

**Hellas Gold SA – Kassandra Mines (including Skouries) (Greece)**  
**Environmental and Social Action Plan (ESAP)**

FINAL

11 November 2022

No.	Action	Environmental & Social Risks (Liability/Benefits)	Requirement (Legislative, EBRD PR, Good Practice)	Resources, Investment Needs, Responsibility	Timetable	Completion criteria
<b>PR1</b>	<b>Assessment and Management of Environmental and Social Risks and Impacts</b>					
1.1	<p>Submit an environmental and social<sup>1</sup> (E&amp;S) report to the EBRD on the environmental and social performance of the Project<sup>2</sup> and the status of the implementation of this ESAP.</p> <p>Where an independent investor E&amp;S monitoring consultant is retained (by the investors or Hellas Gold), reports from such consultant may be used to respond to this ESAP Action 1.1.</p>	EBRD Reporting requirement.	EBRD Performance Requirement (PR) 1	Hellas Gold	<p>During construction, commissioning and first year of operations: quarterly.</p> <p>Operations onwards: annually.</p>	Environmental and social reports (template to be provided by the EBRD) and ESAP progress updates satisfactory to the EBRD.

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<sup>1</sup> Social includes occupational and community health, safety, security, gender and human rights as well as human resources matters and working conditions.

<sup>2</sup> EBRD financing to support the development of Hellas Gold SA's Skouries gold copper mine as well as for various investment at its existing Kassandra Mines Complex, which is located in Halkidiki Peninsula in northern Greece. Hellas Gold SA is a subsidiary of Eldorado Gold Corporation of Vancouver, Canada.

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1.2	Develop and implement the E&S management, including monitoring, frameworks (including biodiversity offset strategy) that form part of the ESIA into detailed E&S management, including monitoring, plans (ESMPs), including supporting plans and procedures referenced within the frameworks. Update the plans as necessary to respond to project needs, changes in conditions and impacts, legislation updates, etc.	Appropriate management of E&S issues.	EBRD PR 1 Good International Practise (GIP)	Hellas Gold	Construction related aspects of E&S management plans, including relevant supporting plans and procedures – Before start of Project construction works.  Remaining aspects of E&S management plans (including operational aspects), including relevant supporting plans and procedures – as per the timetable set out for specific E&S management frameworks in this ESAP and as defined in the disclosed E&S management frameworks.	Full set of Hellas Gold approved ESMPs and procedures.
1.3	Complete full implementation of the ESMS Framework, including integration of social requirements and ESMPs into existing ESMS.	Appropriate management of E&S issues.	EBRD PR 1 GIP	Hellas Gold	By FID <sup>3</sup> + 10 months.	Appropriate ESMS in place and implemented.  Full implementation of the ESMS will be demonstrated through monitoring program reports

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<sup>3</sup> Final Investment Decision (FID) by Eldorado Gold.

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1.4	Implement the Contractor Management Plan (to be developed based on contractor management framework), including the monitoring of primary suppliers, and include all relevant E&S requirements into new primary supplier contracts.	Appropriate management of contractors	EBRD PR 1	Hellas Gold	Prior to post-FID contracting for the Project.  Applicable to all new primary supplier contracts and operations by FID +7 months.	Contractor Management Plan implemented.  E&S conditions included in new contractor contracts.
1.5	Designate appropriate E&S resources to manage Project E&S risks in line with EBRD's PRs. Specifically, increase the resources dedicated to stakeholder engagement and community investment programme implementation. As a minimum, three Community Liaison Officers should be recruited before the start of the Project construction works. One of the CLOs should also act as a Grievance Management Officer / Grievance Coordinator.	Management of E&S risks and impacts	EBRD PR 1	Hellas Gold	Before start of construction works.	Organisational charts for E&S resources.  Defined Job descriptions.  Training provided.
1.6	Define and set up the external monitoring committee and/or third party auditing team including roles and requirements for effective and efficient participation on the committee/auditing team. A schedule of inspections and reporting to be defined and implemented.	Appropriate monitoring of E&S aspects.	Legislative	Hellas Gold	Set up the external monitoring committee and/or third party auditing team including committee resolution by FID +4 months.  Define schedule of inspections and reporting by FID +7 months.  Start implementation of external monitoring by FID +10 months.	Monitoring committee resolution / Auditing protocol. Schedule of inspections. Committee Meeting minutes (if applicable). Site inspection/auditing reports.
1.7	Any material changes to management plans/approaches, will be raised with the EBRD for approval.	Appropriate management of E&S issues in line with EBRDs PRs.	EBRD PR 1	Hellas Gold	As needed.	EBRD approval /sign off.

