

		<h1>HUMAN RIGHTS POLICY</h1>		
<b>PROCEDURE NUMBER:</b> CIM0019	<b>REV:</b>	<b>ORIGINAL ISSUE DATE:</b> 02/15/22	<b>REVISION DATE:</b>	
<b>PREPARED BY:</b> HUMAN RESOURCES	<b>REVIEWED BY:</b> HR, MANAGEMENT, AND LEGAL	<b>APPROVED BY:</b> VP HUMAN RESOURCES	<b>APPROVED BY:</b>	

## 1.0 SCOPE

Cimarron Energy Inc. (“Company”) is committed to supporting internationally recognized human rights activities and initiatives. Respect for human rights is a core value of our business. We believe that long-term business success can only be achieved if human rights are acknowledged and protected. Our Human Rights Policy sets out the fundamental principles embedded in our business operations and culture to ensure we do not engage in activities that directly or indirectly violate human rights. It is our corporate responsibility to uphold these principles throughout our entire organization. Additionally, we expect all stakeholders, including business partners, vendors, and suppliers, to be aligned in upholding human rights globally. Our approach to human rights is based on:

- The United Nations Guiding Principles on Business and Human Rights
- The United Nations Universal Declaration of Human Rights

## 2.0 RESPONSIBILITY

The Company’s Board of Directors is responsible for reviewing and overseeing corporate responsibility policies and programs. The Company’s executive team, including the Chief Executive Officer, Head of Finance, and Vice President Human Resources oversees the implementation of these policies and coordinates our efforts to identify, address, train and report on our human rights risks and opportunities and foster a dialogue on these issues with employees and other stakeholders.

## 3.0 COMMITMENT

Our commitment is guided by the following principles:

### 3.1 ETHICAL BUSINESS CONDUCT

As detailed in our Code of Conduct, the Company is committed to the highest standards of business ethics which govern the conduct of our business operations for all employees. We require all business on behalf of the Company to be conducted with honesty and integrity in full compliance with all applicable laws and regulations.

### 3.2 EMPLOYEE RIGHTS AND FAIR LABOR PRACTICES

We believe all our employees deserve to be treated with integrity and respect. Therefore, we promote a work environment of transparency and trust. We compensate our employees competitively and operate in compliance with applicable wage, work hours, overtime and benefits laws and labor standards.



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### 3.3 DIVERSITY AND INCLUSION

We support and encourage diversity and inclusion within our business and the organizations with which we do business by maintaining workplaces that are free from discrimination or harassment based on race, sex, color, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification, political opinion or any other status protected by applicable law. We are committed to providing equal opportunities for all employees, eliminating all discriminatory practices, and promoting a work environment that is free from harassment, violence, and intimidation.

### 3.4 SAFE AND HEALTHY WORKPLACE

Our policy is to provide and maintain a safe, healthy, and productive workplace for all our employees that complies with all applicable laws, regulations, and internal policies.

### 3.5 FORCED LABOR AND HUMAN TRAFFICKING

We are committed to preventing and prohibiting forced labor of any kind, including all forms of modern-day slavery or human trafficking.

### 3.6 CHILD LABOR

We do not engage in or condone the unlawful employment or exploitation of children nor work with vendors that condone such labor practices.

## **4.0 INQUIRES**

For questions related to our Human Rights Policy Statement, please contact the Vice President of Human Resources.

**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.**