



eldorado gold



Environmental and Social Management System Framework

Document Reference	Version Number	Total Pages	Original Issue Date	Effective Date
	1.0		<i>First Issuance</i>	

Document Control and Key Information

Version History

Version	Effective Date	Change Description
1.0	8 July 2022	First Issuance

Preparation, Approval and Administration

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Related Documents

Reference	Title
SIMS	Sustainability Integrated Management System (Standard)
MOS	Management Operating System (Library of Documents)
Sustainability Policies	Corporate Sustainability Policies
IEMS	Hellas Gold Integrated Environmental Management System
Risk Register	Hellas Gold Risk Register
Commitment Register	Hellas Gold Commitment Register
ESMP	Hellas Gold Environmental and Social Monitoring Plan

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HELLAS GOLD reserves the sole and exclusive right to interpret and apply this framework in the manner HELLAS GOLD Management deems appropriate. HELLAS GOLD further reserves the right to change, modify, or revoke procedures or guidelines associated with this framework at any time, and in any manner deemed appropriate. This framework supersedes any previous materials on this subject matter. The objectives, commitments, and requirements in this Framework will be further developed in a detailed Environmental and Social Management System with supporting Standard Operating Procedures (SOPs). Once approved, the Environmental and Social Management System will supersede and replace this Framework.

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Acronyms

CEO	Chief Executive Officer
CFO	Chief Financial Officer
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
ESAP	Environment and Social Action Plan
ESMP	Environmental and Social Monitoring Plan
ESMS	Environmental and Social Management System
EU	European Union
EVP	Executive Vice President
GIIP	good international industry practice
HR	Human Resources
IEMS	Integrated Environmental Management System
ISO	International Standards Organisation
OHS	occupational health and safety
SIMS	Sustainability Integrated Management System
ToR	Terms of Reference
VP	Vice President

1. Introduction

This document sets out the Framework for the Cassandra Project Environment and Social Management System (ESMS). It defines the management practices and plans that will be applied across all Project functions and all stages of the Project life cycle to manage environmental and social (E&S) risks and meet related corporate and Project commitments.

For clarity, this document covers the full spectrum of occupational health and safety (OHS) and environmental and social performance-related issues to be addressed by the Project and is referred to herein as the ESMS Framework.

1.1. Objective and Application

The objective of the ESMS is to establish a comprehensive and consistent system for managing E&S risks. The ESMS is implemented at all levels of the organisation, and all stages of the Project, through separately administered management practices and plans. It applies equally to all Project staff and all Project contractors and subcontractors.

The ESMS is based on the principle of continuous improvement and is designed to:

- Define Eldorado and Hellas Gold management objectives and provide a tool to meet those objectives.
- Manage E&S risks effectively during construction, operation, and closure.
- Comply with relevant Greek and European Union (EU) legislation and good international industry practice (GIIP).
- Implement the Eldorado Sustainability Framework and Sustainability Integrated Management System (SIMS).
- Be incorporated into the Hellas Gold Integrated Environmental Management System (IEMS) for the Project (to be completed by the end of 2022).
- Establish clear roles, accountabilities, and responsibilities for elaboration, implementation, and continuous improvement.
- Outline a process for monitoring, evaluation, and improvement, as well as internal and external reporting.

1.2. Document Contents

This document contains the following sections:

1. Introduction
2. Overall Approach
3. Project Standards
4. Roles and Responsibilities
5. Monitoring and Reporting
6. Management Practices

2. Overall Approach

This section summarizes the overall E&S management approach for the Project, including its four key components, as shown on Figure 1.2-1:

- Corporate Vision and Values

- Corporate Sustainability Framework
- Hellas Gold IEMS
- Project ESMS

Corporate

Our Vision & Values

Eldorado's Vision and Values define our future as an organization and our approach to how we get things done.



Our Vision
To build a sustainable, high-quality business in the gold mining sector.



Values
Integrity
Collaboration
Agility
Courage
Drive

Sustainability Framework

Eldorado's Sustainability Framework articulates what sustainability means to Eldorado.

Corporate Sustainability Commitments

Safe, inclusive & innovative operations

Engaged & prosperous communities

Responsibly produced products

Healthy environment, now & for the future

Policies

Eldorado's Policies define our commitments on specific sustainability-related topics.

SIMS

SIMS provide performance-based standards that operationalize our Sustainability Framework and Policies across our global sites.

