

SEABRIDGE GOLD

Respectful Workplace Policy and Program

Seabridge Gold Inc. and its affiliated companies are pleased to provide the Respectful Workplace Policy and Program (“**Policy**”).

Seabridge Gold Inc. and its affiliated companies (“the **Company**”) are 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 the Company in reaching this goal.

The Company will not tolerate, and this Policy prohibits: discrimination, bullying, harassment, sexual harassment, and workplace violence. 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 the Company as defined under Definitions - Section 1.

1.0 DEFINITIONS

“**Bullying and harassment**” means any inappropriate conduct or comment made by a person towards an employee that the person knew or reasonably ought to have known would be unwelcome or would cause that employee to be humiliated or intimidated and includes sexual harassment, but excludes any reasonable action taken by a manager or supervisor relating to the management and direction of employees or the place of employment.

“**Cyberbullying**” is discrimination, bullying or harassment that occurs through the use of electronic communication, including e-mail, text messaging, and social networking. This can involve the posting of comments, rumors, photos, and the sending of threatening messages.

“**Discrimination**” is making a distinction, whether intentional or not, but based on grounds set out in the applicable human rights legislation which imposes burdens, obligations, or disadvantages on an individual or group not imposed upon others. In general, human rights legislation prohibits discrimination based on age; ancestry; colour; race; citizenship; ethnic origin; place of origin; political belief; disability; family status; marital status (including single status); gender identity and gender expression; record of offences, unrelated to employment; religion; sex (including pregnancy and breastfeeding); and sexual orientation.

“**Employee**” means all employees of the Company, regardless of status or position, including temporary workers. It also includes directors and officers of the Company, as well as contractors, consultants, and their employees. The use of the term “employee” in this Policy will not create an employment relationship where an employment relationship does not already exist.

“Sexual Harassment” means engaging in a course of vexatious comment or conduct against a worker in a workplace because of sex, sexual orientation, gender identity or gender expression, where the course of comment or conduct is known or ought reasonably to be known to be unwelcome. It is also includes making a sexual solicitation or advance where the person making the solicitation is in a position to confer, grant or deny a benefit or advancement to the worker and the person knows or ought reasonably to know that the solicitation or advance is unwelcome.

“Workplace Violence” is the threatened, attempted, or actual exercise of physical force in the workplace by a person against an employee that causes or could reasonably cause physical injury. It can also include a statement or behaviour that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker:

2.0 EXAMPLES OF DISCRIMINATION, HARASSMENT, SEXUAL HARASSMENT AND WORKPLACE VIOLENCE

The examples below provide more context to the definitions, but it is not an exhaustive list of every situation.

Examples of personal harassment that are not based on a ground protected by human rights legislation, but which would still be prohibited under this policy are:

- Insults or verbal aggression, such as yelling, swearing, name-calling, and intentional humiliation.
- Multiple or destructive “pranks” or “practical jokes” directed towards an individual, or targeted group of individuals, including harmful hazing or initiation practices.
- Vandalizing or otherwise damaging or defiling personal belongings, work area or work product.
- Isolating or ignoring, or unwarranted exclusion from organized team building activities.
- Spreading malicious rumours (regardless of whether they are believed to be true).

Examples of sexual harassment include:

- Making or threatening reprisals after a negative response to sexual advances.
- Making unwelcome sexual advances, propositions, flirtations, or repeated unwelcome requests for or efforts to make social contact, including asking questions about sexual conduct or sexual orientation or spreading rumours about such information.
- Making comments about an individual’s body, sexual prowess, sexual orientation, gender identity, or sexual or gender deficiencies or using sexually degrading or vulgar words to describe an individual or making derogatory sexual or gender-based comments
- Displaying or distributing sexually suggestive or gender-based objects, pictures, posters, cartoons, letters, or e-mails.

Examples of harassment based on other enumerated grounds of discrimination include:

- Offensive jokes related to race or nationality.
- Racial slurs or commentary.
- Display of literature or materials (including electronic documents such as email, texts, and social media posts) that promote the supremacy of one race or ethnic group or belittle a race or ethnic group.

The above examples of harassment, bullying and discrimination may occur in multiple manners, including through cyberbullying.

