

Greystone Oil & Gas Company Policy Manual

1. Introduction & Purpose

This Company Policy Manual establishes the standards, principles, and procedures that govern the conduct of Greystone Oil & Gas and everyone acting on its behalf. Its primary purpose is to promote ethical behavior, ensure compliance with applicable laws and industry regulations, safeguard company assets and reputation, and protect the interests of our employees, contractors, investors, communities, and other stakeholders. The Manual translates our values into practical expectations for day-to-day decision-making across all business functions and geographies.

Scope & Applicability. These policies apply to all Greystone Oil & Gas employees (full-time, part-time, and temporary), officers, directors, consultants, agents, third-party vendors, and joint-venture partners while conducting business for or on behalf of the Company. Where local law or contract imposes stricter requirements, the stricter standard prevails. Non-compliance may result in disciplinary action, up to and including termination of employment or business relationship, and may trigger legal consequences.

Guiding Principles. Greystone's conduct is anchored in integrity, safety, accountability, and stewardship. We commit to: (i) comply with all applicable laws, including anti-corruption, trade controls, antitrust, AML/KYC, data protection, labor, and environmental laws; (ii) operate safely and responsibly, prioritizing the health and well-being of people and the environment; (iii) maintain accurate books and records and transparent financial reporting; (iv) avoid conflicts of interest and improper gifts or entertainment; (v) safeguard confidential information and intellectual property; and (vi) treat all individuals with dignity and respect, fostering diversity, equity, and inclusion.

Purpose of this Manual. This document provides clear expectations and practical guidance on topics such as Code of Conduct, Health, Safety & Environment (HSE), Security, Human Resources, Equal Employment Opportunity, Harassment-Free Workplace, Information Security & Data Privacy, Anti-Bribery/Anti-Corruption, Sanctions & Trade Compliance, Procurement & Vendor Management, Investor Communications, Financial Controls, Community Relations, Sustainability, and Incident Reporting. Each section outlines responsibilities, key definitions, reporting channels, and consequences for violations.

Roles & Responsibilities. Every individual is responsible for reading, understanding, and complying with this Manual and any related procedures or standards. Managers are additionally responsible for modeling ethical leadership, reinforcing training, addressing questions, and escalating concerns. The Compliance and Legal functions administer the Manual, monitor adherence, investigate reports, and recommend corrective actions.

Speaking Up & Non-Retaliation. Greystone encourages prompt reporting of suspected violations, hazards, or unethical conduct. Reports may be made to a manager, HR, Compliance, Legal, or through designated reporting channels. Retaliation against anyone who raises a concern in good faith is strictly prohibited and will not be tolerated.

Policy Hierarchy & Exceptions. If a conflict arises between this Manual and local procedures, the higher applicable standard applies. Any exception requires prior written approval from the Compliance function (and Legal where appropriate) and must be documented.

Continuous Improvement. Greystone reviews this Manual periodically to reflect evolving laws, industry best practices, and organizational changes. Updated versions supersede prior versions upon issuance. Notice of material changes will be communicated to affected stakeholders, and additional training may be required.

By adhering to this Manual, we affirm our collective commitment to ethical, compliant, safe, and high-performance operations that create sustainable value for all stakeholders



2. Code of Ethics & Business Conduct

At Greystone Oil & Gas, our reputation and long-term success are built on a foundation of integrity, fairness, and accountability. This Code of Ethics & Business Conduct defines the standards of behavior expected from every employee, officer, director, contractor, and business partner acting on behalf of the Company. By adhering to these principles, we ensure our operations remain ethical, transparent, and aligned with stakeholder expectations.

Commitment to Integrity. All business decisions and interactions must be guided by honesty, responsibility, and good faith. Employees are required to avoid conduct that could undermine trust or damage the Company's reputation. This includes truthful communications, fair treatment of others, and consistent application of Company values in daily activities.

Prohibited Practices. Greystone enforces a strict zero-tolerance policy against bribery, fraud, embezzlement, insider trading, money laundering, misrepresentation, falsification of records, and any other form of corruption or dishonest behavior. Conflicts of interest—whether personal, financial, or professional—must be disclosed promptly to management and managed appropriately to protect the Company's interests.

Business Relationships. All dealings with customers, suppliers, regulators, investors, and community stakeholders must reflect professionalism, respect, and fairness. Gifts, entertainment, or hospitality that could influence, or appear to influence, business decisions are strictly limited and subject to Company approval processes.

Sustainability & Responsibility. Business conduct must prioritize not only immediate financial results but also long-term sustainability, safety, and social responsibility. Decisions should support responsible resource development, environmental stewardship, workplace safety, and the well-being of communities where we operate.

Employee Obligations. Every employee is responsible for understanding this Code, seeking guidance when uncertain, and reporting suspected violations through established reporting channels. Supervisors and managers have an additional duty to model ethical leadership, prevent misconduct, and respond promptly to concerns raised by their teams.

Enforcement & Consequences. Violations of the Code may result in disciplinary action, including termination of employment or contract, restitution of damages, and, where applicable, referral to legal authorities. The Company does not tolerate retaliation against individuals who report concerns in good faith.

By committing to this Code of Ethics & Business Conduct, we affirm that our growth will never come at the expense of integrity, safety, or the trust placed in us by employees, investors, communities, and regulators. This commitment is central to who we are as an organization and to the legacy we intend to build.



3. Corporate Governance

Purpose & Philosophy. Greystone Oil & Gas operates under strong governance principles designed to safeguard accountability, transparency, and fairness. Our governance system clarifies who makes decisions, how those decisions are made, and how performance and integrity are monitored. We align our practices with applicable laws, listing rules (if and when applicable), industry guidance, and international standards of corporate governance.

Governance Framework. The Company's framework consists of: (i) the Board of Directors and its committees; (ii) executive management led by the CEO; (iii) independent control functions (Compliance, Risk, Internal Audit, HSE, and Finance); (iv) policies, procedures, and internal controls; and (v) disclosure and stakeholder-engagement protocols. All elements work together to ensure prudent risk-taking, ethical conduct, and sustainable long-term value creation.

