

Appendix “1” to the Workplace Harassment and Violence Policy

PREVENTION OF WORKPLACE HARASSMENT AND VIOLENCE PROCEDURES

In support of the Policy, the following Procedures shall apply to the Company and each of its Divisions to provide a complaint resolution process and a process for addressing the following elements in respect to workplace harassment and workplace violence:

- hazard identification, assessment and controls and development of safe work procedures
- reporting of incidents
- investigation and documentation of incidents
- investigation response and corrective actions

These Procedures may be supplemented with internal processes specific to any Division. Definitions are as provided in the Policy.

1. Hazard Identification, Assessment and Controls

Division HSE, with the support of Company HSE and HR will, for each job or position in the Division:

- identify and assess hazards associated with workplace harassment and workplace violence;
- create and complete hazard assessment and control forms;
- identify measures to eliminate or control each hazard and provide recommendations to the Company;
- advise workers of the nature and extent of hazards and train workers appropriately to attempt to eliminate or minimize such risks; and
- develop safe work procedures and worker training based on the hazards and controls identified.

Where there exists a general or specific threat of workplace violence, HSE will promptly advise affected workers of the risk and the safeguards to be taken with respect to such threat, ensuring that only the minimum amount of personal information necessary to inform workers of such threat is disclosed.

Where hazards of workplace violence are identified, the Company will implement the use of engineered and administrative hazard controls as necessary to eliminate or minimize the hazards to an acceptable level. Such hazard controls include but are not limited to: electronic locks, locked doors, key and/or fob access, secured gates and fencing, rules, procedures and signage.

2. Reporting

Throughout the complaint resolution process, all workers involved must respect the privacy of all concerned and keep confidential and not disclose the circumstances related to the incident or the names of the complainant, respondent or any witnesses, except where necessary to investigate the incident, take corrective action, to inform the parties involved in the incident of the results of the investigation and the corrective action taken. Workers may be required to sign a non-disclosure/confidentiality agreement as part of an investigation.

a. Reporting Emergencies

TO REPORT EMERGENCIES including situations of **immediate danger, weapons involvement, physical injury related to violent behavior or obvious signs of abusive threatening behavior,** workers are expected to **CALL 911 IMMEDIATELY**, and then promptly report all such situations to their supervisor. The supervisor should immediately inform HSE/HR and an executive and in consultation with such persons and make every safe effort to eliminate or minimize any immediate risk, including taking appropriate steps to warn others of any potential danger.

b. Reporting Non-Emergency Complaints

Where appropriate, in conjunction with or as an alternative to making a complaint, a worker who believes that they have been subjected to workplace harassment may always choose to resolve the issue themselves, by first clearly and firmly making known to the alleged harasser that their behavior is objectionable and must stop.

WHEN TO MAKE A COMPLAINT:

Workers must report a complaint in the following situations:

- all incidents of workplace violence, whether suffered by, reported to or witnessed by the worker;
- all incidents of workplace harassment that have not been resolved informally, whether suffered by, reported to or witnessed by the worker;
- if they are concerned about their own or any other person's safety due to workplace violence or potential workplace violence;
- if they are concerned about Company property due to workplace violence or potential workplace violence;
- if they have been retaliated against for reporting or providing information in violation of the Policy; or
- if they are otherwise aware of a breach of the Policy.

WHERE TO MAKE A COMPLAINT:

Workers may make a complaint to their Division supervisor, HR or HSE or executive:

- Where the person designated as the reporting contact is in a position of conflict (including if they are the respondent or are under the direct control of the respondent), the report should be made to another reporting contact.
- If complainant is not satisfied with the process or resolution of a previous complaint, the report should be made to an alternate reporting contact.
- If a person is not comfortable reporting within their Division, they are encouraged to report the incident directly to Total Energy's Vice President, Operations or General Counsel.
- Any person may make use of Total Energy's confidential Whistleblower Hotline at whistleblower@totalenergy.ca or make a complaint in writing in accordance with Total Energy's

Whistleblower Policy. Anonymous complaints that lack reasonable substantiation will not normally be investigated.

c. Complaint Details

Workers may make complaints orally or in writing. However, workers who make oral complaints may be required to verify in writing the accuracy of the oral complaint once it has been reduced to writing. In making a complaint, the worker (and the person receiving the complaint) should ensure that they have carefully recorded details of the incident including:

- a description of the complaint;
- the frequency, date(s), times(s) and location(s) of the incident(s);
- names of people involved and witnesses; and
- all supporting documentation.

