of active participation in the economic and social activities of the local communities, leading to an increase in the region's average population age.
<b>Urbanization and decrease in population:</b>	Intense urbanization and reduction of the permanent resident's population.
<b>Cultural degradation and heritage loss:</b>	Gradual loss of distinct cultural characteristics, traditions, and practices among local communities as time progresses.
<b>Climate change risks:</b>	Occurrence of significant threats to the environment, natural systems and society, due to increasing concentrations of greenhouse gases, primarily from inefficient production, manufacturing, and transportation practices. Consequences of climate change include floods, extreme temperatures and prolonged droughts, along with infrastructural damage, economic impact and ecosystem disruptions.
<b>Absence of a post-mining plan or closure strategy:</b>	Lack of a comprehensive and structured approach to manage the environmental, social, and economic challenges that arise after the mining operation has been completed.

## Appendix III

### Personal Data Protection Notice

**NOTICE CONCERNING THE PROCESSING OF PERSONAL DATA BY THE COMPANY "HELLAS GOLD SINGLE MEMBER S.A." IN THE CONTEXT OF THE UNDERTAKING AND IMPLEMENTING CORPORATE SOCIAL RESPONSIBILITY ACTIVIONS.**

**Société Anonyme under the name "HELLAS GOLD Single Member Société Anonyme Mining Company and Gold Industry"** considers the issues of personal data protection and privacy to be of paramount importance and manages them responsibly.

To this end, this Information Notice has been prepared in accordance with **Articles 13 and 14 of the General Data Protection Regulation (EU 2016/679, "GDPR")**, in order to provide information on the processing of personal data that takes place in the context of **undertaking and implementing Corporate Social Responsibility (CSR) actions**.

#### I. Responsible for Data Processing

Responsible for Data Processing for any processing of personal data that takes place in the context of undertaking and implementing Community Investment actions is the **Société Anonyme under the name "HELLAS GOLD Single Member Société Anonyme Mining Company and Gold Industry"** with the distinctive title **"HELLAS GOLD Single Member S.A."** headquartered in Athens, 23A, Vasilissis Sofias Avenue and number 23A, P.O. Box 10674, with Tax Identification Number 999642840, D.O.Y. Athens Tax Office (hereinafter referred to as the "Company").

#### II. Data Sources

The data processed by the Company derive from:

- a. The persons themselves (natural/ legal persons) or entities requesting their financial support - financing of their actions.
- b. Entities (indicatively: local government bodies, associations and associations of persons) or natural persons who indicate the need for financial support - financing the actions of another person or entity.

#### III. Collected Data and Processing Purposes

The following **Tables B1 and B2** summarise the personal data processing purposes and present the respective legal bases, data subject categories and the personal data processed:

**Table B 1:** Characteristics of the data processing in the case that the data originate from persons or entities (**Above under II, a**).

No.	Purpose for Data Processing	Subject Categories	Personal Data Categories	Legal Basis
1.	<p>Management evaluation</p> <p>of requests regarding undertaking CSR activities.</p>	<p><b>A. <u>The requestor is a legal person or entity:</u></b></p> <p>Contact person.</p> <p><b>B. <u>The requestor is a natural person:</u></b></p> <p>The requestor.</p>	<p>For contact persons of legal persons or entities (<b>Subject category A</b>):</p> <ol style="list-style-type: none"> <li>a. Name and Surname.</li> <li>b. Contact data.</li> </ol> <p>For natural persons - requestors (<b>Subject category B</b>):</p> <ol style="list-style-type: none"> <li>a. Name and Surname.</li> <li>b. Contact data.</li> <li>c. Any other data that they might include by their own will to the request.</li> </ol>	<p>Taking measures at the request of the Subject prior to the conclusion of the contract (Art. 6(1)(b)(b) GDPR).</p> <p>In the case that the request is submitted by a natural person and involves special categories of data, the processing concerns personal data which have been manifestly made public by the data Subject (Art. 9(2)(e) GDPR).</p>
2.	<p>Conclusion of donation contract.</p>	<p><b>A. <u>The requestor is a legal person or entity:</u></b></p> <p>Legal representatives.</p> <p><b>B. <u>The requestor is a natural person:</u></b></p> <p>The requestor.</p>	<p>For legal representatives of legal persons or entities (<b>Subject category A</b>):</p> <ol style="list-style-type: none"> <li>a. Identification or Passport data.</li> <li>b. Contact data.</li> <li>c. Any other personal data contained in the certificates of representation and/ or in other legal documents.</li> </ol> <p>For natural persons applicants (<b>Subject category B</b>):</p> <ol style="list-style-type: none"> <li>a. Identification or Passport data.</li> <li>b. Contact data.</li> <li>c. Tax Identification Number.</li> </ol>	<p>The data are necessary for the conclusion of a contract (Article 6(1)(b)(a) GDPR).</p>

