



eldorado gold

---

Eldorado Gold

# 2020 Conflict-Free Gold Report

# Executive Summary

Headquartered in Vancouver, Canada, Eldorado Gold Corporation (“Eldorado”) is a Canadian mid-tier gold producer listed on the Toronto (TSX: ELD) and New York (NYSE: EGO) stock exchanges.

Over Eldorado’s 28 years of experience in the mining industry, we have focused on producing sustainable value for our stakeholders through a low-cost strategy, a highly-skilled and dedicated workforce, and safe and responsible operations.

As a fundamental aspect of responsible mining and an example of our values in action, the gold we produce has been extracted in a manner that does not cause, support or benefit unlawful armed conflict, does not contribute to human rights abuses, and is not in breach of international humanitarian law.

We adopted the World Gold Council’s *Conflict-Free Gold Standard* (“the Standard”) in January 2013 in order to provide assurance to all of our stakeholders that we act upon this responsibility.

This Conflict-Free Gold Report (“the Report”) summarizes how Eldorado conforms to the requirements of the Standard for the reporting period of January 1, 2020 to December 31, 2020. Eldorado’s five producing mines in Turkey, Canada and Greece are not considered to be in “high-risk” or “conflict-affected” areas of the countries in which we operate, and are in conformance with the Standard.

Our Executive Vice President & Chief Operating Officer is responsible for the Standard’s implementation and for Eldorado’s ongoing compliance. An independent assurance provider has reviewed and assured our compliance with the Standard.



# Where We Operate

## Canada

**Lamaque** 

**Commodities:** Gold  
**2020 Production:** 144,141 oz  
**Ownership:** 100%  
**2P Reserves:** 1.1 Moz Au

## Romania

**Certej** 

**Commodities:** Gold, Silver  
**Ownership:** 80.5%  
**2P Reserves:** 2.4 Moz Au, 15.6 Moz Ag

## Our In-country Offices

- Athens, Greece
- Deva, Romania
- Ankara, Turkey

## Greece

**Kassandra Mines**

**Stratoni** 

**Commodities:** Silver, Lead, Zinc  
**2020 Production:** 44,382 Tonnes of Concentrate Produced  
**Ownership:** 100%  
**2P Reserves:** 2.6 Moz Ag, 34 Kt Pb, 52 Kt Zn

**Olympias** 

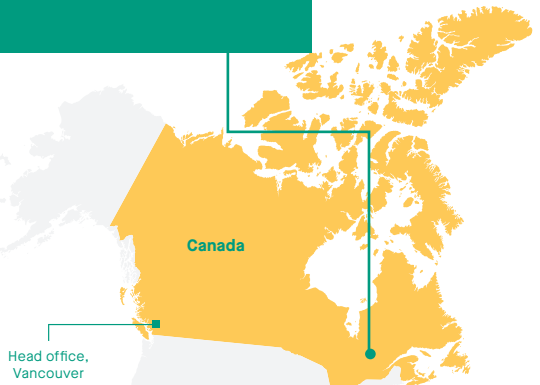
**Commodities:** Gold, Silver, Lead, Zinc  
**2020 Au Production:** 58,423 oz  
**Ownership:** 100%  
**2P Reserves:** 2.2 Moz Au, 41.1 Moz Ag, 426 Kt Pb, 533 Kt Zn

**Skouries <sup>(2)</sup>** 

**Commodities:** Gold, Copper  
**Ownership:** 100%  
**2P Reserves:** 3.8 Moz Au, 779 Kt Cu

**Perama Hill <sup>(2)</sup>** 

**Commodities:** Gold, Silver  
**Ownership:** 100%  
**2P Reserves:** 1.2 Moz Au, 2.7 Moz Ag



Head office, Vancouver

European regional office, Amsterdam



Eldorado also holds 100% ownership of the following asset:

**Sapes deposit** – A high-grade epithermal gold deposit located in northeastern Greece, near Eldorado's Perama Hill project.

## Turkey

**Efemçukuru** 



**Commodities:** Gold  
**2020 Production:** 99,835 oz  
**Ownership:** 100%  
**2P Reserves:** 613 Koz Au

## Kışladağ

**Kışladağ** 

**Commodities:** Gold  
**2020 Production:** 226,475 oz  
**Ownership:** 100%  
**2P Reserves:** 4.6 Moz Au

## Legend

-  Operating Mines
-  Development Projects
-  Construction Projects

### Notes:

- (1) Mineral reserves and mineral resources are as of September 30, 2020.
- (2) Skouries and Perama Hill are currently on care and maintenance.

# The Conflict-Free Gold Standard

The World Gold Council published the Standard in October 2012 following extensive consultation with governments, civil society, external auditors and supply chain participants.