Site

Hellas Gold IEMS

Integrated Environmental Management System

Project ESMS

Environmental and Social Management System

Management Plans

OHS Management Plans

Environmental Management Plans

Social Management Plans

Implementation Tools

Standard Operating Procedures

Tracking & Documentation

Commitment Register & Document Control System

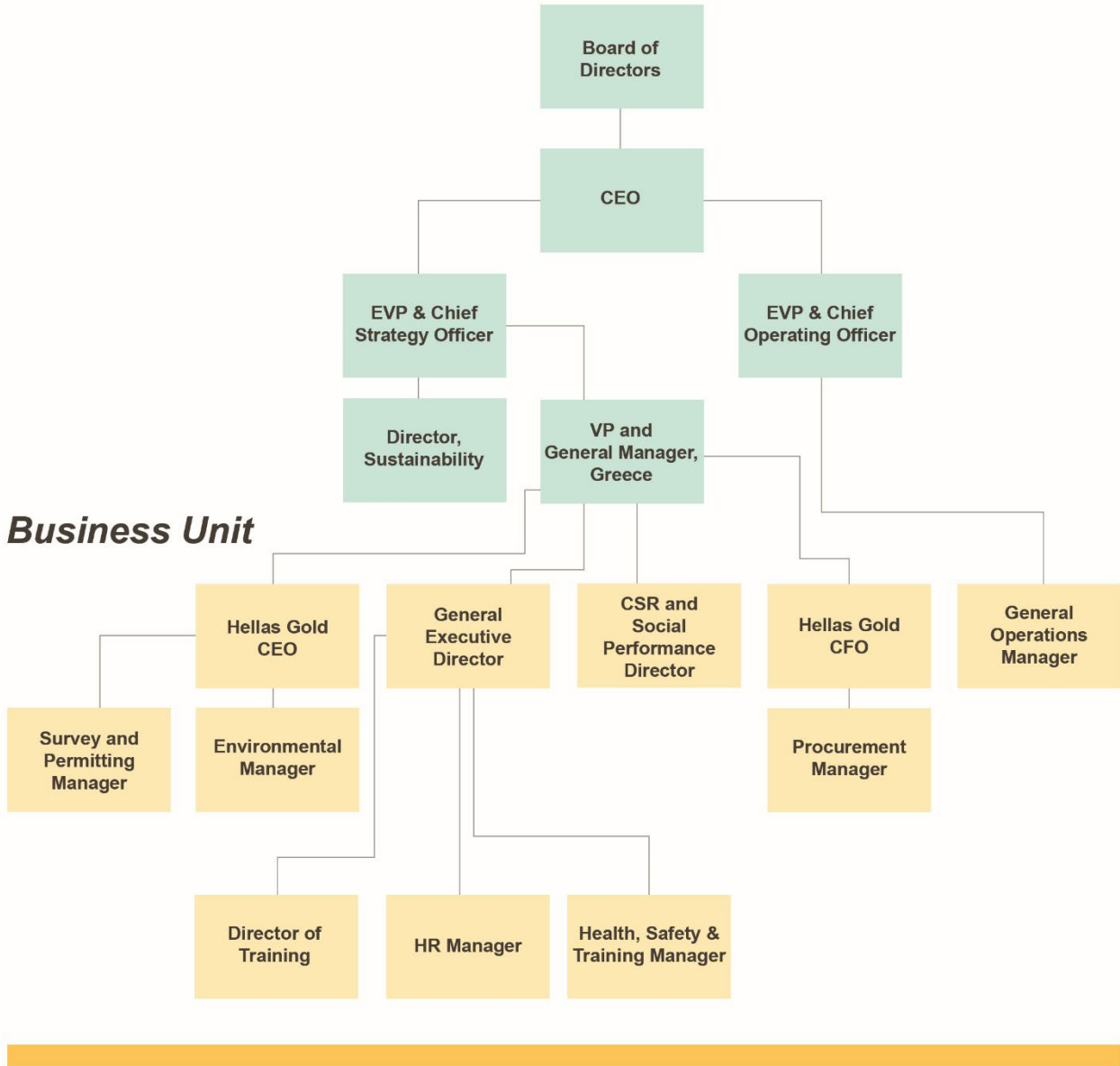
ESMS = Environmental and Social Management System; IEMS= Integrated Environmental Management System; OHS = occupational health and safety; SIMS = Sustainability Integrated Management System

Figure 1.2-1: The Overall E&S Management Approach for the Project

Figure 1.2-2 illustrates the organizational structure of E&S management at Eldorado corporate and Hellas Gold business unit levels. For clarity, this represents the ESMS leadership and implementation structure,

reflected in Section 4, Roles and Responsibilities; it is not intended to present a detailed organizational structure for the business.

Corporate



CEO = Chief Executive Officer; VP = Vice President; EVP = Executive Vice President; HR = Human Resources; CFO = Chief Financial Officer; CSR = Corporate Social Responsibility

Figure 1.2-2: The Organizational Structure of E&S Management at Eldorado Corporate and Hellas Gold Business Unit Levels

2.1. Corporate Vision and Values

The overall approach to E&S Management is anchored by Eldorado’s vision of building a sustainable, high-quality business in the gold sector, and its values of Collaboration, Integrity, Agility, Courage, and Drive.