Examples of prohibited workplace violence include:

- Hitting, shoving, tripping, pushing, kicking, assault and sexual assault.
- Physical horseplay, threatening gestures, or physical practical jokes.
- Yelling, swearing, and threatening the well being of a person.
- Displaying objects for the purpose of which is to intimidate or cause harm to a person.

3.0 RESPONSIBILITIES

Seabridge will utilize its best efforts to ensure that no employee 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 should bring the issue to the attention their supervisor or one of the alternates set out 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.

3.1 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 from discrimination, bullying, harassment, sexual harassment, or 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.

- Ensure that employees are trained in recognizing and responding to situations involving discrimination, bullying, harassment, sexual harassment, or workplace violence.
- Help a complainant through the process of this Policy and Program.
- 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 to the extent set out in this Policy.

3.2 EMPLOYEES AND CONTRACTORS OF SEABRIDGE ARE:

Responsible for upholding this Policy and implementing the Program and as such are required to be familiar with and follow the procedures put in place to ensure that the workplace remains free from discrimination, bullying, harassment, sexual harassment, or workplace violence by:

- Promoting respect for the dignity of all employees;
- Not engaging in discrimination, bullying, harassment, sexual harassment, or workplace violence;
- Participating in Company training on discrimination, bullying, harassment, sexual harassment, and workplace violence;
- Immediately reporting all incidents of discrimination, bullying, harassment, sexual harassment, or workplace violence;
- 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.

4.0 ZERO TOLERANCE

The Company has **zero tolerance** for any form of discrimination, bullying or harassment (including sexual harassment), or workplace violence. Employees who engage in discrimination, bullying or harassment (including sexual harassment), or workplace violence are in violation of this Policy and will be subject to corrective action.

5.0 RETALIATION PROHIBITED

The Company prohibits retaliation against any person who in good faith reports discrimination, bullying or harassment (including sexual harassment), or workplace violence or participates in an investigation of such incidents or complaints. Retaliation against a person for reporting discrimination, bullying or harassment (including sexual harassment), or workplace violence, or for participating in an investigation of an incident or complaint is a serious violation of this policy and, like discrimination, bullying or harassment (including sexual harassment), or workplace violence, will be subject to corrective action, as set out below.

6.0 FALSE CLAIMS

Employees who intentionally make false, vexatious, or unsubstantiated allegations of discrimination, bullying or harassment (including sexual harassment), or workplace violence, will be subject to discipline up to and including dismissal and may be held financially responsible for the costs of the investigation.

7.0 WHAT TO DO IN CASE OF WORKPLACE VIOLENCE

Because of its potential for immediate and serious harm, procedures for responding to workplace violence are different from responding to discrimination, bullying or harassment (including sexual harassment).

Employees should use their common sense and in the event of an emergency, should immediately contact building or site security and/or the appropriate emergency service (police, fire, or ambulance Telephone 9-1-1).

Take all necessary and reasonable steps to ensure your own safety and the safety of others.
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All instances of actual workplace violence or potential risks that may lead to workplace violence should be immediately reported to a supervisor.

The Company periodically assesses the risks of workplace violence that may arise given the nature of the Company's workplace, the type of work performed and the conditions under which work is performed. The Company will institute measures to control any identified risks of workplace violence. This information will be provided to the Company's workplace health and safety representatives and/or committee. The Company will reassess the risks of workplace violence as often as is necessary to ensure that this Policy continues to protect employees from workplace violence.

The Company will provide information relating to persons with a history of violence where:

- employees may reasonably be expected to encounter such persons in the performance of their duties and responsibilities; and
- there is a potential risk of workplace violence because of interactions with such persons.

The Company will only disclose personal information that is reasonably necessary to protect employees from such persons.

Employees must inform the Company of any domestic violence that might jeopardize the safety of the employee or other employees in the workplace. Employees who apply for or obtain a restraining order or peace bond which lists the workplace as being a protected area must provide the Company with a copy of the restraining order or peace bond and any other relevant documents or information the Company requests. If the Company is aware that domestic violence is likely to expose employees to workplace violence, every precaution reasonable in the circumstances will be implemented to protect employees in the workplace. The Company will only disclose personal information that is reasonably necessary to protect employees from domestic violence.

8.0 WHAT TO DO IN CASE OF DISCRIMINATION, BULLYING OR HARASSMENT (Including Sexual Harassment)

If appropriate, the Company encourages employees to address any conduct that they consider to be inappropriate or unwelcome in an informal manner by advising the individual of the concern and asking them to stop.

