

RESPECTFUL WORKPLACE POLICY – USA

TABLE OF CONTENTS

1	OVERVIEW	2
1.1	PURPOSE	2
1.2	SCOPE	2
2	POLICIES	2
2.1	REFRAINING FROM HARASSMENT, DISCRIMINATION, VIOLENCE, AND INAPPROPRIATE BEHAVIOUR	2
2.2	HARASSMENT AND DISCRIMINATION	3
2.3	VIOLENCE	4
2.4	INAPPROPRIATE BEHAVIOUR	4
2.5	MANAGEMENT OR DIRECTION OF WORKERS	4
3	PROCEDURES	5
3.1	REPORTING POLICY VIOLATIONS	5
3.2	ANTI-RETALIATION	5
3.3	CONFIDENTIALITY OF HARASSMENT, DISCRIMINATION, RETALIATION AND VIOLENCE COMPLAINANTS	6
3.4	TRAINING	6
3.5	RESPONDING TO EMERGENCY SITUATIONS	6
4	RESPONSIBILITIES	7
4.1	WORKERS	7
4.2	LEADERS	7
4.3	POLICY OWNER	7
4.4	HUMAN RESOURCES DEPARTMENT	8
4.5	SUPPLY CHAIN MANAGEMENT DEPARTMENT	8
5	POLICY RIGHTS	8
6	COMPLIANCE	8
7	ADDITIONAL INFORMATION	8
7.1	DEFINITIONS	8
7.2	GOVERNING DOCUMENTS	8

1 OVERVIEW

1.1 PURPOSE

Gibson Energy Inc. and its subsidiaries ("Gibson" or the "Company") are committed to promoting and maintaining a Respectful Workplace. A "Respectful Workplace" is a Workplace that is free from Harassment, Discrimination, Retaliation, Violence, and Inappropriate Behaviour, and in which all persons are treated with dignity and respect.

The Respectful Workplace Policy (this "Policy") supports the Company's commitment and responsibility to provide a safe and healthy Workplace and recognizes that Workers and the Company have a shared responsibility in promoting and maintaining a Respectful Workplace. This Policy aligns with the Gibson Way core value of Work it Out & Do it Together.

1.2 SCOPE

This Policy applies to all Employees and Contingent Workers in the United States of America (collectively, the "Workers").

This Policy applies to conduct that occurs at the worksite and outside of the worksite while representing Gibson as a Worker or in a manner that impacts Gibson (collectively, the "Workplace"). Examples of the Workplace may include, but are not limited to:

- Work-related social functions;
- Communication by phone, email, on social media, instant messenger, and other electronic means; and
- Conferences or training sessions.

Applicable state and federal laws and local ordinances will be followed when applying this Policy.

2 POLICIES

2.1 REFRAINING FROM HARASSMENT, DISCRIMINATION, VIOLENCE, AND INAPPROPRIATE BEHAVIOUR

Gibson will make every reasonably practicable effort to ensure that no Worker is subjected to Harassment, Discrimination, Violence, or Inappropriate Behaviour in the Workplace.

Gibson and all Workers will work together to promote and maintain a Respectful Workplace. Accordingly, all Workers shall comply with this Policy by, among other things:

- Not engaging in Harassment, Discrimination, Violence, or Inappropriate Behaviour;
- Treating all persons, including all Workers, with dignity and respect; and
- Contributing to the promotion and maintenance of a Respectful Workplace.

Gibson will not tolerate any Harassment, Violence, Inappropriate Behaviour, or other conduct that is contrary to the promotion and maintenance of a Respectful Workplace.

2.2 HARASSMENT AND DISCRIMINATION

Harassment means any inappropriate conduct, comment, bullying, display, action or gesture that:

- Is based on a statutorily protected ground¹ under applicable state and federal law or local ordinance, including being of a sexual nature which the person engaging in the inappropriate activity knows or ought to reasonably know is unwelcome;
- Adversely affects a Worker's psychological or physical well-being and that the person engaging in the inappropriate activity knows or ought reasonably to know would cause a Worker to be humiliated or intimidated; or
- Constitutes a threat to the health or safety of a Worker.

