

# SEABRIDGE GOLD

April 16, 2020

Ms. Tyree Mullaney  
Regulatory Specialist  
Mackenzie Valley Land and Water Board  
4922 - 48th Street  
7th Floor YK Centre Mall  
Yellowknife, NT. X1A 2P6

Dear Ms. Mullaney:

**Re: Updated Engagement Plan – MV2019C0025, MV2019L2-0011 & MV2019L2-0012**

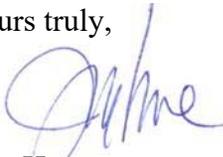
Seabridge Gold is pleased to provide an updated version (ver. 2.1) of our Engagement Plan for posting to the public registry. This version reflects the following administrative changes:

- Annual review and update of stakeholder contact information in Appendix C: List of Affected Parties and their Designated Contacts,
- Update the Seabridge contact list in section 4,
- Update the Revision Table on page i,
- Update the issue date on the cover page, and
- Change the date and version number across the bottom of all pages.

There were no other changes to the Plan. The previous Engagement Plan (ver. 2.0) was submitted in September 2019 and approved by the Board on March 27, 2020 in conjunction with the issuance of the above noted permit and licenses.

Should you have any questions, please do not hesitate to contact me.

Yours truly,



Jane Howe  
Permitting Manager – NWT  
Seabridge Gold  
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# Courageous Lake Project

## Engagement Plan

April 2020

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**SEABRIDGE GOLD**

## REVISION TABLE

Version	Date of Revision	Summary of Changes	Date Approved by MVLWB
1	Jun. 26, 2013	Draft Engagement Plan submitted to Mackenzie Valley Land and Water Board (MVLWB) for review and approval	
1.2	Oct. 13, 2013	Revised Engagement Plan submitted to the MVLWB for review and approval; Revisions reflected stakeholder review comments on version 1	
1.3	Nov. 15, 2013	Minor administrative revisions based on reviewer comments	Jan. 30, 2014
2	Sept. 2019	Submitted as supporting document for Land Use Permit and Water Licence applications. Revised to align with updated MVLWB guidelines; Revised in consideration of input received from Indigenous groups/affected parties	March 27, 2020
2.1	April 2020	Administrative update to Appendix C: Stakeholder Contact list.	

## CONTENTS

<b>REVISION TABLE</b> .....	<b>I</b>
<b>ACRONYMS AND ABBREVIATIONS</b> .....	<b>IV</b>
<b>1. INTRODUCTION</b> .....	<b>1</b>
1.1 Purpose of Plan .....	1
1.2 Goals of Engagement .....	5
1.3 Regulatory Context .....	5
1.3.1 External Policy Context .....	5
1.3.2 Seabridge Policies and Management Plans .....	6
1.4 Revisions and Distribution of Plan .....	7
1.5 Distribution of the Plan .....	7
<b>2. AFFECTED PARTIES</b> .....	<b>8</b>
2.1 Introduction .....	8
2.2 Identification of Affected Parties .....	8
2.2.1 Affected Parties – Indigenous Groups .....	8
2.2.2 Nearest Communities .....	12
2.2.3 Other Land Users .....	12
<b>3. ENGAGEMENT PROGRAM</b> .....	<b>16</b>
3.1 Engagement Planning .....	16
3.2 Engagement Triggers .....	17
3.3 Engagement Methods and Implementation of the Plan .....	17
3.3.1 Implementation of the Plan .....	18
3.4 Documentation and Reporting .....	18
3.4.1 Documentation .....	18
3.4.2 Reporting .....	18
3.4.2.1 Internal Reporting .....	18
3.4.2.2 External Reporting .....	22
3.5 Plan Review .....	22
3.5.1 Reviewing and Updating the Engagement Plan .....	22
3.5.2 Special Circumstances .....	22
<b>4. SEABRIDGE INTERNAL ROLES AND CONTACT INFORMATION</b> .....	<b>24</b>
<b>5. REFERENCES</b> .....	<b>25</b>

**APPENDIX A SEABRIDGE ENVIRONMENTAL POLICY**

**APPENDIX B SUMMARY OF INPUT FROM AFFECTED PARTIES ON REVISIONS TO THE  
ENGAGEMENT PLAN**

**APPENDIX C LIST OF AFFECTED PARTIES AND THEIR DESIGNATED CONTACTS**

### List of Tables

Table 1: Summary of Engagement Methods .....	19
Table 2: Implementation of Engagement Activities.....	21
Table 3: Engagement Plan Performance Indicators .....	23

### List of Figures

Figure 1: Regional Map of the Courageous Lake Property .....	2
Figure 2: Courageous Lake Property – Proposed Exploration Land Use and Water Use .....	3
Figure 3: Indigenous Group Territories and Agreements in relation to the Courageous Lake Property .....	9
Figure 4: Other Land Users in relation to the Courageous Lake Property .....	13
Figure 5: Stages of the Engagement Program .....	16

## ACRONYMS AND ABBREVIATIONS

ADFN	Akaiicho Dene First Nation
AIMAIO	Akaiicho Interim Measures Agreement Implementation Office
CIRNAC-CARD	Crown-Indigenous Relations and Northern Affairs Canada –Contaminants and Remediation Division
EP	Engagement Plan
GNWT	Government of the Northwest Territories
ha	hectares
IBA	Impact and Benefit Agreement
km	kilometre
LKDFN	Łutsel K'e Dene First Nation
MVLWB	Mackenzie Valley Land and Water Board
NSMA	North Slave Métis Alliance
NWT	Northwest Territories
NWTMN	Northwest Territory Métis Nation
NWTMN AiP	Northwest Territory Métis Nation Agreement-in-Principle
TG	Tłıchq Government
TK	Traditional Knowledge
YKDFN	Yellowknives Dene First Nation
WLWB	Wek'èezhii Land and Water Board
WRRB	Wek'èezhii Renewable Resource Board

## 1. INTRODUCTION

Seabridge Gold NWT Inc. (Seabridge) is a Canadian based resource exploration company that has been conducting gold exploration in the Courageous Lake area since 2003. The Courageous Lake area is approximately 240 kilometres (km) northeast of Yellowknife, Northwest Territories (NWT; Figure 1). The property comprises 62 mineral leases and 26 mineral claims, totaling 50,258 hectares (ha) which are wholly owned by Seabridge. The property is located within an historic mining district that includes two past producing mines, underground exploration workings, and undeveloped mineral resources.

Exploration activities since 2012 have been regulated by a Class A Land Use Permit (MV2012C0025) issued by the Mackenzie Valley Land and Water Board (MVLWB). This permit expires December 27, 2019. For the next five to seven years, Seabridge proposes to conduct exploration activities that are focused on growing the mineral resources, maintaining community relationships and expanding the geological, ecological and traditional knowledge (TK) of the area.

To authorize these exploration activities Seabridge is submitting one Type A land use application and two Type B water licence applications to the MVLWB. The land use permit application describes the same activities within the same permit boundary as the expiring permit. Seabridge is submitting two Type B water licence applications to provide greater logistical flexibility and allow Seabridge to operate up to five drills simultaneously. While the proposed exploration activities remain the same as those previously authorized, the use of three or more drills at one time may result in daily water usage that exceeds the 100 m<sup>3</sup>/day allowed by regulations without a water licence. At Courageous Lake, two Type B water licences are required because the proposed activities will occur on both Territorial lands and Federal lands. With the exception of the winter road spur, all activities will occur within the land use permit area identified on Figure 2.

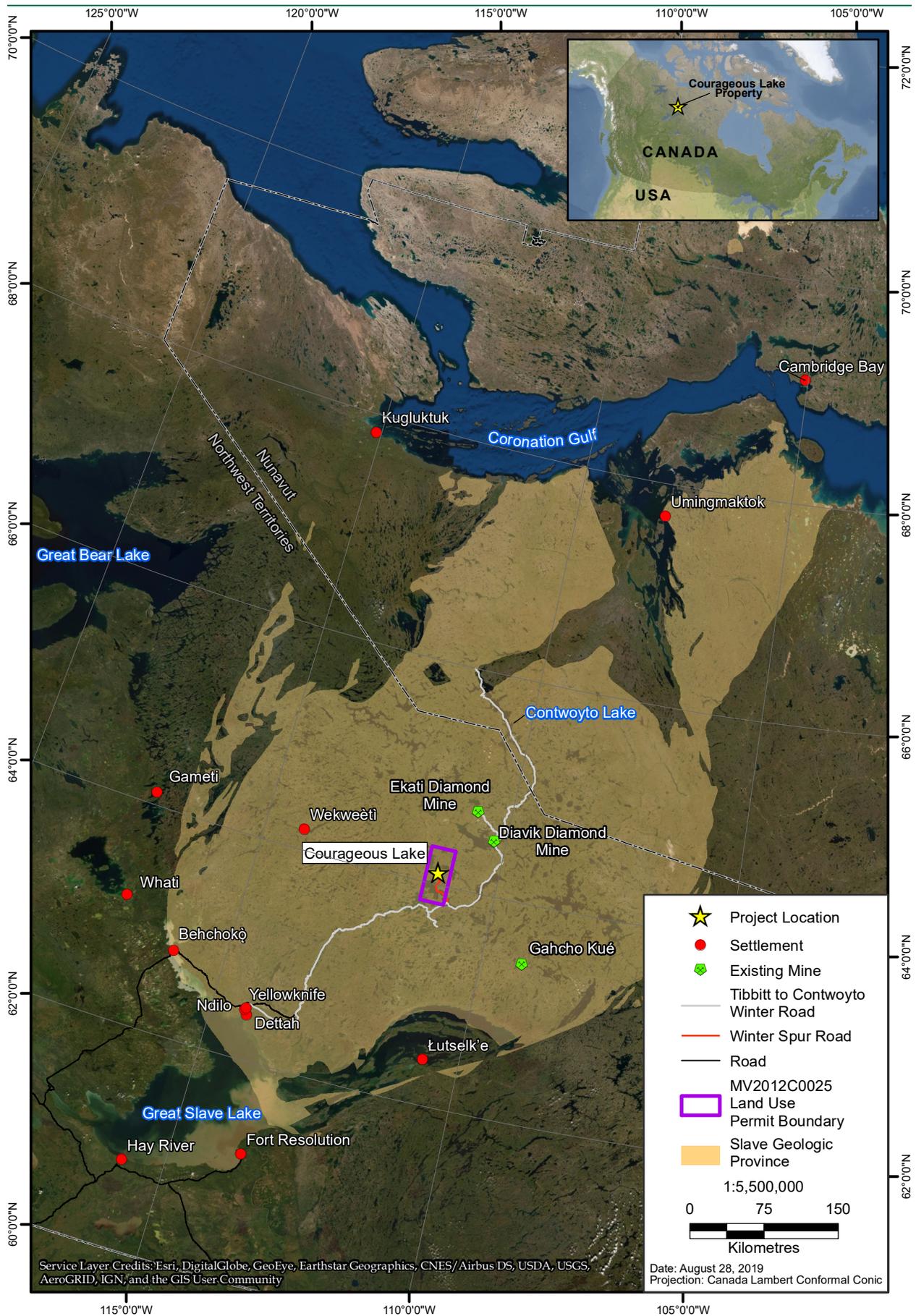
Seabridge acknowledges that the Courageous Lake property and proposed exploration activities are located on the traditional lands of Indigenous Peoples and recognizes the importance of engaging with affected parties throughout the various phases of activities. The project is sited on lands within the Treaty 11 Claim, the Akaitcho Traditional Territory, the Wek'èezhii Resource Management Area and the Monfwi Gogha Dè Njìt'èè Area of the Tłı̨chǫ Land Claim Agreement, as well as the North Slave Métis Alliance (NSMA) traditional lands. The property is located hydrologically upstream of the Northwest Territory Métis Nation (NWTMN) asserted lands.