2.2. Corporate Sustainability Framework

The Corporate Sustainability Framework describes Eldorado's overall approach to responsible mining. It is anchored by the company's vision of building a sustainable, high-quality business in the gold sector, and its values of Collaboration, Integrity, Agility, Courage, and Drive. The framework further comprises the following elements:

- Corporate Sustainability Commitments, which include:
 - Safe, inclusive, and innovative operations – fostering safe and inclusive workplaces that value diversity, personal growth, and innovation;
 - Engaged and prosperous communities – working with our communities in a spirit of mutual respect to grow local economies and deliver lasting opportunities;
 - Responsibly produced products – respecting human rights to deliver conflict-free responsibly produced products; and
 - Healthy environment, now and for the future – taking care of the environment through industry-leading practices and technology.
- Corporate Sustainability Policies, which outline Eldorado's commitments to protecting the environment and the safety of employees, stakeholders and the local community, and its expectation that all employees and suppliers operate in accordance with the highest standards of legal and ethical behaviour. They include:
 - The Safety Golden Rule
 - Code of Ethics and Business Conduct
 - Anti-Bribery and Anti-Corruption Policy
 - Diversity Policy
 - Shareholder Engagement Policy
 - Environment Policy
 - Social Performance Policy
 - Health and Safety Policy
 - Human Rights Policy
- SIMS, which establishes clear performance expectations and operationalises the Corporate Sustainability Commitments and many of the above Sustainability Policies. In short, it:
 - Sets out minimum performance standards regarding General Sustainability, OHS, Social Performance, Environment, and Security.
 - Provides an overarching system to guide Eldorado's sites through implementation and provides rigorous governance for compliance auditing to enable continuous improvement.
 - Builds on and integrates other responsible mining frameworks, including Mining Association of Canada's Towards Sustainable Mining and the World Gold Council's Responsible Gold Mining Principles.

2.3. Hellas Gold Integrated Environmental Management System

Hellas Gold has developed an IEMS, which has been certified by ISO14001 since 2014. The IEMS is largely focused on environmental risk management and reflects related commitments made by Hellas Gold to all activities of the Cassandra Mines during their entire life cycle.

The IEMS is structured to ensure that the Project is:

- Compliant in environmental and energy terms
- Socially responsible
- Economically sustainable

It is based around the following procedures:

- Environmental aspects
- Legal and other requirements
- Targets, programmes, and indicators
- Resources, roles, responsibility, duties, and competences
- Staff training
- Communication, participation, and consultation
- Document and file control
- Emergency management
- Calibration of monitoring equipment
- Conformity assessment
- Investigation of incidents, non-conformities, and corrective and preventive actions
- Internal audits
- Management review
- Fleet management
- Waste management
- Contractor/Supplier evaluation procedure
- Energy management

These procedures are reflected in the management practices listed in Section 6.

The IEMS relates to both Company employees and the staff of contractors, subcontractors, and suppliers, to the extent that they are located and operate at the Company's facilities or on behalf of the Company outside its facilities.

2.4. Project Environment and Social Management System Framework

This ESMS Framework is a key management tool for managing E&S risks for the life cycle of the Project. It will be integrated into the existing Hellas Gold IEMS, which in turn falls under the general jurisdiction of SIMS.

The ESMS Framework is implemented through the following components:

- Management practices that will ensure that E&S risks are managed appropriately and that continuous improvement in E&S performance is achieved;
- Topic-specific management plans that elaborate and operationalise the mitigation and management controls identified in the Environmental Impact Assessment (EIA) and Environmental and Social Impact Assessment, including monitoring and reporting requirements (see Section 6, Management Practices); and
- Standard Operating Procedures that provide additional, practical guidance to Project staff and contractors in the form of detailed actions and processes for specific tasks or activities.

Significantly, the ESMS Framework, as well as topic-specific management plans, will be reviewed on an annual basis, and updated as needed to:

- Reflect changes in the Project and/or context
- Address integration requirements with the Corporate SIMS

Responsibility for review and revisions/updates of the ESMS and topic-specific management plans lies with VP and General Manager, Greece, as indicated in Section 4, Roles and Responsibilities.

Moving forward, the ESMS, as well as topic-specific management plans, will follow the Hellas Gold document and file control procedure, which sets out how the Project:

- Approves documents before they are released
- Revises, updates, and re-approves documents
- Ensures that changes to documents and the current status of revisions have been specified
- Ensures that the documents needed are available at the locations where they are used
- Ensures that documents remain easy to read and traceable
- Ensures that documents are approved before distribution
- Ensures that the staff involved are briefed about new approved documents
- Ensures that external documents specified by the Company as necessary for designing and running the Management System can be identified and their distribution controlled
- Prevents unwanted use of old documents and affixes suitable labels if they are to be retained for any reason

3. Project Standards

The ESMS Framework meets the following requirements and standards:

- Greek legislative and regulatory requirements, as well as related EU directives (e.g., EIA Directive)
- Greek regulatory permit and license conditions
- 2019 European Bank for Reconstruction and Development (EBRD) Environmental and Social Policy and associated Performance Requirements, including related requirements identified by Project financiers/investors
- Eldorado Corporate Vision, Values, and Sustainability Framework, as described above, including the requirements of the SIMS
- Relevant EU substantive environmental standards, and other standards of GIIP, as defined within specific studies, reports, and management plans

4. Roles and Responsibilities

Table 2.4-1 describes the roles and responsibilities of Eldorado, Hellas Gold, and Project staff and contractors in the elaboration and implementation of the ESMS. Additional roles and responsibilities are defined in the topic-specific management plans outlined in Section 6, Management Practices.

