



SEVEN GENERATIONS
E N E R G Y

DISCLOSURE, TRADING AND CONFIDENTIALITY POLICY

Section 1 Objective and Scope

The objectives of this Policy (the “**Objectives**”) are to ensure that:

- (a) the communications of Seven Generations Energy Ltd. (“**Seven Generations**” or the “**Company**”) with the public are timely, factual, accurate, adequately descriptive to meet both Seven Generations’ legal requirements and corporate interests and broadly disseminated in accordance with all applicable legal and regulatory requirements;
- (b) trading of Seven Generations’ securities by directors, officers, employees and individual consultants or contractors of Seven Generations and anyone else that qualifies as an “insider” under applicable corporate law (collectively, the “**Representatives**”) complies with applicable securities laws; and
- (c) information that is not publicly disclosed remains confidential.

This Policy documents the disclosure policies and practices of Seven Generations and aims to promote an understanding of the legal requirements applicable to the Representatives. It is also intended to assist the Chief Executive Officer and Chief Financial Officer of Seven Generations in making certifications with respect to the disclosure controls and procedures of Seven Generations required under National Instrument 52-109 – *Certification of Disclosure in Issuers’ Annual and Interim Filings* and to assist any director or officer of Seven Generations in the conduct of the reasonable investigation required to provide a defense to any action against such director or officer based on a misrepresentation or failure to make timely disclosure.

Section 2 Disclosure Committee

A Disclosure Committee comprised of the following individuals will be established on a case-by-case basis to review and approve the Company’s public disclosures:

- the Chief Executive Officer;
 - the Chief Financial Officer (for all public disclosures containing financial information based upon the Company’s financial statements, not previously released);
 - the General Counsel;
 - the Chair of the Audit Committee (for all public disclosures containing financial information based upon the Company’s financial statements, not previously released);
- and

- members of the executive team and other employees who have expertise in the areas covered by a particular disclosure, who are designated or confirmed by the Chief Executive Officer.

Granted Authority Matrix

Approval for release of information will generally require approval from the following individuals:

Level/Area of Responsibility	Primary	Designee if primary not available
1. Senior Executive	Chief Executive Officer	President or the Senior VP that is Responsible for Operations
2. Legal Counsel	General Counsel	Corporate Secretary or a representative from the Company’s legal department
3. Finance & Accounting (as applicable)	Chief Financial Officer	VP Accounting & Controller
4. Land & Agreement (as applicable)	Senior VP that is responsible for the Land department	Director of Land
5. Operations (as applicable)	Senior VP that is responsible for Operations	Director of Operations or Director of Facilities and Production
6. Investor Relations (as applicable)	Chief Financial Officer	VP, Capital Markets or VP, Corporate Planning

Notwithstanding the foregoing Granted Authority Matrix:

- with the approval of the CEO (or the President in his absence) and Legal Counsel, the Granted Authority Matrix can be overridden; and
- it is the intent of this Policy to ensure that all persons required to ensure that Seven Generations’ public disclosure meets the Objectives should be consulted and should sub-certify by providing their approval of the public disclosure prior to its release (confirmation by email to suffice). It is the responsibility of the individuals listed in the Granted Authority Matrix to ensure that sub-certifications are received from the other members of the Disclosure Committee or any other Representatives to the extent that their feedback or technical expertise is required to ensure that the public disclosure will meet the Objectives.

Mandate and Process

The mandate of the Disclosure Committee is attached as Appendix A to this Policy.

The Disclosure Committee has been established with the responsibility of overseeing Seven Generations’ disclosure practices. The Disclosure Committee will meet or converse as required and will maintain documentation of its activities. The Disclosure Committee shall have

the authority to retain experts, including lawyers, accountants, engineers and other persons, to assist the Disclosure Committee as it deems necessary.

It is essential that the members of the Disclosure Committee be kept fully apprised of all pending material developments concerning Seven Generations in order to evaluate and discuss those events and to determine the appropriateness and timing of the public release of information. If any Representative of Seven Generations becomes aware of any information which may constitute material information, he or she must promptly advise one of the members of the Disclosure Committee. If any Representative is unsure whether or not information is material, he or she should immediately contact a member of the Disclosure Committee before disclosing it to anyone. If it is deemed that material information should remain confidential, the Disclosure Committee will determine how that information will be controlled.

The Disclosure Committee will ensure that the Board is promptly and fully informed regarding potential disclosure issues facing Seven Generations as they may arise from time to time. This includes circumstances in which aspects of potentially material information or an underlying matter may not then be known or fully known, investigation or analysis of potentially material information or an underlying matter is incomplete or the impact or magnitude of potentially material information or an underlying matter remains to be fully determined.

All written public disclosures shall be circulated for review to all members of the Disclosure Committee and then approved in accordance with the Granted Authority Matrix, except in emergencies or special situations where the Granted Authority Matrix may be overridden, as described above. All such disclosures shall also be reviewed and approved by the Board or a committee of the Board, if required by law or this Policy. In any event, the following documents will be reviewed in whole or part by the appropriate committee of the Board and recommended to and approved by the Board or reviewed and approved by the Board:

- (a) annual and interim financial statements and related management's discussion and analysis of the operating and financial results and news releases describing or summarizing those statements and related MD&A;
- (b) information circulars for any meetings of shareholders;
- (c) annual information forms for Seven Generations, including all reserve disclosure mandated under National Instrument 51-101 - *Standards of Disclosure for Oil and Gas Activities* or other applicable securities laws or regulations; and
- (d) any take-over bid circulars, issuer bid circulars, director's circulars or rights offering circulars.