Seabridge actively engages with the Tłı̨chǫ Government (TG), the Yellowknives Dene First Nation (YKDFN), Łutsel K'e Dene First Nation (LKDFN), NSMA, and NWTMN regarding activities at Courageous Lake. Seabridge has and continues to conduct engagement initiatives with the intention of building and maintaining constructive relationships with affected parties. Impacts to traditional land users of the Courageous Lake area have been, and are expected to continue to be, minimal during the exploration stage.

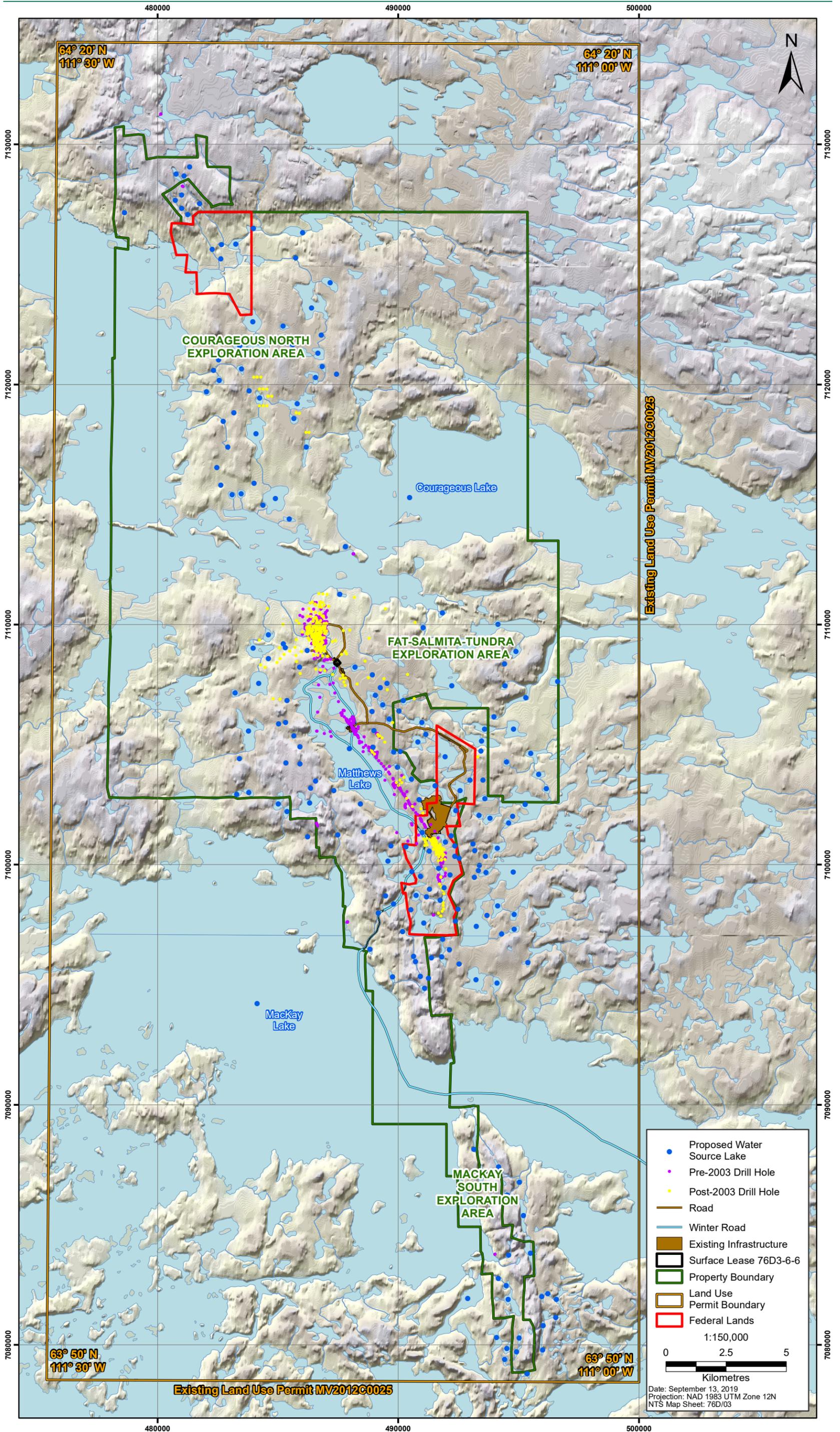
### 1.1 Purpose of Plan

The Courageous Lake Engagement Plan (Plan or EP) is a key supporting document and part of Seabridge's applications for a land use permit and two water licences. It will ensure that a consistent, comprehensive, coordinated and culturally appropriate approach is used to undertake engagement with affected parties. The Engagement Plan is designed to support Seabridge in establishing and maintaining constructive relationships with affected parties during the proposed exploration activities.

Seabridge follows the definition of engagement as articulated in the Board's Engagement and Consultation Policy (Policy), which defines engagement as "*the communication and outreach activities a proponent undertakes with affected parties prior to and during the operation of the project*" (MVLWB 2013).



**Figure 1: Regional Map of the Courageous Lake Property**



**Figure 2: Courageous Lake Property - Proposed Exploration Land Use and Water Use**

## 1.2 Goals of Engagement

Engagement provides a means for Seabridge to share ideas, plans, and values while receiving input from affected parties regarding potential and existing concerns about the project. Through engagement, Seabridge and affected parties are able to discuss measures to mitigate or otherwise address concerns in advance areas of potential conflict. Engagement keeps affected parties informed and up to date on what is happening with the proposed exploration activities. The goals of engagement are to:

- build cooperative working relationships with affected parties, and garner long term support for the project;
- understand views, concerns, interests and expectations of affected parties, and to be able to respond to those interests and expectations in a timely manner;
- understand potential impacts of the proposed exploration activities on affected parties, and prepare and implement mitigation measures to avoid, reduce or manage effects;
- understand TK, land use, and the cultural and historical contexts of the affected parties;
- help understand the needs and priorities of affected parties so that decisions can be made with these needs and priorities in mind; and
- meet the requirements of the MVLWB and Indigenous governments involved in reviewing the proposed exploration activities.

Seabridge recognizes that the benefits of engagement are long-term. Ongoing engagement is an investment in achieving Seabridge's vision of being a responsible and welcome member of the communities in which we operate.

## 1.3 Regulatory Context

Seabridge was issued land use permit MV2012C0025 for a five year term commencing December 28, 2012 and expiring December 27, 2017. The permit was subsequently extended for an additional two years to December 27, 2019. As a condition of the permit, Seabridge prepared an Engagement Plan which was approved by the MVLWB on January 14, 2014 following review and comments by affected parties.

The MVLWB released two documents to support engagement and consultation processes: *Mackenzie Valley Land and Water Board Engagement and Consultation Policy* ("Policy") and the *Mackenzie Valley Land and Water Board Engagement Guidelines for Applicants and Holders of Water Licenses and Land Use Permits* ("Guidelines"). Both documents were released June 1, 2013; the Guidelines were updated in September 2014.

More recently the MVLWB issued *Standard Land Use Permit Template* ("Standard Conditions") which is updated from time to time. The standard conditions related to Engagement Plans require a proponent to submit an engagement plan in accordance with the Guidelines, adhere to the plan once approved by the MVLWB, and annually review the plan and make necessary revisions, which are to be submitted to the MVLWB for approval.

