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Table of Contents

Health and Safety Policy	1
Environmental and Sustainability Policy	2
Human Rights Policy	3
Vendor Code of Conduct.....	4

Panhandle Oil and Gas Inc.

Health and Safety Policy

(adopted August 2020)

Our Policy

Panhandle Oil and Gas Inc. is committed to protecting the health and safety of everyone who plays a part in our operations, lives in the communities in which we operate, or uses our products. We recognize that strong health and safety practices have positive benefits both for us and our stakeholders. All employees and contractors, including vendors and suppliers, are expected to adhere to our operational principles, and, by doing so, we believe we can achieve our business goals safely, reliably, and without incident. We will not be satisfied until we succeed in eliminating all injuries, occupational hazards and diseases, and unsafe practices from our business activities.

Our Principles

Compliance with all applicable rules and regulations is the minimal expectation for conducting work. Going beyond minimum expectations, we seek to observe at all times, with respect to all of our facilities and operations, the following principles:

- Communicating clearly, through our ethics, attitude, and actions, our high regard for health and safety performance and our respect for the communities in which we operate;
- Driving improvement through active and visible leadership engagement by soliciting input, monitoring performance, and learning from our mistakes;
- Providing employees and contractors with the resources necessary to perform work safely;
- Encouraging communication among workers openly and honestly regarding health, safety, and security concerns and promoting involvement by stakeholders in the continuous development of this policy;
- Adhering to safe work practices and procedures and complying with safe work permits for all permit-required work activities; and
- Operating always within equipment design and operational limits and in a safe and controlled manner, including ensuring safety devices are in place and compliant with all applicable laws, regulations, and industry standards.

Our Expectation

Through implementation of this policy, we seek to earn the public's trust and to be recognized as a leader in health and safety practices. While all of our directors, officers, and employees have an obligation to observe and enforce this policy, and while we also expect the same of our vendors, suppliers, and other partners, compliance with this policy is the responsibility of management and overseen by the Board of Directors.

Panhandle Oil and Gas Inc.
Environmental and Sustainability Policy
(adopted August 2020)

Our Policy

Panhandle Oil and Gas Inc. is committed to conducting its business in a socially responsible and ethical manner that promotes the preservation of the natural environment.

Our Principles

Recognizing that our operations impact the environment, we strive to conduct our business activities in accordance with, and insist on supplier and vendor observance of, the following values:

- Complying with all applicable laws, regulations, and standards relevant to the management of risks to the environment arising from our business activities;
- Integrating an environmentally sensitive, conservation-focused culture into all relevant aspects of our business;
- Promoting awareness and emphasizing to and among our employees, vendors, suppliers, and other stakeholders the importance of limiting our carbon footprint and the environmental impact of all facets of our operations;
- Developing and implementing appropriate measures to reduce water and energy consumption and greenhouse gas emissions, where practicable, to increase the efficiency with which resources are used, and to limit environmental impact, waste, and cost associated with water and energy use;
- Identifying climate risks, continuously evaluating our performance, and pursuing opportunities to mitigate such risks through purposeful and strategic business and financial planning; and
- Developing and implementing appropriate and relevant response systems to limit detrimental impact to the environment should an accident or incident occur.

Our Expectation

We expect that this policy will be implemented by management through the development and implementation of procedures that assign specific responsibilities for the execution of relevant management and control activities to safeguard and preserve the natural environment. While all of our directors, officers, and employees have an obligation to observe and enforce this policy, and while we also expect the same of our vendors, suppliers, and other partners, compliance with this policy is the responsibility of management and overseen by the Board of Directors.

PANHANDLE OIL AND GAS INC.
Human Rights Policy
(adopted August 2020)

Our Policy

Panhandle Oil and Gas Inc. places utmost importance on the respect and equitable treatment of all people, including our employees, contractors, and other stakeholders involved in or impacted, directly or indirectly, by our operations. We believe the fair and ethical treatment of all individuals is not only an important consideration in conducting our business, but moreover a condition to our success.

