

POLICY ON THE PREVENTION AND PROCESSING OF HARASSMENT COMPLAINTS

1. PURPOSES OF THE POLICY

MIDLAND EXPLORATION INC. ("Midland") states that respect and dignity between people is a fundamental corporate value and it wishes to offer a harmonious workplace free of harassment to all of its employees, and an environment conducive to the achievement of its mission.

Midland considers that harassment in any form is likely to harm the dignity and physical or psychological integrity of the person affected by it. In Quebec, harassment is prohibited, whether directly or indirectly, by several statutes, including the *Charter of Human Rights and Freedoms*, the *Act respecting labour standards*, the *Civil Code of Québec* and the *Act respecting occupational health and safety*.

Accordingly, any manifestation of harassment toward persons who work at Midland, or who use our services or enter into a relationship with members of our personnel (employees and management staff), particularly as a supplier or subcontractor, is unacceptable and will be sanctioned. Therefore, each employee has the responsibility to contribute, by their conduct, to maintaining a harassment-free work environment. Furthermore, Midland is committed to taking reasonable measures to prevent harassment in the workplace, and to stop it when such a situation is brought to its attention.

2. SCOPE OF APPLICATION

This Policy applies to all of Midland's employees, regardless of their status, and to all the management personnel, including the senior management.

It applies to any conduct occurring in the workplace or outside work insofar as the person affected by it suffers a prejudice relating to their employment.

3. DEFINITIONS

For purposes of the application of this Policy, the expressions set out below are defined as follows:

"*Discriminatory Harassment*": harassment arising from any of the grounds listed in section 10 of the *Charter of Human Rights and Freedoms*, namely race, colour, sex, gender identity or expression, pregnancy, sexual orientation, civil status, age except as provided by law, religion, political convictions, language, ethnic or national origin, social condition, a handicap or the use of any means to palliate a handicap.

"*Employer*": Midland.

"*Harassment*": any form of harassment as defined in this Policy.

"*Policy*": this Policy.

"*Psychological Harassment*": any vexatious behaviour in the form of repeated and hostile or unwanted conduct, verbal comments, actions or gestures, that detrimentally affects a person's dignity or psychological or physical integrity, and that results in a harmful workplace or work environment for that person. For greater certainty, psychological harassment includes

such behaviour when expressed through such verbal comments, actions or gestures which are of a sexual nature. A single serious incidence of such behaviour that has a lasting harmful effect on an employee may also constitute psychological harassment.

4. EXAMPLES OF HARASSMENT

4.1 What could constitute harassment

Harassment may, among other things, take the form of:

- a) intimidation, threats, blackmail or coercion;
- b) repeated insinuations, baseless accusations, insults or humiliation, repeated attempts to exclude or isolate a person, yelling or shouting;
- c) systematic interference with normal work conditions and acts of nuisance in relation to the workplace, work environments or tools of work.

Sexual harassment may, among other things, take the form of:

- a) express or implied promises of rewards made for the purpose of obtaining agreement to a request of a sexual nature;
- b) express or implied threats of a reprisal, whether or not they are acted upon, made for the purpose of obtaining agreement to a request of a sexual nature, or made following a refusal to accede to such a request;
- c) remarks or behavior with a sexual connotation that can reasonably be perceived as creating a harmful work environment.

Harassment may occur between persons with different statuses or with the same status.

4.2 What does not constitute harassment

The normal exercise by the Employer of its management rights, including legitimate measures for allocating work, managing job performance, managing work attendance, or imposing disciplinary or administrative measures, do not constitute harassment. Similarly, conflicts between two persons, work-related stress or difficult professional constraints do not constitute harassment.

5. ROLES AND RESPONSIBILITIES

5.1 The management

The management undertakes, in particular, to:

- a) ensure the application of the Policy and that the personnel understand the Policy and comply therewith;
- b) take reasonable measures to prevent and stop any harassment;
- c) raise the awareness of and inform the employees with the goal of preventing harassment;
- d) provide the necessary support to any victim of harassment;
- e) intervene rapidly if any member of the personnel is witness to behavior which is risky or prohibited by the Policy;
- f) direct employees toward external resources, as needed, such as the employee assistance program;
- g) process with diligence, neutrality and impartiality any situation raised in the context of the informal or formal procedure set out in clauses 6 and 7 of the Policy;
- h) make the Policy available to all the employees and give them regular reminders of the existence and content thereof.

5.2 Employees

The employees are responsible, in particular, for:

- a) familiarizing themselves with the Policy;
- b) contributing, through their conduct, to making the workplace free of any harassment;
- c) acting at all times in a manner that is respectful, courteous and free of any physical or verbal violence;
- d) informing the Employer if they believe they have witnessed any conduct that is undesirable or prohibited by the Policy; and
- e) collaborating with the informal or formal procedure set out in clauses 6 and 7 of the Policy.

6. INFORMAL PROCEDURE

Where circumstances permit, any employee who considers that they have been the victim of psychological harassment should communicate directly with the person responsible for this conduct and demand that it cease.

Where the first step indicated above is not desirable, or if the harassment continues, an employee who believes they have been the victim of inappropriate or prohibited conduct under this Policy may submit the matter to the President of Midland and request that measures be taken to resolve the situation, in a confidential manner.

The matter may be submitted to mediation if the persons involved consent thereto in writing. The Employer may, as needed, retain the services of an external resource person or firm to assist the parties in finding a solution that is acceptable to everyone.

7. FORMAL PROCEDURE

If the employee who believes they have been a victim of inappropriate or prohibited conduct pursuant to this Policy does not wish to make use of the informal procedure, or the use thereof has failed to resolve the situation to everyone's satisfaction, then the employee in question may submit a written complaint to the President of Midland. The complaint must describe the nature of the impugned conduct as accurately as possible, including the date, time, place, circumstances, and any potential witnesses. An investigation shall then be undertaken as soon as possible, and a report submitted within a reasonable time period after the conclusion of the investigation.

The Employer may appoint an external resource person or firm to conduct the investigation.

The processing of complaints shall be kept confidential, except for any information that must be disclosed for the proper conduct of the investigation, and any limits provided for by law.

8. MEASURES IN CASE OF A BREACH OF THE POLICY

Any employee who contravenes this Policy may face administrative measures and disciplinary action, up to and including dismissal.

9. REPRISALS AND ABUSE OF THE POLICY

No employee who invokes this Policy in good faith, or provides information in connection with the application of the Policy, may be subject to any reprisals.

Any employee who makes use of this Policy in an abusive or frivolous manner, in bad faith, with intent to harm, or in an excessive and unreasonable manner, may face administrative measures and disciplinary action, up to and including dismissal.

10. REVISION OF POLICY

The Employer reserves the right to revise this Policy unilaterally, and at any time. All of the employees will be given notice, as soon as possible, of any amendments to the Policy.

11. EFFECTIVE DATE

This Policy shall take effect on January 1, 2019.

12. ACKNOWLEDGMENT BY EMPLOYEE

I, the undersigned, _____ acknowledge having received and read the Employer's Policy on the Prevention and Processing of Harassment Complaints. I hereby undertake to comply with and be governed by this Policy in all respects.

In witness whereof, I have signed in _____, on _____.

Signature of the employee

Signature of the President