### 1.3.1 External Policy Context

In addition to the MVLWB Guidelines, Seabridge has considered the following agreements and guidelines in the development of this EP. These agreements define consultation requirements between the federal and territorial governments and Indigenous groups, including the activities of various management boards such as the MVLWB and the Wek'èezhii Renewable Resource Board (WRRB), which in turn influence the engagement activities required by Seabridge:

- *Tłı̄chǫ Land Claims and Self-Government Agreement (between Dogrib Treaty 11 Council, Government of the Northwest Territories [GNWT] and the Government of Canada; 2003, implemented in 2005);*
- *Akaītcho Dene First Nation Interim Measures Agreement<sup>1</sup> (between Akaītcho Territory Dene First Nations, GNWT and the Government of Canada; 2001), including:*
  - *Guidelines for Mineral Exploration Companies in the Akaītcho Territory (2010) which outlines a stepwise approach for engaging with Akaītcho Dene First Nations (ADFN) prior to conducting exploration activities.*
- *Northwest Territory Métis Nation Interim Measures Agreement (between Northwest Territory Métis Nation First Nations, GNWT and the Government of Canada; 2002);*
- *Tłı̄chǫ First Nation and Akaītcho Territory Dene First Nations Agreement on Overlapping Interests, Lands and Resources (2002);*
- *Northwest Territory Métis Nation Policies, including:*
  - *NWTMN Consultation Guide: The NWTMN Consultation Guide refines/reinforces the definition of consultation described in the Mackenzie Valley Resource Management Act (MVRMA) and emphasizes that any government engagement to address a potential adverse impact with an aboriginal group must include the provisions outlined in section 35 of the Constitution.*
  - *NWTMN Engagement Policy: This policy indicates that all requests for engagement with the NWTMN must be directed to the NWTMN Lands and Resources Office.*
  - *Traditional Knowledge (TK) Policy: The TK Policy describes the responsibility for NWTMN to collect, document and present Métis cultural, history and traditional knowledge.*

### 1.3.2 *Seabridge Policies and Management Plans*

#### **Policies**

Seabridge believes that being a responsible and welcomed member of the communities in which it operates is an essential part of doing business. Seabridge has adopted and implemented corporate policies and practices which codify the company's understanding of responsible corporate decision-making and behaviour. These policies are summarized below and can be found on the Seabridge corporate website (<http://seabridgegold.net/pdf/gov/ManCorpPolPrac.pdf>).

- *Code of Business Ethics: The Code of Business Ethics describes the business conduct expectations for all Seabridge employees. It outlines the necessity for compliance with the law, avoidance of conflict of interest, fiscal integrity and responsibilities, commitment to providing a safe and healthy working environment, fairness and respect in the workplace and treatment of confidential information.*
- *Communications and Disclosure Policy: The Communications and Disclosure Policy outlines the approach control communications with external stakeholders, including affected parties.*
- *Environmental Policy: The Environmental Policy (Appendix A) outlines Seabridge's approach to meet or surpass existing regulatory standards and minimize undesired impacts on the environment, to the extent possible.*
- *Health and Safety Policy: The Health and Safety Policy describes Seabridge's commitment to achieving health and safety standards in all aspects of the business. Health and safety commitments include the involvement of employees and contractors in training programs, safe work procedures, and operational standards.*

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<sup>1</sup> An Interim Measures Agreement is an agreement that clarifies how the Government of Canada and the GNWT will work with an Indigenous group during land and resource negotiations.

## Management Plans

Seabridge maintains management plans that are required under the conditions of its land use permit and (proposed) water licences. These plans describe the actions and responsibilities for managing potential environmental impacts associated with exploration activities at Courageous Lake. Management plans include:

- *Wildlife Management and Monitoring Plan*: Identifies wildlife species in the project area and defines how Seabridge and its contractors will minimize potential effects of exploration activities on wildlife and wildlife habitat.
- *Spill Contingency Plan*: Identifies hazardous and other materials that are used/stored at the project, their quantities, storage locations and Safety Data Sheets. Defines the responsibilities of personnel and outlines procedures to effectively and efficiently contain and recover spills on land, water and ice, including reporting requirements.
- *Waste Management Plan*: Describes the collection, segregation, handling, treatment, storage, transport, and disposal of hazardous and non-hazardous waste.
- *Closure and Reclamation Plan*: Defines the closure goal of returning areas affected by current exploration activities to viable and, wherever practicable, self-sustaining ecosystems that are compatible with a healthy environment. Outlines a program of activities that will facilitate Seabridge attaining their closure goal and includes cost estimates for two exploration scenarios for use by MVLWB to determine security deposit requirements under the land use permit and water licences.

### 1.4 Revisions and Distribution of Plan

This updated version of the EP outlines how Seabridge will continue to engage affected parties to meet the MVLWB Guidelines and other guidance outlined above. This plan will become effective once approved by MVLWB.

Seabridge sought input from affected parties regarding revisions to this Engagement Plan. Meetings were held with affected parties and Version 1.3 of the Engagement Plan was circulated in January 2019 and again in May/June for comments and suggestions. Input pertained to updated contact information, engagement methods and frequency, scope of engagement with community representatives and members, topics of interest during consultation (e.g., potential impacts and mitigation measures). Details of input received from affected parties is summarized in Appendix B.

The MVLWB confirmed with Seabridge that Federal and Territory governments were not considered affected parties and therefore input on engagement approach was not sought from these groups (e.g., Government of Northwest Territories [GNWT], Crown-Indigenous Relations and Northern Affairs Canada [CIRNAC], Fisheries and Oceans Canada [DFO], and Environment and Climate Change Canada [ECCC]).

Seabridge will continue to seek feedback from affected parties to assess the effectiveness of its engagement efforts with affected parties. The Plan will be reviewed annually and any updates or changes will be resubmitted to the MVLWB for approval. The Plan Revision Table on Page i of this document provides a record of revisions to date.

### 1.5 Distribution of the Plan

Distribution of the plan includes:

- Seabridge Vice President Environmental Affairs;
- Seabridge Courageous Lake Project Manager;
- Seabridge Head Office – Toronto; and
- MVLWB Public Registry – online.

## 2. AFFECTED PARTIES

### 2.1 Introduction

This section describes the methodology used for identifying affected parties, and then describes the affected parties considered for the project, and the rationale for their inclusion.

Seabridge has incorporated the MVLWB's definition of an affected party, defined in the 2013 Policy and Guidelines as: *"a party that is predicted to be affected by a proposed project, such as an Aboriginal organization/government, an individual occupying land for traditional purposes, a private landowner, or lease holder (e.g., for a lodge)."*

### 2.2 Identification of Affected Parties

Seabridge proposes to continue conducting permitted exploration activities on Crown land which is recognized as traditional lands of a number of Indigenous groups. This section identifies Indigenous groups and land users that may be affected by the exploration activities. The affected parties are described below and Appendix C provides contact information for each group, where available. Seabridge maintains a database to track engagement activities with affected parties.

In accordance with the MVLWB Guidelines, Seabridge previously conducted a search to identify potentially affected groups. For this updated Engagement Plan, Seabridge consulted MVLWB staff and CIRNAC and reviewed land use maps, such as "NWT land information related to Aboriginal groups" map (CIRNAC<sup>2</sup> 2012) to identify land claims, agreements, asserted claims, traditional territories and settled claims in areas surrounding the property were still valid. Seabridge's process for re-affirming affected parties also involved discussion with community and Indigenous leaders to understand potential impacts of the activities. Aside from the Indigenous groups, a mapping process was used to identify other land users (e.g., mineral claims, surface lease holders).

#### 2.2.1 Affected Parties – Indigenous Groups

##### **Akaiitcho Territory Government and the Akaiitcho Interim Measures Agreement Implementation Office**

The Akaiitcho Territory Government represents the environmental, social, political, cultural, and economic interests of Akaiitcho Dene First Nations (ADFN), which include the member nations of the Yellowknives Dene First Nation (YKDFN), Łutsel K'e Dene First Nation (LKDFN), Deninu Ku'e First Nation, and Smith's Landing First Nation<sup>3</sup>. The asserted Akaiitcho territory stretches from the eastern portion of Great Slave Lake in the east, north of Contwoyto Lake in the north, to the Nunavut border in the east, and south into Saskatchewan and Alberta (Figure 3).

