



eldorado gold

Eldorado Gold

Respectful Workplace Policy

July 2022

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I. Introduction

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.

II. 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. For greater clarity, see the definitions section of this Policy.

III. 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.

IV. Expectations

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.

V. Reporting

Voicing Concerns

Eldorado provides multiple channels for individuals to voice concerns, report instances of harassment, discrimination, and workplace violence and seek resolution. Individuals may use any of the following mechanisms to report instances of harassment, discrimination, and workplace violence:

- A direct supervisor or manager
- A member of the Human Resource (HR) Department
- Senior company officers
- Regional Ethics and Compliance liaisons and coordinators
- Union representatives (where applicable)
- Site-specific channels (respecting local language needs)
- The whistleblower hotline, [EthicsPoint](#)

Investigations

Legitimate concerns of harassment, discrimination, and workplace violence raised in good faith will be subject to formal investigation and resolution without risk of discrimination or retaliation.

Eldorado will investigate concerns and take remedial action to ensure the prohibited conduct ceases and does not occur again, as with any other reported workplace hazard to protect the physical and psychological safety of our workplace.

All investigations will be treated with the necessary sensitivity and appropriate level of confidentiality and information will be disclosed strictly on a need-to-know basis. The assigned investigator (or external investigator, where deemed necessary / appropriate) will take adequate steps to ensure individuals are protected from retaliation during and after the investigation.

All information pertaining to a complaint or investigation under this policy will be maintained in secure files within the HR department.

No hardship, loss, benefit, or penalty may be imposed on any individual in response to:

- Filing or responding to a complaint made in good faith;
- Appearing as a witness in the investigation of a complaint;
- Serving as an investigator of a complaint.

Lodging a complaint in good faith will in no way be used against the employee or have an adverse impact on the individual's employment status.

Corrective Action

Eldorado will take appropriate corrective actions against employees engaging in any forms of intimidation, harassment, and discriminatory practices and behaviours. Corrective action may include, but is not limited to:

- Verbal or written reprimands
- A formal apology
- Referral to counseling or training
- Suspension
- Probation
- Termination of employment

Corrective actions taken will comply with the applicable legislation, labor agreement, and collective bargaining agreements in each jurisdiction.

False Accusations

Filing groundless or malicious complaints is an abuse of this Policy and will be treated as a violation. If, after an investigation, it is found that the complainant maliciously made a false accusation, the complainant will be found in violation of this Policy and subject to appropriate disciplinary measures. A false accusation found to have been made with malice will be treated with the same degree of seriousness and intensity as the allegation itself.

VI. Governance and Accountability

The Corporate Governance & Nominating Committee of the Board provides oversight of Eldorado's policies and human capital management strategies. Oversight for people practices rests with our Chief People Officer. Joint accountability for ensuring adherence to the requirements of this Policy sits with Eldorado's Executive Team and the General Manager of each project and operation, under the leadership of the President & CEO.

VII. Monitoring & Non-Compliance

Reporting channels for individuals to voice concerns are reviewed annually, at a minimum, to ensure our approach remains effective. Third-party audits on Human Rights are also conducted periodically, as defined through SIMS. Reports made through the whistleblower hotline are routed immediately to our Chief People Officer and triaged accordingly for further investigation. HR Directors in each jurisdiction and corporate HR are accountable for maintaining Worker Voice Register(s) for their site(s) and are subject to periodic review and oversight by the Chief People Officer to evaluate effectiveness of procedures and continuously improve practices.

VIII. Contacts

The Chief People Officer is responsible for establishing and maintaining this Policy. The Policy is approved by the President & CEO, with endorsement of the Board of Directors and Executive Leadership Team.

IX. Definitions

Term	Definition
Bullying/ Mobbing	<p>Severe or repeated psychological or physical health-harming and abusive mistreatment of an individual or group of individuals (“the target(s)”) by one or more perpetrators.</p> <p>It includes any inappropriate conduct or comment by a person towards a worker that the person knew or reasonably ought to have known would cause that worker to be humiliated or intimidated, or adversely affect the worker’s health and safety.</p> <p>It is abusive conduct that is: (1) threatening, humiliating, or intimidating, or (2) work interference — sabotage — which prevents work from getting done, or (3) verbal abuse. It can include verbal abuse, verbal or non-verbal threats, physical assault, stalking, or other methods of coercion such as manipulation, blackmail, or extortion.</p>
Cyber-bullying	<p>A form of bullying/mobbing involves using electronic media to threaten, embarrass, intimidate, or exclude someone, or to damage their reputation (e.g., sending threatening text messages).</p>
Discrimination	<p>A distinction, intentional or not, based upon 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. Such grounds may include race, religious beliefs, ancestry, place of origin, nationality, political belief, sexual orientation, family or marital status, gender, gender expression, gender identity or membership in other protected categories.</p>
Gender identity (Gender expression)	<p>A person's inner sense of their own gender.</p>
Good faith	<p>Honesty or sincerity of intention (even if later found to be inaccurate).</p>
Harassment	<p>Any single or repeated series of intentional or unintentional behaviors (conduct, comments, bullying or action) that create a</p>

Term	Definition
	<p>psychological power imbalance because they are intimidating or abusive, and cause stress, anxiety, and fear. The person knows, or ought reasonably to know, will or would cause offense or humiliation to a worker, or adversely affect the worker's health and safety.</p> <p>Depending on the circumstances, such harassment may also include conduct such as stereotyped or demeaning remarks or gestures, bullying, or the display or circulation, whether in writing or electronically, of materials or pictures offensive to persons because of their race, religion, color, citizenship, national origin, age, sex (including gender, gender identity/expression, sexual orientation, pregnancy) marital status, disability, genetic information (including family medical history), or any other legally protected basis.</p>
Malice	The desire to cause pain, injury or distress to another or the deliberate indifference of causing pain, injury, or distress to another.
Perpetrator	A respondent who is found to have carried out a harmful, illegal, or immoral act pursuant to this Policy.
Physical harm	The material impairment of a person's physical health or bodily integrity.
Psychological safety	A shared belief held by members of a company, department, or team that the team is safe for interpersonal risk-taking. The ability to show and employ one's self without fear of negative consequences of self-image, status or career.
Respondent	The person in which a concern is made formally against.
Retaliation	Punishing or making an employment decision against an individual because such individual, in good faith, either made a complaint and/or otherwise participated in an investigation.
Sexual Harassment	Harassment based on gender, gender identity, gender expression, or sexual orientation, and can include unwelcome sexual advances, requests for sexual favors, unsolicited physical contact, unwelcome flirtations, offensive verbal, visual

Term	Definition
	<p>or physical conduct of a sexual nature, suggestive or lewd remarks, unwanted hugs or touches, offensive jokes or visuals, pornography, or sexually explicit material. Can be from a person of any gender, Gender Identity or Gender Expression, to another person of any gender, Gender Identity or Gender Expression.</p> <p>Courteous, mutually respectful, pleasant, noncoercive interactions between employees that are appropriate in the workplace and acceptable to and welcomed by both parties are not considered to be harassment, including sexual harassment.</p>
Workplace Violence	<p>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.</p>

X. Document Control

Version	Author	Approval	Approval Date
1	Naomi Scavington	Board of Directors	July 28, 2022