

FORZA PETROLEUM WHISTLEBLOWER POLICY

JANUARY 2021



WHISTLEBLOWER POLICY

1. SCOPE

This is the policy regarding whistleblowing within Forza Petroleum Limited (the “**Corporation**”) and its subsidiaries (together, the “**Forza Petroleum Group**”) worldwide.

2. PURPOSE

The Forza Petroleum Group is committed to the highest possible standards of ethical, moral and legal business conduct, as set out in detail in our Code of Conduct. In line with this commitment, and the Forza Petroleum Group’s general commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith.

3. SAFEGUARDS

Discrimination, Harassment or Victimization

Any form of discrimination, harassment or victimization of a person that makes a complaint or raises an issue (“complainant”) will not be tolerated. Offenders will be subject to disciplinary and/or legal action.

Confidentiality

The Forza Petroleum Group will respect the confidentiality of any complaint received, and every effort will be made to protect the complainant’s identity. However, confidentiality cannot be maintained if such confidentiality is incompatible with a fair investigation or if there is an overriding reason for identifying or otherwise disclosing the identity of the person making the complaint, or if disclosure of the identity of the complainant is required by law.

Malicious Allegations

Deliberately false and malicious allegations will be regarded as a serious disciplinary offence and may result in disciplinary action against the complainant.

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4. PROCEDURE

4.1 Reporting

The Forza Petroleum Group has established an Ethics Committee composed of the Chief Executive Officer, the General Counsel and Corporate Secretary, the Head of Human Resources and the Senior Internal Auditor. The role of the Ethics Committee is to receive and examine all complaints made under this Policy or which are otherwise referred to the Ethics Committee, to coordinate the necessary response, and to regularly advise the Audit Committee of such complaints and actions.

Accordingly, reports or complaints under this Whistleblower Policy should be communicated through the following channels:

- (a) to any member of the Forza Petroleum Group's Ethics Committee, composed of the Chief Executive Officer (CEO), the General Counsel and Corporate Secretary, the Head of Human Resources (HHR) and the Senior Internal Auditor, either:
 - (i) individually to one of the Ethics Committee members; or
 - (ii) collectively to all members of the Ethics Committee using the email address ethics@forzapetroleum.com; or
- (b) to the Chair of the Audit Committee directly.

Where the complaint involves a member of the Ethics Committee, then the complainant may directly confer with one of the other members of the Ethics Committee, and that Ethics Committee member must provide a report and recommendation directly to the Chair of the Audit Committee, without involving the other members of the Ethics Committee.

4.2 Time for Making a Complaint

Complaints and reports should preferably be made within a reasonable time from the date of the incident, as timely reporting is essential to ensure a more accurate and complete investigation.

The earlier a concern is expressed, the easier it is to take action. However there is no fixed time limit on when a complaint may be made.

4.3 Evidence

Although the employee is not expected to prove the truth of an allegation, the employee needs to demonstrate to the person contacted that there are sufficient grounds for concern.

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4.4 How the Complaint Will Be Handled

The action taken will depend on the nature of the concern. The Ethics Committee shall report each complaint received by it to the Audit Committee, normally through its Chair, as soon as practicable and, in any event, no later than 3 days from receipt, along with its proposed course of enquiry/investigation for endorsement by the Audit Committee before it is commenced.

In particular the Ethics Committee and the Audit Committee through its Chair should consider and determine whether any inquiries and investigation should be led entirely internally, or whether external leadership or support is appropriate in each circumstance.

The Audit Committee should be kept informed of progress in relation of any investigation and ultimately should receive a follow-up report on conclusions reached and actions taken.

4.5 Initial Inquiries

Initial inquiries will be made to determine whether an investigation is appropriate, and the form that it should take. Some concerns may be resolved by agreed action without the need for significant further investigation.

4.6 Report to Complainants

Whether reported directly to the relevant personnel or the Ethics Committee or the Chair of the Audit Committee, the complainants will receive acknowledgement that the concern was logged within two days. The complainants will be given the opportunity to receive follow-up on their concern as soon as practicable and, in any event, within ten days:

- (a) indicating how the matter will be dealt with;
- (b) giving an estimate of the time that it will take for a final response;
- (c) telling them whether initial inquiries have been made;
- (d) telling them whether further investigations will follow, and if not, why not.

4.7 Further Information

The nature and extent of contact between the complainant and the body investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the complainant.

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4.8 Information

Subject to legal constraints the complainant will receive appropriate information about the outcome of any investigations.

The Forza Petroleum Group reserves the right to modify or amend this policy at any time as it may deem necessary.

Approved by the management team of Forza Petroleum Limited on 27 April 2015.