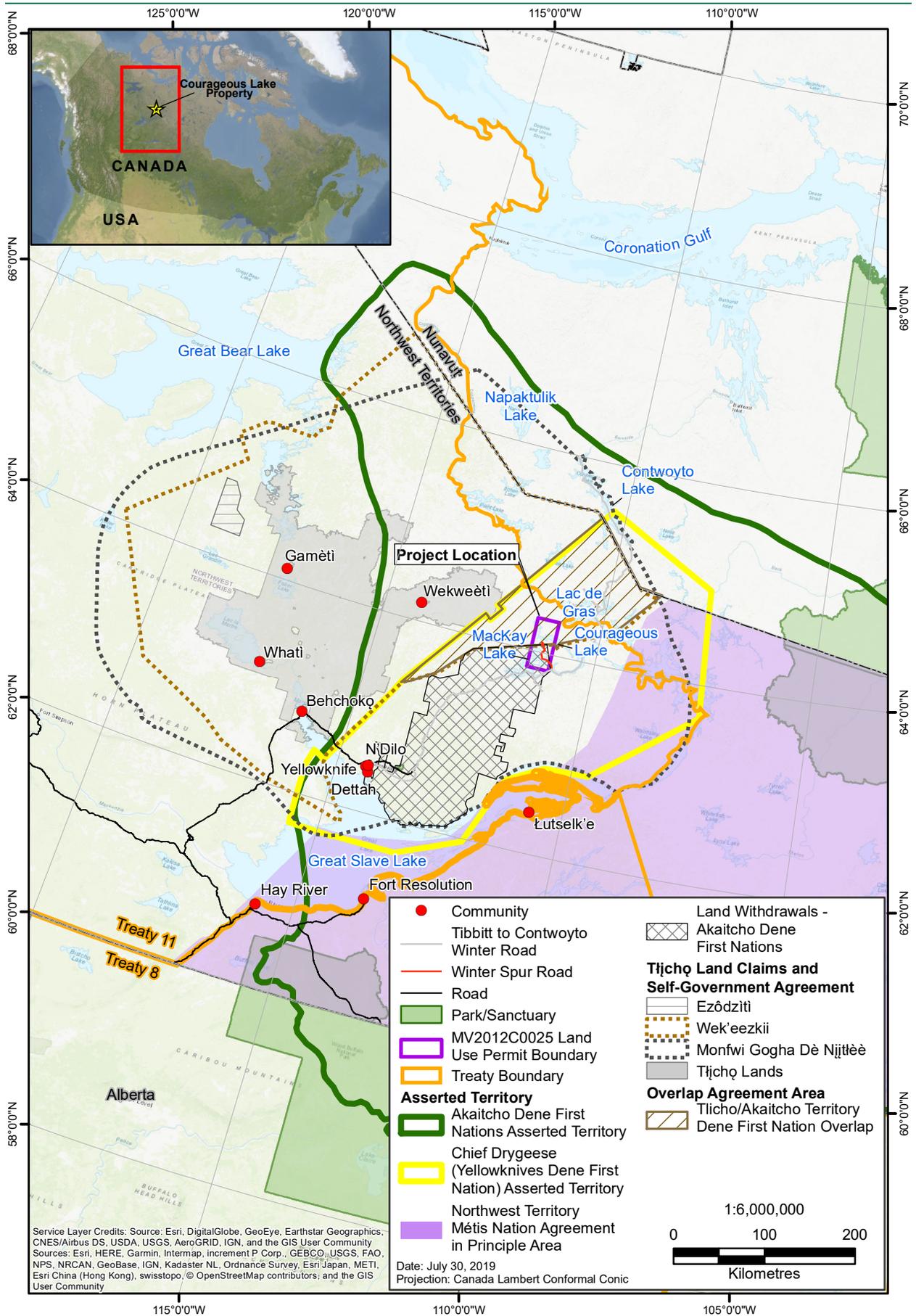
In 2000, the Akaiitcho developed a Framework Agreement with the Government of Canada and the GWNT to guide negotiations toward a final treaty agreement (the Akaiitcho Process)<sup>4</sup>. This process resulted in a 2001 *Interim Measures Agreement* for screening development applications in Akaiitcho asserted territory, a 2006 Interim Land Withdrawal of 1,034 ha from the City of Yellowknife, and a 2007 Land Withdrawal Agreement to protect 62,000 km of federal Crown land within Akaiitcho territory while negotiations continue. An agreement in principle and final agreement are yet to be completed (Akaiitcho Dene First Nations n.d.).

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<sup>2</sup> Formerly referred to as Aboriginal and Northern Development Canada (AANDC) and is now called Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC).

<sup>3</sup> The Deninu K'ue and Smith's Landing First Nation are not considered an affected party due to their distance from the Project.

<sup>4</sup> The Akaiitcho Dene First Nation were signatories of Treaty 8 in 1900. Differences in the interpretation of the treaty in the 1970s, resulted in the development of the Akaiitcho Process.



**Figure 3: Indigenous Group Territories and Agreements in Relation to the Courageous Lake Property**

The Akaitcho Interim Measures Agreement Implementation Office (AIMAIO) is responsible for supporting the review and screening of development applications for land use permits and water licences within the Akaitcho asserted territory.

Seabridge has and continues to engage with the AIMAIO regarding the project due to the AIMAIO's role in application review. The 2007 Akaitcho land withdrawal includes areas adjacent to the Courageous Lake property (Figure 3). In 2018, the AIMAIO indicated that Seabridge should directly engage with the YKDFN and LKDFN; as needed, Seabridge may include AIMAIO in its correspondence with YKDFN and LKDFN to keep AIMAIO abreast of project activities. As described below, Seabridge has actively engaged with the YKDFN and LKDFN independently regarding their interests related to the Courageous Lake property.

### Yellowknives Dene First Nation

The Yellowknives Dene First Nation (YKDFN) is a member of the Akaitcho Dene First Nations. Members of the YKDFN are based primarily in the communities of Dettah and Ndilo. There are 1,588 registered members of the YKDFN (CIRNAC 2019a) and the community uses a custom electoral system, with elections held every four years.

Within the Akaitcho Territory, the YKDFN have an asserted territory called the Chief Drygeese Territory or Yellowknives Dene First Nation Asserted Territory (Figure 3). The Courageous Lake property lies within both the Akaitcho and Yellowknives Dene First Nations Asserted Territory, approximately 240 km northeast of the two YKDFN communities, and as such the YKDFN are considered an affected party.

### Łutsel K'e Dene First Nation

The Łutsel K'e Dene First Nation (LKDFN) is a member of the Akaitcho Dene First Nations. Łutsel K'e is the primary community of the LKDFN. There are 800 registered members of the LKDFN (CIRNAC 2019b) and the community uses a custom electoral system, with elections held every three years. The Courageous Lake property is located approximately 200 km north of the community, within the Akaitcho Territory, and as such, LKDFN are considered an affected party. Figure 3 illustrates the asserted territory of the Akaitcho Dene First Nation, which includes the LKDFN.

### Tłı̨chq̓ Government

The Tłı̨chq̓ Government (TG) represents the Tłı̨chq̓ Nation citizens (previously Dogrib) residing in the communities of Behchokq̓, Gamèti, Wekweèti, and Whati (Figure 3). According to statistics of the GNWT, in July 2018, there are 2,944 residents living in the four main TG communities (Northwest Territories Government Bureau of Statistics 2018).

The TG was established when the *Tłı̨chq̓ Land Claims and Self-Government Agreement* (the Agreement) came into effect in 2005. The Agreement was signed by the Dogrib Treaty 11 Council, GNWT and the Government of Canada. The Agreement provides the TG with rights and benefits to land, resources, and self-government (Tłı̨chq̓ Government n.d.a)<sup>5</sup>. The Agreement allowed for the TG to establish their own Constitution, which sets out the rights and freedoms of Tłı̨chq̓ citizens and establishes the rules and election process for the TG. The focus of the TG is the protection of the Tłı̨chq̓ language and culture, heritage and wildlife.

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<sup>5</sup> Upon the ratification of the Tłı̨chq̓ Agreement (Tłı̨chq̓ Government, GNWT, and Government of Canada) in 2005, the Tłı̨chq̓ community governments of Behchokq̓, Whati, Gamèti, and Wekweèti replaced Indian Act Bands and NWT municipal corporations and the Tłı̨chq̓ Government was formed.

The Kwe Beh Working Group supports the Tłıchq Government by managing the implementation of Impact and Benefit Agreements (IBAs) in the Tłıchq region, and managing the mining and roads files within the region (Tłıchq Government n.d.b). The Kwe Beh Working Group is convened to build relationships with mining companies and to support the TG's involvement in any regulatory process of an environmental assessment. The Kwe Beh Working Group convenes at least every two months, or more as needed.

The Tłıchq Land Claims and Self-Government Agreement allocated 39,000 km<sup>2</sup> of land located between Great Slave Lake and Great Bear Lake as Tłıchq Lands, which are owned by the Tłıchq Government (Tłıchq Agreement n.d.). The Agreement identifies four categories of land (Figure 3):

- **Monfwi Gogha Dè Njittèè:** The largest area, Monfwi Gogha Dè Njittèè, is the territory of the TG. In this area Tłıchq citizens hold nonexclusive rights to harvest trees and plants and all species of wildlife at all times of year without a license from the GNWT.
- **Tłıchq Lands:** Tłıchq lands are within the Monfwi Gogha Dè Njittèè and includes the main TG communities. Within this area the TG owns the surface and mineral (subsurface) resources (fee simple). On Tłıchq Lands, Tłıchq citizens hold certain exclusive rights, such as the right to harvest furbearers and take and use water.
- **Wek'èezhii Resource Management Area:** Wek'èezhii is within Monfwi Gogha Dè Njittèè and contains the Tłıchq Lands. The Wek'èezhii Renewable Resource Board makes recommendations about wildlife management, forest and plant management, and commercial activities within Wek'èezhii.
- **Ezôdziti:** This area is within Monfwi Gogha Dè Njittèè, north of Lac Grandin, and is an area of historical and cultural importance to the Tłıchq people, but is not an area owned by the group, nor do they have special harvesting rights in this area.

The Courageous Lake property is within Monfwi Gogha Dè Njittèè and partially within the Wek'èezhii Resource Management Area. The nearest community of Wekweèti is located approximately 140km west of the property and as such, TG are considered an affected party.

### Northwest Territory Métis Nation

The Northwest Territory Métis Nation (NWTMN) comprise the Indigenous Métis originally from the South Slave region of the NWT (Northwest Territory Métis Nation n.d.). The NWTMN membership is politically represented by the Fort Resolution (Deninu) Métis Council, the Fort Smith (Thebacha) Métis Council, and the Hay River (Xatlo Dehe) Métis Government Council.

The NWTMN and Federal government signed the *Northwest Territory Métis Nation Land and Resources Agreement-in-Principle* (NWTMN AiP) in 2015. The NWTMN AiP outlines land ownership, protection of Métis harvesting practices, duty to consult and development of agreements for oil and gas development and mineral exploration and development, and participation in land, water and renewable resource management (Northwest Territory Métis Nation 2012). A final agreement has not been signed to date.

The NWTMN encompasses the portions of land surrounding Great Slave Lake, extends east to Nunavut and includes the northern parts of the provinces bordering the NWT. The Courageous Lake property is located hydrologically upstream of the NWTMN asserted lands (Figure 3), and as such, NWTMN are considered an affected party.

