

### 1. Commitment

The management of Total Energy Services Inc. (“**Total Energy**”) and its subsidiaries and affiliates in Canada (each a “**Division**”, where each Division and Total Energy are collectively and individually, as the case may be, the “**Company**”) are committed to providing a safe, productive work environment in which all workers are treated with respect and dignity, as well as to eliminating, or, if that is not reasonably practicable, controlling the hazards of workplace harassment and violence. Acts of workplace harassment and violent behavior or threat of violence in the workplace by any person are strictly prohibited and will not be tolerated by the Company.

To achieve these objectives, the Company has developed and implemented a workplace harassment and violence prevention plan, comprised of this Policy and the accompanying *Prevention of Workplace Harassment and Violence Procedures* (the “**Procedures**”, attached as Appendix “1”). Such Procedures may be supplemented by internal processes specific to any Division.

### 2. Scope

The Policy applies to all workers and others at a Company workplace or work-related activity, including customers, suppliers and members of the public. Everyone is obligated to uphold this Policy and to work together to prevent workplace harassment and violence.

Total Energy and each of its Divisions will at all times adhere to all local applicable laws and regulations with regard to matters of workplace harassment, including discrimination, sexual harassment and bullying, and matters of workplace violence. Such laws shall govern to the extent of any omission or conflict with any provision herein.

### 3. Definitions

The following meanings shall apply for the purposes of the Policy and Procedures:

“**bullying**” includes cyberbullying and is a form of harassment and includes offensive, unreasonable, intimidating or insulting behavior, often repeated or persistent, including the abuse of power with the intent to undermine, humiliate or injure the recipient.

“**executive**” means an officer or General Manager of Total Energy or any Division, as applicable.

“**HR**” means the Human Resources Department at Total Energy or any Division, as applicable.

“**HSE**” means the Health, Safety & Environment Department at Total Energy or any Division, as applicable.

“**sexual harassment**” is nonconsensual behavior of a sexual nature known or reasonably ought to have been known to be unwelcome such as sexual solicitation or advances, comments or physical contact, including touches, pinches or gestures that are suggestive or sexual in nature, leering, “dirty” jokes, pornographic pictures or materials, sexual innuendoes and requests or demands of a sexual nature.

“**supervisor**” means any worker supervising one or more workers (including controllers, branch managers, safety managers/coordinators, rig managers, managers, supervisors, and lead hands).

“**worker**” includes all employees, directors, officers, consultants, agents and contractors of Total

Energy or its Divisions, as the case may be.

“**workplace**” includes (i) Company premises; (ii) offsite at Company-sponsored business or social events, during work-related travel, at conferences, training sessions and seminars attended for work; and (iii) work or worker-related telephone, online, electronic and other communications.

“**workplace harassment**” means any repeated or serious single incidents of objectionable or unwelcome conduct, comment, bullying or action by a person, whether work-related or at a workplace, that the person knows or ought reasonably to know will or would cause offence or humiliation to a worker or adversely affects a worker’s health and safety, and includes conduct, comment, bullying or action because of race, religious beliefs, colour, gender, gender identity, gender expression, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, sexual orientation or any of the prohibited grounds of discrimination provided in applicable human rights legislation and includes workplace sexual harassment. Reasonable action taken by the Company or its supervisors relating to the management or direction of workers or a worksite, including performance appraisals, work assignments, workplace inspections and disciplinary actions, is not harassment.

“**workplace violence**” means any threatened, attempted or actual conduct, action, threat or gesture by a person, whether at a workplace or work-related, that causes or is likely to cause physical or psychological injury or harm to another person, including: physical acts (eg. hitting, shoving, gesturing, pushing, kicking, sexual assault), threatening statements or behavior which give the person reasonable cause to believe that they are at risk of injury and disruptive behavior not appropriate to a workplace such as yelling and swearing. It also includes workplace behaviours that threaten or damage personal or Company property and domestic or sexual violence. Such acts of workplace violence may occur as a single event or may involve a continuing series of incidents.

## 4. Responsibilities

### 4.1 Responsibilities of Workers

- to work in compliance with this Policy and the Procedures.
- to act professionally and respectfully towards other individuals in the workplace and to make every safe effort to prevent harassing, bullying, discriminating and violent behavior in the workplace.
- to report any incidents of workplace harassment or violence to their supervisor, HR, HSE, an executive or confidentially to the Company in accordance with the Procedures.
- to co-operate with any efforts to investigate and resolve matters arising under this Policy.
- to participate in required training and acknowledge understanding of and compliance with this Policy as required by the Company from time to time.

### 4.2 Responsibilities of Supervisors

- to ensure that measures and procedures are followed by workers under their supervision and that such workers have the information they need to protect themselves, including appropriate training on how to report incidents or concerns.
- to take immediate and appropriate action to report or deal with incidents of workplace harassment or violence.