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<b>PR2</b>	<b>Labour and Working Conditions</b>					
2.1	Perform a gap analysis on labour provisions and implementation to assess if the Project's labour and human resources policies are aligned with PR 2, including implementation of findings.	Appropriate management of company and primary supplier labour risks.	EBRD PR 2	Hellas Gold	Before start of construction works.	Gap analysis report. Implementation of findings.
2.2	<p>Develop a Gender-Based Violence and Harassment – GBVH – policy), include it in the overall Hellas Gold procedures, and disclose it to employees, contractors and public.</p> <p>Develop and implement a GBVH incident reporting procedure and train employees, including primary suppliers.</p> <p>Assign and train GBVH focal points to deal with GBVH related incidents and grievances.</p> <p>Develop response measures and support mechanisms for GBVH survivors.</p> <p>Ensure GBVH requirements into requirements for contractors and its sub-contractors.</p>	Elimination of GBVH	EBRD PR 2 EBRD PR 4	Hellas Gold Contractors	<p>Develop a GBVH policy and GBVH incident reporting procedure by FID +4 months.</p> <p>Disclose the Policy and Procedure and develop training materials by FID +7 months.</p> <p>Assign GBVH focal points and deliver training by FID + 10 months.</p> <p>Cascade GBVH into contract requirements with primary suppliers by FID +7 months.</p>	<p>GBVH policy.</p> <p>GBVH reporting mechanism.</p> <p>GBVH requirement in Hellas Gold procedures.</p> <p>GBVH focal points.</p> <p>GBVH training records.</p> <p>GBVH response measures and support mechanism.</p> <p>GBVH requirements applicable to primary suppliers.</p>
2.3	Conduct labour audits during the construction phase (every six months) and during operations (annually) using independent labour experts to ensure compliance of contractors and their subcontractors with labour legislation and EBRD PR 2 and 4. The frequency of audits to be reviewed with the EBRD following initial audit reports.	Improved employee/contractor relationship with management	EBRD PR 2 and PR 4	Hellas Gold	<p>From start of and during construction – every six months.</p> <p>During operations – annually.</p>	Labour audit reports and corrective action plans. Included in reporting to EBRD.
2.4	Develop and implement a housing policy that meets the requirements set out in the IFC and EBRD guidance note 'Workers' accommodation: processes and standards' (IFC/EBRD 2009).	Management of worker/contractor accommodation risks.	EBRD PR 2	Hellas Gold	Before start of construction works.	Housing Policy. Evidence of policy being implemented.