### North Slave Métis Alliance

The North Slave Métis Alliance (NSMA) is a non-profit organization established to represent the Métis people living in Yellowknife, Behchokq, Whati, Gamèti, Wekweèti, Dettah, and Ndilo. NSMA represents this group in regionally-based negotiations (North Slave Métis Alliance n.d.).

The NSMA exercise and assert their Aboriginal rights in the region north and east of Great Slave Lake. The Courageous Lake project is within this area (Figure 3), and as such, NSMA are considered an affected party.

On January 19, 1998, the NSMA submitted a statement of claim to the federal government for lands in the North Slave region. A June 20, 2013 decision of the Supreme Court of the Northwest Territories confirmed that NSMA members have a claim to Aboriginal rights under section 35(1) in the Constitution and exercise them in the area north and east of Great Slave Lake, and must be consulted when their rights may be affected (Enge v. Mandeville et al. 2013). A 2017 federal decision found that the NWTMN AiP was based on Indian ancestry not Métis ethnicity, and that Canada was blind to that difference when it consulted about the NWTMN AiP. That indifference affected the consultation process (North Slave Métis Alliance n.d.; CBC 2017). The court also questioned the legitimacy of the NWTMN as a representative of the Métis of the Great Slave Lake area. The Government of Canada has been ordered to consult with NSMA about appropriate accommodation measures.

### **2.2.2 Nearest Communities**

There are no permanent communities in the immediate vicinity of the Courageous Lake property (Figure 1); the nearest community to the project is Wekweèti (approximately 140 km to the west). Other Tłıchǝ communities in the area include Whatı (330 km), Gamèti (310 km) and Behchokǝ (290 km). The City of Yellowknife, and the communities of Dettah and Ndilo are located approximately 240 km to the southwest. Łutsel K'e is located approximately 200 km to the south.

These communities are listed as affected parties; however, engagement is undertaken through activities with five Indigenous groups: TG, LKDFN, YKDFN, NWTMN, and NSMA.

### **2.2.3 Other Land Users**

Seabridge recognizes there are other land users in the vicinity of the Courageous Lake property.

#### **Mineral Tenures**

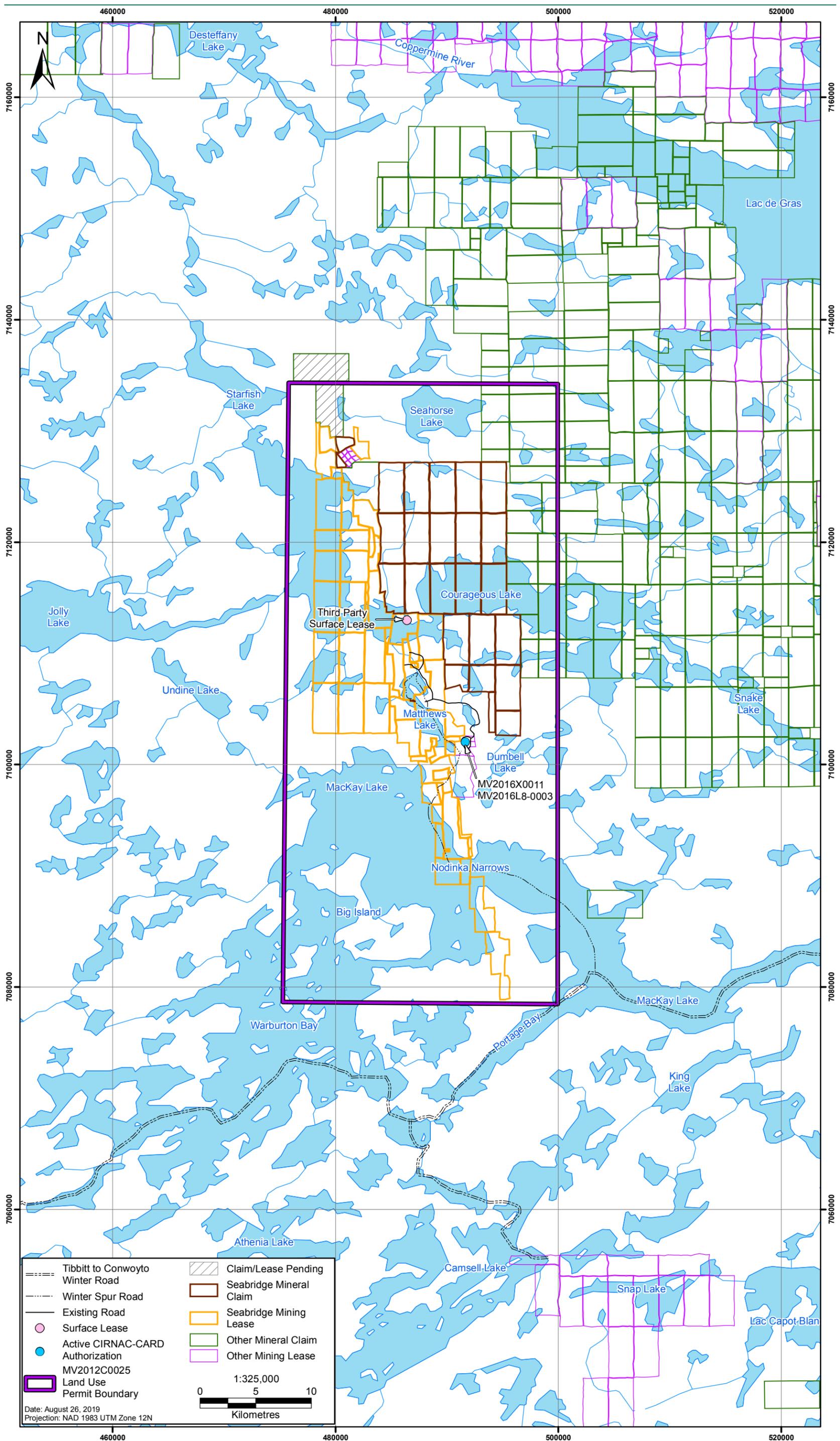
Seabridge engages with mineral tenure holders and mining companies through its involvement in industry events and associations, such as the NWT and Nunavut Chamber of Mines. Figure 4 identifies active mineral tenures in the vicinity of the property. On an as needed basis, Seabridge will engage with active mining and mineral tenure holders regarding the proposed exploration activities.

#### **Surface Lease**

There is one surface lease holder within the immediate Courageous Lake area, associated with a fishing and hunting camp located on the north shore of the east arm of Courageous Lake. The camp has not been active for over ten years and the lease holder has previously approached Seabridge to purchase the lease and associated facilities and equipment.

#### **Other Active Authorizations**

Seabridge queried the MVLWB interactive online map system to identify other active land and water users in the area. The Crown-Indigenous Relations and Northern Affairs Canada – Contaminants and Remediation Division (CIRNAC-CARD) has two active authorizations, land use permit MV2016X0011 and water licence MV2016L8-0003. Both authorizations are for post-closure monitoring activities by CIRNAC-CARD associated with the remediation at the former Tundra Mine. Seabridge engages regularly with CIRNAC-CARD in regard to technical and logistical matters related to activities in the area.



**Figure 4: Other Land Users in relation to the Courageous Lake Property**

### Trapping, Fishing, Gathering, and Other Land Uses

The Tłıchǫ Use and Knowledge of ʔEwaanit'iiti Report (Tsatchia et al. 2012) identifies trapping routes, fishing locations, plant harvesting, and traditional camp locations in the Courageous Lake area.

The YKDFN are currently completing a TK Study to identify their traditional use of the area near Courageous Lake. The draft report (YKDFN, 2019) describes the Courageous Lake area as an important place for traditional and contemporary uses that include: hunting, fishing, gathering, tool making and camping. The YKDFN maintain a camp on the western shore of MacKay Lake, approximately 15 km southwest of Seabridge's Matthews Lake Camp. The nearest exploration activities will consist of winter ice road construction on MacKay Lake approximately 12 km east of the YKDFN camp.

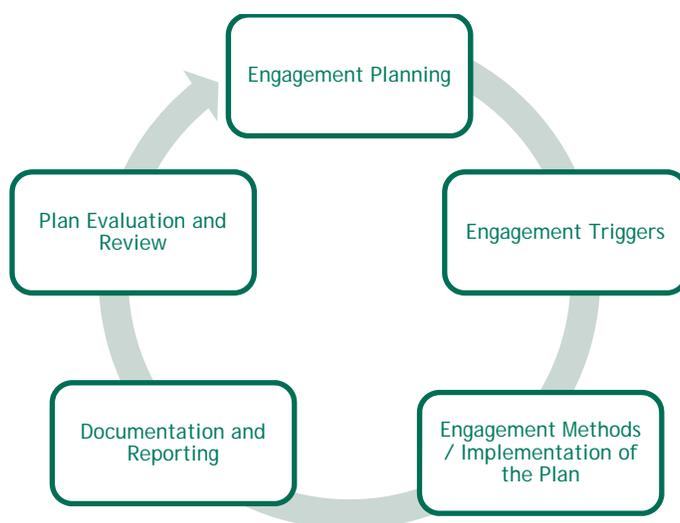
There are currently no known active trappers or registered traplines in vicinity of the Land Use Permit boundary; and Seabridge will engage with affected parties regarding these activities and interests.

Seabridge will continue to engage with the affected Indigenous groups to understand land use activities in relation to the project.

### 3. ENGAGEMENT PROGRAM

Engagement is an iterative and adaptive process. The Engagement Program described below outlines the process for planning, implementation and review of engagement activities. This program will be re-evaluated (as described in Section 3.5) in response to input received from affected parties, as well as in response to the evolving relationships with affected parties. Figure 5 illustrates the stages of the Engagement Program.

**Figure 5: Stages of the Engagement Program**



#### 3.1 Engagement Planning

Engagement planning involves review of the previous engagement plan and input received from affected parties regarding topics of interest and methods of engagement.