Role of the Board. The Board sets the Company's strategic direction, approves annual plans and budgets, appoints and oversees executive leadership, monitors risk and capital allocation, and ensures a robust system of internal controls. The Board reviews performance against strategy, approves major investments and transactions, and oversees succession planning for key roles.

Board Composition & Independence. The Board comprises individuals with diverse skills, industry experience, and backgrounds. A meaningful proportion of directors should be independent, free of relationships that could impair judgment. Directors must disclose potential conflicts of interest and recuse themselves where appropriate. New directors receive onboarding on Company operations, risks, and governance policies; all directors participate in periodic training.

Board Committees. To enhance oversight, the Board delegates specialized responsibilities to standing committees with written charters, regular meeting cadences, and clear reporting lines:

- **Audit & Finance Committee** – Oversees financial reporting, external audit, internal controls over financial reporting, tax, treasury, and whistleblower hotlines for accounting concerns. Reviews related-party transactions and recommends auditor appointment.
- **Risk & Compliance Committee** – Monitors enterprise risk management (ERM), legal and regulatory compliance (including anti-corruption, AML/KYC, trade/sanctions, data privacy), and crisis management readiness.
- **Health, Safety & Environment (HSE) Committee** – Oversees safety culture, environmental stewardship, spill prevention, incident investigations, and sustainability metrics.
- **Compensation & Human Capital Committee** – Oversees executive compensation, pay-for-performance alignment, equity plans, talent strategy, and culture metrics; ensures incentives do not encourage imprudent risk-taking.
- **Nominating & Governance Committee** – Leads Board succession, director recruitment, independence reviews, Board evaluations, and governance policy updates (including diversity, equity, and inclusion considerations).

Management's Role. Management executes strategy within risk appetite parameters set by the Board, maintains effective internal controls, and provides timely, accurate, and complete information to enable Board oversight. Authority is delegated through a Delegation of Authority (DoA) matrix specifying approval thresholds for capital expenditures, contracts, hiring, and other commitments.

Internal Controls & Assurance. The Company maintains a system of internal controls proportionate to its size and risk profile, including segregation of duties, approval workflows, cybersecurity controls, procurement standards, and inventory/asset safeguards. Internal Audit provides independent assurance over the design and operating effectiveness of controls and reports functionally to the Audit Committee.

Risk Management. Greystone employs an ERM framework to identify, assess, mitigate, and monitor strategic, operational, financial, legal/regulatory, cybersecurity, HSE, geopolitical, and reputational risks. Material risks and mitigation plans are reviewed at least quarterly by the Risk & Compliance Committee and summarized for the full Board.

Ethics, Conflicts, and Related-Party Transactions. Directors, executives, and employees must act in the best interest of the Company and avoid conflicts of interest. Any actual or potential conflict must be disclosed immediately. Related-party transactions require prior review and approval by the Audit & Finance Committee (or the full Board when appropriate) and are documented in accordance with policy.

Transparency & Disclosure. Financial statements and material information are prepared and disclosed in accordance with applicable accounting standards and regulatory requirements. The Company commits to accurate, timely, and balanced communications with investors, employees, partners, and regulators. Selective disclosure is prohibited.



4. Investor Relations Policy

Purpose & Commitment. Greystone Oil & Gas is committed to transparent, timely, accurate, and equal communication with current and prospective investors, lenders, and analysts. Our investor relations (IR) practices are designed to enhance market understanding of our strategy, operations, risks, and performance; support fair valuation; and build long-term trust with stakeholders.

Scope & Applicability. This Policy applies to all Company personnel who may create, review, approve, or disseminate information that could be used by the investment community, including executives, Board members, Finance, Legal/Compliance, Operations, HSE, and Communications teams, as well as authorized external advisors.

Communication Principles.

- **Accuracy & Completeness:** Information must be factual, consistent, and supported by internal records and controls.
- **Timeliness:** We disclose material information promptly once decisions are made or facts are known and verified.
- **Fair & Non-Selective Disclosure:** All material updates are shared broadly and simultaneously to the market; selective disclosure is prohibited.
- **Clarity & Accessibility:** Terminology should be clear, avoiding jargon where possible; disclosures are posted to the investor section of our website and provided via approved channels.
- **Confidentiality:** Non-public information is safeguarded until released in accordance with this Policy.

Financial Reporting Standards. The Company prepares financial statements in accordance with applicable accounting standards (e.g., U.S. GAAP or IFRS, as designated by the Company) and relevant regulatory requirements. Reporting includes audited annual statements, reviewed interim results (where applicable), and other periodic filings or releases required by law or good practice.

Material Information & Disclosure Controls.

- **Materiality Assessment:** A Disclosure Committee (Finance, Legal/Compliance, IR, and relevant executives) determines materiality and the appropriate form and timing of disclosure.
- **Approved Channels:** Press releases, regulatory filings, earnings materials, the corporate website (IR portal), webcasts, investor presentations, and publicly announced conference calls.
- **Quiet Periods:** The Company may observe quiet periods ahead of earnings or major announcements, during which we limit commentary on financial performance or outlook.
- **Crisis & Incident Reporting:** Material operational incidents (e.g., HSE events, production interruptions), cyber events, or significant legal developments are disclosed promptly following verification and consistent with regulatory guidance and this Policy.

Authorized Spokespersons. Only the CEO, CFO, designated Investor Relations Officer, and other individuals explicitly authorized in writing may speak with investors, analysts, media, or rating agencies about Company matters. Employees must direct all inquiries to IR. Comments made by non-authorized individuals are not considered official Company statements.

Earnings Communication & Guidance.