The Disclosure Committee will recommend changes to this Policy as needed to comply with changing regulatory requirements.

Press Release Review Protocol

Generally, the strategic direction of Seven Generations and other matters that are within the scope of the Mandate of the Board, including the approval of corporate budgets and major

corporate transactions and initiatives, will be approved by the Board and the corresponding press releases (and material change reports, if required) will be within the purview of Management and subject to review by the Disclosure Committee and approval pursuant to the Granted Authority Matrix (as described above).

Press releases pertaining to the annual and interim financial statements and related MD&A, information circulars, annual information forms, take-over bid circulars, director's circulars, rights offering circulars, plans of arrangement or other substantial corporate transactions will be distributed to the Board in draft form for review prior to public dissemination. All other press releases will be distributed to the Board concurrent with their issuance.

Section 3 Determining Materiality

Material information is any information relating to the business and affairs of Seven Generations that results in, or would reasonably be expected to result in, a significant change in the market price or value of Seven Generations' listed securities, or that would reasonably be expected to have a significant influence on a reasonable investor's investment decisions.

Set forth below are examples of types of events or information which may be material. This list is not exhaustive and any questions concerning the materiality of an issue should be directed to a member of the Disclosure Committee.

Changes in Corporate Structure

- changes in share ownership that may affect control of Seven Generations
- major reorganizations, amalgamations or mergers
- take-over bids, issuer bids or insider bids

Changes in Capital Structure

- the public or private sale of additional securities
- planned repurchases or redemptions of securities
- planned splits of common shares or offerings of warrants or rights to buy shares
- any share consolidation, share exchange or stock dividend
- changes in Seven Generations' dividend payments or policies
- the possible initiation of a proxy fight
- material modifications to rights of security holders

Changes in Financial Results

- a significant increase or decrease in near-term earnings prospects
- unexpected changes in the financial results for any periods
- shifts in financial circumstances, such as cash flow reductions, major asset write-offs or write-downs
- changes in the value or composition of Seven Generations' assets
- any material change in Seven Generations' accounting policy

Changes in Business and Operations

- any development that affects Seven Generations' resources, technology, products or markets
- a significant change in capital investment plans or corporate objectives
- major labour disputes or disputes with major contactors or suppliers
- significant new contracts, products, patents, or services or significant losses of contracts or business
- significant discoveries
- changes to the Board or executive management
- the commencement of, or developments in, material legal proceedings or regulatory matters
- waivers of corporate ethics and conduct rules for officers, directors, and other key employees
- any notice that reliance on a prior audit is no longer permissible
- de-listing of Seven Generations' securities or their movement from one quotation system or exchange to another

Acquisitions and Dispositions

- significant acquisitions or dispositions of assets, property or joint venture interests
- acquisitions of other companies, including a take-over bid for, or merger with, another company

Changes in Credit Arrangements

- the borrowing or lending of a significant amount of money
- any mortgaging or encumbering of Seven Generations' assets
- defaults under debt obligations, agreements to restructure debt, or planned enforcement procedures by a bank or other creditors
- changes in rating agency decisions
- significant new credit arrangements

It is the Disclosure Committee's responsibility to determine what information is material in the context of Seven Generations' affairs. The Disclosure Committee must take into account a number of factors in making judgments concerning the materiality of information. Factors include the nature of the information itself, the volatility of Seven Generations' securities and prevailing market conditions. Seven Generations will also monitor market reaction to disclosures of information and use such reactions to aid in future materiality determinations.

In complying with the requirement to disclose material information under applicable laws and stock exchange rules, Seven Generations will adhere to the following basic disclosure principles:

- (a) subject to certain exceptions, material information will be publicly disclosed immediately via news release;

- (b) disclosure will include any information, the omission of which would make the rest of the disclosure misleading, and will provide sufficient detail to permit investors to appreciate the substance and importance of the information;
- (c) disclosure of material information will be factual and balanced, neither over-emphasizing favourable news nor under-emphasizing unfavourable news. Unfavourable information will be disclosed just as promptly and completely as favourable information;
- (d) selective disclosure is not acceptable. If previously undisclosed material information has been inadvertently disclosed to any person who is not bound by an express confidentiality obligation, such information will be broadly disclosed immediately via news release. Disclosure made to analysts cannot be protected by a confidentiality agreement;
- (e) if material information that is not in the public domain is to be announced at an analyst or shareholder meeting or a news conference, its announcement must be co-ordinated with a general public announcement by news release;
- (f) derivative information (which is information extracted from a document filed on behalf of another person or company) which is included in a document or oral statement should include a reference identifying the document that was the source of the information;
- (g) dissemination of information via Seven Generations' website alone does not constitute adequate disclosure of material information; and
- (h) disclosure must be corrected immediately if it is subsequently discovered that earlier disclosure contained a material error at the time it was given.

Section 4 Disclosure Controls and Procedures

The Disclosure Committee shall establish specific procedures and timetables which shall be adhered to by Seven Generations and its Representatives for the preparation of all public disclosure, and, wherever practicable, their review by such personnel, the auditors and external legal counsel, as the Disclosure Committee may determine and, ultimately their dissemination in compliance with this Policy. In addition to reviewing all public disclosure, the Disclosure Committee may employ questionnaires to directors and officers, formal or informal due diligence sessions, certifications of officers and involvement of experts. The Disclosure Committee may elect to, at any time, adopt controls and procedures that are different than those which have been previously established, provided that such controls and procedures are, in the opinion of the Disclosure Committee, satisfactory to ensure that public disclosure is disclosed in compliance with this Policy.