Detailed roles and responsibilities will be developed and included in the ESMS as part of the ESMS Plan development.

Table 2.4-1: Key Roles and Responsibilities for ESMS Elaboration and Implementation

Role	Responsibility
Corporate	
Board of Directors and Sustainability Committee	<ul style="list-style-type: none"> ■ Advise and make recommendations to the Board to assist the Board in its oversight role with respect to the establishment and monitoring of the Company's environmental, health, safety, community relations, human rights, security, and other sustainability policies. ■ Periodically review and monitor Management's activities to ensure the key sustainability risks and opportunities are being identified and addressed.

Role	Responsibility
President and CEO	<ul style="list-style-type: none"> ■ Implement the Eldorado Sustainability Strategy. ■ Allocate personnel and resources to deliver on the strategy.
EVP & Chief Strategy Officer and EVP & Chief Operating Officer	<ul style="list-style-type: none"> ■ Reporting to the President & CEO, provide direction and oversee the implementation of the Eldorado Sustainability Strategy globally. ■ Oversee H&S performance. ■ Allocate personnel and resources to deliver on the strategy.
VP and General Manager, Greece	<ul style="list-style-type: none"> ■ Oversee implementation of the Eldorado Sustainability Strategy in Greece. ■ Oversee performance of the Hellas Gold IEMS and Project ESMS, including alignment with the Eldorado SIMS. ■ Report on progress.
Director, Sustainability	<ul style="list-style-type: none"> ■ Maintain Corporate sustainability policies. ■ Oversee implementation and maintain Eldorado SIMS. ■ Support Eldorado SIMS integration with the Hellas Gold IEMS and Project ESMS. ■ Report on progress.
Site	
Hellas Gold CEO	<ul style="list-style-type: none"> ■ Implement the Hellas Gold IEMS and Project ESMS. ■ Lead annual reviews and revisions/updates of the Project ESMS, including topic-specific management plans. ■ Integrate the Eldorado SIMS with the Hellas Gold IEMS and Project ESMS. ■ Oversee overall OHS, environmental and social performance. ■ Allocate adequate financial and human resources required for IEMS and ESMS implementation. ■ Report on progress.
Environmental Manager	<ul style="list-style-type: none"> ■ Support implementation of the Project ESMS, namely the environmental aspects. ■ Implement environmental management plans. ■ Undertake regular reviews and revisions/updates of environmental management plans. ■ Lead the environmental management team. ■ Manage overall environmental performance. ■ Report on progress.
CSR & Social Performance Director	<ul style="list-style-type: none"> ■ Support implementation of the Project ESMS, namely the social aspects. ■ Implement social management plans, including Stakeholder Engagement Plan. ■ Undertake regular reviews and revisions/updates of social management plans. ■ Lead the social management team. ■ Manage overall social performance. ■ Report on progress.
Health, Safety and Training Manager	<ul style="list-style-type: none"> ■ Support implementation of the Project ESMS, namely the OHS aspects. ■ Implement OHS management plans. ■ Undertake regular reviews and revisions/updates of OHS management plans. ■ Lead the OHS Management Team. ■ Manage overall OHS performance. ■ Report on progress.
HR Manager	<ul style="list-style-type: none"> ■ Work with CSR & Social Performance Director to implement the Labour Management Framework and to undertake regular reviews, revisions, and updates of same. ■ Oversee the design and implementation of an appropriate Employer Training and Competency Building Program, working with the CSR & Social Performance Director, Environmental Manager, and Health, Safety, and Training Manager, as well as the Director of Training.

