

	<h1>WHISTLEBLOWER POLICY</h1>		
PROCEDURE NUMBER: CIM0018	REV:	ORIGINAL ISSUE DATE: 02/15/22	REVISION DATE:
PREPARED BY: HUMAN RESOURCES	REVIEWED BY: HR, MANAGEMENT, AND LEGAL	APPROVED BY: VP HUMAN RESOURCES	APPROVED BY:

1.0 DEFINITION

A whistleblower as defined by this policy is an employee of Cimarron Energy Inc. (“Company”) who reports an activity that he/she considers to be illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

2.0 EXAMPLES

Examples of illegal or dishonest activities are violations of federal, state, or local laws; violations of Company policy; billing for services not performed or for goods not delivered; and other fraudulent financial reporting.

3.0 RESPONSIBILITY

If an employee has knowledge of or a concern of illegal or dishonest fraudulent activity, the employee is to contact his/her immediate supervisor or the Vice President of Human Resources. The employee must exercise sound judgment to avoid baseless allegations. An employee who intentionally files a false report of wrongdoing will be subject to discipline up to and including termination.

4.0 PROTECTION

Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. The Company will not retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments and threats of physical harm. Any whistleblower who believes he/she is being retaliated against must contact the Vice President of Human Resources immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

5.0 REPORTING AND INQUIRES

All reports of illegal and dishonest activities will be promptly submitted to the Vice President of Human Resources who is responsible for investigating and coordinating corrective action.

Employees with any questions regarding this policy should contact the Vice President of Human Resources.



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This Policy supersedes all prior policies and statements, whether verbal or written, regarding the subject matter contained herein. The Company reserves the right to change, amend, modify, or terminate this Policy at any time.