Examples of Harassment include, but are not limited to:

- Written/verbal abuse.
- Derogatory remarks or gestures.
- Displays of pornographic or sexually suggestive, racist, offensive signs, images, or material.
- Workplace bullying, including isolating, persistently criticizing another, tampering with another's belongings or workstation, spreading rumours or gossip, excluding, cornering, or confining through body language or physical barriers and repeatedly and clearly assigning unreasonable duties or tasks.
- Unwelcome sexual flirtation, suggestive remarks, advances, compromising propositions or gestures.
- Unwelcome questions or discussions about sexual activities.
- Unwelcome comments, including compliments, jokes, nicknames or pet names, innuendos or taunting about a person's body, attire, sex, or sexual orientation, that result in offence.
- Leering or whistling.
- Unwelcome physical contact such as touching, hugging, patting, or pinching of a sexual nature
- A sexual advance, request for a sexual favour, or any other verbal or physical conduct of a sexual nature if:
 - submission to the advance, request, or conduct is made a term or condition of employment, either explicitly or implicitly;
 - submission to or rejection of the advance, request, or conduct is used as the basis for a decision affecting a Worker's employment;
 - the advance, request, or conduct has the purpose or effect of unreasonably interfering with a Worker's job performance; or
 - the advance, request, or conduct has the purpose or effect of creating an intimidating, hostile, or offensive working environment.

¹ The Texas Commission on Human Rights Act and Federal law currently include the following: race; color; disability; religion; sex, including pregnancy, childbirth, or a related medical condition; national origin; age with respect to persons 40 years of age or older; genetic information; sexual orientation; or gender identity. Some Texas cities include additional protected classes beyond those protected by federal law, such as veteran status, familial status, and marital status. Gibson will follow all state and federal laws and local ordinances.

RESPECTFUL WORKPLACE POLICY - USA

Behaviour that is acceptable to both parties involved would not be considered Harassment, but if one person indicates they no longer want the behaviour or relationship to continue, then any continued conduct may become Harassment.

Discrimination means treating someone differently, or less favorably, based on a statutorily protected ground under applicable state and federal law or local ordinance.

2.3 VIOLENCE

Violence is the threatened, attempted, or actual conduct of an individual, in the Workplace, that causes or is likely to cause physical or psychological injury or harm.

Examples of Violence include, but are not limited to:

- Physical attacks or aggression, such as pushing, slapping, punching, shaking of a fist, using a weapon, or aggressively throwing an item at a person.
- Verbal or written threats, and other aggressive behaviours that express an intent or have the potential to cause physical or psychological harm or injury.
- Sexual assault.

2.4 INAPPROPRIATE BEHAVIOUR

Inappropriate Behaviour means conduct that is disrespectful, unwanted or unprofessional or which constitutes unlawful discrimination. Differences of opinion or minor disagreements communicated in a respectful and professional manner are not considered to be Inappropriate Behaviour.

Examples of Inappropriate Behaviour include, but are not limited to:

- Insubordination.
- Demeaning or belittling comments or conversation.
- Yelling, raising one's voice, or angry outbursts.
- Escalating and/or prolonged arguments that continue after a party to the argument has expressed their desire for the argument to end.
- Hostile comments or exchanges.

2.5 MANAGEMENT OR DIRECTION OF WORKERS

Reasonable action taken by the Company or a Leader relating to the management and direction of Workers or a Workplace is not Harassment or Inappropriate Behaviour. Examples of reasonable action include, but are not limited to:

- Holding Workers accountable for their performance.
- Allocating work according to specific job-related requirements.
- Following-up on work absences.
- Enforcing workplace policies and procedures.
- Evaluating or measuring performance.
- Providing constructive feedback.
- Issuing justifiable progressive discipline.