Role	Responsibility
Director of Training	<ul style="list-style-type: none"> ■ Design and implement an appropriate Training and Competency Building Program for staff and contractors, as well as visitors. ■ Work with the CSR & Community Relations Director to identify community learning and development opportunities.
Procurement Manager	<ul style="list-style-type: none"> ■ Work with CSR & Community Relations Director to implement the Contractor Management Framework and to undertake regular reviews, revisions, and updates of same. ■ Oversee the design and implementation of an appropriate Contractor Training and Competency Building Program, working with the CSR & Community Relations Director, Environmental Manager, and Health, Safety, and Training Manager, as well as the Director of Training.
All Employees	<ul style="list-style-type: none"> ■ Complete required Project ESMS related induction and ongoing training/competency building. ■ Comply with the requirements of the Hellas Gold IEMS and Project ESMS, including related policies and procedures. ■ Report E&S impacts and risks to relevant supervisor. ■ Refer grievances to the Grievance Management team.
All Contractors	<ul style="list-style-type: none"> ■ Complete required Project ESMS-related induction and ongoing training, in accordance with their contract. ■ Comply with the requirements of the Hellas Gold IEMS and Project ESMS, including related policies and procedures, in accordance with their contract. ■ Report actual and potential E&S incidents, impacts, and risks to relevant supervisor or person in charge. ■ Refer grievances to the Grievance Management Team.
Community of Interest Committee	<ul style="list-style-type: none"> ■ Meet on a regular basis to discuss environmental and social performance and provide advice and guidance to Hellas Gold. ■ Share information with other community-based stakeholders and relay their questions, concerns, and suggestions to the Committee for discussion. ■ Advise on the elaboration and implementation of management plans. ■ Assist with monitoring and reporting activities. ■ Serve as a forum for discussion and resolution of particular grievances, where appropriate.

CEO = Chief Executive Officer; CSR = Corporate Social Responsibility; ESMS = Environmental and Social Management System; EVP = Executive Vice President HR = Human Resources; IEMS = Integrated Environmental Management System; OHS = occupational health and safety; SIMS = Sustainability Integrated Management System; VP = Vice President

5. Monitoring and Reporting

5.1. Monitoring

Corporate requirements for monitoring are set out within the SIMS, which includes the need for monitoring to be informed by baseline information, regulatory requirements, and predictive modelling (as appropriate). Monitoring activities must be commensurate with anticipated risks and impacts, but include, at minimum, applicable standards, monitoring parameters, monitoring type and frequency, monitoring locations (as relevant), and monitoring methods.

The Project has an extensive monitoring programme in place that forms part of the IEMS. This monitoring programme aligns with applicable Greek and international standards and GIIP. It includes:

- An overarching monitoring programme, including commitment register and performance indicators, in support of implementation of this Management System; and
- Additional topic-monitoring programs, including performance indicators, schedules, and targets in support of the elaboration and implementation of topic-specific management plans.

Hellas Gold has a detailed Environmental Monitoring Plan that will be developed into an Environmental and Social Monitoring Plan (ESMP) as one of the Environmental and Social Action Plan (ESAP) actions. The ESMP for the Project will consolidate all monitoring programs, commitments, activities, and indicators for ease of implementation. The ESMP will ensure that any non-compliance with established targets is recorded, reported, and investigated. It will further ensure that recommended actions are documented, assigned to appropriate individuals, and tracked through to completion.

5.2. Reporting

Reporting requirements are defined within topic-specific management plans of the ESMS. The overall performance of the ESMS will be tracked and reported as follows.

Internal reporting:

- Monthly E&S reports produced by the Hellas Gold CEO and provided to the VP and General Manager, Greece, as well as the Sustainability Director;
- Monthly summary E&S reports produced by the Sustainability Director and provided to the President and CEO; and
- Quarterly E&S reports produced by the President and CEO and provided to the Board of Directors.

External reporting:

- Quarterly monitoring reports provided to the Community of Interest Committee (CIC), including summary of stakeholder engagement activity, grievance management, and implementation status of the ESMS Framework;
- Quarterly summary of grievance management (number, types of grievances received, resolution status) posted at worksite and community office;
- To the EBRD: every 4 months during construction and the first year of operations, and then annually starting on the second year of operations and going forward, as part of Environmental and Social Action Plan (ESAP) reporting;
- Summaries of any evaluations or audits done by third parties to the CIC;
- Annual reporting in publicly disclosed Eldorado Sustainability Reports and in local summaries of the same; and
- Ongoing permit compliance reporting to relevant government departments.

6. Management Practices

Management practices ensure that E&S risks are addressed appropriately and that continuous improvement in E&S performance is achieved. They are structured around a Plan – Do – Check – Act approach, and are listed in Table 5.2-1.

Table 5.2-1: ESMS Management Practices

	Management Practice
PLAN	Complying with Legal and Other Requirements (Section 6.1)
	Managing E&S Risks (Section 6.2)
	Defining Targets, Programs, and Indicators (Section 6.3)
DO	Identifying Resources, Roles, and Responsibilities (Section 6.4)
	Training and Competency Building (Section 6.5)
	Communicating and Consulting (Section 6.6)
	Managing Change (Section 6.7)

	Management Practice
	Topic-specific Management Planning (Section 6.8), including: <ul style="list-style-type: none"> ■ OHS Management Plans ■ Environmental Management Plans ■ Social Management Plans
	Preparing for Emergencies (Section 6.9)
	Managing Contractors and Suppliers (Section 6.10)
CHECK	Assessing Performance (Section 6.11)
	Investigating and Action Planning (Section 6.12)
ACT	Reviewing the ESMS (Section 6.13)

E&S = Environment and Social; ESMS = Environmental and Social Management System; OHS = Occupational Health and Safety

Each practice has a particular purpose, a series of required actions, a responsible party, and reference to related Project documentation (both existing and pending). Further detail on each practice is presented in the following subsections.

