

SOCIAL PERFORMANCE POLICY



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.

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.

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
- European Bank for Reconstruction and Development (EBRD) Performance Requirement 5: Land acquisition, involuntary resettlement and economic displacement.

This policy guides us in operating in a socially responsible and transparent manner through all stages of the mining lifecycle. 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 with participation of affected communities.
2. Identifying relevant stakeholders and Indigenous communities to achieve an understanding of the social, cultural, economic and political context, and to create corresponding management plans. Implementing effective stakeholder engagement practices to support development and maintenance of meaningful relationships with stakeholders and Indigenous communities, to gain mutual understanding of viewpoints, to build effective relationships, to create sustainable shared value and mutual benefits, and to transparently inform them of company activities and performance.
3. 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.

4. Complying with all applicable legal and regulatory requirements in the countries that we operate, and other internal requirements, including SIMS.
5. Establishing and tracking progress towards social performance objectives and targets to maintain stakeholder trust, including with Indigenous communities, and deliver continuous improvement.
6. 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.
7. Establishing fair, accessible, effective and timely processes to receive, track and respond to incidents, concerns, grievances and feedback related to our activities from stakeholders, including Indigenous communities and organizations, leading towards stronger relationships and building trust so that issues can be raised by our stakeholders and resolved without risk of discrimination or retaliation.
8. 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.
9. Respecting the tangible and intangible cultural heritage of communities and Indigenous peoples and ensuring that site-level formal cultural heritage management plans are designed in consultation with relevant key stakeholders including Indigenous Peoples.
10. 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. Creating sustainable value in communities where we operate by striving to hire employees and procure goods and services locally, wherever reasonably possible, through formal plans and strategies while also striving to uphold equitable, merit-based hiring processes that welcome diverse candidates.
11. Making community investments that are strategic in nature and carried out in partnership with local communities, governments, and development organizations, particularly those that intersect with Eldorado’s core competencies and business needs.
12. Planning for closure in a socially responsible and transparent manner by developing Closure Plans that consider legal and operational requirements, community engagement, socio-economic impacts, and post-closure land use.