Our Principles

In furtherance of our responsibility to engrain the respect for human rights into the foundation of our business, we are committed to endorsing the following standards, which are applicable to all aspects of our operations regardless of geographic location:

- Complying with all applicable laws, regulations, and standards relevant to the protection against and prevention of any and all actual or potential human rights violations that may arise in connection with our business activities;
- Recognizing and adhering to the principles set forth in ILO Standards Nos. 87 and 98, the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, and the Voluntary Principles on Security and Human Rights;
- Respecting fundamental human rights, including the right to water, and monitoring and enforcing a zero-tolerance policy that prohibits free or forced labor, child labor, and human trafficking and slavery;
- Safeguarding the rights of all individuals and groups, including, without limitation, minority groups' rights, women's rights, and indigenous rights;
- Prohibiting discrimination of any kind on the basis of sex, gender identity or expression, race, color, religion, national origin, citizenship status, age, disability, marital or veteran status, genetic information, sexual orientation, or any other legally-protected status under applicable law;
- Respecting and protecting freedom of association and maintaining labor practices that include fair wages and reasonable working hours;
- Fostering a tolerant, transparent, inclusive, and respectful work culture across all aspects of our business;
- Encouraging candid communication among all people involved in our operations regarding human rights concerns and promoting involvement by stakeholders in the continuous development of this policy; and
- Identifying human rights infringement risks, continuously evaluating our performance, and implementing mechanisms to mitigate such risks.

Our Expectation

We expect that this policy will be implemented by management through the development and implementation of procedures that assign specific responsibilities for the execution of relevant management and control activities to safeguard and preserve the integrity of the human rights of all people. While all of our directors, officers, and employees have an obligation to observe this policy, and while we also expect the same of our vendors, suppliers, and other partners, compliance with this policy is the responsibility of management and overseen by the Board of Directors.

PANHANDLE OIL AND GAS INC.

Vendor Code of Conduct

(adopted August 2020)

Introduction

Panhandle Oil and Gas Inc. expects its vendors, suppliers, and other partners to uphold high standards of conduct and to operate in accordance with all applicable laws and regulations, as well as in accordance with the standards set forth in this Vendor Code of Conduct. We maintain a strong expectation that our vendors, suppliers, and other partners will adopt and observe the principles set forth in this policy with respect to any and all involvement in our business operations, regardless of geographic location.

Our Principles

We endeavor to partner with vendors and suppliers that we believe operate in a manner that is:

- Consistent with all laws, rules, and regulations applicable to their business, products, and services, including possessing all appropriate licenses, registrations, and certifications required to conduct business in the locations in which they operate;
- Compliant with the terms and conditions of any executed contracts and all accepted purchase orders;
- Open, transparent, and with the highest integrity, including free from conflicts of interest;
- Consistent with antitrust and competition laws in the jurisdictions in which they operate;
- Inclusive and free of discrimination of any kind on the basis of sex, gender identity or expression, race, color, religion, national origin, citizenship status, age, disability, marital or veteran status, genetic information, sexual orientation, or any other legally-protected status under applicable law;
- Committed to freedom of association, fair wages, and reasonable working hours;
- Consistent with industry health and safety standards and our company-wide Health and Safety Policy;
- Compliant with all environmental laws and regulations and our company-wide Environmental and Sustainability Policy, including being conscientious and respectful of the impact of their products and services on the environment;
- Respectful and protective of minority groups' rights, women's rights, and indigenous rights;
- Respectful and protective of fundamental human rights, including the right to water and the adoption of labor practices that prohibit free or forced labor, child labor, and human trafficking and slavery, and compliant with our company-wide Human Rights Policy; and
- Compliant with anti-corruption laws and regulations and free of any form of extortion, corruption, or embezzlement.

Our Expectation

Our directors, officers and employees will endeavor to engage with vendors and suppliers that we believe comply with and enforce the principles set forth in this Vendor Code of Conduct. We may request additional assurances from our vendors and suppliers that they are in compliance with this Vendor Code of Conduct.