



## Communications and Corporate Disclosure Policy

Equinox Gold Corp. (**Company**) has adopted this Communications and Corporate Disclosure Policy (**Disclosure Policy**) to ensure timely and accurate disclosure of material information. The Disclosure Policy also safeguards against the misuse or improper release of confidential information. It applies to all directors, officers, employees and authorized spokespersons of the Company and its subsidiaries.

### 1. Purpose

This Disclosure Policy covers all communications, including:

- continuous disclosure documents required under Canadian and U.S. securities laws;
- annual and quarterly reports including: financial and non-financial documents, annual information forms and proxy materials;
- press releases and presentations;
- technical reports;
- documents issued in connection with an offering of the Company's securities; and
- content on the Company's web site, social media, emails and other electronic communications.

This Disclosure Policy also covers oral statements involving the Company's business, prospects, or financial condition that are likely to become public, such as speeches, presentations, webcasts, conference calls, interviews, and analyst discussions.

### 2. Disclosure Committee

The Company has a disclosure committee (**Disclosure Committee**) which is responsible for overseeing the implementation of this Disclosure Policy, including:

- determining if any pending development or information concerning the Company constitutes "material information" or is otherwise material and, if so, whether such information should remain confidential;
- ensuring compliance with disclosure requirements in accordance with securities laws;
- overseeing the Company's disclosure controls, procedures and practices;
- monitoring the effectiveness of and compliance (by the relevant persons) with this Disclosure Policy;
- reviewing and authorizing disclosure (both written, including core and non-core documents, and oral) before public release;
- monitoring the Company's web site;
- maintaining a record of disclosure decisions; and
- reporting to the Company's Board of Directors.

The Disclosure Committee consists of the Company's Chief Executive Officer (**CEO**), Chief Operating Officer (**COO**), Chief Financial Officer (**CFO**), General Counsel, and Executive Vice President, Capital Markets (**EVP CM**). The Disclosure Committee shall meet as circumstances dictate, including to review and discuss the Company's disclosure compliance system and this Disclosure Policy, and a minimum of two members of the Disclosure Committee (of which one must be either the CEO or CFO) shall be required to make a decision.

### **3. Material Information**

Material information, including any changes to material information, about the Company must be disclosed in a timely, consistent and appropriate manner, according to applicable law. As well, it is essential to protect and prevent the improper use or disclosure of material information. Information relating to the Company is material (**Material Information**) if:

- the information results in, or would reasonably be expected to result in, a significant change in the market price or value of the Company's securities;
- the information would reasonably be expected to have a significant influence on a reasonable investor's investment decisions; or
- such information would significantly alter the total mix of information available to investors.

Although not intended to be a comprehensive list, the following are examples of information that could be material, depending on scale and magnitude:

- quarterly or annual earnings or operational results or projections;
- mergers, acquisitions, joint ventures or divestitures;
- management changes or changes in control of the Company;
- public or private sales of the Company's securities;
- new developments, including regulatory matters;
- changes in auditors and agreements/disagreements with auditors;
- pending or threatened litigation;
- labor disputes or disputes with major contractors or suppliers; and
- changes in capital or corporate structure.

### **4. Confidential Information**

Except as outlined in this Disclosure Policy, directors, officers and employees of the Company must keep confidential information private and not disclose it to anyone else unless necessary for business purposes and then only to authorized Company personnel or representatives who have a legitimate need to know the information and have been informed of its confidentiality.

To prevent misuse or accidental disclosure, the following procedures must always be followed:

- Safeguard confidential information both inside and outside of the office.
- Store sensitive documents securely, with access limited to those with a legitimate business need; use code names and password protection if necessary.
- Do not discuss confidential matters in places where conversations may be overheard.
- Do not read, display or leave confidential documents in public places areas.
- Only transmit confidential documents electronically where the transmission is reasonably secure.
- Limit duplication of confidential documents and dispose of unnecessary confidential documents properly.

The Disclosure Committee may also enforce “quiet periods” as circumstances dictate to limit selective or inadvertent disclosure.

#### **5. Designated Spokespersons**

Only the CEO, Chair, COO, CFO, EVP CM, Vice President Investor Relations (**VP IR**) or a person specifically authorized by the CEO or COO (together the **Designated Spokespersons**) may speak on behalf of the Company to the investment community, newsletter writers and the media. The CEO or COO may designate alternate spokespersons as needed for specific inquiries, including inquiries from regulators.