The disclosure controls and procedures will involve the following:

- (a) identification of all continuous disclosure requirements under securities laws, rules and policies applicable to Seven Generations;

- (b) identification of the individuals responsible for preparing reportable information and individuals, whether internal or external, responsible for reviewing reports or portions of reports to verify disclosure made with respect to their areas of responsibility or expertise;
- (c) establishment of timetables for the preparation and adequate review of reportable information;
- (d) procedures for obtaining “sign-off” on disclosure of reportable information and receipt of written consents from all experts whose reports are included or referred to in any disclosure;
- (e) procedures for the identification and timely reporting to the Disclosure Committee of information which may constitute material information or which may constitute a material change to previously disclosed material information, including the identification of individuals who are likely to learn first about events outside the control of Seven Generations that may give rise to material information;
- (f) procedures for the identification and reporting to the Audit and Finance Committee of the Board of any fraud, whether or not material, that involves management or other employees or contractors who have a significant role in Seven Generations’ internal controls;
- (g) a policy on how Seven Generations will receive, document, evaluate and respond to complaints or concerns received from internal or external sources regarding financial reporting or other disclosure issues;
- (h) ensuring the procedures are followed with respect to the release of each disclosure made in writing and for the review of any disclosure made orally; and
- (i) ongoing evaluation of Seven Generations’ disclosure controls and procedures.

Section 5 Trading Restrictions

It is illegal for any Representative or any other person or company in a special relationship with Seven Generations with knowledge of material information affecting Seven Generations that has not been generally disclosed to purchase or sell securities of Seven Generations until such information has been generally disclosed and a reasonable period of time has passed since dissemination of such information to the public. It is also illegal for anyone to inform any other person of material information that has not been generally disclosed (“**tipping**”), except in the necessary course of business. There are serious sanctions for failure to comply with regulatory requirements in these matters, including substantial fines and potential jail sentences of up to 10 years for insider trading and up to 5 years for tipping.

Therefore, Representatives and any person or company in a special relationship with Seven Generations with knowledge of confidential material information about Seven Generations, counterparties in negotiations of potentially material transactions or any other public company are prohibited from trading securities of Seven Generations, any counterparty

or such other public company, as applicable, until the information has been fully disclosed and a reasonable period has passed for the information to be widely disseminated.

Section 6 Pre-Clearance of Trades

In addition to the regular trading restriction, directors and officers are required to provide prior notification of any trade in Seven Generations' securities, including the exercise of options or other share rights, to the Chief Executive Officer, the President and Chief Operating Officer or the Chief Financial Officer, and to either the Corporate Secretary or General Counsel, before engaging in any such trade. The director or officer must await pre-clearance from either the Corporate Secretary or General Counsel before engaging in the trade, which pre-clearance will be provided promptly following the receipt of such notification, unless a trading blackout is in effect or is imminent under Section 7 of this Policy.

Section 7 Blackout Periods

Trading blackouts are periods of time when certain directors, officers, employees and other Representatives shall be prohibited from engaging in any transactions involving securities of Seven Generations, including common shares, notes, options, performance warrants, restricted share units ("RSUs"), performance share units ("PSUs"), deferred share units ("DSUs") and any other securities that are exchangeable for or into securities of Seven Generations, as well as any exchange-traded options or derivative securities that are not issued by Seven Generations but are based upon securities of Seven Generations. Trading blackouts do not restrict automatic purchases of common shares of Seven Generations that are made on an employee's behalf in accordance with the employee's previously issued instructions under Seven Generations' employee savings plan (including into a tax-free savings account), but they do restrict employees from changing their instructions under the employee savings plan (including those pertaining to a tax-free savings account), or from selling or transferring any securities of Seven Generations that have been acquired under the employee savings plan, while the trading blackout remains in effect.

Quarterly trading blackout periods will apply to all directors, officers and employees of Seven Generations, as well as any other Representatives of Seven Generations that are in a position to know of the financial results or any material operating results of Seven Generations during periods when financial statements are being prepared but results have not yet been publicly disclosed. Quarterly trading blackouts will commence ten (10) days following the end of a financial quarter and will cease at the end of the first full trading day following the issuance of a news release disclosing such quarterly financial or operating results (for example, if such news release is issued before markets open, then the blackout will expire after markets close that same day, and if such news release is issued during trading hours, then the blackout will expire after markets close the day after the news release was issued).

Trading blackout periods may also be prescribed from time to time by the Disclosure Committee as a result of special circumstances relating to Seven Generations when directors, officers and certain other Representatives will be precluded from trading in its securities. All parties with knowledge of such special circumstances should be covered by the blackout. These parties may include external advisors such as legal counsel, investment bankers and other professional advisors, and counterparties in negotiations of material potential transactions. The

fact that a trading blackout has been imposed should not be discussed with other parties. For confidentiality purposes, the Disclosure Committee may determine that the reasons for the blackout are not to be given. In extraordinary circumstances, the Disclosure Committee may grant a waiver of the blackout period to a Representative.

In addition, in connection with a take-over bid, issuer bid, prospectus distribution, restricted private placement (being a private placement made pursuant to sections 2.3 or 2.30 of National Instrument 45-106 - *Prospectus and Registration Exemptions*), amalgamation, arrangement, capital reorganization or similar transaction (a "**Restricted Event**"), no Issuer Restricted Person (as defined below) shall bid for or purchase a Restricted Security (as defined below) for their own account or for an account over which they exercise control or direction or attempt to induce or cause any person or company to purchase a Restricted Security, except in connection with:

- (a) the exercise of an option, right, warrant or similar contractual arrangement held or entered into by the Issuer Restricted Person prior to the Restricted Period (as defined below);
- (b) an issuer bid described in applicable securities legislation if the reporting issuer did not solicit the sale of securities sold under those clauses;
- (c) the solicitation of the tender of securities to a securities exchange take-over bid or issuer bid; or
- (d) a subscription for or purchase of the Restricted Security pursuant to the prospectus distribution or restricted private placement.