3 PROCEDURES

3.1 REPORTING POLICY VIOLATIONS

A Worker who experiences or observes any incident of Harassment, Discrimination, or Violence must promptly report the incident to any of the following:

- A HR Business Partner;
- The GM/Director or VP Human Resources;
- The complainant's Leader;
- The respondent's Leader; or
- The EthicsLine at 1-888-4785-0595 <https://gibsonenergy.ethicspoint.com>.

The following measures may be implemented at any time within the sole discretion of Gibson, to be exercised reasonably and in keeping with the circumstances, including without limitation:

- Parties may be separated and/or reassigned;
- The reporting structure may be adjusted;
- Parties may be placed on a paid leave of absence; and
- Such other remedial or legal action deemed appropriate by Gibson.

Informal Resolution of Inappropriate Behaviour

Without limiting a Worker's ability to report any violation of this Policy or otherwise seek assistance, a Worker who experiences or observes Inappropriate Behaviour that the Worker does not believe amounts to Harassment or Violence is encouraged to first clearly and firmly inform the offending Worker that their conduct, comments, or actions are inappropriate and/or unwelcome.

Informal resolution strategies are not appropriate in instances where a Worker believes an incident of Harassment or Violence has occurred or where a Worker is not comfortable directly addressing the offending Worker. In such cases, the incident must be promptly reported in accordance with this Policy.

Documentation

Workers who experience or observe a potential Policy violation should make and maintain written record of the details of the incident and their involvement in it and should provide copies of that documentation in support of any complaint brought under this Policy.

Malicious Complaints

Workers must not make complaints under this Policy that are vexatious, untrue, malicious, or otherwise made in bad faith.

3.2 ANTI-RETALIATION

Gibson prohibits reprisals or threats of reprisal against any Worker who makes a complaint in good faith under this Policy or who in good faith takes part in an investigation under this Policy ("Retaliation"). A Worker who experiences or observes retaliation should report the retaliation pursuant to Section 3.1 of this policy.

3.3 CONFIDENTIALITY OF HARASSMENT, DISCRIMINATION, RETALIATION AND VIOLENCE COMPLAINANTS

Gibson will not disclose the circumstances of a Harassment, Discrimination, Retaliation, or Violence complaint, or the names of the parties involved in such complaint except:

- Where necessary to investigate the incident, to take corrective action, or to inform the parties involved in the incident of the results of the investigation and any corrective action to be taken to address the incident;
- Where necessary to inform Workers of a specific or general threat of Violence or potential Violence;
- As required by an applicable CBA; and/or
- As required by law.

Should Gibson have to disclose personal information to inform Workers of a specific or general threat of Violence or potential Violence, Gibson will disclose only the minimum amount of personal information that is necessary to achieve that end.

3.4 TRAINING

Gibson will provide Employees and Contingent Workers training in the:

- Recognition of Policy violations, including incidents of Harassment, Discrimination, Retaliation, or Violence;
- Policies, procedures and Workplace arrangements that Gibson has developed and implemented to eliminate or control the hazards of Harassment, Discrimination, Retaliation, and Violence;
- Appropriate responses to incidents of Harassment, Discrimination, Retaliation, Violence, and other Policy violations, including procedures for obtaining assistance; and
- Procedures for reporting, investigating, and documenting incidents of Harassment, Discrimination, Retaliation, or Violence.

All Employees and Contingent Workers have an obligation to review and keep up to date with this Policy, including with any revisions to the Policy that Gibson may implement from time to time.

3.5 RESPONDING TO EMERGENCY SITUATIONS

Violence is Imminent

If a Worker feels that Violence is imminent, the Worker should, as soon as safe to do so:

1. Call 911.
2. Contact site security, if applicable.
3. Report the incident to the Gibson 24-Hour Emergency Number 1-866-553-0111 for possible activation of emergency response protocols.

