

## SECURE ENERGY SERVICES INC.

### WHISTLEBLOWER POLICY

#### PURPOSE

The integrity, transparency and accountability of the financial, operational, administrative and management practices of SECURE Energy Services Inc. (the "**Corporation**") is critical. The financial and operational information respecting the Corporation guides the decisions of the board of directors of the Corporation (the "**Board**") and is relied upon by shareholders of the Corporation and the financial markets. For these reasons, it is critical for the Corporation to maintain a workplace where concerns regarding questionable business practices can be raised without fear of any discrimination, retaliation or harassment.

#### PROCEDURES

All of the Corporation's directors, officers, employees, contractors and consultants (each, a "**Member**") have a responsibility to promptly report either verbally or in writing to their immediate supervisor, or in the case of a director or the Chief Executive Officer, the Chair of the Audit Committee, all evidence of activity by a department of the Corporation or another Member that may constitute any of the following:

- questionable accounting or auditing matters;
- inadequate internal accounting controls;
- the misleading or coercion of auditors;
- disclosure of fraudulent or misleading financial information;
- instances of corporate theft or fraud;
- any material misrepresentation in any written or verbal disclosure made by or on behalf of the Corporation;
- breaches of the Corporation's Code of Business Conduct or any other corporate governance policies; and
- the contravention of any laws or regulations that apply to the Corporation's business or operations.

If a satisfactory response is not received from an immediate supervisor, or if a Member is uncomfortable addressing concerns to such supervisor, the Member may contact any senior officer of the Corporation.

If a satisfactory response is not received from such senior officer, or if a Member is uncomfortable addressing concerns to a senior officer, the Chair of the Audit Committee may be contacted either directly via regular mail or indirectly utilizing the services of an independent and confidential intermediary, EthicsPoint. Contact details are as follows:

Via regular mail: Chair of Audit Committee  
c/o 2300, 225 – 6<sup>th</sup> Avenue S.W. Calgary, AB T2P 1N2

EthicsPoint toll-free phone number: (844) 201-9811

EthicsPoint web portal: <https://secure.ethicspoint.com/domain/media/en/gui/42094/index.html>

Anonymous written or telephone communications will be accepted.

Members who report incidents are encouraged to provide as much specific information as possible including names, dates, places and events that took place, the Member's perception of why the incident(s) may be a violation, and what action the Member recommends be taken.

## **INVESTIGATIONS AND REMEDIAL ACTION**

All complaints received under this Policy will be promptly and thoroughly investigated, and all information disclosed during the course of the investigation, including the identity of the Member who brought the complaint, will remain confidential, except where disclosure of such information is necessary to conduct the investigation and take any remedial action and subject to applicable law.

If it becomes necessary to disclose confidential information received under this Policy to conduct an investigation or take remedial action, such information will only be disclosed on a need to know basis and only to the extent the recipient of such information requires the information to adequately investigate the complaint.

All reports made to supervisors and senior officers in respect of matters specifically covered by this Policy will be reported to the Audit Committee.

If an investigation establishes that a Member has engaged in conduct or actions in violation of the Corporation's Code of Business Conduct or other corporate governance policies or applicable law, the Corporation will promptly take remedial action up to and including termination of that Member's relationship with the Corporation and, if warranted, legal proceedings.

## **RETALIATION**

A Member who in good faith reports an incident in accordance with this Policy will be protected from threats of retaliation, harassment, discharge, or other types of discrimination, including but not limited to, threats respecting compensation or terms and conditions of employment, that are directly related to the disclosure of such reports. If a Member believes they have been unfairly or unlawfully retaliated against as the result of making a report under this Policy, they may file a complaint with their supervisor or with a senior officer in instances where they are uncomfortable filing the complaint with their supervisor. If such a person is uncomfortable filing the complaint with a supervisor or any senior officer, they may file their complaint with the Chair of the Audit Committee.

## **FALSE REPORTS AND FAILURE TO COOPERATE**

All reports submitted under this Policy in good faith will be taken seriously. However, the Corporation reserves the right to discipline any Member who makes an accusation without a reasonable, good faith belief in the truth and accuracy of the information or who knowingly provides false information or makes false accusations. Such discipline may result in the termination of the Member's relationship with the Corporation and, if warranted, legal proceedings.

All Members have a duty to co-operate in an investigation conducted under this Policy. Should a Member fail to co-operate or knowingly provide false information in an investigation, the Corporation will take effective remedial action commensurate with the severity of the offence. Such remedial action may include disciplinary measures up to and including termination of the Member's relationship with the Corporation and, if warranted, legal proceedings.

Adopted by the Board on February 5, 2010. Last reviewed and/or amended on October 28, 2021.