

**KIWETINOHK ENERGY CORP.
RESPECTFUL WORKPLACE AND VIOLENCE PREVENTION POLICY**

1.0 Purpose and Scope

Kiwetinohk is committed to providing a physically and emotionally healthy workplace free of harassment and bullying and to providing a work environment in which all people are treated with respect and dignity. Kiwetinohk expects all people working in its operations to contribute to a healthy and happy work environment and to protect each other from abusive behavior by any person engaged by Kiwetinohk or any of its contractors.

Kiwetinohk recognizes that workplace harassment, bullying and violence can arise from many sources. Our Respectful Workplace and Violence Prevention Policy makes clear that harassment, bullying and/or violence in the workplace, in any form, and from any person is unacceptable and will not be tolerated by Kiwetinohk. Employees, contractors and other workers who violate this Respectful Workplace and Violence Prevention Policy will be subject to corrective action, including termination of employment or contract (and, possibly, disqualification from re-engagement) without notice or pay in lieu thereof.

2.0 Definitions

“Kiwetinohk” or the **“Corporation”** means Kiwetinohk Energy Corp. and includes its subsidiaries where the context requires.

“Worker” means people who perform services for Kiwetinohk or a contractor in its engagement with Kiwetinohk, including all employees, contractors, subcontractors, temporary employees or any other individual providing services to Kiwetinohk.

“Workplace” includes any place where workers engage in Kiwetinohk business, activities or social events.

“Workplace bullying” means inappropriate conduct or comments by a person towards a worker that the person knew or reasonably ought to have known would cause that worker to be humiliated or intimidated.

“Workplace harassment” means engaging (i) in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome; or (ii) workplace sexual harassment. Workplace harassment may (but does not necessarily) relate to the prohibited grounds of discrimination as set out in applicable human rights legislation.

Note: Reasonable action taken by Kiwetinohk, management or a supervisor relating to the management and direction of workers in the workplace is not workplace harassment or workplace bullying, unless such actions are carried out in an abusive or threatening manner (although supervisors may remind workers that certain types of undesirable or sub-standard conduct or failures to conduct can result in termination of engagement of the worker) . This is the case even if there are sometimes unpleasant consequences for a worker.

“Workplace Sexual Harassment” means:

- a. 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; or
- b. making a sexual solicitation or advance where the person making the solicitation or advance 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.

3.0 Principles and Rules

3.1 Workers’ Responsibilities

All workers are responsible for:

- 1) Ensuring their conduct in the workplace is appropriate and they do not engage in workplace harassment, workplace bullying or workplace violence;
- 2) Reporting incidents of workplace harassment, bullying and/or violence that they witness or experience in accordance with this policy;
- 3) Seeking any medical or health advice or referrals of their choice when necessary;
- 4) Cooperating with all investigations under this policy;
- 5) Maintaining confidentiality if they are involved in a complaint, including involvement as a witness, unless necessary to obtain advice about their rights or to seek out medical or mental health treatment.

3.2 Complaint Process

Any worker who believes that he or she is the subject of workplace harassment and/or workplace bullying, or who has witnessed workplace harassment and/or workplace bullying, must report such incidents to any of Janet Annesley, Chief Sustainability Officer at jannesley@kiwetinohk.com or to any of Tim Alberts, VP Production, Mike Carlson, VP Completions, or Mike Backus, COO, Upstream. Alternatively, if the person so chooses, they may use the whistleblower reporting system described on the Corporation's website: www.kiwetinohk.com (see "Contact Us" page).

Complaints or information relating to workplace harassment and/or workplace bullying may be made orally or in writing. However, a written and signed report must be provided to initiate a formal complaint.

Note: In the case of emergency, where there is immediate danger to anyone, call 9-1-1 immediately.

3.3 Investigation Process

3.3.1 Investigations

Kiwetinohk will ensure all concerns, complaints or incidents of workplace harassment, bullying and/or workplace violence are investigated. Investigations will:

- be undertaken promptly and diligently;
- be fair and impartial, providing both the complainant and respondent(s) equal treatment in evaluating the allegations;
- be sensitive to the interests of all parties involved, and maintain confidentiality to the extent possible or practicable;
- be focused on finding facts and evidence, including interviews of the complainant, respondent(s), and witnesses; and
- incorporate, where appropriate, any need or request from the complainant or respondent(s) for assistance during the investigation process.