The Standard resulted from a recognition by stakeholders and interested parties that state and non-state actors can use gold to fund illegal conflict and human rights abuses due to its highly concentrated value. The Standard therefore sets a framework for assurance that gold is not contributing to conflict, violations of international humanitarian law, or human rights abuses, and “operationalizes” the OECD’s Due Diligence Guidance for Responsible Supply Chains for Minerals from Conflict-Affected and High-Risk Areas.

For more information and to obtain a copy of the Standard, please visit: [www.gold.org/who-we-are/our-members/responsible-gold/conflict-free-gold-standard](http://www.gold.org/who-we-are/our-members/responsible-gold/conflict-free-gold-standard)

## The Standard’s Requirements

The Standard sets out a series of risk assessment and disclosure requirements intended to a) identify any operations that may have the potential to contribute to conflict, and b) show that steps have been taken to mitigate against the potential for the production of gold to contribute to conflict if operations are in “high-risk” areas.

Part A of the Standard requires companies to a) assess whether they are adhering to any applicable international sanctions and b) to undertake a risk assessment based upon the presence of recognized conflict in the regions in which they operate. The Heidelberg Institute for International Conflict Research’s annual *Conflict Barometer* is used to assess the level of conflict at national and sub-national levels around the world. Operations that are located in a sub-national area ranked as level 5 (war) or level 4 (limited war) during the reporting period or within the previous two years have been classified as “conflict-affected or high-risk”, in which case the company must therefore complete the remaining assessments in Parts B-E of the Standard. For operations not considered to be located in “high risk” or “conflict affected” areas, or where the company has transferred custody of the gold during the transportation process, the remaining assessments are Parts D and E of the Standard.

## Reporting Parameters

This Conflict-Free Gold Report includes all mining and processing operations over which Eldorado has direct control (Appendix A) and which produced gold during the 2020 reporting year. This is consistent with the reporting boundaries that Eldorado has publicly disclosed in its *2020 Sustainability Report*.

This Report does not include exploration or any sites that are currently not producing gold or gold-bearing materials.



Lamaque, Canada

## Conforming to the Conflict-Free Gold Standard

This Conflict-Free Gold Report marks Eldorado’s eighth year of conformance with the Standard. Our continued conformance with the Standard assures us as well as our stakeholders that our operations are Conflict-Free.

# Eldorado's Evaluation

## Part A – Conflict Assessment

Per Part A of the Standard, Eldorado conducted a review of international sanction databases including, but not limited to, the United Nations Security Council, the European Union sanctions database, Global Affairs Canada, and the U.S. Department of State database. We also reviewed independent assessments published in the 2013, 2014, 2015, 2016, 2017, 2018, 2019 and 2020 Heidelberg Institute for International Conflict Research's annual *Conflict Barometer*. Finally, we referred to our previous Conflict-Free Gold Standard assessments.

Following our 2020 assessment, we concluded that there were no applicable international sanctions imposed on the countries where we operated during the 2020 year (Turkey, Canada, Greece, Brazil and Romania).

Our review of the Heidelberg Conflict Barometer found that high intensity (level 4 – limited war) conflict had occurred in Turkey during the 2020 year. Through a regional analysis of the Heidelberg Conflict Barometer, Turkey experienced “limited war” in the country's southeastern regions.

In Turkey, a number of violent conflicts and military actions related to fighting between the Kurdistan Workers' Party (PKK) and the Turkish government were categorized as “limited war” in 2020, as airstrikes were conducted by Turkish forces on PKK forces. Conflicts to which Turkey was a party were concentrated in the country's southeastern provinces and in Syria and Iraq. Eldorado's Kışladağ and Efemçukuru mines are located within the western provinces of Üsâk and İzmir respectively. The provinces experienced “No Conflict” in 2020 and are not in close proximity to the “limited war” within Turkish territory. We therefore conclude that our Turkish operations are not conflict-affected.

No other Eldorado operations or regions through which we transport gold and gold-bearing material were determined to be in close proximity to conflict. As such, we conclude that Eldorado has no mines considered to be in “conflict-affected” or “high-risk” areas.

## Part B – Company Assessment & Part C – Commodity Assessment

Based on the results of Eldorado's Part A: Conflict Assessment, further assessments of Parts B and C were not required for any of our operations due to the absence of high intensity conflict and security risks at each of our sites.

## Part D – Externally Sourced Gold

Eldorado complies with Part D of the Standard as we do not accept source gold or gold-bearing materials from third parties.

## Part E – Management Statement of Conformance

Eldorado has produced appropriate Management Statement's of Conformance documentation, which have been signed by the General Managers at each of our sites for the January 1, 2020 to December 31, 2020 period, as referenced in Appendix A. We have included within this report a consolidated Management statement of Conformance, signed by Eldorado's Executive Vice President & Chief Operating Officer, to act as formal representation to the next participant in the chain of custody as required in Part E: Management Statement of Conformance.

