



eldorado gold

Eldorado Gold

Social Performance Policy

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I. Introduction

Eldorado Gold Corporation (“Eldorado”) is committed to incorporating sustainability from the ground up, as articulated in our Sustainability Framework. We are committed to working with our communities in a spirit of mutual respect to grow local economies and deliver lasting opportunities.

II. Purpose

The purpose of this policy is to articulate Eldorado’s social performance commitments; the Company’s expectations of our employees and contractors; and our commitment to engaging with stakeholders affected by our operations, in support of our Sustainability Framework.

III. Scope

Our Social Performance Policy and management approach has been informed by the following international frameworks:

- World Gold Council Responsible Gold Mining Principles
- The Mining Association of Canada’s *Towards Sustainable Mining* Guiding Principles, Frameworks, Protocols and associated guidance
- United Nations Declaration on the Rights of Indigenous Peoples
- International Finance Corporation Performance Standard 5: Land Acquisition and Involuntary Resettlement

Our Sustainability Integrated Management System (“SIMS”) establishes company-wide sustainability requirements aligned with these frameworks to ensure consistent application and adherence across all operations. All employees and contractors are expected to adhere to this Social Performance Policy and associated requirements in SIMS.

Eldorado is committed to:

1. Maintaining systems and regularly conducting due diligence and risk and impact assessments to identify, assess, prioritize and avoid or mitigate potential and actual adverse social impacts, and seek to periodically update our assessments and make them accessible to affected communities.
2. Listening to and engaging regularly and in good faith with stakeholders to understand their interests and concerns and integrate this knowledge into how we do business, with the aim of obtaining and sustaining their broad-based support and identifying opportunities for continuous improvement.
3. Engaging with community members, including traditional leaders, in a culturally appropriate manner, and being alert to negative impacts on women, children, Indigenous Peoples and other potentially vulnerable or marginalised groups. We will seek to include the voices of these groups and integrate this knowledge into how we do business.

4. Establishing fair, accessible, effective and timely mechanisms through which complaints and grievances related to our activities can be raised by our stakeholders and resolved without risk of discrimination or retaliation.
5. Working with local authorities and community leaders to manage the impact of any migratory influxes of people attracted by mine development where feasible and seek to avoid involuntary resettlement. Where this is unavoidable, we will meaningfully consult affected communities, and offer fair and timely compensation commensurate with national regulations or industry best practice, whichever is more stringent.
6. Seeking to preserve cultural heritage from adverse impacts associated with project activities, including through our impact assessments, and monitoring for chance finds of objects of potential significance recovered during any site work.
7. Enabling communities associated with our operations to be consulted and offered meaningful opportunities to benefit from our presence, including through equitable access to jobs, training, procurement and contracting opportunities.
8. Providing community investments in consultation with local communities, civil society organizations and local governments where possible, in support of local, national and international priorities, including the United Nations Sustainable Development Goals.

IV. Reporting

Eldorado is committed to communicating this policy to internal and external stakeholders, and publicly reports social performance information on an annual basis through the following mechanisms:

- Corporate sustainability report prepared in accordance with the voluntary Global Reporting Initiative (GRI) standards (Core option) and Sustainability Accounting Standards Board (SASB) Metals and Mining Standard
- Responsible Gold Mining Principles report, including company conformance and third-party assurance, and
- United Nations Global Compact Communication on Progress.

Reporting mechanisms are selected to ensure disclosures are transparent, well-organized and support our Sustainability Framework. Review of new or evolving reporting mechanisms is undertaken annually, at a minimum, to ensure our approach remains fit for purpose.

V. Governance and Accountability

The Sustainability Committee of the Board provides oversight of Company policies and strategies in the areas of environment, tailings management, climate change, health and safety, social performance, human rights and security. Ultimate accountability for social, environmental and health and safety performance rests with our President & Chief Executive Officer, while the Executive Vice President and Chief Strategy Officer and Executive Vice President and Chief Operating Officer have oversight at the corporate level. Responsibility for ensuring adherence to the requirements of this Policy is assigned to the General Manager of each project and operation.

VI. Monitoring and Non-Compliance

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

VII. Contacts

The Director, Sustainability is responsible for establishing and maintaining this Policy. The Policy is approved by the President & CEO.

VIII. Document Control

Version	Author	Approval	Approval Date
1.0	Jennifer Prospero	George Burns	February 24, 2022