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2.5	Ensure that a worker Grievance Mechanism in line with EBRD PR2 requirements and available to all workers, contractors and sub-contractors, is in place.	Enable Hellas Gold to address worker concerns and promote good workforce relationships	EBRD PR 2	Hellas Gold Contractor Sub-contractors	Before start of construction works.	Worker Grievance Mechanism in place and grievance records/ reports.
2.6	<p>Implement the Community Development Plan and Labour Management Plan (to be developed based upon the Community Development Framework and Labour Management Framework). This will include the development of a staff (including contractors) recruitment programme seeking to maximise local employment and provide equal opportunities (men, women and vulnerable groups, etc.). Key considerations to include:</p> <ul style="list-style-type: none"> <li>Local employment targets for affected communities and neighbouring municipalities with KPIs for skilled, semiskilled and unskilled workers.</li> <li>Methods of disclosure of job opportunities to local communities.</li> <li>Process for local people hired on a short-term basis during construction to obtain permanent contracts during the operational phase.</li> <li>Provisions to facilitate recruitment and upskilling of women and other vulnerable groups through initiatives to encourage their application to jobs.</li> </ul>	Enhance job opportunities and skills development for local communities.	EBRD PR 2 GIP	Hellas Gold Contractor	<p>Development of the Community Development Plan and Labour Management Plan (including listed considerations under “Action”) by FID +4 months.</p> <p>Demonstrate implementation of the Community Development Plan and Labour Management Plan starting FID +7 months and based on ongoing quarterly monitoring (as per the monitoring plan).</p>	<p>Community Development Plan and Labour Management Plan in place and implemented.</p> <p>Evidence of ongoing disclosure of job opportunities and provision of skills development for local community members (as per the dedicated monitoring plan).</p>

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2.7	Implement the Security Management Plan (to be developed based on the Security Management Framework) and in compliance with the Voluntary Principles on Security and Human rights and EBRD PR 4.	<p>Appropriate restriction of site access to ensure safety of public and workforce and integrity of site infrastructure.</p> <p>Ensure compliance with international standards on security provision.</p> <p>Facilitate means to address grievances related to conduct of site security personnel.</p>	<p>EBRD PR2</p> <p>EBRD PR4</p> <p>GIP - Voluntary Principles on Security &amp; Human Rights and the IFC Good Practice Handbook: Use of Security Forces: Assessing and Managing Risks and Impacts</p>	<p>Hellas Gold</p> <p>Security contractors</p>	<p>Before start of construction works.</p>	<p>Provision of Security Management Plan including security risk assessment.</p> <p>Security Code of Conduct.</p> <p>Evidence of regular training and monitoring of provision of contracted security services.</p>

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2.8	<p>Ensure that an appropriate Supply Chain Management System or similar is in place and implemented. It should include the following provisions:</p> <ul style="list-style-type: none"> <li>Establish a responsible sourcing policy; a supplier selection criteria and procedure and ensure traceability from suppliers through maintenance of a register of all Project primary suppliers.</li> <li>Ensure all primary suppliers adopt self-declarations and codes of conduct regarding prohibition of any forms of forced and child labour in their operations prior to any engagement with them.</li> <li>Dis-engagement clauses to be added to agreements with primary suppliers in case of material non-compliance with key E&amp;S risk management requirements.</li> <li>Monitoring procedure to ensure ongoing compliance with Project requirements, including definition of the frequency of monitoring and issues to be monitored, focusing on age of workers and presence of forced labour etc.</li> <li>Hellas Gold to provide immediate notifications to EBRD if/when forced/child labour risks or allegations are raised in relation to its primary suppliers.</li> </ul>	Effective oversight of labour rights within the primary supply chain, to reduce labour violations and abuse of human rights.	EBRD PR 1 EBRD PR 2	Hellas Gold	<p>Develop the Supply Chain Management System, including the responsible sourcing policy and a plan to implement the system and the policy by FID +4 months.</p> <p>Undertake risk assessment of primary suppliers for forced/ child labour as per the Supply Chain Management System. Investigate material non-compliances and develop plan for corrective actions and monitoring of completion by FID +6 months</p> <p>Ensure primary suppliers have adopted self-declarations and codes of conduct regarding prohibition of any forms of forced and child labour, add disengagement clauses in case of material non-compliance with key E&amp;S risk management requirements to contracts FID +7 months.</p> <p>Establish and implement the monitoring procedure by FID +16 months (December 2023).</p>	<p>Supply chain management system or similar.</p> <p>Responsible sourcing policy</p> <p>Supplier mapping.</p> <p>Supplier risk assessment results.</p> <p>Corrective action and monitoring plans for material non-compliances</p> <p>Supply chain monitoring procedure</p> <p>Supply chain monitoring reports</p>