6.1. Complying with Legal and Other Requirements

Purpose: To identify and comply with all legislative, regulatory, permitting, and other requirements, including the corporate Sustainability Framework and Project commitments.

Scope of Application: Applies to all Project activities throughout its life cycle (i.e., construction, operation, and closure).

Key Actions:

1. Keep up to date about legislative, regulatory, permitting, and other requirements.
2. Establish and maintain a Commitments Register.
3. Monitor performance to ensure compliance.
4. Ensure the ESMS and topic-specific management plans are updated as required to reflect new requirements.
5. Define appropriate Project policy to enshrine E&S commitments.
6. Communicate Project policy internally and disclose externally.

Implementation Responsibility: Hellas Gold CEO

Related Documents:

- Eldorado sustainability policies
- ESMS Commitment Register

6.2. Managing Environmental and Social Risks

Purpose: To identify, assess, and manage E&S risks for the Project.

Scope of Application: Applies to all Project activities throughout its life cycle (i.e., construction, operation, and closure).

Key Actions:

1. Establish hazard and risk identification, assessment, and management procedures for all Project activities.

2. Build and maintain a Risk Register, which documents identified risks, summarizes management controls, and assigns residual risk ratings.
3. Define needed actions and/or develop plans to manage identified risks and residual risks.
4. Undertake a detailed review of the Risk Register on a quarterly basis to keep it up to date and document closeout of assigned actions.

Implementation Responsibility: Hellas Gold CEO

Related Documents:

- Hellas Gold Risk Register

6.3. Defining Targets, Programs, and Indicators

Purpose: To adopt targets, create programs and processes, and define key performance indicators to enable continuous improvement in E&S risk management and sustainability performance.

Scope of Application: Applies to all Project activities throughout its life cycle (i.e., construction, operation, and closure).

Key Actions:

1. Undertake regular review of E&S performance against the objectives and targets identified in the Commitments Register.
2. Ensure such targets reflect:
 - a. Company principles and commitments
 - b. E&S risks identified in the Risk Register
 - c. The legal and other requirements to which the Company is subject
 - d. The consequences of the effort to achieve targets in other activities and processes
 - e. The objections of interested parties
 - f. The economic dimension of their adoption
 - g. Their compatibility with the Company's operating and business strategy
 - h. The extent to which they are feasible within a specific period
 - i. Their effectiveness in terms of the Company's commitment to continuous improvement
 - j. Objectives from the annual management review
3. Develop annual improvement plans to address deficiencies and capture opportunities.
4. Define appropriate indicators, as well as monitoring and reporting protocols, and integrate same into the relevant management plans.
5. Include E&S performance considerations in annual performance reviews for all staff, and reflect them in career development and remuneration.

Implementation Responsibility: Hellas Gold CEO

Related Documents:

- Hellas Gold Commitment Register
- Environmental and Social Monitoring Plan (ESMP)

6.4. Identifying Resources, Roles, and Responsibilities

Purpose: Ensure the availability of the necessary resources to implement and continuously improve the ESMS, and clearly assign roles and responsibilities.

Scope of Application: Applies to all Project activities throughout its life cycle (i.e., construction, operation, and closure).

Key Actions:

1. Ensure sufficient financial resources are budgeted for ESMS implementation, including required staff and contractors.
2. Elaborate E&S-related roles and responsibilities, as identified in Table 2.4-1.
3. Assign roles and responsibilities to Hellas Gold staff and contractors and ensure these are reflected in job descriptions and contract documentation.
4. Update E&S-related organizational charts, as shown on Figure 2.4-1, and communicate internally.
5. Ensure relevant E&S Committees (both internal and external) are established, including Terms of Reference (ToR) for same, as set out in the management plans.
6. Ensure that annual performance reviews for all staff and contractors include E&S performance considerations.

Implementation Responsibility: Hellas Gold HR Manager

Related Documents:

- Job descriptions of ESMS Framework implementation team
- E&S Committee ToR

6.5. Training and Competency Building

Purpose: Provide appropriate training and build necessary competencies to manage E&S risks appropriately and implement the ESMS.

Scope of Application: Applies to all Project activities throughout its life cycle (i.e., construction, operation, and closure).

Key Actions:

1. Assess ESMS-related training needs on an annual basis for both staff and contractors.
2. Design and regularly update basic ESMS awareness training for all staff and contractors, and deliver the training at an appropriate frequency.
3. Design ESMS-related training programs as required and deliver the training at an appropriate frequency.
4. Design and keep updated ESMS induction training for new staff, contractors, and visitors, and deliver as part of onboarding/orientation process.
5. Identify specific ESMS competency requirements, including licenses and certificates, for staff and contractors exposed to significant E&S risks, including:
 - a. Support existing staff and contractors in addressing deficiencies.
 - b. Build such requirements into recruitment/procurement processes for new staff and contractors.
6. Document and retain records of all training delivered.

