

ROCKPOINT GAS STORAGE INC.

WHISTLEBLOWER POLICY

September 2025

Scope

This Whistleblower Policy (this “**Policy**”) applies to all directors, officers, employees and temporary workers¹ (“**you**” or “**Employees**”) of Rockpoint Gas Storage Inc. (“**Rockpoint**”) and its controlled subsidiaries, (“**we**,” “**us**,” “**our**” or the “**Company**”),

All Employees are required to comply with applicable whistleblowing laws and with the whistleblowing provisions set out in our Code of Business Conduct and Ethics (the “**Code**”). This Policy supplements the provisions set forth in the Code and is intended to raise awareness of our approach to whistleblowing among our Employees.

Former Employees can also raise whistleblowing concerns to Rockpoint, which will be handled in accordance with this Policy. Those individuals who raise whistleblowing concerns under this Policy will have the same protections from retaliation as Employees who raise concerns.

Purpose

The Company is committed to providing a mechanism for Employees to report suspected wrongdoing or dangers in relation to the activities of the Company and have those concerns addressed in a timely and confidential manner. In scenarios where one Employee suspects another Employee of wrongdoing, or has other concerns covered by the Code, that Employee should refer to this Policy and to the Code on the appropriate course of action. The aim of this Policy and the Code is to provide an internal mechanism for reporting, investigating and remedying suspected wrongdoing or dangers in relation to our activities.

Responsibilities

All Employees are responsible for ensuring this Policy and the procedures set forth herein are used correctly, in line with the expectations of the Company and in compliance with applicable legislation.

Whistleblowing Procedure

We are committed to conducting business with honesty and integrity and all staff are expected to maintain high standards and act in accordance with the Code.

Whistleblowing is the reporting of suspected wrongdoing or dangers in relation to the Company’s activities. This includes bribery, fraud or other criminal activity, miscarriages of justice, health and safety risks, damage to the environment, any breach (acts or omissions) of legal or professional obligations, complaints regarding accounting, internal accounting controls, auditing matters, discrimination, violence, harassment, unethical behaviour and any other matter detailed in the Code. Any suspected wrongdoing should be reported as soon as possible.

How to raise a whistleblowing concern

An Employee can raise a whistleblowing concern with any of the following:

¹ For purposes of this Policy, “**temporary workers**” includes non-full-time employees, volunteers, paid and unpaid trainees and consultants and contractors etc. that work on our premises.

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- their supervisor
 - our human resources team
 - our internal legal team
 - our reporting hotline (the “**Reporting Hotline**”)

The Reporting Hotline is managed by an independent third party. The Reporting Hotline allows anyone to call or submit a report online anonymously (if they so choose) in English or another language². The Reporting Hotline is available toll-free, 24 hours a day, 7 days a week. Refer to “Schedule A” to this Policy for information on how to use the Reporting Hotline to submit your report.

An Employee should raise a whistleblowing concern through any channel they feel comfortable using. If an Employee suspects that a conflict of interest may arise when raising a whistleblowing concern through a particular channel (or they are otherwise uncomfortable raising a whistleblowing concern through a particular channel), they should raise a whistleblowing concern through a different channel.

Providing as much information as possible will facilitate a review of a whistleblowing concern. Employees should not knowingly or maliciously provide false information in connection with a report.

Once an Employee has raised a whistleblowing concern, the Company will acknowledge receipt. If appropriate, where the Employee is not reporting anonymously, the Company will offer to meet with the Employee as soon as practicable. The Company will carry out a review and, where appropriate, consider whether the issue should be investigated further. Further investigation could be undertaken in several ways depending on the nature of the concern. This could include appointing a third party to lead the inquiry, or seeking further evidence and the accounts of witnesses. It can take time to properly investigate a whistleblowing concern. Where possible, the Company will inform the Employee of the outcome.

Confidentiality

The confidentiality of reports and the identity of whistleblowers will be maintained to the fullest extent possible, balancing the need to conduct an adequate review and subject to applicable laws. Employees may ensure their own anonymity by reporting through the Reporting Hotline³.

Reporting and Recording Process

The individual who receives an initial report must record its receipt and must document the concerns identified in the report, how the situation was dealt with, and file a report with our legal team to be retained for the record. The General Counsel will report all illegal and unethical conduct in violation of the Code to the Company’s Board of Directors, or to a committee thereof as appropriate, and externally in accordance with applicable laws.

² Subject to applicable laws restricting anonymous whistleblower reporting.

³ Subject to applicable laws restricting anonymous whistleblower reporting.

Communications with Government Authorities

Nothing in this Policy prohibits or restricts Employees or the Company in any way from providing information to a governmental authority, whether voluntarily or in response to a request, pursuant to applicable laws or regulations.

Zero Tolerance for Retaliation

Employees who raise a good faith whistleblowing concern or participate in an investigation in good faith must not suffer any form of retaliation or victimization as a result. We will treat very seriously any acts of victimization or retaliatory action taken against Employees who raise a whistleblowing concern and/or participate in a whistleblowing investigation. Any Employee who is found to have violated this provision will be subjected to disciplinary action under the Company's disciplinary procedure, including but not limited to termination. In addition, victimization or retaliation in these circumstances may be unlawful.

Employees who feel they are being or have been victimized or retaliated against for raising a whistleblowing concern or participating in an investigation should report this immediately to their supervisor, our human resources team or our internal legal team.

Inappropriate Reporting

We take all reports seriously. Reports made pursuant to this Policy which are fabricated, retaliatory, frivolous, malicious, or a practical joke may require disciplinary action up to and including termination.

Amendments

Management is responsible for reviewing this Policy on an annual basis to ensure consistency and compliance with applicable laws, the Code, and other Company policies.

SCHEDULE A

REPORTING HOTLINE

Our Reporting Hotline is operated by an independent third party, Lighthouse. The Reporting Hotline operates 24/7, 365 days a year via a toll-free phone line with North American coverage.

How do I submit a report?

- Call 1-866-860-0008. You will speak with a trained intake specialist who will ask you to provide details regarding the incident. They will ask if you choose to remain anonymous.
- The intake specialist will prepare a written report of the matter discussed. At the end of the call, they will provide you with a confidential report number ("**Report Number**"). You must not lose this Report Number as it is required to obtain any information about your report.
- The intake specialist will forward the report to a Rockpoint designate for review.
- The intake specialist will ask if you want to create an anonymous PIN (4 characters) to facilitate online communication with a Rockpoint designate.
- Creating a PIN will allow the Rockpoint designate to send follow up questions or provide a response to your report online at <https://www.lighthouserespond.com>. It will also allow you to anonymously report additional information and obtain status updates.
- Within 24 hours you will have online access to your account. You must login using both your PIN and Report Number.
- Alternatively, you can call 1-866-860-0008 to obtain status updates or add details to your report. The intake specialist will require your Report Number.