

BIRCHCLIFF

E N E R G Y

CODE OF BUSINESS CONDUCT AND ETHICS

Table of Contents

Introduction.....	1
Application of the Code.....	1
Interpretation of the Code	1
Business Integrity and Fair Dealing	1
Corporate Opportunities	1
Conflicts of Interest	1
Confidentiality	2
Protection and Proper Use of Corporate Assets	2
Use of Email, Internet and Information Technology Assets and Services	3
Privacy	3
Disclosure and Use of Social Media.....	3
Business Communications.....	3
Insider Trading and Tipping	4
Accuracy of Corporate Records and Reporting	4
Relationship with External Auditors and Reserves Evaluators	4
Compliance with Laws, Rules and Regulations.....	5
Child Labour and Forced Labour.....	5
Health, Safety and Environment	5
Respectful Workplace.....	5
Professional Development	6
Community, Stakeholders and Indigenous Rights.....	6
Political Activities and Contributions.....	6
Lobbying	6
Gifts and Entertainment	7
Anti-Bribery and Anti-Corruption	7
Breaches	8
Waivers.....	8
Reporting Behavior that Violates Rules.....	8
Violations of the Code and Disciplinary Action	9
Compliance Procedures.....	9

Introduction

This Code of Business Conduct and Ethics (this “**Code**”) reflects Birchcliff Energy Ltd.’s (“**Birchcliff**”, “**we**”, “**us**”, “**our**” or “**its**”) commitment to a culture of honesty, integrity and accountability in all areas in which we operate and outlines the basic principles and policies with which all employees, officers, directors, consultants, contractors and suppliers are expected to comply.

Please read this Code carefully. Your cooperation is necessary to Birchcliff’s continued success and the cultivation and maintenance of our reputation as a good corporate citizen.

Application of the Code

This Code applies to all employees (whether part-time, full-time, temporary or permanent), officers and directors of Birchcliff and outlines our similar expectations of all consultants, contractors and suppliers of Birchcliff while working for, or under the direction of, Birchcliff (“**you**” or “**your**” and collectively, “**Workers**”).

Interpretation of the Code

In addition to complying with this Code in all aspects of your business activities, you are expected to seek guidance in any case where there is a question about compliance with the letter or spirit of this Code. This Code sets forth general principles and does not supersede any specific Birchcliff policies and procedures or contractual provisions.

In this Code, references to: (i) the “**Board**” means Birchcliff’s Board of Directors; (ii) the “**Chairman**” means the Chairman of the Board; (iii) the “**CEO**” means the Chief Executive Officer of Birchcliff; and (iv) the terms “**including**” or “**includes**” mean “including without limitation” or “includes without limitation”, as the case may be.

Business Integrity and Fair Dealing

We are committed to conducting all of our affairs with honesty, integrity and fairness and we expect the same from all of our Workers. Each Worker should endeavour to deal fairly with Birchcliff’s customers, suppliers, competitors, contractors, employees and all other stakeholders. Workers are prohibited from making false or deceptive statements about our competitors. Birchcliff seeks competitive advantages through superior performance, not through unethical or illegal business practices. Workers will not collude in any way with any competitor to unlawfully fix prices, discounts or terms of sale or divide markets, market shares, customers or territories. No Worker should take unfair advantage of anyone through illegal conduct, manipulation, concealment, abuse of confidential information, misrepresentation of material facts or any other unfair-dealing practice.

Corporate Opportunities

Workers are prohibited from taking advantage of opportunities discovered through the use of corporate property, information or position and from using corporate property, information or position for personal gain.

Employees, officers and directors are also prohibited from competing with Birchcliff; provided that the foregoing shall not apply to directors solely as a result of them acting as directors or officers of other companies which they do not control.

Conflicts of Interest

Workers must avoid conflicts of interest with Birchcliff. A conflict of interest may be actual, apparent or potential and exists whenever an individual’s personal interests, directly or indirectly, interfere or conflict or appear to interfere or conflict with one’s obligation to act in the best interests of Birchcliff. Conflicts of interest also arise when you, or a member of your family, receive improper personal benefits as a result of your position with Birchcliff. Loans to, or guarantees of obligations of, such persons are likely to pose conflicts of interest, as are transactions of any kind between Birchcliff and any other organization in which you or any member of your family have an interest.

