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|  | Workplace Respect | |
| | Policy #: Workplace Respect | Created by: Human Resources |
| | Applicable to: All salaried and hourly personnel, direct service providers, contractors, and executive officers | Approved by: W. J. (Bill) Lingard |
| | Dated: September 1, 2007 | Revised: October 26, 2009 |

1.0 Purpose

FLINT Energy Services Ltd. is committed to providing our employees with a positive, professional and safe working environment. An integral part of making our employees feel included, respected and valued is to provide a work environment free from physical or psychological bullying, harassment or violence in any form. A respectful work environment is one where all employees are actively living by our core values and are all committed to ensuring that People are #1 – 24/7.

2.0 Policy

To support our objective of providing a healthy and safe working environment, no employee shall cause or participate in disrespectful actions in the workplace. It is the responsibility of managers, supervisors, and all employees to take action to ensure that violations of respect are eliminated and reported. FLINT will ensure that all employee complaints of such treatment are investigated in a discreet and confidential manner and resolved expeditiously.

3.0 Definitions

We believe in a positive and proactive approach to workplace respect and are committed to educating our entire organization on what constitutes a respectful, healthy and safe working environment through our Workplace Respect Program. The following definitions help outline the behaviours that are considered unacceptable under this policy:

Bullying is physical or verbal intimidation that is deliberate, repeated and severe enough to harm the targeted person's health, safety or ability to do their job.

Harassment is when a worker is subjected to unwelcome verbal or physical conduct because of a personal characteristic or attribute. This includes remarks or actions based on the race, colour, religion, gender, sexual orientation, marital or family status, physical characteristics, disability, age, nationality, ancestry, or place of origin of an employee or group of employees. Harassment may lead to a real or perceived threat to the health, safety or well-being of an employee or create an intimidating, hostile, or poisoned work environment.

Third Party: EthicsPoint has been engaged by FLINT Energy Services Ltd. to provide independent third party communications and reporting tools allowing any person to report his or her complaint of any kind in a confidential and anonymous manner.

Workplace violence is the threatened, attempted or actual conduct of a person that causes or is likely to cause physical injury. These acts include threats, menacing or threatening behaviour, and all types of physical or verbal assaults.

4.0 Procedures

- An employee who believes he/she has been subject to any form of disrespectful action is encouraged to firmly and clearly make known to the offending individual that their behaviour is deemed to be disrespectful, and insist that the offending behaviour stop.

- If an employee cannot confront the behaviour individually, he/she is encouraged to speak directly with the immediate manager, supervisor, Human Resources representative, or senior management.
- An employee who believes he/she is subject to disrespect by his/her immediate manager, supervisor may address his/her concerns directly to a Human Resources representative.
- If the employee cannot address the issue directly to a manager, supervisor, Human Resources representative, or senior management, he/she should contact FLINT's third party to report the issue. The employee may speak with a third party representative 24/7 through a toll-free helpline, or by visiting the third party's website and follow the anonymous website reporting procedures. The third party ensures confidentiality; employee identity will not be revealed without employee agreement. The third party will forward the information to the appropriate FLINT representative. Contact information for the helpline is posted at all FLINT locations, on the company's website, and on the company's intranet ('OFE').
- Upon receipt of a complaint of a disrespectful action, a manager, supervisor will consult with Human Resources to conduct a confidential investigation.
- The identity of the complainant and that of the individual alleged to have committed an act of disrespect, will not be disclosed without their knowledge, and only when required to fully investigate the complaint.
- Retaliation against anyone making a complaint or raising an issue will not be tolerated by FLINT.
- In order to resolve the complaint, the Human Resources representative will make recommendations to the appropriate manager, supervisor or Vice President as to the corrective action necessary to rectify the situation and prevent any recurrence. This recommendation will be in accordance with the Progressive Discipline Policy. It will be the responsibility of the manager, supervisor to ensure the required actions are taken.

The achievement and preservation of a respectful workplace at FLINT requires the commitment of all employees.

5.0 Third Party Contact Information

Complaints can be reported confidentially and anonymously at any time to EthicsPoint through FLINT's Integrity Helpline by accessing the following:

Website: www.flintenergy.ethicspoint.com

Toll-Free: 1.888.332.3564