

KIWETINOHK ENERGY CORP. WHISTLEBLOWER POLICY

1.0 Purpose and Scope

Kiwetinohk seeks to operate safely, lawfully and with the highest ethical standards. Kiwetinohk values integrity, transparency, and accountability in all its practices. Kiwetinohk wishes to instill in its employees and contractors the duty to ask questions and vocalize concerns, to detect potential violations of our Code of Conduct early, and, moreover, to earn a reputation as a workplace where questions are raised routinely without fear of any form of discrimination, retaliation or harassment.

Kiwetinohk’s Whistleblower Policy is set forward to further support the Code of Conduct and its safety and respectful workplace culture by outlining information and procedures for the confidential and anonymous submission of any Expression of Concern.

The Whistleblower Policy applies to Kiwetinohk’s directors, officers, employees, contractors and suppliers.

2.0 Definitions

Board	Kiwetinohk’s board of directors.
Code of Conduct	Kiwetinohk’s Code of Conduct
Expressions of Concern	<p>Broad definition including any matter that, in the view of the complainant, represents:</p> <ul style="list-style-type: none"> • questionable business practices; • inappropriate accounting treatment; • inadequate internal controls; • auditing matters (including misleading or excessive influence); • disclosure of fraudulent or misleading financial information; • fraud; • misappropriation of corporate assets; • any activity believed to be illegal, unethical or dangerous to people or the bio/physical environment; • breaches of Kiwetinohk’s Code of Conduct; • actions that have the effect of concealing any of the foregoing; or • general complaint.
Kiwetinohk or the Corporation	Kiwetinohk Energy Corp., and its subsidiaries where the context requires.

3.0 Principles and Rules

All staff, consultants, contractors, suppliers or other concerned persons are required to immediately report any known or suspected ethical or legal misconduct or safety incident. They must never retaliate or ignore acts of retaliation against others. Any team member who fails to report a violation may be subject to discipline, up to and including termination.

Staff and contractors are encouraged to raise concerns to their immediate supervisor. If this does not resolve the issue, if you are not comfortable bringing the concern to your immediate supervisor, if the concern involves your supervisor, or if you are outside the organization, please go to one of the following members of the Whistleblower Committee or contact the Whistleblower Office per the below:

- Chair of the Board
- Chief Executive Officer
- Chief Sustainability Officer
- Chief Financial Officer
- Executive Vice President, Land & Community Relations
- Vice President Production

Or mail may be marked “Whistleblower; Confidential” and addressed to the Chair of Board and Lead Director of the Board at the following mail address:

Suite 1700, 250 - 2 Street S.W. Calgary, AB
T2P 0C1

Or the following e-mail address: whistleblower@kiwetinohk.com

Mail or e-mail directed to “Whistleblower” will be received and directed to the Chair of Board and Lead Director of the Board for their further handling.

Recipients of Expressions of Concern will convene a meeting of the Whistleblower Committee to determine what action should be taken and what if any response should be issued. All information disclosed during the course of an investigation will remain confidential, except as necessary to take action in accordance with Kiwetinohk’s policies and applicable laws.

If an Expression of Concern includes accusations against any member of the Whistleblower Committee, that member will be excluded from the committee proceedings. However, the Whistleblower Committee will notify the accused person of the Expression of Concern and allow the member to provide comments if he/she chooses.

Expressions of Concern that involve Kiwetinohk’s accounting, auditing, internal controls and disclosure practices will be reviewed under the direction and oversight of the Audit Committee of the Board. In reviewing such reports, the Audit Committee may

seek assistance and direction from whomever the Audit Committee thinks appropriate including, without limitation, external legal counsel or auditors. If the report relates to a non-financial matter, one of the other committees of the Board may be charged with oversight.

Persons who report incidents are encouraged to provide as much specific information as possible including names, dates, places and events that took place, the person's perception of why the incident(s) may be a violation and, if comfortable, their contact details.

The Whistleblower Committee (excluding any persons who may be the subject of the expression of concern under investigation), will investigate all Expressions of Concern, recommend responding action and report to the Board. The Whistleblower Committee will determine and issue a response to the whistleblower and to persons identified by the whistleblower if it deems appropriate.

Kiwetinohk's Whistleblower Policy forbids retaliation for the act of whistleblowing regardless of the determination of any follow-up investigation. Anyone who has provided an Expression of Concern under this policy and has been subject to retaliation by Kiwetinohk or any of its employees should report the retaliation to the Chair of the Governance and Nominating Committee of the Board.

Disciplinary action will be taken in response to retaliatory actions, or encouragements to take retaliatory actions.

Quarterly reports on the status of complaints will be made to the Board.

4.0 Other Matters

Everyone engaged in the service of Kiwetinohk are expected to follow the Code of Conduct, to ask questions and raise concerns internally, and to make use of the Whistleblower Policy as required.

When a person on the Whistleblower Committee changes title, then the person assigned that title (or the closest new title) will assume the Whistleblower Committee position until the Board can consider and approve a new Whistleblower Committee.

5.0 Related Policies and Mandates

Code of Conduct

6.0 Review and Modification

Modification of this policy requires the approval of the Board. Proposals to modify may be initiated by management or any member of the Board.

In addition to any review as a result of proposed modification, this policy will be reviewed at minimum annually.

Reviewed and approved by the Board and the Governance and Nominating Committee on November 7, 2023.