"Issuer Restricted Person" means: Seven Generations; a selling securityholder of the Restricted Security in connection with a prospectus distribution or restricted private placement; an affiliated, associated entity or Insider of Seven Generations; or any person or company acting jointly or in concert with any of the foregoing.

A "**Restricted Security**" for this purpose is a security that trades on a marketplace or a market where there is mandated transparency of orders or trade information that is of the class of security that: (a) is offered pursuant to the prospectus distribution or restricted private placement; (b) is offered by an offeror in a securities exchange take-over bid; (c) is offered by an issuer in an issuer bid; or (d) would be issuable pursuant to an amalgamation, arrangement, capital reorganization or similar transaction in relation to which proxies are solicited from securityholders that will receive the Restricted Security in such circumstances that the issuance would be an exemption from prospectus requirements in accordance with applicable securities legislation (an "**Offered Security**"), and includes: (i) a security into which the Restricted Security is immediately convertible, exchangeable or exercisable unless the security is a listed security or quoted security and the price at which the Restricted Security is convertible, exchangeable or exercisable is greater than 110% of the best ask price of the security at the commencement of the Restricted Period; (ii) a security of the issuer of the Restricted Security or another issuer that, according to the terms of the Restricted Security, may significantly determine the value of the Restricted Security; (iii) if the Restricted Security is a special warrant, the security which would

be issued on the exercise of the special warrant; and (iv) if the Restricted Security is an equity security, any other equity security of the issuer.

These restrictions shall apply:

- (a) in connection with a prospectus distribution or restricted private placement, commencing on the date that is two trading days prior to the day the offering price of the Offered Security is determined and ending on the date that the selling process in respect of the offering ends and all stabilizations relating to the Offered Security are terminated;
- (b) in connection with a securities exchange take-over bid or issuer bid, commencing on the date of the dissemination of the take-over bid circular, issuer bid circular or similar document for such transaction and ending with the termination of the period during which the securities may be deposited under the bid, including any extension thereof, or the withdrawal of the bid; and
- (c) in connection with an amalgamation, arrangement, capital reorganization or other similar transaction, commencing on the date that the information circular for such transaction is disseminated and ending on the date of approval of the transaction by securityholders that will receive the Offered Security or the termination of the transaction by the issuer or issuers,

(each a “**Restricted Period**”).

A member of the Disclosure Committee should be consulted if there is any question as to when these restrictions shall have ceased to apply in any particular circumstance. Legal Counsel shall be consulted prior to any discussions, written or otherwise, with any stakeholder.

Section 8 Short Sales, Puts, Calls and Options

Seven Generations’ securities should be purchased for investment purposes only. Transactions that could be perceived as speculative or influenced by positive or negative perceptions of Seven Generations’ prospects, including through the use of puts, calls, collars, spread bets, contracts for difference and hedging transactions are not in Seven Generations’ best interests and must be avoided. In particular, Representatives are prohibited from, directly or indirectly:

- (a) purchasing Seven Generations securities with the intention of reselling them within six months or selling Seven Generations securities with the intention of buying them within six months, other than the sale of Seven Generations securities shortly after they were acquired through the exercise of options granted under Seven Generations’ stock option plan, performance warrants or any other share-based compensation;
- (b) selling Seven Generations securities that are not owned or fully paid for at the time of sale, unless such Representative owns other securities convertible into such securities or options or rights to acquire such securities sold and within ten (10)

days after the sale, such person or company: (i) exercises the conversion privileges, options or rights and delivers the securities so associated to the purchaser and the number of securities acquired on such exercise equals or exceeds the number of securities sold; or (ii) transfers the convertible securities, options or rights, if transferable to the purchaser;

- (c) selling a “call” on Seven Generations securities (i.e. giving someone else the right to buy your Seven Generations securities at a pre-established price on a later date) or buying a “put” on Seven Generations securities (i.e. acquiring the right to sell your Seven Generations securities to someone else at a pre-established price on a later date);
- (d) engaging in hedging activities of any kind respecting Seven Generations securities or Related Financial Instruments; and
- (e) offering up shares or any other securities of Seven Generations as consideration in a bet or wager of any kind.

“Related Financial Instrument” means: (i) an instrument, agreement, security or exchange contract that derives or bases its value, market price or payment obligations on the value, market price or payment obligations of a Seven Generations security; (ii) any other instrument, agreement or understanding that affects, directly or indirectly, a person’s economic interest in a Seven Generations security; and (iii) any agreement, arrangement or understanding that affects the extent to which the person’s economic or financial interests are aligned with those of Seven Generations.

Section 9 Insider Trading Reports

Subject to certain exemptions and alternate reporting requirements set forth in applicable securities legislation, Reporting Insiders (as defined below) are required to file insider trading reports using the System for Electronic Disclosure by Insiders at www.sedi.ca within five (5) days of a change in their ownership position in any securities of Seven Generations. This includes purchases or sales of common shares, the grant of options or other convertible securities (e.g. PSUs, RSUs or DSUs) to such persons or the exercise, redemption or conversion by them of such options or convertible securities, as well as any sales or transfers of common shares acquired by such persons under Seven Generation’s employee savings plan; however, automatic purchases under the employee savings plan need only be reported by such persons once per calendar year (before the end of March for the preceding calendar year). Such persons are also required to file an initial insider report within ten (10) days of the date on which the person became a Reporting Insider of Seven Generations (an initial report is not required, however, when a person becomes a Reporting Insider if he/she has no direct or indirect beneficial ownership, control or direction over securities of Seven Generations). If a person falls into one of these categories, that person likely will be required to file insider trading reports in other provinces and should consult a member of the Disclosure Committee as soon as possible whenever the individual trades securities to confirm his/her statutory obligations.

