

**SAVANNA ENERGY SERVICES CORP.
(THE “CORPORATION”)**

ANTI CORRUPTION POLICY

I. Introduction

This policy contains the relevant excerpts, applicable additions and is to be read in conjunction with the Code of Business Conduct and Ethics of the Corporation. We require the highest standards of professional and ethical conduct from our employees, consultants and those indirectly representing Savanna Energy Services Corp. (“Representatives”). Our reputation for honesty and integrity among our shareholders is key to the success of our business. No Representative will be permitted to achieve results through violations of laws or regulations, or through unscrupulous dealings.

We intend that the Corporation's business practices will be compatible with the economic and social priorities of each location in which we operate. Although customs vary from country to country and standards of ethics may vary in different business environments, honesty and integrity must always characterize our business activity.

This Anti Corruption Policy (the “Policy”) reflects our commitment to a culture of honesty, integrity and accountability and outlines the basic principles and policies with which all Representatives are expected to comply. Please read this Policy carefully.

In addition to following this Policy in all aspects of your business activities, you are expected to seek guidance in any case where there is a question about compliance with both the letter and spirit of our policies and applicable laws. This Policy sets forth general principles and does not supersede the specific policies and procedures that are covered in the specific policies statements, such as the [Code of Conduct, Confidentiality of Information, Representative Trading and Insider Trading and Reporting Policy]. References in this Policy mean Savanna Energy Services Corp. and any of its subsidiaries and affiliates.

Your cooperation is necessary to the continued success of our business and the cultivation and maintenance of our reputation as a good corporate citizen.

II. Conflicts of Interest

A conflict of interest occurs when an individual's private interest interferes, or appears to interfere, in any way with the interests of the Corporation. A conflict situation can arise when an Representative takes actions or has interests that may make it difficult to perform his or her work effectively. Conflicts of interest also arise when an Representative, officer or director, or a member of his or her family, receives improper personal benefits as a result of his or her position in the Corporation. Loans to, or guarantees of obligations of, such persons are likely to pose conflicts of interest, as are transactions of any kind between the Corporation and any other organization in which you or any member of your family have an interest.

Activities that could give rise to conflicts of interest are prohibited unless specifically approved in advance by the Board of Directors. It is not always easy to determine whether a conflict of interest exists, so any potential conflicts of interests must be reported immediately to senior management.

III. Corporate Opportunities

Representatives, officers and directors are prohibited from taking for themselves personally opportunities that arise through the use of corporate property, information or position and from using corporate property, information or position for personal gain. Representatives, officers and directors are also prohibited from competing with the Corporation.

IV. Confidentiality

Representatives must maintain the confidentiality of information entrusted to them by the Corporation or that otherwise comes into their possession in the course of their employment, except when disclosure is authorized or legally mandated. The obligation to preserve confidential information continues even after you leave the Corporation.

Confidential information includes all non-public information that may be of use to competitors, or harmful to the Corporation or its customers, if disclosed. It also includes information that suppliers and customers have entrusted to us.

V. Compliance with Laws, Rules and Regulations

Compliance with both the letter and spirit of all laws, rules and regulations applicable to our business is critical to our reputation and continued success. All Representatives must respect and obey the laws of the cities, provinces/states and countries in which we operate and avoid even the appearance of impropriety. Representatives who fail to comply with this Policy and applicable laws will be subject to disciplinary measures, up to and including discharge from the Corporation.

VI. Political Activities and Contributions

We respect and support the right of our Representatives to participate in political activities. However, these activities should not be conducted on Corporation time or involve the use of any Corporation resources. Representatives will not be reimbursed for personal political contributions.

We may occasionally express our views on local and national issues that affect our operations. In such cases, Corporation funds and resources may be used, but only when permitted by law and by our strict Corporation guidelines. The Corporation may also make limited contributions to political parties or candidates in jurisdictions where it is legal and customary to do so. The Corporation may pay related administrative and solicitation costs for political action committees formed in accordance with applicable laws and regulations. No Representative may make or commit to political contributions on behalf of the Corporation without the approval of the Chief Executive Officer.

