



eldorado gold

Eldorado Gold

Non-Use of Alcohol or Psychotropic Addictive Substances Control Policy

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I. Introduction

Eldorado Gold Corporation ("Eldorado") is committed to integrating sustainability into every aspect of its operations as outlined in the Company's Sustainability Framework.

Our Company aims to provide a safe and healthy workplace and we are committed to providing the guidance and resources to manage health and safety risks. Ensuring health and safety in all our operations adds value to our workforce, fosters a sense of integrity, prevents harmful effects on the health of people and the local community, whilst promoting the success of our organization. As part of our pursuit of safe and healthy operations, we are committed to preventing injuries and illnesses to our employees and associates by implementing measures to eliminate and reduce hazards at every stage of our business.

II. Purpose

The purpose of this Non-Use of Alcohol or Psychotropic Addictive Substances Control Policy is to set out Eldorado's commitments for the implementation of the Mining and Quarrying Regulation as in force and published (YA D7/A/oik.12050/2223, Government Gazette, B' 1227/2011). According to Article 5A par. 2(j) of the same: "The consumption of alcoholic beverages before and during work and the use of medicines without a prescription is prohibited.

III. Scope

Our Non-Use of Alcohol or Psychotropic Addictive Substances Policy and its management approach are based on the following international and national frameworks:

- The International Cyanide Management Code
- The International Labour Organisation (ILO) International Labour Standards for Occupational Safety and Health (ILO)
- *Health and Safety Protocol* of the Mining Association of Canada's "Towards Sustainable Mining" initiative
- Responsible Gold Mining Principles of World Gold Council
- Greek Mine and Quarry Regulation

The Company's Non-Use of Alcohol or Psychotropic Addictive Substances Control Policy and its implementation comply and are updated in accordance with the Occupational Health and Safety Management and Road Safety Management Systems standards ISO:45001 and ISO:39001.

Our Sustainability Integrated Management System (SIMS) establishes sustainability requirements at the corporate level, which are harmonized with the aforementioned international

and national frameworks, in order to ensure their consistent application and compliance across our operations, as well as optimal performance in the area of Health and Safety. The Company expects all employees and associates to comply with this Non-Use of Alcohol or Psychotropic Addictive Substances Control Policy and the relevant SIMS requirements.

Eldorado is committed:

To subject its employees to periodic and special emergency medical examinations, without the need for prior notice, and particularly in cases of "reasonable cause" (e.g., irrational or unusual behavior, specific and clear evidence of drug or alcohol use, etc.).

1. Causes of control

α. medical examinations carried out before taking up duty and before returning to work after a positive result of a test, as well as periodic preventive medical examinations.

β. immediately after the occurrence of incidents which caused or could have caused injury or damage or accidents at work.

γ. once "reasonable cause" is established due to:

- unreasonable or unusual behaviour
- the employee's coming to work in a state of obvious incapacity to perform duties
- specific and clear evidence of the use of psychotropic substances, addictive substances or alcohol detected in appearance, behaviour, speech or breathing
- repeated and unusual tardiness to work or unjustified absences

The list of items in Appendix A facilitates the determination of "reasonable cause".

2. Conditions for conducting control/ sampling

Control/ sampling shall be carried out, as a minimum, for any use of:

- alcohol
- psychotropic, addictive substances

Sampling and control of substance use is carried out in accordance with national specifications, articles 38, 40 and 48 of the Internal Regulations of Hellas Gold S.A. and article 5-A.2(j) of Greek Mine and Quarry Regulation.

3. Control procedure until the final result is issued

Part of the checks are carried out in the medical departments of Hellas Gold S.A. (alcohol testing is carried out exclusively within the Company) and is performed by fully trained nursing staff under the supervision of the Occupational Physician.

The screening process is described in detail in the Company's "Screening Procedure for Alcohol and Psychotropic, Addictive Drug Use" which supplements this policy.

