

ICMI Cyanide Code Gold Mining Recertification Audit

Summary Audit Report

**Equinox Gold Corp,
Los Filos Mine**

Guerrero, México

**Submitted to:
The International Cyanide Management Institute
1400 I Street, NW – Suite 550
Washington, DC 20005
USA**

2022 Audit Cycle



15929 Avenida Venusto, Apt. 225,
San Diego,
CA, 92128, USA


www.smartaccess.us

LOS FILOS MINE
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Mining Operation: Los Filos Mine

Mine Owner: Equinox Gold Corp

Mine Operator: Desarrollos Mineros San Luis, S.A. de C.V.

Name of Responsible Manager: Gregg Bush, General Manager

Address and Contact Information:


Domicilio Conocido, Mezcala,

Guerrero, México, C.P. 40191

Telephone: +52 733 33 39500

gregg.bush@equinoxgold.com

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Location and description of the operation

Los Filos mine location is presented in the picture below




Equinox Gold Mining Corporation owns and operates Los Filos Gold Mine (Los Filos) located in Guerrero State, Mexico, through its 100% owned Mexican subsidiary, Desarrollos Mineros San Luis, S.A. de C.V. Los Filos is approximately 180 km southwest of Mexico City.

The mine property is in a low caducifolia rainforest zone. Average annual temperature ranges are approximately 18°C to 22°C. The area is characterized by distinct dry and wet seasons. Climate conditions during the wet season (June through October) are hot and humid. Guerrero is a zone that can be affected by tropical storms and hurricanes.

The average annual precipitation and evaporation is approximately 900 mm and 1,900 mm, respectively. The months with the most rainfall are June through September. Very little precipitation (less than 5% of the average annual rainfall) occurs from November to April. The mine property area can also be affected by tropical storms and hurricanes that can result in short-

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term high-precipitation events. Mining operations are conducted year-round and are not impacted by climate conditions.

The closest local communities are Carrizalillo, Mezcala, Mazapa and Xochipala, with the larger populated centers of Chilpancingo and Iguala nearby. All are accessible via gravel and/or paved roads. Over 2,033 people are employed on site as unionized workers, non-unionized employees, and independent contractors, and over 65% of workers and employees are from the local communities.

The Balsas river, located approximately four kilometers from the northern boundary of the mine property, supplies water to the mine from the Mezcala pumping station near the town of Mezcala. This river is the only perennial surface water course near the mine property. The most important tributaries in the area are the Mazapa and Xochipala streams, both of which are seasonal, and join the Balsas river on its southern margin.

Water from the Balsas river basin is used for water supply in ore beneficiation processes. The estimated volume of water obtained from the Balsas river basin is 46 l/s, which is primarily used for freshwater makeup purposes. Current demand is 0.93 million cubic meters per year (Mm^3/y) and permitted capacity is 1.23 Mm^3/y

The Los Filos mine comprises three open pits (LFOP, BOP and GOP) that produce a combined average of 7.6 Million tonnes (Mt) of ore and two underground mines that produce an average of 0.8 Mt of ore per year. Open pit mining is conventional drilling and blasting with loading by excavator and trucking to a crushing station or direct hauling from the mine directly to leach pads. LFUG and BUG underground mining employs cut-and-fill mining methods above or below or in the form of a chevron or long hole stop. Contractors transport all of the underground ore to the crushing station.

All ore is processed via heap leaching. Heap Leach Pads 1 and 2 (Pad 1 and Pad 2) are currently in operation, each with a separate leachate collection system. Pad 1, the original heap leach pad, has been historically loaded with both Crush ore and Run of Mine (ROM) ore but is presently only loaded with ROM ore. Pad 2, which became operational in 2013, was initially loaded with ROM ore for the first one to two lifts, but currently is only being loaded with Crush ore at 5 m lift heights.

Medium to High-Grade ore is sent to a crushing system consisting of a primary jaw and two secondary cone crushers, and is reduced to a target particle size of 80% passing minus 19 mm. This ore is known at the Los Filos site as "Crush" ore. The Crush ore is mixed with cement, lime and water on the conveyor belt system for agglomeration purposes and is transported overland to the heap leach pad(s) via a combination of conveyor/stacking and haulage trucks to Pad 2. Once placed in a uniformly thick lift on the heap leach pad, the agglomerated ore is cyanide leached for gold extraction using both drip emitters and sprayers as irrigation techniques.

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Low-grade ore is hauled by mine trucks and placed separately on Pad 1 as Run-Of-Mine (ROM) material for leaching, following the addition of lime at a rate of 3 kg/t on each loaded haul truck. No ore sourced from Los Filos Underground is classified as low grade.

Gold is recovered from crushed and run-of-mine ore via a conventional, low-cost heap leach and ADR (adsorption-desorption-recovery) process. Infrastructure on site includes primary and secondary crushing plants with 18,000 tonnes /day (t/d) capacity, an overland conveyor system, agglomerator, two heap leach pads (one for ROM and one for crushed ore, with associated conveyors and stackers), two pregnant solution collection ponds (one for each heap), one recirculation pond and two contingency water ponds, and an ADR plant and gold refinery.


Low grade ore from the pits is transported on the ROM roads and, after addition of lime from silos during haulage, is deposited on Pad 1 and Pad 2. High grade ore from the Los Filos open pit and the underground mine is crushed and then placed on Pad 1 or Pad 2. The crushing operation includes primary crushing with a jaw crusher and secondary crushing with two cone crushers. The crushed ore is transported by conveyor where cement and lime is added for agglomeration before placement on the leach pads.

ADR Plant and Associated Storage Ponds



Fresh water used in the leaching process is pumped from a deep well in Mezcala to a storage tank for redistribution to different parts of the operation, including the cyanide mixing tank (T-

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100). The sodium cyanide is transported in solid briquettes in an 18-ton isotainer truck. After dissolution of the solid cyanide, the solution is transferred to a storage tank (T200) for dosing to different process points (barren tank, recirculation tank, activated carbon circuit). This solution has a concentration of approximately 30 percent sodium cyanide.

The cyanide solution is added to the barren solution at the outlets of the barren and recirculation tanks and subsequently pumped to the booster station for recirculation to the heap leach pad. The average concentration is 250 to 280 parts per million (ppm) of free cyanide. When the solution contacts the ore, the cyanide reacts with the gold and silver and converts to a pregnant solution that reports to two gravel-covered ponds at the toe of the heap leach pad (i.e., North Pregnant Pond and South Pregnant Pond). Each pond is equipped with two pumps to pump the solution to the Adsorption, Desorption and Recovery (ADR) Plant.

The ADR plant consists of seven trains with four columns of activated carbon where the pregnant solution flows against current (Carbon In Column - CIC), an acid wash, a carbon regeneration furnace, chemical storage and carbon stripping circuit; pressure vessels, elution tanks and a heater. The function of the carbon is to absorb the gold and silver in the pregnant solution.

The pregnant solution enters at the base of the column, flows upward through a fluidized bed of carbon, and then passes by gravity to the next column. Upon leaving the last column, the solutions has left its gold and silver in the carbon and been converted to barren solution. Each train has a nominal capacity of 950 to 1,000 cubic meters per hour. At the end of each train there is a screening system to retain carbon fines and avoid sending them to the heap leach pad.

The barren solution that leaves the carbon trains with low concentrations of free cyanide is returned to the barren and recirculation tanks. To maintain the water balance in the rainy season, it is sometimes necessary to neutralize part of the sterile solution coming from the carbon columns. Los Filos has two neutralization tanks where hydrogen peroxide is added to react with the cyanide in solution. The neutralized solution is sent to the Excess Pond 1 or Excess Pond 2 for storage and subsequent use in the dry season by returning the solution to the recirculation pond.

The carbon is transferred from column to column with counter current flow of the rich solution until all gold and silver are absorbed. Then, the carbon is transferred from the first column in each train to the stripping column. The regenerated carbon, the new carbon, or both, are transferred to the last column in each train, as required, to replace the carbon transferred to the stripping column. In the stripping circuit, the gold is desorbed from the carbon using a hot caustic solution.

The stripping circuit consists of three columns operated independently in parallel. The stripping solutions contains caustic soda with an average temperature of 120 to 130 °C. As the stripping solution passes through the carbon, the gold is desorbed to produce a pregnant solution. The hot pregnant solution passes through heat exchangers to be cooled to 85 °C and then passes to

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the electrowinning circuit. The gold poor electrowinning solution is recirculated to the stripping column. The stripping of gold and silver from each carbon batch takes approximately 16 hours to complete. The stripped carbon is transferred to the acid wash circuit.

The carbon regeneration is composed of two processes: chemical regeneration and thermic regeneration. The regenerated carbon is screened to retain carbon fines created during the handling and then sent to the carbon storage tank to be returned to the absorption columns. The carbon fines product from the screening process is recovered in the carbon fines tank and then sent to the filter press. After filtration, the carbon fines are partially air-dried and loaded in super sacks to be sent to the warehouse for later offsite shipment as a by-product with low values of gold and silver.

The pregnant solution from the stripping columns is fed to six electrowinning cells. The sludge that deposits in the bottom of the cell is pumped to the filter press where 80 percent of the water is removed. The rest of the water content is eliminated in a retort oven before being sent to the induction furnace. The loads are smelted at approximately 1,200 Celcius. At this temperature, the load in the furnace has reached a liquid state composes of two phases. In the upper phase is slag. The gold and silver, both heavier, are in the lower phase in the bottom of the crucible. When the separation is complete, the crucible is tipped to remove the cap of slag and later the valuable metals are poured into molds in the shape of bars. The Dore bars are transported to an offsite refinery. The slag is crushed, milled, and treated in a concentrator to recover the valuable metals. The concentrate is returned to the induction furnace to re-smelt while the slag with low levels of valuable metals is stored for sale.

The scope of the recertification audit includes the following cyanide facilities: Leach Pad 1 including Stages 1-5; Leach Pad 2 including Stages 1-3; one backfilled Pregnant Leaching Solution pond (PLS1) from Leach Pad 1 that is divided in two sub ponds (i.e. North Pregnant Pond and South Pregnant Pond); one open Pregnant Leaching Solution pond from Leach Pad 2 (PLS2); Recirculation pond; Excess ponds 1 and 2; Leach Collection Recovery Systems (LCRS) at PLS1, PLS2 and recirculation ponds; two underdrain collection systems below the PLS1 pond; booster station; solution channels and pipelines between the leach pads, the process plant and the solution ponds; a cyanide mixing area including cyanide mixing and storage tanks (Area 800); the Adsorption, Desorption and Recovery (ADR) Plant (Area 420); and the barren, neutralization and recirculation tanks area (Area 250). The neutralization tank is used for cyanide destruction purposes, but the neutralized water is stored in Excess Pond 1 and 2 and not discharged to the environment. There are no tailings facilities nor treated water discharges cyanide at Los Filos.

New facilities constructed since the 2019 recertification audit include a replacement of the Cyanide mixing tank (T-100) in 2021; the implementation in 2021 of a bypass in the ADR plant to divert solution from the trains with fine carbon into the recirculation pond; and Phase 2 of Leach Pad merger area between Leach Pad 1 and Leach Pad 2, which was commissioned in July 2020.

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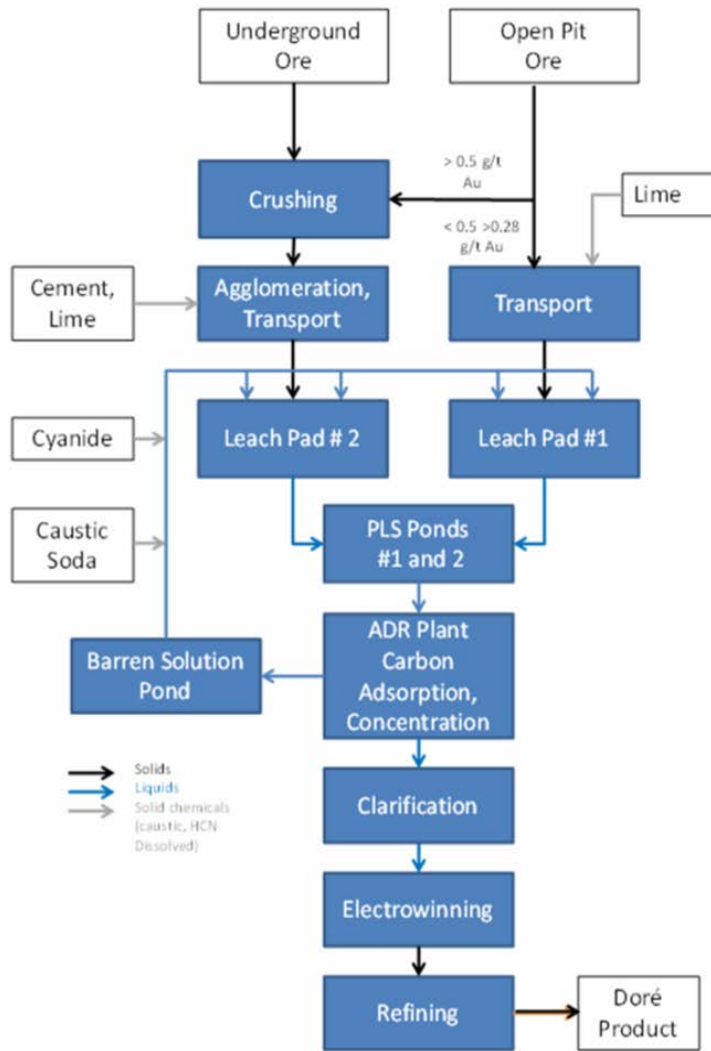


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Sodium cyanide is transported to Los Filos in solid briquettes in an 18-ton isotainer truck. The isotainer is connected to the T-100 tank, freshwater is added, and recirculated between the isotainer and tank until the solid cyanide is completely dissolved.

Los Filos was acquired from Leagold in March 2020. The last recertification audit was conducted in 2019 while under ownership and management of Leagold. This recertification audit is conducted within two years of its March 2020 acquisition by Equinox Gold.