Full disclosure in writing of any actual, apparent or potential conflicts of interest to the CEO or, for directors and officers, to the Chairman, enables Workers to resolve unclear situations and provides an opportunity to dispose of conflicting interests before any problems arise. Directors and officers of Birchcliff must also adhere to additional obligations as set out in the *Business Corporations Act* (Alberta), including obligations relating to material transactions or material agreements in respect of which a director or officer has an interest, and must inform the Chairman of any such conflict or potential conflict.

No employee or officer of Birchcliff should serve as an officer or director of any corporation or partnership that Birchcliff does not control or have an ownership or partnership interest in (other than personal holding corporations), without the prior approval of the CEO in the case of employees and the Chairman in the case of officers. Notwithstanding the foregoing, employees and officers are permitted to serve as directors or officers (e.g. Secretary, Treasurer) of non-profit, industry, charitable, religious or civic organizations without prior approval, provided it does not interfere with or impair the ability of the employee or officer to perform their duties at Birchcliff, all such work is conducted primarily during personal time and does not create a conflict of interest.

During work hours, employees of Birchcliff are expected to devote their full time and attention to Birchcliff and their assigned duties. Unrelated activities, including unrelated educational, employment, consulting or business activities, are not permitted during work hours. In addition, all employees have a duty to act in good faith and to be loyal to Birchcliff as their employer. Employees who engage in outside employment or consulting activities (commonly referred to as “moonlighting”), without Birchcliff’s knowledge or authorization, may be in breach of that duty or otherwise in a conflict of interest and should discuss with their supervisor, manager or applicable executive officer prior to engaging in any such activities.

Workers who perceive a conflict between this Code and any professional code of conduct or ethics to which they are subject to should consult Birchcliff’s General Counsel.

Confidentiality

In the normal course of our business, you may become aware of confidential information. Birchcliff’s confidential information includes: (i) non-public information of a technical, business or financial nature; and (ii) non-public information regarding our business partners, employees, agents, contractors, service providers or customers. Birchcliff’s confidential information may be our own information or it may be information that we received from our partners or other third parties.

In addition, Birchcliff confidential information includes our proprietary information. Proprietary information includes any non-public information that would be helpful to our competitors or would be harmful to our competitive position. Examples of proprietary information include our acquisition and exploration plans and prospects and business and marketing plans.

In all cases, you must not disclose Birchcliff’s confidential information to any person outside of Birchcliff unless such disclosure has been authorized by your supervisor, manager or an executive officer of Birchcliff or is legally mandated. You must also take reasonable care to protect the confidential information of Birchcliff from theft or unauthorized access. The obligation to protect Birchcliff confidential information continues even after you leave Birchcliff.

Protection and Proper Use of Corporate Assets

All Workers should endeavour to protect Birchcliff’s assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on our profitability and our ability to efficiently run our business. Any suspected incidents of fraud or theft should be immediately reported for investigation. See “*Reporting Behaviour that Violates Rules*” in this Code.

Birchcliff’s assets, including information, data, office equipment and computers, tools, vehicles, facilities and funds, may only be used for legitimate business purposes. Birchcliff’s assets may never be used for illegal purposes.

The product of the efforts produced by employees within the scope of their employment with Birchcliff is the sole and exclusive property of Birchcliff. This includes intellectual property and other work product you may have created or developed during the course of your employment, such as computer programs, discoveries, writings, technical processes, inventions, research methods, reports or articles and any other form of innovation or development.

With respect to the consultants, contractors and suppliers of Birchcliff, the ownership of intellectual property and work product is governed by the terms of your contract with Birchcliff.

Use of Email, Internet and Information Technology Assets and Services

Birchcliff's employees, officers, directors and other persons who use or access our information technology ("IT") assets or services (collectively, "Users") are subject to our Information Technology Acceptable Use Policy (the "IT Acceptable Use Policy"). The IT Acceptable Use Policy outlines the acceptable and unacceptable use of Birchcliff's IT assets and services and all Users are expected to be aware of and comply with such policy. Users are provided with access to Birchcliff's IT assets and services to assist them in performing their duties for Birchcliff, which assets and services are to be used for legitimate business purposes only. Reasonable personal use is permissible, provided that such personal use does not interfere with the performance of their duties for Birchcliff, does not create a conflict of interest with our business and is otherwise in accordance with the IT Acceptable Use Policy. While using Birchcliff's IT assets and services, Users must be aware of and respect applicable laws and third-party intellectual property rights and must not use Birchcliff's IT assets or services to solicit, access, create, download, transmit, share, display or store Offensive or Illegal Material (as such term is defined in the IT Acceptable Use Policy).