This version of the Engagement Plan provides an update to previous versions of the plan, in response to project updates, new guidance and input received from affected parties. Each version of the Plan provides an outline of the anticipated engagement activities.

Communicating the Plan is an important element to the success of the engagement process. Affected parties need to be aware of how Seabridge plans to carry out engagement and who they can contact in the event they wish to seek information or clarification regarding project activities.

As described in Section 1.4, Seabridge sought input from affected parties prior to updating the Plan. Input was sought during face to face meetings in January, February, June, and July 2019, and via email. If no comments were received, attempts to follow-up via email and phone were made. Appendix B summarizes the input received from affected parties regarding the Engagement Plan.

### 3.2 Engagement Triggers

Seabridge has identified activities that trigger engagement to provide certainty around engagement timing while remaining flexible.

The triggers for engagement include<sup>6</sup>:

- project updates;
- annual work plan review and/or modifications;
- new permit application (e.g., Wildlife Research, Archaeology, Land Use Permit, Water Licence);
- amendment to permit;
- revision to management plans (e.g., engagement, wildlife, waste, spills, closure);
- prior to commencement of field work (per season);
- completion of drill programs;
- distribution of report (e.g., monitoring reports or field reports - wildlife, archaeology);
- annual report – corporate;
- press releases – corporate;
- claim staking; and
- employment opportunities (with Seabridge or its Contractors).

### 3.3 Engagement Methods and Implementation of the Plan

The engagement methods follow three guiding principles, consistent with guidance from the MVLWB:

1. The nature and scope of engagement efforts should reflect the magnitude and complexity of the project and the level of activity.
2. Engagement methods and schedules must, by mutual agreement between affected parties and Seabridge, be reasonable and sustainable for both Seabridge and the affected parties.
3. The nature of the engagement methods and the frequency of engagement will change as the relationships between the affected parties and Seabridge develops, and as project activities progress. The Engagement Plan should be reviewed regularly to reflect changes in the regular context, project activities and relationships with affected parties.

The Courageous Lake project is an exploration phase project, there are no advanced exploration or mining activities proposed. Seabridge intends to use standard engagement methods, while recognizing that not all potentially affected parties are the same and that what might work for one particular group may not work for another. Seabridge is open to applying methods that work best for a particular situation and affected party. Keeping that line of communication open will build a rapport and establish a trust amongst the Parties.

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<sup>6</sup> Most triggers are regulatory requirements. Information will also be sent to relevant regulators and may be posted on the MVLWB public registry.

Seabridge has incorporated the four recommended levels of engagement described in the MVLWB guidelines:

1. Written notification to affected parties.
2. Face-to-face meeting with affected parties\*.
3. Community public meetings\*.
4. Workshops with affected parties\*.

The methods marked with an asterisks (\*) are recommended for large projects, those that utilize new technologies, or are in an area of significant interest to an affected party or parties. Although Courageous Lake is not a large project, it has considered these methods as applicable.

Seabridge has and will continue to use the methods of engagement outlined in Table 1. The method and level of engagement is designed to be commensurate with the level of exploration activities. For each method, Seabridge has described the goal, approach and input received to date on the method.

### **3.3.1** *Implementation of the Plan*

Table 2 provides an overview of the anticipated implementation of planned engagement activities. The table combines the triggers for engagement, engagement methods, and frequency of engagement. These activities will be implemented to provide the information to each of the five affected parties: TG, YKDFN, LKDFN, NSMA, and NWTMN.

## **3.4** **Documentation and Reporting**

### **3.4.1** *Documentation*

It is important to document all aspects of engagement to ensure that there is a corporate memory of engagement efforts and feedback received during engagement activities. Documentation of engagement activities and outcomes support Seabridge's:

- understanding of potential issues raised by affected parties, in order that responses can be prepared;
- efforts to achieve meaningful and transparent engagement; and
- review of the effectiveness of engagement activities, which can be referenced during revisions of this Plan (described in Section 3.5).

Seabridge uses an engagement tracking system (StakeTracker) to document its engagement efforts and activities associated with the Courageous Lake project. This involves tracking efforts to inform and engage affected parties, as well as responses received from affected parties. This system documents concerns or issues raised by affected parties during engagement activities. In this way, Seabridge is able to identify, understand and respond to issues as they arise. Seabridge will endeavor to respond to comments, concerns and input in a timely manner. Engagement activities are recorded in the database and supporting documents (e.g., maps, letters) are attached to each engagement record. The database also provides a current list of contacts of affected parties.

### **3.4.2** *Reporting*

#### **3.4.2.1** *Internal Reporting*

On an as-needed basis, a summary of engagement activities is prepared from the records in StakeTracker. These reports include a description of the groups involved in engagement, a summary of discussion and key issues raised. Issues and previous responses will be reviewed in order to be prepared for discussions with the affected party.

**Table 1: Summary of Engagement Methods**

<b>Method</b>	<b>Engagement Goal</b>	<b>Approach</b>	<b>Input Received to Date from Affected Parties</b>
Website Information	Inform	The Seabridge Gold Inc. website (www.seabridgegold.net) is used to share technical and investment-related information. Information is intended to reach a broad audience. A project-specific site is under development to provide specific information about Courageous Lake. Website launch is anticipated in the fall 2019.	None to date.
News Releases	Inform	News releases are used to inform affected parties, the public, investors, and media of Company or project-specific information and initiatives and progress updates. News releases may also be provided in response to events that require a Company response.	Seabridge has heard from affected parties that the news releases are informative and would like to continue.
Fact Sheets/FAQs	Inform	Fact sheets (typically one page in length) provide information about the project activities or to clarify issues or respond to common inquiries. Facts sheets are developed in plain language and use graphics, where applicable. They are useful for broad dissemination of information.	Seabridge has heard from affected parties that fact sheets are informative.
Written notification/ Correspondence (e.g., E-mail)	Inform and Engage	Seabridge corresponds with affected parties to provide information, coordinate engagement activities, make inquiries, and to solicit input on a variety of issues related to project activities.	Seabridge has determined that this method is not effective with all affected parties. Some affected parties regularly respond to email correspondence while other groups do not respond to email. This remains an important method of communication for Seabridge.
Phone call	Inform, Engage	Not used as a primary method for conveying information but may be used to follow-up when other methods are unsuccessful.	Seabridge has heard from some affected parties that reminder phone calls are helpful. Parties that do not respond to written correspondence do not usually respond to phone messages either.

Method	Engagement Goal	Approach	Input Received to Date from Affected Parties
Face-to-face Meetings/ Interviews	Inform, Engage and Involve	Face-to-face meetings and interviews allow for focused discussion on specific issues or initiatives. They can also be used to prepare affected parties for the next stages of the engagement process, if relevant. Typically meetings are held between Company personnel and staff or representatives of a community/affected party. Meeting are arranged as required, or in response to inquiries by affected parties. Seabridge tracks input received during meetings, such as questions and responses, comments and concerns and follows-up where appropriate.	Seabridge has received input from affected parties that meetings are helpful to keep up-to-date on the project and Seabridge's activities. Affected parties have indicated that meetings should occur as required throughout the year, and the staff can inform/update Council as required. Meeting with Chief and Councils once a year is generally sufficient during the exploration phase but should increase in frequency if the project plans to move toward development or advanced exploration.
Site Visits	Inform, Engage and Involve	Site visits allow representatives of affected parties to tour the property, observe exploration activities and provide an opportunity to identify and discuss the project and potential issues. Site visits also provide an opportunity to build rapport amongst the parties. Seabridge tracks all inputs received during site visits, such as questions and responses, comments and concerns and follows-up where appropriate.	Seabridge has heard from several affected parties that they find site trips informative. Affected parties indicated that site visits are not needed every year but are helpful when there are new activities planned or there is a major program planned.
Community Meeting	Inform, Engage and Involve	Community meetings are open to the public and/or membership of a community. Community meetings typically involve a presentation and/or posters, and give the public an opportunity to ask questions and give comments. Typically, posters, factsheets and other handouts are also used to provide 'take-away' information on project initiatives and environmental and drilling program schedules. In order to captivate the targeted audience, posters include graphic depictions. Seabridge tracks all inputs received during community meetings, such as questions and responses, comments and concerns.	Seabridge heard from one affected party that community meetings are the only way to engage with their membership.
Workshops	Inform, Engage and Involve	Workshops involve groups of people who are brought together to discuss specific issues and initiatives of the project. Workshops typically include a project update and may also include an academic component to provide a technical understanding of the issue. At the same time, plain language will be used to facilitate broad participation. As needed, translation services are provided to ensure that workshop participants can be involved. Workshops, while focused, allow for group dialogue and discussion on key topics.	Seabridge offered to host a workshop related to caribou but there was no interest.

