

WHISTLEBLOWER POLICY

This Whistleblower Policy (the “Policy”) is administered by Rockpoint and applies to all contractors, full-time employees and part-time employees (collectively, “employees”) of Rockpoint.¹

Purpose

This Policy has been established to create opportunity for Rockpoint employees to report serious misconduct within Rockpoint without fear of reprisal or victimization for whistleblowing in good faith.

Rockpoint is committed to the highest possible standards of ethical, moral and legal obligations, as described herein and elsewhere in other Rockpoint policies. It is important that any actions which are observed that are in contravention of these standards be reported and dealt with.

This Policy allows employees to report such concerns anonymously, should anonymity be required in the employee’s view.

Whistleblowing Defined

The term ‘whistleblowing’ generally refers to a person exposing secretive information or activity that is deemed illegal, unethical, or not correct within a private or public organization. The information of alleged wrongdoing can be classified in many ways: violation of company policy, law, regulation, or threat to public interest/national security, as well as fraud, and corruption.

In the context of this Policy, a whistleblower is one who brings information or allegations to surface either internally or externally. Internally, a whistleblower can bring information or allegations to the attention of management within Rockpoint, such as an immediate supervisor, the Human Resources Department or the Legal Department. Externally, a whistleblower can bring information or allegations to surface by contacting the Whistleblower Hotline.

¹ “Rockpoint” means Rockpoint Gas Storage Partners LP, Lodi Gas Storage LLC, Warwick Gas Storage Ltd., Sim Energy Ltd. and their respective subsidiary entities, and for greater certainty includes Access Gas Services Inc. and Access Gas Services (Ontario) Inc.

Whistleblower Hotline

Rockpoint has retained Lighthouse Services as its independent third-party service provider to administer external complaints under this Policy. Lighthouse Services has a Whistleblower Hotline where Rockpoint employees can bring their allegations of wrongdoing to bear.

Matters Covered Under the Policy

The Policy is intended to cover serious concerns that could have a large impact on Rockpoint. Examples of such concerns are: accounting irregularities, fraud, theft, violence or harassment, discrimination, falsification of company records, conflicts of interest, safety or security, and serious breaches of company policies. The foregoing are only examples of possible concerns which could be reported under this Policy, however, any matter which could have a material impact on Rockpoint may be reported.

Issues should always be reported internally first and only escalated to the Whistleblower Hotline should the internal resources fail to adequately resolve the employee's concern. For clarity, issues and concerns should be directed to: (1) first, to the concerned employee's supervisor; (2) second, to the Human Resources Department or the Legal Department; and (3) finally, as a tool of last resort, then to the Whistleblower Hotline.

Procedure for Reporting to the Whistleblower Hotline

Employees wishing to make allegations of wrongdoing externally under this Policy can do so by phoning 1-866-860-0008 and speak to a Lighthouse Services operator.

Note that the earlier a concern is expressed, the easier it will be for Rockpoint to take action and remedy the issue.

Although employees reporting a concern are not expected to prove the truth of an allegation, the employee will need to be able to demonstrate in his or her report that there are sufficient grounds for concern.

Safeguards

Harassment or Victimization

Employees who submit reports to the Whistleblower Hotline will be protected from reprisal and harassment or victimization of such individuals will not be tolerated.

Confidentiality

Every effort will be made to protect the reporter's identity by Lighthouse Services. However, in certain cases, the information provided in a Whistleblower Hotline report may be the basis of an internal and/or even external investigation. It is possible that as a result of the information provided in a report, the reporter's identity may become known to Rockpoint during the course of the investigation.

Anonymous Allegations

The Whistleblower Hotline allows employees to remain anonymous at their option. Concerns expressed anonymously will be investigated, but consideration will be given to: the seriousness of the issue raised; the credibility of the concern; and the likelihood of confirming the allegation from attributable sources.

False Allegations

Allegations which are intentionally false undermine the Policy and may result in disciplinary action, up to and including termination.

How Reports are Assessed

The action taken will depend on the nature of the concern. Rockpoint has internal processes with designated controls to ensure that allegations are investigated by non-interested management personnel.

Feedback to Reporter

The individual submitting a report will receive a response from Rockpoint. The response will:

- acknowledge that the concern was received;
- indicate how the matter will be dealt with;
- indicate whether further inquiries will need to be made of the individual; and
- provide an estimate of the time that it will take for a final response.

Further Information

The amount of contact between the individual submitting a report and the body investigating the concern will depend on the nature of the issue, the clarity of information provided, and whether the employee remains accessible for follow-up. Further information may be sought from Lighthouse Services. In certain cases it is possible that

further information can be sought from the employee through Lighthouse Services as an intermediary to maintain the anonymity of individual.

Outcome of an Investigation

It is important for the individual submitting a report to know that he or she may not know the outcome of an investigation. Rockpoint will use best efforts to inform the individual of the outcome of the investigation, but due to legal and other privacy constraints may be prevented from doing so.