

MEG ENERGY CORP. RESPECTFUL WORKPLACE POLICY

Last Updated: January 28, 2015

PURPOSE: to ensure a common understanding by all employees, consultants, contractors and vendors of MEG Energy Corp. ("MEG") of what constitutes appropriate workplace behaviour and actions and to set out MEG's commitment to prevent and/or deal with all reported instances of unacceptable/unlawful behaviour.

This document supports MEG's *Business Conduct Charter*, which states:

"...we are committed to a workplace that is free of harassment and discrimination and we believe that all employees should be treated with dignity and respect."

At MEG, we do not tolerate harassment, workplace violence or unlawful discrimination against any individual. We believe that all individuals should be treated with dignity and respect and so are committed to fostering a respectful workplace.

WHAT IS A RESPECTFUL WORKPLACE?

A respectful workplace is one which is free of discrimination, harassment and workplace violence, where all individuals feel safe, respected and treated fairly. It is impossible to itemize every attribute of a respectful workplace, but here are a few examples to help guide you. A respectful workplace is one where:

- *All workers are polite, courteous and respectful of others*
- *Everyone is treated equitably and fairly*
- *People feel listened to and that their opinions, thoughts and input are valued*
- *Ideas are received with an open mind and are judged on their merit*
- *Diversity amongst workers is embraced as a strength*
- *People are aware of how their actions and behaviours, whether verbal, written or physical, affect others in the company, and consistently act with respect and consideration towards others*

All employees, consultants, contractors and vendors of MEG have a responsibility to conduct themselves in a manner consistent with promoting a respectful workplace.

WHAT TYPES OF BEHAVIOR AND ACTIONS ARE NOT TOLERATED AT MEG?

Discrimination includes behaviours or practices that result in adverse or differential treatment of an individual or group based on characteristics such as age, ancestry, colour, family status, marital status, mental or physical disability, place of origin, race, religious beliefs, sexual orientation, source of income, or gender (including pregnancy). These are the specific grounds currently protected from discrimination (the "Protected Grounds") under Alberta's *Human Rights Act*. Discriminatory behaviour will not be tolerated at MEG.

Harassment includes comments, actions or visual displays which are demeaning, abusive, malicious or humiliating and which a reasonable person would perceive as being unwelcome. Harassment that is discriminatory in nature includes comments, actions or visual displays that are targeted toward an individual or individuals because of a group to which they belong or appear to belong. Such comments or actions may, or may not be based on one or more of the Protected Grounds mentioned above. While all forms of harassment are prohibited by this policy, discriminatory harassment is also unlawful. Behaviour

need not be intentional to constitute harassment, and it need not be directed at a specific individual. Harassment may involve a single incident or a series of incidents. Harassment will not be tolerated at MEG.

Workplace Violence includes the exercise, threatened (express or implied), actual or attempted, of physical force against another individual, in a workplace, that causes or could cause physical injury to the individual's person or property or to property of MEG or a third party. Workplace violence will not be tolerated at MEG. For purposes of this policy, the term workplace will be interpreted broadly to mean a location where an individual who is either an employee, consultant, contractor or vendor of MEG is, or is likely to be, engaged in an occupation and includes any vehicle or mobile equipment, used by any such individual in an occupation as well as, in the case of individuals who live or stay at MEG's field location(s) while they are working, any living or recreational facilities provided by MEG.

While not intended to be in any way comprehensive, the list below provides examples of either discrimination, harassment or workplace violence and is intended to serve as a guide:

- *Denial of equitable treatment in hiring or in the terms, conditions, or benefits of employment*
- *Failing to take reasonable steps to accommodate an individual's needs based on the Protected Grounds and as required under Alberta's Human Rights Act*
- *Conduct, comments, actions, visual displays or gestures which are humiliating, offensive, hurtful or belittling*
- *Repeated conduct that has, in past, served to be considered harassment or discrimination*
- *Behaviour or actions that are unwanted or hostile*
- *Harassment, including sexual, which includes unwelcome advances, physical contact or gestures of a sexual nature whether they are verbal, visual or physical*
- *Displays of pornographic or other sexual materials in the form of pictures, electronic mail, graffiti, cartoons or sayings*
- *Behaviour that undermines the employment relationship or makes an individual believe that there has been an improper condition placed on employment*
- *Threats to an individual, an individual's property or MEG's property*
- *Any statement, either verbal or written, that is reasonably interpreted by a person to be menacing or taunting such as coercion, intimidation, humiliation, bullying, ridiculing or belittling*
- *Following or stalking an individual*
- *Acts of physical aggression which harm, or threaten to harm, an individual*

WHAT TYPES OF BEHAVIORS AND ACTIONS DO NOT CONSTITUTE VIOLATIONS OF THE POLICY?

It is the duty of a manager or supervisor to supervise individuals, monitor their work and assess their performance. Normal supervisory functions, which may include justifiable and reasonable feedback of an individual's work or performance, are not violations of this Policy. Disagreement on professional issues or review of an individual's conduct or performance does not of itself constitute discrimination or harassment.

WHAT CAN YOU DO IF YOU FEEL YOU ARE BEING HARASSED OR DISCRIMINATED AGAINST OR ARE WITNESSING OR EXPERIENCING WORKPLACE VIOLENCE?

- All MEG employees, consultants, contractors and vendors have a responsibility to be role models for MEG's corporate behaviour standards as outlined in this Policy.
- Individuals who believe they have been treated in a manner which violates this Policy or who have witnessed a violation of this Policy should first consider telling the offending party that he/she objects to that conduct and telling the offending party to stop. In the majority of situations, this will solve the problem.
- If the individual is either uncomfortable confronting the offending party, or has confronted the offending party to no avail, he/she should consider speaking to his/her immediate supervisor.
- If the individual is more comfortable discussing the issue with someone other than his/her immediate supervisor, or if the individual is not satisfied with the course of action the supervisor has taken, the individual should contact someone either in MEG's Human Resources Department or in MEG'S Legal Department.
- In the case of threats of, attempts of or actual incidents of workplace violence, in advance of the responses suggested above, an individual who feels threatened by violence or is experiencing a violent incident should leave the area immediately and if necessary, call for assistance from a co-worker, building security or 911.
- Following any threatened, attempted or actual violent incident a report should be made immediately to a supervisor or to someone in MEG's Human Resources Department or in MEG's Legal Department. A person making a report will be asked to cooperate with any investigation surrounding the incident.

WHAT WILL MANAGEMENT DO WHERE A REPORT OF A VIOLATION OF THIS POLICY IS MADE?

MEG management has a responsibility to develop workplace arrangements to minimize and effectively control harassment, discrimination and workplace violence. All complaints will be dealt with promptly and in a professional and discreet manner. Confidentiality will be maintained throughout the investigation to the extent practicable and permitted by law. No reprisals or retaliation will be tolerated against any individual who, in good faith, reports or participates in the investigation of any alleged violation of this Policy.

In the event of a report of an incidence of workplace violence and, as appropriate harassment or discrimination, MEG management will take immediate action following such report to reduce the risk of further incident or injury, ensure that First Aid is provided or medical resources are called and activate appropriate crisis management procedures to assist the victim where necessary.

Finally, MEG management will conduct periodic reviews of reports of violations of this policy and make recommendations as appropriate to prevent the occurrence of further incidents.

WHAT ARE THE CONSEQUENCES OF A VIOLATION OF THIS POLICY?

Violations of this Policy may be unlawful and will be considered violations of the *Business Conduct Charter*. The consequences of each situation will be determined based on its specific facts. Violations of this Policy may result in legal consequences as well as discipline up to and including dismissal of an employee for cause or termination of a contractual relationship with MEG, as the case may be.

WHAT CAN YOU DO IF YOU FEEL YOU ARE BEING HARASSED?

Contact MEG's Confidence Line at 1-800-661-9675 or www.meg-energy.confidenceline.net to report violations of our [Respectful Workplace Policy](#) or [Business Conduct Charter](#).