- **Earnings Releases & Calls:** The Company may host scheduled earnings calls/webcasts with accompanying presentations and Q&A. Materials are made available to all investors simultaneously.
- **Forward-Looking Statements:** Where outlook or targets are provided, we will identify such statements as forward-looking and include appropriate cautionary language and risk factors.
- **Guidance Updates:** Any changes to previously issued guidance are communicated promptly and through approved channels.

Meetings, Conferences & Site Visits. The Company engages with investors via non-deal roadshows, conferences, one-on-one meetings, and site visits. Discussions are limited to publicly available information or immaterial data. If material non-public information is inadvertently shared, the Company will promptly make public disclosure.

Handling Investor & Analyst Inquiries.

- All inquiries are logged by IR, reviewed for consistency with public disclosures, and answered in a timely manner.
- The Company does not provide selective new information to any party.
- Analysts' models and reports are not reviewed for accuracy; however, IR may correct factual, publicly verifiable errors.

Insider Trading & Blackout Windows. Directors, officers, and employees with access to material non-public information are prohibited from trading Company securities until such information is publicly disclosed and any blackout period has expired. The Insider Trading Policy governs pre-clearance, 10b5-1 plans (if applicable), and prohibited transactions (e.g., short sales, hedging).



5. Compliance & Legal Obligations

Commitment. Greystone Oil & Gas is fully committed to conducting business in strict compliance with all applicable legal, regulatory, and contractual requirements. Compliance is not optional—it is a fundamental expectation of every employee, officer, director, contractor, and partner engaged in Company operations.

Scope. This Policy applies to all aspects of our business, including anti-bribery and anti-corruption, sanctions and trade restrictions, anti-money laundering (AML) and Know Your Customer (KYC) requirements, competition/antitrust laws, securities regulations, health, safety and environmental (HSE) rules, labor standards, and data protection obligations. Where local law or contract imposes stricter standards, the higher requirement prevails.

Employee Responsibilities. Every individual must:

- Understand and follow applicable laws and Company policies.
- Avoid and report conflicts of interest, bribery, fraud, or misconduct.
- Safeguard confidential information and Company assets.
- Maintain accurate books and records to support transparency and accountability.
- Participate in required compliance and legal training programs.

Investigations & Reviews. Employees are expected to cooperate fully with compliance reviews, audits, and legal investigations. Information provided must be truthful, complete, and timely. All relevant records must be preserved when a legal hold is in effect.

Reporting Concerns. Suspected violations of law, policy breaches, or unethical behavior must be reported promptly through designated channels, including management, Compliance, Legal, or the confidential reporting hotline. Retaliation against good-faith reporting is strictly prohibited.

Enforcement. Failure to comply with legal or regulatory obligations, or refusal to cooperate with investigations, may result in disciplinary measures—up to and including termination of employment or business relationships. In serious cases, matters may be referred to law enforcement or regulatory agencies.

Continuous Improvement. Compliance policies are reviewed regularly to reflect changes in laws, regulations, and industry practices. Employees will be notified of updates and may be required to complete refresher training.

By adhering to these Compliance & Legal Obligations, Greystone Oil & Gas safeguards its reputation, maintains stakeholder trust, and ensures long-term sustainability through lawful and ethical operations.



6. Anti-Money Laundering (AML) & Know Your Customer (KYC)

Commitment & Purpose. Greystone Oil & Gas maintains robust AML/KYC controls to prevent money laundering, terrorist financing, sanctions evasion, fraud, and other financial crimes. Compliance is mandatory for all employees, contractors, and partners.

Scope. Applies to onboarding and ongoing management of customers, investors, suppliers, agents, intermediaries, and joint-venture partners in every jurisdiction where we operate. Where local law is stricter, the higher standard prevails.

Risk-Based Approach. We assess inherent and residual risks (customer, product/service, geography, delivery channel) and apply proportionate controls, enhanced measures for higher-risk relationships, and simplified measures only where permitted by law.

Customer Due Diligence (CDD).

- Collect and verify identity information for entities and natural persons before engagement.
- Identify and verify beneficial owners and controlling persons.
- Understand purpose and intended nature of the relationship; confirm source of funds/wealth where appropriate.
- Apply Enhanced Due Diligence (EDD) to high-risk parties (e.g., PEPs, high-risk jurisdictions, complex ownership).

Screening & Sanctions.

- Screen all counterparties (and their beneficial owners) against sanctions, watchlists, PEP lists, and adverse media at onboarding and periodically thereafter.
- No dealings with prohibited parties, embargoed countries, or banned end uses. Escalate potential matches to Compliance.

Ongoing Monitoring.

- Monitor transactions and behavior for consistency with known profile, flag anomalies, and review higher-risk relationships more frequently.
- Escalate unusual patterns (rapid movements, structuring, third-party payments, inconsistent trade flows).

Cash & Payments Controls.

- Limit or prohibit cash transactions; require traceable channels.
- Match payers/payees to approved counterparties; no undisclosed third-party payments.
- Validate bank details and ownership; apply hold/review on mismatches.

Recordkeeping. Maintain CDD/EDD files, screening results, transaction data, and investigation notes for the statutory retention period (or longer if under legal hold). Records must be complete, accurate, and retrievable.

Suspicious Activity Reporting.

- Immediately report suspected or known violations or suspicious transactions to Compliance using Company procedures.
- Compliance determines whether to file STR/SAR with competent authorities and manages any law-enforcement requests.
- Strict confidentiality: do not tip off customers about filings or investigations.

Third Parties & Agents. Conduct risk-based due diligence before engagement; require contractual AML clauses, audit/termination rights, and ongoing oversight. Elevated-risk agents require Compliance approval.

Training & Certification. Role-based AML/KYC training is required at onboarding and periodically; targeted refreshers are issued for high-risk functions. Non-completion may result in access suspension or discipline.

Data Privacy & Security. Handle personal and financial data lawfully, minimally, and securely, in line with applicable privacy laws and Company data-protection policies.

Governance & Accountability. The Chief Compliance Officer owns this Policy; the Board (via the Risk & Compliance Committee) oversees program effectiveness. Functions must cooperate fully with reviews, audits, and regulatory examinations.