Anyone not authorized must not respond to external requests for information or comment on Company matters under any circumstances. All inquiries must be promptly directed to at least one Designated Spokesperson.

#### **6. News Releases**

Once the Disclosure Committee determines that a development is material, it will authorize filing of a news release – unless confidentiality is required. In such cases, appropriate confidential filings will be made in accordance with applicable law.

If the Toronto Stock Exchange or the NYSE American is open for trading at the time of a proposed news release announcing material information, prior notice of such news release will be provided to the market surveillance department of such stock exchanges.

#### **7. Conference Calls and Webcasts**

The Company will conduct conference calls to discuss quarterly earnings and may hold additional calls as deemed necessary by the Disclosure Committee.

Before any scheduled call or webcast, a public news release will be issued that includes the date, time, and instructions for access. All calls and webcasts will be publicly accessible via telephone or Internet to ensure equal access for interested parties. Invitations may be extended to analysts, institutional investors, members of the media, and other stakeholders, at the Company’s discretion. Following each event, an audio recording, archived webcast, or written transcript will be posted on the Company’s website and will remain available for at least 90 days.

## **8. Rumours**

The Company does not comment on rumours. Exceptions to this policy may only occur if the Disclosure Committee or the CEO, COO or CFO determine that a specific rumour, if left unaddressed, could adversely affect the Company's Interest.

Any director, officer or employee of the Company who becomes aware of a rumour that could have a material impact on the Company's stock price is required to promptly notify a member of the Disclosure Committee for assessment and appropriate action.

## **9. Contacts with Analysts, Investors and the Media**

*Communication* - only Designated Spokespersons or individuals explicitly authorized under this Disclosure Policy may communicate information concerning the Company to analysts, investors, or the media. All external inquiries must be directed to a Designated Spokesperson, with the EVP CM, serving as the primary contact for such matters.

*Meetings* - individual and small-group meetings with analysts and investors are an important element of the Company's investor relations strategy. Such meetings will be conducted as needed, with communication initiated or responded to in a timely, consistent, and accurate manner, in alignment with this Disclosure Policy.

Only non-material information will be shared during these meetings, along with information that has already been publicly disclosed. In the event that previously undisclosed material information is inadvertently communicated, and unless limited exceptions apply, the Company will promptly disclose this information through a public news release.

*Reviewing Draft Analyst Reports and Models* - The Company may review draft research reports or financial models prepared by analysts to verify factual accuracy against publicly disclosed information. It may also question assumptions that significantly diverge from the Company's published guidance. However, the Company will not confirm, refute, or influence the analyst's opinions, conclusions, or estimates, and will not express support for any report or model.

To avoid implying endorsement, all feedback will be provided in writing and accompanied by a disclaimer stating the review was limited to factual accuracy only.

## **10. Forward-looking Information**

The Company may provide certain forward-looking information in continuous disclosure documents, speeches and conference calls to enable shareholders and the investment community to better evaluate the Company. Any such information will be clearly identified as forward-looking and will include appropriate cautionary language, including material risk factors, assumptions, the current date and that the Company disclaims any intention to update or revise the forward-looking information, except as required by law.

## **11. Electronic Communications**

This Disclosure Policy applies to electronic communications (including emails, the Company's web site and the Company's social media platforms) as well as traditional written and oral communication. The EVP CM and the VP IR are responsible for responding to inquiries and comments received from the Internet from shareholders, the investment community and the media. Only previously publicly disclosed information or information that may otherwise be disclosed in accordance with this Disclosure Policy may be used in responding to such inquiries.

Unless an individual is a designated spokesperson, they are not permitted to represent or speak on behalf of the Company on Internet discussion forums, chat rooms, blogs or social networking services. If Company personnel participate in Internet discussions about the Company, they may do so: (a) in a personal capacity only, (b) in accordance with the Company's Code of Business Ethics, and (c) provided they may not at any time discuss confidential information or material information.

## **12. Compliance**

Compliance with this Disclosure Policy is of critical importance to the reputation and continued success of the Company. Each of the Company's directors, officers, employees and authorized spokespersons has a personal responsibility to understand and comply with their obligations under this Disclosure Policy.

Any person who violates this Disclosure Policy may face disciplinary action up to and including termination of employment of an employee without notice. The violation of this Disclosure Policy may also violate certain securities laws, which could expose an individual to personal liability.

### **Approved by the Board of Directors**

Adopted: December 13, 2019

Updated: March 3, 2021

Last Reviewed: August 13, 2025