Where the informal approach is inappropriate or does not work, employees should report incidents or complaints of discrimination, bullying or harassment (including sexual harassment), verbally or in writing to their direct supervisor as soon as possible after experiencing or witnessing an incident. This allows the incident to be investigated and addressed promptly.

If it is not appropriate or possible to approach the direct supervisor (e.g. that supervisor is away, or is involved with or would reasonably be believed to have a bias in the harassment), the employee may report to:

- a) Their department head;
- b) The Human Resources department;
- c) Senior management; or
- d) The Legal Department.

8.1 Contents of Report

In reporting discrimination, bullying or harassment (including sexual harassment), employees should include the following information:

- Name of the employee who has allegedly experienced discrimination, bullying or harassment (including sexual harassment);
- Name of the alleged harasser;
- Names of witnesses, or other persons with relevant information to provide about the incident;
- Details of what happened including:
 - Date or dates of the incident(s)
 - Location(s) of the incident(s)
 - Details of the incident(s)
- Any supporting documents (emails, handwritten notes, photographs etc.) that the employee who complains of harassment may have in their possession that are relevant to the complaint
- A list of any documents that a witness, another person or the respondent may have in their possession that are relevant to the complaint

The Company provides a form (copy attached to this Policy) to assist employees file reports.

The Company may ask employees to provide additional details to supplement an initial report, including requesting the employee to provide those details in writing.

9.0 INVESTIGATION

9.1 Pre-Investigation

If a supervisor, manager, or member of the human resources team becomes aware of an incident or complaint, the Company will take appropriate interim measures for the protection of employees, including removing employees from the workplace and placing employees on an administrative leave of absence pending and during the investigation.

Once a supervisor, manager or member of the human resources team become aware of an incident or complaint, the Company will ensure that an investigation appropriate in the circumstances is conducted in a fair and timely manner.

9.2 Investigators

The Company will choose an appropriate investigator based on the nature of the incident or complaint. An investigator may include a member of the Company's Human Resources or Legal departments or a qualified external person. If the incident or complaint involves a member of senior management or Human Resources an external qualified person will be retained.

9.3 Confidentiality

Any person who participates in an investigation into an incident or complaint of discrimination, bullying or harassment (including sexual harassment), or workplace violence will not discuss the investigation with any other person, except with the person's immediate family and to the extent necessary to obtain legal advice about such person's rights.

The Company will not disclose any information obtained about an incident or complaint of discrimination, bullying or harassment (including sexual harassment), or workplace violence except where disclosure is necessary for the purposes of protecting employees, investigating the incident or complaint, or taking responsive measures in relation thereto or as otherwise permitted by this Policy. Note that in almost all incidents and complaints, the Company will have to disclose to the party being accused of a breach of this Policy (a **"respondent"**) and potential witnesses enough information about the complaint to allow them to give meaningful evidence, either in response (for the respondent) or generally (for witnesses). This may involve or result in identification of the person making the complaint or the person who is the victim of discrimination, bullying or harassment (including sexual harassment), or workplace violence (a **"complainant"**).

It is common in most complaints for the investigator to collaborate with senior management, Human Resources, and legal counsel, and share information about an incident, complaint and an investigation. If a member of senior management or Human Resources is named as a respondent or potential witness, they would not participate in this collaboration.

The result of an investigation into an incident or complaint will be shared with the complainant and respondent in writing.

9.4 Timing of Investigation

Upon being notified of an incident or complaint, Human Resources will facilitate a timely investigation that is appropriate in the circumstances. The investigation will generally be completed within sixty (60) days, unless there are extenuating circumstances (i.e., illness, complex investigation) warranting a longer investigation.

9.5 Investigation Process

The Company will tailor the nature of the investigative process to the circumstances of each case. An investigation may include:

- interviewing the complainant and the respondent
- interviewing any witnesses to the conduct
- gathering and reviewing relevant documents, telephone, voice, data, text messages and any other record including written statements, notes, emails, pictures, and other electronic records
- making findings of fact and conclusions
- communicating the findings and conclusions to the parties involved, as appropriate
- determining the appropriate follow up action

All employees, including the complainant and respondent, are expected to fully cooperate with the investigation process. This may include providing information in an interview, submitting a written statement, and/or disclosing emails or documents.

