

OUR APPROACH

Business Ethics

Running our business with integrity is a core value at Equinox Gold. We are committed to doing what’s right – not just for our Company, but for the people and places connected to our work.



Why This Topic Matters to Us

We operate in an industry that directly affects local environments and communities, and demonstrating ethical decision-making and responsible conduct are fundamental to earning the respect, trust and confidence of our stakeholders. Upholding strong ethical practices also enhances our business performance by helping to minimize reputational and financial risks, ensuring compliance with regulatory requirements and fostering positive relationships with employees, partners, investors and communities.

DISCLOSURES

GRI 2-15	GRI 207-1
GRI 2-16	GRI 207-2
GRI 2-25	GRI 207-3
GRI 2-26	GRI 207-4
GRI 3-3	GRI 406-1
GRI 205-1	GRI 415-1
GRI 205-2	SASB EM-MM-510a.1
GRI 205-3	



Ethical Business Practices Are at the Core of Our Work

At Equinox Gold, we strive to operate with integrity and accountability and in accordance with all applicable laws and regulations. To achieve this, we have developed an integrated framework of values, standards and policies that define our culture and outline the expectations for our workforce and suppliers. As a signatory to the United Nations Global Compact, we have incorporated its principles for ethical business into our Company practices.

Code of Conduct and Business Ethics

Our [Code of Conduct and Business Ethics](#) (Code) sets out guiding principles and standards for professional behaviour. It addresses issues such as lawful conduct, professionalism in the work environment, human rights, confidentiality, community engagement and handling potential conflicts of interest. The Code applies to every individual representing Equinox Gold, including management, Board members and employees, as well as our business partners, suppliers, consultants and contractors.

When first joining Equinox Gold, workforce members are required to complete training on the Code and sign an acknowledgment of understanding. All employees must also complete annual training on the Code. This training has a different focus every year but always includes modules on compliance with our [Anti-Bribery and Anti-Corruption \(ABAC\) Policy](#).

In line with the World Gold Council's Responsible Gold Mining Principles (RGMPs), we also require that our suppliers conduct their business activities ethically and responsibly as a condition of doing business with us,

which is an expectation outlined in the Code. Suppliers must also acknowledge and uphold our [Supplier Code of Conduct](#), which provides guidance on their ethical and legal responsibilities.

Anti-Bribery and Anti-Corruption (ABAC)

Complementing the Code, our ABAC Policy sets out requirements for compliance with anti-bribery and anti-corruption laws. As a Canadian company operating in several countries, Equinox Gold is subject to a range of domestic and foreign anti-bribery and anti-corruption laws, including but not limited to the Canadian Corruption of Foreign Public Officials Act, the United States Foreign Corrupt Practices Act, the Brazil Clean Company Act and the Mexico Criminal Code and Anti-Corruption in Public Contracts Act.

The ABAC Policy reflects our zero-tolerance approach to bribery and corruption. Like the Code, the ABAC Policy applies to our workforce, our Board members and all third parties with whom we do business. When first joining the Company and annually thereafter, all employees are expected to complete training on the ABAC Policy.

The Board Audit Committee oversees and reviews the preparation of the annual fraud risk assessment report by Management. The Enterprise Risk Management (ERM) team also periodically performs bribery and corruption risk assessments as part of the ERM process.

Whistleblower Policy and Hotline

As part of our efforts to foster an open and healthy corporate culture, we ensure team members have safe and effective ways to communicate any issues or concerns they may have.

Our [Whistleblower Policy](#) sets out expectations for reporting breaches of the [Code](#) or other worrisome conduct and explains how to report a concern. Both the Code and the Whistleblower Policy make it clear that retaliation for reporting a concern is not permitted.

Concerns can be reported anonymously to our Whistleblower Hotline, which is operated by an independent service provider, Integrity Counts. The service is available in three languages to employees and contractors, business partners and suppliers, and other parties, and concerns can be reported anytime and anonymously via phone, email or online. In addition to empowering our workforce to speak up, our management and Board gain important insights about the Company through this valuable communication channel.

When a concern is submitted via our Whistleblower Hotline, our General Counsel and the Chair of the Audit Committee first review it. The Audit Committee has created a well-defined process for addressing various types of concerns.

- Human Resources (HR) concerns are directed to the Vice-President Human Resources, who reports directly to the Compensation and Nomination Committee (CN Committee), ensuring these matters receive appropriate attention from senior leadership with oversight from the CN Committee.
- For all other concerns, relevant Equinox Gold representatives will be notified as necessary. A decision will then be taken on whether to proceed with a formal investigation.

The Chair of the Audit Committee or the Chair of the CN Committee may engage external legal counsel, financial advisors, or other professional advisors to assist with an investigation.

Tax Transparency

Our operations generate income for the governments in the regions in which we operate, primarily through the payment of taxes, fees and royalties. We publicly report on those government payments through our annual [Extractive Sector Transparency Measures Act \(ESTMA\)](#) Report. We are committed to paying our fair share of taxes and royalties and recognize the important role they play in the economic development of our host communities.

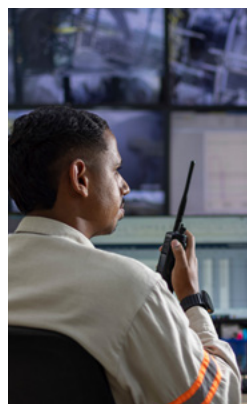
To ensure we responsibly manage our tax obligations, Equinox Gold has an internal Tax Code of Conduct, approved by management and the Board, which outlines

the Company's tax governance framework. Taxation matters at Equinox Gold are overseen by the Vice President Tax, who reports to the CFO and is responsible for the development, implementation and execution of Equinox Gold's tax strategy, planning, compliance and dispute resolution. With tax governance overseen by the Board, the Audit Committee is mandated to oversee the integrity of the Company's financial statements, consider tax risk management issues and monitor compliance with ethics policies. Our tax governance and control framework also regularly undergo external and internal audits. The Code also lays out the process for reporting tax issues, complementing the Company's Whistleblower Policy for reporting unethical or unlawful behaviour.

As set out in our Tax Code of Conduct, we build trusting relationships with tax authorities and respond openly and fully in a timely manner to all government requests for information pertaining to our legal structure, financial results and taxes during audits. A third party audits our tax reporting quarterly. We do not engage in tax planning that relies on the nondisclosure of activity or ownership in tax havens or secrecy jurisdictions, nor do we undertake any public policy advocacy in relation to tax matters.

Accountability

The Board has oversight and responsibility for establishing and regularly reviewing the Company's Code of Conduct and Business Ethics, as well as any other policies the Board deems appropriate to govern the behaviour of directors, officers and employees of the Company. The CEO and other management are responsible for creating a culture of integrity throughout Equinox Gold by putting effective controls and systems in place. Every employee, officer and director is responsible for upholding the Code and other policies that govern ethical behaviour.



EXPLORE OUR PERFORMANCE AND METRICS

View Equinox Gold's [annual Sustainability Report](#) or our performance indicators relevant to our business ethics.