Please refer to the IT Acceptable Use Policy for more information.

Privacy

In conducting our business, Birchcliff needs to maintain records and information about our employees, contractors, vendors, landowners, shareholders and other business associates. We value and respect the rights of these individuals to personal privacy. We protect the confidentiality of personal information and will only collect, use and disclose personal information in accordance with our Privacy Policy and applicable laws. Please refer to Birchcliff's Privacy Policy for more information.

Disclosure and Use of Social Media

In order to maintain the consistency and quality of our disclosure to our stakeholders and to limit the potential for leaks of confidential information or selective disclosure, Workers must not speak on behalf of Birchcliff except when: (i) it is within the confines of your defined role at Birchcliff; (ii) you are authorized to do so by an executive officer of Birchcliff; or (iii) it is legally mandated.

In addition, Workers should refrain from disclosing or discussing matters relating to Birchcliff on blogs, tweets, bulletin boards, social networking and other social media sites, unless they are specifically permitted to do so on behalf of Birchcliff. Workers should also use their best judgment when posting personal opinions on social media that could be reflected back on Birchcliff.

Business Communications

Business records and communications may become public through legal or regulatory investigations or the media. Workers should be professional in their records and communications and avoid exaggeration, derogatory remarks, unsupported conclusions, inappropriate characterizations or any other inappropriate comments. This applies to written communications of all kinds, including email, instant messages, information notes and interoffice memos.

Insider Trading and Tipping

The market price of our shares is based on public knowledge about our results and prospects. The markets rely on all participants having equal access to all public information. From time to time, you may become aware of or have material information about Birchcliff or a third party that has not yet been disclosed to the general public. It is illegal for anyone with knowledge of material information affecting a public issuer that has not been publicly disclosed to purchase or sell securities of that issuer. It is also illegal for anyone to inform any other person of material non-public information (commonly referred to as “tipping”), including to friends and family members, other than when it is in the “necessary course of business”. Extreme caution should be used when relying on this exception and the courts and various securities commissions have provided guidance on what is considered to be in the necessary course of business.

There are serious sanctions for these matters, including substantial fines and potential jail sentences. Therefore, if you have knowledge of material non-public information about Birchcliff or other public issuers you are prohibited from trading securities of Birchcliff or any such other public issuer until the information has been fully disclosed and a reasonable period has passed for the information to be widely disseminated.

If you are unsure whether information has been publicly disclosed, you should consult Birchcliff’s General Counsel prior to engaging in any transaction involving the securities of Birchcliff or a third party or disclosing such information to another person.

Please refer to Birchcliff’s Securities Trading Policy for more information.

Accuracy of Corporate Records and Reporting

Honest and accurate recording and reporting of information is critical to our ability to make responsible business decisions and to comply with our legal obligations. As a public company, Birchcliff is required to file periodic and other reports with the Canadian securities regulatory authorities and to make certain public communications. Birchcliff’s accounting records are relied upon to produce reports for Birchcliff’s management, shareholders, lenders, governmental agencies and others. Our financial statements and the books and records on which they are based must accurately reflect all corporate transactions and conform to all legal and accounting requirements and our system of internal controls.

All employees have a responsibility to ensure that Birchcliff’s accounting records that they are responsible for or that they are involved in the preparation of do not knowingly contain any false or intentionally misleading entries. We do not permit intentional misclassification of transactions as to accounts, departments or accounting periods. All transactions must be supported by accurate documentation in reasonable detail and recorded in the proper account and in the proper accounting period. All employees must immediately report any known inaccuracies to their supervisor or manager and must not conceal from Birchcliff’s management, auditors, the Audit Committee and the Board, as the case may be, information that might reasonably be expected to have a material impact on the accuracy of Birchcliff’s reporting.

Relationship with External Auditors and Reserves Evaluators

The integrity of Birchcliff’s financial and reserves reporting is of utmost importance to our shareholders, the investment community and the employees, officers and directors of Birchcliff. Workers must not engage in any conduct considered to be an improper influence on Birchcliff’s auditors or reserves evaluators. This includes offering or paying bribes, providing them with inaccurate or misleading legal analysis or threatening to cancel existing engagements if the auditor or reserves evaluator objects to the accounting or evaluation treatment.

