

Whistleblower Policy

Grant Thornton CARE provides a confidential, accessible tool for anyone wanting to report a concern, or ask a question. You can make an anonymous report 24 hours a day, 7 days a week. All reports will be promptly and thoroughly investigated in accordance with Vermilion's Code of Business Conduct and Ethics.

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

1. Questionable accounting, internal accounting controls, or auditing matters ("Accounting/Audit Matters Concerns");
2. Suspicions of fraudulent financial information or the reporting of fraudulent information;
3. Conduct that 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");
4. 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
5. 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.

To Make a Report

The CARE program offers four ways to report:

1. Website: Select "**Start your report online**"
2. Dial toll-free – available 24/7: **1-855-484-CARE (2273)** or **0011 800 4484 2273** for Australia
3. Anonymous Email – available 24/7: useCARE@ca.gt.com
4. Anonymous P.O. Box:
CARE Program
c/o Grant Thornton
200 King Street West, Box 11
Toronto, ON M5H 3T4

When reporting through the website or toll-free number, you will be provided with a secure report ID and password, which allows you to add attachments, provide more detail, and anonymously chat with a Vermilion representative. To access your report, click on the "Follow-up on your Report" link on the CARE home page and enter your ID report and password.