Los Filos simplified ore processing flowsheet is presented below:



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Auditor's Finding

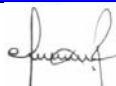
The International Cyanide Management Institute (ICMI) approved Audit Team verified that Los Filos operation is in FULL COMPLIANCE with ICMI Cyanide Code requirements for Gold Mining operations.

This operation has not experienced any compliance issues during the previous three year audit cycle.

Los Filos has experienced zero significant cyanide incidents during this 2-year recertification audit cycle.

This operation was determined to be in FULL COMPLIANCE with the International Cyanide Management Code.

Auditor's Attestation


Audit Company:	SmartAccEss Socio Environmental Consulting, LLC
Lead Auditor:	Luis (Tito) Campos E-mail: titocampos@smartaccess.us
Mining Technical Auditor:	Fernando Rodriguez 
Date(s) of Audit:	January 25 th – 28 th , 2022

I attest that I meet the criteria for knowledge, experience and conflict of interest for Code Verification Audit Team Leader, established by the International Cyanide Management Institute and that all members of the audit team meet the applicable criteria established by the International Cyanide Management Institute for Code Verification Auditors.

I attest that this Audit Report accurately describes the findings of the verification audit. I further attest that the verification audit was conducted in a professional manner in accordance with the International Cyanide Management Institute for Mining Operations Verification Protocol and using standard and accepted practices for health, safety and environmental audits.

Los Filos Mine

Name of Operations


Signature of Lead Auditor

January 28th, 2022

Date

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SUMMARY AUDIT REPORT

1. *PRODUCTION AND PURCHASE*: Encourage responsible cyanide manufacturing by purchasing from manufacturers that operate in a safe and environmentally protective manner.

Standard of Practice

1.1 Purchase cyanide from certified manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide, and to prevent releases of cyanide to the environment.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 1.1

Discuss the basis for this Finding/Deficiencies Identified:

Sodium Cyanide purchased by Los Filos during the recertification period was manufactured by The Chemours Memphis Plant (Tennessee, USA), facility that is currently certified under the Code. This plant achieved the original certification in 2005 and has maintained compliance and its ICMI certification since then. The latest recertification was on January 21st, 2020.

The auditors were informed that in December 2021, The Chemours Company has sold their mining solutions business to “Draslovka Mining Solutions”. Since February 2022 (after the field audit conducted at Los Filos), the ICMI web page is showing Draslovka as the Cyanide Producer certified under the Code. The Chemours Memphis Plant is now called the Draslovka Memphis Plant.

In addition, the transfer of bulk cyanide to isotainers at Chemours San Luis Potosi Bulk Transloading Facility, considered a production activity, was recertified on November 21st, 2021, as published on the ICMI website. This facility has also been acquired by Draslovka, and its official certification name is now “Draslovka San Luis Potosi Bulk Transloading Facility”.

The auditors reviewed the bills of lading to confirm that Los Filos only received cyanide from Chemours during the recertification period.

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2. TRANSPORTATION: Protect communities and the environment during cyanide transport.

Standards of Practice

2.1 Require that cyanide is safely managed through the entire transportation and delivery process from the production facility to the mine by use of certified transport with clear lines of responsibility for safety, security, release prevention, training and emergency response.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 2.1

Discuss the basis for the Finding/Deficiencies Identified:

Los Filos mine has provided a letter (dated May 2021) signed by Chemours (now Draslovka) indicating the complete Sodium Cyanide Supply Chain of Custody from Memphis Production Plant to Equinox Gold Los Filos mine in Mexico.

Chemours Company Mexico (now called Draslovka Mining Solutions) supply chain consists of railroad transport from the Memphis plant as part of the US/Canada Rail & Barge Supply Chain by rail-to-rail yards and rail heads in Laredo, TX, and then with Mexican Railroad Railway (Ferromex) and Kansas City South of Mexico (KCSM) to the Chemours warehouse in San Luis Potosí, Mexico. Transportation of wagons to trucks at the Chemours warehouse in San Luis Potosí, Mexico. Bulk Transloading Facility (to isotainers) in San Luis de Potosí. Transport of isotainers by truck from San Luis Potosí, Mexico, to Los Filos by Transportes Especializados Segutal SA de CV (Segutal).

The Draslovka US/Canada Rail & Barge Supply Chain was certified as in full compliance against The Code on April 7th, 2022. . The US/Canada Rail & Barge Supply Chain includes rail movements from the Memphis production plant to rail yards in Laredo, TX for customer locations in Mexico.

The Draslovka' s Mexico Supply Chain certification was extended to September 30, 2021, due to health concerns and travel restrictions resulting from the COVID-19 pandemic. The auditor verified that the supply chain has obtained the recertification in full compliance on February 18th, 2022.

3. HANDLING AND STORAGE: Protect workers and the environment during cyanide handling and storage.

Standards of Practice

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3.1 Design and construct unloading, storage and mixing facilities consistent with sound, accepted engineering practices, quality control/quality assurance procedures, spill prevention and spill containment measures.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 3.1

Discuss the basis for this Finding/Deficiencies Identified:

The cyanide offloading, storage, and mixing area was designed and constructed with solid international engineering practices, as determined by the initial certification audit in 2010, and verified in the 2014, 2016 and 2019 recertification audits, and remain substantially unchanged since that time. Los Filos receives sodium cyanide in solid briquettes in an 18-ton isotainer truck. Area 800 is the cyanide offload area at the ADR Plant (the Plant). Area 800 consists of a mixing tank (T-100), a storage tank (T-200), and various pumps, pipelines, valves and appurtenances.

The cyanide mixing area is located in a dedicated area located approximately 25 meters away from the ADR plant. Los Filos maintains design and as-built drawings by engineering company Degussa for Area 800 dated 2005. In February 2021, Los Filos replaced the cyanide mixing Tank (T-100) as the results of annual preventive maintenance ultrasound tests indicated that the tank needed to be replaced. Los Filos developed a specific procedure for dismantling and decommissioning of the tank. The new tank was constructed following the same specifications of the existing tank. The auditor verified the tank fabrication dossier developed by contractor COMAJAL and signed by a professional engineer. All other facilities remain unchanged from the 2019 recertification audit. Los Filos has a plan to replace the cyanide storage tank (T-200) in 2022. The field component of the audit confirmed that the cyanide mixing area is located on concrete hardstanding and maintained in good condition. Cyanide mixing and cyanide storage tanks are located within containment concrete berms and is connected with the recirculation pond, which provides additional capacity to contain more than 110% volume of the largest tank.

The cyanide offload area (Area 800) is located in a dedicated facility located on competent concrete hardstanding, which is located far away from communities or surface waters. The nearest seasonal creek (Cañada 23) is located several hundred meters to the west of Area 800 with no path of connection between them. The nearest community, Carrizalillo, is located several kilometers away uphill and upgradient from Area 800. The offload area is located approximately 25 meters from the ADR plant. The plant area is totally fenced, and no offices are located close to Area 800, which is away from locations where workers may congregate. Unauthorized access to the area is prohibited. Area 800 has a fixed HCN monitor with visual and audible alarms to detect any HCN gases and evacuate the area if necessary. In addition, during cyanide mixing, operators are required to have handheld HCN monitors to perform the task. Area 800 is located outdoors which provides good natural ventilation.

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Los Filos receives cyanide briquettes via isotainer such that there is no liquid cyanide until the offload procedure starts. The isotainer is parked on a curbed concrete pad that slopes to a sump that drains by gravity via a double-walled pipe to the nearby recirculation pond. The auditor observed the concrete pad and sump to be in good condition to serve as a barrier to minimize seepage to the subsurface.

Los Filos has a cyanide offloading area that includes a mixing tank (T-100) and a cyanide storage tank (T-200). There are ultrasonic level indicators and high-level alarms installed on both tanks. These level indicators are continuously monitored from the process control room. Arrangements remain unchanged since the previous recertification audit. There are both a Hi-level (94.7% and 93%) and Hi-Hi level alarm (97.8% and 97.3%) on both the cyanide mixing and storage tanks, respectively. The interlock valve from the mixing tank to the storage tank shuts off automatically when the Hi-level indicator is reached. The auditors observed screenshots in the control room showing that the level indicators were functioning correctly. Visual alarms are also located in the control room. These level alarms are calibrated on a quarterly basis and are included in the preventive maintenance routes. Los Filos has a written work instruction detailing the required maintenance and calibration of the level sensors (as well as all other types of sensors). The procedure references the work instructions for level sensors and switches. The auditors observed calibration records for the recertification period to verify that the level sensors and switches were maintained and calibrated throughout the recertification period and found that some records were missing for periods of time in 2020 due to COVID-19 pandemic and a roadblock from nearby communities at the end of 2020.

Cyanide mixing and storage tanks are located in a dedicated area approximately 25 meters away from the ADR plant and contained within concrete berms with good condition concrete flooring with epoxy sealing to avoid infiltration. Arrangements remain unchanged since the previous recertification audit. This containment area is also connected with the recirculation pond, which provides additional capacity to contain at least 110% volume of the largest tank. In addition, there are automatic sump pumps that maintains the secondary containments free of any fluids. The concrete and sump are underlain by a 60-mil High Density Polyethylene (HDPE) liner. Between the concrete and the liner, there is a competent barrier to prevent seepage to the subsurface. The bermed containment areas have been confirmed both previously as part of engineering specification checks and during the field audit. During the field inspection, the containment area and sump were noted to be in good condition, with no significant damage, spalling or cracking evident.

The secondary containment for the cyanide mixing tank T-100 and the storage tank T-200 is constructed with concrete to provide a competent barrier to leakage. The concrete and sump are underlain by 60-mil HDPE liner. The design and construction quality assurance for this pad were reviewed during the 2010 initial certification audit and were found acceptable. The tanks are located within a bermed concrete impoundment, which was observed to be of sound integrity and considered suitable for containment in the event of a release or tank failure, providing

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competent barrier to leakage. The berms and containment area are subject to weekly inspections. Arrangements remain unchanged since the previous recertification audit. Solution reporting to the secondary containment sump is pumped to either the recirculation pond or the T-200 tank. Los Filos has developed a written procedure describing how to operate the sump pump and valves. Cyanide solution is returned to the T-200 Tank whereas rainwater and/or cleaning water are sent to the recirculation pond. As Area 800 secondary containment does not have enough capacity to contain 110% of the largest tank, it is connected to the recirculation pond which provides additional capacity in case of spills.

Los Filos does not store solid cyanide at site, as the site receives solid cyanide as briquettes in isotainers. The cyanide mixing and storage tanks are located outdoors with natural ventilation, as such, providing adequate ventilation to prevent build-up of hydrogen cyanide gas in the event that cyanide comes in contact with water. In addition, there is a fixed HCN monitor, with audible alarm, located at Area 800. As stated, the operation does not store solid cyanide at site. It uses only liquid cyanide stored in enclosed tanks, thereby eliminating the possibility of contact between water and solid cyanide. Los Filos stores cyanide solution in a secure area where public access and unauthorized personnel access is prohibited. Warning signs are posted at the entrance of the ADR Plant, prohibiting the access to non-authorized personnel. The access to the plant area is also restricted. The cyanide mixing and storage tanks are located within the fenced, gated, and patrolled area for the ADR Plant, which is also within the fenced mine property. The security guards at the gate for the ADR Plant communicates over radio to process staff to grant permission for entry. In addition, the offload area is continually monitored by video camera by the control room operator. The cyanide solution at Los Filos is stored separately from incompatible materials such as acids, strong oxidizers and explosives and apart from foods, with appropriate barriers that will prevent mixing. Secondary containments are designed to prevent cyanide spills from mixing with incompatible materials, as verified by following potential flow paths. No storage of other materials was observed during the field inspection.

3.2 Operate unloading, storage and mixing facilities using inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 3.2

Discuss the basis for this Finding/Deficiencies Identified:

Los Filos receives solid cyanide in isotainers; no drums or wooden crates are involved. Los Filos has procedure LFIL-PO-PLPRO800-002 "Reception, offload and transfer of sodium cyanide in Area 800" and 13 work instructions specific for every step of the process for the safe offloading and transfer of cyanide. The offload procedure requires that the isotainer be inspected for

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leakage and that the isotainer connections be rinsed after an offload is complete. Work instruction LFIL-IT-PL-PRO800-006 “Rinse with water and emptying of isotainer” describes the process to rinse the isotainer once cyanide offload is complete. Any spills or leaks related to a cyanide offload and onto the concrete pad are captured in a sump that drains by gravity via a double-walled pipe to the nearby recirculation pond. Work instruction LFIL-IT-PL-PRO800-012 “Operation of sump pump Area 800” describes the process to operate the pump depending if the fluid in the sump is cyanide solution or rainwater/cleaning water.

Los Filos has procedure LFIL-PO-PLPRO800-002 “Reception, offload and transfer of sodium cyanide in Area 800” and 13 work instructions specific for every step of the process for the safe offloading and transfer of cyanide, including the requirements for inspection, observation and mixing of cyanide solutions, as well as the operation and function of valves, pumps and various interlocks within the cyanide mixing process. The procedures detail the responsibilities for the transporter and the site personnel. The procedure includes a checklist for cyanide preparation that requires measuring pH levels, inspection of emergency showers and eye wash stations, cyanide antidote kit, initial pH and tanks level, among other requirements for safe cyanide management. The auditors reviewed completed checklists for the recertification period and found them to be complete. Work instruction LFIL-PO-PLPRO800-001 “Procedure to respond to contingencies in Area 800” includes a requirement for immediate clean-up of any spilled cyanide including flushing the secondary containment of the cyanide mixing. No spills related to cyanide mixing were reported since the last recertification audit. Procedure LFIL-PO-PLPRO800-002 “Reception, offload and transfer of sodium cyanide in Area 800” requires drivers and plant operators to use the appropriate PPE during cyanide offload activities. These include steel-toed rubber boots, rubber gloves, approved respirator, face shield, Tychem coveralls, hard-hat, hearing protection, personal HCN detector and a harness to work on heights. The procedure requires that a second observer (plant operator) watch the offload connection. In addition, cyanide offloading activities is observed from the control room through a closed video circuit. The cyanide briquettes in the isotainer already comes with red colorant dye. Colorant dye is added to solid cyanide at Chemours (now Draslovka) San Luis de Potosi cyanide transfer plant from boxes to isotainers. This was verified by the auditors during the field visit and through interviews with process personnel. A cyanide offloading event was observed during the audit. The review indicated that the Los Filos has appropriate SOPs and practices to handle and offload cyanide solutions in a safe manner.

