



RECONNAISSANCE ENERGY AFRICA LTD.

WORKPLACE BULLYING, HARASSMENT, DISCRIMINATION AND SEXUAL HARASSMENT POLICY

A. PURPOSE

Reconnaissance Energy Africa Ltd. (the “**Company**”) is committed to a work environment that is free of bullying, harassment, discrimination and sexual harassment, and one in which all individuals are treated with respect and dignity. This workplace bullying, harassment, discrimination and sexual harassment policy (the “**Policy**”) has been established to provide clear statement on:

- what does and what does not constitute bullying and harassment;
- what constitutes discrimination;
- what constitutes sexual harassment;
- roles and responsibilities of the Company and its directors, officers and employees;
- the process for reporting bullying, harassment, discrimination and sexual harassment; and
- the process for responding to and investigating reports of bullying, harassment, discrimination and sexual harassment.

B. SCOPE

This Policy applies to all directors, officers and employees of the Company and its subsidiaries, including permanent, temporary, or casual employees as well as independent contractors (all of whom are referred to as “**Employees**” in this Policy from time to time). This Policy applies wherever the Company’s business or work-related activities are conducted (including washrooms and lunchrooms), and includes work-related social functions, conferences and training, and work assignments outside of Company premises (collectively referred to as the “**Workplace**”). This Policy may also apply to conduct by Employees outside of the Workplace when one or more Employees are the target of bullying, harassment, discrimination or sexual harassment.

C. POLICY STATEMENT

Every Employee has the right to a Workplace that is free from bullying, harassment, discrimination and sexual harassment in any form. Bullying, harassment, discrimination and sexual harassment are unacceptable and will not be tolerated. The Company will make every reasonable effort to prevent and eliminate bullying, harassment, discrimination and sexual harassment in the Workplace, and to deal fairly and appropriately with any complaints it receives. The Company will treat all incidents seriously and promptly investigate all allegations of bullying, harassment, discrimination and sexual harassment. All complaints will be treated with respect and in confidence and no one will be victimized for making such a complaint.

Employees must:

- not engage in the bullying, harassment, discrimination or sexual harassment of other Employees;
- report if bullying, harassment, discrimination or sexual harassment is observed or experienced; and
- comply with the Company's policies and procedures on bullying, harassment, discrimination and sexual harassment.

Any Employee who engages in Workplace bullying, harassment, discrimination or sexual harassment will be subject to discipline, up to and including termination of employment or contract.

This Policy is not intended to discourage an Employee from exercising any rights they may have pursuant to any other law, including under the applicable human rights legislation.

D. BULLYING AND HARASSMENT

Bullying and harassment include:

- any inappropriate conduct or comment by a person towards an Employee that the person knew or reasonably ought to have known would cause that Employee to be offended, humiliated or intimidated or that adversely affects the Employee's health and safety, but
- exclude any reasonable action taken by an employer or supervisor relating to the management and direction of Employees or the place of employment.

Bullying and harassment are generally defined as conduct which has the purpose or effect of creating an intimidating, hostile or offensive work environment, unreasonably interfering with an individual's work performance, or adversely affecting an individual's opportunities in the workplace.

Workplace bullying and harassment include acts, physical contact or comments which can have the effect of mentally hurting or isolating a person in the Workplace. Workplace bullying and harassment usually consist of repeated incidents or a pattern of behaviour that is intended to intimidate, offend, belittle, or humiliate a particular person or group of people. Lack of intent

does not mean the conduct is not bullying and harassment if the bully ought to have known the behaviour would cause the victim to be offended, humiliated or intimidated or to adversely affect their health and safety. Bullying and harassment can also consist of a single traumatic incident.

Workplace bullying and harassment do not include the exercise of management rights to reorganize the Workplace, assign additional work, to hold Employees accountable for their performance through performance improvement or corrective action plans, and impose justifiable discipline. Also, not every instance of Workplace conflict or difference of opinion is bullying and harassment, nor is making a legitimate complaint about another's conduct through the Company's established procedures.

E. DISCRIMINATION

Discrimination on the basis of age, sex, colour, race, creed, citizenship, ancestry, place of origin, ethnic origin, religion, marital status, sexual orientation, gender identity, gender expression, disability, family status, source of income, political belief, record of offences that are unrelated to employment or intended employment, or any other condition or characteristic protected by law (each, a "**Prohibited Ground**") is strictly prohibited by the Company.

Discrimination exists where a person is not afforded equal treatment on the basis of a Prohibited Ground. The discrimination may be direct (e.g. denying people access to opportunities based on a Prohibited Ground) or systematic (e.g. denying someone an opportunity because of culturally biased testing). Discrimination may come from an individual or through systems and attitudes within institutions.