“Reporting Insider” means: (i) the directors and senior officers of Seven Generations; (ii) a person or company that has beneficial ownership of, or control and direction over, whether

direct or indirect, or a combination of beneficial ownership of, and control or direction over, whether direct or indirect, securities of Seven Generations carrying more than 10% of the voting rights attached to all of Seven Generations' outstanding securities (excluding, for the purpose of the calculation of the percentage held, any securities held by the person or company as underwriter in the course of a distribution but including, for the purpose of the calculation of the percentage held, the person or company's post-conversion beneficial ownership of Seven Generation's securities) or a director or officer thereof; (iii) Seven Generations itself if it has purchased, redeemed or otherwise acquired a security of its own issue, for so long as it continues to hold that security; or (iv) any other insider that in the ordinary course receives or has access to information as to material facts or material changes concerning Seven Generations before the material facts or material changes are generally disclosed and directly or indirectly, exercises, or has the ability to exercise, significant power or influence over the business, operations, capital or development of Seven Generations.

It is the responsibility of the particular Reporting Insider to file their insider trading reports as required. This responsibility applies whether or not the Reporting Insider files the report themselves or relies upon some third party (including Seven Generations) to do so.

Section 10 Special Relationship

Under applicable securities laws, a person in a special relationship with a public issuer is prohibited from trading in securities of that public issuer. From time to time Seven Generations may be considered to be in a special relationship with other public issuers as a result of receiving confidential information in connection with potential mergers, acquisitions or significant asset purchases or sales. Representatives of Seven Generations may also be considered to be in a special relationship and may not trade in securities of such public issuers once they have any knowledge relating to such public issuer as a result of Seven Generations having a special relationship with such public issuer. In addition, the Board considers it inappropriate for any Representative of Seven Generations to trade in the securities of any public issuer based upon information obtained, whether from public or confidential sources, while Seven Generations is considering a merger, acquisition or significant asset purchase or sale with such public issuer.

Section 11 Maintaining Confidentiality

Any Representative privy to confidential information relating to Seven Generations is prohibited from communicating such information to anyone else, other than in the necessary course of business. Efforts will be made to limit access to confidential information to only those who need to know the information and those persons will be advised that the information is to be kept confidential.

Outside parties privy to undisclosed material information concerning Seven Generations must be told that they must not divulge such information to anyone else, other than in the necessary course of business and with the consent of a duly authorized representative of Seven Generations, and that they may not trade in Seven Generations' securities until the information is publicly disclosed.

To prevent the misuse or inadvertent disclosure of material information relating to Seven Generations, the following procedures should be observed at all times:

- (a) documents and files containing confidential information should be kept in a safe place, with access restricted to individuals who “need to know” that information in the necessary course of business. Code names should be used if necessary;
- (b) confidential matters should not be discussed in places where the discussion may be overheard, such as elevators, hallways, restaurants, airplanes or taxis;
- (c) confidential documents should not be read or displayed in public places and should not be discarded where others can retrieve them;
- (d) Representatives must ensure they maintain the confidentiality of information in their possession outside of the office as well as inside the office;
- (e) transmission of documents by electronic means, such as by fax, e-mail or directly from one computer to another, should be made only where it is reasonable to believe that the transmission can be made and received under secure conditions;
- (f) unnecessary copying of confidential documents should be avoided and documents containing confidential information should be promptly removed from conference rooms and work areas after meetings have concluded. Extra copies of confidential documents should be shredded or otherwise destroyed; and
- (g) access to confidential electronic data should be restricted through the use of passwords.

Section 12 Confidential Material Information

In certain circumstances, the Disclosure Committee may determine that disclosure of certain information would be unduly detrimental to Seven Generations (for example, if releasing the information would prejudice negotiations in a corporate transaction), in which case, the information will be kept confidential until the Disclosure Committee, with the advice of legal counsel, determines it is appropriate to publicly disclose. In such circumstances, the Disclosure Committee will cause a confidential material change report to be filed with the applicable securities regulators and will periodically (at least every ten (10) calendar days) review its decision to keep the information confidential. In addition, the Disclosure Committee will inform the Board of its decision.

Where disclosure of a material change is delayed, Seven Generations must maintain complete confidentiality. During the period before a material change is disclosed, market activity in Seven Generations’ securities should be carefully monitored. Any unusual market activity may mean that news of the matter has been leaked and that certain persons are taking advantage of it. If the confidential material change, or rumors about it, has leaked or appears to be impacting the price of the securities, Seven Generations should immediately take steps to ensure that a full public announcement is made. This would include contacting the relevant stock exchange and asking that trading be halted pending the issuance of a news release.

Where a material change is being kept confidential, persons with knowledge of the material change may not use such information in purchasing or selling securities of Seven

Generations. Such information should not be disclosed to any person or company, except in the necessary course of business. If Seven Generations discloses material information under the “necessary course of business” exception, it should make sure that those receiving the information understand that they are now in a special relationship with Seven Generations and cannot pass the information on to anyone else (other than in the “necessary course of business” and with the consent of a duly authorized representative of Seven Generations), or trade on the information, until it has been generally disclosed. Seven Generations should secure the recipient’s express undertaking (either orally or in writing) not to disclose the information or trade in Seven Generations’ securities. In such circumstances, the feasibility of having such parties enter into a confidentiality agreement with Seven Generations should be considered.