We are not aware of any deviations from conformance with the Standard that arose during the reporting period.

We conclude that Eldorado was in conformance with the criteria set out in the Conflict-Free Gold Standard for the reporting year January 1, 2020 to December 31, 2020.

Supporting documentation to this Report includes:

1. Eldorado's 2013, 2014, 2015, 2016, 2017, 2018 and 2019 Conflict-Free Gold Reports: [www.eldoradogold.com/responsibility/our-approach/accountability/](http://www.eldoradogold.com/responsibility/our-approach/accountability/)
2. Eldorado's Code of Business Conduct & Ethics [www.eldoradogold.com/about-us/governance/](http://www.eldoradogold.com/about-us/governance/)
3. Eldorado's 2020 Sustainability Report [www.eldoradogold.com/responsibility/reporting/](http://www.eldoradogold.com/responsibility/reporting/)
4. Eldorado's Governance Policies: [www.eldoradogold.com/about-us/governance/](http://www.eldoradogold.com/about-us/governance/)

## Contact Us

Should you wish to provide any feedback to Eldorado with respect to this Conflict-Free Gold Report, please e-mail [sustainability@eldoradogold.com](mailto:sustainability@eldoradogold.com) or leave a comment at [www.eldoradogold.com/contact-form/](http://www.eldoradogold.com/contact-form/)

## Independent Assurance

Eldorado engaged the services of PricewaterhouseCoopers LLP (“PwC”) to provide independent limited assurance in relation to Eldorado's conformance with the Standard. PwC's assurance report is available in Appendix B.

## Management Statement of Conformance

Eldorado Gold Corporation (“Eldorado”), based in Vancouver, Canada, confirms that, to the best of our knowledge, all gold and gold-bearing material produced by our sites listed in Appendix A, is not causing, supporting or benefitting unlawful armed conflict, contributing to serious human rights abuses or breaching international humanitarian law as per the World Gold Council’s *Conflict-Free Gold Standard* (“the Standard”).

Eldorado confirms our mines listed in Appendix A have appropriate systems and processes in place to ensure that all gold and gold-bearing material leaving our operations’ area of control is being dispatched in conformance with the Standard.

In accordance with Part D (Externally Sourced Gold Assessment) of the Standard, Eldorado confirms that our mines listed in Appendix A do not accept or externally source gold or gold-bearing materials from third parties.

The World Gold Council’s Conflict-Free Gold Standard was published in 2012 and implemented by Eldorado on January 1, 2013. This Management Statement of Conformance covers the period of January 1, 2020 to December 31, 2020. This is Eldorado’s seventh Conflict-Free Gold Report, which discloses Eldorado’s conformance to the Standard and that Eldorado has obtained independent limited assurance in accordance with the Standard. Re-assessments will be undertaken annually or as required by the Standard.

This Management Statement of Conformance is provided by Eldorado as part of our adherence to the World Gold Council’s *Conflict-Free Gold Standard* and acts as a formal representation to the next participant in the chain of custody.

Eldorado’s 2019 Conflict-Free Gold Report and independent assurance statement can be viewed on our website at [www.eldoradogold.com/responsibility/our-approach/accountability](http://www.eldoradogold.com/responsibility/our-approach/accountability)



**Joe Dick**

Executive Vice President & Chief Operating Officer,  
Eldorado Gold Corporation  
December 10, 2021



## Appendix A

Eldorado's Conflict-Free Gold Report and the conclusions expressed therein represents the conformance of the following operations to the *Conflict-Free Gold Standard*:

Our Operating Mines:

- Kışladağ Mine in Üsâk Province, Turkey
- Efemçukuru Mine in Izmir Province, Turkey
- Olympias Mine in Halkidiki Region, Greece
- Lamaque Mine in Quebec, Canada

The Report does not include Eldorado's base metal assets, exploration or other development stage projects as these sites did not produce gold or gold-bearing materials in 2020.



# Appendix B

## Independent Limited Assurance Report

### To the Directors of Eldorado Gold Corporation

We have undertaken a limited assurance engagement on the Conflict-Free Gold Standard Report (subject matter information) of Eldorado Gold Corporation during the period from January 1, 2020 to December 31, 2020, as hosted on Eldorado Gold Corporation's website.<sup>1</sup>

### Management's responsibility

Management is responsible for preparation of the subject matter information in accordance with the World Gold Council's Conflict-Free Gold Standard (the criteria), developed by the World Gold Council, dated October 2012. Management is also responsible for such internal control as management determines necessary to enable the preparation of the Report that is free from material misstatement.

### Our responsibility

Our responsibility is to express a limited assurance conclusion on the subject matter information based on the evidence we have obtained. We conducted our limited assurance engagement in accordance with the International Standards on Assurance Engagements (ISAE) 3000, *Attestation Engagements Other Than Audits or Reviews of Historical Financial Information*. This standard requires us to conclude whether anything has come to our attention that causes us to believe that the subject matter information is not fairly stated, in all material respects.