VII. Gifts and Entertainment

Business gifts and entertainment are customary courtesies designed to build goodwill among business partners. These courtesies include such things as meals and beverages, tickets to sporting or cultural events, travel, accommodation and other merchandise or services. In some cultures they play an important role in business relationships. However, a problem may arise when such courtesies compromise – or appear to compromise – our ability to make objective and fair business decisions. The same rules apply to Representatives offering gifts and entertainment to our business associates.

Offering or receiving any gift, gratuity or entertainment that might be perceived to unfairly influence a business relationship should be avoided. These guidelines apply at all times, and do not change during traditional gift-giving seasons.

The value of gifts should be reasonable, both with respect to frequency and amount. Gifts that are repetitive may be perceived as an attempt to create an obligation to the giver and are therefore inappropriate. Likewise, business entertainment should be moderately scaled and intended only to facilitate business goals. Use good judgment. If you are having difficulty determining whether a specific gift or entertainment item lies within the bounds of acceptable business practice, ask yourself these guiding questions:

- It is legal?
- Is it clearly business related?
- Is it moderate, reasonable, and in good taste?
- Would public disclosure embarrass the Corporation?
- Is there any pressure to reciprocate or grant special favours?

Strict rules apply when we do business with governmental agencies and officials, whether in Canada or in other countries, as discussed in more detail below. Because of the sensitive nature of these relationships, talk with the Chief Executive Officer or the Chief Financial Officer before offering or making any gifts or hospitality to governmental Representatives.

VIII. Payments to Domestic and Foreign Officials

Representatives must comply with all laws prohibiting improper payments to domestic and foreign officials.

For example, in Canada, the *Corruption of Foreign Public Officials Act* (the “Act”) provides that every person commits an offence who, in order to obtain or retain an advantage in the course of business, directly or indirectly gives, offers or agrees to give or offer a loan, reward, advantage or benefit of any kind to a foreign public official or to any person for the benefit of a foreign public official as consideration for an act or omission by the official in connection with the performance of the official's duties or functions, or to induce the official to use his or her position to influence any acts or decisions of the foreign state or public international organization for which the official performs duties or functions.

Although certain types of “facilitation” payments may not be illegal, the Corporation's policy is to avoid such payments. If any Representative finds that adherence to the Corporation's policy would cause a substantial, adverse effect on operations, that fact should be reported to the Corporation's senior management which will determine whether an exception may lawfully be authorized. If the facilitating payment is made, such payment must be properly entered and identified on the books of the Corporation and all appropriate disclosures made.

Violation of this section of the Act is a criminal offence and every person who contravenes this section is guilty of an indictable offence and liable to imprisonment for a term not exceeding five years. If the violation results in any revenues or profits payable to the Corporation, those revenues or profits are subject to forfeiture to the Government.

Violation of this policy may result in disciplinary actions up to and including discharge from the Corporation.

IX. Reporting of any Illegal or Unethical behaviour

We have a strong commitment to conduct our business in a lawful and ethical manner. Representatives are encouraged to talk to supervisors, managers or other appropriate personnel when in doubt about the best course of action in a particular situation and to report violations of laws, rules, regulations or this Policy. We prohibit retaliatory action against any Representative who, in good faith, reports a possible violation. It is unacceptable to file a report knowing it to be false. To facilitate reporting of illegal or unethical behaviour, the Corporation has established a Whistle Blower Hotline where such behaviour can be reported anonymously by calling 403 503-1650 in Canada.

X. Compliance Procedures

This Policy cannot, and is not intended to, address all of the situations you may encounter. There will be occasions where you are confronted by circumstances not covered by policy or procedure and where you must make a judgment as to the appropriate course of action. In those circumstances we encourage you to use your common sense, and to contact George Chow, Executive Vice President, Corporate or Dwayne LaMontagne Executive Vice President and Chief Development Officer for guidance. Their contact numbers are (403) 267-6728 and (403) 214-5959, respectively.