

HUMAN RIGHTS POLICY

Eldorado Gold Corporation (“Eldorado”) is committed to incorporating sustainability from the ground up, as articulated in our Sustainability Framework. We are focused on respecting human rights and delivering conflict-free, responsibly sourced gold, while supporting local governments to protect human rights and prevent human rights abuses.

Purpose

The purpose of this policy is to articulate Eldorado’s human rights 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.

Scope

Our Human Rights Policy and management approach has been informed by the following international frameworks:

- The International Bill of Rights
- The International Labour Organization’s Declaration on Fundamental Principles and Rights at Work
- The United Nations Guiding Principles on Business and Human Rights
- The United Nations Declaration on the Rights of Indigenous Peoples
- The Ten Principles of the United Nations Global Compact
- The Voluntary Principles on Security and Human Rights
- The Mining Association of Canada’s Towards Sustainable Mining Guiding Principles, Frameworks, Protocols and associated guidance
- World Gold Council Responsible Gold Mining Principles
- World Gold Council Conflict-Free Gold Standard

Our Sustainability Integrated Management System (“SIMS”) establishes company-wide sustainability requirements aligned with these international frameworks to ensure consistent application and adherence across all operations.

Eldorado is committed to respecting human rights as outlined in this Policy, the Supplier Code of Conduct, and Code of Business Conduct and Ethics. Human rights considerations are to be integrated into Eldorado’s standard business practices.

All employees and contractors are expected to adhere to this Human Rights Policy and associated requirements in SIMS. Employees and contractors are expected to recognize human rights violations and be aware of the mechanisms in place to report human rights concerns and violations.

Eldorado is committed to:

1. Respecting all human rights as defined in the International Bill of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. We will seek to conduct business in a manner that does not cause, and is not complicit in, human rights abuses either directly or through our business relationships.
2. Respecting the rights of our workforce to a safe, healthy and respectful workplace, and the rights of local community members and all stakeholders with whom we interact. We expect our business partners, including security providers, contractors and suppliers, to share this commitment to rights, including those in regard to safe workplaces, freedom of association, freedom of speech, collective bargaining, maximum working hours, fair wages and benefits, equal opportunity and freedom from discrimination.
3. Complying with all applicable legal and regulatory requirements in the countries that we operate, and other internal requirements, including SIMS.
4. Regularly reviewing changing conditions in the jurisdictions where we operate, and conducting impact assessments and due diligence to identify, assess and manage human rights risks associated with our activities with the intention of preventing and mitigating adverse impacts.
5. Not discriminating against any individual on the basis of race, gender identity, religion, age, social status, sexual orientation or any other characteristic unrelated to the individual’s job performance.
6. Not tolerating disrespectful or inappropriate behaviour, harassment, intimidation or unfair treatment, or retaliation of any kind by our employees or those of our suppliers and business partners.
7. Respecting the human rights of individuals who require particular attention, including women, children, Indigenous Peoples and other potentially vulnerable or marginalized groups.
8. Respecting the collective and customary rights, interests, culture and connection to the land of directly affected Indigenous Peoples, if present in the area of influence. We acknowledge the rights of Indigenous Peoples and strive to positively contribute to reconciliation by engaging in good faith with these communities through a formal engagement plan throughout the mining life cycle. We will work to obtain their free, prior and informed consent before proceeding with development and throughout the life of the project.
9. Prohibiting child labour, forced labour, human trafficking, and modern slavery in our operations and in our supply chains, and supporting the elimination of all forms of child and forced labour, by establishing processes to control, identify and in some cases, remedy risks of child and forced labour through direct engagement and using a risk-based approach.
10. Managing security-related human rights risks through implementation of the Voluntary Principles on Security and Human Rights.
11. Not causing, supporting, benefiting from or contributing to unlawful armed conflict, human rights abuses or breaches of international humanitarian law.
12. Establishing fair, accessible, effective and timely grievance mechanisms through which human rights concerns can be raised by our stakeholders and resolved without risk of discrimination or retaliation.
13. Training our employees and contractors on human rights, forced and child labour, and ensuring security providers are trained on the Voluntary Principles on Security and Human Rights to promote responsible practices and safeguard the rights of stakeholders and Indigenous communities.
14. Conducting monitoring with regular audits and reviews of our operations, as well as due diligence on contractors and suppliers to identify and address risks related to child labour, forced labour, modern slavery, unfair remuneration practices, and international sanctions, and to uphold our human rights standards.