**Table 2: Implementation of Engagement Activities**

Trigger <sup>7</sup>	Purpose for Engagement	Engagement Method	Frequency / Timeline
Project updates	Dissemination of project-related information	<ul style="list-style-type: none"> <li>■ Written notification</li> <li>■ News releases</li> </ul>	As applicable
Annual work plan review and/or modifications	Provision of work plan summary for comment or questions	<ul style="list-style-type: none"> <li>■ Written notification</li> </ul>	Annual
New permit application	Dissemination of information regarding permit applications, <i>prior to submission</i> to regulator, for comments or support. Identify community concerns, solicit input or suggestions, and address comments/concerns	<ul style="list-style-type: none"> <li>■ Written notification and/or phone notification</li> <li>■ Meetings, site visits and/or community open houses</li> </ul>	As applicable
Amendment to permit (land use permit or water licence)	Dissemination of information regarding any permit amendment, determine potential of community concern, solicit input or suggestions, and address comments/concerns regarding amendment	<ul style="list-style-type: none"> <li>■ Written notification and/or phone notification</li> <li>■ Meetings, site visits and/or community open houses</li> </ul>	As applicable <sup>8</sup>
Revision to management plans	Provision of information regarding changes to management plans, determine areas of community concern, solicit input or suggestions to improve, and address comments/concerns regarding changes	<ul style="list-style-type: none"> <li>■ Written notification</li> <li>■ Face-to-face meetings</li> <li>■ Workshops</li> </ul>	As applicable
Prior to commencement of field work (per season)	Dissemination of information regarding planned field work activities, per season	<ul style="list-style-type: none"> <li>■ Written notification and/or phone conversation</li> </ul>	Once in every field season (winter/spring or summer/fall) should field activities be occurring
Completion of drill programs	Provision of information regarding planned drilling programs	<ul style="list-style-type: none"> <li>■ Written notification</li> </ul>	As applicable
Distribution of report	Dissemination of information regarding monitoring or field report results	<ul style="list-style-type: none"> <li>■ Written notification – letter with accompanying report(s) in electronic and/or paper format</li> </ul>	As applicable (upon completion of monitoring or field work)
Annual report – corporate	Dissemination of Annual Corporate Report	<ul style="list-style-type: none"> <li>■ Written notification</li> <li>■ News release</li> </ul>	As applicable
Press releases – corporate	Dissemination of company-related information	<ul style="list-style-type: none"> <li>■ Written notification</li> <li>■ News releases</li> </ul>	As applicable
Claim staking	Dissemination of information regarding exploration plans/ claim staking activities and information on the locations, and respond to comments or concerns	<ul style="list-style-type: none"> <li>■ Written notification and/or phone conversation</li> <li>■ Meetings, and/or site visit</li> </ul>	As applicable
Employment opportunities	Dissemination of information regarding employment opportunities with Seabridge or its contractors	<ul style="list-style-type: none"> <li>■ Written notification regarding employment opportunities and terms</li> </ul>	As applicable

<sup>7</sup> Most of the triggers are regulatory requirements and information will also be sent to relevant regulators and may be posted on MVLWB public registry.

<sup>8</sup> The Submission of the Land Use Permit Application (anticipated in September 2019) will be disseminated for public review by the MVLWB.

### 3.4.2.2 *External Reporting*

Reporting on engagement after its completion is an important step in the engagement process, as it ensures that those involved see their input was received, understood, and valued. Follow-up reports are typically in the form of meeting notes or minutes that identify the people who participated and provide a summary of the engagement method, topics, action items, and how final decisions were reached, as applicable.

Reports are required by MVLWB to document Seabridge's pre-submission engagement activities related to the land use permit and water licence applications. Summary and detailed chronologic logs are presented in the Exploration Work Plan for the period June 2018 to August 2019, and include a summary of issues raised by affected parties and Seabridge's responses.

To promote transparency, engagement summary logs or reports will be provided to affected parties for comment prior to submission to the MVLWB or other regulators. For example, summaries of engagement activities and issues identified during the pre-submission engagement phase for the renewal of the land use permit MV2012C0025 were shared with affected parties in August 2019, for their review and comment prior to submission as part of the application package.

## 3.5 Plan Review

It is important that the effectiveness of the engagement efforts be monitored and evaluated against the goals of the Engagement Plan. Where a method does not appear to be effective or when the scope or importance of an issue changes, it may be necessary to modify the Plan.

### 3.5.1 *Reviewing and Updating the Engagement Plan*

Seabridge will review the Plan annually, at a minimum, with consideration of the following factors:

- Considering changes to the triggers and methods, including activities to be added, removed, or amended in response to changing needs of potentially affected parties.
- Evaluating the extent to which engagement methods were implemented in accordance with the planned approach. This may involve adapting the methods and frequency of engagement activities.
- Updating the contact information for the affected parties (Appendix C).
- Assessing the effectiveness of engagement and relationship-building, and whether additional effort and/or an adjusted approach would support the Seabridge's goals.

Overall, the purpose of the Plan review is to ensure that the purpose and goals of engagement (defined in Sections 1.1 and 1.2) are being achieved. The review process allows for lessons learned during engagement to be incorporated into Plan updates. Table 3 provides an overview of Engagement Plan review performance indicators.

### 3.5.2 *Special Circumstances*

Outside of the annual review, revisions to the Plan may also be required in the following situations:

- if there is a significant change to the regulatory process;
- in response to instruction from regulators; or
- to ensure that new commitments (e.g., items embodied in formal or informal agreements with affected parties) are included and monitored as part of the overall engagement plan

**Table 3: Engagement Plan Performance Indicators**

	<b>Review Objectives</b>	<b>Indicators</b>
Annual Engagement Plan Review	<ul style="list-style-type: none"><li>■ Confirm contact list for affected parties</li><li>■ Ensure engagement tracking is complete and comprehensive</li><li>■ Ensure issues raised by affected parties are tracked, and responses are prepared in a timely manner</li><li>■ Incorporate feedback on engagement approaches, as applicable</li></ul>	<ul style="list-style-type: none"><li>■ Up-to-date contact information</li><li>■ Records of place, time, affected groups involved, number of participants</li><li>■ Number and types of comments or issues received from affected parties; number of comments with confirmed responses</li><li>■ Number of revisions to Engagement Plan methods based on input.</li></ul>

#### 4. SEABRIDGE INTERNAL ROLES AND CONTACT INFORMATION

The following Seabridge personnel are involved in engagement as defined under this Plan:

- Jay Layman – President and Chief Operating Officer
- Brent Murphy – Senior Vice President, Environmental Affairs
- Elizabeth Fillatre Miller – Vice President, Environment
- Jane Howe – Permitting Manager
- Taryn Cutler – Community Liaison
- Neggar Shafai– Manager, Administration

Ms Elizabeth Fillatre Miller is the primary contact for the Engagement Plan. Any questions or comments related to engagement activities should be directed to her.

Mr. Brent Murphy ([brent@seabridgegold.net](mailto:brent@seabridgegold.net)) remains as an alternate contact.

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## **APPENDIX A      SEABRIDGE ENVIRONMENTAL POLICY**

## ENVIRONMENTAL POLICY

The Company strives to be an exemplary leader in environmental management. We intend to meet or surpass existing regulatory standards and minimize undesirable impacts on the environment to the extent possible. To meet this objective we will:

- At a minimum, meet all regulatory requirements;
- Recognize environmental management as an important corporate priority and integrate environmental considerations into all mine exploration, development, operational and closure planning;
- Assess the potential environmental risks of project design so that effective preventive measures can be established;
- Use industry leading practices and technologies that are aimed to improve environmental performance intended to enhance quality of water, air, vegetation and wildlife;
- Continuously improve the efficient use of resources, processes and materials;
- Participate in recycling programs to the extent possible and commercially feasible;
- Optimize the use of resources to ensure the conservation of natural resources and consumer goods such as energy;
- Require contractors and suppliers to provide operational guidelines and procedures which meet their environmental responsibilities, as part of the bid and procurement process;
- Consider environmental guidelines when purchasing equipment and materials;
- Communicate environmental information to our employees including changes and potential changes to environmental regulations as well as technological developments that may mitigate impacts;
- Develop guidelines for training and education of employees;
- Work with government agencies, the public, Treaty Nations, First Nations and stakeholders to develop open communications for a shared understanding of the Company's environmental protection programs and responsibilities;
- To the extent that is practical and commercially reasonable, work to remediate disturbed ecosystems to enable them to revert to their original state or an alternative sustainable state which optimizes biodiversity and benefits to the wider community.

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

## **APPENDIX B      SUMMARY OF INPUT FROM AFFECTED PARTIES ON REVISIONS TO THE ENGAGEMENT PLAN**

## Appendix B: Summary of Input from Affected Parties on Revisions to the Engagement Plan

Affected Party	Section of the Plan	Method for Provision of Feedback	Comment	Response
NSMA	Appendices	Email June 7, 2019	NSMA provided new contact information.	New contact information incorporated into Appendix C.
	General	Email June 7, 2019	NSMA indicated that the proposed engagement identified in v1.3 of the Engagement Plan suits the needs of NSMA. For notification and meetings, primary contact by email and follow-up by phone is sufficient. Statement that Seabridge Gold has been a leading partner in terms of early, frequent and respectful engagement.	No changes required.
	Methods of Engagement	Meeting Jan. 14, 2019	Regarding future engagement activities: Once-a-year project update meetings are reasonable frequency during exploration phase. NSMA have received Seabridge press releases and corporate info and would like to continue to receive these. Face-to-face meetings with staff are also effective means to communicate information to leadership.	Considered in Tables 3.1 and 3.2.
YKDFN	Appendices	Meeting July 17, 2018	YKDFN provided updated contact information for staff	Incorporated into Appendix C.
	Methods of Engagement	Meeting July 17, 2018	A TK/TLU Study and technical reports, especially the caribou and archaeology reports, are very informative. Staff are too busy and not interested in workshops unless the matter is very important; Site visits have been good in past – but need something new to show and discuss.	Considered in Tables 3.1 and 3.2.
	Methods of Engagement	Meeting Jan. 14, 2019	YKDFN informed Seabridge that they are implementing a new way of doing business that is more responsive and timely and they have moved away from requiring Exploration Agreements. They are interested in other models that encourage collaboration, engagement and opportunities for the YKDFN to provide feedback.	Considered in Tables 3.1 and 3.2.