4. OPERATIONS: Manage cyanide process solutions and waste streams to protect human health and the environment.

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4.1 Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 4.1

Discuss the basis for the Finding/Deficiencies Identified:

The scope of the recertification audit includes the following cyanide facilities: Leach Pad 1 including Stages 1-5; Leach Pad 2 including Stages 1-3; one backfilled Pregnant Leaching Solution pond (PLS1) from Leach Pad 1 that is divided in two sub ponds (i.e. North Pregnant Pond and South Pregnant Pond); one open Pregnant Leaching Solution pond from Leach Pad 2 (PLS2); Recirculation pond; Excess ponds 1 and 2; Leach Collection Recovery Systems (LCRS) at PLS1, PLS2 and recirculation ponds; two underdrain collection systems below the PLS1 pond; booster station; solution channels and pipelines between the leach pads, the process plant and the solution ponds; a cyanide mixing area including cyanide mixing and storage tanks (Area 800); the Adsorption, Desorption and Recovery (ADR) Plant (Area 420); and the barren, neutralization and recirculation tanks area (Area 250). The neutralization tank is used for cyanide destruction purposes, but the neutralized water is stored in Excess Pond 1 and 2 and not discharged to the environment. There are no tailings facilities nor treated water discharges cyanide at Los Filos.

Los Filos has developed several plans, manuals, procedures and work instructions for the safe operation of cyanide facilities, including offloading, storage and mixing facilities; barren, neutralization and recirculation tanks area; ADR plant; and heap leach operations. There are approximately 80 documents between plans, manuals, procedures, work instructions and checklists related to cyanide management. All procedures and work instructions include a description of the tasks to be performed, a section related to PPE requirements and considerations of safety hazards. Procedures and work instructions are reviewed and updated when there are significant changes in the tasks. Procedures and work instructions were reviewed and found to be sufficiently detailed to enable safe operation.

Los Filos has operation manuals, plans, procedures and work instructions that include critical parameters for the safe operation of cyanide facilities. Procedure LFIL-PO-PLPR250-003 "Solution Management in ponds due to excess water" includes maximum operating levels for the PLS, recirculation and excess water ponds. As all the ponds are interconnected, critical volumes at Excess Pond 1 and 2 has been defined at 454,158 m³ and 968,229 m³, respectively. These volumes consider a freeboard of 2 meters. There are no discharges of treated water in Los Fios; as such, there is no limit for cyanide in water discharges. Procedure LFIL-PO-PLPR250-003 "Solution Management in ponds due to excess water" includes the design storm event for solution ponds. The 100 year / 24-hour storm event is 150 mm, which is used in the Los Filos water balance model. Work instruction "Measurement of pH in solutions at ADR plant" indicates

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that minimum pH levels in the carbon trains is 10.2. Procedure LFIL-PO- PAPR -001 “General procedure” indicates that ideal pH in the leaching process is between 10.2 and 10.4. Procedure LFIL-PO-PLPRO800-002 “Reception, offload and transfer of sodium cyanide in Area 800” requires that pH values are at 11.5 for cyanide mixing. Procedure LFIL-PO-PLPR250-005 “Monitoring and analyses of springs, underdrains and ponds” indicates that maximum Weak Acid Dissociable (WAD) cyanide values in process ponds is 50 mg/l.

Los Filos has developed and implemented operating manuals, procedures and work instructions for cyanide related tasks, which describe the standard practices necessary for the safe and environmentally sound operation of cyanide facilities. The operation has identified equipment, personnel, and procedures for cyanide offloading and mixing activities as well as for processing facilities, heap leach facilities and all associated piping and pumps as having contact with cyanide. Procedure LFIL-PO-PLPR250-003 “Solution Management in ponds due to excess water” includes maximum operating levels for PLS, recirculation and excess ponds and how to operate, pump solutions and neutralize cyanide solutions to retain the designed storage capacity in these facilities. The pond levels are monitored online on a daily basis from the control room.

Los Filos has developed and implemented an inspection program for cyanide facilities with frequencies that varies from daily, weekly, and monthly. Process personnel conduct weekly and monthly inspections to Areas 800, 420, 250 and riser Pad 2. Weekly inspection forms include emergency showers and eye wash stations; cyanide kit; secondary containments; tanks; valves, pumps and pipes; flowmeters; among others. Monthly inspection forms include only conditions of tanks and secondary containments. Leach pad personnel conduct daily, weekly and monthly inspections to Leach Pad 1 and 2. Daily inspection forms include presence/mortalities of wildlife, ponding on leach pads and HCN formation. Weekly inspections include leaching cells, valves and pipelines in general, among others. Monthly inspections are conducted only during the rainy season for diversion channels around the leach pads. Environmental personnel conduct daily, weekly and monthly inspections to cyanide facilities including process ponds and Area 800. Daily inspections forms include presence/mortalities of wildlife at the process ponds and Area 800. Weekly inspections forms include conditions of plastic lined areas at ponds and solution channels. Monthly inspection forms include conditions of fences around the ponds. The inspection program of cyanide facilities including unloading, mixing and storage activities and frequency of inspections were found to be sufficient to assure that the operation is safe and functioning within design parameters. The auditors reviewed inspections records for the recertification period and verified that inspections are conducted on a consistent manner.

Tanks holding cyanide solutions are inspected for structural integrity and signs of corrosion and leakage as part of the monthly inspection program conducted by Process personnel. Evaluation of wall thickness for tanks integrity holding cyanide solutions are also conducted every 3 years for all tanks and every year for cyanide tanks in Area 800 (cyanide mixing tank T-100 and cyanide storage tank T-200). Inspection reports and tanks integrity tests for the recertification period were sampled and found to be complete, with the exception of some records were missing for periods of time in 2020 due to COVID-19 pandemic and a roadblock from nearby communities at the end

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of 2020. Inspection of secondary containments provided for tanks and pipelines located in Areas 800, 250, 420 and the booster station are included in monthly inspection forms, including physical integrity, the presence of fluids and available capacity. None of the containment areas has any drains to the adjacent land surface. During the field visit, the secondary containments were observed to be free of any fluids or materials stored within them. The LCRS at PLS1 (including two sub ponds: North Pregnant Pond and South Pregnant Pond) and PLS2 ponds, and the recirculation pond are monitored on a daily basis for flow and WAD cyanide. Volumes of pumped fluids and WAD cyanide concentrations are recorded daily. Examples of these inspection forms were reviewed for the recertification period. Water quality data indicate that there are cyanide concentrations detected between the liners of the recirculation pond. Los Filos has a plan in place to empty and repair the plastic liners of this pond in 2022. Pipelines, pumps and valves in the ADR plant and heap leach area, are inspected on a weekly and daily basis, respectively. Any deficiencies identified are corrected and verified in the following inspection. Inspection forms for the plant and heap leach facilities were verified for the inclusion of items related to deterioration and leakage of pipes, pumps and valves. The auditors reviewed inspection forms for the recertification period and found them to be complete. The heap leach pads, process solution ponds and excess ponds are inspected and monitored on a daily basis for critical aspects, including available freeboard. Inspections for integrity of surface water diversions channels around the leach pads and ponds are conducted on a monthly basis during the rainy season. The auditors conducted a field inspection during the site visit and verified the condition of tanks, secondary containments, pipelines, pumps, valves, water diversions, ponds freeboard and heap leach facilities. These inspections also included cyanide offloading, mixing and storage facilities. Records of the inspections conducted by Los Filos to cyanide facilities were reviewed by the auditors and were found to be complete, with the exception of some records missing for periods of time in 2020 due to COVID-19 pandemic and a roadblock from nearby communities at the end of 2020. The operation has regained back control since early 2021 to date. No further action was required.

Records of inspections are retained and were reviewed by the auditors. The inspections are documented and include date of the inspection, the name of the inspector and observed deficiencies. The inspection program also includes cyanide offloading, mixing and storage facilities. Los Filos has two mechanisms to document, track and close corrective actions identified during inspections: Corrective actions identified that are related to maintenance of equipment at the ADR plant or leach pad areas are managed by the Maintenance area. These corrective actions are managed using SAP software, where work orders are tracked, prioritized, planned and closed. The auditors verified that corrective actions related to cyanide facilities were prioritized for prompt implementation. All other corrective actions not related to maintenance of equipment that are identified through inspections conducted by either the Leach Pad or ADR Plant personnel are tracked by the each process sub-area, implemented, and followed up until closure. The auditors reviewed examples of items identified during inspections and records of the implementation of the corrective actions until they were closed.

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Los Filos has procedure LFIL-PO-PLPR420-002 “Procedure to conduct operational changes” that is used for changes in the process area. This management of change (MoC) process is not used across the mine site. The MoC process includes the identification and review of the proposed changes; analysis and evaluation of the changes by a multidisciplinary team including health, safety and environmental aspects; approval, and subsequent implementation of the changes. The process includes a format which is signed off by all areas that participated in the evaluation of the changes. The management of change process is used consistently by Los Filos process area. Examples of management of change formats were reviewed for the recertification period including the replacement of tank T-100 (cyanide mixing tank) in 2021, and the implementation in 2021 of a bypass in the ADR plant to divert solution from the trains with fine carbon into the recirculation pond. The completed forms were signed off by operational, environmental and safety staff.

Los Filos has implemented contingency procedures and work instructions for heap leach facilities and the process plant to respond to upsets in the operational water balance, deviations from design conditions, problems identified by monitoring and inspections, and to address temporary closure or cessation of the facilities. Procedures include step-by-step measures for stopping and starting the plant facilities, events of a power outage, provide response measures for emergencies related to failures of cyanide equipment, and response plans to address upsets in the process water balance. The Cyanide Emergency Response Plan dated October 2021 and procedure LFIL-PO-PLPR250-003 “Solution Management in ponds due to excess water” include detailed steps to be followed in case of a risk that could potentially exceed the design containment capacity of the process solution and excess ponds. Los Filos has several manuals, plans, procedures and work instructions for the safe operation of cyanide facilities. These documents include actions to be taken to regain control of the operation in case of upset conditions identified during cyanide facilities monitoring and inspections. In relation to a temporary closure or cessation of operations scenario, Los Filos has developed procedures that were presented to the auditors in Power Point version (Contingency Plan for eventual roadblocks, dated August 2020) that describes critical activities and personnel required to operate the plant facilities and maintain the water balance and avoid potential overflow of cyanide solution.

Los Filos Maintenance area has a mechanic, electric and instrumentation preventive maintenance program for pumps, pipelines, valves, flow meters, level sensors, pH meters, HCN sensors, sump pumps, tanks and cyanide facilities in general. The preventive maintenance program is used to perform necessary maintenance and inspect the integrity of process equipment, piping and tanks, according to a maintenance program and every time it is needed to keep equipment and facilities working properly. Preventive maintenance routes have frequencies that varies between weekly, biweekly, monthly, bimonthly, quarterly, triannual and biannual. Los Filos develops a weekly plan for preventive maintenance using SAP software. Preventive maintenance plans are generated automatically for each week. Corrective maintenance occurs as a result of work orders based on inspections. Work orders generated from inspection forms are entered in the system, including assigned priority. The auditors

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observed examples of both preventive maintenance and corrective maintenance records for the recertification period and found them to be complete.

Los Filos uses electricity from the public grid to run its operations. Necessary power for the whole operation is 14.5 Megawatts (MW), from which 8 MW are required to run the plants and leach pads. As back up power, Los Filos has two generators of 2MW each (4MW total). In the event of a power outage, these generators would start up automatically to run pumping equipment including barren to the leach pads and pregnant solution to the plant, Area 800, Area 250 including the neutralization plant, and Area 420. Los Filos has Work Instruction FL-P-ME-IT-16 "Startup backup generators for ADR plant" to manually start the generators in case they do not start automatically. In addition, Los Filos has two portable power generators for specific situations, one located at the plant (250 Kilowatts – KW) and the other one in one of the underground mines (500 KW). Los Filos has a contract in place with an external vendor (MADISA Caterpillar) to conduct preventive maintenance program of the backup generators, with frequencies that varies between quarterly, biannual and annual. Los Filos provided examples of preventive maintenance records for the power generators for the recertification period. A review of these records, confirmed that the generators are checked according to the defined frequency for fuel level, lighting, heating and are also start tested. This inspection would trigger a corrective maintenance work order if required. As mentioned above, there are some records missing for periods of time in 2020 due to COVID-19 pandemic and a roadblock from nearby communities at the end of 2020. The operation has regained back control since early 2021 to date. No further action was required.

4.2 Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 4.2

Discuss the basis for this Finding/Deficiencies Identified:

Not applicable to Los Filos. This Standard of Practice solely applies to milling operations.

4.3 Implement a comprehensive water management program to protect against unintentional releases.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 4.3

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Discuss the basis for the Finding/Deficiencies Identified:

Los Filos has a process operating facility that is a closed system with zero discharge of solutions. Any precipitation falling onto the ore heap is retained within the solution management system with no discharge or runoff. In the event of a pump or power failure, the excess ponds are sized to store draindown volume from the leach pads and two backup generators are available to provide power to the heap leach pumping operations.