Enforcement. Breaches of AML/KYC requirements—or failure to cooperate—may lead to disciplinary action up to termination, contract cancellation, recovery of losses, and potential regulatory or criminal referral.

By following this AML & KYC Policy, we protect the Company, our stakeholders, and the financial system, while preserving our license to operate and our reputation for integrity



7. Health, Safety, and Environment (HSE)

Commitment. Greystone Oil & Gas places the highest priority on the health and safety of employees, contractors, and host communities, and on the protection of the environment. No business objective justifies working unsafely or harming the environment.

Scope. This Policy applies to all operations, projects, offices, logistics, and contractors/joint-venture partners acting on our behalf. Where local law or client requirements are stricter, the higher standard prevails.

Principles.

- Zero Harm Mindset: Prevent injuries, illnesses, spills, and significant environmental impacts.
- Compliance: Meet or exceed applicable HSE laws, permits, and recognized international standards.
- Risk Management: Identify hazards, assess risks, implement controls, and verify effectiveness (hierarchy of controls).

Roles & Responsibilities.

- Management: Provide resources, set objectives/KPIs, review performance, and lead by example.
- Supervisors: Ensure procedures, permits, and training are in place before work starts; stop or refuse work if unsafe.
- All Personnel: Follow procedures, use PPE, report hazards and incidents immediately, and participate in training and drills.

Operational Controls.

- Life-Saving Rules: Energy isolation/LOTO, confined space, working at height, lifting operations, hot work, line-of-fire, driving/journey management, and substance-free workplace.
- Permits to Work: Required for high-risk tasks; pre-job risk assessments/JSA mandatory.
- Contractor Management: Pre-qualification, HSE expectations in contracts, site inductions, and performance monitoring.

Emergency Preparedness.

- Site-specific emergency response plans (ERP), muster points, spill kits, and first-aid capability.
- Regular drills with learnings captured and tracked to closure.
- Clear escalation and communication protocols with authorities and communities as required.

Environmental Stewardship.

- Spill prevention, secondary containment, and immediate response/recovery for releases.
- Emissions, waste, and water management plans with targets for reduction and proper disposal.
- Biodiversity and land-use controls; reclamation/restoration where applicable.

Training & Competency.

- Role-based HSE training at onboarding and periodically (e.g., PPE, PTW, confined space, driving, ergonomics).
- Competency verification for critical roles and equipment operators.

Reporting, Learning & Non-Retaliation.

- Prompt reporting of hazards, near misses, incidents, and non-compliance via designated channels.
- Incident investigation proportional to severity; root-cause analysis and corrective actions tracked.
- No retaliation for good-faith reporting or exercising stop-work authority.

Audits & Continuous Improvement.

- Routine inspections, audits, and management reviews; leading/lagging indicators monitored.
- Findings are documented; corrective and preventive actions implemented and verified.

Documentation & Records.

- Maintain permits, inspections, training, medical/fit-for-duty (where lawful), incident logs, and monitoring data per retention schedules.

Enforcement. Violations of HSE requirements may result in removal from site, disciplinary action or termination, and—where applicable—regulatory reporting.

By living this HSE Policy, we protect people, preserve the environment, and sustain our license to operate—every job, every day.



8. Workplace Conduct & Employee Responsibilities

Commitment. Greystone Oil & Gas is committed to a respectful, inclusive, and harassment-free workplace where everyone is treated with dignity. Professional conduct is a condition of employment and essential to our culture and performance.

Scope. This Policy applies to all employees, officers, directors, interns, contractors, vendors, and visitors at Company locations, remote settings, off-site events, customer sites, and in all work-related digital channels.

Standards of Conduct.

- **Professionalism & Respect:** Speak and act courteously; collaborate in good faith; resolve disagreements constructively.
- **No Discrimination:** Decisions regarding hiring, pay, promotion, and assignments are based on merit and business need—never on protected characteristics.
- **Zero Tolerance for Harassment & Bullying:** No unwelcome conduct, comments, visuals, or physical behavior creating an intimidating, hostile, or offensive environment—whether in person or online.
- **Sexual Harassment Prohibited:** Includes quid-pro-quo requests, unwanted advances, lewd comments, or sharing explicit content.
- **Inclusive Practices:** Use inclusive language, respect cultural differences, and provide reasonable accommodations where required by law.

Workplace Behavior Expectations.

- **Integrity & Compliance:** Follow Company policies, the Code of Ethics, applicable laws, and safety rules at all times.
- **Confidentiality & Data Protection:** Safeguard Company, customer, and employee information; follow access and classification rules.
- **Digital & Social Media Conduct:** Use Company systems responsibly; avoid offensive, defamatory, or discriminatory posts; do not represent the Company without authorization.
- **Substance-Free Workplace:** No working under the influence of alcohol, illegal drugs, or misused medications; testing may apply where lawful.
- **Attendance & Fitness for Duty:** Be punctual, reliable, and fit to perform assigned tasks safely and effectively.
- **Use of Assets:** Protect Company property, avoid misuse of email/internet, and report loss or theft immediately.
- **Conflicts of Interest:** Disclose outside activities or relationships that could impair objectivity; seek guidance before proceeding.

Reporting & Support.

- **Speak Up:** Promptly report discrimination, harassment, retaliation, safety concerns, policy violations, or suspected misconduct to a manager, HR, Compliance/Legal, or designated reporting channels.
- **Non-Retaliation:** Retaliation against anyone who reports a concern or participates in an investigation in good faith is strictly prohibited.
- **Resources:** HR provides guidance, support, and reasonable accommodations; EAP or local equivalents may be available where offered.

Investigations & Confidentiality.

- The Company investigates reports impartially and promptly, protecting privacy to the extent possible and disclosing information only on a need-to-know basis. Employees must cooperate fully and preserve relevant records.

Corrective Action.

