

Respectful Workplace Policy

Effective: March 15, 2018, amended and restated July 15, 2024

PrairieSky Royalty Ltd. ("**PrairieSky**" or the "**Company**") is committed to providing a healthy and safe working environment where all Workers (defined below) are free from violence and harassment. This Respectful Workplace Policy (the "**Policy**") outlines conduct that is prohibited at PrairieSky and sets out the reporting process for violations of the Policy, along with the Company's obligation to investigate and take appropriate action where complaints are received.

This Policy applies to PrairieSky applicants, employees, contractors, and volunteers (collectively, "**Workers**") at the work site as well as outside of the work site while a Worker represents PrairieSky (collectively, the "**Workplace**").

1. Definitions

Violence means the threatened, attempted or actual conduct of a person that causes or is likely to cause physical or psychological injury or harm. It can include physical attack or aggression, threatening behavior, verbal or written threats, domestic violence, and sexual violence.

Harassment means objectionable or unwelcome conduct, comment, bullying, or action by a person that the person knows or ought reasonably to know will or would cause offence or humiliation to a Worker, or adversely affects the Worker's health and safety, including 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, or sexual orientation.

Reasonable action taken by PrairieSky, or its management or supervisors, which relates to the management and direction of Workers or the Workplace, is not harassment.

2. Prohibition against Violence, Harassment and Bullying

Workplace violence and harassment is prohibited by law and will not be tolerated at the Workplace. PrairieSky is committed to eliminating or, if that is not reasonably practicable, controlling the hazards of violence and harassment at the Workplace.

3. Reporting Violence and Harassment

A Worker who experiences or observes an incident of harassment or violence must promptly report the incident to their immediate manager or, in the case of a contractor, their applicable Company contact. If a satisfactory response is not received, or if the Worker is uncomfortable or unable to report a potential violation to their immediate manager or their

applicable Company contact, as applicable, the Worker may contact Human Resources or the Vice-President, Finance & Chief Financial Officer. Any member of management who receives a report pursuant to this Policy shall advise Human Resources immediately.

If a Worker wishes to make a confidential complaint, they may contact the Whistleblower Hotline:

- Phone toll free: 1.800.661.9675
- Online at www.prairiesky.confidenceline.net

Reports submitted through the Whistleblower Hotline will be investigated in the same manner as any other complaint, to the extent possible given the nature of the complaint.

Reports should include as much supporting information as possible, such as the date and location of the event(s), a description of the circumstances, and the name of any persons who might have perpetrated and or/witnessed them.

Without limiting a Worker's ability to report any violation of this Policy or otherwise seek assistance, a Worker who experiences or observes unwanted behaviour that does not amount to harassment or violence is encouraged to firmly tell the perpetrator that their behaviour is not acceptable and ask them to stop. Such informal resolution strategies are, however, not appropriate in instances where an incident of harassment or violence has occurred. In such cases, the incident must be promptly reported in accordance with this Policy.

In the event that any PrairieSky Worker requires immediate assistance when an incident of violence occurs, they are encouraged to obtain immediate assistance by calling 911 (as appropriate) or the GWL Security Desk at (403)-265-0300 (as applicable).

4. Company Response

PrairieSky will investigate complaints of violence and harassment in a fair, respectful, and timely manner and take corrective action to address incidents of harassment and violence.

Regardless of the outcome of the investigation, a Worker who makes a report under this Policy in good faith, as well as anyone providing information in relation thereto, will not be subjected to any form of retaliation.

Allegations of violence or harassment that were made in bad faith or with malicious intent will be viewed as serious violations of this Policy.

Investigation Process for Incidents of Violence and Harassment

- **Step 1: Investigation** – The investigator will collect all relevant information and facts in respect of the incident. The complainant will be asked to provide all relevant information and facts including dates, times, places, names (including witnesses) and other details relating to the incident(s). The investigation will

include, where appropriate, written statements outlining names, dates, times of the offence(s), the nature of the alleged discrimination, harassment or violence, and the names of any potential witnesses. The investigator will, with suitable sensitivity and the protection of the parties in mind, conduct individual interviews with all involved parties and document discussions. The investigator will prepare a written report that documents all relevant information and acts in respect of the incident.

- **Step 2: Legal Review** – The investigator will compile a report. It will be reviewed by Human Resources, the Company's Legal Counsel and the Vice President, Finance & Chief Financial Officer, who will then decide on the appropriate next steps.
- **Step 3: Resolution** – Once a decision has been reached, the results of the investigation will be communicated to the appropriate parties as soon as reasonably practicable.
- **Step 4: Implementation** – Any measures or disciplinary actions that have been identified as a result of any investigation shall be implemented as soon as practicable.

5. Confidentiality

The Company will not disclose the circumstances of a harassment 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; and/or
- as required by law.

Should the Company have to disclose personal information to inform Workers 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 to achieve that end.

6. Further Rights

While the Company prefers to resolve complaints internally and encourages Workers to work with the Company to reach a healthy, productive, confidential and expeditious resolution, nothing in this Policy is intended to discourage a Worker from exercising rights under any other law, including the *Alberta Human Rights Act*.

7. Non-Compliance

Any Worker who violates this Policy or relevant laws may be subject to disciplinary action, up to and including termination of employment for just cause or termination of contract, as applicable.

8. Review

The Company will review and, if necessary, revise this Policy (and/or any related procedures) in consultation with the Company's Joint Worksite Health and Safety Committee on the earliest of the following:

1. when an incident of harassment or violence occurs;
2. if the Joint Worksite Health and Safety Committee recommends a review of this Policy (and/or any related procedures); and
3. annually.

DATED this 15th day of July, 2024.



Andrew Phillips

President and Chief Executive Officer