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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist management and employees work together in addressing fraud, abuse, and other misconduct in the workplace, all while cultivating a positive work environment. **Frontera Energy** has implemented this anonymous ethics hotline, provided by NAVEX Global (the “Ethics Hotline”) as a corporate services provider that is independent of the Corporation.

Why do we need a system like EthicsPoint?

- Personnel and Relationship Parties are usually the first to know when something is going seriously wrong. A culture of turning a “blind eye” to such problems means that the alarm is not sounded and those in charge do not get the chance to take action before real damage is done. Whistleblowing can therefore be described as giving information about potentially illegal and/or underhanded practices (i.e., wrongdoing) without fear of reprisal.
- By creating open channels of communication, we can promote a positive work environment and maximize productivity.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to file a confidential, anonymous report via either the telephone or the Internet.

What type of situations should I report?

The EthicsPoint system is designed for Personnel and Relationship Parties to report any violation of our Code of Business Conduct and Ethics, or other concern you may have related to a wrongdoing.

Wrongdoing involves any unlawful or illegal behavior and can include:

- An unlawful act whether civil or criminal;
- Breach of or failure to implement or comply with any approved Corporation policy;
- Knowingly breaching applicable laws or regulations, including but not limited to laws prohibiting bribery, corruption, money laundering or financing of terrorism;
- Unprofessional conduct or acting below recognized, established standards of practice;
- Questionable accounting or auditing practices, including without limitation:
 - Deceptive or fraudulent practices; or
 - Destruction, defacement, concealment or falsification of any account or of any record or document made or required for any accounting purpose;
- A dangerous practice likely to cause physical harm/damage to any person/property;
- Failure to rectify or take reasonable steps to report a matter likely to give rise to a significant and avoidable cost or loss to the Corporation;
- Abuse of power or authority for any unauthorized or ulterior purpose;
- Any unfair discrimination in the course of the employment or provision of services; or
- Retribution in connection with a good faith whistleblowing complaint made under the Policy.

This list is not definitive, but is intended to give an indication of the kind of conduct which might be considered as “wrongdoing”.

If I see a violation, shouldn't I just report it to my manager, security, or human resources and let them deal with it?

Personnel may report a complaint or concern as follows:

- Through the Corporation's confidential and anonymous ethics hotline, provided by Navex Global (the "Ethics Hotline"), a corporate services provider that is independent of the Corporation;
- By contacting your supervisor, manager or executive responsible for the department. This depends, however, on the seriousness and sensitivity of the issues involved and who is suspected of malpractice; or
- By contacting the Ethics & Compliance Officer or Chair of the Audit Committee. The Audit Committee Chair can be contacted in writing by sending an email with the word "Confidential" in the subject line to the following address: AuditCommitteeChair@fronteraenergy.ca.

Relationship Parties may report a complaint or concern to the General Counsel or through the Ethics Hotline.

Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. Corporate misconduct can threaten the livelihood of an entire company.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within the company who are charged with evaluating the report, based on the type of violation and location of the incident. Each of these report recipients has had training in keeping these reports in the utmost confidence.

How does the corporation responses to complaints or concerns?

The Corporation will respond positively to your concerns.

Investigation

Investigations will be carried out pursuant to the Ethics Complaints Protocol under the leadership of the Ethics & Compliance Officer and Ethics Committee.

The Corporation will take steps to minimize any difficulties which a complainant may experience as a result of raising a concern. For instance, if a person is required to give evidence in criminal or disciplinary proceedings, the Corporation will arrange for the person to receive advice about the procedure.

The Corporation accepts that complainants need to be assured that the matter has been properly addressed. Thus, subject to legal constraints, the Corporation will inform complainants of the outcomes of any investigation.

Review of Complaints

The Audit Committee will review in the aggregate all complaints and investigations made pursuant to the Policy on a quarterly basis.

What is the time frame needed to investigate?

Concerns will be investigated as quickly as possible. It should also be kept in mind that it may be necessary to refer a matter to an external agency or advisors, and this may result in an extension of the investigative process. Also, the seriousness and complexity of any complaint may have an impact upon the time taken to investigate a matter. A designated person will indicate at the outset the anticipated time scale for investigating the complaint.

How does the Corporation prevent recriminations?

The Corporation will not tolerate an attempt on the part of anyone to apply any sanction or detriment to any person who has reported to the Corporation a genuine concern that they may have regarding an apparent wrongdoing.

Is the confidentiality and anonymity assured?

The Corporation will respect the confidentiality of any whistleblowing complaint received by the Corporation where the complainant requests that confidentiality. The Corporation will take reasonable measures, including only disclosing on a need-to-know basis, to ensure the confidentiality and privacy of any whistleblower, where confidentiality or anonymity is requested by the whistleblower. However, it must be appreciated that it will be easier to follow up and to verify complaints if the complainant is prepared to give his or her name. There may also be circumstances where identity is required by law.

What about false and malicious allegations?

The Corporation is committed to acting with the highest standards of honesty. It will therefore ensure that appropriate resources are dedicated to investigating any complaint which it receives. However, it is important to realize that the Corporation will view very seriously any allegations which prove to have been made maliciously or knowing them to be false. The Corporation will regard the making of any deliberately false or malicious allegations by any Personnel as a serious disciplinary offence which may result in disciplinary action, up to and including dismissal for cause.

Reporting Security & Confidentiality

It is my understanding that any report I send from a company computer generates a server log that shows every web-site that my PC connects with, and won't this log identify me as a report originator?

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable making a report on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports are generated during business hours.

Can I file a report from home and still remain anonymous?

A report from home, a neighbor's computer, or any Internet portal will remain secure and anonymous. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity.

I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years..."

Is the telephone toll-free hot line confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

Tips & Best Practices

I am not sure if what I have observed or heard is a violation of company policy, or involves unethical conduct, but it just does not look right to me. What should I do?

File a report. EthicsPoint can help you prepare and file your report so it can be properly understood. We'd rather you report a situation that turns out to be harmless than let possible unethical behavior go unchecked because you weren't sure.

What if my boss or other managers are involved in a violation? Won't they get the report and start a cover-up?

The EthicsPoint system and report distribution are designed so that implicated parties are not notified or granted access to reports in which they have been named.

What if I remember something important about the incident after I file the report? Or what if the company has further questions for me concerning my report?

When you file a report at the EthicsPoint Web site or through the EthicsPoint Call Center, you receive a unique report key and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer company questions. You and the company now have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity.

Can I still file a report if I don't have access to the Internet?

You can file an EthicsPoint report from any computer that can access the Internet. You can file from home. Many public locations, including the public library, have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.