

Responsible Sourcing Policy

October 2025



Responsible Sourcing Policy

Eldorado Gold Corporation (“Eldorado”) is committed to incorporating sustainability from the ground up, as articulated in our Sustainability Framework. We commit to conducting risk-based due diligence on our suppliers to support a healthy environment and respect for labour and human rights, and compliance with our policies and applicable regulations. We will take appropriate measures to identify, assess and mitigate actual and potential adverse impacts arising from our operations and those of our suppliers.

1. Purpose

This policy articulates Eldorado’s commitment to responsible sourcing, the company’s expectations of its employees, suppliers, and contractors. It should be read alongside the expectations and commitments outlined in Eldorado’s Supplier Code of Conduct, as well as any specific policies of Eldorado referenced in the Supplier Code of Conduct or in contractual provisions agreed between Eldorado and a supplier.

The policy applies to all of Eldorado’s operations and companies over which Eldorado has control over the majority of the voting rights. Each company with which Eldorado conducts business with is expected to adopt and implement comparable and adequate sector-specific standards.

2. Scope

The following international frameworks and regulations have informed our Responsible Sourcing Policy and management approach:

- United Nations Guiding Principles on Business and Human Rights
- OECD Guidance for Responsible Business Conduct
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- European Union Directive (EU) 2024/1760 - Corporate Sustainability Due Diligence Directive

3. Commitment

Eldorado is committed to:

- 3.1 Maintain internal management systems to support supply chain due diligence. This includes assigning authority and responsibility to competent senior staff to oversee the process, assigning sufficient resources, establishing communication processes, and conducting training to employees and suppliers when appropriate.
- 3.2 Strengthen company engagement with suppliers. Aim to build long-term relationships and consider how to support suppliers’ capabilities. We communicate our responsible sourcing expectations to our suppliers and incorporate them into our commercial contracts.
- 3.3 Identify, and assess any risk and adverse impact in our supply chain on an ongoing basis and develop and implement risk management plans as outlined in 3.6. Suppliers must comply with our Supplier Code of Conduct.
- 3.4 Conduct enhanced human rights and environmental risk assessments, following a risk-based approach and prioritising high-risk areas and sectors of the supply chain. Communicate high-risk findings to senior management.
- 3.5 Receive and follow up on grievances. Complaints and grievances can be made as outlined in our Code of Ethics and Business Conduct or in the Supplier Code of Conduct.
- 3.6 Develop and implement risk management plans or other suitable measures when human rights or environmental risks or impacts have been identified.

- 3.6.1 Constructively engage suppliers to cease, prevent, and mitigate adverse impacts. This may include conducting capacity building for suppliers.
- 3.6.2 Prioritise activities that prevent adverse impacts whenever possible and feasible.
- 3.6.3 We view suspension or termination of a relationship as a measure of last resort, undertaken only after attempts at improvement have failed or where we identify a reasonable risk of any of the following zero-tolerance risks occurring:

Serious human rights abuses such as torture, cruel treatment, forced labour, child labour, sexual violence, violation of international law (including sanctions) or other gross human rights violations and direct or indirect support of non-state armed groups.

- 3.7 Provide remediation when appropriate. Eldorado will determine, in its discretion, the type of appropriate remediation based on the nature and extent of the adverse impact, the degree to which Eldorado contributed to the adverse impact, if any, and any other relevant or extenuating circumstances.
- 3.8 Monitor and regularly verify the effectiveness of our due diligence efforts to continuously improve our approach to due diligence and ensure it remains applicable to the evolving risks in our supply chain.
- 3.9 Publicly report on our due diligence practices and activities on an annual basis.

4. Our Third-Party Risk Management Framework

Eldorado has developed a third-party risk management framework (TPRM) to implement our responsible sourcing commitments effectively. The TPRM framework involves all suppliers undergoing an initial risk screening. Suppliers identified as having heightened risks, based on a risk matrix that considers factors such as location and sector, will be required to complete enhanced due diligence questionnaires. The review of this information determines whether additional risk management efforts are necessary. The risk screening will be reviewed on an annual basis.

The TPRM framework will be implemented in phases and continuously reviewed and refined.

5. Approval and review

This policy is reviewed annually.

Approved by the Chief Executive Officer, November 2025

Document Control

Version	Approver Name	Approver Title	Approval Date	Note
1.0	George Burns	Chief Executive Officer	November 20, 2025	