- Violations of this Policy may result in corrective measures up to and including counseling, training, reassignment, written warning, suspension, termination of employment or contract, and, where appropriate, referral to authorities.

Manager Responsibilities.

- Model professional behavior; set clear expectations; act on concerns without delay; escalate issues to HR/Compliance; and ensure no retaliation occurs within their teams.

Training & Awareness. Mandatory onboarding and periodic refresher training on respectful workplace, anti-harassment, bystander intervention, and inclusion. Additional training may be required for supervisors.

By upholding these standards, each of us helps maintain a workplace that is safe, productive, and welcoming—enabling everyone at Greystone Oil & Gas to do their best work.



9. Anti-Corruption & Bribery Policy

Greystone Oil & Gas maintains a zero-tolerance stance toward bribery, facilitation payments, and corrupt practices across all operations and jurisdictions.

Purpose

This policy ensures that all Greystone employees, officers, contractors, and representatives act with integrity and comply with anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and equivalent international standards.

Key Principles:

- **No Bribes or Kickbacks:** Offering, giving, requesting, or accepting anything of value to gain an improper advantage is strictly prohibited.
- **No Facilitation Payments:** “ Speed” or “ grease” payments to expedite routine actions are not allowed.
- **Gifts & Hospitality:** Modest, lawful, and infrequent business courtesies may be acceptable only if they cannot influence a decision or create an appearance of impropriety.
- **Government Officials:** Extra caution must be exercised; any gift, payment, or hospitality involving public officials requires written pre-approval from Compliance.
- **Third Parties:** Agents, intermediaries, and contractors must adhere to the same ethical standards and may not be used to circumvent this policy.

Responsibilities

- Employees must act honestly, keep accurate financial records, and report suspected misconduct.
- Managers must promote ethical behavior and ensure all team members understand this policy.
- All employees must complete any required compliance training.

Reporting & Enforcement

Suspected violations should be reported immediately to a manager, HR, or Compliance at support@gsogcorp.com. Reports made in good faith are protected from retaliation.

Consequences

Violations of this policy may result in disciplinary action, termination, or legal prosecution under applicable laws.

Effective Date: _____ Approved by: _____

Review Cycle: Annually or as required by law



10. Financial Integrity & Reporting Standards

Greystone Oil & Gas upholds the highest standards of financial accuracy, transparency, and accountability. Every financial record, transaction, and report must truthfully reflect the company' s operations and comply with all applicable accounting and legal requirements.

Purpose

The purpose of this policy is to ensure that all Greystone personnel maintain the integrity of financial information. Proper recordkeeping safeguards the company' s reputation, supports informed decision-making, and fulfills the expectations of regulators, investors, and partners

Policy Statement

All employees, officers, and contractors are responsible for maintaining financial records that are:

- Accurate and Complete – Every entry must represent the true nature of the transaction, with proper supporting documentation.
- Transparent – All reports must clearly and fairly present the company' s financial position without concealment or distortion.
- Compliant – All accounting records must follow accepted standards such as GAAP or IFRS, as well as applicable tax and regulatory obligations.
- Auditable – Financial information must be readily available for internal or external audits and maintained in a manner that supports full traceability.

Prohibited Conduct

The following actions are strictly prohibited:

- Misrepresentation or manipulation of accounting records, invoices, or financial statements.
- Unauthorized alterations, omissions, or destruction of financial documents.
- Use of company funds or assets for personal gain or non-business purposes.
- Creation of unrecorded or “ off-the-books” accounts to conceal transactions.
- Knowingly approving or submitting false financial information.

Any individual found engaging in these activities will be subject to disciplinary action, up to and including termination of employment and potential legal prosecution.

Responsibilities

- Finance & Accounting Departments: Ensure accuracy of all entries, compliance with accounting standards, and proper approval of payments.
- Department Heads: Review financial submissions from their teams and verify accuracy before approval.
- All Employees: Exercise honesty in financial dealings, report discrepancies immediately, and cooperate fully during audits.

Reporting Misconduct

Employees are required to report any suspicion of financial fraud, falsification, or irregular activity to Compliance via support@gsogcorp.com.

Greystone strictly prohibits retaliation against anyone who raises a concern in good faith.

Commitment to Integrity

Maintaining financial integrity is essential to Greystone' s long-term success, investor confidence, and compliance with the law. Each employee plays a vital role in protecting the company' s reputation by upholding honesty and transparency in every transaction.



11. Confidentiality & Data Protection

Greystone Oil & Gas is committed to protecting all forms of confidential, proprietary, and personal information entrusted to the company. The security of our data and the privacy of our stakeholders are critical to maintaining trust, legal compliance, and operational integrity.

Purpose

This policy establishes the principles and responsibilities for safeguarding confidential and sensitive information. It ensures that all employees handle data lawfully, securely, and only for authorized business purposes.

Scope

This policy applies to all employees, officers, contractors, consultants, and third-party partners who have access to Greystone's systems, files, or proprietary data. It covers information in any form—digital, printed, verbal, or visual.

Policy Statement

Confidential and personal data must be:

- Accessed only when necessary for legitimate business purposes.
- Stored securely, with access restricted to authorized personnel.
- Transmitted safely, using approved communication or encryption methods.
- Used lawfully, in compliance with applicable data protection regulations such as the U.S. Privacy Act, GDPR, and relevant industry standards.
- Destroyed responsibly, once it is no longer needed for operational or legal purposes.

Examples of Confidential Information

- Trade secrets, exploration data, and financial results.
- Vendor, client, and investor information.
- Employee records and personally identifiable information (PII).
- Technical drawings, business strategies, and internal communications.

Responsibilities

- All Employees: Must protect confidential data from unauthorized disclosure, loss, or misuse, both during and after employment.
- Managers: Ensure that their teams understand and follow security procedures and access controls.
- IT & Compliance Teams: Maintain secure systems, perform risk assessments, and investigate potential data breaches promptly.

