

External Privacy Policy

At Vermilion Energy (“**Vermilion**”), we are committed to maintaining the confidentiality, security, and accuracy of your Personal Information (as defined below). This External Privacy Policy (the “**Policy**”) describes the Personal Information that Vermilion collects from or about you, how we use and to whom we disclose that information.

This Policy is the global standard for Personal Information handling for all our Business Units or subsidiaries of Vermilion. Vermilion will comply with local legal requirements where they differ from this standard. In other jurisdictions with lesser or no legal requirements in relation to Personal Information, Vermilion will continue to apply this standard, as possible, to ensure consistency of its global operations.

Vermilion has adopted a series of privacy policies in order to address the specific privacy concerns of certain groupings of individuals and specific issues relating to the use of our website and all associated systems and processes. This Policy applies to the Personal Information of all individuals, unless the Personal Information:

- is related to a potential, current or former employee of Vermilion. Employee personal information is dealt with in the Vermilion "*Personal Information Privacy*" policy; or
- is collected, used or disclosed while using the Vermilion website. This personal information is dealt with in Vermilion’s "*Website Privacy Statement*".

If you are unsure of which privacy policy applies to you, please contact our privacy officer at privacy.officer@vermilionenergy.com

Global Standard for Personal Information Handling

Vermilion will comply with the privacy legislation within each jurisdiction in which we operate. Sometimes the privacy legislation and/or an individual's right to privacy are different from one jurisdiction to another. Vermilion will maintain this standard, where possible given local legal requirements, to maintain consistency in its global operations with respect to the collection, use/processing and disclosure of Personal Information.

Different local legal requirements may mean that the rights and obligations contained in this Policy may not be available to all individuals or in all jurisdictions. If you are unsure if or how this Policy applies to you, please contact our privacy officer at privacy.officer@vermilionenergy.com for more information.

What is Personal Information?

For the purposes of this Policy, “Personal Information” is any information about an identifiable individual.

What Personal Information do we Collect?

We collect and maintain different types of Personal Information in respect of individuals with whom we interact. This includes:

- contact and identification information that you provide to us, such as your name, address, telephone number and e-mail address;
- correspondence and other communications (for example, if you contact us by telephone, letter or email, we will typically keep a record of that correspondence or communication);
- credit and financial information such as your payment methods and preferences, and billing and credit history;

- relationship information, including information related to your agreements, preferences, advisors and decision-makers, service requests and feed-back and information requested or provided by or from you; and
- information that you provide via job applications or interviews, including resume/CV, employment and educational background, job qualifications, references, background checks and pre-employment test results (where appropriate and subject to legal jurisdictions). We also receive personal information from other sources, such as third party recruitment sources and service providers.

We may also collect market-related information, which may include Personal Information concerning market trends and activities impacting our business. This information may include contract terms, financial information and other information for the purpose of market analysis and strategic planning. We may also collect information related to our media, investor and public relations activities and information related to our interactions with financial and other analysts and advisors.

In some cases, you may provide personal data to us about other people (for example, the name and contact information for individuals being used as a reference during the recruiting process). You must ensure that you have given those individuals an appropriate notice that you are providing their information to us and have obtained their consent to that disclosure.

In the course of conducting its business, Vermilion may monitor the activities of individuals in respect of its operations and its property. For example, some Vermilion locations are equipped with security cameras. These cameras are generally in high risk areas or certain work sites. Where in use, security cameras are there for the protection of employees and third parties, and to protect against theft, vandalism and damage to Vermilion goods and property. Generally, video tapes recording images are routinely destroyed and not shared with third parties unless there is suspicion of a crime, in which case they may be turned over to the police or other appropriate government agency or authority.

As a general rule, Vermilion collects Personal Information directly from you. In most circumstances where the Personal Information that we collect about you is held by a third party, we will obtain your permission before we seek out this information from such sources (such permission may be given directly by you, or reasonably implied from your actions).

From time to time, we may utilize the services of third parties (including members from other Business Units of Vermilion) in our business and may also receive Personal Information collected by those third parties in the course of the performance of their services for us or otherwise. Where this is the case, we will take reasonable steps to ensure that such third parties have represented to us that they have the right to disclose your Personal Information to us.

Where permitted or required by applicable law or regulatory requirements, we may collect information about you without your consent.

Why Do We Collect Personal Information?

Vermilion collects Personal Information to enable us to manage and develop our business and operations, including:

- to respond to inquiries (including investment inquiries), when you contact us with an inquiry and provide information such as your name, telephone number and email address;
- to add you to our news alert distribution list, when you subscribe to receive news alerts via email;
- to be able to comply with your requests (for example, if you prefer to be contacted at a business or residential telephone number and advise us of your preference, we will use this information to contact you at that number);
- to establish, maintain and manage relations with you and others with whom Vermilion interacts, including customers, suppliers, contractors and other stakeholders;

- to engage in a business transaction, including a purchase, sale, lease, merger, amalgamation or another other type of acquisition disposal or securitization of financing involving us or a part of our business;
- to protect us against error, fraud, theft and damage to our goods and property;
- to enable us to undertake our health, safety and environment activities, including incident planning, response and investigation;
- to enable us to comply with applicable law or regulatory requirements; and
- any other reasonable purpose to which you consent.

How Do We Use and Disclose Your Personal Information?

We use and disclose your Personal Information:

- for the purposes described in this Policy; or
- for any additional purposes for which we have obtained your consent to the use or disclosure of your Personal Information (which consent may be express, deemed or implied, as explained below).