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2.9	As part of the development of the Contractor Management Plan, establish a mechanism for new Contractors to use Hellas Gold's Grievance Redress Mechanism (GM) for 3 <sup>rd</sup> party grievances, if they do not have a suitable GM in place.		EBRD PR2 EBRD PR10	Hellas Gold	By FID + 6 months	Contractor Management Plan available, including a mechanism to have the Contractors using Hellas Gold's Grievance Redress Mechanism for 3 <sup>rd</sup> parties grievances if they do not have a suitable GM in place
<b>PR3</b>	<b>Resource Efficiency and Pollution Prevention and Control</b>					
3.1	Assess and progress viable Energy Conservation Measures (ECMs).	Continued improvement.	EBRD PR 3	Hellas Gold	Annually.	ECM Plan.
3.2	Further analyse and refine recommended climate change measures as part of Eldorado's commitment to full TCFD alignment. Additional or new measures to be identified in the future as Eldorado updates its physical risk assessment for the Cassandra Mines.	Climate change risk management.	EBRD PR 3 GIP	Hellas Gold	Review the climate change risk assessment annually and update it as needed based on material change to operations or availability of climate data/material change to approach.	Updated climate change risk assessment.
3.3	Identify Best Available Techniques (BAT) opportunities that can be applied to the existing operations, based on economic analysis and financial and operational feasibility, and develop plans for implementing these as appropriate.	Continued improvement.	EBRD PR 3 GIP	Hellas Gold	Identify Best Available Techniques (BAT) opportunities by FID +13 months. Review BAT every 5 years.	BAT reviews and implementation plan.
3.4	The potential for decanting (including post-closure) and related water contamination issues should be further assessed to ensure that appropriate measures are in place (if required), particularly once mining has ceased (of relevance to Madem Lakkos and Mavres Petres mines in the short term). Post-closure period for ongoing monitoring/ treatment to be defined. Further work is needed as part of an Integrated Closure Plan to account for short-term and long-term liabilities that need to be financially accounted for.	Water management. Closure and post-closure impact management.	EBRD PR 3 GIP	Hellas Gold Specialist consultant	Two years prior to closure at each of the Cassandra mines. Integrated into closure planning timeline.	Specialist report.  Revised closure plan costing addressing findings of specialist report.
3.5	Complete additional geochemical modelling as described in the Water Resources Management Framework and include outcomes in the water resources management and monitoring plan.	Water management	GIP	Hellas Gold Specialist consultant	By FID +12 months for the completion of the studies.	Specialist reports. Updated water resources management and monitoring plan.

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3.6	Incorporate detailed acid rock drainage testing schedule into the water resources management and monitoring plan.	Water management	GIP	Hellas Gold Specialist consultant	By FID +12 months.	Updated water resources management and monitoring plan.
3.7	Hellas Gold to review its use of hazardous substances and, (where financially and technically feasible), develop a strategy to avoid or minimise the use of hazardous substances. Update, where needed, risk management measures to control the release of this material into air, water and/or land as a result of transportation, handling, storage, use and disposal.	Hazardous material management	EBRD PR 3 & 4 GIP	Hellas Gold	By FID +18 months.	Hazardous materials strategy. Updated risk management measures where necessary.
3.8	Review and update plant protection procedure, specifically with regard to pest management through the use of pesticides, to apply to all forms of plant protection including rehabilitated sites and align with the requirements of EBRD PR3 (paragraphs 24-26).	Plant management.	EBRD PR	Hellas Gold	By FID +4 months.	Updated Plant protection procedure aligned with EBRD PR 3 requirements.
3.9	Prior to mining re-commencing at Mavres Petres, update the blast management plan including a pre-commencement crack survey of structures to set a baseline for planned mining activities.	Blast impact management.	GIP	Hellas Gold	Prior to mining re-commencing at Mavres Petres.	Updated blast management plan and surveys.
3.10	Maintain a greenhouse gas inventory for the Kassandra mines with respective targets.	Climate change mitigation	EBRD PR3	Hellas Gold	Annually	GHG inventory and targets.
3.11	Prepare a detailed water balance for the Project: <ul style="list-style-type: none"> <li>assessing specific water use (measured by volume of water used per unit production);</li> <li>benchmarking the operations to available industry standards and GIP of water use efficiency, and</li> <li>identify opportunities for continuous improvement in terms of water use efficiency and recovery.</li> </ul>	Water management	EBRD PR3	Hellas Gold	Annually	Water balance report

