



## **Whistleblowing Policy**

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|------------------------|---------------|
| <b>Version Date:</b>   | 30 April 2021 |
| <b>Responsibility:</b> | Legal         |
| <b>Approved by:</b>    | The Board     |

Impact encourages openness and transparency in its commitment to the highest standard of integrity and accountability. Part of the way of achieving that is to provide a mechanism to allow employees to raise concerns (or whistle blow) about malpractice and impropriety directly to senior management.

Whistleblowing, or the disclosure of information relating to a suspected wrong-doing may include activities such as: bribery and corruption, malpractice in relation to health, safety or the environment, financial malpractice, fraud, criminal activity or failure to comply with legal obligations, improper conduct or unethical behaviour (including harassment), or other unethical or unacceptable conduct and attempts to conceal any of these.

This policy aims to encourage staff to report suspected wrongdoings in the knowledge that their concerns will be taken seriously and investigated and treated confidentially. If you make a report or disclosure about any actual or perceived malpractice or impropriety in good faith and without malicious intent, in the belief that an inappropriate action may have occurred or may be about to occur, you will be accorded protection of confidentiality and you will also be protected against detrimental action for having made such disclosure, to the extent reasonably practicable. This applies even if, after investigation, it is shown that you were mistaken.

The company encourages individuals to put their name to any disclosures they make as otherwise it can be far more difficult to assess the credibility of a claim.

In order to file a report, whether anonymous or not, please write to the following address or email [whistleblowing@impactoilandgas.com](mailto:whistleblowing@impactoilandgas.com):

For the private attention of:

The Chairman  
Impact Oil and Gas Limited  
Griffin House  
West Street  
Woking  
Surrey GU21 6BS  
United Kingdom

In cases of extreme sensitivity please write to Pascal Nicodeme, the Chairman of the Audit and Compliance Committee, for his private attention, on [pnicodeme@impactoilandgas.com](mailto:pnicodeme@impactoilandgas.com).