

SEABRIDGE GOLD

SHAREHOLDER ENGAGEMENT POLICY

The Board of Directors (“Board”) of Seabridge Gold Inc. (the “Company”) confirms that constructive engagement with our shareholders is important to ensuring good corporate governance and transparency. To provide for such engagement, this policy outlines how management interacts with shareholders and how the Board and shareholders may communicate with each other. The Corporate Governance and Nominating Committee (the “CGNC”) oversees this policy as it relates to Board engagement and communications with shareholders.

MANAGEMENT ENGAGEMENT WITH SHAREHOLDERS

Management communicates with shareholders primarily through its annual and quarterly reports, management proxy circular, annual information form, technical reports, sustainability reports, news releases, its website, and through presentations at industry and investor conferences. These materials are available on the Company’s website.

At annual shareholder meetings, management reports to shareholders about recent business developments and answers shareholder questions. The external auditor also attends and can answer questions about the audit and preparation and content of the auditor’s report. Shareholders are encouraged to ask questions directed to management or specific executives at the meeting or by emailing questions to the Company and management will endeavor to respond by email as promptly as possible.

The Chairman and CEO is the primary spokespeople to the shareholders and investment community and meets frequently with investor representatives to discuss the Company’s performance.

Shareholders can contact management by mail or email at:

Bruce Scott
Senior Vice President, General Counsel and Corporate Secretary
bruce@seabridgegold.com
106 Front Street East, Suite 400, Toronto, ON, Canada, M5A 1E1

BOARD COMMUNICATION WITH SHAREHOLDERS

The Board maintains that regular and constructive communications are important to creating an open, candid and productive dialogue. The Board annually communicates information about the Board and individual directors, the Company’s corporate governance, technical information, sustainability programs and compensation practices through the management proxy circular.

The Board encourages shareholder attendance and participation at our annual shareholder meetings as well as through informal meetings throughout the year as required. The responsibilities of the Chairman of the Board include ensuring

effective communication with all shareholders. As appropriate, the Chairman may communicate or meet directly with shareholders and may involve other directors of the Board in such engagement activities, including members of Board committees having responsibility for specific issues that are raised by shareholders and report back to the Board on their discussions with shareholders.

SHAREHOLDER COMMUNICATION WITH THE BOARD

In between annual meetings, the Company supports an open and transparent process for shareholders to contact the Board, including the chairs of Board committees.

The Corporate Secretary has been designated as the agent to receive and review communications and meeting requests addressed to the Board. The Corporate Secretary will determine whether the communication received is a proper communication to the Board or should be addressed by management. Questions or concerns regarding the Company's general business operations, financial results, strategic direction and similar matters are most appropriately addressed by management. If management receives any questions that the Board should be made aware of, they will be passed on to the Corporate Secretary to consider. The topics appropriate for the Board to address are:

- Corporate governance practices and disclosure;
- Board performance;
- Executive performance;
- Executive compensation;
- Board and Committee composition and qualifications; and
- Board oversight, including oversight of risk

Shareholders or other stakeholders of the Company may communicate with the Board by mail (marking the envelope "Confidential"), or email as follows:

Bruce Scott

Senior Vice President, General Counsel and Corporate Secretary

bruce@seabridgegold.com

106 Front Street East, Suite 400, Toronto, ON, Canada, M5A 1E1

The Board will endeavour to respond to all appropriate correspondence in a timely manner. On a quarterly basis, the Corporate Secretary shall report to the CGNC on all communications sent to the Board and review and consider responses in relation to corporate governance matters.

In the event that a shareholder requests to speak with an independent director or other representative with respect to any of the matters listed above, the Chairman, or the chair of the relevant Board committee, may be asked to represent the Company in responding to the inquiry in accordance with the Company's

procedures. Any requested communication or meeting will be limited to the predetermined topics identified in the communication or meeting's agenda.

RESTRICTIONS ON DISCLOSURE BY THE COMPANY, MANAGEMENT AND DIRECTORS

Directors, officers and employees of the are prohibited by applicable securities laws and the Company's policies from disclosing or discussing non-public, potentially material information about the Company during the course of any engagement with shareholders. Further, disclosure of certain information about the Company is subject to the Company's policies and practices with respect to the treatment of confidential information. These constraints may impact the timing and substance of communications or meetings with shareholders.

POLICY REVIEW

The CGNC will periodically review this policy and recommend any changes to the Board for approval.