We may use or disclose your Personal Information without your knowledge or consent where we are permitted or required by applicable law or regulatory requirements to do so.

When Do We Disclose Your Personal Information?

We share your Personal Information with our employees, contractors, consultants and other parties (including members from other Business Units of Vermilion) who require such information to assist us with establishing, maintaining and managing our relationship with you, including: third parties that provide services to us or on our behalf; third parties that collaborate with Vermilion in the provision of services to you; and third parties whose services we use to perform our services.

Further, your Personal Information may be disclosed:

- as permitted or required by applicable law or regulatory requirements;
- to comply with valid legal processes such as search warrants, subpoenas or court orders;
- as part of Vermilion's regular reporting activities;
- to protect the rights and property of Vermilion;
- during emergency situations or where necessary to protect the safety of a person or group of persons;
- in the event of a change of control of Vermilion or some form of business combination, merger or joint venture;
- where the Personal Information is publicly available; or
- with your consent (for example, where you share details for particular purposes).

In addition, Personal Information may be disclosed or transferred to another party (including to a member of another Business Unit of Vermilion or an affiliate of Vermilion) during the course of or completion of a change in ownership of, or a grant of a security interest in, all or a part of Vermilion through, for an example, an asset or share sale, or some other form of business combination, merger or joint venture, provided that such party is bound by appropriate agreements or obligations and required to use or disclose your Personal Information in a manner consistent with the use and disclosure provisions of this Policy, unless you consent otherwise.

Your Consent is Important to Us

It is important to us that where we collect, use or disclose your Personal Information we have your consent to do so. Depending on the sensitivity of the Personal Information, your consent may be implied

or express. Express consent can be given orally, electronically or in writing. Implied consent is consent that can reasonably be inferred from your action or inaction. For example, when you share personal information within a particular request, we will assume your consent to the collection, use and disclosure of your Personal Information for purposes related to your request, or for other purposes identified to you at the relevant time.

Typically, we will seek your consent at the time that we collect the Personal Information. If we plan to use or disclose your Personal Information for a purpose not previously identified (either in this Policy or separately), we will endeavor to advise you of that purpose before such use or disclosure.

Withdrawal

You may change or withdraw your consent at any time, subject to legal or contractual restrictions and reasonable notice, by contacting our privacy officer at privacy.officer@vermillionenergy.com. In some circumstances, a change in or withdrawal of consent may severely limit our ability to provide products or services to, or acquire products or services from you. All communications with respect to such withdrawal or variation of consent should be in writing and addressed to privacy.officer@vermillionenergy.com.

How is Your Personal Information Protected?

Vermilion endeavors to maintain physical, technical and procedural safeguards that are appropriate to the sensitivity of the Personal Information in question. These safeguards are designed to prevent your Personal Information from loss and unauthorized access, copying, use, modification or disclosure.

From time to time, personal Information may be transferred by Vermilion to a third party internationally for reasonable purposes. When Vermilion transfers Personal Information in its possession, custody or control to a third party, it shall implement contractual or other means to provide a comparable level of protection for the Personal Information.

Updating Your Personal Information

It is important that the information contained in our records is both accurate and current. If your Personal Information happens to change during the course of our relationship, please keep us informed of such changes. In some circumstances we may update your Personal Information by including new text to the record.

Access to Your Personal Information

You can ask to see the Personal Information that we hold about you. If you want to review, verify or correct your Personal Information, please contact our privacy officer at privacy.officer@vermillionenergy.com. Please note that any such communication must be in writing.

When requesting access to your Personal Information, we may request specific information from you so we are able to confirm your identity and right to access, as well as to search for and provide you with the Personal Information that we hold about you. Vermilion will respond to access requests in accordance with applicable local timeframes for doing so. If you require assistance in preparing your request, please contact our privacy officer at privacy.officer@vermillionenergy.com.

Your right to access the Personal Information that we hold about you is not absolute. There are instances where applicable law or regulatory requirements allow or require us to refuse to provide some or all of the Personal Information that we hold about you. In addition, the Personal Information may have been destroyed, erased or made anonymous in accordance with our record retention obligations and practices.

In the event that we cannot provide you with access to your Personal Information, we will endeavor to inform you of the reasons why, subject to any legal or regulatory restrictions.

Inquiries

If you have any questions about this Policy or about how Vermilion manages your personal information, please contact our privacy officer at privacy.officer@vermilionenergy.com . Vermilion will endeavor to answer your questions and advise you of any steps taken to address the issues raised by you.

Revisions to this Policy

Vermilion may from time to time make changes to this Policy to reflect changes in its legal or regulatory obligations or in the manner in which we deal with your Personal Information. We will post any revised version of this Policy on our website, and we encourage you to refer back to it on a regular basis. Any changes to this Policy will be effective from the time they are posted, provided that any change that relates to why we collect, use or disclose your Personal Information will not apply to you unless you consent to such change.

Interpretation of this Policy

Any interpretation associated with this Policy will be made by your local privacy officer. This Policy includes examples but is not intended to be restricted in its application to such examples, therefore where the word 'including' is used, it shall mean 'including without limitation'.

This Policy does not create or confer upon any individual any rights, or impose upon Vermilion any rights or obligations outside of, or in addition to, any rights or obligations imposed by the federal and local privacy laws, as applicable, of the country in which you work or other laws as may be applicable. Should there be, in a specific case, any inconsistency between this Policy and the federal and local privacy laws, as applicable, of the country in which you work or other laws as may be applicable this Policy shall be interpreted, in respect of that case, to give effect to, and comply with, such privacy laws.