Prohibited Actions

- Sharing confidential or personal data with unauthorized individuals.
- Discussing sensitive company matters in public or unsecured environments.
- Downloading, copying, or transmitting data outside approved channels.
- Failing to report known or suspected data breaches immediately.

Reporting and Enforcement

Any breach or suspected breach of data protection or confidentiality must be reported immediately to Compliance at support@gsogcorp.com. Violations of this policy may result in disciplinary action, termination, or legal penalties under data protection laws.

Commitment

Greystone values confidentiality as a foundation of professional conduct. Protecting information is not only a legal obligation but a reflection of our integrity, accountability, and respect for all stakeholders.



12. Whistleblower Policy

Greystone Oil & Gas maintains a culture of integrity, transparency, and accountability. Every employee and partner has a duty to report unethical, illegal, or unsafe conduct without fear of retaliation. This policy provides a clear and confidential process for raising concerns and ensures that all reports are handled with fairness and professionalism.

Purpose

The purpose of this policy is to promote an open environment where employees can safely disclose any suspected misconduct, fraud, corruption, or policy violations that may affect the company's integrity or reputation. Greystone is committed to protecting those who act in good faith to uphold ethical standards.

Scope

This policy applies to all employees, officers, contractors, suppliers, and consultants who work with or represent Greystone Oil & Gas in any capacity.

What Should Be Reported

Employees are encouraged to report any instance of:

- Fraud, theft, or financial misrepresentation.
- Corruption, bribery, or conflicts of interest.
- Safety violations or environmental negligence.
- Discrimination, harassment, or abuse of authority.
- Retaliation against individuals who report misconduct.
- Any other action that breaches company policy or the law.

Reporting Process

Reports may be submitted in any of the following ways:

- Directly to Management or any department head.
- Confidentially to the Compliance Department via email at support@gsogcorp.com.
- Anonymously, if preferred, through written submission to the Compliance Office.

All reports will be treated with strict confidentiality, and the company will make every effort to protect the identity of the whistleblower unless disclosure is required by law.

Investigation & Follow-Up

- All reports will be promptly reviewed and investigated by the Compliance or Audit Committee.
- Investigations will be fair, unbiased, and based on evidence.
- Corrective or disciplinary actions will be taken where misconduct is confirmed.
- The whistleblower will be informed, where possible, of the outcome of the investigation.

Protection Against Retaliation

Greystone strictly prohibits any form of retaliation—such as demotion, harassment, or dismissal—against individuals who report concerns in good faith. Retaliatory actions are themselves a serious violation of this policy and will result in disciplinary measures.

Commitment

Greystone believes that safeguarding ethical conduct begins with employee courage and corporate responsibility. Every team member is empowered to speak up, knowing that their voice contributes to a transparent, honest, and accountable organization.



13. Social Responsibility & Community Engagement

Greystone Oil & Gas recognizes that responsible business practices extend beyond operational success to include meaningful contributions to society. The company is dedicated to creating lasting positive impact in the communities where it operates by fostering sustainable development, education, and opportunity.

Purpose

This policy outlines Greystone's commitment to social responsibility, ensuring that corporate growth aligns with community advancement, environmental stewardship, and ethical standards.

Commitment to Communities

Greystone is devoted to:

- Investing in Local Development – Supporting infrastructure, education, and healthcare initiatives that improve the quality of life in host communities.
- Promoting Local Employment – Prioritizing local hiring, workforce training, and skills development to create sustainable livelihoods.
- Encouraging Education & Youth Empowerment – Partnering with schools and vocational institutions to expand access to learning and professional training.
- Sustaining Environmental Balance – Operating with care for natural resources, minimizing waste, and supporting restoration projects that protect ecosystems.

Ethical Engagement

Greystone believes that community relationships must be built on respect, transparency, and partnership. All engagement activities must:

- Be inclusive and culturally sensitive.
- Reflect the company's integrity and ethical values.
- Ensure that community input is heard and incorporated into decision-making.

Employee Involvement

Employees are encouraged to participate in volunteer programs, outreach events, and sustainability projects that align with Greystone's values. The company supports initiatives that strengthen unity and promote social well-being across its operational regions.

Partnerships & Collaboration

Greystone collaborates with local governments, NGOs, and community leaders to identify areas where investment can deliver the greatest positive outcomes. Projects are selected based on sustainability, measurable impact, and alignment with the United Nations Sustainable Development Goals (SDGs).

Commitment

By integrating social responsibility into its core business strategy, Greystone Oil & Gas demonstrates that ethical energy development and community progress can coexist. The company's goal is to create shared value, leaving every community it touches stronger, more resilient, and better equipped for the future.



14. Risk Management & Internal Controls

Greystone Oil & Gas is committed to maintaining a proactive and disciplined approach to risk management across all areas of its operations. Through effective internal controls, the company ensures that risks are identified early, managed responsibly, and mitigated to protect shareholders, employees, and stakeholders.

Purpose

This policy establishes Greystone's framework for identifying, assessing, and managing financial, operational, legal, strategic, and reputational risks. It reinforces the company's commitment to sound governance, transparency, and sustainable growth.

Risk Management Principles

Greystone's approach to risk management is based on the following principles:

- **Prevention First:** Anticipate and address potential risks before they materialize.
- **Accountability:** Every employee shares responsibility for identifying and reporting risks within their area of work.
- **Continuous Monitoring:** Risks are tracked, analyzed, and reassessed regularly to ensure mitigation measures remain effective.
- **Transparency:** All significant risks are reported promptly to executive management and, where applicable, to the Board of Directors.

Internal Controls

To safeguard company assets and ensure integrity in reporting, Greystone maintains a structured system of internal controls that includes:

- **Regular Audits:** Independent and internal audits are conducted to verify compliance and detect irregularities.
- **Policy Compliance:** All employees must adhere to approved procedures governing financial transactions, procurement, and operations.
- **Segregation of Duties:** Clear role separation minimizes the risk of errors or unauthorized activities.
- **Data Integrity:** Systems are designed to ensure accuracy, confidentiality, and security of financial and operational records.