The process for investigating, and resolving incidents, and complaints may range from a single conversation to a process involving extensive submissions, fact-finding and the use of outside investigators or outside counsel. The Company will make the decision as to the appropriate resources to allocate to each incident or complaint and as to the process for the investigation.

9.6 Results of the Investigation

Where discrimination, bullying or harassment (including sexual harassment), or workplace violence has been found, the Company will take corrective action and determine the appropriate response, including whether discipline and/or remedial steps should be implemented. Corrective action may include:

- making a note of the incident on the employee's personnel file
- a verbal discussion with or letter to the employee setting out the Company's expectations going forward
- requiring the employee to attend training or counselling or to issue an apology
- transfer or demotion of the employee
- termination of the employee

9.7 Record Keeping

The Company will keep records of the investigation for at least three years. Records include:

- a copy of the complaint or details about the incident;
- a record of the investigation including notes;
- a copy of the investigation report (if any);
- a summary of the results of the investigation that was provided to the worker who allegedly experienced the workplace harassment and the alleged harasser, if a worker of the employer;
- a copy of any corrective action taken to address the complaint or incident of workplace harassment.

Records of the investigation will be kept confidential and will only be used or disclosed to investigate an incident or complaint of workplace harassment, take corrective action, or otherwise as required or authorized by law.

10.0 TRAINING

The Company will provide periodic training sessions, including during New Hire Onboarding, to employees regarding:

- a) recognizing discrimination, bullying or harassment (including sexual harassment), and workplace violence;
- b) understanding procedures, practices and other arrangements or controls to minimize or eliminate discrimination, bullying or harassment (including sexual harassment), and workplace violence; and
- c) responding to and reporting incidents of discrimination, bullying or harassment (including sexual harassment), and workplace violence appropriately.

11.0 OTHER RESOURCES

If an Employee needs further assistance, they may contact the Human Resources Department, or Health and Safety Representative, or Employee Assistance Program.

12.0 GENERAL

This Policy will be reviewed on an annual basis and may be changed or amended by the Company from time to time without notice.

Nothing in this Policy replaces any other legal rights an employee may have.

APPENDIX A
RESPECTFUL WORKPLACE COMPLAINT FORM

THIS FORM IS TO BE USED TO REPORT A COMPLAINT UNDER THE RESPECTFUL WORKPLACE POLICY.

When should this form be used: This form should be used to report a complaint under Seabridge's Respectful Workplace Policy. The form should be completed as soon as possible after an incident of discrimination, bullying or harassment (including sexual harassment), or workplace violence has occurred.

Who should complete this form: Any employee who believes they are being subjected to or who witnesses discrimination, bullying or harassment (including sexual harassment), or workplace violence should complete this form.

Where does the form go: The form should be provided to a supervisor. If it is not appropriate to report to a supervisor (e.g., the supervisor is involved with or would reasonably be believed to have a bias in the complaint), the employee may submit the form to their department head; the Human Resources department; Senior management; or the Legal Department.

To whom will the form be disclosed: The form will be treated in accordance with Seabridge's Privacy Policy and Respectful Workplace Policy. Seabridge will not disclose information on this form to any person except where disclosure is necessary for the purposes of investigating the complaint or taking responsive measures in relation thereto or as otherwise permitted by the Respectful Workplace Policy. Note that in almost all complaints, Seabridge will have to disclose to the party being accused of a breach of the Policy and potential witnesses enough information about the complaint to allow them to give meaningful evidence. This may involve or result in the disclosure of information in this form.

Information about the parties

Name of employee who is completing this form:
Name of the person(s) who is being harassed, bullied or discriminated against, or subjected to violence:
Name of the person(s) who is doing the harassing, bullying or discriminating, or acts of violence:

Information about the incident: (Please describe each incident in a separate row)

Date of incident	Time of Incident	Location of incident	Names of all persons involved, including witnesses to the incident.	Description of incident (please use as much detail as possible).

You may use additional pages.

I, _____ [print name], confirm that the above information is true to the best of my knowledge and belief and confirm that I understand that making a false, vexatious or unsubstantiated allegation about discrimination, bullying or harassment (including sexual harassment), or workplace violence is a breach of the Respectful Workplace Policy and grounds for discipline, up to and including termination:

_____ Date: _____

Signature