

Eldorado Gold Environmental Policy



# **Environmental Policy**

### I. Introduction

Eldorado Gold Corporation ("Eldorado") is committed to incorporating sustainability from the ground up, as articulated in our Sustainability Framework. To ensure a healthy environment, now and for the future, we will seek to prevent, minimize and mitigate our impact on the environment at every stage of our business, from exploration to closure and pursue environmental improvements and benefits through application of industry-leading practices and technology, where reasonably possible.

### II. Purpose

The purpose of this policy is to articulate Eldorado's environmental 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.

### III. Scope

Our Environmental Policy and management approach has been informed by the following international frameworks:

- The International Cyanide Management Code
- The Mining Association of Canada's *Towards Sustainable Mining* Guiding Principles, Frameworks, Protocols and associated guidance
- World Gold Council Responsible Gold Mining Principles, and
- United Nations Global Compact Principles.

Our Sustainability Integrated Management System ("SIMS") establishes company-wide sustainability requirements aligned with these international frameworks to ensure consistent application and adherence across all operations. All employees and contractors are expected to adhere to this Environmental Policy and associated requirements in SIMS.

#### Environmental Management

Eldorado is committed to:

- 1. Seeking to explore, plan, design, construct, operate and close facilities in a manner that mitigates their overall environmental impact, considering industry-leading best practices and technologies, and consistent with climate change objectives and targets.
- 2. Complying with all applicable environmental legal, regulatory and internal requirements, including SIMS.
- 3. Engaging with our stakeholders to understand and take into consideration their interests, concerns, priorities, and traditional knowledge (where available) related to the environment and our management practices and performance.



- 4. Identifying and assessing the environmental risks and impacts of our projects and operations, including routine and non-routine activities, and integrating these considerations into our planning and operational decision-making processes.
- 5. Establishing, and tracking progress towards environmental objectives and targets to deliver continuous improvement.
- 6. Providing environmental training, equipment and systems to our employees to ensure they have the knowledge and resources necessary to identify, mitigate and manage potential environmental impacts and meet our environmental commitments.
- 7. Conducting annual reviews of environmental management systems and performance, including tailings management, to assess effectiveness and support continuous improvement.

#### Environmental Stewardship

Through our management system and practices at all of our projects and operations, Eldorado is committed to:

- Locating, designing, constructing, operating, decommissioning and closing tailings facilities in a manner that seeks to support structural stability, that solids and water are managed within designated areas, and public health and safety are protected. We work to manage tailings to comply with local regulations and seek to conform to sound engineering practice, Eldorado's standards, Level A or higher of the Mining Association of Canada's *Towards Sustainable Mining* Protocols and commitments to our stakeholders. We will give preference to tailings management systems, approaches and best available technologies that minimize risk to people and the environment and avoid riverine or shallow submarine tailings in all cases.
- Developing and implementing a climate change strategy that identifies, assesses and manages climate-related risks and opportunities to the business, establishes greenhouse gas emission and energy reduction targets, explores low-carbon technology solutions and renewables and enhances the resiliency of our operations and nearby communities to climate change impacts.
- 3. Safely and responsibly managing cyanide and other hazardous materials to protect human health and the environment during transportation, storage, use and disposal.
- 4. Efficiently using water, energy and other resources, and minimizing and responsibly managing wastes. Understanding and managing our water use within the context of the watershed, including water availability, quality and the needs of other users.
- Contributing positively to the conservation of biodiversity through responsible mining and land use planning and management practices, including respect for critical habitat and applying the mitigation hierarchy to avoid, minimize, restore and offset significant biodiversity effects.
- 6. Eldorado will not explore or mine in World Heritage Areas and will comply with requirements of other legally designated protected areas.
- 7. Developing, maintaining and regularly reviewing reclamation and closure plans that consider socio-economic and environmental aspects, encouraging progressive



reclamation and supporting the provision of adequate financial resources to realize closure and post-closure commitments.

### IV. Reporting

Eldorado is committed to communicating this policy to internal and external stakeholders, and publicly reports environmental management and performance information on an annual basis through the following mechanisms:

- Corporate sustainability report prepared in accordance with the voluntary Global Reporting Initiative (GRI) standards (Core option), Sustainability Accounting Standards Board (SASB) Metals and Mining Standard and the Task Force on Climate-Related Financial Disclosures (TCFD),
- Responsible Gold Mining Principles report, including company conformance and third-party assurance and
- CDP disclosures for climate change, water and forests.

Reporting mechanisms are selected to ensure disclosures are transparent, well-organized and support our Sustainability Framework. Review of new or evolving reporting mechanisms is undertaken annually, at a minimum, to ensure our approach remains fit for purpose.

#### V. Governance and Accountability

The Sustainability Committee of the Board provides oversight of Company policies and strategies in the areas of environment, tailings management, climate change, health and safety, social performance, human rights and security. Ultimate accountability for social, environmental and health and safety performance rests with our President & Chief Executive Officer (CEO), while the Executive Vice President and Chief Strategy Officer and Executive Vice President and Chief Operating Officer have oversight at the corporate level. Responsibility for ensuring adherence to the requirements of this Policy is assigned to the General Manager of each project and operation.

### VI. Monitoring and Non-Compliance

Eldorado monitors compliance with this Policy by conducting quarterly risk assessments and regular site-based assessments in accordance with our Sustainability Integrated Management System.

#### VII. Contacts

The Director, Sustainability is responsible for establishing and maintaining this Policy. The Policy is approved by the President & CEO.



## VIII. Document Control

Version	Author	Approval	Approval Date
1.0	Jennifer Prospero	George Burns	February 24, 2022