

Whistleblower Policy

Staff are encouraged to report all types of inappropriate activity, examples of which may include but are not limited to:

- questionable accounting, internal accounting controls, or auditing matters ("Accounting/Audit Matters Concerns");
- suspicions of fraudulent financial information or the reporting of fraudulent information;
- conduct which results in a violation of law by Vermilion or in a substantial mismanagement of the company's resources and if proven constitutes a criminal offence or reasonable grounds for dismissal of the person engaging in such conduct ("Grave Misconduct");
- any discrimination, retaliation or harassment against any person who reports incidents of Accounting/Auditing Matters Concerns, fraudulent financial information or Grave Misconduct, or who participates in an investigation of complaints about these concerns; or
- any single or repeated incidents of objectionable or unwelcome conduct, comment(s), bullying, discrimination, harassment or action(s) by a person in the workplace that appears to, or reasonably would be expected to, cause offence or humiliation or may affect another worker's health and safety.

Vermilion provides, through an independent third-party legal firm, a secure website that allows employees to report all types of inappropriate activity directly to Vermilion's Corporate Secretary by sending an anonymous e-mail to the Corporate Secretary in accordance with Section 2.3 of the Employee Handbook. This website's use cannot be tracked, accessed or otherwise reviewed by Vermilion staff. Reports of inappropriate activity will be promptly and thoroughly investigated in accordance with the company's investigation procedures.

To make a report, contact our Corporate Secretary by [email](#) or phone 403.267.9405.