At the time of the site visit, Los Filos was unable to show evidence of the development, implementation and use of a comprehensive and probabilistic operational water balance model. The document "Update of probabilistic water balance" dated 2017, prepared by Golder, provides information related to the assumptions used to implement and run the water balance using the probabilistic simulation software Goldsim; however, Los Filos is not currently using the Goldsim software to operate the water balance since 2019. Instead, an Excel spreadsheet is used to run the water balance, but it is not a probabilistic model that ensures that maximum design storage capacity is maintained at all times. Los Filos provided evidence of a technical memorandum developed by Golder, dated February 2022 called "Los Filos Heap Leach Facility Water Balance Update" that updates and calibrates the existing water balance Excel spreadsheet using the Goldsim software. Also, Los Filos sent evidence of the internal use of the Goldsim model to run the water balance of the operation. The Excel spreadsheet used to run the water balance includes the following factors: solution application rates; precipitation, evaporation and seepage rates; addition of fresh water; undiverted run-on from upgradient areas, and potential power outages.

The Excel spreadsheet used to run the water balance includes the solution rates applied to the leach pads, which is 7-8 liters/hour/m². The Excel spreadsheet used to run the water balance considers as an input the 100 year / 24-hour storm event, which is estimated at 150 mm. This value is of critical importance to ensure that overtopping of solution ponds will not occur during the operational life of the facilities, and that sufficient freeboard in Excess Ponds 1 and 2 is maintained at all times according to design parameters (2 meters). Los Filos considers the quality of existing precipitation and evaporation data in representing actual site conditions. The heap leach facilities at Los Filos have a surface water control system for controlling and safely directing runoff generated from upgradient watersheds around the heap leach and ponds. As such, upstream precipitation is not considered in the model. The Excel spreadsheet includes solution losses in addition to evaporation, such as the use of evaporation fogger units to promote evaporation of water collected in the two Excess ponds and maintain sufficient storage capacity prior to the onset of the following rainy season. The water balance does not consider other solution losses, as water from the underdrains systems are recirculated back to the process system. There are no allowable seepage losses or discharges to surface water at Los Filos. The Excel spreadsheet model can simulate a power outage by zeroing out selected pumping rates for a given period, such as 24 hours. Los Filos has backup generators that automatically starts up in case of a power outage that could put in risk the water balance of the operation, however,

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such scenario is very unlikely and could only occur in case both the primary source of power (public grid) and the emergency power generators were not operational.

Procedure LFIL-PO-PLPR250-003 "Solution Management in ponds due to excess water" includes maximum operating levels for the PLS, recirculation and excess water ponds and how to operate them to retain the designed storage capacity in these facilities. These pond levels are monitored online on a daily basis. This information is considered in the Excel spreadsheet that is used to run the water balance. As all the ponds are interconnected, critical volumes at Excess Pond 1 and 2 has been defined at 454,158 m³ and 968,229 m³, respectively. These volumes consider a freeboard of 2 meters. Inspection records for the heap leach facilities and process pond levels were reviewed for the recertification period and found them to be complete. Pond levels are monitored online on real time. The auditors reviewed monitoring data for the recertification to verify that the solution volumes in the process ponds were managed at all times according to the design criteria. According to the Excel water balance and the pond levels, the process ponds need to maintain a free volume of 545,104 m³ to contain the 100 year/24-hour storm event. Since September 2021 until the time of the field audit, the free volume in the ponds has been lower than that value, which indicates that the capacity to contain a 100 year/24-hour storm event is compromised. A similar scenario occurred in January 2021. Los Filos provided a technical memorandum developed by Golder, dated February 2022 called "Los Filos Heap Leach Facility Water Balance Update" which concludes that for this recertification period Los Filos has maintained enough capacity to contain the 100 year/24-hour storm event, and that current ponds capacity is sufficient for future years to prevent overtopping of the ponds.

Los Filos conducts daily and weekly inspections and monitoring activities to heap leach pads and ponds to ensure they are operated according to the design criteria. This frequency is considered adequate considering the high precipitation rates in the area (average of 900 mm per year). Inspections include valves, pumps and pipes; flowmeters; underdrains; LCRS; diversion canals; leaching cells; PLS, recirculation and excess ponds; among others. Records of inspection forms for the recertification period were reviewed and found to be complete, with the exception of some records missing for periods of time in 2020 due to COVID-19 pandemic and a road block from nearby communities at the end of 2020. Freeboard and solution volumes in the PLS1, PLS2, recirculation and excess ponds are monitored online in real time from the control room. For this recertification period Los Filos has maintained enough capacity to contain the 100 year/24-hour storm event, and that current ponds capacity is sufficient for future years to prevent overtopping of the ponds.

There is one weather station located next to the recirculation pond that collects meteorological data such as precipitation, evaporation, temperature and wind speed and direction. The information from this weather station is used as an input in the Excel spreadsheet used to run the water balance. In addition, there are three pluviometers in the leach pads (Leach Pad 1, Leach Pad 2, and the merger of both Leach Pads) and one more in the plant that are used as reference. The auditors reviewed on-site meteorological monitoring data and found them to be complete. The information from the weather station is collected by the environmental area, and

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once validated, is provided to Process personnel for inclusion in the Excel spreadsheet water balance; however, this information is provided on a monthly basis and is not used to operate the water balance in real time. In addition, the water balance model in Excel has not been calibrated in the last few years. Los Filos provided a Golder water balance report dated February 2022 that included a calibration of the Excel water balance model and also provided evidence of the use of the Goldsim model again for operational purposes. It is assumed that the model will continue being calibrated on a periodic basis.

4.4 Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 4.4

Discuss the basis for the Finding/Deficiencies Identified:

Los Filos operates process ponds (PLS1, PLS2, recirculation pond and excess ponds 1 and 2) with WAD Cyanide concentrations below 50 mg/l. The only facility that has WAD Cyanide concentrations above 50 mg/l is the leach pad, with free cyanide values that varies between 250 and 280 mg/l. For those open ponds that could have cyanide solution in them in contingency scenarios with concentrations above 50 mg/l WAD cyanide, Los Filos has implemented controls to restrict access of wildlife to open waters including perimeter fences, and daily inspections conducted by Environmental and Leach pad personnel. Bird deterrents have been installed by the ADR plant (Area 420) and the cyanide mixing area (Area 800), which is the location where more birds have been sighted. In addition, the PLS1 pond (including the North Pregnant Pond and South Pregnant Pond) is backfilled with gravel and is not accessible to wildlife and livestock. There is also a small open-topped concrete tank in Carrizalillo water course to capture seepage from the pad underdrains. This tank is covered by a steel grate to prevent animal access even though cyanide concentrations are very low in the underdrain seepage. The secondary containment of the process pipelines that run from the leach pads to ponds and process plant were free of process solution during the field audit.

Los Filos analyzes free cyanide on a daily basis at the process ponds (PLS, recirculation and excess ponds) and leach pad facilities. Los Filos provided analytical data of cyanide concentrations in the ponds for the recertification period. Free cyanide concentrations in the PLS-1 and PLS-2 ponds varies between 2 - 4 mg/l and 11-14 mg/l, respectively. At the recirculation pond, free cyanide concentrations are around 20 mg/l (40 mg/l WAD cyanide). The measured free cyanide concentration in a sample is estimated to be half of the WAD cyanide concentration, as the WAD cyanide component in a sample cannot be lower than the free cyanide component. The analytical data indicated that between January and February 2021, WAD cyanide concentrations reached levels above 50 mg/l in PLS2 for almost 3 weeks. Los Filos provided

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evidence of the investigation of this event and a revised procedure that indicates steps to be taken in case a similar event occurs in the future.

The two excess ponds have average free cyanide concentration of 2 mg/l. These ponds receive water from the neutralization process and then is sent to the evaporation fogger units to promote evaporation of water and maintain sufficient storage capacity prior to the onset of the following rainy season. Procedure LFIL-PO-PLPR250-005 "Monitoring and analyses of springs, underdrains and ponds" indicates that the neutralization process should reach free cyanide concentrations of 0.5 mg/l. For those open ponds that could have cyanide solution in them in contingency scenarios with concentrations above 50 mg/l WAD cyanide, Los Filos has implemented controls to restrict access of wildlife to open waters including perimeter fences, and daily inspections conducted by Environmental and Leach pad personnel.

Los Filos has implemented controls to restrict access of wildlife to open waters including perimeter fences, and daily inspections conducted by Environmental and Leach pad personnel, as described in point 4.4(1). Regardless of that, Los Filos has reported wildlife mortalities for the recertification period. In 2020, there were 9 mortalities in cyanide management areas (Area 800, ponds and leach pads). In 2021, there were 7 mortalities in cyanide management area (Area 800, excess pond and ADR plant). At the time of the audit, the site was not able to determine if the wildlife mortalities occurred in 2020 and 2021 were cyanide related, as no samples of wildlife carcasses were taken and sent for analysis. Los Filos indicated that some of these wildlife mortalities events were due to not having a perimeter fence around the two excess ponds and the PLS2 pond. In September 2021, Los Filos initiated installation of perimeter fences around these ponds. By the time of the field visit, it was observed that a few sections of the new perimeter fence were still missing to be installed, as indicated above. Los Filos expects that with this new control, wildlife mortalities will reduce in the future.

Work Instruction LFIL-IT-PAPR-002 "In case of Ponding" requires daily inspections to check for ponding and the required steps to handle surface ponding including stopping leaching in the area and, if ponding remains in the area for more than 12 hours, proceed with manual or equipment excavation to aid drainage and improve infiltration, or cover the ponded area with a liner to prevent access by wildlife. Los Filos also presented evidence that this procedure has been communicated to the workforce. During the site visit, small ponded areas were observed on the surface of the heap leach pad, which were corrected by Los Filos by the end of the field audit. In general, the pad surfaces were generally leveled and observed to be uniformly moist with minimal solution ponding observed. Leach lines were uniformly spaced, and no leaks were visible in any of the barren leach solution distribution piping.

4.5 Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water.

The operation is: in full compliance

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- in substantial compliance
- not in compliance with Standard of Practice 4.5

Discuss the basis for the Finding/Deficiencies Identified:

Los Filos does not have direct discharges to surface water. Los Filos mine operates with zero discharge of process solution.

Los Filos has two underdrain collection systems below the PLS1 pond that daylight in Cañada 23, which is a seasonal creek water course located downgradient of cyanide facilities. Water from this underdrain system is recirculated back to the process and are sampled on a daily and quarterly basis. WAD and free cyanide concentrations in these underdrains are below the laboratory detection limit (<0.02 mg/l) for the recertification period.

4.6 Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of groundwater.

- The operation is: in full compliance
- in substantial compliance
 - not in compliance with Standard of Practice 4.6

Discuss the basis for the Finding/Deficiencies Identified:

There is no designated down gradient beneficial use, nor any actual point of groundwater use, nor any applicable groundwater standard in the area surrounding Los Filos operation. Regardless of that, Los Filos has taken measures to protect groundwater and manage seepage from cyanide facilities including a composite clay and geomembrane liners in the leach pads and PLS ponds; an underdrain system below PLS1 and pumps to return underdrain waters back to the process circuit; leak collection recovery systems (LCRS) between liners of the PLS ponds and recirculation ponds; secondary containments for cyanide facilities in the ADR plant and Area 800; standard operating procedures for management of cyanide facilities, among others.

Los Filos has a groundwater monitoring network that analyses for WAD and free cyanide concentrations. There are 3 groundwater monitoring wells in the vicinity of the cyanide facilities. Groundwater well 18 is located downgradient of all cyanide facilities; well 19 is located upgradient and well 27 is downgradient of Leach Pad 1. These groundwater wells are monitored and sampled on a quarterly basis. Data collected for the recertification period indicate no detection levels for cyanide species (WAD and free cyanide values < 0.02 mg/l).

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4.7 Provide spill prevention or containment measures for process tanks and pipelines.

The operation is: in full compliance

in substantial compliance

not in compliance with Standard of Practice 4.7

Discuss the basis for the Finding/Deficiencies Identified:

Spill prevention and containment measures are provided for all cyanide mixing, storage, and process solution tanks. Los Filos has concrete secondary containments for tanks located at the ADR plant area (Area 420); cyanide mixing and storage (Area 800); barren, neutralization and recirculation (Area 250); and booster station. Secondary containment of the cyanide mixing area is connected with the recirculation pond, which provides additional capacity to contain at least 110% volume of the largest tank. In addition, there are automatic sump pumps that maintains the secondary containments free of any fluids. The concrete and sump are underlain by a 60-mil High Density Polyethylene (HDPE) liner. Between the concrete and liner, there is a competent barrier to prevent seepage to the subsurface.

The ADR plant area is contained within a concrete pad surrounded by curbs and walls, providing a competent barrier to seepage. The concrete floor is sloped to drain to two concrete sumps, where any spills or rainwater will be pumped back to the process. The sump pumps are included in the preventive maintenance routes. In addition, there is a solution channel that connects the ADR plant with the recirculation pond, providing additional capacity. The barren, neutralization and recirculation tanks are also located next to the recirculation pond which provides additional capacity to contain at least 110% volume of the largest tank. The booster station has a concrete secondary containment that drains by gravity to the lined heap leach pad through a solution channel. Secondary containment systems are inspected on a weekly and monthly basis as part of the process facilities inspection program. There are ultrasonic level indicators installed on all tanks that are continuously monitored from the process control room. These level indicators are included in the preventive maintenance routes. The auditors observed that the concrete containment systems were in good condition at the time of the audit and free of any fluid.

As stated in previous Cyanide Code recertification audit reports, secondary containments for cyanide offloading, storage, mixing and process tanks are sized to hold a volume greater than that of the largest tank within the containment and piping draining back to the tank with additional capacity for the design storm event. The secondary containment volume calculations were reviewed and deemed as sufficient. Furthermore, those containments have remained unchanged since last recertification audit. The sizing of the secondary containments for Areas 800, 420, and 250 were found acceptable during the previous recertification audits, and therefore were not re-reviewed for this recertification audit. The auditors observed that all of the secondary containments are in good condition and that no materials were stored within them to compromise their capacities. In the process area, the barren tank has the largest volume (620 m3), and has a secondary containment that is located next to the recirculation pond (179,000 m3 when empty)

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which provides additional capacity to contain at least 110% volume of the tank. Containment areas have sump pits with dedicated pumps that return collected solutions back into the process circuit. The secondary containment areas are constructed of reinforced concrete.