Aggressive or Escalating Behaviours

If an individual is displaying aggressive or escalating behaviours Workers should:

RESPECTFUL WORKPLACE POLICY - USA

1. Clearly and firmly make the individual(s) aware that their conduct, comments, bullying, or actions are unwelcome and must stop.
2. If the Worker is unsuccessful in stopping the behaviour or feels that they are unable to tell the individual(s) to stop, report the incident to a Leader.

If at any point a Worker feels the behaviour requires a higher level of intervention, the Worker should as soon as safe to do so:

1. Call 911.
2. Contact site security, if applicable.
3. Report the incident to the Gibson 24-Hour Emergency Number 1-866-553-0111 for possible activation of Emergency Response protocols.

Any employee who sustains an injury during an emergency situation should notify Human Resources as soon as it is safe to do so.

4 RESPONSIBILITIES

Without limiting the duties, requirements, and/or obligations otherwise set out in this Policy, the following stakeholders have a responsibility to comply with the following:

4.1 WORKERS

- Behave in a manner that promotes a Respectful Workplace.
- Comply with this Policy, including by refraining from engaging in Harassment, Violence, Retaliation, or Inappropriate Behaviour.
- Address and/or report all Respectful Workplace concerns promptly, including by reporting any incidents of Harassment, Discrimination, Violence, Retaliation, or Inappropriate Behaviour in a expeditious manner.
- Maintain a written record of the details of any potential Policy violation witnessed or experienced by the Worker.
- Complete required Respectful Workplace and other applicable training.
- Honestly and in good faith participate in investigations.

4.2 LEADERS

- Lead by example when complying with the Worker responsibilities.
- Cultivate a Respectful Workplace in which Harassment, Discrimination, Violence, Retaliation, or Inappropriate Behaviour are unlikely to occur.
- Ensure, as far as reasonably practicable, that Workers under their supervision are not subject to Harassment, Discrimination, Violence, Retaliation, or Inappropriate Behaviour.
- Take immediate, appropriate, and confidential action to manage or report Policy violations, whether brought to their attention or personally observed.
- Handle all Policy violation reports or incidents in accordance with this Policy.
- Seek assistance from HR when required or appropriate.

4.3 POLICY OWNER

- Own, develop, and manage this Policy.

RESPECTFUL WORKPLACE POLICY - USA

- Provide leadership and support in the promotion, application, training, and compliance of this Policy.

4.4 HUMAN RESOURCES DEPARTMENT

- Provide training in accordance with this Policy.
- Monitor compliance to this Policy.
- Provide ongoing consultation and expert advice as needed to Leaders and Workers.

4.5 SUPPLY CHAIN MANAGEMENT DEPARTMENT

- Provide all Contingent Workers with a copy of this Policy.

5 POLICY RIGHTS

Gibson maintains the exclusive right to amend, adjust or terminate this Policy at any time. Revisions or additions to the information contained in this Policy document will be made as required.

6 COMPLIANCE

Any violations of this Policy are serious and will result in corrective action being taken promptly and appropriately in the circumstances.

An Employee who is found to have violated this Policy may be subject to discipline, up to and including termination of at-will employment.

A Contingent Worker who is found to have violated this Policy may be subject to termination of contract and/or removed from the Workplace, as applicable.

7 ADDITIONAL INFORMATION

7.1 DEFINITIONS

PHRASE/WORD	DEFINITION
Contingent Worker	An Independent Contractor, Freelancer or a Temporary Staff who is a non-Employee that is paid through Gibson's Accounts Payable to either an agency or the individual's company. Further definitions and examples are located under Contingent Workforce Management on MyGibson.
Employee	A Gibson employee.
HR	Human Resources.
Leader	An individual who supervises other Workers. It includes all levels of management.

7.2 GOVERNING DOCUMENTS

N/A