**Table B 2:** Characteristics of the processing in cases where the data originate from third parties or persons (**Above under II, b**).

No.	Purpose for Data Processing	Subject Categories	Personal Data Categories	Legal Basis
1.	Management - evaluation of requests regarding undertaking CSR activities.	<p><b>A.</b> Contact person of the entity or natural person submitting the request for financial support - funding of actions of another person.</p> <p><b>B.</b> Natural person to whom the request relates.</p>	<p>For contact persons (<b>Subject category A</b>):</p> <ul style="list-style-type: none"> <li>a. Name and Surname.</li> <li>b. Contact data.</li> </ul> <p>For natural person to whom the request relates (<b>Subject category B</b>):</p> <ul style="list-style-type: none"> <li>a. Name and Surname.</li> <li>b. Contact data.</li> <li>c. Any other data included in the request for its substantiation.</li> </ul>	Consent (Articles 6(1)(a) and 9(2)(a) of the GDPR).
2.	Conclusion of donation contract.	<p><b>A.</b> <u>The financial assistance - financing is provided to a legal person or entity:</u></p> <p>Legal representatives.</p> <p><b>B.</b> <u>The financial assistance is provided to a natural person:</u></p> <p>The natural person.</p>	<p>For legal representatives of legal persons or entities (<b>Subject category A</b>):</p> <ul style="list-style-type: none"> <li>a. Identification or Passport data.</li> <li>b. Contact data.</li> <li>c. Any other personal data contained in certificates of representation and/ or other legal documents.</li> </ul> <p>For natural persons (<b>Subject category B</b>):</p> <ul style="list-style-type: none"> <li>a. Identification or Passport data.</li> <li>b. Contact data.</li> <li>c. Tax Identification Number.</li> </ul>	The data are necessary for the conclusion of a contract (Article 6(1)(b)(a) GDPR).

## IV. Data Recipients

The above-mentioned personal data are processed by authorized personnel in accordance with the Company's Policies and Procedures and are not disclosed to third parties.

In the case that financial support is provided – financing of actions, the data collected when the relevant contract is concluded is transferred to Eldorado Gold in Canada on the basis of a relevant adequacy decision of the Commission (Art. 45 GDPR).

## V. Record Keeping Time

The personal data processed in the context of undertaking CSR activities by the Company are kept only for the strictly necessary period of time. In particular, the data included in requests that are not approved, are deleted within one month of the relevant decision. Data included in requests that are approved shall be retained in accordance with the terms of the contract concluded.

## VI. Your Rights and the Exercise of Your Rights

Below are presented the rights of the Subjects in relation to their personal data. The Company ensures the uninterrupted exercise of your rights:

1. The right to information.
2. The right of access.
3. The right to rectification.
4. The right of deletion.
5. The right to restriction of processing.
6. The right to data portability.

For more information about your rights, please refer to the Company's Privacy Policy, which is posted on [our Corporate Webpage](#).

## VII. Consent Withdrawal

We inform you of your right to withdraw your consent at any time, without affecting the lawfulness of the processing based on the consent before its withdrawal, by contacting the Company's Data Protection Officer at the e-mail address:

- E-mail: [GR-privacy@eldoradogold.com](mailto:GR-privacy@eldoradogold.com)

To be informed on any matter concerning the processing of personal data and to exercise your rights in accordance with the applicable Greek and European legislation, you can contact:

- Postal Address: 23A Vasilissis Sofias Avenue, Athens 10674
- E-mail: [GR-privacy@eldoradogold.com](mailto:GR-privacy@eldoradogold.com)