Risk Categories

The company actively manages and reviews risks related to:

- **Financial Exposure** – liquidity, capital allocation, and credit management.
- **Operational Efficiency** – production, logistics, and infrastructure performance.
- **Legal & Regulatory Compliance** – adherence to laws, contracts, and permits.
- **Health, Safety & Environment (HSE)** – workplace safety and environmental sustainability.
- **Reputation & Ethics** – public trust, stakeholder confidence, and brand integrity.

Governance & Oversight

Risk oversight is managed through a structured governance model involving the Executive Management Team, Risk Committee, and Internal Audit Department, ensuring that controls are tested and continuously improved. Findings are documented, reviewed, and integrated into ongoing strategic planning.

Commitment

Through disciplined risk management and robust internal controls, Greystone Oil & Gas ensures operational resilience, financial stability, and long-term value creation. This commitment reflects the company's belief that responsible governance is the cornerstone of sustainable success.



15. Conflict of Interest Policy

Greystone Oil & Gas upholds the highest standards of integrity and transparency in all business dealings. Employees, officers, and directors are expected to act in the best interests of the Company and to avoid situations where personal interests, relationships, or external commitments could conflict with their professional responsibilities.

Purpose

The purpose of this policy is to ensure that all decisions made on behalf of Greystone Oil & Gas are impartial, ethical, and free from undue influence. The company seeks to prevent circumstances where personal gain or external obligations might compromise judgment or objectivity.

Definition of a Conflict of Interest

A conflict of interest occurs when an individual's private interests interfere—or appear to interfere—with the interests of the company.

Examples include:

- Having a financial interest in a competitor, vendor, or contractor.
- Using company resources or confidential information for personal benefit.
- Engaging in outside employment that competes with company operations.
- Participating in decision-making where family or friends may directly benefit.
- Accepting gifts, favors, or hospitality that could influence business decisions.

Disclosure & Reporting

All employees and directors must promptly disclose any potential or actual conflict of interest to their immediate supervisor, department head, or the Compliance Office. Disclosures will be handled discreetly and reviewed objectively to determine appropriate action.

Where a conflict exists, the individual may be required to recuse themselves from related discussions, decisions, or transactions to maintain fairness and protect the integrity of corporate operations.

Responsibilities

- **Employees:** Must remain vigilant and proactive in identifying possible conflicts.
- **Managers:** Are responsible for addressing and documenting disclosures within their teams.
- **Compliance Department:** Oversees policy enforcement, provides guidance, and ensures consistent application across all business units.

Non-Compliance

Failure to disclose a conflict of interest or to comply with this policy may result in disciplinary action, including termination of employment. Serious breaches may also lead to legal consequences under corporate governance and fiduciary duty regulations.

Commitment

Greystone Oil & Gas believes that integrity in decision-making is the foundation of lasting trust. By promoting transparency, accountability, and fairness, the company ensures that every action taken reflects its core values and commitment to ethical business conduct.



16. Trading, Investment & Profit Distribution Policy

Greystone Oil & Gas conducts all trading and investment activities with integrity, transparency, and strict adherence to applicable laws, regulations, and internal governance standards. The company maintains full accountability in its financial operations to protect the interests of investors, employees, and stakeholders.

Purpose

This policy establishes Greystone's framework for ethical trading, lawful investment practices, and transparent profit distribution. It reinforces the company's commitment to maintaining public trust and compliance with both domestic and international financial regulations.

Trading & Investment Conduct

All employees, officers, and partners involved in financial or market-related transactions must adhere to the following principles:

- Regulatory Compliance: All trading and investment decisions must comply with relevant securities, commodities, and anti-fraud laws.
- Prohibition of Insider Trading: Employees and affiliates are strictly prohibited from using confidential or non-public information for personal or third-party gain.
- Market Integrity: Manipulative, deceptive, or speculative activities intended to distort market value or performance are forbidden.
- Authorized Activity Only: All trading or investment transactions must be pre-approved by authorized management in accordance with internal financial controls.

Investment Oversight

Greystone maintains a dedicated financial oversight process to ensure that:

- All investments are evaluated for risk, liquidity, and return potential.
- Due diligence is conducted before entering any investment or partnership.
- Performance metrics and compliance checks are documented and reviewed periodically.

Profit Distribution

When profit distribution applies, it is governed by the principles of fairness, transparency, and pre-disclosure:

- All distribution schedules, formulas, and eligibility criteria are clearly defined and communicated to investors in advance.
- No preferential treatment will be granted to any party outside the terms of the approved distribution policy.
- Records of all profit allocations are maintained and subject to audit review to ensure accuracy and fairness.

Accountability & Enforcement

Violations of this policy, including insider trading, false reporting, or misuse of company funds, will result in disciplinary action and potential legal prosecution under corporate and securities law. Management reserves the right to suspend or revoke investment privileges where misconduct is identified.

Commitment

Through disciplined financial governance and transparent investment practices, Greystone Oil & Gas upholds its reputation as a responsible energy company committed to ethical growth, investor confidence, and sustainable profitability.



17. Communications & Media Relations

Greystone Oil & Gas maintains a unified, transparent, and professional approach to all communications. Every public statement, media engagement, and digital interaction must accurately reflect the company's values, integrity, and reputation within the energy sector.

Purpose

This policy governs how Greystone communicates with external audiences—including media, partners, and the public—to ensure that all information shared is accurate, authorized, and aligned with corporate objectives. The policy safeguards the company from misinformation, reputational harm, and unauthorized disclosures.

Authorized Communication

Only designated spokespersons or authorized executives may speak or issue statements on behalf of Greystone Oil & Gas. Employees, contractors, and affiliates are not permitted to respond to inquiries from journalists, analysts, or the public without prior approval from:

- The Corporate Communications Department, or
- The Executive Management Team.

All press releases, interviews, and official publications must undergo review and approval to ensure factual accuracy, compliance with disclosure laws, and consistency with company messaging.