Any Worker observing behaviour described above is required to report such behaviour to the CEO or the Chief Financial Officer of Birchcliff. If you do not feel comfortable reporting the matter to the CEO or Chief Financial Officer, please refer to *“Reporting Behaviour that Violates Rules”* in this Code to report the situation.

Compliance with Laws, Rules and Regulations

Compliance with both the letter and spirit of all laws, rules and regulations applicable to our business is critical to our reputation and continued success. All Workers must strive to obey the laws, rules and regulations of the municipalities, provinces and countries in which we operate, including the laws, rules and regulations applicable to Birchcliff's securities and trading in such securities, as well as the rules of any exchange on which Birchcliff's securities are listed, and avoid even the appearance of impropriety.

Child Labour and Forced Labour

We recognize the fundamental importance of human rights and Birchcliff is committed to not causing, contributing to or being directly linked to, practices of modern slavery, including forced labour and child labour. Birchcliff does not use forced labour or child labour and does not knowingly purchase goods or components that use forced labour, child labour or that otherwise involves other human rights abuses. Our commitment to human rights is guided by international and national standards, including all applicable federal and provincial laws and regulations, including labour rights, freedom of association, working hours and Canada's *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

Health, Safety and Environment

We are committed to continually improving our health, safety and environmental management system. Workers are responsible and accountable for maintaining a safe workplace by following all applicable health and safety rules and practices. Workers must report any accidents, injuries, unsafe equipment, practices or conditions immediately to their supervisor, manager or other designated person. If you have any questions regarding the reporting of any of the foregoing, please consult a member of Birchcliff's Health and Safety Team or discuss the matter with an executive officer of Birchcliff. Please refer to Birchcliff's Health and Safety Policy for more information.

Birchcliff maintains strict compliance with all applicable federal and provincial environmental laws and regulations. If a Worker has any doubt as to the applicability or meaning of a particular environmental, health or safety regulation, they should consult a member of Birchcliff's Health and Safety Team or discuss the matter with an executive officer of Birchcliff.

In order to protect the safety and well-being of all Workers, the public and the environment, Workers must, at all times throughout their workday or shift and when designated on-call, be able to safely and acceptably perform their duties without any limitation due to the use or after-effects of drugs, alcohol, cannabis or medication. Please refer to Birchcliff's Drug, Cannabis and Alcohol Policy for more information.

Respectful Workplace

Birchcliff is committed to ensuring our workplace is free of harassment, discrimination and violence. We do not discriminate on the basis of race, religious beliefs, colour, gender, gender identity or expression, physical or mental disability, age, ancestry, place of origin, marital status, source of income, family status or sexual orientation or any other characteristic protected by applicable laws. Birchcliff does not tolerate harassment, violence or discrimination in any form and is committed to: (i) providing a positive and healthy work environment, where the dignity of all individuals is respected; and (ii) eliminating or, if that is not reasonably practicable, controlling the hazards of harassment and violence. Workers are encouraged to report any incidents of harassment, violence or discrimination at work.

Please refer to Birchcliff's Harassment, Violence and Discrimination Policy for more information.

Professional Development

We encourage and support the professional development of our employees, officers and directors. Employees, officers and directors are expected to keep abreast of professional developments in their field. Additionally, where our employees, officers and directors are members of a recognized profession, they are expected to perform their duties in accordance with the recognized standards of that profession and abide by any code of ethics adopted by their professional association.

Community, Stakeholders and Indigenous Rights

We recognize the importance of positive relationships with our stakeholders and local community members, including Indigenous communities. All Workers have a responsibility to represent Birchcliff in accordance with our ongoing efforts to build strong community relationships and our reputation through responsible operation, transparency and respectful engagement with neighbours, First Nations and landowners in accordance with applicable laws.

Political Activities and Contributions

We respect and support your right to participate in political activities of your choice provided that your involvement is kept separate from your role at Birchcliff. You must take care to represent your views as your own and not as Birchcliff's views. These activities should be conducted on your own time and should not involve the use of any of corporate resources of Birchcliff, unless specifically approved by an executive officer of Birchcliff.

No person may make, or commit to make, political contributions on behalf of Birchcliff or with Birchcliff's funds, assets, property or other things of value without the prior approval of the CEO. There are laws and regulations pertaining to political contributions made both in dollars and "in kind". Where Birchcliff deems it appropriate, we may occasionally choose to make such contributions but only when authorized by the Chairman or the CEO and only when the contribution is legal and appropriate for corporations such as Birchcliff.