A limited assurance engagement involves performing procedures (primarily consisting of making inquiries of management and others within the entity, as appropriate, and applying analytical procedures) and evaluating the evidence obtained. The procedures are selected based on our professional judgment, which includes identifying areas where the risks of material misstatement in preparing the subject matter information in accordance with the criteria are likely to arise.

Our limited assurance procedures included, but were not limited to the following:

- Making enquiries of management to obtain an understanding of the overall governance and internal control environment for the development of the Conflict-Free Gold Standard Report;
- Obtained and reviewed management methodology documents for adherence to the Conflict-Free Gold Standard (Reporting boundaries for the Conflict-Free Gold Report, Part A conflict-assessment, Part D Externally Sourced Gold Assessment and Part E Management Statement of Conformance); and
- Performed limited sample testing over the integrity of underlying information of management's documents.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement and, consequently, the level of assurance obtained is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

### Our independence and quality control

We have complied with the relevant rules of professional conduct/code of ethics applicable to the practice of public accounting and related to assurance engagements, issued by various professional accounting bodies, which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

The firm applies Canadian Standard on Quality Control 1, *Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance Engagements* and, accordingly, maintains a comprehensive system of quality control, including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

### Conclusion

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that Eldorado's subject matter information prepared in accordance with the criteria during the period from January 1, 2020 to December 31, 2020, is not fairly stated, in all material respects.

### Purpose of statement and restriction of use and distribution

The subject matter information has been prepared to report Eldorado Gold Corporation's compliance with the World Gold Council's Conflict-Free Gold Standard. As a result, the subject matter information may not be suitable for another purpose. Our report is intended solely for the use of Eldorado Gold Corporation in reporting their compliance with the World Gold Council's Conflict-Free Gold Standard.

We neither assume nor accept any responsibility or liability to any third party, including the World Gold Council, in respect of this report.

*PricewaterhouseCoopers LLP*

### Chartered Professional Accountants

Vancouver, British Columbia  
December 10, 2021

<sup>1</sup> "PwC" refers to PricewaterhouseCoopers LLP, an Ontario limited liability partnership.

<sup>1</sup> The maintenance and integrity of Eldorado Gold Corporation's website is the responsibility of Eldorado Gold Corporation; the work carried out by PricewaterhouseCoopers LLP does not involve consideration of these matters and, accordingly, PricewaterhouseCoopers LLP accepts no responsibility for any changes that may have occurred to the reported information or criteria since they were posted on the website.



# Corporate Information

## Canada (Head Office)

Eldorado Gold Corporation  
11th Floor, 550 Burrard Street  
Vancouver, BC, Canada V6C 2B5

**Tel:** +1 604 687 4018

**Fax:** +1 604 687 4026

**Toll-free:** +1 888 353 8166

## Canada (Quebec)

Eldorado Gold Quebec  
300, 3e Avenue Est  
Val-d'Or, QC J9P 0J6 Canada

**Tel:** +1 819 874 3100

**Fax:** +1 819 874 0051

## Turkey

Tüprag Metal Madencilik  
Sanayive Ticaret A.S.  
Iran Caddesi  
Turan Emeksiz Sok. No. 1  
06700 Gaziosmanpasa  
Ankara Turkey

**Tel:** +90 312 468 4536

**Fax:** +90 312 468 2646

## Greece

Hellas Gold SA & Thracean  
Gold Mining SA  
23A Vasilissis Sofias Avenue  
Athens  
10674 Greece

**Tel:** +30 214 687 0000

**Fax:** +30 214 687 0095

## Romania

Deva Gold SA  
No. 9 Dragos Voda Street  
BL. 28, SC. A-B  
Deva, Hunedoara County  
330034 Romania

**Tel:** +40 25 423 3680

**Fax:** +40 25 423 3682

## Barbados

Eldorado Gold (Barbados) Limited  
White Park House  
White Park Road  
Bridgetown  
BB11135 Barbados

**Tel:** +1 246 271 5357

**Fax:** +1 246 271 5357

## The Netherlands

Eldorado Gold (Netherlands) BV  
Barbara Strozziilaan 101  
1083 HN, Amsterdam  
The Netherlands

**Tel:** +31 204 509 610

**Fax:** +31 204 509 611



Breaking new ground.

---



**eldorado gold**

**Eldorado Gold Corporation**

11<sup>th</sup> Floor, 550 Burrard Street  
Vancouver, BC, Canada V6C 2B5

**t:** +1 604 687 4018

**f:** +1 604 687 4026

**Toll-free:** +1 888 353 8166

**[eldoradogold.com](http://eldoradogold.com)**

**TSX:** ELD  
**NYSE:** EGO