

Respectful Workplace Policy

1 ROLE AND OBJECTIVES

Veren Inc. and its subsidiaries and affiliates (collectively, the “**Company**”) are committed to providing and maintaining a psychologically healthy and safe workplace that is free of harassment and violence. Workplace harassment, and workplace violence of any form will not be tolerated from any person in the workplace. The Company's commitment to a workplace free of harassment and violence will be reflected at every level. Likewise, the Company will not tolerate harassing or violent behaviour against a customer, contractor, consultant or visitor by any Worker (as defined herein).

This Respectful Workplace Policy (“**Policy**”) applies to all directors, officers, employees, contractors and consultants (collectively, “**Worker**”) who attend the Company's premises, and all other locations where activities are conducted, including while conducting Company business, at Company functions or social events.

All Workers are entitled to a workplace that is free from harassment and violence. Everyone is expected to treat one another in a respectful way, and the Company is committed to eliminating or controlling the hazards of workplace harassment and violence.

In support of this Policy, the Company has put in place workplace harassment and violence prevention procedures. It includes measures and procedures to protect Workers from the hazard of harassment, and violence, and a process for Workers to report incidents or raise concerns. It is everyone's responsibility to prevent and report such behaviours in the workplace.

2 DEFINITIONS

For the purpose of this Policy, the following words and terms shall have the following meanings:

“workplace harassment” means any single incident or repeated incidents of objectionable or unwelcome conduct, bullying or action by a person that the person knows or ought reasonably to know will or would cause offence or humiliation to a Worker, or adversely affects the Worker's health and safety, and includes, but is not limited to:

- conduct, comment, bullying or action that is humiliating, demeaning, intimidating or belittling, including workplace sexual harassment;
- conduct, comment, bullying or action because of race, or perceived race, religious beliefs, creed, colour, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status (including pregnancy), gender, gender identity, gender expression and sexual orientation, and any other protected characteristic under the *Alberta Human Rights Act*, and
- sexual solicitation or advance.

Some examples of what may be considered workplace harassment, depending on the facts and the circumstances, include:

- verbal or physical abuse, threats, derogatory remarks, jokes, innuendo, or taunts related to race, religious beliefs, colour, gender, gender identity, gender expression, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status or sexual orientation;
- displays of pornographic, racist or otherwise offensive signs or images, offensive jokes based on race or other grounds protected under the *Alberta Human Rights Act* that result in awkwardness or embarrassment, and unwelcome invitations or requests, whether implicit or explicit;
- engaging in vexatious comments or conduct because of sex, sexual orientation, gender identity or gender expression, where the comment or conduct is known or ought reasonably to be known to be unwelcome; and
- unwelcome sexual conduct, whether verbal or physical, including among other things, sexual advances, demands for sexual favors, making a sexual solicitation where the person making the solicitation is in a position of power, or other verbal or physical conduct of a sexual nature, whether or not it was designed or intended to promote an intimate relationship.

Reasonable actions taken by the Company, supervisor or manager while managing and directing Workers are not considered workplace harassment. Reasonable actions considered to be part of a manager's or supervisor's work functions such as changing work assignments, scheduling, assessing and evaluating work performance, inspecting workplaces, implementing health and safety measures, and taking disciplinary action such as dismissing, suspending, demoting or reprimanding with just cause when done reasonably and fairly are not considered workplace harassment.

Differences of opinion or minor disagreements between co-workers are also not generally considered to be workplace harassment but can turn into workplace harassment if no steps are taken to resolve the conflict. Similarly, difficult conditions of employment such as professional practice limitations, organizational changes or financial restrictions are not considered workplace harassment. Work-related stress, on its own, does not constitute workplace harassment. However, an accumulation of stress factors resulted from workplace harassment may result in a workplace harassment situation.

"**workplace violence**" means the threatened, attempted or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm and includes threatening behaviour, verbal or written threats (including online threats), domestic or sexual violence.

3 MANDATE AND RESPONSIBILITIES

As an employer, the Company is responsible for ensuring, as far as it is reasonably practicable, that none of its Workers are subject to or participate in workplace harassment or workplace violence. The Company will assess, and reassess as necessary, the risks of workplace harassment and workplace violence that may arise from the nature of the workplace. The Company will take all reasonable measures and procedures to control the risks of workplace harassment and workplace violence identified in any risk assessment or reassessment. The Company is also responsible for conducting training to educate Workers about this Policy, including the responsibility to report any violations of this Policy.

Workers shall refrain from causing or participating in workplace harassment or workplace violence, and are responsible for helping to enforce this Policy.

Supervisors or managers are expected to, as far as reasonably practicable, ensure that no Workers are subjected to or participate in workplace harassment or workplace violence, that this Policy is followed by all Workers, and that Workers have the information they need in order to protect themselves from workplace harassment and workplace violence.

