

SEABRIDGE GOLD'S SUSTAINABILITY POLICY

As a commercial enterprise in the natural resource extraction industry, Seabridge Gold strives to achieve the highest operating standards, assessing and mitigating our impacts on the physical environment and the communities in which we operate. To confirm and maintain our recognized, industry-leading practices in environmental, social and governance matters, our Executive Management and Board of Directors have formalized our commitment to sustainability and the integration of sustainability principles into all of our activities.

We recognize that sustainability involves protecting environmental values at our projects and contributing to the health, economic and social well-being of our employees and local communities and taking action to support national and global priorities. A sustainable human environment requires us to consider issues such as cultural respect, inclusiveness, diversity, and broad participation in the opportunities and benefits which derive from our efforts.

Our Sustainability Policy therefore rests upon three critical pillars: the economy, society, and the environment, sometimes referred to informally as profit, people and planet. **We see these pillars as interdependent, each necessary and supportive to the other.**

This Sustainability Policy is a guiding document for short- and long-term planning, the execution of our work programs, and is applicable to all Seabridge employees. We believe that embedding sustainability into the core of our business and governance structures will enhance our efforts to manage risk, ensure due respect for stakeholder interests, and ultimately keep us on a course for maximizing shareholder value.

This Sustainability Policy is a commitment by Seabridge to:

1. Ensure we have an Executive Management and Board of Directors comprised of professionals who, collectively, have the required skills, knowledge and breadth of experience to establish and sustain industry leading standards of environmental, social, and governance (ESG) approaches applicable to Seabridge's business and evaluate their effectiveness.
2. Fully comply with applicable legislation and regulatory processes while monitoring and responding to changes in the regulatory landscape and actively working with regulators to address their questions and providing information they require in a timely manner.
3. Seek guidance where needed from qualified experts to assist in responding to rapidly evolving areas such as new technologies and social goals such as climate change, and equity, diversity, and inclusion.
4. Integrate sustainability into all aspects of the Company's business planning by implementing and maintaining a sustainability management system that incorporates ESG considerations into our business.
5. Monitor, evaluate, and report on our ESG performance to regulators, investors, and the public in a transparent manner and draw lessons from such evaluation that can be applied to future planning.
6. Maintain hiring and training programs and contracting procedures which support a more diverse workforce and management team and strive for onsite workforces which reflect the composition of our local communities by developing talent through skills training and education, strengthened by mentoring and coaching.

7. Ensure all employees and contractors are aware of the Company's sustainability program and foster a company culture that is safe for them to speak up and contribute to building a more accountable workforce.
8. Respect local communities and the rights of Indigenous Peoples. Proactively engage with local communities and Indigenous Peoples with the intention of building lasting relationships. Require senior management to meet regularly with these communities to listen to their needs and concerns.
9. Be stewards of the environment when we acquire and develop resource interests, recognizing that our stakeholders, the inhabitants of the communities in which we are located, and future operators of our sites will inherit the decisions and actions we make today.
10. Find, explore, and develop our projects in a manner that optimizes sustainability factors such as energy efficiency, carbon footprint and recycling while minimizing use of fossil fuels, waste, land disturbance and pollution. Execute our exploration activities consciously to mitigate risks to local ecosystems and protect water resources and biodiversity. Integrate sustainability issues such as climate change and mine closure into mine design and feasibility studies to ensure positive legacies for future operators, local communities, and ecosystems.
11. Select operating partners that are able and willing to honour our commitments to stakeholders. Ensure that our partners, including contractors, suppliers, or project developers and mine operators are made aware of our goals for sustainability. Implement systems and safeguards to promote the continuation of those commitments.

In addition to the adoption of this Sustainability Policy by the Board, the Board has assigned responsibility for implementation of this Sustainability Policy to a senior officer of the Company.

The Sustainability Committee will review this Policy annually, or earlier if it determines necessary, which review will include an assessment of the effectiveness of this Policy.



Rudi P. Fronk – Chairman and CEO
August 9, 2021