SEABRIDGE GOLD

ENVIRONMENTAL POLICY

(Amended May 13, 2025)

Seabridge Gold Inc. (Company) strives to be a leader in environmental management, to meet or surpass regulatory standards, and to minimize impacts to the natural environment in the context of our business. To meet this objective, the Company is committed:

Environmental Culture: to engraining environmental protection, including the protection of Indigenous heritage sites, as a cornerstone of our Company culture. The Company's directors, officers, employees and contractors are all tasked with promoting and managing an environmentally responsible culture.

Environmental Management: to integrating environmental considerations into our day-to-day activities, including exploration, operations and closure planning and assessing potential environmental impacts and risks on the ecosystem in our project designs.

Compliance, Monitoring and Reporting: to designing our projects to meet or surpass regulatory requirements and to implement environmental management systems and programs to monitor the environmental performance of our projects. Our environmental performance is monitored and assessed against applicable regulatory and local community standards and certain elements of it are reported under internationally recognized frameworks, including the Global Reporting Initiative and Sustainability Accounting Standards Board, all with a view to identifying opportunities for improvement.

Climate Change: to evaluating our resilience and recovery to climate related risks and improving our ability to quantify our carbon emissions to facilitate the pursuit of near- and long-term reductions, and to the transparent reporting on our progress. Climate-related risks and mitigation opportunities are considered when developing our project designs.

Biodiversity: to mitigating the risk of substantive biodiversity impacts by minimizing our project footprints and surface disturbance within the context of our business.

Water and Waste Management: to developing our water and waste management plans in tandem to mitigate risk, to furthering the efficient use of resources, and to protecting local communities and the environment within the context of our business. Hazards of waste from our projects are assessed in accordance with regulatory requirements and standards and we seek to manage their reuse, recycling and disposal in a safe and responsible manner in the context of local capacity.

Restoration: to the extent that is practical and commercially reasonable, to reclaiming progressively areas of disturbance and remediating disturbed natural ecosystems following their period of use to enable them to revert to their original state or an alternative sustainable state, and to ensure that associated financial assurances are adequate.

Education and Training: to providing training to keep our relevant employees abreast of changes to environmental regulations and industry standards as well as technological developments relating to mitigation strategies.

Indigenous and Stakeholder Engagement: to working with Indigenous groups, government agencies, the public, and other stakeholders to foster good communication and achieve a shared understanding of the Company's environmental management approach, its responsibilities and project designs.

Reporting to the Sustainability Committee: to presenting environmental issues to the Sustainability Committee to further monitoring of performance under this Policy and to assessing corrective actions that could improve our performance.

It is the responsibility of every employee of the Company and its contractors to carry out their daily activities in accordance with this Environmental Policy.