Section 13 Designated Spokespersons

Seven Generations will designate certain spokespersons responsible for communication with the investment community, regulators and the media. Those spokespersons may, from time to time, designate others within Seven Generations to speak on behalf of Seven Generations as back-ups or to respond to specific inquiries.

Representatives who are not authorized spokespersons must not respond under any circumstances to inquiries from the investment community, the media or others, unless specifically asked to do so by a designated spokesperson. All such inquiries should be referred to one of the designated spokespersons.

Section 14 Disclosure Record

Seven Generations will maintain a file containing all known public information about Seven Generations, including news releases, analysts’ reports and relevant newspaper articles from major publications.

The minimum retention period for material corporate information posted on the website shall be one year. Specifically, news releases shall be kept for a period of one year, quarterly and annual reports for two years.

Section 15 News Releases

Once the Disclosure Committee determines that a development is material, it will authorize the issuance of a news release, unless the Disclosure Committee determines that such development should remain confidential for a period of time, in which case appropriate confidential filings will be made and controls of that undisclosed material information will be instituted. Should undisclosed material information be inadvertently disclosed on a selective basis, Seven Generations will issue a news release as soon as practicable in order to fully disclose that information. Pending the public release of any such material information, the parties who have knowledge of the information should be advised that the information is material and has not been generally disclosed.

If any stock exchange upon which Seven Generations’ securities are listed is open for trading at the time of a proposed announcement, Seven Generations will endeavour to provide prior notice of a news release announcing material information to the market surveillance

division of any such exchange to enable market surveillance to determine if a trading halt is in order. If a news release announcing material information is issued outside of trading hours, Seven Generations will endeavour to provide notice to market surveillance before trading opens on the next trading day.

Financial outlooks and future oriented financial information (each as defined in National Instrument 51-102 – *Continuous Disclosure Obligations* (“**NI 51-102**”)) and news releases containing financial information based on Seven Generations’ financial statements prior to the release of such statements will be reviewed by the Board or the Audit and Finance Committee prior to issuance. Annual and interim financial results will be publicly released as soon as practicable following Board or committee approval of the applicable news release and related financial statements.

News releases will be disseminated through an approved news wire service that provides simultaneous national distribution. News releases will also be posted on Seven Generations’ website after release over the news wire.

Section 16 Conference Calls

Conference calls may be held to enable management to discuss quarterly financial results and major corporate developments. Conference calls shall be simultaneously accessible to all interested parties, whether they actively participate by telephone, or merely listen in by telephone or through an Internet webcast. Each such call will be preceded by a news release setting out relevant material information. At the beginning of the call, a spokesperson of Seven Generations will provide appropriate cautionary language respecting any forward-looking information, and will direct participants to publicly available documents containing the assumptions, sensitivities and a full discussion of the risks and uncertainties. In advance of a conference call or industry conference, to the extent practicable, Seven Generations will endeavour to script comments and responses to anticipated questions to identify material information that should be publicly disclosed and will limit comments and responses to non-material information and material information that has previously been publicly disclosed.

Seven Generations will provide advance notice of any conference call and webcast by issuing a news release announcing the date and time and providing information on how interested parties may access the call and webcast. In addition, Seven Generations may invite analysts, institutional investors, the media and other interested parties to participate. A tape recording, an archived audio webcast or a transcript of the conference call will be made available for a minimum of 72 hours following the call.

The Disclosure Committee may hold a debriefing meeting immediately after the conference call or industry conference, as applicable, and, if such debriefing uncovers selective disclosure of previously undisclosed material information, Seven Generations will immediately disclose such information broadly via news release.

Section 17 Rumours

Seven Generations does not comment, affirmatively or negatively, on rumours. Seven Generations’ spokespersons will respond consistently to any rumours with the following comment: “It is our policy not to comment on market rumours or speculation.”

Should the stock exchange on which Seven Generations' securities are listed request that Seven Generations make a definitive statement in response to a market rumour that is causing significant volatility in the securities of Seven Generations, the Disclosure Committee will consider the matter and decide whether to make a policy exception. If the rumour is true, in whole or in part, Seven Generations will immediately issue a news release disclosing the relevant information.

Section 18 Contact with Analysts and the Investment Community

Seven Generations recognizes that analysts are important conduits for disseminating corporate information to the investing public and that analysts play a key role in interpreting and clarifying existing public data and in providing investors with background information and details that cannot practically be put in public documents. However, Seven Generations also recognizes that analyst disclosure does not constitute adequate disclosure of information that is considered material information required to be disclosed. Seven Generations will meet with analysts and investors on an individual or small group basis as needed and will initiate contacts or respond to analyst and investor calls in a timely, consistent and accurate fashion in accordance with this Policy.

Disclosure in individual or group meetings also does not constitute adequate disclosure of information that is considered to be undisclosed material information. If Seven Generations intends to announce material information at an analyst or shareholder meeting, at an investor conference or on a conference call, the announcement must be preceded by a news release. Material prepared for any such meetings should be circulated for review to all members of the Disclosure Committee prior to the meeting with a view to eliminating inadvertent selective disclosure and verifying the accuracy of any such materials.

Seven Generations will provide only non-material information through individual and group meetings, in addition to regular publicly disclosed information. Seven Generations cannot alter the materiality of information by breaking down the information into smaller, non-material components.

