

# RECONNAISSANCE ENERGY AFRICA LTD.

#### WHISTLE BLOWER POLICY

As part of its Corporate Governance practices, Reconnaissance Energy Africa Ltd. ("Reconnaissance" or the "Company") has a process called the **Whistle Blower Policy** that allows directors, officers, employees, and consultants throughout the organization to report any unethical or illegal activity without fear of reprisal from their fellow employees, supervisors, or other Company officials.

Whistleblowing is the disclosure of information that relates to suspected wrongdoing. This may include but are not limited to, criminal activities such as fraud, theft, breach of Company's code of conduct and policies and procedures, danger to health and safety, unauthorized disclosure of confidential information, accounting irregularities, bribery and the deliberate concealment of any of those matters.

A whistleblower is a person who raises a genuine concern in good faith relating to a suspected wrongdoing. If you have any genuine concerns related to reasonably suspected wrongdoing you should report it under this Policy. If you are uncertain whether something is within the scope of this Whistle Blower Policy you should seek advice from the Whistleblowing Officer whose contact details are at the end of this Whistle Blower Policy.

Reconnaissance's **Code of Business Conduct and Ethics** ("the Code") was given to you to ensure that you understand and agree with the Company's commitment to a culture of **honesty**, **integrity**, **and accountability**. The Code together with this Whistle Blower Policy are both available from the Secretary and the website of the Company.

The Code provides the guidelines for appropriate behavior and establishes the basis for open communication. It has been written and distributed to ensure that directors, officers, employees, and consultants acting in good faith have the means to report actual or potential violations.

If you observe or become aware of any actual or potential violation of the Code or any law or regulation, that you believe is not being properly addressed by your supervisor or management of the Company, it is your responsibility to report the circumstances to the Whistleblowing Officer or through the options outlined below. According to Reconnaissance Anti-Bribery Policy anyone who learns of possible bribery involving Reconnaissance must report his or her concerns immediately to <a href="mailto:ethicshelp@reconafrica.com">ethicshelp@reconafrica.com</a> or Chief Compliance Officer or the Compliance Manager or the line manager. It is this Whistleblowing Officer's responsibility to investigate any potential violation and report on the investigation

For anonymous reporting the **Whistleblower Hotline** is available, hosted by a third-party services provider, **EthicsPoint**. It's operated in partnership with NAVEX Global, an independent company which allows all of us to confidentially report concerns 24/7 either online (internet) or via toll-free telephone. **EthicsPoint** can also be accessed with the QR code provided below.

The following **EthicsPoint** options are available to contact the Whistleblower should you observe a violation of our Code of Business Conduct and Ethics or a law or regulation that you believe has not been properly complied with or correction action has not been taken.

The information you provide to **EthicsPoint** will be sent to us completely **confidential and on an anonymous basis** if you should choose.

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## Online:

Web Intake Site https://reconafrica.ethicspoint.com

## Mobile:

Mobile Intake Site https://reconafrica.navexone.com



#### Call Toll-free:

USA/Canada: 844-979-4932

**Botswana:** Reverse Charge / Collect Call: 678-459-6098 Namibia: Reverse Charge / Collect Call: 678-459-6099

Mexico: Dial 001-800-462-4240, 01-800 288-2872, 001-800-658-5454,

or 01-800-112-2020 (Por Cobrar), then dial 844-979-4932 **United Kingdom:** Dial 0-800-89-0011, then dial 844-979-4932

Failure to make a timely report may be grounds for disciplinary action, up to and including termination of employment or termination of service contract where applicable by ReconAfrica.

As per the Code's principles, there will be no reprisal against employees, officers, directors, or consultants for reporting violations. While all individuals are encouraged to identify themselves to facilitate a thorough and confidential investigation, you are not required to do so and you may make a report anonymously.

You are strongly encouraged to review the Code of Business Conduct and Ethics regularly. Please report any concerns which may arise through the options outlined above.

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