

## WHISTLEBLOWER POLICY STATEMENT 2021/2022



Document #	Effective Date	Next Rev Date	Department	Location	Rev #
COR-POL-002	2021	2022	QHSE	Echo ))) Drive	000

This Policy covers all ECHO Seismic work activities

The ECHO Seismic LTD. Corporate Whistleblower Policy describes the Corporation's principles and practices for the confidential, anonymous submission by officers and employees of concerns regarding the manner in which the Corporation conducts business. Including violations of law, rules, regulations, or the Company's "Code of Ethics and Professional Conduct, and concerns regarding accounting, internal accounting controls or auditing matters, as required under National Instrument 52-110 *Audit Committees*. The areas of concern potentially addressed and requiring reporting within the context of this Policy include, but are not limited to the following:

- Ethics Violations
- Laws and Regulatory Violations
- Environmental Damage (under reported or un-reported)
- Unfair Labor Practices
- Threats of Violence or Harassment
- Substance Abuse
- Theft of Company Property
- Embezzlement
- Securities Act Violations
- Fraud

This Policy covers each division (i.e. operating or administrative unit) of ECHO Seismic LTD. ("Echo" or "The Corporation", or "The Company"), including its subsidiaries.

Any officer or employee of the Corporation may submit, on a confidential, anonymous basis, any complaints, or concerns regarding the manner in which the Corporation conducts its business. Including violations of law, rules, regulations or the Corporate "Code of Ethics and Professional Conduct Policy, and concerns regarding accounting, internal accounting controls or auditing matters, using the contact information set out below.

Complaint or concerns regarding violations of law, rules, regulations or the "Code of Ethics and Professional Conduct Policy will be directed to the Audit Committee chair, as well as complaints or concerns regarding accounting, internal accounting controls or auditing matters.

Following the receipt of any complaint, the Audit Committee Chair, as appropriate, will investigate each matter reported and take corrective and disciplinary action, if appropriate, which may include, alone or in combination, a warning letter of reprimand, demotion, loss of merit increase, bonus or stock options, suspension without pay, or termination of employment.

The Audit Committee Chair may enlist other officers of the Corporation, Audit Committee members, the Board of Directors, or outside legal, accounting or other advisers, as appropriate, to conduct investigation of complaints made under this Policy. In conducting any investigation, all persons involved shall use reasonable efforts to protect the confidentiality and anonymity of the complainant.

Retaliation, victimization, or harassment of any kind against employees for complaints submitted under this Policy that are made in good faith will not be tolerated. Additionally, no employee shall be adversely affected because the employee refuses to carry out a directive that constitutes or would constitute a violation of law.

The Audit Committee Chair shall retain records of any such complaints or concerns for a period of not less than six years.


The Audit Committee Chair will report whistleblower complaints and concerns, if any, at each Audit Committee meeting.

Any officer or employee of the Corporation may submit, on a confidential, anonymous basis, complaints or concerns regarding the matters set out in this Policy by contacting the Audit Committee Chair by either:

Telephone: 403-294-6497

Email: [dmcgoey@matcocap.com](mailto:dmcgoey@matcocap.com)

You will be asked to provide details regarding the nature of the perceived contravention. Full disclosure regarding the complaint is required to ensure adequate and timely action is taken. The Audit Committee Chair guarantees your anonymity. No officer or employee of the Corporation or the service provider will know your identity unless you specifically disclose it.

  
Richard Habiak, President, and CEO  
ECHO Seismic LTD.

Sept. 17, 2021