



Insider Trading Policy

PURPOSE

Insider trading is a serious offence under applicable securities laws. Offenders may be liable to fines, imprisonment and civil liability for damages. Insider trading may also expose the Corporation to civil action by other participants in the equity markets and cause serious harm to the Corporation's reputation. The purpose of this Policy is to ensure that the Personnel are not only acting in accordance with the law at all times, but are seen to be doing so.

Insider trading laws are intended to provide information to the public with respect to the trading activities of selected individuals as well as to prevent persons who have access to non-public information from gaining an unfair advantage in the trading of securities or in providing a "tip" to someone else which provides them with an unfair trading advantage.

SCOPE

This insider trading policy (the "**Policy**") applies to all Personnel (as defined herein) of Savanna Energy Services Corp. (the "**Corporation**") and its Subsidiaries (as defined herein).

DEFINITIONS

Designated Officer means the Executive Vice President, Corporate of the Corporation, or, in the absence of the Executive Vice President, Corporate of the Corporation, the Chief Financial Officer and Executive Vice President, Finance of the Corporation or the Executive Vice President and Chief Development Officer of the Corporation and, in the case of a matter involving the Executive Vice President, Corporate of the Corporation, means the President and Chief Executive Officer of the Corporation and in his absence, the Chief Financial Officer and Executive Vice President Finance of the Corporation or the Executive Vice President and Chief Development Officer of the Corporation.

DRIP means the Corporation's dividend reinvestment plan dated March 8, 2012, as amended from time to time.

Insider means a director or officer of the Corporation or a director or officer of a person or company that is itself an insider of the Corporation or a Subsidiary.

Major Subsidiary means a Subsidiary if

- (a) the assets of the Subsidiary, as included in the Corporation's most recent annual audited or interim balance sheet, or, for a period relating to a financial year beginning on or after January 1, 2011, a statement of financial position, are 30% or more of the consolidated assets of the Corporation reported on the balance sheet or statement of financial position, as the case may be; or
- (b) the revenue of the Subsidiary, as included in Corporation's most recent annual audited or interim income statement, or, for a period relating to a financial year beginning on

or after January 1, 2011, a statement of comprehensive income, is 30% or more of the consolidated revenue of the Corporation reported on that statement.

Material fact means any fact that significantly affects or would reasonably be expected to have a significant effect on the market price or value of any of the securities of the Corporation.

Material change means a change in the business, operations or capital of the Corporation that would reasonably be expected to have a significant effect on the market price or value of the securities of the Corporation, including a decision to implement a change made by the directors of the Corporation or by senior management of the Corporation who believe that confirmation of the decision by the directors of the Corporation is probable. In the United States a material change is defined as "any information that a reasonable investor would consider important in a decision to buy, hold or sell securities". Information that could be material includes:

Changes in Corporate Structure

- changes in share ownership that may affect control of the Corporation
- major reorganizations, amalgamations or mergers
- take-over bids, issuer bids or insider bids

Changes in Capital Structure

- the public or private sale of additional securities
- planned repurchases or redemptions of securities
- planned splits of common shares or offerings of warrants or rights to buy common shares
- any share consolidation, share exchange or stock dividend
- changes in the Corporation's dividend payments or policies
- the possible initiation of a proxy fight
- material modifications to rights of security holders

Changes in Financial Results

- a significant change in near-term earnings prospects and financial results for any period
- Major asset write-offs or write-downs
- Major changes in the composition of the Corporation's assets

- any material change in the Corporation's accounting policy

Changes in Business and Operations

- a significant change in capital investment plans or corporate objectives
- significant new contracts, products, patents, or services or significant losses of contracts or business
- changes to the board of directors or executive management
- the commencement of, or developments in, material legal proceedings or regulatory matters
- any notice that reliance on a prior audit is no longer permissible
- significant acquisitions or dispositions

Changes in Credit Arrangements

- the borrowing or lending of a significant amount of money
- major defaults under debt obligations, agreements to restructure debt or planned enforcement procedures by a bank or any other creditors
- changes in rating agency decisions
- significant new credit arrangements

Both positive and negative information can be material. The probability that an event will occur or not affects whether it is material. Any questions concerning the materiality of particular information should be resolved in favour of materiality.

Personnel means all directors, officers and employees of the Corporation or any of its Subsidiaries and such other persons as agree to be bound by the terms of this Policy.