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<b>PR4</b>	<b>Health, Safety and Security</b>					
4.1	All tailings disposal facilities to be designed, constructed, operated, managed and monitored, and closed in line with GIP, e.g. ICOLD, Canadian Dam Association (CDA), Level A of MAC-TSM Tailings Management Protocol and the MAC-TSM Guide to the Management of Tailings Facilities, including general alignment with the Best Available Techniques Reference Document (BREF) for the Management of Waste from Extractive Industries.	Tailings management	EBRD PR4	Hellas Gold	Continuous	Tailings disposal facilities to be design, constructed, operated and closed in line with GIP.
4.2	Emergency Response Plan (ERP) to be updated to reflect all hazards and emergencies during construction works and include mitigation measures for all identified hazards during operations.	Mitigate risks from construction and operational hazards.	EBRD PR4	Hellas Gold	By FID + 4 months.	Updated ERP.
4.3	ERP to be updated to include a detailed Dam Failure Plan including a description of what alert/alarm systems will be established and how it will align with GIP, e.g. ICOLD, and Canadian Dam Association (CDA), Level A of MAC-TSM Tailings Management Protocol and the MAC-TSM Guide to the Management of Tailings Facilities, including general alignment with the Best Available Techniques Reference Document (BREF) for the Management of Waste from Extractive Industries	Protection of downstream land users.	EBRD PR4	Hellas Gold	By FID + 14 months.	Detailed Dam Failure Plan.
<b>PR5</b>	<b>Land Acquisition, Restrictions on Land Use and Involuntary Resettlement</b>					
5.1	Ensure landowners affected by land acquisition have restored their livelihood. If needed, define and implement livelihood restoration measures.	Risk of impoverishment of affected land owners from past land acquisition	EBRD PR5	Hellas Gold	Confirmation of livelihood restoration by FID +8 months.  Where livelihood restoration has not taken place, then implementation of additional measures to be completed by FID + 16 months.	Monitoring reports available

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<b>PR6</b>	<b>Biodiversity Conservation and Sustainable Management of Living Natural Resources</b>					
6.1	Implement the Biodiversity Management Plan (BMP) and the Biodiversity Offset Strategy (BOS), include the Biodiversity Offset Plan (BOP) to be developed)	Mitigation of impacts to biodiversity	EBRD PR6	Hellas Gold	As per schedule in BMP and BOS.	BMP and BOS (including BOP) implemented and supporting reports available.
6.2	Undertake ongoing engagement with the Forestry Department of Arnaia to implement a Forest Management Study with the aim of contributing towards the Project's biodiversity offset objectives as detailed in the BOS, and the BOP that is to be developed.	Mitigation of impacts to biodiversity	EBRD PR6	Hellas Gold	Agreement, or similar, with the Forestry Department of Arnaia on ToR by FID + 10 months (contingent on approval by the Forestry Department).  Forest Management Study by FID + 20 months.  Forest Management Plan by to be determined by Plan in discussion with EBRD based on Study.  Monitoring reports annually.	Agreed ToR with the Forestry Department of Arnaia, or documented efforts to reach agreement.  Completed Forest Management Study.  Completed Forest Management Plans.  Monitoring of implemented plans.
<b>PR10</b>	<b>Information Disclosure and Stakeholder Engagement</b>					
10.1	Implement the Stakeholder Engagement Plan (SEP) to ensure effective communication of the investment plans, potential/actual E&S impacts and mitigation measures during construction and operation to communities with a specific focus on vulnerable groups through public meetings, publications and online.  Hellas Gold to review, and update if necessary, the SEP on annual basis to ensure any new stakeholders are also engaged throughout the project lifecycle as and when necessary.	Timely and consistent engagement and information disclosure throughout Project implementation.	EBRD PR10 GIP	Hellas Gold	SEP implementation starting from ESIA disclosure	SEP implemented.  SEP tracker updated on ongoing basis with details on stakeholders identified and engaged, and consultation and disclosure activities undertaken as per the SEP with documented evidence produced, e.g. meeting minutes, registers.  SEP reviewed and updated.