All containment areas have sump pits with dedicated pumps that return collected solutions back into the process circuit. There are no discharges from secondary containments to the environment. The pumps have automatic level sensors to keep the secondary containments free of water. These pumps are inspected on a weekly basis and are included in the preventive maintenance program. All tanks have level sensors. In addition, the recirculation pond provides additional excess capacity should the secondary containments be compromised. Solutions within the secondary containment for the booster station drain by gravity to the lined heap leach pad, thereby returning them to the process circuit.

Cyanide pipelines at Los Filos are located within a secondary containment provided for at the process plant (Area 420), cyanide mixing area (Area 800), barren tank area (Area 250), booster station and leach pad areas, including concrete and plastic lined channels. There are no buried pipelines in the plant area. Where necessary, pipe-in-pipe features were implemented to cross pipelines below roads. Pipelines connecting the leach pad, PLS ponds and the process plant are lined with HDPE through all its extension to convey any leaks to larger containment areas. In addition, Los Filos has implemented plastic sleeves wrapping the pipelines to prevent any high-pressure releases outside of containment. Cyanide pipelines in the leach pad are inspected on a daily basis as part of the routine inspections by plant personnel and are also included in the preventive maintenance program.

As mentioned in previous recertification audit reports, no cyanide pipelines present a direct risk to surface water as there is no surface water body that requires special protection over and above the containment measures previously described. Pipelines remain unchanged and retain the same safety features identified in previous audits.

As stated in previous audit reports, all cyanide mixing, storage and process tanks and pipelines at Los Filos are constructed of materials compatible with high pH and cyanide solutions, such as HDPE, coated carbon steel, stainless steel, and Yellow Mine PVC. The auditor did not observe any pipes or tanks made of regular (white) PVC. All tanks and pipes were well supported and in good condition.

4.8 Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 4.8

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Describe the basis for the Finding/Deficiencies Identified:

Quality control and quality assurance (QA/QC) programs have been implemented during the construction of cyanide facilities at Los Filos. The mine maintains files with QA/QC reports for the facilities constructed before the last recertification audit in 2019, which was found in compliance with the Code requirements, and has implemented QA/QC programs for new cyanide facilities built during this recertification period. New facilities constructed since the 2019 recertification audit include a replacement of the Cyanide mixing tank (T-100) in 2021; the implementation in 2021 of a bypass in the ADR plant to divert solution from the trains with fine carbon into the recirculation pond; and Phase 2 of Leach Pad merger area between Leach Pad 1 and Leach Pad 2, which was commissioned in July 2020. For the cyanide mixing tank and the bypass, the auditors reviewed QA-QC records of welding activities, quality of pipelines and tank materials and non-destructive tests. For the Phase 2 of the Leach pad merger area, the new facility was built and tested following a quality control and quality assurance program conducted by contractors Golder and GEOMECA S.A de C.V. The auditors reviewed the QA/QC documentation dated July 2020 for earthworks, foundation, installation of soil liner, fabrication and installation of geomembrane, as well as as-built drawings properly stamped and signed off by the engineer of record.

Los Filos QA/QC programs addressed the suitability of materials and adequacy of soil compaction. The mine maintains files with the QA/QC reports for its cyanide facilities including the ADR plant (Area 420), cyanide leach pad stages, PLS ponds, recirculation and excess ponds, booster station, Area 250 and Area 800. The QA/QC reports for the new leach pad area (Phase 2 Leach pad merger) include soil compaction tests, subgrade and concrete testing, fabrication material certificates and technical specifications for HDPE drainage products, liners, piping, electrical and mechanical instrumentation. In the case of the cyanide tank and the bypass at the ADR plant. QA/QC reports include records of welding activities, quality of pipelines and tank materials and non-destructive tests. QA/QC reports for facilities constructed prior to the recertification period also include non-destructive test logs, destructive test logs, vacuum tests, pre-weld tests, destructive sample tests, and repair controls. As mentioned in the previous recertification audit report, the QA/QC program and the records reviewed and verified during the audit demonstrate that the materials are according to design specifications, the compaction has been adequate, the foundations of the tanks are suitable, geomembranes are appropriate and have been placed according to design and assembly specifications.

QA/QC records for cyanide facilities are retained by Los Filos. For the new leach pad expansion (i.e. Phase 2 leach pad merger), the auditors reviewed the document "QA/QC report" signed off by contractor GEOMECA S.A. de C.V. dated July 2020. For the bypass at the ADR plant the auditors reviewed the document "Inspection on penetrating fluids in welding of 24" pipeline", dated 2021 and developed by contractor Construccion Jimenez. For the cyanide tank, the auditors reviewed information related to QA/QC of welding activities, quality of pipelines and tank materials. The auditors also verified that QA/QC records are retained for all other cyanide facilities built previous to this audit recertification period, including Leach Pad 1 (Stages 1-5 and PLS1

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and excess pond 1), Leach Pad 2 (Stages 1-3 and PLS2 and excess pond 2), Leach Pad Merger Phase 1, Booster Station, Area 800, Area 420 and Area 250. Los Filos has retained the QA/QC records referenced in the previous audits reports in bookshelves in the ADR Plant conference room. Los Filos has prepared an inventory of these documents to further ensure none are misplaced. The auditors observed the reports and randomly checked some of them to verify compliance.

Qualified engineering companies performed the QA/QC inspections and reviews during construction of the cyanide facilities at Los Filos, and prepared the final construction reports and as-built drawings certifying that the facilities were constructed in accordance with the design drawings and technical specifications. The auditors reviewed records of construction reports, including as-built drawings for the new cyanide facilities (i.e. Phase 2 leach pad merger, bypass at ADR and cyanide tank). As-built drawings were properly stamped by a qualified engineer. As mentioned in previous recertification audit reports, construction of all other cyanide facilities were reviewed by reputable engineering companies.

4.9 Implement monitoring programs to evaluate the effects of cyanide use on wildlife, and surface and groundwater quality.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 4.9

Describe the basis for the Finding/Deficiencies Identified:

Los Filos has an Environmental Monitoring Plan dated 2021 that is reviewed every year and updated as necessary. This program includes monitoring of cyanide facilities and provides details related to monitoring locations for surface and groundwater, sampling techniques, frequency of samples and parameters to be analyzed, including cyanide species (Total, free and WAD cyanide), and applicable maximum permissible limits for WAD and free cyanide. The Environmental Monitoring Plan is complemented by 11 work instructions and 5 checklists that describes sampling techniques, sampling equipment, decontamination and calibration of field equipment, preservation techniques, quality control techniques (e.g duplicate samples, field blanks, equipment blanks), chain of custody and shipping procedures. Los Filos also has procedure "Compliance with Maximum Permissible Limits in water monitoring" that includes the limits established by the Code for water (0.5 mg/l WAD cyanide and 0.022 mg/l free cyanide) and also corrective actions to be taken if values are above the permissible limits. Water monitoring activities are conducted by both Los Filos Environmental department personnel and an external lab (Mercury) contracted by Los Filos. Samples are sent to either ALS lab in Monterey or Mercury lab in Cuernavaca. Los Filos also used Platinum lab in Guanajuato until first quarter of 2021.

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Competent individuals from Los Filos mine have originally developed, reviewed, updated and approved the Environmental Monitoring Plan and work instructions. The water quality monitoring program was originally prepared (as noted in the 2010 audit) by Noelle Overdevest, a Goldcorp corporate environmental scientist with 10 years of experience, and by Alicia Sierra, a Los Filos environmental engineer with 7 years of experience. The monitoring program is revised every year and updated in-house as necessary by environmental personnel with qualifications on water sampling and monitoring activities and approved by the Environmental Superintendent. All personnel involved in the development and update of the environmental monitoring plan and work instructions are registered engineers (e.g Biologists, Chemical engineers) with more than 10 years of experience in environmental management in mining. Analytical protocols for environmental samples are provided by both labs Mercury in Cuernavaca and ALS in Monterey. The auditor reviewed letters of certification and website documentation to verify compliance.

The Los Filos Environmental Monitoring Plan and the supporting work instructions provide details related to sampling locations, preservation techniques, chain of custody procedures, shipping instructions to external labs, cyanide species to be analyzed and quality assurance/quality control requirements. The monitoring plan includes sampling frequencies for both surface and groundwater (that varies from daily, weekly, biweekly and quarterly), the suites of parameters to be analyzed (including Total, WAD and Free Cyanide) and maps showing the surface water, groundwater and underdrains monitoring locations with respect to cyanide facilities. Examples of completed chain-of-custody records for the recertification period showing proper use of the forms were reviewed.

Los Filos field data sheets for surface and groundwater samples register in writing sampling conditions including weather, presence of livestock/wildlife, anthropogenic influences, field parameters (i.e. conductivity, pH, and temperature) and groundwater levels.

Los Filos Monitoring Plan and work instructions are reviewed every year and updated as necessary and include sample locations, frequencies, and cyanide species and other parameters to be analyzed. The Monitoring Plan include sampling frequencies that varies between daily, weekly, biweekly and quarterly. Samples are sent for analysis to Mercury lab in Cuernavaca and ALS lab in Monterey. Cyanide species (WAD, free, total) are analyzed on all samples. Records were available and reviewed by the auditors for all sampling and monitoring activities. The frequencies of the monitoring activities were deemed to be appropriate by the auditors.

5. DECOMMISSIONING: Protect communities and the environment from cyanide through development and implementation of decommissioning plans for cyanide facilities.

Standards of Practice

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5.1 Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health, wildlife, livestock, and the environment.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 5.1

Describe the basis for the Finding/Deficiencies Identified:

Los Filos has a conceptual Mine Closure Plan (MCP) dated 2021 that is developed and updated in-house and approved internally. The MCP is updated as needed when there are significant changes in the operations or facilities. There is no frequency established by the local authorities for mining companies to review and update the MCP. The 2021 MCP is currently pending approval by Los Filos Senior Management. The previous version of the MCP dated 2019 was presented to the Secretariat of Natural Resources and Environment - SERMANAT (Environmental Mexican authority). Section 15 of the MCP includes decommissioning activities for cyanide facilities such as the ADR plant (Area 420), barren tank area (Area 250), cyanide mixing and storage area (Area 800), booster station, heap leach pads 1 and 2, process and excess water ponds and solution channels. At closure, once gold recovery ceases, all processing plant items and steel structures will be decontaminated. All concrete surfaces will be thoroughly washed down to remove any residual material. Decommissioning activities include decontamination of equipment (tanks, pipelines, pumps, and valves), rinsing of heap leach pads, neutralization of process water for 2 years after operations ceases, final decommissioning and disposal of cyanide facilities, and/or reclamation of facilities. There is no solid cyanide storage at Los Filos and as such, it is not considered as a reclamation item in the MCP. No water treatment needs for cyanide facilities are considered for the post closure phase.

The conceptual 2021 MCP includes an implementation schedule with proposed timeframes and activities between 2030 and 2032 for closure of all cyanide facilities. Current schedule considers the following: 2030: Decommissioning of Area 800, Area 420, booster station, PLS1 and PLS 2, and initiate rinsing of leach pads. 2031: Finalize decommissioning activities for Area 420 and refinery, start decommission of excess ponds 1 and 2 and Area 250, and finalize rinsing of leach pads. 2032: Finalize decommissioning of Area 250, Excess pond 1 and recirculation pond.

Los Filos reviews the conceptual MCP and updates it periodically. The MCP is updated on an as-needed basis (when closure strategies significantly change). The 2019 MCP was presented to SERNAMAT. There is no frequency established by the local authorities for mining companies to review and update the MCP. The 2021 MCP is currently pending approval by Los Filos Senior Management. In addition to that, Equinox Gold corporate office requires its operations, including Los Filos, to review and update its Asset Retirement Obligation (ARO) / Standard Reclamation Cost Estimator (SRCE) cost estimation for the mine, including cyanide facilities decommissioning costs. These costs are reviewed and updated every year and submitted to the Corporate office, where it is audited financially by an external party (KMPG).

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5.2 Establish a financial assurance mechanism capable of fully funding cyanide-related decommissioning activities.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 5.2

Describe the basis for this Finding/Deficiencies Identified:

The conceptual 2021 MCP outlines the cost for full implementation of the site-wide closure and reclamation plan for existing facilities, including all cyanide facilities. The total closure cost, including concurrent reclamation, final reclamation and post closure activities, has been estimated at US\$ 51.27 MM (millions). From that amount, US\$ 6.7MM are considered for management of process solutions at closure including water treatment, decontamination, forced evaporation and pumping. The 2021 MCP assumes that the heap leach pad will be rinsed for chemical stability and that solution (draindown from heap leach and rinsate water from decontamination of equipment at the ADR plant) will be treated. The decommissioning and cyanide decontamination estimates provided by Los Filos were generated as a function of the full fund third party implementation costs, using the Standard Reclamation Cost Estimator (SRCE) model that was developed for the State of Nevada, USA. The costs were estimated using third-party rates from local contractor companies used by Los Filos for earthworks, concrete, infrastructures and dismantling activities.

As mentioned above, Los Filos reviews the conceptual MCP and updates it periodically. The MCP is updated on an as-needed basis (when closure strategies significantly change). The 2019 MCP was presented to SERNAMAT. The 2021 MCP is currently pending approval by Los Filos Senior Management. Additionally, according to Equinox Gold requirements, Los Filos reviews and updates its closure costs on an annual basis including decommissioning for cyanide facilities as part of its Asset Retirement Obligation (ARO) cost estimation exercise. The auditor reviewed the previous versions of the SRCE model. The most recent closure cost estimate for 2020 is US\$51.70 MM, which is slightly higher than the previous 2019 amount of US\$51.08 MM.

