

# RESPECTFUL WORKPLACE POLICY

Eldorado Gold Corporation (“Eldorado”) is committed to providing a safe work environment – physically and psychologically – for all people that is free from harassment, discrimination, and workplace violence in any form at work.

## Purpose

The purpose of our Respectful Workplace Policy (“Policy”) is to articulate Eldorado’s commitments and expectations for a physically and psychologically safe work environment where all employees, directors, officers, contractors, consultants, and suppliers engaged on Eldorado’s behalf (“individuals”) are treated with respect, decency, and dignity, and where harassment, discrimination, and workplace violence in all forms are prohibited. As such, all individuals are responsible for adhering to this Policy. Eldorado adopts a zero-tolerance approach towards any form of harassment, discrimination, and workplace violence, treating all incidents seriously and promptly investigating all allegations.

Harassment, discrimination, and workplace violence are defined as follows:

- **Harassment:** Any single or repeated series of intentional or unintentional inappropriate conduct (comments, bullying/cyber-bullying, or action) by a person towards a worker that the person knew or reasonably ought to have known would create a psychological power imbalance because they are intimidating or abusive, and cause stress, anxiety, and/or fear, including sexual harassment.
- **Discrimination:** Any intentional or unintentional conduct, based upon protected grounds relating to personal characteristics of the individual or group, which has the effect of imposing burdens, obligations, or disadvantages on such individual or group not imposed upon others, or which withholds or limits access to opportunities, benefits, and advantages available to other members of society.
- **Workplace Violence:** An event or series of events occurring at the work site or in the presence of coworkers that cause a person to fear for their physical safety, whether actual or threatened physical harm has occurred.

These definitions do not include any reasonable action taken by an employer or leader relating to the management and direction of an individual during their employment.

## Scope

This policy applies globally to all employees employed by Eldorado Gold and all subsidiaries, and any other entities controlled by Eldorado.

In addition to legislative requirements of each jurisdiction, this Policy and supporting practices are further 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 minimum sustainability requirements aligned with these international frameworks to ensure consistent application and adherence across all operations.

## Individual Responsibilities

1. Eldorado’s employees, directors, and officers shall adhere to this Policy and its commitment to maintaining a workplace where people are treated with respect, decency, and dignity, in addition to Eldorado’s Code of Ethics & Business Conduct, Anti-Bribery and Corruption Policy, Human Rights Policy, applicable local policies, procedures, applicable legislation and regulations, and applicable rules including internal work regulations while engaging in Eldorado business or on Eldorado premises. Eldorado will strive to ensure that consultants, contractors, and suppliers working on behalf of Eldorado do the same.
2. Any individual that experiences or witness instances of harassment, discrimination, and/or workplace violence is expected to use the formal mechanisms in place to report concerns.

3. Any individual involved in an investigation, whether as a respondent, complainant, or witness, is expected to uphold confidentiality.
4. It is the individual’s responsibility to read and understand this Policy and stay abreast of updates to it while engaged in work with Eldorado.

## Leadership Responsibilities

Individuals with leadership, managerial and supervisory responsibilities shall:

1. Have a heightened responsibility to monitor the work environment and take all necessary action to prevent and stop behavior that is counter to the aims of a respectful workplace.
2. Be responsive and supportive to any individual who reports instances of harassment, discrimination, and/or workplace violence.
3. Handle violations of this Policy by escalating for investigation, following related local procedures, maintaining confidentiality during the investigation process, supporting the investigation process, implementing corrective actions, and ensuring no retaliation towards anyone involved.
4. Monitor the situation after the resolution of the complaint, including any required follow up and implementation of corrective actions as determined by the outcome of the investigation.

## Eldorado Responsibilities

Eldorado’s commitments include:

1. Eldorado will maintain, update, and promote this Policy, including raising awareness and understanding among all individuals.
2. Eldorado will report any instances of harassment, discrimination, and workplace violence to the appropriate government authority, where required.
3. Eldorado shall not make employment decisions based on personal characteristics (such as gender, Gender Identity, Gender Expression, race, nationality, ethnicity, social status and Indigenous origin, religion or religious belief, disability, age, or sexual orientation) unrelated to requirements of the job.
4. Eldorado shall not discriminate against any individual based on race, Gender Identity, Gender Expression, religion, nationality, ethnicity, age, social status, sexual orientation or any other characteristic unrelated to the individual’s job performance.
5. Eldorado shall make reasonable accommodations based on an employee’s disability or religion or other protected category based on applicable national and local legislation.
6. Eldorado will establish fair, accessible, effective, and timely channels through which individuals can report any form of harassment, discrimination, and/or workplace violence.
7. Eldorado will adopt a zero-tolerance approach towards any form of harassment, discrimination, and workplace violence, while conducting company business, at company functions, or social events, and will treat all incidents seriously and promptly investigate all allegations.
8. Eldorado will strive to maintain confidentiality except to the extent necessary to conduct a fair and thorough investigation and permitted by law to protect individuals from no adverse consequences.
9. Eldorado will take appropriate corrective action if employees engage in any form of harassment, discrimination, and/or workplace violence. Corrective actions taken will comply with applicable legislation, labor agreement, and collective bargaining agreements.
10. Eldorado commits to keeping all parties alleging violation of this Policy, or responding to an alleged violation of this Policy, informed regarding the process being followed by Eldorado and the outcome of that process.

Approved by the Board July 28, 2022