



## WHISTLEBLOWER POLICY

### A. Purpose

Storm Resources Ltd. ("Storm" or the "Company") is committed to the highest standards of transparency, honesty and operational and financial accountability.

To support this objective Storm has put in place a policy (the "Policy") for employees, management, officers, directors, contractors, consultants and business partners, including joint venture partners and suppliers. This Policy enables individuals to confidentially and anonymously report complaints and concerns regarding activities which are illegal or contrary to Storm's business practices and potentially detrimental to the reputation or to the business of the Company. All complaints and concerns will be received, retained and investigated by the appropriate body as outlined in this Policy.

### B. Reportable Conduct

While not seeking to erode existing reporting structures, or to create a culture of complaint, Storm encourages the reporting of concerns regarding activities, incidents and practices affecting the Company's operations, accounting, internal controls, record keeping, as well as violations of the law or Storm's corporate policies.

Such circumstances may include, but are not limited to, the following:

- manipulation of production information;
- intentional breach of, or failure to implement, accounting and auditing policies, practices and procedures;
- inappropriate or fraudulent commercial relationships with suppliers and contractors;
- deception or coercion of auditors, inspectors, officials, etc.;
- disclosure of fraudulent or misleading operating or financial information;
- concealment of spills, injuries or property damage;
- misuse or damage to Company or supplier equipment;
- violations of corporate policies including, but not limited to, Storm's Disclosure Policy and its Code of Business Conduct and Ethics;
- suspect or questionable practices or procedures pertaining to environmental and occupational health and safety matters;
- instances of abusive, harassing or offensive conduct in the workplace;
- workplace drug and alcohol abuse;
- sexual or ethnic harassment;
- instances of corporate fraud.

### C. Reporting a Complaint

Any person reporting a known violation, making a complaint, or raising a concern under this Policy, will be protected, providing the person discloses the information in good faith, believes it to be substantially true, does not act maliciously or make false allegations, and does not seek any personal or financial gain.

Complaints and concerns can be reported directly in person, or anonymously reported via email, telephone or regular mail. A logical first step is to report the matter to your immediate supervisor. However, if you do not feel comfortable reporting the information to your immediate supervisor, any senior officer of Storm may be contacted (President & Chief Executive Officer, Chief Financial Officer, Chief Operating Officer or any Vice President).

In instances where you are uncomfortable reporting your concerns to a senior officer, or a satisfactory response is not received from such senior officer, the Chairman of the Audit Committee of Storm may be contacted by telephone, regular mail or email as follows:

Personal and Confidential  
 Jim Wilson, Director  
 c/o #600, 215 – 2<sup>nd</sup> Street S.W.  
 Calgary, Alberta T2P 1M4  
 Telephone: 1-833-343-4779  
 Email: [whistleblower@stormresourcesltd.com](mailto:whistleblower@stormresourcesltd.com)

If reporting by regular mail, please mark the envelope “Personal and Confidential”.

Reporting parties are encouraged to provide as much specific information as possible including names, dates, places and events that took place, the reporting party’s perception of why the circumstances may be a violation, and what action the reporting party recommends be taken. It is also necessary to provide information that will enable someone to contact you for follow up.

#### **D. Investigating a Report**

All reports and complaints under this Policy will be promptly and efficiently addressed. In order to protect individuals and those accused of misdeeds or possible violations, initial enquiries may be made to determine whether an investigation is appropriate and, if so, what form it should take.

Where appropriate, the matters raised may be: a) investigated by management, the Board of Directors or its committees, or legal counsel; b) referred to the police; c) referred to the external auditor; or d) form the subject of an independent inquiry to be conducted by a third party engaged by the Board of Directors. The overriding principle which Storm will have in mind is the best interests of Storm, its employees and its shareholders.

Some concerns may be resolved by agreed action without the need for a further investigation or action. If urgent action is required, it may be taken before an investigation is completed.

Within fifteen (15) business days of a concern being raised, the party making the complaint will receive from an appropriate representative of the Company:

- acknowledgment that the concern has been received;
- indication regarding how the matter is to be dealt with;
- an estimate of how long it will take to provide a final response;
- advice as to whether any initial enquiries have been made; and
- advice as to whether further investigation will take place and if not, why not.

Storm will take steps to minimize any difficulties which the reporting party may experience as a result of raising a concern. For instance, if the reporting party is required to give evidence in criminal or disciplinary proceedings, Storm will arrange for the reporting party to receive expert or legal advice, as appropriate, about the procedure.

In determining what further actions to take, considerations include, but are not limited to, the alleged wrongdoer, seriousness and credibility of the allegation, and the urgency of an investigation and resolution.

#### **E. Confidentiality**

Any investigation subsequently undertaken will be done in a serious and thorough manner and all information disclosed during the course of an investigation will remain confidential, except as necessary to conduct the investigation. The investigating body will respect the confidentiality of any complainant who so

requests, but can only do so to the extent permitted by the law. However, it must be appreciated that it will be easier to follow up and verify complaints if the complainant is prepared to divulge his or her name.

#### **F. Victimization, Discrimination and Harassment**

Any reporting party that reports a violation, complaint or concern in good faith and with absence of malice, will not be the subject of retaliatory actions against them. If you believe that you have been subject to any discrimination, retaliation or harassment as a result of this reporting process, this should be brought up immediately with a senior officer of Storm or the Chairman of the Audit Committee.

#### **G. False, Malicious and Bad Faith Reports**

The sensitive nature of corporate and professional reputation demands that Storm view very seriously any report that proves to be unsubstantiated or which proves to have been submitted knowing it to be false, or with malicious intent, or in bad faith. Storm regards the making of such reports as a serious disciplinary offence which may result in disciplinary action up to and including dismissal for cause.

#### **H. Records**

The Audit Committee shall retain for a period of three (3) years all records relating to reports submitted under this Policy.

Effective Date: May 18, 2011  
Amended May 2, 2014  
Amended October 26, 2016  
Amended April 19, 2018 (email address & 1-800#)  
Amended February 13, 2019 (mailing address)