Lobbying

Lobbying is communication in any form with elected officials and certain civil servants of federal, provincial or municipal governments, also known as "public office holders", for the purposes of developing or amending laws, regulations, policies or guidelines, or to obtain a financial benefit, such as a grant or contribution. The term "public office holder" applies to a much broader range of individuals beyond just elected officials and includes essentially all individuals who would be considered public servants. If a Worker has a question regarding who is considered a public office holder, they should consult Birchcliff's General Counsel.

We are required to comply with applicable lobbying legislation, which imposes registration and reporting requirements on specified lobbying communications with designated public office holders. In order to ensure that we are compliant with applicable lobbying legislation, Workers shall not engage in any lobbying activities or engage a consultant lobbyist on Birchcliff's behalf without the prior approval of the CEO.

In addition, applicable legislation imposes various restrictions on both the giving and offering of gifts, favours, entertainment or benefits of any kind (including the provision of food, beverages or other hospitality or event or conference invitations) (collectively, "Gifts") by lobbyists to public office holders.

If you are unsure whether your communications with a public official or public office holder may be regulated or if you are unsure as to whether the giving or offering of a Gift is permissible, you should consult Birchcliff's General Counsel.

Gifts and Entertainment

The rules set forth herein apply at all times and do not change during traditional gift-giving seasons.

General

The exchange of gifts and entertainment is a common practice in most business communities and is designed to develop and foster goodwill among business partners. However, the acceptance and giving of Gifts can cause problems when doing so may compromise, or appear to compromise, our ability to make fair and objective business decisions. Employees are expected to act responsibly and with integrity and use their good judgment when making a decision on whether to accept the offer of a Gift and vice versa when the employee is offering a Gift.

The following rules apply to the giving and offering of Gifts:

- No Gift should be accepted or offered if it will unfairly influence a business relationship. Employees must avoid the appearance and the act of improperly influencing business relationships with the organizations or individuals with whom they deal.
- Gifts should be moderate, reasonable and in good taste, be of a style or value commonly accepted for business occasions and should not be unusual for the recipient's job or community.
- Gifts should not be accepted if they could be reasonably considered to be extravagant for an individual in the position of the recipient.
- The exchange must be transparent, made in accordance with applicable laws and create no obligation or sense of obligation, and should occur infrequently.

If a business invitation includes recreational opportunities or event tickets that are of significant value or involve air travel, overnight accommodation or other similar significant costs, the prior approval of your supervising executive officer is required, or in the case of the CEO, approval by the Chairman. If there is a valid business reason for you to be at the event, your supervising executive officer may approve your attendance, which may be subject to certain conditions.

If there is any doubt about the acceptance or giving of any Gift, you should consult Birchcliff's General Counsel.

Government Officials

While Gifts are a familiar feature of business relationships and networking, Gifts provided to domestic or foreign government officials to obtain an improper advantage for Birchcliff can violate anti-corruption or other laws. As discussed above under "*Lobbying*", applicable legislation imposes various restrictions on both the giving and offering of Gifts by lobbyists (which includes Birchcliff) to public office holders. If you are unsure as to whether the giving or offering of a Gift to a public office holder or other government official is permissible, you should consult Birchcliff's General Counsel.

Anti-Bribery and Anti-Corruption

Birchcliff is committed to conducting its business in an honest and ethical manner and in full compliance with all applicable anti-corruption laws, including Canada's *Criminal Code* and *Corruption of Foreign Public Officials Act* (the "**CFPOA**"). These laws prohibit bribery and corruption of government officials, as well as in the private sector. Government officials are defined broadly under these laws and can include: (i) officials and employees of all levels of government (federal, provincial, and local); (ii) directors, officers and employees of government or state-owned companies; (iii) officials or employees of Indigenous governments; (iv) judges and ambassadors; (v) customs, tax and police personnel; (vi) political parties, party officials and candidates for political office; and (vii) employees of public international organizations.

Violations of anti-corruption laws can expose Birchcliff and its Workers to criminal prosecution, significant fines or forfeiture and imprisonment. Non-compliance also threatens Birchcliff's reputation, which plays a critical role in our success. The CFPOA can apply to Birchcliff and its Workers' actions anywhere in the world and therefore must be complied with on a global basis.