The following policies apply to contacts with analysts and the investment community:

- (a) Seven Generations will respond to inquiries in a timely, consistent and accurate fashion in accordance with this Policy. These responses will avoid selective disclosure of non-public material information;
- (b) it is Seven Generations' policy to review, upon request, draft research reports or models of analysts. Seven Generations will review the report or model for the purpose of pointing out errors in factual content only based on publicly disclosed information. Seven Generations will limit its comments in responding to such inquiries to non-material information. Seven Generations will not confirm, or attempt to influence, an analyst's opinions or conclusions and will not express comfort with the analyst's model and earnings estimates. So as not to endorse an analyst's report or model, Seven Generations will provide its comments orally or will attach a disclaimer to written comments to indicate the report was reviewed

only for factual accuracy. The Disclosure Committee or its designate will have responsibility for reviewing analysts' reports;

- (c) Seven Generations will try to ensure that analysts' estimates are in line with Seven Generations' own expectations, through regular and timely public dissemination of quantitative and qualitative information; and
- (d) where practicable, more than one Seven Generations representative will be present at a meeting with members of the investment community so as to reduce risks related to inadvertent selective disclosure of non-public material information.

Analyst reports are proprietary products of the analyst's firm. Re-circulating a report by an analyst may be viewed as an endorsement by Seven Generations of the report. For these reasons, Seven Generations will not provide analyst reports through any means to persons outside of Seven Generations, including posting such information on its website. Seven Generations may post on its website a complete list, regardless of the recommendation, of all the investment firms and analysts who provide research coverage on Seven Generations. If provided, such list will not include links to any analyst's, their firm's or any other third party websites or publications. Seven Generations may distribute analyst reports internally, to directors and senior officers, and to Seven Generations' financial and professional advisors.

Spokespersons should keep notes of telephone conversations with analysts and investors. A debriefing should be held after such meetings and if such debriefing uncovers selective disclosure of previously undisclosed material information, Seven Generations will immediately disclose such information broadly via a news release.

Section 19 Forward-Looking Information

Should Seven Generations elect to disclose forward-looking information ("FLI") in continuous disclosure documents, speeches, conference calls, etc., the following guidelines will be observed:

- (a) the information, if deemed material, will be broadly disseminated in accordance with this Policy;
- (b) the information will be published only if there is a reasonable basis for drawing the conclusions or making the forecast and projections and will be clearly identified as forward-looking;
- (c) Seven Generations will identify material assumptions used in the preparation of the FLI;
- (d) Seven Generations will disclose in its management's discussion and analysis ("MD&A"), events and circumstances that occurred during the period to which the MD&A relates that are reasonably likely to cause actual results to differ materially from material FLI for a period that is not yet complete that Seven Generations previously disclosed to the public, and the expected differences or, to the extent such differences were disclosed in a news release filed prior to the filing of the

MD&A, Seven Generations will include the prescribed reference to such news release in its MD&A;

- (e) the information will be accompanied by meaningful cautionary statements and statements proximate to such information that identifies, in specific terms, the risks and uncertainties that may cause the actual results to differ materially from those projected in the statement, which may include a sensitivity analysis to indicate the extent to which different business conditions from the underlying assumptions may affect the actual outcome;
- (f) public oral statements also require a cautionary statement that actual results could differ materially and a reference to material factors and assumptions that could cause actual results to differ materially and that such factors or assumptions are contained in a readily available document; and
- (g) the information will be accompanied by a statement that disclaims Seven Generations' intention or obligation to update or revise the FLI, whether as a result of new information, future events or otherwise, other than as required by law. Notwithstanding this disclaimer, should subsequent events prove past statements about current trends to be materially off target, Seven Generations may issue a news release explaining the reasons for the difference; in such cases, Seven Generations will update its guidance on the anticipated impact on production and dividends (or other key metrics).

If Seven Generations issues future orientated financial information or a financial outlook covered by NI 51-102, or a successor instrument thereto, Seven Generations will ensure that such disclosure is reviewed by the Board or the Audit and Finance Committee, if required, in advance of its public release and that:

- (a) it is based on assumptions that are reasonable in the circumstances and is limited to a period for which such information can be reasonably estimated;
- (b) it is based on the accounting principles used by Seven Generations;
- (c) it includes the date management approved the materials; and
- (d) it explains the purpose of the disclosure and cautions readers that the information may not be appropriate for other purposes.

Section 20 Correcting Disclosure

Any Representative of Seven Generations who believes that any public disclosure of Seven Generations, including any documents released by Seven Generations or any public oral statements, contains a misrepresentation in any material respect (by omission or otherwise) shall promptly notify a member of the Disclosure Committee of such misrepresentation, and such member shall inform the Board and take appropriate steps to correct such misrepresentation promptly, and in any event within two (2) business days. In addition, any Representative who

has concerns about whether or not information is undisclosed material information, should contact a member of the Disclosure Committee in respect of such matter.

Section 21 Quiet Periods

In order to avoid the potential for selective disclosure, or the perception or appearance of selective disclosure, Seven Generations will observe quiet periods prior to the announcement of quarterly financial or operating results or when material changes are pending. During a quiet period, Seven Generations will not initiate meetings or telephone contacts with analysts and investors and no guidance or comments with respect to financial or operations results for the recently completed reporting period or the pending material change, as applicable, will be provided to anyone, other than responding to unsolicited inquiries concerning publicly available or non-material information. The quiet period commences on the date of the financial quarter end and ceases on the day of a news release disclosing such quarterly financial or operating results.

Additional quiet periods may be established from time to time by Seven Generations as a result of special circumstances relating to Seven Generations. The existence of a special purpose quiet period will be communicated by a means approved by the Disclosure Committee (which may include email).