Affected Party	Section of the Plan	Method for Provision of Feedback	Comment	Response
YKDFN (cont'd)			<p>Examples of opportunities for engagement were discussed including: prior to submitting permit applications, prior to developing management plans, and prior to conducting prefeasibility studies or mine design.</p> <p>YKDFN indicated they would be happy to provide comments on Engagement Plan. Seabridge discussed and shared an example of a Communications Protocol with a First Nation in British Columbia and explained how the protocol is intended to encourage collaborative communications and support capacity building.</p>	
	Appendices	Meeting Jan. 14, 2019	YKDFN provided updated contact information.	Incorporated into Appendix C.
	Methods of Engagement	Meeting June 11, 2019	A site visit would be helpful, given TK study that is underway.	Considered in Tables 3.1 and 3.2.
LKDFN	Appendix	Telephone June 27, 2018	R. Griffith provided updated contact information.	Incorporated into Appendix C.
	Methods of Engagement	Telephone July 17, 2018	L. King indicated that Chief and Council prefer to meet directly with companies. Seabridge should ask Chief and Council if there are any other methods of engagement they wish.	Considered in Tables 3.1 and 3.2.
	Appendices	Telephone May 24, 2019	LKDFN reception provided updated contact information.	Incorporated into Appendix C.
	Methods of Engagement	Telephone May 31, 2019	S. Catholique indicated Lutselk'e had a preference for companies to engage with the entire community, Elders, Chief, Council and the Land and Wildlife Committee members.	Considered in Tables 3.1 and 3.2.
	Methods of Engagement	Meeting July 17, 2019	Seabridge was told that Chief, all Councillors and Committee members and more community members should be present for a good community meeting. Site visits are very helpful to understand the project activities and impacts; they like to receive technical and summary reports about project environmental monitoring particularly caribou.	Considered in Tables 3.1 and 3.2.
	Appendices	Telephone July 30, 2019	Revised contact information.	Incorporated into Appendix C.

Affected Party	Section of the Plan	Method for Provision of Feedback	Comment	Response
Tłıchq	Appendices	Meeting July 19, 2018	G. Mackenzie explained her role and the role of the Kwe Beh Working Group. She clarified that all correspondence from Seabridge should go to her and Henry Zoe, and they will synthesize and provide contextual information for the Chiefs and Council.	Information incorporated into Appendix C.
	Methods of Engagement	Meeting July 19, 2018	The Working Group has monthly meetings and may ask Seabridge to attend/present about project - this might be a good opportunity during pre-submission period. She appreciates company summaries, press releases and notices about work plans/start/end. Please continue to send technical reports to her and she will forward.	Considered in Tables 3.1 and 3.2.
	Appendices	Meeting Nov. 8, 2018	G. Mackenzie confirmed that she is the contact for employment opportunities	Incorporated into Appendix C.
	Methods of Engagement	Meeting Jan. 17, 2019	Continue to share information about the project/updates to TG and the Working Group through G. Mackenzie; The Working Group shares information with Chief and Council who share with the communities as appropriate. Working Group members would see value in a site visit to Courageous Lake once exploration advances and there are new development plans. For now, once-a-year project update meetings are reasonable during exploration phase. If the project proceeds to advanced exploration, they may want more frequent meetings. They like to receive Seabridge press releases and corporate info.	Considered in Tables 3.1 and 3.2.
	Appendices	Meeting Jan. 17, 2019	Reconfirmed that all correspondence and information should be sent to G. Mackenzie and H. Zoe. Do not send anything to the Chiefs or the communities.	No change required
AIMAIO	Appendices	Telephone	Confirmed contact information is still valid.	Incorporated into Appendix C.
NWTMN	Appendices	Telephone Nov. 2, 2018	T. Heron confirmed contact information, send info and documents to him. For meeting requests contact the NWTMN President's Office.	Incorporated into Appendix C.

*Note: The MVLWB confirmed with Seabridge that Federal and Territory governments are not considered affected parties and therefore input on engagement approach was not sought from these groups.*

## **APPENDIX C      LIST OF AFFECTED PARTIES AND THEIR DESIGNATED CONTACTS**

## Appendix C: List of Affected Parties and their Designated Contacts

Date: April 2020

Organization / Affected Party	Name	Position	Contact Information	Comments
<b>Yellowknives Dene First Nation</b>  <b>Physical Address:</b> 901 Sikyea Tili, 2nd Floor Deton Cho Bldg Ndilo  <b>Mail:</b> PO Box 2514 Yellowknife, NWT X1A 2P8	Edward Sangris	Chief - Dettah		Do not sent any communications directly to Chief/Councillors.
	Ernest Betsina	Chief – N'Dilo		Do not sent any communications directly to Chief/Councillors.
	Jason Snaggs	Chief Executive Officer	<a href="mailto:JasonS@ykdene.com">JasonS@ykdene.com</a> (office) 867-873-4307	
	Sarah Gillis	Director Environment Department	<a href="mailto:SarahT@ykdene.com">SarahT@ykdene.com</a> (office) 867-873-8951 x1013 (cell) 867-445-5840	All project correspondence and communications, including job opportunities should be sent to Director of Environment (and cc CEO) who will forward it as appropriate.
	Johanne Black	Acting/Director of Language, Culture, and History	<a href="mailto:jblack@ykdene.com">jblack@ykdene.com</a> (office) 867-873-8951 (cell) 867-445-2332	Correspondence and communications related to cultural matters such as archaeology, traditional use, TK should be sent to Director of Language, Culture and History.
<b>Lutsel K'e Dene First Nation</b>  <b>Mail:</b> PO Box 28 Lutsel K'e, NWT X0E 1A0	Darryl Marlowe	Chief		Do not sent any communications directly to Chief/Councillors.
	Glen Guthrie	Manager of Wildlife, Lands and Environment	<a href="mailto:lkdfnlands@gmail.com">lkdfnlands@gmail.com</a> 867-370-7012	All correspondence should be sent to Manager Wildlife, Lands and Environment, who will forward it as appropriate
<b>Akaiicho Interim Measures Agreement Implementation Office</b>  <b>Mail:</b> PO Box 28 Lutsel K'e, NWT, X0E 1A0	Stephanie Poole	Screening Officer	<a href="mailto:screeningofficer@eastarm.com">screeningofficer@eastarm.com</a> 867-370-3217	Forward information related to project updates and permitting activities to Screening Officer. AIMA0 has previously indicated that they would like to be cc'd on matters related to engagement with YKDFN and LKDFN.

Organization / Affected Party	Name	Position	Contact Information	Comments
<b>Tłjchq Government</b>  <b>Physical Address:</b> 4308-50th Avenue Yellowknife, NWT X1A 1B5  <b>Mail:</b> PO Box 412 Behchokq, NWT NOE0Y0	George Mackenzie	Grand Chief		Do not sent any communications directly to Grand Chief or Community Chiefs.
	Charlie Football	Chief – Wekweèti		
	Clifford Daniels	Chief – Behchokq		
	David Wedawin	Chief – Gamèti		
	Alfonz Nitsiza	Chief – Whatì		
	Grace Mackenzie	Department of the Executive Mines Liaison Coordinator	<a href="mailto:gracemackenzie@tlicheo.com">gracemackenzie@tlicheo.com</a> 867-766-4003 x1007	All correspondence for TG pertaining to project updates, general information, job opportunities or of a corporate nature should be sent to the Mines Liaison Coordinator and cc'd to the Senior Community Director and Manager Lands Regulation. Correspondence will be forwarded as appropriate.
	Henry Zoe	Senior Community Director	<a href="mailto:henryzoe@Tljchq.com">henryzoe@Tljchq.com</a>	
	Violet Camsell-Blondin	Manager, Lands Regulation Dept. of Culture and Land Protection	<a href="mailto:violetcamsellblondin@tlicheo.com">violetcamsellblondin@tlicheo.com</a> 867-392-6381 x1336	All correspondence for TG pertaining to permitting should be sent to the Manager Lands Regulation.
Tyanna Steinwand	Manager Research Dept. of Culture and Land Protection	<a href="mailto:tyannasteinwand@tlicheo.com">tyannasteinwand@tlicheo.com</a> 867-392-6381 x1357	Correspondence related to archaeology permits, wildlife studies.	

Organization / Affected Party	Name	Position	Contact Information	Comments
<b>North Slave Métis Alliance</b>  <b>Physical Address:</b> 32 Melville Drive Yellowknife, NWT  <b>Mail:</b> 32 Melville Drive PO Box 2301 Yellowknife, NWT X1A 2P7	Bill Enge	President	<a href="mailto:billenge@nsma.net">billenge@nsma.net</a>	
	Marc Whitford	Vice President	<a href="mailto:mgwhitford@northwestel.net">mgwhitford@northwestel.net</a>	
	Adelaide Mufandaedza	Manager, Environment	<a href="mailto:adelaide@nsma.net">adelaide@nsma.net</a> 867-873-6762 x 1006	
	Jess Hurtubise	Regulatory Analyst	<a href="mailto:Jess.Hurtubise@nsma.net">Jess.Hurtubise@nsma.net</a> 867-873-6762 x1005 (cell) 867-446-4480	All correspondence and communications should be sent to Regulatory Analyst and cc'd to the Environment Manager, Information will be forwarded as appropriate.
			<a href="mailto:general@nsma.net">general@nsma.net</a>	Job opportunities
<b>NWT Métis Nation</b>  <b>Mail:</b> PO Box 720 Fort Smith, NWT X0E 0P0	Garry Bailey	President	<a href="mailto:president.nwtmn@northwestel.net">president.nwtmn@northwestel.net</a>	
	Ursula Vogt	Executive Director	<a href="mailto:ursula.vogt@nwtmetis.ca">ursula.vogt@nwtmetis.ca</a> 867-872-2770 (cell) 867-621-0577	Requests for meetings
	Tim Heron	Lands and Resources Manager	<a href="mailto:tim.heron@nwtmetis.ca">tim.heron@nwtmetis.ca</a> 867-872-2770 (cell) 867-621-0588	All correspondence and communications should be sent to Lands and Resources Manager and cc'd to the Executive Director, Information will be forwarded as appropriate.