As local and central authorities has no requirement for financial assurance of closure activities, Los Filos has established self-insurance as a financial assurance mechanism for closure activities, which includes decommissioning of cyanide related facilities estimated at US\$11.55 MM. The auditors reviewed a letter from KMPG dated November 24th, 2021, for the review of Los Filos current closure cost estimates as of December 31st, 2020, verifying its conformance with the financial tests for a self-guaranteed mechanism to cover the estimated costs for cyanide-related decommissioning activities. Financial evaluation methodology used by the external financial auditor includes the assessment of the Asset Retirement Obligation (ARO) liability in the period it was incurred. The liability equals the present value of the expected cost of

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retirement/remediation. An asset equal to the initial liability is added to the Balance Sheet, and depreciated over the life of the asset. The result is an increase in both the assets and the liabilities. The auditors reviewed the statement from KPMG and confirmed that the self-insurance was calculated including the estimated decommissioning cost for cyanide facilities only (US\$11.5 MM) and that the operation has sufficient financial strength to fulfill the self-insurance obligation. The auditors also verified the professional certification of the financial auditor.

6. WORKER SAFETY: Protect workers' health and safety from exposure to cyanide.

Standards of Practice

6.1 Identify potential cyanide exposure scenarios and take measures as necessary to eliminate, reduce and control them.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 6.1

Describe the basis for the Finding/Deficiencies Identified:

Los Filos has established operating procedures, work instructions and related checklists and work permits to ensure that worker exposure to cyanide is minimized and/or controlled when performing tasks as unloading, mixing, plant operations, entry into confined spaces, and equipment decontamination. The site incorporated work instructions which are more detailed documents than the operating procedures, describing step by step the activities to be performed by operators.

All these procedures and instructions are detailed for the risks involved with each task and adequately describe safe work practices. These documents also describe detail task specific Personal Protective Equipment (PPE). Work permit systems have been developed for more general activities which apply across various areas of the plant and/or the mine operation. These include, for example, lock out/ tag out/try out, hot work and confined space entry permits.

Procedures were reviewed and found to be sufficiently detailed to enable a safe operation and to minimize worker exposure. Verification also included worker interviews while conducting field inspections. Pre-start checklists for cyanide mixing and preparation in Area 800 (Cyanide preparation yard) were also reviewed by the auditor, certifying that operators are required to identify whether they have the required PPE to perform the task at hand and/or identify any upset conditions which may require additional precautionary measures.

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Los Filos also requires that plant personnel should fill out a Job Safety Analysis (AST) before conducting the task, which includes PPE, HCN levels, air exhaust, closed caption camera system, eye wash stations, calibration of the HCN sensor, pH verification, cyanide emergency response kit, among others.

When conducting maintenance work in equipment in contact with cyanide solution, operators also perform an AST, where they should also identify risks and pre-work verifications as the eye wash stations, emergency exits, and to verify the availability of the Cyanide kits.

Workers at the operation are given the opportunity to provide input to procedures by participating in induction (new workers) and refresher training in Operating Procedures and Work Instructions (Module 3 of their training programme) conducted by a senior Supervisor of the specific area, therefore, there is the opportunity to consider workers' input. Also by the use of a 5-point Safety Card in which during the interaction between supervision and workers, they can identify improvements and recommendations that includes procedures. The site conducts a Safety Committee meeting, which include operator representatives, provide the opportunity to discuss procedures. Finally, Los Filos has the Management of Change (MOC) Procedure for making changes and modifications to the plant's operating method and uses it regularly to evaluate changes with respect to cyanide releases and exposures.

6.2 Operate and monitor cyanide facilities to protect worker health and safety and periodically evaluate the effectiveness of health and safety measures.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 6.2

Describe the basis for the Finding/Deficiencies Identified:

Los Filos has determined different pH levels for cyanide solutions during mixing and production activities as part of their operation philosophy to prevent the generation of HCN gas. In Area 800 (Cyanide Preparation Yard), LFIL-IT-PLPRO800-011 "pH measurement on ADR process plant solution" describes the distribution of concentrated cyanide solution (30%) from the distribution tank and LFIL-PO-PLPRO800-002 "Reception, offload and transfer of sodium cyanide in Area 800" which requires pH values above 11.5 when sparging, mixing and distributing cyanide solution to the plant. To help control pH, barren solution is used to mix and dissolve solid sodium cyanide briquettes in the isotainer and sodium hydroxide is added to rise the pH to the desired value. pH readings are taken manually every time a cyanide preparation is performed. The auditor verified records for 2019, 2020 and 2021 and certify that solution was raised to 11.5 prior to mixing.

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In the ADR processing circuit, Los Filos has established a work instruction LFIL-IT-PLPR250-011 "Measurement of pH in solutions at ADR plant" which indicates that minimum pH levels in the carbon trains is 10.2. In case values go below 10.2, process plant should add sodium hydroxide at certain proportions in the process plant pumping system that goes to the leach pad. Procedure LFIL-PO- PAPER -001 "General procedure" indicates that ideal pH in the leaching process is between 10.2 and 10.4.

Los Filos has established the following areas where workers may be in risk of exposure to HCN gas:

- Area 800 Cyanide preparation yard
- Area 420 ADR Plant – Carbon in Columns area
- Area 250 Barren, Recirculation and Leach Pads area

Fixed HCN gas monitors (Honeywell) are installed in the Cyanide Preparation Area and Carbon in Columns circuit. Workers are also required to wear personal HCN monitors (Drager). Los Filos has determined appropriate controls including the use of appropriate PPE. Operating procedures, which specify the PPE required, have been developed and implemented in these areas.

Los Filos was applying a more stringent HCN limits than those required by ICMI. Contingency Procedures in the Process Plant and the Cyanide Emergency Plan indicates that HCN values of 2.3 ppm or above will trigger the first alarm to advise the process work area operators, and 3.7 ppm or above which requires that all workers will evacuate the process plant. However, after the field audit, Los Filos decided to conduct a MOC (Management of Change) to update the limits aligned with the Cyanide Code standard of 4.7 ppm HCN for an 8-hour exposure and 10 ppm HCN for evacuation. The auditor verified that all operating procedures and work instructions have been updated, as well as the Emergency response Plan, staff and workers have been informed and employees are receiving refresher training on these new procedures during the month of February 2022.

If Hydrogen Cyanide gas levels trigger the 4.7 ppm alarm on the portable and fixed HCN devices the procedure indicates that the operator or operators in the area should evacuate the zone immediately, communicate the levels to the plant supervisor or control room, and to evaluate the immediate causes and make operational adjustments. If HCN levels exceed the 10 ppm value, the area has to be evacuated.

Los Filos uses fixed and personal (portable) monitoring devices to confirm that controls are adequate to limit worker exposure to hydrogen cyanide. HCN alarms have now been updated to 4.7 ppm and 10 ppm, respectively. The auditor has verified instrumentation records with those updates. Los Filos has four fixed HCN Detectors (Honeywell) located in Area 420 (acid wash area), Area 420 Cribas (CIC circuit) and Area 800 Cyanide preparation (02). Los Filos also have 48 Portable devices: 04 Drager XAM 5000 and 44 Drager PAC 7000.

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The Auditor verified the following evidence: procedures and work instructions, pH readings, HCN monitoring devices at Area 800, Area 420 (ADR plant) Leach Pad and process ponds covering the recertification period.

HCN fixed and portable monitors are calibrated on a regular basis and records are kept by the Process team. The Process Instrumentation team coordinates calibration of fixed monitors every 6 months according to work instruction "Calibration of Honeywell HCN Monitor". Maintenance is done at the same time the calibration is being performed. This applies for both the fixed and portable devices. The auditor verified that bump tests are also set to be performed on a monthly basis. The auditor also confirms that Los Filos calibration frequency for the fixed and portable hydrogen gas monitors meets the frequencies recommended by the manufacturers.

The auditor verified during the field inspection that appropriate signage is displayed at the plant entrance and throughout the various facilities to alert personnel of the presence of cyanide, access restrictions and the required PPE for the area. In addition to identification of cyanide areas and PPE requirements, signage is also used to restrict eating, smoking and open flames. Drinking signs, were not encountered during the first day of field inspection, however, Los Filos took immediate action and by the last day of the audit, all risk areas were installed with "no drinking signs". Warning signs are posted in Spanish, the language of the workforce and located in areas where cyanide solution is mixed and used.

Los Filos uses Sodium cyanide from Chemours (now Draslovka) since this requirement was established. Colorant dye is added to solid cyanide at Draslovka San Luis de Potosi cyanide transfer plant from boxes to isotainers so that during the mixing operation, the high strength (20-30%) cyanide solution turn into a red color solution.

Los Filos has installed several fixed safety showers, eyewash stations and fire extinguishers in Area 800 Cyanide Preparation and Area 420 ADR Process Plant where there is a potential for exposure to cyanide. The Leach Pad and Process Ponds have portable eyewash stations. These are checked as part of pre-work inspection checklists to ensure that they are operational and that water flows are adequate.

Sodium Bicarbonate fire extinguishers are strategically located throughout the operation and verified on a monthly basis by the Emergency Response Team. Two extinguishers were observed without inspection tags for 2022 during the first day inspection to the Process Plant, however the site took immediate action to install the appropriate tags for 2022.

Los Filos has established a color coding for concentrated cyanide solution (magenta/purple) and barren cyanide solution (yellow) that was observed by the auditor following the cyanide pipeline path from the cyanide preparation area and the feeding points in the ADR plant and the barren booster and recirculation tanks.

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Pipelines and tanks that contain cyanide or cyanide solution are labeled to enable plant personnel to identify its content. Labeling is typically located at places of frequent access by personnel, reasonable distance to be able to track the lines and identity contents. During the walk through to the ADR plant and Area 800, the auditors observed the color-coding panel identifying barren solution with the high concentration color code (purple). During the final field audit day, the mine sent pictures showing all signaling panels indicating the correct name and color. No additional action was required. All other areas observed during the audit had appropriately identified tanks, pipes, and cyanide storage areas.

For pipelines, flow direction arrows are used to allow personnel to identify the flow and possible exposures and/or response requirements for leaks and/or maintenance work.

Los Filos maintains Safety Data Sheets (SDS) for sodium cyanide from manufacturers (Chemours) in hard copy and in Spanish in areas such as the Area 800 Cyanide Preparation and the ADR Process Plant. SDS were also found in the control room and the clinic. In addition to the SDS sheets, signage is available to alert personnel to chemicals and required emergency response requirements in the high-risk cyanide areas.

The site has maintained an Incident Reporting, Analysis and Investigation Procedure and a Guidance (updated in 2020) which describes that in the event of an incident, how it will be notified, and how the staff proceed to control the situation. Subsequently, the investigation of the incident is done to identify root causes and ensuring that corrective actions are determined.

During the recertification period Los Filos experienced two incidents that were reported to the Federal Environmental Protection authority PROFEPA:

1. A Barren Solution spill occurred on July 12th, 2019, due to a pipe from the ADR process plant to the recirculation pond was found out of contention because of vibration and an inappropriate attaching and coupling within the geomembrane contention channel. Barren solution affected approximately 800 m² of natural soil on the south side of the recirculation pond. Cyanide spill did not leave the site fence limits; however, it was reported within 24 hours to the Mexican Authorities and conducted a detailed investigation.

2. A Cyanide spill on December 16th, 2020. Due to an overflow of a Barren Booster/Recirculation Tank located in the upper east part of the Leach Pad # 2, cyanide solution saturated a flat area downgradient and overtopped the geomembrane berm and barren solution impacted approximately 200 meters of a diversion channel within the Los Filos property. Cyanide spill did not leave the site fence limits; however, it was reported within 24 hours to the Mexican Authorities, and conducted a detailed investigation.

The auditor reviewed the root causes of both incidents, and the mitigation actions plans, and found out that in all cases, these actions were implemented.

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6.3 Develop and implement emergency response plans and procedures to respond to worker exposure to cyanide.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 6.3

Summarize the basis for this Finding/Deficiencies Identified:

Los Filos has made available oxygen, resuscitators, antidotes, radios, telephones, and alarms in critical areas. First aid kits are located in the ADR Plant Access, Instrumentation workshop adjacent to Area 800 Cyanide Preparation, ADR Plant Emergency Response Container Plant, Medical Center, Leach Pad and Leach Pad solution ponds.

First aid kits include oxygen tank with pressure gauge, masks with reservoir bag, amyl nitrite ampoules, activated carbon, manual resuscitator, gauze, and gloves. During the audit field inspection on day 1, the auditor encountered the First Aid kits with cyanide antidote consisting of amyl nitrate ampoules. When checking the expiration date of the ampoules, these were recently expired in all cases. The amyl nitrite ampoules were immediately removed by Los Filos from all first aid kits as an immediate measure. After the field audit, the site purchased new amyl nitrite kits from a different provider and has provided evidence that the new ampoules are now part of all the antidote kits available at site. For cyanide specific physician treatment, antidotes are located at the Los Filos Medical Center and consists of the use of sodium nitrite and sodium thiosulfate for case of intoxication due to absorption or inhalation. For cases of ingestion, the procedure indicates the use of activated carbon.

The auditor verified that all First Aid Kits in the field and antidote kits in the medical center are stored at the correct temperature and that the antidotes (amyl nitrite, sodium nitrite, sodium thiosulfate and activated carbon) have not expired. The auditor also verified amyl nitrite ampoules are stored as directed by the manufacturer. Emergency brigade staff performs frequent inspections of the ambulances, cyanide kit and oxygen located in the medical clinic. Inspections are documented.

Los Filos medical department has developed the procedure "Medical treatment of Patient Intoxicated with Cyanide" which describes what to do in case of an emergency involving cyanide poisoning, and it also serves as an emergency response guideline for brigade members, including the scene assessment, safety aspects, first aid response, cyanide poisoning symptoms and use of antidotes by medical staff. The procedure also includes responsibilities, intoxication levels and medical attention. The first responder in the place initially will aid the victim securing the area and administering oxygen. Los Filos has also developed a specific written plan to respond to cyanide exposures: Emergencies with Cyanide. This emergency response plan

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describes the guidelines to follow in case of an emergency related to sodium cyanide, to minimize impacts to people, the environment, property, and operations.

To provide first aid and medical assistance to workers exposed to cyanide, has one onsite fully equipped medical facility (Medical Clinic). The clinic is located about an 8-minute vehicle ride from the ADR process area, and it provides medical response to cyanide exposure incidents. Los Filos has a full time doctor on call as part of the staff, two permanent nurses and six Paramedics that are part of the Emergency response Brigade.