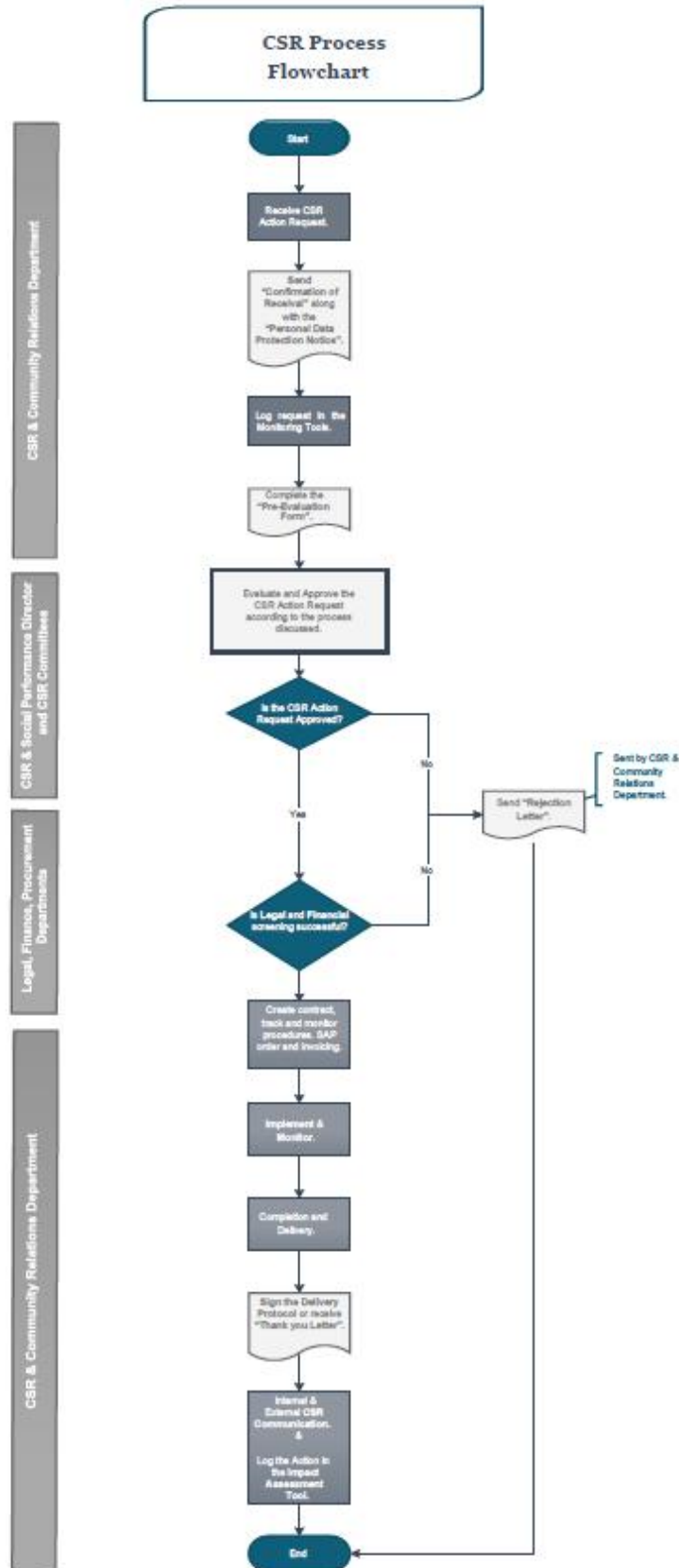
For additional information about your rights, please refer to the **Company's Privacy Policy**, which is posted on [our Corporate Webpage](#).

## VIII. Submission of a Complaint

Data Subjects always reserve the right to address the Data Protection Authority (DPA), which may accept the submission of relevant complaints either in written format or electronically by following the relevant instructions in the [webpage](#) after first contacting the Responsible for Data Processing as described above.



## Appendix IV



## Document Control

This management plan, along with all records of updates, audits, inspections and monitoring results, will be managed in accordance with the Hellas Gold ISO-certified IEMS document management system.

### Document Control

<b>File Name</b>	<b>Corporate Social Responsibility – Process Manual</b>
Document Number	
Approval Date	
Version Number	03