Upon receipt of a complaint of workplace harassment or workplace bullying, Pat Carlson, CEO or an executive assigned by him, will determine who will conduct the investigation into the incident or complaint under this policy. If necessary, due to the nature of the incident, or the individuals involved, an external person qualified to conduct an impartial investigation will be retained to conduct the investigation.

The steps taken by the investigator will vary depending upon allegations, but will generally involve private interviews with the complainant, with the person alleged to have engaged in the inappropriate behaviour, and with any witnesses, as well as a review of any documents relevant to the complaint.

3.3.2 Investigation Measures

During the investigation, interim measures may be taken by Kiwetinohk. For example, Kiwetinohk may separate the individuals involved and may choose to suspend the worker alleged to have breached this policy. Additionally, workers may be referred to the employee assistance program or be encouraged to seek medical or other advice.

The investigator will also provide a written report to Kiwetinohk setting out the allegations and the investigation's facts and findings.

3.3.3 *Investigation Records*

Kiwetinohk expects workers to keep written accounts of incidents. Kiwetinohk will keep records of all investigations for two (2) years.

3.4 Confidentiality

Confidentiality is core to this policy and to the integrity of the investigation process. Information obtained about incidents or complaints and from investigations, including identifying information about any individuals, will be kept confidential to the extent possible.

3.5. Consequences of Non-Compliance

3.5.1 *Corrective and Rehabilitative Actions*

Workplace harassment, bullying and/or workplace violence will not be tolerated. Corrective and rehabilitative action resulting from an investigation which determines a worker has engaged in workplace harassment, bullying or workplace violence may include one or more of the following:

- Requirement for a formal apology;
- Counseling;
- A written notice kept on file;
- A change of work assignment of either person;
- A requirement to attend bullying and violence prevention training; and/or
- The suspension or termination of the Worker or in the case of a contractor or employee of a contractor abolishment from Kiwetinohk work places, including termination of employment without notice or pay in lieu thereof.

3.5.2 *No Reprisals or Retaliation*

Workers will not be penalized or disciplined for reporting in good faith any incident or for participating in an investigation involving workplace harassment, bullying and/or violence. However, false or malicious accusation of workplace harassment, bullying

and/or violence cannot be tolerated and may result in corrective action, including termination of employment without notice or pay in lieu thereof.

Also, workers are protected by law from, and Kiwetinohk prohibits, discrimination, reprisal or threats against anyone who makes good faith use of this policy. Retaliation will result in corrective action, including termination of employment without notice or pay in lieu thereof.

3.7 Complaints Involving Members of the Public

3.7.1 Workplace Harassment, Bullying and/or Violence by Members of the Public

This policy applies to workplace harassment, bullying and/or workplace violence that may be perpetrated by individuals who are not workers, but who are present in Kiwetinohk's workplace. This includes, but is not limited to, individuals such as contractors, suppliers, clients, visitors or other members of the public.

3.7.2 Domestic Violence

Kiwetinohk is committed to reducing the risk of domestic violence in the workplace. Kiwetinohk will support workers who believe they are at risk of being subjected to domestic violence in the workplace, using appropriate and confidential outside support, as appropriate.

Kiwetinohk will take all reasonable precautions to protect workers, in the workplace, from domestic violence, including cooperating fully in the enforcement of any orders of protection.

4.0 Other Matters

No worker forfeits their right to pursue any other legal avenues available by virtue of participating in Kiwetinohk's investigatory process. For example, this policy does not prevent or discourage a worker from filing an application with the applicable human rights authority on a matter relating to applicable human rights legislation.

Kiwetinohk also reserves the right to take action as necessary for the protection of its workers or its business prior to the investigation process set out in this policy.

5.0 Related Policies and Mandates

None identified.

Privacy Policy

6.0 Review and Modification

Any Kiwetinohk employee may recommend this policy be reviewed or propose modification to this policy to the CEO. The CEO or delegates will review and revise this policy if a breach occurs and revisions are necessary, or at any other time as the CEO determines, at minimum every year.

Approved on January 4, 2022