Unlawful or unethical behaviour in Birchcliff's workforce is not tolerated. Workers are strictly prohibited from soliciting, accepting, offering, paying, promising or authorizing bribes or other illicit payments to or from any government officials or private persons for any purpose. This is equally true for corruption or bribery facilitated indirectly through third parties, such as through family members, business associates or intermediaries. Situations where judgment might be influenced or appears to be influenced by improper benefits must be avoided. Payment or acceptance of any "kickbacks" to or from a contractor, supplier or other external party is strictly prohibited.

In addition, Birchcliff also prohibits all forms of "facilitation payments", even where such payments may be permissible by the laws of the jurisdiction where such payment is received. Facilitation payments, also known as "grease" payments, are payments to government officials to secure or expedite performance of acts of a routine nature. Facilitation payments are prohibited by the CFPOA and, accordingly, are strictly prohibited.

Breaches

To the extent that the CEO of Birchcliff is unable to make a determination as to whether a breach of this Code has taken place, the Chairman (or if deemed appropriate by the Chairman, the Board) will review any alleged breach of the Code to determine if a breach has occurred.

Waivers

No waiver of this Code may be made where the conduct subject to the waiver contravenes applicable laws or the rules or regulations of any stock exchange to which Birchcliff is subject.

Waivers of this Code for Workers (other than officers and directors) may only be granted by the CEO; provided that any material waivers will only be granted with the concurrence of the Chairman or another director.

Waivers of this Code for officers and directors may only be granted by the Board.

Reporting Behavior that Violates Rules

We are committed to conducting our business in a lawful and ethical manner. Workers are encouraged to talk to supervisors, managers, officers, directors or other appropriate personnel when in doubt about the best course of action in a particular situation and must report actual, potential or suspected violations of applicable laws, Birchcliff policies and procedures or this Code. We prohibit retaliatory action against any Worker who, in good faith, reports an actual, potential or suspected violation. All reports will be treated confidentially. It is unacceptable to file a report knowing it to be false.

If a Worker wishes to anonymously report any violations of applicable laws, Birchcliff policies and procedures or this Code, they can report their concerns to Birchcliff's Independent Lead Director. They should include sufficient detail to allow the Independent Lead Director to understand their concerns. Any such reports should be submitted to the Independent Lead Director in a sealed envelope labeled as follows:

PRIVATE AND CONFIDENTIAL – To be opened by the addressee only

Independent Lead Director of Birchcliff Energy Ltd.

c/o Birchcliff Energy Ltd.

Suite 1000, 600 – 3rd Avenue S.W.

Calgary, Alberta T2P 0G5

All such envelopes received by Birchcliff will be forwarded promptly and unopened to the Independent Lead Director. If the reporting person wishes to discuss the matter with the Independent Lead Director, this request should be indicated in the submission. In order to facilitate such a discussion, the reporting person should include a telephone number at which he or she can be contacted.

If the reporting person wishes to remain anonymous, they should clearly indicate this request for anonymity on the submission and should remove any items that may inadvertently disclose his or her identity. Should the reporting person report a matter anonymously, please include sufficient detail to allow the Independent Lead Director to understand their concerns, as it may be more difficult for Birchcliff to adequately investigate and resolve the matters specified in such report if the reporting person fails to provide sufficient detail.

If the issue or concern is related to any accounting, auditing or financial reporting matter, you should report it using the procedures outlined in Birchcliff's Whistleblower Policy.

Violations of the Code and Disciplinary Action

Violation of any of Birchcliff's policies, including this Code, may result in disciplinary action up to and including termination of your employment or business relationship with Birchcliff.

Compliance Procedures

This Code cannot, and is not intended to, address all of the situations you may encounter respecting appropriate business conduct and ethics. There will be occasions where you are confronted by circumstances not covered by this Code and where you must make a judgment as to the appropriate course of action. In those circumstances, you are encouraged to use your common sense and to contact your supervising executive officer or Birchcliff's General Counsel.

If you do not feel comfortable discussing the matter with your supervising executive officer or Birchcliff's General Counsel, please refer to *"Reporting Behaviour that Violates Rules"* in this Code to report the situation.

To monitor compliance with this Code, Workers may be periodically required to confirm that they have read, understand and are in compliance with this Code.

This Code was approved by the Board on November 14, 2024.