If Seven Generations is invited to participate, during a quiet period, in investment meetings, presentations or conferences organized by others, and such invitation is accepted, the attendees from Seven Generations shall not make selective disclosure of any undisclosed material information.

Section 22 Responsibility for Electronic Communication

This Policy applies to electronic communications. Accordingly, Representatives responsible for written and oral public disclosures are also responsible for electronic communications.

Seven Generations will continuously update the investor relations section of Seven Generations' website and will monitor all information placed on the website for accuracy, completeness, currency and compliance with relevant securities laws.

The Disclosure Committee must approve all links from Seven Generations' website to a third party website. Any such links will include a notice that advises the reader that he or she is leaving Seven Generations' website and that Seven Generations is not responsible for the contents of the other site.

Investor relations material will be contained within a separate section of Seven Generations' website and will include a notice that advises the reader that the information posted was considered accurate at the time of posting, but may be superseded by subsequent disclosures or become inaccurate over time. All data posted to the website, including text and audiovisual material, will identify the date such material was issued. Any material changes in information will be updated as soon as possible and Seven Generations will establish an archiving system to store and provide access to information that is no longer current.

Disclosure on Seven Generations' website alone does not constitute adequate disclosure of information that is considered undisclosed material information. Any disclosures of material information on the website will be preceded by the issuance of a news release. Seven Generations will, however, endeavour to concurrently post to its website all documents filed on SEDAR in an effort to improve investor access to its information. Where practicable, Seven Generations will also endeavour to post on its website all supplemental information as given to analysts, institutional investors and other market professionals such as data book, fact sheets, slides of investor presentations and other relevant materials. Responses to electronic inquiries will be provided as appropriate. Only public information or information that could otherwise be disclosed in accordance with this Policy will be utilized in responding to electronic inquiries.

In order to avoid inadvertent disclosure of undisclosed material information, Representatives of Seven Generations are prohibited from participating in Internet chat rooms, bulletin boards or newsgroup discussions on matters pertaining to Seven Generations' activities or its securities. Representatives who encounter a discussion pertaining to Seven Generations should advise a member of the Disclosure Committee immediately, so the discussion may be monitored.

Each employee's corporate e-mail address is, in fact, an address of Seven Generations. Therefore, all correspondence received and sent by e-mail is to be considered correspondence of Seven Generations.

Section 23 In Distribution

If Seven Generations is in the process of a distribution of securities, such as when a private placement or prospectus offering has been announced or a prospectus has been filed, careful vigilance is required and "extra" disclosure should be avoided. It is advisable, where practicable, to avoid public presentations during the distribution period. Legal counsel shall be consulted prior to any discussions, written or otherwise, with any stakeholder.

Section 24 Communication and Enforcement

This Policy extends to all Representatives of Seven Generations, as well as advisors retained by Seven Generations and any other person authorized to act as a spokesperson of Seven Generations. New Representatives of Seven Generations will be provided with a copy of this Policy and will be advised of its importance. This Policy will be circulated to the foregoing individuals on an annual basis and whenever changes are made to its contents, or alternatively, be made available via Seven Generations' website.

Any employee who violates this Policy may face disciplinary action up to and including termination of his or her employment with Seven Generations without notice. Violation of this Policy may also violate certain securities laws. If it appears that a Representative or advisor of Seven Generations may have violated such securities laws, Seven Generations may refer the matter to the appropriate regulatory authorities, which could lead to penalties, fines or imprisonment.

The Disclosure Committee shall monitor the effectiveness and integrity of this policy and report to the Board.

Section 25 Amendment and Termination

This Policy may be amended or terminated by the Board at any time and from time to time.

Originally approved by the Board of Directors on September 8, 2014. Most recently amended on May 3, 2017.

APPENDIX A

SEVEN GENERATIONS ENERGY LTD.

DISCLOSURE COMMITTEE MANDATE

1. To review, on an ongoing basis, Seven Generations' Policy to ensure that it addresses Seven Generations' principal business risks, changes in operations or structure, and facilitates compliance with applicable legislative and regulatory reporting requirements.
2. To design a set of "disclosure controls and procedures" to provide reasonable assurance that:
 - (a) the Policy is effectively implemented across all business units and corporate functions; and
 - (b) information of a material nature is accumulated and communicated to senior management to allow timely decisions on required disclosures and certification.
3. To review prior to issuance or submission to the Audit and Finance Committee (or other appropriate committee of the Board) or the Board, as applicable:
 - (a) annual and interim filings, management information circulars, material change reports, annual information forms, and any other information filed with securities regulators;
 - (b) news releases containing financial information, earnings guidance, information about material acquisitions or dispositions, or other information material to investors;
 - (c) presentations and reports containing financial information broadly disseminated to analysts, creditors and investors, including financial information displayed on Seven Generations' website; and
 - (d) oral disclosures requiring review pursuant to the Policy.
4. To direct and supervise an annual evaluation of the effectiveness of Seven Generations' disclosure controls and procedures, and report to the Board as to any material findings from that evaluation.
5. To monitor compliance with Seven Generations' Policy.
6. To educate Seven Generations' directors, officers and employees on disclosure issues and the Policy and report to the Board not less than quarterly as to any material disagreements or matters or controversy among the members of the Disclosure Committee as to any disclosure matter.
7. To monitor the disclosure made on Seven Generations' website.

8. To bring to the attention of senior management all relevant information with respect to the Committee's activities, the annual or interim filings, and the evaluation of the effectiveness of Seven Generations' disclosure controls and procedures.