Where a manager or supervisor determines that there is a risk of workplace harassment or workplace violence, the manager or supervisor must immediately notify the Senior Vice President, Finance and Treasurer of the Company (the "SVP Finance").

4 REPORTING WORKPLACE HARASSMENT

Workers must report all incidents of workplace harassment.

Workers experiencing workplace harassment should immediately make their feelings known to the offender and should advise the offender, directly or with the assistance of a third party, that their conduct is offensive. Workers should carefully document the details of the incident, including date and time, nature of the workplace harassment, and names of anyone who may have witnessed the workplace harassment.

Workers that are not comfortable confronting the offending party, or if the offending party's behaviour continues, or Workers who witness workplace harassment should immediately notify their supervisor or manager, or the SVP Finance. Any manager or supervisor who is notified of any complaint of workplace harassment, or is aware of any situation that may constitute workplace harassment, must immediately notify the SVP Finance.

5 REPORTING WORKPLACE VIOLENCE

Workers who are subjected to or witness an incident of workplace violence must immediately report the incident to their supervisor or manager, or the SVP Finance. Any supervisor or manager who is notified of any complaint of workplace violence, or is aware of any situation that may constitute workplace violence, must notify the SVP Finance. Workers should not intervene in an incident of workplace violence by taking any action that might endanger themselves or any other persons.

Any person who has been the subject of, or is in imminent danger of workplace violence should immediately call 9-1-1.

6 ANONYMOUS REPORTING WORKPLACE HARASSMENT AND WORKPLACE VIOLENCE

If a Worker is uncomfortable addressing their concerns to their manager or supervisor, or the SVP Finance, the whistleblower hotline can be contacted anonymously by way of telephone at 1-855-484-CARE (2273) or online at GrantThorntonCARE.ca (enter "Veren" in the company field). Please see the Company's *Whistleblowing Policy* for further information.

7 INVESTIGATING WORKPLACE HARASSMENT AND WORKPLACE VIOLENCE

The Company will investigate all reports of workplace harassment and workplace violence fairly, promptly and thoroughly, while respecting the privacy of Workers as much as possible.

How an investigation into alleged workplace harassment or workplace violence is structured will depend on the nature of the alleged offence, and in certain cases, the parties involved. Some investigations will be conducted internally by the Company, while in other cases, the Company may engage the services of an outside third party investigator. Investigations will involve:

- information gathering (including speaking with the parties involved and any witnesses, if applicable);

- where appropriate and practicable, allowing the alleged offender to respond to the allegations, furnish relevant information or evidence and put forward names of witnesses that the alleged offender believes will have relevant information;
- arriving at a conclusion regarding whether this Policy was breached;
- resolving the matter in a manner that is acceptable to both parties, to the extent practicable;
- making a record of the outcome of the investigation; and
- reporting to the person designated by the Company to receive such reports.

8 CONSEQUENCES

If an investigation confirms that workplace harassment, workplace violence or other improper behaviour has occurred, the Company will take prompt corrective action to resolve the situation. This may include discipline up to and including immediate termination of employment for just cause.

The Company will also take disciplinary action up to and including immediate termination of employment for just cause against anyone who fails to report an incident or threat of workplace harassment or workplace violence contrary to this Policy, or anyone who makes a false allegation in bad faith.

In cases where an incident of workplace violence is reported, the Company will prepare a written report documenting the violent incident and stipulating corrective action to prevent a recurrence. The report will be retained for inspection by an Occupational Health and Safety Officer.

When necessary, or advisable, law enforcement will be contacted.

9 NO RETALIATION OR DISCRIMINATION

Retaliation and/or discrimination against anyone who is the victim of workplace harassment or workplace violence, or anyone who makes a complaint of workplace harassment or workplace violence based upon an honest perception of events or for cooperating in the investigation of a complaint will not be tolerated under any circumstances.

10 PRIVACY AND CONFIDENTIALITY

The Company will not disclose information obtained about an incident or complaint of workplace violence or workplace harassment, including identifying information about any individuals involved, unless the disclosure is necessary for the purposes of investigating or taking corrective action with respect to the incident or complaint, or as otherwise required by law.

11 OPTIONS

Nothing in this Policy is intended to prevent or discourage a Worker from exercising any other legal avenues that may be available to the Worker, including, where appropriate, contacting the appropriate authorities, such as the appropriate Human Rights authority.

12 OTHER RESOURCES

The Company also supports a free and confidential Employee and Family Assistance Program (“**EFAP**”). It is in place to assist the Company’s employees their dependents with managing your personal and work lives. The program has a number of resources, including: counselling, research support and other resources

(toolkits, articles, podcast series, etc.). More information on the EFAP can be found on the Company's intranet site.

13 ANNUAL CERTIFICATION

To demonstrate our determination and commitment to ensuring a psychologically safe and healthy workplace, and to monitor compliance with the Policy, all Workers will be required annually to certify that they have read and understood the Policy and complied with the terms of the Policy.