




Policy - Whistleblower

1. Document Control

Name:	HR-POL-06	Title:	Whistleblower Policy		
Dept Owner:	HR	Sensitivity:	Internal		
Apply to:	Region: 	Division:	All	Function:	All
Rev No	Change Date	Change Description	Revision History	Originator	MOC No
3	28-Oct-15	Corporate Secretary made the Compliance Office Reformat		L. Connell	DMOC-0062

2. Purpose

Savanna Energy Services Corp. (the "Corporation") is committed to maintaining the highest standards of integrity and accountability in its business affairs while at the same time growing its business and enhancing shareholder value. As part of our commitment to ethical and responsible business conduct, we are committed to seeking to maintain accountability of our accounting, internal controls and auditing processes ("financial matters"). It is also our policy to try to ensure compliance with all applicable legal and regulatory requirements relating to our business in all material respects. We expect all of our officers, directors and employees to participate actively in seeking to maintain this standard.

The purpose of this whistleblower policy (the "Policy") is to provide officers, directors and employees of the Corporation as well as third parties with a process for disclosing complaints or concerns regarding financial matters and other matters. This Policy tells you exactly how and where to submit a complaint or concern, who deals with your complaint and how that complaint is expected to be handled, processed and documented. This Policy also describes the standards and principles that are expected to govern the processing of all complaints and concerns whether they are received from people within the Corporation or external parties.

3. Scope

This policy applies to all staff of Savanna Energy Services Corp. ("Savanna" or the "Corporation") and its Subsidiaries.

4. Definitions & References

None



Policy - Whistleblower

5. Responsibilities

Savanna Corporate Secretary is designated as the Compliance Officer.

6. Policy Statements

6.1 Reporting Process: Informal Procedure for Directors, Officers, and Employees

The Corporation has an open door policy and invites all directors, officers and employees to share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, your immediate supervisor is in the best position to address an area of concern. Where it is appropriate, you can also speak to any officer of the Corporation whom you are comfortable in approaching. Supervisors and managers are encouraged to report complaints or concerns relating to financial matters to the Chair of the Audit Committee, who has specific responsibility to investigate all such matters, and complaints or concerns relating to non-financial matters, including any breach of the Corporation's Code Business Conduct and Ethics, to the Corporation's designated compliance officer (together with the Chair of the Audit Committee, the "Designated Contact") for purposes of this Policy. Contact information for the Designated Contacts is provided below.

6.2 Reporting Process: Formal Procedure for Directors, Officers, Employees and External Parties

In certain circumstances it may be necessary for you to make a formal submission regarding a perceived or suspected violation of financial matters, securities laws or other matters. In all cases involving financial matters you should communicate directly with the Chair of the Audit Committee, through the following means:

1. by telephone: 403-503-1650 (Please note there is no caller ID system operating at this number)
2. by email: AuditChair@savannaenergy.com
3. in writing: Address: Suite 800, 311 - 6th Avenue S.W. Calgary, AB T2P 3H2
Fax: 403-267-6749
Attention: Chair of the Audit Committee



Policy - Whistleblower

Please clearly mark your correspondence as "CONFIDENTIAL"

In all cases involving non-financial matters, including any breach of the Corporation's Code of Business Conduct and Ethics, you should communicate directly with Savanna's Corporate Secretary, who is designated as the Compliance Officer for the purposes of this policy through the following means:

1. by telephone: 403-503-9990 (ask to speak with Corporate Secretary)
2. in writing:
Name: Savanna Energy Services Corp.
Address: Suite 800, 311 - 6th Avenue S.W. Calgary, AB T2P 3H2
Fax: 403-267-6749
Attention: Corporate Secretary

If the formal submission pertains to the compliance officer, or you are otherwise uncomfortable with providing your submission to the compliance officer, then the same should be submitted to the Chair of the Audit Committee.

The Audit Committee is a committee of the Board of Directors and is not and shall not be deemed to be an agent of the Corporation's shareholders for any purpose whatsoever.