The complainant's record is their personal record and property, however the Company will rely on the information it contains to make its investigation.

d. Assistance

Employees should be advised to consult a health professional of their choice if they are exposed to workplace harassment or workplace violence, and shall be advised to consult a health professional of their choice if they sustain an injury or other adverse symptoms as a result of workplace harassment or workplace violence. The Company's employee assistance programs are available to employees.

3. Investigation

a. Initiation of Investigation

Where the supervisor or other person to whom a worker or other person has made a complaint believes that there is a reasonable possibility that an incident of workplace harassment or workplace violence has occurred, they will promptly report the situation to the HR Manager of their Division and/or HSE as appropriate as to the nature and specifics of the complaint. HR/HSE shall ensure that all serious allegations of workplace violence or workplace harassment or criminal behaviour are promptly reported to the executive.

Where it is determined by HR or HSE that an incident of workplace harassment or workplace violence may have occurred, an investigation shall be commenced, which will be directed by HR unless not appropriate in the circumstances. A qualified investigator will be appointed, with an outside investigator assigned where appropriate due to a conflict of interest.

Notwithstanding that a worker has not made a complaint, or seeks to withdraw a complaint after having made one, the Company shall investigate any incident of workplace violence or workplace harassment of which it becomes aware.

If the Company determines that (i) a complaint does not properly fall under this Policy, (ii) the complaint is frivolous, malicious or made in bad faith, or (iii) there is insufficient evidence that an incident has or will occur, the Company may dismiss the complaint without conducting any further investigation (or, if in the

course of the investigation, may decide not to proceed with further investigation), and may otherwise work with the complainant to resolve any issues raised.

b. Acknowledgment

Once it is determined that an investigation will be undertaken, the investigator will advise the complainant and the respondent of the investigation and the nature and specifics of the complaint.

c. Conduct and Documenting of Investigation

The investigator will commence a confidential and impartial investigation, including, where reasonable, conducting interviews of the complainant, the respondent, witnesses and others who may have knowledge of the incident or circumstances that led to the complaint or are responsible for the workplace. All parties to the investigation may have their own representation.

The investigator shall ensure that their report and all documents collected or created during the course of the investigation will be maintained in a secured location by the department leading the investigation for at least three (3) years from the date of the report, provided that the investigation report may be retained for longer than three (3) years where reasonable to do so in the circumstances to fulfil a legitimate work-related purpose or otherwise required by law.

No documentation will be placed on the complainant's employment file where the report is made in good faith, whether the complaint is upheld or not. Documentation will be retained in a confidential file separate from the employee file to allow the case to be reopened in the event of other claims of a similar nature in the future.

d. Investigative Findings and Corrective Actions

The investigator may make a finding of sufficient evidence to support a finding of violation, insufficient evidence to support a finding of a violation, or no violation of the Policy.

The investigator will make reasonable efforts to prepare a report for Division HR and the executive within thirty (30) working days of the respondent being advised of the complaint.

HR, in consultation with the HR Director and/or the HSE Manager, as appropriate, will review the investigation findings and determine whether or not the reported conduct is workplace harassment and/or workplace violence and recommend subsequent corrective actions to the executive to minimize or eliminate the risk, including through the use of personal protective equipment, administrative arrangements, engineering controls and disciplinary actions.

The executive will make a decision as to whether to dismiss or act upon the report from the investigator and any recommendations from HR within thirty (30) working days of receiving the report and determine and implement corrective actions to address the incident, if any. Where required by applicable legislation or as is otherwise appropriate, a finding of workplace harassment or workplace violence will be reported to the appropriate authorities (e.g., Alberta Occupational Health and Safety or the police).

In determining the appropriate corrective action, the executive will consider, but is not bound by, the recommendations of HR and the findings of the investigator.

e. Response

The executive or their designate shall promptly advise the complainant and respondent and responsible supervisor(s) of the outcome of the investigation and any corrective action to be taken to address the incident, to the extent required by law.

f. Learnings

All learnings resulting from the investigation of any incident of workplace harassment and workplace violence shall be reported to the Director, Human Resources, the HSE Manager and/or the Total Energy Vice President, Operations, as appropriate.

HSE, in consultation with any Division joint health and safety committee shall determine any new measures to eliminate or minimize the hazard of violence or harassment identified as a result of the investigation and make recommendations to the Company for implementation.

Total Energy will revise the Policy and Procedures as necessary to accommodate any investigation learnings that will serve to eliminate, or if that is not reasonably practicable, control the hazards of workplace harassment or violence.

These corporate *Prevention of Workplace Harassment and Violence Procedures* are approved August 1, 2025.



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