

## **SEABRIDGE GOLD'S DISCRIMINATION, BULLYING, HARASSMENT AND VIOLENCE POLICY**

Seabridge is committed to providing all employees with a workplace free from Discrimination, Bullying, Harassment, Sexual Harassment, and workplace Violence. All employees have a right to work in an environment that is free from intimidating, threatening, or disruptive behaviour and it is the responsibility of every employee of Seabridge to cooperate in reaching this goal.

Seabridge will not tolerate, and this Policy prohibits: Discrimination, Bullying, Harassment, Sexual Harassment, and workplace Violence as serious acts of misconduct. Employees engaging in such conduct will be subject to disciplinary action, up to and including termination of employment or denial of site access privileges for violation of this Policy.

This Policy applies to all employees of Seabridge regardless of title or position and the term "Employee" in this Policy includes employees of contractors and consultants while working at our work sites.

**Certain of our affiliates or joint ventures, may maintain their own policies on discrimination, bullying, harassment sexual harassment and workplace violence to conform to the laws of the jurisdictions in which they operate, however we will use all rights and powers at our disposal as significant shareholders to achieve policies that will, in principle, align with this policy.**

### **DEFINITIONS**

**"Discrimination"** means treatment or consideration of, or making a distinction in favour of or against, a person or thing based on the group, class, or category to which that person or thing belongs including race, colour, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, sex (gender), sexual orientation, gender identity, gender expression, age and conviction of a criminal or summary conviction offence unrelated to employment.

**"Harassment"** and **"Bullying"** can take many forms and includes, without limitation, inappropriate conduct or comment by a person towards a worker that the person knew or reasonably ought to have known would cause that worker to be humiliated or intimidated. Examples of conduct or comments that might constitute Bullying or Harassment include verbal aggression or insults, calling someone derogatory names, harmful hazing or initiation practices, vandalizing personal belongings, and spreading malicious rumours.

**“Sexual Harassment”** is defined as one or a series of incidents involving unsolicited or unwelcome sexual advances, requests for sexual favours, or other physical or verbal conduct of a sexual nature. Examples of behaviours which constitutes Sexual Harassment include, but are not limited to, the following:

- a) Sexually suggestive or obscene comments, innuendos or gestures;
- b) Unwelcome physical contact;
- c) Unwelcome sexual flirtations, advances or propositions;
- d) Sexist jokes causing embarrassment or offence, told or carried out after the joker has been advised that they are embarrassing or offensive, or that are by their nature clearly embarrassing or offensive;
- e) Persistent unwanted or uninvited contact, correspondence or attention;
- f) The display of offensive material of a sexual nature;
- g) Graphic or degrading comments about an individual’s appearance;
- h) Statements or other conduct which leads an individual to believe that sexual favors or acts will lead to preferential employment treatment; or
- i) Statements or other conduct which leads an individual to believe that refusal of sexual favors or acts will lead to negative treatment or denial of opportunities.

**“Violence”** includes:

- a) Physically harming or attempting to physically harm another person;
- b) Engaging in behaviour that creates a likelihood or reasonable fear of injury to another person or damage to property;
- c) Possessing, brandishing, or using a weapon while on Seabridge property, while engaged in Seabridge business, or while at Seabridge Events, regardless of whether an individual has a valid permit to carry a weapon (including weapons stored in any vehicle or container) or the brandishing or use of any object in a manner that may be perceived as harmful or threatening;
- d) Engaging in behaviour that intentionally injures or threatens to injure another person or damage property; and
- e) Engaging in behaviour that incites, promotes or advocates the use of Violence regarding any workplace issue, the workplace generally, or any person or group of persons covered under this Policy.

## **RESPONSIBILITIES**

Seabridge will utilize its best efforts to ensure that no employee or contractor is subjected to Discrimination, Bullying, Harassment, Sexual Harassment, or workplace Violence at any of our places of employment. Our management is committed to keeping this Policy and seeing that no employee or contractor's employee causes or participates in the Bullying, Harassment or Sexual harassment of, or Discrimination or Violence against, another employee.

This Policy is designed to ensure that all complaints and concerns respecting Discrimination, Bullying, Harassment, Sexual Harassment, or workplace Violence will be dealt with promptly and fairly. Any employee with concerns or a complaint is expected to bring the issue to the attention of either a supervisor or manager pursuant to the procedures as set forth below. All reports of Discrimination, Bullying, Harassment, Sexual Harassment, or workplace Violence will be investigated, even if the reporting individual does not desire any follow-up.

### ***SEABRIDGE MANAGEMENT WILL:***

- Assist individuals who have concerns or complaints regarding Discrimination, Bullying, Harassment, Sexual Harassment, or workplace Violence.
- Ensure that appropriate procedures are in place to minimize the risk to our employees and contractors from Discrimination, Bullying, Harassment, Sexual Harassment, and workplace Violence including the reporting of any incidents to the relevant authorities, where necessary.
- Convey information about this policy and the process of making a complaint to all employees and ensure that employees are trained in recognizing and responding to situations involving Discrimination, Bullying, Harassment, Sexual harassment, or workplace Violence.
- Help a complainant to move through the process of this Policy.
- Ensure that every reported incident of Discrimination, Bullying, Harassment, Sexual Harassment, or workplace Violence is investigated and potential areas for improvement are identified.
- Maintain confidentiality of communication relating to inquiries and complaints, unless under an obligation to disclose the information by law or under this Policy.

### ***EMPLOYEES AND CONTRACTORS OF SEABRIDGE ARE:***

Responsible for upholding this Policy and as such are required to be familiar with and follow the procedures put in place to ensure that the workplace and working environment remains free from Discrimination, Bullying, Harassment, Sexual Harassment, and workplace Violence by:

- Promoting respect for the dignity of all employees;
- Not engaging in Discrimination, Bullying, Harassment, Sexual Harassment, or workplace Violence;

- Participating in the instruction on prevention of Discrimination, Bullying, Harassment, Sexual Harassment and workplace Violence;
- Immediately reporting all incidents of Discrimination, Bullying, Harassment, Sexual Harassment, and workplace Violence to their manager or supervisor.
- Not encouraging, inciting, or otherwise participating in any form of Discrimination, Bullying, Harassment, Sexual Harassment, or workplace Violence;
- Removing themselves, when possible, from situations and immediately reporting them to their immediate Supervisor/Manager.

## **RETALIATION**

No employee or contractor shall be penalized, reprimanded, or in any way criticized when acting in good faith while following the procedures for addressing situations involving Discrimination, Bullying, Harassment, Sexual Harassment, and workplace Violence pursuant to this Policy.

Employees and contractors may be disciplined if they act in a violent or otherwise confrontational manner when addressing or confronting a situation of Discrimination, Bullying, Harassment, Sexual Harassment, or workplace Violence and such acts are not acts of self-defence of themselves or of others.