

Business Ethics

Equinox Gold's stakeholders expect us to behave in an ethical manner across all of our operations.

Our Code of Conduct and Business Ethics sets the standards for business conduct and ethics that guide our actions. The Code of Conduct and Business Ethics has been adopted to assist all directors, officers and employees of the Company and our subsidiaries, as well as any third party working or acting on the Company's behalf, in making decisions regarding the expectations of the Company.

The Company's Anti-Bribery and Anti-Corruption Policy sets out our expectations for compliance with anti-bribery and anti-corruption laws in the countries in which we do business, and should be read together with the Code of Conduct and Business Ethics. All of Equinox Gold's directors, officers, employees, contractors and third parties with whom we do business must comply with applicable laws when acting on behalf of Equinox Gold, and we encourage these individuals to report any known or suspected breach of this policy or the Code of Conduct and Business Ethics.

These policies are only effective if people are empowered to report suspected or experienced infractions, or any behaviour that is not aligned with the Company's values. Equinox Gold's Whistleblower Policy explains how to report concerns anonymously, if desired, online, by phone or by email (equinoxgold@integritycounts.ca) through an independent service provided by IntegrityCounts. The Whistleblower Policy protects those who are raising legitimate concerns about the Company's operations and prohibits discrimination, harassment and/or retaliation against any person who reports complaints or provides assistance during investigations into unlawful or unethical behaviour. All accounting concerns raised are considered by Equinox Gold's Audit Committee, and investigations may be conducted internally or by external advisers. As well, the Audit Committee takes appropriate action for any confirmed misconduct.

2021 Performance

During 2021, every member of our workforce was required to complete Code of Conduct and Business Ethics training and sign an acknowledgment of the Code. The online training and test was completed by directors, management, employees and contractors.

During the year, Equinox Gold received 44 submissions through our whistleblower channels. More than 80% were related to employment practices and labour issues, which would have been more appropriately directed to management at the relevant mine site. We have therefore worked to increase awareness of, and trust in, the mechanisms available to our team members to raise and resolve labour issues at the site level, and to confirm that processes are in place to ensure satisfactory resolution is achieved. When looking at the issues raised, we also identified some training gaps related to grievance investigations that we will address during 2022 with our site staff. The other submissions have been reviewed and addressed in accordance with our internal processes and procedures.

While our objective is to create a culture where all concerns can be addressed through open discussion, we also understand that for various reasons some people will prefer to voice their concerns through our anonymous system at the corporate level. All concerns reported through the Whistleblower Hotline are treated with the same respect and degree of importance, regardless of their nature.

What's Next

We will continue to provide robust Code of Conduct and Business Ethics training for the entire workforce annually. We will also enhance internal awareness, feedback mechanisms and training to ensure all members of our team have access to conflict resolution support as well as the whistleblower process.