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10.2	<p>Implement the community Grievance Mechanism during construction and operation.</p> <p>Hellas Gold to disclose their zero-tolerance against any form of reprisal/retaliation against Project stakeholders due to their engagement, feedback, or complaints related to the Project activities and operations.</p>	Effective management of complaints	EBRD PR 10	Hellas Gold	Throughout the Project lifecycle and from ESIA disclosure	<p>Grievance Mechanism in place.</p> <p>Grievance tracker maintained.</p> <p>Evidence of grievance close-out forms.</p>
10.3	<p>Regularly assess the crisis communication manual and align it with the principles of SEP.</p> <p>Train the relevant personnel on incident/crisis management including SEP principles and communications with media/communities/state and NGOs</p>	Reduced security and human rights risks.	EBRD PR 10 GIP	Hellas Gold	<p>Assessment of crisis communication manual – Annually.</p> <p>Identify personnel needing training on incident/ crisis management – by FID +4 months.</p> <p>Develop training material and deliver training - by FID +7 months.</p>	<p>Updated manual reflecting SEP principles.</p> <p>Training material.</p> <p>Training register.</p>
10.4	Website to be updated to reflect New Investment Plan (i.e. indicate changes already approved as well as planned changes).	Improved/ transparent information sharing with stakeholders.	GIP	Hellas Gold	By FID +4 months.	Updated website.
10.5	Environmental and Social monitoring results and progress updates on E&S management should be publicly disclosed on the Project's website and through newsletters to communities.	Improved/ transparent information sharing with stakeholders.	EBRD PR 10 GIP	Hellas Gold	Starting from FID +7 months, ongoing, as per the SEP and management plans.	<p>Environmental and Social monitoring results on website.</p> <p>Minutes of meetings with the Community of Interest Committee</p>

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10.6	<p>Establish and maintain a Community of Interest Committee (CIC) and actively engage them in implementation of project commitments (including community investment programmes) and management of grievances. Ensure women's and vulnerable groups' representation in this CIC.</p>	<p>Implementation of an ESMS that involves meaningful communication with communities affected by the Project.</p>	<p>EBRD PR 10 GIP</p>	<p>Hellas Gold</p>	<p>Engage with stakeholders in the Social area of influence to identify candidates to become members of the CIC by FID + 2 months.</p> <p>Establish the CIC with committee resolution by FID +4 months.</p> <p>Engage the CIC in regular quarterly meetings, maintain meeting registers and minutes starting from FID +7 months.</p>	<p>Committee resolution.</p> <p>Meeting register.</p> <p>Meeting minutes.</p>
10.7	<p>Develop and implement a Corporate Social Responsibility (CSR) strategy and a Community Investment Plan (CIP) in a participatory manner with active participation of CIC members, Project affected people and local authorities based on a robust needs assessment study.</p> <p>CIP budget and activities shall be disclosed with the public on a regular basis. Ensure that the monitoring of CSR outcomes are defined in the CIP and the CSR strategy is integrated into the mine closure plan.</p> <p>The CSR strategy and CIP should be developed and implemented by project staff/external experts with appropriate expertise and experience in developing community investment programmes.</p>	<p>Establishing and delivering appropriate and sustainable community benefits.</p>	<p>GIP</p>	<p>Hellas Gold</p>	<p>Complete engagement with relevant stakeholders to define priorities and activities for the CIP by FID +4 months.</p> <p>Develop CIP and disclose to stakeholders by FID +7 months.</p>	<p>CSR strategy and CIP.</p> <p>Records of engagement.</p>