Implementation Responsibility: Hellas Gold Director of Training

Related Documents:

- Annual Hellas Gold Training Needs Assessment
- Training Plans and Records for named individuals

6.6. Communicating and Consulting

Purpose: To engage with staff, contractors, and external stakeholders to ensure effective E&S risk management, as well as continuous improvement of the same.

Scope of Application: Applies to all Project activities throughout its life cycle (i.e., construction, operation, and closure).

Key Actions:

1. Design and implement an engagement program for staff and contractors on E&S risk management and ESMS implementation, including the following activities:
 - a. Establish regular communications activities to share information, including raising general awareness, explaining roles and responsibilities, and providing regular reporting on performance, including grievance management, incidents and near misses, and lessons learned.
 - b. Establish regular consultation activities to provide meaningful opportunities for employees and contractors to contribute to the continuous improvement of the ESMS.
 - c. Provide internal feedback mechanisms for employees and contractors to provide suggestions, ask questions, or lodge complaints or grievances.
 - d. Provide additional engagement opportunities as part of topic-specific management plans.
2. Design and implement an engagement program for external stakeholders on E&S risk management and ESMS implementation, including the following activities:
 - a. Build and maintain an external stakeholder map that identifies key stakeholders and assesses their interests, influences, and attitudes.
 - b. Establish regular communications activities to share information, including raising general awareness, explaining roles and responsibilities, and providing regular reporting on performance, including grievance management.
 - c. Create a multi-stakeholder CIC, with ToR, to help guide external stakeholder engagement and serve as a forum for more focused discussion on specific issues.
 - d. Provide regular consultation activities to provide meaningful opportunities for external stakeholders to contribute to the continuous improvement of the ESMS.
 - e. Provide external feedback mechanisms for stakeholders to provide suggestions, ask questions, or lodge complaints or grievances.
 - f. Provide additional engagement opportunities as part of issue-specific management plans.
 - g. Capture all external-stakeholder-related engagement activities in a Stakeholder Engagement Plan for ease of implementation.

Implementation Responsibility: Hellas Gold CSR & Social Performance Director, Hellas Gold Health, Safety and Training Manager

Related Documents:

- Stakeholder Engagement Plan
- Grievance Management Plan (internal and external)

- Internal communications procedure
- CIC ToR

6.7. Managing Change

Purpose: To manage E&S risks associated with any changes to business activities or processes.

Scope of Application: Applies to all Project activities throughout its life cycle (i.e., construction, operation, and closure).

Key Actions:

1. Establish a Management of Change Procedure to identify, evaluate, and control any impacts on E&S performance and ESMS implementation emerging from changes to business activities or processes.
2. Incorporate a risk assessment to ensure that risks are well understood and that appropriate mitigation and management controls are built into any proposed changes.
3. Create a related procedure for notifying regulators, financiers, and other key stakeholders about proposed changes to business activities or processes, and how any implications for E&S performance will be managed.
4. Define communications and training programs to accompany any proposed changes to ensure that they are well understood and accepted.
5. Update operating procedures accordingly.

Implementation Responsibility: Hellas Gold CEO

Related Documents:

- SIMS Management of Change Requirements
- Hellas Gold Management of Change Procedure
- External notification procedure

6.8. Topic-Specific Management Planning

Purpose: To prepare and implement management plans to address specific E&S risks and operationalize related mitigation measures and management controls.

Scope of Application: Applies to all Project activities throughout its life cycle (i.e., construction, operation, and closure).

Key Actions:

1. Develop Management Plans as identified in Table 6.8-1.
2. Track and manage Management Plan commitments in the Commitment Register for the Project.
3. Review and update the Commitment Register regularly, and report on the same to Hellas Gold management.
4. Monitor Management Plan effectiveness as part of the ESMP, and report on the same to Hellas Gold management.

Table 6.8-1: Topic-Specific Management Plans

OHS Management Plans	Environmental Management Plans	Social Management Plans
Emergency Response Plan	Biodiversity Management Plan	Stakeholder Engagement Plan
Traffic and Transport Management Plan	Extractive Waste Management Plan	Grievance Management Framework (part of Stakeholder Engagement Plan)
Contractor Management Plan	Non-Mineral Waste Management Plan	Land Acquisition Plan
Security Management Plan	Air Emissions Management Plan	Community Development Plan
	Hazardous Materials Management Standard Operating Procedures	Community Health and Safety Management Plan
	Conceptual Mine Closure Plan	Labour Management Plan
	Water Resources Management Plan	Cultural Heritage Management Plan
	Noise and Vibration Management Plan	Influx Management Plan

OHS = occupational health and safety

Implementation Responsibility: Hellas Gold Environmental Manager, Hellas Gold CSR & Social Performance Director

Related Documents:

- Topic-specific management plans (see Table 6.8-1)

6.9. Preparing for Emergencies

Purpose: To ensure that appropriate measures to protect the health and safety of staff, contractors, and communities are identified and ready for implementation in the event of an emergency.