A member of the Company's staff who has tested positive for the presence of psychotropic substances, addictive substances and/or alcohol in excess of the permissible limits (as listed below) is not allowed to return or continue working. In this case:

- No continuation of work is allowed
- He/She is accompanied to his/her residence without being allowed to drive
- The reason for not working shall be recorded and the relevant information shall be entered in the worker's personal file

In addition, especially in the case of the use of psychotropic substances, addictive substances

- The employee's sample with a positive result is sent immediately to a specialized Diagnostic Laboratory in Thessaloniki or to another nearest Health Unit (Structure) for toxicological analysis.
- Pending the result of the second check on the sample, the worker shall continue to be absent from work.
- If the result of the second check of the sample is negative, the employee's obligation to abstain from work ceases to apply.
- If the result is positive, the employee continues to abstain from work and the company takes the measures listed below in tables A and B respectively for the use of alcohol and psychotropic addictive substances.

In the case of an employee whose test results were positive due to taking prescription medication, the Company's Occupational Physician is responsible to determine whether the employee is fit for work, given the use of the specific medication, or possibly decide that he/she should not work while taking the medication and issue the relevant individual fit to duty (FTD).

In such cases, the Company's Occupational Physician may request the opinion of a medical specialist.

If an employee of the Company refuses to be tested for the use of alcohol or other psychotropic, addictive substances:

- he/she is accompanied to his/her residence without driving a vehicle (company or private) where there is "reasonable cause" to suspect the person's incapacity/ capacity
- an immediate suspension of payment of wages is imposed on the worker concerned until the worker's return to work or the termination of his contract of employment, if any

- the reason for the suspension of remuneration shall be recorded and entered in the worker's personal file

All of the above also applies to the employees of contractors working at the Company's premises, without prejudice to actions that fall under the employer's responsibility (e.g. restriction of payment of wages). The employer of each employee in coordination with the Company is responsible for the actions implementation. Due to the Company's equipment and organization and the qualified personnel that are continuously on the Company's premises, the Company shall assist its contractors in the procedure described in this policy. In addition, in the context of ensuring health and safety on its premises and, in general, compliance by contractor companies with their contractual obligations, including compliance with this policy, the Company's medical labor department may request the contractor company to provide it with any necessary information and/or documentation proving its compliance. Specifically, if a Company contractor employee refuses to submit to testing for the use of alcohol or other psychotropic, addictive substances, he/she will be removed, at the contractor's risk.

4. Hellas Gold events

Events where alcohol is available are not allowed to be hosted on the premises of Hellas Gold S.A. If an event of Hellas Gold S.A. takes place for its employees in a place or location where alcohol is offered outside the Company's premises, the responsibility is assumed by the person in charge of the event who assesses and controls any risk, according to the specifications of Hellas Gold S.A., namely, indicatively:

- ensure that low or zero alcohol beverages are made available, limiting the availability of beer, wine and other high alcohol content alcoholic beverages
- ensure that beverages are served with food (i.e. light protein foods)
- instructs catering staff serving drinks to cease serving anyone who is visibly under the influence
- discontinue the supply of alcoholic beverages within a reasonable time before the end of the event
- does not allow closed bottles or cans to be removed from the premises after the event has ended
- encourage employees to designate in advance a driver who will not consume alcohol to transport them on their return journey, or otherwise designate alternative means of transport
- if necessary, provide transport for their return

IV. Reporting and Support

In any case, data concerning the use of alcohol or other psychotropic, addictive substances remain strictly confidential. Only medical and nursing staff under the supervision of the Company's occupational physician, the Head of the Department where the employee works, the Manager of

the Human Resources Department, the Superintendent and the Manager of the Health & Safety Department and the Head of Operations Greece have access to this data.

Hellas Gold S.A. shall ensure that assistance is provided by qualified professionals to those employees who will turn to it in order to deal with a problem of dependence on alcohol or other psychotropic, addictive substances and shall also encourage its contractors to provide relevant support to their own personnel.

V. Governance and Accountability

The Sustainability Committee of the Board of Directors oversees the Company's policies and strategies in the areas of occupational health and safety. Ultimate responsibility for health and safety performance rests with Eldorado's President & Chief Executive Officer (CEO), while the Executive Vice President & Chief Strategy Officer and the Executive Vice President & Chief Operating Officer maintain oversight at the corporate level. Responsibility for ensuring compliance with the requirements of this Policy is assigned to the responsible General Manager of each project and function.

Each Eldorado employee is responsible and accountable for the proper observance of health and safety rules, correcting unsafe conditions and being vigilant with respect to the health and safety of their colleagues, preventing workplace hazards.