Reporting Insider means:

- (c) the chief executive officer, chief financial officer or chief operating officer of the Corporation or of a Major Subsidiary;
- (d) a director of the Corporation or of a Major Subsidiary;
- (e) a person or company responsible for a principal business unit, division or function of the Corporation;
- (f) a management company that provides significant management or administrative services to the Corporation or a Major Subsidiary, every director of the management company and every chief executive officer, chief financial officer and chief operating officer of the management company;

- (g) an individual performing functions similar to the functions performed by any of the insiders described in paragraphs (a) to (d);
- (h) the Corporation, if it has purchased, redeemed or otherwise acquired a security of its own issue, for so long as it continues to hold that security; or
- (i) any other insider that
 - (i) in the ordinary course receives or has access to information as to material facts or material changes concerning the Corporation before the material facts or material changes are generally disclosed; and
 - (ii) directly or indirectly, exercises, or has the ability to exercise, significant power or influence over the business, operations, capital or development of the Corporation.

Special Relationship Person includes but is not limited to: insiders, directors, officers, employees, contractors, consultants or other persons engaging in professional business activities for or on behalf of the Corporation or its Subsidiaries from time to time with access to material information that has not been generally disclosed.

Subsidiary means a corporation, partnership or other person that is controlled by one or more of the Corporation and other Subsidiaries; for which purpose a corporation or similar entity shall be deemed to be controlled by those corporations, partnerships or other persons who own or effectively control, other than by way of security only, sufficient voting securities of the corporation or similar entity (whether directly through the ownership of securities of the corporation or similar entity or indirectly through the ownership of securities of the corporation or similar entity) to elect the majority of its board of directors; and a partnership or similar entity shall be deemed to be controlled by those corporations, partnerships or other persons that are able to determine policies or material decisions of that partnership or similar entity.

Trading day means a day on which the principal exchange on which the common shares of the Corporation are listed for trading is open for trading.

POLICY

1.1. Application

The responsibility for compliance with the reporting obligations for Reporting Insiders rests with the Reporting Insiders themselves and not with the Corporation. The Corporation has an interest in monitoring the holdings of its Reporting Insiders and ensuring that Reporting Insider holdings are accurately reported as the identity of Reporting Insiders and the size of their holdings may be relevant in determining whether the Corporation is in compliance with its reporting obligations and whether the Corporation is permitted under applicable securities laws and stock exchange rules to undertake certain corporate transactions.

Notwithstanding that some jurisdictions may have different timing requirements for the filing of insider trading reports, it is the Corporation's policy that Reporting Insiders comply with

the most stringent of these timing requirements for the purpose of filing in all jurisdictions even if this results in filings being made in some jurisdictions earlier than may be required.

Notwithstanding anything contained in this Policy, Personnel are required to comply with all applicable securities laws in respect of insider trading and insider reporting and are encouraged to seek independent advice with respect to such laws.

2.1. Disclosure

No Personnel shall disclose or convey in any manner whatsoever any material fact or material change in respect of the Corporation that has not been generally disclosed (see Section 8) to any person (other than other Personnel who have a need to know the same in the course of such other Personnel's relationship to the Corporation and its Subsidiaries), including outside professional advisors, other employees, or members of their families or households, other than in the necessary course of the business, and in those circumstances only with the prior consent of the Designated Officer.

In addition to the foregoing, all Personnel are reminded of the Corporation's policy with respect to corporate disclosure (the "**Disclosure Policy**") and nothing in this Policy is intended to amend or replace the Disclosure Policy in any manner and all Personnel should ensure they are also familiar with the Disclosure Policy.

3.1. Insider Reporting Requirements

3.1.1. Initial Reports

Upon becoming a Reporting Insider, an individual will be so advised by the Designated Officer of the Corporation to ensure the individual is aware of the requirements for Reporting Insiders.

Pursuant to the requirements of applicable securities laws, once a person or corporation becomes a Reporting Insider, an initial report indicating his or her holdings of common shares or other securities of the Corporation or interest in, or right or obligation associated with, certain related financial instruments must be filed with the appropriate securities regulatory authorities within 10 days of the date on which the person or corporation becomes a Reporting Insider.

An initial report is not required, however, when a person becomes a Reporting Insider if he or she has no direct or indirect beneficial ownership or control or direction over common shares or other securities of the Corporation or interest in, or right or obligation associated with, certain related financial instruments.

3.1.2. Subsequent Reports

All Reporting Insiders must file a report of any change in his or her direct or indirect beneficial ownership of, or control or direction over, common shares or other securities of the

Corporation or interest in, or right or obligation associated with, certain related financial instruments with the applicable securities regulatory authorities within 5 days of the date such change takes place. The grant or exercise of options to acquire common shares of the Corporation are trades for such purpose.

3.1.3. Copies of All Insider Reports

All Reporting Insiders shall concurrently with the filing of any such initial or subsequent report with the applicable securities regulatory authorities, copy the same to the attention of the Designated Officer at Suite 800, 311 - 6th Street SW, Calgary, Alberta, T2P 3H2 Attention: Corporate Secretary or by fax at 403 267 6749.

