



Whistleblower Policy

The purpose of this Whistleblower Policy is to provide direction to all employees and non-employees of Westbrick Energy Ltd. (“Westbrick”), regarding the communication of events/occurrences or concerns, with respect to issues of integrity and honesty in financial or operational matters.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Westbrick can address and correct inappropriate conduct and actions. It is the responsibility of all employees and non-employees to report concerns about violations of Westbrick’s code of ethics or suspected violations of law or regulations that govern Westbrick’s operations.

DEFINITION – REASONABLE GROUNDS OF A “WHISTLEBLOWER EVENT”

For the purposes of this Policy and as defined by Federal and Provincial legislation, a Whistleblower event is triggered if any one of the following incidents occur:

- a) A contravention of any Act of Parliament or of the legislature of a Province;
- b) A misuse of funds or assets;
- c) A gross mismanagement or omission or neglect of duty;
- d) An abuse of authority;
- e) An act or omission that creates a substantial and specific danger to the life, health or safety of persons, or to the environment;
- f) A serious breach of Westbrick Energy Code of Conduct;
- g) Breach of fiduciary duty and/or abuse of trust;
- h) Inappropriate occurrences at a company event;
- i) Knowingly directing a person to commit a wrongdoing set out above; or
- j) Concealment of any of the above or any other breach of this policy.

No Retaliation

It is contrary to the values of Westbrick for anyone to retaliate against any employee or non-employee who in good faith reports an ethics violation, or a suspected violation of law, or suspected fraud, or suspected violation of any regulation governing the operations of Westbrick. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

Reporting Procedure

Westbrick has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their department vice president. If you are not comfortable speaking with your department vice president or you are not satisfied with your vice president’s response, you are encouraged to speak with Douglas Kay, Chairman of the Board of Directors. Vice presidents are required to report complaints or concerns about suspected ethical and legal violations in writing to



Douglas Kay, who has the responsibility to investigate all reported complaints and advise Westbrick's Board of Directors of all complaints and their resolution.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

Douglas Kay will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Douglas Kay
Chair of the Board of Directors
Phone: (403) 828-7538
E-mail: dkay@westbrick.ca