

Lobbying

INTRODUCTION

This Policy provides detail regarding the obligations of Veren Inc. and its subsidiaries ("Veren" or the "Company") under federal, provincial and state legislation governing lobbying activities (collectively, "Lobbying Legislation") and is applicable to all directors, officers and employees of Veren.

Generally speaking, Lobbying Legislation is intended to enhance the integrity and accountability of government by fostering openness and transparency about who is seeking to influence decisions made by Public Office Holders (as defined herein). One of the ways Lobbying Legislation accomplishes this goal is by requiring all individuals who are paid, and employees whose work includes Lobbying (as defined herein) functions, to register their Lobbying activities.

The following summary describes the requirements applicable to Lobbying in Saskatchewan and Alberta. As the Lobbying Legislation varies between jurisdictions, if you are involved in Lobbying outside of Saskatchewan or Alberta, please contact the Company's Director, ESG & Stakeholder Engagement for details on the actions you must take to fully comply with the applicable Lobbying Legislation.

DEFINITIONS

"Consultant Lobbyist": an individual who, for payment, undertakes to Lobby on behalf of a person, partnership or organization, and includes an individual engaged by a Consultant Lobbyist to Lobby in respect of an undertaking.

"Designated Filer": the most senior officer of the organization who receives payment for performing his or her functions. Veren's Designated Filer is the Company's President and Chief Executive Office.

"In-house Lobbyist": In Saskatchewan, an employee, officer or director of an organization who is paid for performing his or her functions and whose Lobbying activity on behalf of the organization or an affiliate of the organization participates, alone or cumulatively, for at least 100 hours annually of Lobbying activities.

"Lobby, Lobbying or Lobbied": communicating with a Public Office Holder in an attempt to influence legislation, programs or policies, grants, contracts, financial benefits, or the provision of services and goods and to arrange meetings between Public Office Holders and other individuals either generally or for the purposes of attempting to influence the above-noted matters.

"Organization Lobbyist": In Alberta, an employee, officer or director of an organization who receives payment for the performance of his or her functions and whose Lobbying activity on behalf of the organization or an affiliate of the organization participates, alone or cumulatively, for at least 50 hours annually of Lobbying activities.

"Public Office Holder": includes members of the Executive Council and their staff, members of the Legislative Assembly and their staff, ministry employees, persons appointed by the Lieutenant Governor in Council or by a member of the Executive Council, public officers, and employees, officers, directors, or members of government institutions.

"Returns": information that is required to be filed according to the Lobbying Legislation.

"Undertaking": is entered into when a consultant Lobbyist acts on behalf of a client.

POLICY

Veren's executives and employees may be considered an In-house Lobbyist or Organization Lobbyist, as the case may be, to the extent that they communicate with Public Office Holders in an attempt to influence legislation, programs or policies, grants, contracts, financial benefits, or the provision of goods and services, or to arrange meetings between a ministry and/or the Premier of Saskatchewan or Alberta, as the case may be, and other Public Officer Holders relating to the foregoing matters. The main distinction between the Legislative requirements in Saskatchewan and Alberta are largely identical, except in Saskatchewan executives and employees may be considered an In-house Lobbyist if they Lobby for at least 100 hours annually (individually or collectively) whereas, in Alberta where executives and employees may be considered an Organization Lobbyist if they Lobby for 50 hours annually (individually or collectively).

Designated Filer Responsibilities

Veren's Designated Filer is required to file Returns within 60 days of an individual in the Company becoming an In-house Lobbyist or Organization Lobbyist, as applicable, and within 30 days after the end of each six-month period.

Returns are required to be in the designated form and contain the following information which includes, but is not limited to, the following:

- name and business address of the Designated Filer, and that he or she is the Designated Filer for an In-house Lobbyist/Organization Lobbyist;
- name of each In-house Lobbyist/Organization Lobbyist;
- subject matter and details of the Lobbying activities;
- departments or agencies lobbied and the name of the Public Office Holder lobbied;
- source and amount of any government funding; and
- communication techniques used, including grassroots communications (appeals to the public through mass media such as newspaper advertisements, petitions, Facebook or Twitter, or direct communications to encourage members of the public to communicate directly with public office holders to influence a particular decision).

In addition to filing Returns, the Designated Filer is required to supply the following additional information to the registrar, within 30 days:

- any changes to the Return;
- new information regarding Lobbying activities acquired after the Return was filed;
- information requested by the registrar to clarify any information supplied; and
- if and when a registered individual ceases to be a Lobbyist for the Company.

Lobbyist Responsibilities

All individuals that conduct activities for Veren that may be conceived as Lobbying, must enter the following information into the comments section, under the Time Entry option in Workday, within 24 hours of conducting a Lobbying activity:

- amount of time spent Lobbying (to the nearest 15 minutes);
- day on which the Lobbying took place;
- particulars of the subject matter concerning which the Lobbyist has Lobbied or expects to Lobby (OR) particulars of any relevant legislative proposal, bill, resolution, regulation, order in council, program, policy, directive, guideline, decision, grant, financial benefit or contract that is or will be the subject of the Lobbying;
- name of any ministry or government institution a Lobbyist has Lobbied or expects to Lobby;
- name of any member of the Legislative Assembly (MLAs) the Lobbyist has Lobbied or expects to lobby (including the name of any staff of the MLA);

- name of any minister of the Crown a Lobbyist has Lobbied or expects to Lobby; and
- source and amount of any government funding, if applicable.

Within 30 days of entering the above information in Workday, the individual will be contacted by the Director, ESG & Stakeholder Relations to formally register as an In-house Lobbyist/Organization Lobbyist.

GENERAL

Failure to comply with the applicable Lobbying Legislation can lead to administrative penalties or other significant fines, sanctions, publication of offences or sanctions and other possible penalties and punishments.

Any Director, Officer or employee found to have violated this Policy may be subject to disciplinary action, up to and including termination of employment.