4.1. Trading Restrictions for Reporting Insiders and Special Relationship Persons

4.1.1 Trading

No insider or Special Relationship Person or Personnel shall purchase or sell securities, or enrol in or withdraw from the DRIP, with knowledge of a material fact or material change that has not been generally disclosed (see Section 8).

4.1.2. Trading Blackouts

No purchases or sales of common shares of the Corporation shall be made by any insider or Special Relationship Person during a trading blackout (other than purchases made pursuant to the DRIP). No insider or Special Relationship Person shall enrol in or withdraw from the DRIP during a trading blackout. Regular trading blackouts related to financial results will generally begin ten trading days before the release of financial statements, and will generally terminate at 12:01 a.m. (Calgary time) on the second trading day following the day on which the financial results are released by way of press release. The dates of these regular trading blackouts will be posted by the Designated Officer.

Additional trading blackouts may be imposed from time to time, and without prior notice, at the discretion of the Designated Officer.

Reporting Insiders or Special Relationship Persons who terminate their employment (or other relationship) with the Corporation or its Subsidiaries during a trading blackout shall remain subject to the restrictions set forth in this Section 6 until the end of such trading blackout.

It is the responsibility of each insider or Special Relationship Person to ascertain whether there is a trading blackout in effect at the time he or she proposes to trade in common shares or other securities of the Corporation. Such persons should call the Designated Officer for advice as to whether or not a trading blackout is in effect. In cases where rights to purchase common shares of the Corporation expire during a trading blackout, the holder should submit his or her request to exercise rights to the Designated Officer, which request will be processed upon termination of the trading blackout.

Transactions that may be necessary or justifiable for independent reasons (such as the need to raise money for an emergency expenditure) are no exception.

Notwithstanding the foregoing, insiders or Special Relationship Persons may apply to the Designated Officer for approval to trade securities of the Corporation during a blackout period, which approval shall be considered on a case by case basis and may be denied at the sole discretion of the Designated Officer.

5.1. Other Entities

This Policy also applies to information, obtained in the course of employment with, or by serving as a director or officer of, the Corporation or any of its Subsidiaries, relating to any other issuer, including:

- any issuer with which the Corporation or any of its Subsidiaries may be negotiating a material transaction, or
- any issuer as to which the Corporation or any of its Subsidiaries have an indirect or direct control relationship or a designee on the board of directors.

No insider or Special Relationship Person or Personnel may effect transactions in the securities of any such other issuer while in possession of material information concerning such issuer which has not been generally disclosed and was obtained in the course of employment with the Corporation or any of its Subsidiaries.

6.1. Generally Disclosed

It is the responsibility of each of the Personnel to determine what has been generally disclosed and whether information is a material fact or a material change. Such persons should consult with the Designated Officer if they have any doubt. For the Corporation, a material fact or material change is considered to have been generally disclosed as of 12:01 a.m. (Calgary time) on the second trading day following the day on which a news release disclosing the material fact or material change is issued.

7.1. Short sales, puts, calls

No insider shall knowingly sell, directly or indirectly, a share or other security of the Corporation if such person does not own or has not fully paid for the share or other security to be sold. No insider shall, directly or indirectly, buy or sell a call or put in respect of a share or other security of the Corporation.

Notwithstanding these prohibitions, Reporting Insiders may sell a share which such person does not own if such person owns another security convertible into shares or an option or right to acquire shares sold and, within 10 days after the sale, such person: (i) exercises the conversion privilege, option or right and delivers the share so associated to the purchaser; or (ii) transfers the convertible security, option or right, if transferable to the purchaser.

8.1. Chat Rooms

No Personnel (other than in such circumstances as may be approved by the President and Chief Executive Officer of the Corporation) shall participate in any discussion forums or groups (including without limitation any Internet chat rooms) with respect to the Corporation, any of its Subsidiaries, any securities of the Corporation, any assets in respect of which the Corporation or any of its Subsidiaries has an interest or any other matter which may relate to the business or operations of the Corporation or any of its Subsidiaries.

9.1. Contravention of this Insider Trading Policy

The Corporation and/or the offending individual could face serious legal consequences for a breach of the restrictions on the transmission and use of inside information. Such consequences could include civil and quasi-criminal liability (including fines and imprisonment), securities commission or exchange disciplinary proceedings and internal disciplinary action. Contravention of this Policy shall constitute cause for termination of the offending Personnel.

This Policy was approved by the Board of Directors of the Corporation on June 21, 2005 and may be amended at any time, subject to approval by the Board of Director.

Dated for reference: March 5, 2014