F. SEXUAL HARASSMENT

Sexual harassment means unwelcome sexual conduct, either visual, verbal, or physical, and may include, but is not limited to, unwanted sexual advances, unwanted touching and suggestive touching, language of a sexual nature, telling sexual jokes, innuendoes, suggestions, suggestive looks and displaying sexually suggestive visual materials. It includes situations where a person is asked to engage in sexual activity as a condition of that person's employment, as well as situations which create an environment that is hostile, intimidating or humiliating for the recipient. Sexual harassment can involve one or more incidents, and actions constituting sexual harassment may be physical, verbal, and non-verbal.

Sexual harassment is illegal, and all Employees are prohibited from engaging in any form of sexually harassing behavior.

G. BULLYING, HARASSMENT, DISCRIMINATION AND SEXUAL HARASSMENT REPORTING PROCEDURE

1. What to do if you Observe, or Believe you are the Victim of Bullying, Harassment, Discrimination or Sexual Harassment

Employees who feel they are being subject to bullying, harassment, discrimination or sexual harassment are encouraged to tell the individuals engaging in such conduct that his/her behaviour is unwelcome and ask him/her to stop. If it is difficult or inappropriate to approach the person responsible, or if the offender does not stop the behaviour, then Employees should report the incident(s).

Employees who become aware of situations where bullying, harassment, discrimination or sexual harassment may be occurring should report the suspected bullying, harassment, discrimination or sexual harassment to their immediate supervisor or manager, or if such person is alleged to have been involved in the bullying, harassment, discrimination or sexual harassment, to the Chief Compliance Officer.

2. How to Report Alleged and Suspected Bullying, Harassment, Discrimination and Sexual Harassment

Reports of alleged or suspected bullying, harassment, discrimination or sexual harassment may be made verbally or in writing. Provide as much information as possible in the report, including an account of the incident(s), where and when the incident(s) occurred, the persons involved and the names of witnesses, if any. Provide any other evidence or information that you may believe are relevant to the complaint, such as emails, handwritten notes, text messages and photographs.

Reports should be made to the Employee's immediate supervisor or manager. If the immediate supervisor or manager is alleged to be involved in the bullying, harassment, discrimination or sexual harassment, then reports can be made to the Chief Compliance Officer. If an Employee is uncertain as to whether an incident constitutes bullying, harassment, discrimination or sexual harassment, such Employee can anonymously email ethicshelp@reconafrica.com to report such incident and request advice as to the best course of action with regards to such incident.

3. Confidentiality

All complaints will be handled in a confidential manner. The Company will not disclose (a) information concerning a complaint, (b) the circumstances related to the alleged incident, (c) the names of the complainant, the person alleged to have committed the bullying, harassment, discrimination or sexual harassment, or any witnesses, or (c) any action taken as a result of the investigation, except where necessary to conduct a proper investigation, to take disciplinary measures, to inform the parties involved in the incident of the results of the investigation or any corrective action taken, or where required by law.

H. BULLYING, HARASSMENT, DISCRIMINATION AND SEXUAL HARASSMENT INVESTIGATION PROCEDURE

1. How and When Investigations will be Conducted

All complaints and reports of alleged bullying, harassment, discrimination and sexual harassment will be investigated. Most investigations will be conducted internally, however, in complex or sensitive situations, an external investigator may be hired. The investigation process will involve interviews of the complainant, the respondent and any witnesses named by either. If the complainant and the respondent agree on what happened in the incident, the Company will not investigate further and will determine what corrective action to take.

Investigations will be:

- undertaken promptly and diligently;

- focused on finding facts and evidence, including interviews of the complainant, respondent and any witnesses;
- sensitive to the interests of all parties involved; and
- fair and impartial.

2. Roles and Responsibilities

All Employees are expected to report suspected bullying, harassment, discrimination and sexual harassment and to cooperate with those responsible for investigating any complaints. The Company has a responsibility to prevent any bullying, harassment, discrimination and sexual harassment in the Workplace, therefore, if any supervisor or manager fails to report incidents of bullying, harassment, discrimination and sexual harassment, or fails to take appropriate corrective action, he or she will be subjected to disciplinary action, up to and including termination.

3. Follow-Up

The complainant and respondent will be advised of the results of the investigation and any corrective action, including discipline, to be taken to address the incident. The Company will keep a written record of investigations, including the findings.

Regardless of the outcome of any bullying, harassment, discrimination or sexual harassment complaint made in good faith, the Employee lodging a complaint or reporting suspected bullying, harassment, discrimination or sexual harassment, as well as anyone providing information regarding the complaint, will be protected from any form of retaliation by either co-workers or supervisors.

I. ANNUAL REVIEW

This Policy will be reviewed by the Company in accordance with applicable laws at least annually, or more frequently if required by applicable laws. All Employees will be provided with a copy of this Policy when they are hired and when amendments to this Policy are made.