- to immediately report to HR or HSE or an executive all incidents or allegations of workplace harassment or violence, whether brought to their attention or personally observed, in accordance with the Procedures.
- to record event particulars relating to instances of workplace harassment or violence, provide such records to the investigator and assist in investigations as required.
- to address the needs of all parties concerned and ensure that both complainants and respondents have access to support during the resolution process.
- to ensure that corrective actions, including disciplinary measures, determined as a result of an investigation are implemented.

### 4.3 Company Responsibilities

- to ensure that this Policy and the Procedures are implemented and maintained.
- through the HR and HSE departments, to ensure that all workers receive appropriate information and training regarding the Policy and Procedures and any related safe work procedures.
- to investigate and take appropriate corrective actions to address all incidents and complaints of workplace harassment and violence in a fair, respectful and timely manner.
- to ensure that sufficient attention and resources are dedicated to address the factors that contribute to workplace harassment and violence and to take action to minimize or eliminate the risk.

## 5. Complaints

Workers are strongly encouraged to follow the attached *Procedures for the Prevention of Workplace Harassment and Violence* to report any incidents of workplace harassment or violence. No workers can be penalized, reprimanded or in any way criticized when acting in good faith while following the Policy and the Procedures, however any worker making a complaint that is found to be frivolous, malicious or otherwise made in bad faith will be subject to appropriate disciplinary action, up to and including termination for cause. The Company will also ensure that any reprisal taken against any person providing information in good faith is not tolerated and is addressed with appropriate disciplinary actions.

## 6. Investigations

The Company will take all complaints of harassment and violence seriously and in accordance with the Procedures, will investigate any incidents of harassment or violence and, where substantiated, will take corrective action to address the incidents and implement appropriate measures that would assist in eliminating or controlling the hazards of workplace harassment or violence. Anonymous complaints lacking reasonable substantiation will not normally be investigated. The Company and all workers will also cooperate with any investigation of an incident by authorized regulatory authorities.

All investigations should be properly documented in accordance with the Procedures and applicable law, and a copy provided to regulatory authorities when required by applicable law.

### 7. Confidentiality and Privacy

The Company will respect the privacy of all concerned as much as possible and will not disclose the circumstances related to an incident of workplace harassment or violence or the names of the parties involved (including the complainant, the person(s) alleged to have committed the violence or harassment, and any witnesses), except where necessary to investigate the incident or to take corrective action to address the incident, to inform the parties involved in the incident of the results of the investigation and any corrective action to be taken, to inform a worker of a specific or general threat of workplace violence or potential workplace violence, or as required by law. Where necessary to inform a worker of a specific or general threat of violence or potential violence, The Company will disclose only the minimum amount of personal information that is necessary.

Workers are reminded that the Company reserves the right to search all areas of Company property, including personal vehicles at a worksite and to view email and data stored on Company-issued computers and phones. Any conversations overheard in the workplace or private voice or electronic messages retrieved that are considered to be threatening will be considered workplace harassment and/or violence.

### 8. Training of Workers

The Company will ensure that all workers are appropriately trained in respect of the Policy and Procedures. Employees will receive training as part of the new employee orientation and will receive refresher training on an appropriate regular basis. All employees are required to participate in such training as a condition of their employment. Training should include recognition of incidents of workplace harassment and violence and procedures for obtaining assistance, reporting, investigating and documenting such incidents. The Company will also ensure that investigators of incidents of workplace harassment and violence receive proper training in investigative techniques and the Procedures.

### 9. Assistance

Any employee exposed to workplace harassment or violence may seek assistance through Company's employee assistance programs. No deduction will be made from pay or benefits for the time during regular work hours during which an employee attends any prescribed treatment session relating to a workplace incident.

### 10. Consequences of Non-Compliance

Any worker reasonably suspected by the Company of engaging in workplace harassment or violence may be suspended from entering Company worksites or representing the Company at work-related events, pending the outcome of an investigation. **Any worker who subjects another person to workplace harassment or violence or is otherwise found to be in violation of this Policy will be subject to**

appropriate disciplinary action commensurate to the incident, up to and including termination of employment or consulting agreement for cause. A record of any disciplinary action will be maintained on the worker file.

## 11. Legal Rights

Nothing in this Policy is intended to discourage or prevent a worker from exercising their rights pursuant to any other applicable law, including pursuing a complaint to the relevant governmental agency responsible for human rights or occupational health and safety.

## 12. Review and Questions

Total Energy will review the Policy and Procedures at least every three (3) years or as required by applicable law, and whenever there is a change of circumstances that may affect the health and safety of workers.

Questions regarding this Policy may be directed to an executive, Total Energy's Vice President, Operations or Total Energy's General Counsel.

This corporate *Prevention of Workplace Harassment and Violence Policy* is approved this 1st day of August, 2022.



Brad Macson  
Vice President, Operations  
Total Energy Services Inc.