6.3 Confidentiality

The Corporation, including all persons designated to handle complaints under this Policy, will seek to treat all communications as confidential to the fullest extent permitted under law and to the extent possible, consistent with the need to conduct an adequate investigation. We encourage you to identify yourself when making a complaint or communicating a concern. However, you may also do so anonymously if necessary.

6.4 No Retaliation

It is the Corporation's policy to seek to ensure that you can communicate freely in respect of matters covered by this Policy and seek to be protected from any form of penalty or adverse employment consequence, including discharge, suspension, demotion or transfer, harassment or discrimination ("retaliation"). Every director, officer or employee who makes a complaint in good faith regarding a perceived violation under this Policy will be protected against any retaliation. Any director, officer or employee who retaliates against someone who has reported a violation in good faith under this Policy will be subject to discipline up to and including termination of employment. This Policy is intended to encourage and enable officers, directors and employees and third parties to raise serious concerns within the Corporation for proper resolution.

6.5 Acting in Good Faith



Policy - Whistleblower

Anyone filing a complaint under this Policy must be acting in good faith and have an honest belief that the complaint is well-founded, including a reasonable factual or other basis. Any complaints based on allegations that are without basis, cannot be substantiated, or that are proven to be intentionally misleading or malicious will be viewed as a serious offense.

6.6 Handling of Reported Violations

Once your concern has been communicated to the Designated Contact, the following procedures are intended to be followed:

1. The Designated Contact should confirm receipt of your communication or complaint within ten business days of receipt wherever practicable or where specifically requested.
2. The Designated Contact should register your complaint in a log and open a file. Both should be confidential and secure.
3. If the Designated Contact determines that your concern is covered by this Policy, he or she should conduct an investigation and determine whether further action is required. In conducting his or her investigation, the Designated Contact may enlist inside or outside legal, accounting, human resource or other advisors and, in the case of the compliance officer, may also refer the matter to the Chair of the Audit Committee.
4. The Designated Contact should comply with all rules, regulations and legislation in conducting his or her investigation and should take all reasonable efforts to seek to keep the complaint and investigation confidential, if requested or required. In certain circumstances, the Corporation may be required to disclose matters relating to material infractions of financial matters or other matters in accordance with securities laws or stock exchange rules. In such cases the Designated Contact may be required to make adequate disclosure in a timely and appropriate manner.
5. All investigations should be conducted efficiently, taking into account the nature and complexity of the issues involved.
6. Quarterly, the compliance officer should report to the Audit Committee, and the Chair of the Audit Committee should report to the Corporation's external auditors, the aggregate number of complaints received, investigations conducted and the outcome of those complaints and investigations. The Audit Committee may also discuss such complaints with the full membership of the Board of Directors where appropriate.
7. Where the complaint is made to the compliance officer, the compliance officer should promptly report to the Audit Committee any complaint that is well-founded and that may have material adverse consequences for the Corporation.
8. The Chair of the Audit Committee should discuss any complaints received pursuant to this Policy at regularly scheduled meetings of the Audit Committee (unless they are unfounded or unless the materiality of the complaint requires earlier action).

In addition to reporting suspected violations of financial matters, certain other provincial and federal legislation relating to environmental, labour, privacy, human rights, competition and other matters also provide protection to individuals who report suspected violations by their employers. We encourage all



Policy - Whistleblower

employees to comply fully with the requirements of these laws if any violation or breach is suspected, without fear of retaliation.

The Board of Directors may, from time to time, permit departures from the terms of this Policy, either prospectively or retrospectively. This Policy is not intended to give rise to civil liability on the part of the Corporation or its directors or officers to shareholders, security holders, customers, suppliers, competitors, employees or other persons, or to any other liability whatsoever on their part.

This Whistleblower Policy was approved by the Board of Directors of the Corporation on November 2, 2015 and may be amended at any time.