VI. Monitoring and Non-Compliance

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

For Company employees whose laboratory test results showed the presence of alcohol or other psychotropic, addictive substances, the measures indicated in tables A. and B. respectively for the use of alcohol and psychotropic addictive substances are taken.

A. Categories of psychotropic addictive substances and Measures to be taken in case of a positive result

Categories of Psychotropic/ Addictive Substances	Measures taken in case of positive result
Barbiturates	Immediate work stoppage. Initiation of disciplinary proceedings or even termination of the
Propoxyphene	
Methaqualone	
Amphetamines	

Phencyclidine	employment contract depending on the seriousness of the incident.
Methadone	
Benzodiazepine	
Opioids	
Cocaine	
Cannabis	

B. Alcohol levels and corresponding Measures to be taken in case of a positive result

Amount of alcohol (mg/L) in exhaled air	Measures Taken
0,00 - 0,25mg/L	Continuation of work if the employee is able to perform his/her duties and is certified by the occupational physician. A second relapse of the same amount will result in the initiation of formal disciplinary proceedings or even termination of the employment contract depending on the severity of the incident.
Above 0,25	Immediate work stoppage. Initiation of disciplinary proceedings or even termination of the employment contract depending on the seriousness of the incident.
Refusal to submit to an examination	Any refusal by the employee to submit will be recorded in the employee's personal file at the Human Resources Department, while the termination of the employee's employment contract is not excluded, depending on the severity of the incident.

VII. Contacts and Training

The Health and Safety Manager is responsible for establishing and maintaining this Policy. The Policy is approved by the President & CEO.



Education is a fundamental factor in the implementation of an alcohol and psychotropic, addictive substance use control program.



All employees and contractors shall be informed during introduction training regarding:

- the expectations of behaviors relating to direct employees and contractor crews
- the workplace policy and procedures regarding the use of alcohol and other substances

- the forms of assistance and help offered to workers to manage alcohol and substance use problems.

VIII. Document control

Version	Author	Approval	Approval date
1.0	Raikos D.  24/11/2022	Krikella A.  Daftsis E. <i>Emmanouil E. Daftsis</i>	24/11/2022 24/11/2022

HG-01-SIMS-H&S- Reasonable cause determination-FR-001				 eldorado gold  Hellas GOLD	
Employee's name:		Date	___/___/___	Time:	
Supervisor:		Department:		Controller:	
<i>NOTE.: Make sure that any health problems are recorded as screening for substance abuse is conducted.</i>					
I. Concern/worry about the person's behavior based on (select the correct one):					
Reasonable cause		Consequential accident involving reasonable cause			
II. Employee's behavior: [If your answer to at least two of the following questions is "Yes", proceed to an examination].					
1. Does the person appear to be confused, dazed or disoriented?	Yes		No		
2. Have you experienced difficulty walking, instability or lack of coordination [loss of balance, stumbling or staggering, jerky movements, relying on a foreign object for help and balance)?	Yes		No		
3. Are you concerned about the person's way of speaking, his words, the rate of speech or the vagueness of his words?	Yes		No		
4. Are you concerned about a change in appearance (e.g., red eyes that shine or sloppy clothing)?	Yes		No		
5. On that particular day, were comments made or concerns expressed because of the person's unusual behavior?	Yes		No		
6. Did the individual in question "lapse in judgment" and/or deviate from the rules and procedures?	Yes		No		
Comments:					
III. Indications of possible alcohol/ substance use at work: [If at least one of your answers to the following is 'Yes', proceed to an examination).					
1. The person's breath smells of alcohol.	Yes		No		
2. Did you notice or discover that the person is carrying alcohol, other substances, or the like in the workplace?	Yes		No		
3. Did you or anyone else see the person use alcohol or another substance on that day?	Yes		No		
Comments:					
IV. Examination: The result was (Please Note):	Positive		Negative		*Not submitted
<i>If the test is positive, the Occupational Physician and the Managers of the Human Resources and Health, Safety & Training Departments are informed.</i>					
<i>If the test is negative, no archiving or copying of this document shall take place and it shall be served on the person concerned if he/she so wishes.</i>					
<i>*If no check was carried out, please state the reasons.</i>					
Supervisor's Name & Signature:				Nurse's Name & Signature:	
Issue	Date of issue	Revision Date	Author	Approval	Approval Date
1.0	23/11/2022	-	Raikos D.	Krikella A., Daftsis E.	23/11/2022