



Prevention of Workplace Harassment and Violence Policy and Procedures - Canada

February 1, 2019

To: All Employees and Contractors of Total Energy Services Inc. and our Affiliates and Subsidiaries in Canada

The management of Total Energy Services Inc. ("Total") and each of its affiliates and subsidiaries (including Bidell Gas Compression Ltd., Savanna Drilling Corp., Savanna Well Servicing Inc., Total Oilfield Rentals Ltd. and Spectrum Process Systems Inc.) are dedicated to fostering a workplace free of harassment, (including bullying and discrimination) and violence. We are committed to providing a safe, productive and healthy working environment for our employees and contractors, based on mutual respect. In pursuit of this, Total and its affiliates do not condone and will not tolerate any work-related acts of harassment or violence against or by any of our employees or contractors.

The attached *Prevention of Workplace Harassment and Violence Policy and Procedures* have been revised to reflect recent changes to applicable legislation, set expectations around how we behave in the workplace and provide a framework around how incidents of harassment and violence are reported and investigated.

The Policy and Procedures apply to every employee, officer, director and contractor of Total and its affiliates and subsidiaries. We all have the responsibility to read, understand and adhere to these principles and procedures. Compliance is mandatory and failure to comply creates unacceptable risk for Total and its affiliates, our workers and our stakeholders.

We expect all workers to work together to promote a safe, inclusive and respectful workplace. If you are the subject of or otherwise become aware of an incident or potential incident of workplace harassment or violence, please report the incident in accordance with the procedures, and at any time speak with your supervisor, any member of the executive team, Human Resources, HSE or email whistleblower@totalenergy.ca about any concerns that you may have. Total will not tolerate retaliation against anyone who raises a concern or makes a report in good faith.

We are all responsible for creating a positive and safe work environment. Thank you for your continued commitment in doing so.

Sincerely,

Brad Macson
Vice President, Operations

February 2019



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PREVENTION OF WORKPLACE HARASSMENT AND VIOLENCE POLICY

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,

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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.

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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.

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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.

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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 more often as required by applicable law, including 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 30th day of January, 2019.



Brad Macson
Vice President, Operations
Total Energy Services Inc.

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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 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 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.

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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 harassment may always choose to resolve the issue themselves, by first clearly and firmly make known to the alleged harasser that their behavior is objectionable and must stop.

WHEN TO MAKE A COMPLAINT:

Workers should report a complaint in the following situations:

- all incidents of violence or harassment, 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.

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- 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, HR Director, Safety Manager 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 may be required to verify in writing the accuracy of an 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 violence or sustain an injury or other adverse symptoms, including through the Company's employee assistance programs.

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 violence has occurred, they will promptly report the situation to HR Manager of their Division, HSE and/or Legal as appropriate as to the nature and specifics of the complaint. HR/HSE shall ensure that all serious allegations of workplace violence or harassment or criminal behaviour are promptly reported to an executive.

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- Where it is determined by HR, HSE or Legal that an incident of harassment or 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, the Company shall investigate any incident of violence or harassment of which it becomes aware.
- If it is determined that there is no reasonable possibility that an incident of workplace harassment or violence occurred, the supervisor, HR or HSE will work with the worker to attempt to resolve the issue.

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 two (2) years from the date of the report, provided that the investigation report may be retained for longer than two (2) years where reasonable to do so in the circumstances.
- 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 prepare a report for Division HR and the executive (or Legal, if so directed) within thirty (30) working days of the respondent being advised of the complaint.

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- HR, in consultation with Legal, the HR Director and/or the HSE Manager, as appropriate, will review the investigation findings and determine whether or not the reported act is workplace harassment and/or 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 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, a finding of workplace harassment or violence will be reported to regulatory authorities.

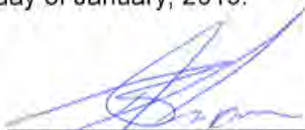
e. Response

- 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 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 this 30th day of January, 2019.



Brad Macson
Vice President, Operations
Total Energy Services Inc.