In the medical clinic, there are available beds, oxygen tubes, resuscitator, and other equipment for critical care patients. The auditor verified that Sodium thiosulfate and sodium nitrite are kept at a controlled temperature inside the medical center.

The Procedure "Medical treatment of Patient Intoxicated with Cyanide" indicates that, in the event of a cyanide exposure where the victim, once stabilized, requires medical attention beyond the capabilities of the on-site medical clinic, the medical department will transport the victim to qualified off-site hospitals (i.e., the Social Security hospitals in Iguala and Chilpancingo).

Los Filos has maintained formalized arrangements with medical facilities regarding the potential to further evaluate patients that have been exposed to cyanide and that has been previously stabilized at the medical facilities on-site. Therefore, the offsite facilities do not treat victims directly for cyanide exposure. These medical facilities are the Social Security (IMSS) Medical Center in Iguala and the Social Security (IMSS) Medical Center in Chilpancingo. These medical centers could be used to assist in emergency response in the route to the mine.

Los Filos has determined that its medical facilities have qualified staff, adequate equipment, and expertise to respond effectively.

7. EMERGENCY RESPONSE: Protect communities and the environment through the development of emergency response strategies and capabilities.

Standards of Practice

7.1 Prepare detailed emergency response plans for potential cyanide releases.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 7.1

Describe the basis for the Finding/Deficiencies Identified:

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Los Filos has developed several plans and procedures that address potential accidental releases of cyanide. The auditor verified the Los Filos Cyanide Emergency Response Plan which describes specific response actions by the Emergency response Team onsite. It establishes measures in the case of cyanide gas release or spills of cyanide solution or solid cyanide. The mine also has a General Emergency Plan, which is a general plan that establishes a series of guidelines to follow in case of any emergency. The Emergency Plan has several annexes that describe emergency response protocols, minimum emergency response materials, roles, and responsibilities among other elements. The Emergency Plan also consider different categories of emergency based on a risk assessment matrix, first aid and medical treatment procedures.

Los Filos plans for emergency response list the various credible event scenarios for the site inclusive of cyanide incidents such as cyanide spills, exposures, and transportation accidents.

- a) Los Filos has a procedure LFIL-PO-PLPRO800-001 to identify catastrophic incidents, including release of hydrogen cyanide in the cyanide preparation area which includes HCN gas generation, pipe line ruptures, tank failures, and flow diagrams on how to respond. LFIL-PO-PLPRO250-002 cover contingences on area 250, which includes leaching pads, pumping recirculation, and raiser system. LFIL-PO-PLPRO420-003 Contingencies in Area 420 covers the ADR plant.
- b) Los Filos Emergency Plan 004 covers the scenario of a CN transportation Incident inside the property (iso container tipped over) between the security gate and the ADR plant.
- c) Procedure LFIL-PO-PLPRO800-001 for contingency in area 800 (Cyanide preparation) cover potential cyanide release scenarios during unloading and mixing.
- d) Cyanide Emergency Plan has a paragraph that indicates in case of fires and explosions involving cyanide, not to use water or CO2 fire extinguishers.
- e) There is an specific section on the Cyanide Emergency Plan that include these failures causing spills on soils and water generated from pipe brakeage, valve or tank ruptures.
- f) Overtopping scenarios are covered on procudre „Excess Water Management“ LFIL-PO-PLPRO250-003 which includes moniotring, reporting to authorities, remediation plan and alternative water source for the community of Mazapa.
- g) Los Filos procedure Energy Source Failure FL-P-ME-PT-03 describes the activation of back up energy generators.
- h) Infiltration Control Procedure LFIL-PO-PAPR-006 takes into account possible scenarios of cyanide solution infiltrating in natural ground.
- i) Failures or problems in the neutralization circuit are covers on procedures: LFIL-PO-PLPRO250-002 and FL-P-ME-PT-03.
- j) Los Filos do not produce tailings. Regarding Leach Pads, the plan includes posible scenarios like significant slides and actions taken for emergency communication and control notifications.

The sodium cyanide supplier for Los Filos is Chemours (now Draslovka). Draslovka contracts Transportes Especializados Segutal for terrestrial cyanide transport. Agreements between Los Filos and Draslovka are in place, whereby these organizations and their transporters are

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responsible for shipping of cyanide to site. This responsibility extends to consideration of transport routes, storage and packaging, the condition of transport vehicles and response in the event of an emergency or release during transport.

Also, Los Filos Cyanide Emergency Plan #004 indicates that Chemours (Draslovka), in case of an incident on the route, will immediately notify the mine representatives and communicate if they require support from the emergency response team of Los Filos. The plans also provide for responses to offsite incidents that involve hazardous materials that are being transported to site. In the event of an emergency or incident within the mine property, Los Filos would respond to such an incident.

Los Filos Cyanide Emergency Plan #004, The General Emergency Plan and the specific cyanide contingencies procedures, describe detailed response actions to cyanide incidents.

- a) In case of a cyanide incident leaving the property boundary, the only community that could be affected is Mazapa (downgradient about 2 kms) and the procedure indicates possible evacuation requirements in coordination with authorities. Los Filos has Emergency Brigade members that belong to this community.
- b) Section 3.4 of the Plan describe the Cyanide Intoxication scenarios. Los Filos has 6 cyanide first aid kits in the field and also antidote kits in the medical center.
- c) Control and mitigation measures of a cyanide related incidents are covered under procedures for Cyanide Contingencies in Area 800, Area 250 and Area 420.
- d) Containment measures are also covered under section 4 of the Spill Remediation Procedure. Regarding the assessment, investigation and prevention of future releases is covered under the Incident Reporting Procedure LFIL-PO-SHGE-015.

7.2 Involve site personnel and stakeholders in the planning process.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 7.2

Describe the basis for the Finding/Deficiencies Identified:

Among the mechanisms used by Los Filos to obtain input from its workforce in their emergency response planning documents, are the daily pre-work meetings and the Health and Safety (H&S) meetings with contractors. Also, Los Filos has Emergency Brigade members that are part of the communities around the mine (Mezcala, Carrizalillo and Mazapa). There are 13 responders from Communities (out of 22 Hazmat responders).

No outside stakeholders have been involved on the development of the Emergency Plan since they do not have designated responsibilities under the plan. However, the site maintains

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frequent communication with the external responders of Iguala and Chilpancingo, where emergency procedures were discussed with community leaders.

Los Filos has on-site capabilities for dealing with all possible cyanide related incident scenarios and will take full responsibility for response to a cyanide release within the facility. Nevertheless, Los Filos has also established formalized arrangements with offsite medical facilities in Iguala and Chilpancingo regarding the potential to treat patients that have been exposed to cyanide. Los Filos has the policy to stabilize victims onsite prior to transferring to off- site facilities.

Los Filos met with community members and leaders in Mezcala, Carrizalillo and Mazapa in early 2022 to make them aware of the risks of cyanide, possible contingency scenarios, and responses. Topics on the agenda included the use of cyanide in gold mining and its potential cyanide risks, measures to prevent damage to flora and fauna, past incidents, and control measures.

Los Filos has provided cyanide response training to local entities in 2021, including Civil Protection, Red Cross, Iguala Technical university (paramedics). The auditor verified training records conducted in October 2021. Training was not performed in 2020 due to the Covid 19 restrictions.

The site also maintains a social engagement program (described in principle 9) that allow communication and feedback between communities, stakeholders, and the mine. These include topics as the transportation and use of sodium cyanide and provides general emergency response written information

7.3 Designate appropriate personnel and commit necessary equipment and resources for emergency response.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 7.3

Describe the basis for the Finding/Deficiencies Identified:

Los Filos Emergency Response Plan covers the following elements:

- a) A Brigade Chief/Commander position and also the incident commanders (paramedics) as alternates when the Chief/Commander is not on site.
- b) Los Filos General Emergency Plan identify the Emergency Brigade members, which consists of a Commander, 6 paramedics and 17 brigade members trained for Hazmat emergencies. Depending on their shift, the site has normally 7 brigade members, and as a minimum, will have 5 per shift.

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- c) An Emergency Brigade Training Plan and Program (2021 and 2022) includes hazmat training during the months of January and February. It also has First Aid training in August, Vehicle Rescue Operations in the month of January.
- d) 24-hour cell phone numbers for all paramedics and the brigade members. Vehicle Control (Dispatch) receive the initial emergency communicate on and contacts the Commander and/or their alternate and /or the paramedics.
- e) Roles and responsibilities of the Brigade Commander, the paramedics and brigade members.
- f) Emergency response equipment for each area where cyanide is used and for the emergency response warehouse (container). Verification was done during a field inspection.
- g) Emergency Response Inspection Program conducted on a monthly basis which includes a section for Hazmat equipment: SCBA, Air tanks, container, compressor, decontamination station. Ambulances are inspected on a weekly basis
- h) Los Filos has not assigned external responders a role on the Emergency response Plan.

Los Filos does not use off-site responders for cyanide emergencies. However as noted in standard of practice 7.2, the site has established formalized arrangements with off-site medical facilities in Iguala and Chilpancingo regarding the potential to treat patients that have been exposed to cyanide. Los Filos has adequate staff, equipment, and expertise to respond effectively to emergencies. External entities have not participated in mock drills or implementation exercises because the Emergency Response Plan does not assign them a role on the site.

7.4 Develop procedures for internal and external emergency notification and reporting.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 7.4

Describe the basis for the Finding/Deficiencies Identified:

Los Filos General Emergency Plan include procedures and an up-to-date contact information table to notify regulatory agencies, civil defense, municipal and provincial authorities, cyanide supplier and transporter (Chemours and Segutal), local police, off-site medical facilities, ambulance/red cross, and other stakeholders. It also has an up-to-date list of Los Filos management staff. The auditor verified that the list has the correct contact names by verifying names.

The Emergency Plan also includes a list of contact information for community representatives in the nearby areas as Mazapa, Mezcala, Carrizalillo and Xochipala. Media communication

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procedures are also included in the plan. Section 7.9 describes the function of the Local Public Information Officer that will be the “official spokesperson” in case of an unwanted event.

During the field audit, the auditor did not find a specific document to notify ICMI of a significant incident, however Los Filos management staff took immediate action and has now established a requirement to notify the ICMI in case of a significant cyanide incident. The auditor verified updated changes in the Incident Reporting and Investigation Standard (page 2) and the Cyanide Emergency Plan (page 65) indicating that in case of an emergency the Incident Commander should communicate the ICMI (International Cyanide Management Institute) of a significant cyanide related incident (as indicated in ICMI’s Definitions and Acronyms document).

As indicated in standard of practice 6.2, during the recertification period, Los Filos experienced two incidents that were reported to the Mexican environmental authority PROFEPA. Los Filos has determined these incidents were not considered “significant cyanide incidents” and did not require reporting to the ICMI cyanide related incident to ICMI.

7.5 Incorporate remediation measures and monitoring elements into response plans and account for the additional hazards of using cyanide treatment chemicals.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 7.5

Describe the basis for the Finding/Deficiencies Identified:

Los Filos Cyanide Emergency Response Plan describe specific remediation measures for the following release scenarios:

- a) Los Filos Cyanide Emergency Response Plan section 3: “Remediation Plan in case of CN spills” covers the recovery actions for cyanide spills, in the case of spills on soils describes neutralization actions using Hydrogen Peroxide. Hydrogen Peroxide is stored at an isolated tank located in the ADR plant and prepared to a 50% dilution concentration to be used as a neutralization agent for CN spills on soils, where there is no risk of contact with open waters.
- b) Decontamination procedure is included in section 3.7 of the Cyanide Emergency Plan. The CN release in the process plant scenario describe in detail the clean up, neutralization steps and decontamination of soils up to the point where acceptable CN trace levels are detected. It also indicates how to determine the sampling locations, spacing, depth and analysis to be performed (WAD cyanide gr/kg) in the internal lab, and to repeat the procedure until the analysis come back with a cyanide concentration lower than 0.5 gr/kg of CN WAD. In the case of a spill on water, Los Filos applies procedure GC-P-GE-04 Water Monitoring, analyzing, free cyanide, WAD cyanide and Total cyanide downstream of the affected area to determine the extension. The procedure

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- clearly states the prohibition of using neutralization agents as Sodium Hypochlorite, Ferrous Sulphate or Hydrogen Peroxide for spills on open waters.
- c) Soils disposal after cyanide related incidents is included in Procedure "Infiltration of CN Spill on Soil". All contaminated debris (soils) will be disposed in the Heap Leach Pads.
 - d) Los Filos uses bottled water for its mine site drinking water supply. There are no community or resident water supplies that would be at risk to potentially require an alternative water supply

7.6 Periodically evaluate response procedures and capabilities and revise them as needed.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 7.6

Describe the basis for the Finding/Deficiencies Identified:

Los Filos General Emergency Response Plan and the Cyanide Emergency Plan are revised at least once a year; however, some annexes are regularly reviewed (for example, the contact telephone numbers) or every time there are significant changes and new information, after the occurrence of an unwanted event, mock drills or changes in compliance requirements or regulations. The latest version reviewed for both plans was dated October 2021.

Los Filos conducts annual mock drills based on likely release/exposure scenarios to test the response procedure, and incorporates lessons learned from the drills into its response planning.

In July 2019 a Cyanide mock drill was conducted in area 800 (CN mixing and preparation) involving an intoxicated maintenance operator by cyanide solution absorption during a maintenance repair in pipes T-100 al T-200. The drill report includes improvement plans related with communication protocols.

In 2020 no cyanide related mock drill was conducted mainly due to Covid 19 pandemic social distance restrictions in order to avoid people congregation.

In August 2021 a cyanide mock drill was performed in the access road km 80 with one cyanide box dropping from the shipping container and affecting natural soil, getting in contact with water and generating HCN gas. The drill report indicates one improvement action plan related with refresher training to emergency responders regarding the correct use of type C suites.