Scope of Application: Applies to all Project activities throughout its life cycle (i.e., construction, operation, and closure).

Key Actions:

1. Establish and maintain an Emergency Response Plan.
2. Engage with staff, contractors, and external stakeholders (e.g., local authorities and first responders) to make sure the Plan benefits from their input, and that emergency scenarios, risks, roles, responsibilities, and procedures are clear and well-understood.
3. Test the Emergency Response Plan regularly, including desktop exercises and full-scale exercises.
4. Ensure those involved in responding to emergencies are appropriately trained.

Implementation Responsibility: Hellas Gold Health, Safety and Training Manager

Related Documents:

- Emergency Response Plan
- Crisis Response Procedure

6.10. Managing Contractors and Suppliers

Purpose: To ensure that E&S risks associated with procurement of goods and services are managed appropriately.

Scope of Application: Applies to all Project activities throughout its life cycle (i.e., construction, operation, and closure).

Key Actions:

1. Assess the E&S risks associated with the procurement of needed goods and services.
2. Include clear performance expectations related to E&S risk management and ESMS implementation in all tender and contract documents.
3. Include explicit criteria related to E&S risk management and ESMS implementation in all contractor and supplier evaluations and selections.
4. Ensure that procured goods and services meet E&S risk management and ESMS implementation requirements.
5. Establish and implement Hazardous Materials Management standard operating procedures to manage the delivery, storage, use, and disposal of hazardous materials.
6. Ensure the Contractor Management Plan includes appropriate training regarding E&S risk management and ESMS implementation, as well as monitoring of the same.

Implementation Responsibility: Hellas Gold Procurement Manager

Related Documents:

- Contractor Management Plan
- Hazardous Materials Standard Operating Procedures

6.11. Assessing Performance

Purpose: To monitor and evaluate E&S performance to ensure compliance and conformance, and enable continuous improvement.

Scope of Application: Applies to all Project activities throughout its life cycle (i.e., construction, operation, and closure).

Key Actions:

1. Establish ongoing monitoring programs in support of ESMS and management plan implementation and track E&S performance over time.
2. Provide regular reports on monitoring results, together with recommendations for future performance improvements, to Eldorado Board of Directors, Eldorado management, and Hellas Gold management, as well as external stakeholders.
3. Establish a regular evaluation program in support of ESMS and management plan implementation, including both internal and external audits by subject matter experts.
4. Provide regular reports on evaluation results, together with recommendations for future performance improvements, to Eldorado Board of Directors, Eldorado management, and Hellas Gold management, as well as external stakeholders.
5. Consolidate monitoring, evaluation, and reporting related commitments and activities in the Environmental and Social Monitoring Plan for ease of implementation.
6. Incorporate approved performance improvement recommendations into the Commitment Register.

Implementation Responsibility: Hellas Gold CEO (monitoring and reporting); Eldorado Director of Sustainability (evaluation and reporting)

Related Documents:

- ESMP
- Audit reports and corrective actions

6.12. Investigating and Action Planning

Purpose: To investigate all incidents and non-conformances, capture lessons learned, and define appropriate corrective and preventive actions.

Scope of Application: Applies to all Project activities throughout its life cycle (i.e., construction, operation, and closure).

Key Actions:

1. Establish incident, non-conformance, and near-miss reporting and management procedures, including clear roles and responsibilities for staff and contractors.
2. Build awareness among staff and contractors of their roles and responsibilities, including their duty to report incidents, non-conformances, and near misses in a timely manner.
3. Investigate all incidents and non-conformances in a manner commensurate with the potential consequences.
4. Identify lessons learned and capture performance improvement recommendations, including any corrective and preventive actions.
5. Engage relevant internal and external stakeholders in the investigation, and communicate results of the same, as required.
6. Provide notification and regular reports to Eldorado Board of Directors, Eldorado management, and Hellas Gold management, as well as external stakeholders, as required.

Implementation Responsibility: Hellas Gold CEO, Hellas Gold Health, Safety and Training Manager

Related Documents:

- Incident Reporting Procedure
- Incident Investigation Reports

6.13. Reviewing the ESMS

Purpose: To ensure that the ESMS remains effective in managing E&S risks and meeting Project objectives and commitments.

Scope of Application: Applies to all Project activities throughout its life cycle (i.e., construction, operation, and closure).

Key Actions:

1. Undertake an annual review of the ESMS to evaluate its performance in managing E&S risks and meeting Project objectives and commitments, and to recommend any improvements.
2. Consider results from monitoring and evaluation activities, and any investigations of incidents and non-conformances.
3. Update the ESMS as required.

Implementation Responsibility: Hellas Gold General Operations Manager

Related Documents: Management System Review procedure