



Communications and Corporate Disclosure Policy

Equinox Gold Corp. (“**Company**”) has adopted this Communications and Corporate Disclosure Policy (“**Disclosure Policy**”) to ensure that communications regarding the Company are factual, accurate and provided at the proper time. The goal of this Disclosure Policy is to ensure that material information about the Company is disclosed in a timely, consistent and appropriate manner, in accordance with applicable law and to protect and prevent the improper use or disclosure of material information or confidential information about the Company. This Disclosure Policy applies to all directors, officers and employees of the Company and its subsidiaries, as well as to those authorized to speak on its behalf.

1. Purpose

This Disclosure Policy covers:

- (a) continuous disclosure documents as required under applicable exchange rules and Canadian and United States securities laws and regulators;
- (b) annual and quarterly reports including: financial and non-financial documents, annual information forms, proxy materials and management’s discussion and analysis;
- (c) press releases;
- (d) presentations;
- (e) technical reports respecting the Company’s material properties;
- (f) documents issued in connection with an offering of the Company’s securities; and
- (g) information contained on the Company’s web site, social media platforms, emails and other electronic communications.

This Disclosure Policy also applies to oral statements made in circumstances where a reasonable person would believe the information in the statement will become generally disclosed. Such oral statements may include, but are not limited to, speeches, presentations, webcasts, conference calls, interviews and discussions with analysts where the Company’s business and affairs, prospects or financial condition is discussed.

2. Disclosure Committee

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

- (a) determining whether or not any pending development or information concerning the Company constitutes “material information” or is otherwise material and, if so, whether such information should remain confidential;
- (b) ensuring compliance with disclosure requirements in accordance with securities laws;
- (c) overseeing the Company’s disclosure controls, procedures and practices;

- (d) monitoring the effectiveness of and compliance (by the relevant persons) with this Disclosure Policy;
- (e) reviewing and authorizing disclosure (both written, including core and non-core documents, and oral) before public release;
- (f) monitoring the Company's web site;
- (g) maintaining a record of disclosure decisions; and
- (h) reporting to the Company's Board of Directors.

The Disclosure Committee consists of the Company's Chief Executive Officer ("CEO"), President, Chief Financial Officer ("CFO"), Chief Operating Officer ("COO"), Executive Vice President Exploration, General Counsel and Vice President Investor Relations (the "VP IR"). 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, CFO or COO) 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:

- (a) 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;
- (b) the information would reasonably be expected to have a significant influence on a reasonable investor's investment decisions; or
- (c) 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 set out in this Disclosure Policy, any director, officer or employee of the Company who is privy to confidential information (even if it includes Material Information) should maintain such information in confidence and not disclose to anyone else unless it is necessary to do so in the course of business and then only to authorized Company personnel or representatives who have a legitimate need to know the information and have been advised that it is confidential.

To prevent the misuse or inadvertent disclosure of confidential information, the following procedures should be observed at all times:

- (a) Ensure confidentiality of information outside of the office as well as inside the office.
- (b) Keep documents and files containing confidential information in a safe place, with access restricted to individuals who “need to know” that information in the necessary course of business. If necessary, code names should be used as well as having passwords for electronic data.
- (c) Do not discuss confidential matters in places where the discussion may be overheard.
- (d) Do not read or display confidential documents in public places or leave them where others may retrieve.
- (e) Transmit confidential documents electronically only where it is reasonable to believe that the transmission can be made and received under secure conditions.
- (f) Do not unnecessarily copy confidential documents and destroy extra copies of confidential documents.

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

5. Designated Spokespersons

The CEO, President, Chair, COO, CFO, VP IR or a person specifically authorized by the CEO or President may serve as an authorized spokesperson to speak on behalf of the Company to the investment community, regulators, newsletter writers and the media. In addition, the CEO or President may, from time to time, designate others within the Company with authority to speak on behalf of the Company as back-ups, or to respond to specific inquiries. Individuals who are not authorized spokespersons must not respond under any circumstances to inquiries from the investment community or the media or to comment on the Company’s information, material or otherwise. Any such request for information about the Company should in all cases be directed promptly to the CEO, President, Chairman or CFO, and in their absence, the VP IR.

6. Press Releases

Once the Disclosure Committee determines that a development is material, it and the CEO will authorize the issuance of a press release unless the Disclosure Committee determines that such development must remain confidential, in which case 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 press release announcing material information, prior notice of such press release will be provided to the market surveillance department of such stock exchanges.

7. **Conference Calls and Web Casts**The Company generally holds conference calls for quarterly earnings releases and may hold calls at other times as determined by the Disclosure Committee. Conference calls will be accessible simultaneously to all interested parties by telephone or via a web cast over the Internet. The call will be preceded by a press release containing all relevant material information.

The Company will provide advance notice of a conference call or web cast by issuing a press release announcing the date, time and information on how interested parties may access the call and web cast. In addition, the Company may send invitations to analysts, institutional investors, the media and others. An audio recording or archived web cast and/or text transcript will be made available on the Company's web site for a minimum of **90** days following the conference call or webcast.

8. **Rumours**Generally, it is the Company's policy to not comment on rumours. Exceptions to this policy may be made if the Disclosure Committee or the CEO, President or CFO authorize a response to a rumour that is deemed harmful to the Company's interests if not rebutted.

If any director, officer or employee of the Company becomes aware of a rumour concerning the Company on a chat-room, news group, or any other source that may have a material impact on the price of the Company's stock, he or she should immediately contact a member of the Disclosure Committee.

9. **Contacts with Analysts, Investors and the Media***Communication* - Individuals who are not authorized as "designated spokespersons" under this Disclosure Policy must not communicate information, material or otherwise relating to the Company to analysts, investors or the media. Inquiries from analysts, investors or the media must be referred to a designated spokesperson and the VP IR is the primary contact for such inquiries.

Meetings - The Company recognizes that meetings with analysts and investors are an important element of its investor relations program. The Company will meet with analysts and investors individually or in small groups as needed and will initiate contacts or respond to analyst and investor calls in a timely, consistent and accurate fashion in accordance with this Disclosure Policy.

The Company will provide only non-material information through individual and group meetings, in addition to publicly disclosed Material Information. If previously undisclosed material information is inadvertently disclosed to an analyst or any other person, with limited exceptions, such information must then be publicly disclosed promptly via press release.

Reviewing Draft Analyst Reports and Models - The Company may review analysts' draft research reports or financial models for factual accuracy based on publicly disclosed information or question assumptions if the estimate differs significantly from the Company's published guidance. The Company will not confirm, refute, or attempt to influence an analyst's opinions or conclusions and will not express comfort with the analyst's report, financial model and earnings estimates. To avoid appearing to endorse an analyst's report or model, the Company will provide its comments in writing and will attach a disclaimer to written comments to indicate the report was reviewed only for factual accuracy.

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 VP IR is 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, he or she is 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 he or she 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