In 2021, Los Filos conducted another drill related with an intoxicated worker by cyanide gas inhaling in Area 420 due to a filter clogging and the inappropriate use of water on a highly concentrated solution. The auditor verified that all improvement action plans generated from drill mocks have been closed.

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The General Emergency Response Plan states that a review session should be held after an actual cyanide-related incident occurs, after mock drills or changes in compliance requirements or regulations. The Auditor verified that both documents have been periodically updated and/or revised. It is important to mention that the two cyanide-related incidents that occurred during this ICMC recertification period (described in the standard of practice 6.2) triggered an evaluation and revision of the emergency procedures, considering that both incidents were controlled and remediated by the Process team. The General Emergency Plan and Cyanide Emergency Plan was reviewed in the 4th quarter of 2019 and the latest was performed in October 2021.

8. TRAINING: Train workers and emergency response personnel to manage cyanide in a safe and environmentally protective manner.

Standards of Practice

8.1 Train workers to understand the hazards associated with cyanide use.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 8.1

Describe the basis for the Finding/Deficiencies Identified:

All personnel and contractors working for Los Filos should receive formal training on cyanide according to their position and tasks. Los Filos has a Training Department and an Induction Training program (reviewed for 2021) which includes 2 days for open pit and 4 days of induction training for underground mining. Normally there is an induction program once per week.

New employees and contractors should receive the following category of training:

- Module 1 applies to general site staff and contractors where the 2.5 hours presentation covers cyanide risks, exposures, symptoms, environmental impacts, and an overview of the Code.
- Module 2 applies to workers that will be working in areas exposed to cyanide and its risks and covers First Aid and Emergency Response scenarios. It takes approximately 2 hours to complete the Course. Training is performed by the Medical Department, the conduct the test and returns results to the training team.
- Module 3 involves training on specific job procedures and work instructions in Area 800 (Cyanide preparation), Area 420 (ADR Plant), and Area 250 (Leach Pads and Ponds).

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Module 1 “General Cyanide Training” and Module 2 “First Aid and Cyanide Emergency” are refreshed on an annual basis to employees and contractors through either safety sessions with supervisor or classroom training. The auditor found limited training material in 2020 due to mine suspension by Covid-19, road blockages and work union strikes.

Refresher training is conducted to all personnel and contractors that could be exposed to Cyanide. Training could last approximately 4 hours. For other workers with functions and roles that do not require to be in contact with cyanide, the mine provides short refresher courses that includes some power point slides on Cyanide hazards. Refresher course does not include an evaluation/test.

The auditor reviewed the main excel training matrix for the Refresher Module 1 y 2 and check registers for four different workers that were interviewed during the audit and found refresher training records for all of them. A training matrix have been developed which identify mandated courses and frequencies.

The auditor verified that training records, including refreshers and cyanide hazard training for Health, Safety, Environmental, Emergency Response, Supply Chain personnel, the process plant operators and contractors are retained based on regulatory requirements, in the form of hard copies and also an electronic version stored. Training records identify the trainer, trainee, topics covered, date and sign off sheet. This requirement was verified through review of a sample of records for one worker in the safety and health department, one in the warehouse, one in the process plant and one in maintenance, covering the recertification period. The auditor found limited training material in 2020 due to mine suspension by Covid-19 (April-July 2020), road blockages (July – August 2020) and work union strikes (October- November 2020), so records for 2019 and 2021 were audited.

8.2 Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 8.2

Describe the basis for the Finding/Deficiencies Identified:

All personnel in job positions including cyanide mixing, processing, leaching and maintenance, receive training on how to perform their assigned tasks with minimum risk to worker health and safety. The training Department maintains up to date an excel matrix with Work Instructions and Procedures Training Program for Module 3, which covers job specific training. All operating areas have identified the procedures and work instructions related with their activities and the training plan involved. For example, for workers in:

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- Area 250: training includes 6 procedures (with a certificate) and 14 work instructions (with an evaluation)
- Area 420: training includes 7 procedures and 20 work instruction
- Area 800: training includes 8 procedures and 14 work instructions

The work procedures and work instructions training are performed once a year. In general, task training does not apply to contractors because they are not responsible for operating the cyanide facilities.

Los Filos has developed a Cyanide Code Training programme (updated in September 2021) which is designed to build awareness and competency for various activities that are directly and indirectly related with cyanide handling. The program lists which departments must be trained on which procedures and area under Module 3 (i.e., instrumentation, plant maintenance, pad, ADR Plant, environment, crushing, and warehouse). The procedures and work instructions include details on how to safely conduct each cyanide-related task.

Training elements for each specific job are covered by the supervisor in charge of the training session. Personnel are trained following the work procedures, and the work instructions which include the step-by-step process to perform the job. These work procedures include the objective, required PPE, decontamination requirements, risks associated with the cyanide task and the individual task specific steps. Also, Los Filos has done a train the trainer course provided by Chemours to all supervisors (in May 2021) related Cyanide Intoxication (1 hour training). The auditor verified Chemours train the trainer records for two senior supervisors.

All personnel in job positions that involve cyanide handling are required, prior to working with cyanide, to receive training on how to perform their assigned tasks with minimum risk to worker health and safety (Module 2 and 3). Module 2 (Emergency procedures) and Module 3 (task training) are obligatory for all employees in the process area according to local regulations. Staff must receive the corresponding task training before being allowed to work with cyanide, in an unsupervised manner and staff must successfully complete the training before they work independently.

Los Filos requires and provides refresher training for safe handling of cyanide, first aid for cyanide intoxication, cyanide emergency response and operational procedures/work instructions to assure employees and contractors continue to perform their jobs in a safe and environmentally protective manner. The program requires annual refresher training in Module 2 and Module 3, which includes physical and chemical characteristics of cyanide, cyanide handling, monitoring, pH control levels, exposure limits, exposure symptoms, PPE, treatment, rescue equipment, safety showers, emergency warning systems, evacuation, disposal, and spill procedures.

To evaluate the effectiveness of training related to cyanide, written tests are taken after a classroom training session for work instructions to demonstrate understanding of the material. A certificate of completion and verbal understanding is undertaken after signing the relevant

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standard operating procedure to indicate understanding. The auditor verified that procedures are not evaluated, however, their respective work instructions (which describe step by step the concepts covered in the procedure in much more detail) are in all cases evaluated with a test to demonstrate understanding. Also, after training, Los Filos supervisors perform a task observation for new employees, to determine when they are ready to work independently.

Los Filos has recently conducted a Cyanide Training Effectiveness Survey (January 2022), that involved approximately 118 workers among supervisors and workers mainly from the process plant area. The average result of the evaluation for all workers has been 7.1/10. The objective behind this survey/evaluation will be to identify the aspects that will need additional reinforcement during annual refresher training.

Cyanide training records in Los Filos are retained in the Training department files (for all employees and contractors). A training matrix in excel is constantly updated to assist training personnel in their training progression and refresher exercises. The auditor found limited training material in 2020 due to mine suspension by Covid-19 (April-July 2020), road blockages (July – August 2020) and work union strikes (October- November 2020), so records for 2019 and 2021 were audited.

8.3 Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 8.3

Describe the basis for the Finding/Deficiencies Identified:

The auditor verified that plant operators and maintenance personnel responsible for cyanide preparation, processing, heap leaching, and maintenance are trained in decontamination and first aid procedures for cyanide release incidents. The training program states all process personnel must take initially Module 2, which covers the Emergency Response including cyanide release procedures, first aid for exposures, as well as control and cleaning measures for environmental releases.

Personnel also receive training on Module 3 (task specific training), which includes procedures as: “How to respond to Contingencies in Area 420”, “How to respond to Contingencies in Area 800” and finally “How to respond to Contingencies in Area 250, Recirculation pumps and Raiser pad”.

The Emergency Brigade Commander, paramedics and responders are all trained in the Emergency Response Plan according to an annual training program and schedule which

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includes hazmat and cyanide related emergency response. The auditor verified the latest training conducted in January 2022 by an external certified instructor from the Emergency Response School in Guanajuato Mexico. The 16-hour course was received by the Brigade Commander, his alternate, the paramedics, and brigade responders. The auditor also verified training performed by a certified hazmat specialist from the Universidad Tecnologica del Norte - Guerrero in 2019.

All the Emergency Response Brigade members are all made up of supervisors and workers who have voluntarily committed to the program and trained in the use of necessary response equipment as self-contained breathing apparatus and suits, decontamination equipment, extraction equipment and firefighting equipment. Formal brigades are in place for different scenarios as fire, hazmat, first aid, vehicle incidents and confined space. Emergency responders are available on all shifts. Knowledge and competence level is tested through tests, field practice and drills.

Los Filos has provided evidence that their own responders are prepared for cyanide-related emergencies involving preparation, processing, leaching and maintenance activities, having adequate staff, equipment, and expertise to respond effectively to emergencies. The site does not require off-site emergency responders, nevertheless, it has established formalized arrangements with off-site medical facilities in Mazapa, Iguala and Mexico City regarding the potential to treat patients that have been exposed to cyanide.

Los Filos personnel receive annual specific and general refresher training. Training topics include cyanide management, safe cyanide handling, first aid for cyanide intoxication, cyanide SDS, General Emergency Plan, Cyanide Code, management, equipment decontamination and plant emergency stop, among others. All staff should receive Modules 1 and 2 each year, which contain basic response measures for exposures and releases. Additional personnel at the ADR Plant and Leach Pad are designated as first responders.

Records of emergency response training are retained on files by the Training Department and the Emergency Brigade. These include training conducted by internal and external parties. The auditor verified training conducted by Iguala Technological University in October 2021, with participation from the Emergency Brigade Commander and responders. Topics include cyanide response management, first aid for cyanide intoxication, use of portable HCN monitors, cyanide code, equipment decontamination, spill remediation, plant emergency stop, among others. In all cases, records have names of the employee and the trainer, the date of training, the topics covered, and an evaluation.

9. DIALOGUE AND DISCLOSURE: Engage in public consultation and disclosure.

Standards of Practice

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9.1 Promote dialogue with stakeholders regarding cyanide management and responsibly address identified concerns.

- The operation is: in full compliance
 in substantial compliance
 not in compliance with Standard of Practice 9.1

Describe the basis for the Finding/Deficiencies Identified:

Los Filos has developed a series of programs which allows community members with an opportunity to communicate issues or concerns regarding cyanide management. The local communities are Carrizalillo, Xochipala, Mezcala and Mazapa. Carrizalillo is located upstream of the mine. Mazapa is located 12 kilometers downstream along the Arroyo Carrizalillo. Mezcala is located near the mine camp in a different basin of the mine. Los Filos has cooperation agreements with these 3 communities, however, based on a risk assessment conducted at the mine, the community of Mazapa has been prioritized after the pandemic restrictions and a cyanide presentation was conducted in September 2021. Los Filos maintains communication through meetings with Mezcala, Xochipala, Carrizalillo and Mazapa twice a month to follow up on all kind of social agreements.

During the month of February 2022, Los Filos initiated a communication campaign with communities informing their “Good Environmental Practices at Los Filos” which includes cyanide controls and contingency scenarios/mitigation actions for the Communities of Xochipala, Carrizalillo, Mazapa and Mezcala. It is also important to mention that approximately 80% of Los Filos workforce comes from the neighboring communities. The auditor verified the records of attendance and the materials handed to the community members.

Other programs used at Los Filos for stakeholder communications is to allow community members to present their issues and concerns following a Grievance Mechanism procedure LF-P-DC-02 that enables the site to receive, process, manage and resolve written or verbal complaints and grievances in a timely and consistent manner. Grievances for 2021 were reviewed on the Matrix software system. None of them correspond to cyanide concerns or issues.

Other ways of communication are the local radio station “La Filosita” as well as dedicated phone lines, social network sites and Whatsapp numbers.

9.2 Make appropriate operational and environmental information regarding cyanide available to stakeholders.

- The operation is: in full compliance
 in substantial compliance

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not in compliance with Standard of Practice 9.2

Describe the basis for the Finding/Deficiencies Identified:

Los Filos distributes Responsible Cyanide Information to the neighboring communities of Carrizalillo, Xochipala, Mezcala and Mazapa. Due to the pandemic restrictions, there is no records of cyanide management communication provided to communities, however the site started to implement campaigns back in 2021 with the community of Mazapa (September 2021).

During the month of February 2022, Los Filos initiated a new communication campaign with communities informing their "Good Environmental Practices at Los Filos" which includes cyanide controls and contingency scenarios/mitigation actions for the Communities of Xochipala, Carrizalillo, Mazapa and Mezcala. It is also important to mention that approximately 80% of Los Filos workforce comes from the neighboring communities. The auditor verified the records of attendance and the materials handed to the community members. Los Filos also provides information on Cyanide management on printed pamphlets environmental, safety, health, transportation, and emergency response topics.

Los Filos Community Relations staff stated that there are no native languages spoken in the communities and that most people speak, read, and write in Spanish. Illiteracy is around 25%, so Los Filos provides information verbally and/or visually via meetings, slideshows, and videos described in requirement 9.1. These are mainly the community meetings every two weeks, annual fairs, community visits, messages through local radio "La Filocita" and Responsible Mining meetings held in 2022.

Los Filos makes publicly available information on issues and exposures, as necessary, through public statements, regulatory reports, Equinox Annual Responsibility Report and the Equinox website.

During the recertification period, Los Filos:

- a) Has not experienced incidents resulting in hospitalization or fatality.
- b) Has not experienced incidents resulting in releases that leave the mine site fences of property.
- c) Has not experienced incidents resulting in significant adverse effects to health and the environment.
- d) The site experienced two cyanide release incidents outside the leach pad borders but within the mine property, not affecting water canals or water streams. These two incidents are described in standard of practice 6.2. Los Filos has presented evidence that these two incidents were communicated to PROFEPA, who makes the incidents information available to the public. Also, The Equinox Los Filos Responsibility Report for 2019 and 2020 describe these incidents under the transparent environmental report section.

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- Finally, the mine has presented the remedial actions of these incidents in communication sessions with neighbouring communities on February 2022.
- e) Has not experienced incidents resulting in exceedances of applicable cyanide limits.

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