Media & Public Statements

- **Accuracy First:** All information released must be factual, verifiable, and free of exaggeration or speculation.
- **Confidentiality:** Sensitive operational, financial, or strategic details must never be shared publicly.
- **Crisis Communication:** In the event of an incident or emergency, only the appointed spokesperson may issue statements to media or government agencies.
- **Professional Conduct:** Interactions with journalists, partners, or online audiences must always reflect respect, courtesy, and corporate decorum.

Social Media Use

Employees' personal use of social media must remain responsible and professional. The following principles apply:

- Avoid posting confidential or internal information.
- Do not represent personal opinions as company positions.
- Maintain respectful dialogue that upholds Greystone's brand reputation.
- Immediately report any online content or inquiries that could impact the company's image or operations.

Accountability & Compliance

Breaches of this policy—such as unauthorized statements, sharing of confidential information, or misuse of social media—may result in disciplinary action, including suspension or termination.

Commitment

Through clear, coordinated, and ethical communication, Greystone Oil & Gas ensures that every public engagement strengthens its reputation as a trusted, responsible, and forward-looking energy company.



18. Disciplinary Actions & Enforcement

Greystone Oil & Gas is committed to maintaining the highest standards of professional conduct, integrity, and compliance across all operations. Adherence to company policies, procedures, and ethical expectations is a condition of employment and partnership within the organization.

Purpose

This policy defines the framework for addressing violations of company policy or misconduct. It ensures that all disciplinary measures are fair, consistent, and proportionate to the severity of the infraction, while protecting the rights and dignity of all parties involved.

Scope

This policy applies to all employees, contractors, directors, and representatives of Greystone Oil & Gas, regardless of position or seniority. It covers breaches of internal policies, safety procedures, legal obligations, or ethical standards.

Types of Violations

Disciplinary action may result from, but is not limited to:

- Breach of company policy or code of conduct.
- Misuse of company property or confidential information.
- Fraud, corruption, or unethical business practices.
- Discrimination, harassment, or workplace misconduct.
- Repeated failure to meet performance or compliance expectations.

Disciplinary Measures

Depending on the nature, frequency, and impact of the violation, corrective actions may include:

- Verbal or Written Warning: For minor or first-time infractions.
- Suspension: Temporary removal from duties pending review or as corrective action.
- Demotion or Loss of Privileges: Where misconduct affects job responsibilities or trust.
- Termination of Employment or Contract: For serious or repeated offenses.
- Legal Proceedings: Initiated where misconduct constitutes a criminal or regulatory violation.

Investigation & Fair Process

All violations will be investigated promptly and impartially by the Human Resources or Compliance Department. The process will allow the individual an opportunity to respond before a final decision is made. Documentation of findings and actions taken will be securely maintained for audit and compliance purposes.

Commitment to Fairness

Greystone Oil & Gas enforces this policy with integrity, confidentiality, and consistency. Disciplinary decisions are based solely on evidence and applicable standards, without prejudice or retaliation.

Conclusion

By upholding accountability through structured enforcement, Greystone Oil & Gas reinforces its culture of ethical conduct and operational excellence—ensuring that every employee contributes to the company's long-term trust, safety, and success.



19. Amendments & Updates to Policies

Greystone Oil & Gas recognizes that effective governance requires adaptability. This Policy Manual is a living document, designed to evolve with changing laws, regulatory standards, and operational realities. The company remains committed to ensuring that all policies remain relevant, compliant, and aligned with best industry practices.

Purpose

This policy establishes the framework by which company policies are reviewed, updated, and communicated to employees, partners, and investors. It ensures that Greystone maintains transparency and accountability as its business and regulatory environments develop.

Policy Review & Revision

Greystone Oil & Gas conducts regular reviews of all policies to ensure accuracy and consistency with:

- Applicable local, federal, and international laws.
- Evolving industry standards and environmental, safety, and financial regulations.
- Internal operational requirements and strategic objectives.

Revisions may be initiated by the Compliance Department, Executive Management, or the Board of Directors based on identified needs, risk assessments, or legal updates.

Approval & Implementation

All amendments and new policies must be reviewed and approved by the Executive Management Team or other designated authority prior to implementation.

Once approved, the revised policies are formally issued through internal communications and updated in official company documentation and digital systems.

Notification of Changes

Greystone ensures timely notification of all material policy changes to affected employees, investors, and stakeholders. Such communications may include:

- Company-wide memos or bulletins.
- Updates through the corporate portal or employee handbook.
- Investor announcements where relevant to compliance or governance.

Employee Responsibility

Employees are responsible for familiarizing themselves with all current policies and acknowledging receipt of major updates when required. Continued employment signifies understanding and compliance with the most recent version of the company's policies.

Commitment

Through structured review and transparent amendment processes, Greystone Oil & Gas maintains a governance framework that is both dynamic and dependable—ensuring that every update reflects the company's enduring values of integrity, accountability, and operational excellence.



20. Acknowledgment & Signature Page

Greystone Oil & Gas requires all employees, contractors, partners, and investors to acknowledge their understanding and acceptance of the policies outlined in this manual. This acknowledgment serves as a formal affirmation of each individual's commitment to uphold the company's ethical, operational, and compliance standards.

Purpose

The purpose of this section is to ensure that all parties governed by this manual have read, understood, and agreed to abide by its provisions. By acknowledging receipt, individuals confirm their awareness of company expectations and their role in maintaining a culture of integrity and accountability.

Scope of Acknowledgment

By continuing employment, contractual engagement, or investment with Greystone Oil & Gas, individuals acknowledge the following:

- That they have received and reviewed the Greystone Oil & Gas Corporate Governance & Ethics Manual (Version 14.7).
- That they understand the policies, responsibilities, and standards described within it.
- That they agree to comply with all policies, including future amendments or updates communicated by the company.
- That they understand violations of these policies may result in disciplinary action, termination, or legal proceedings as applicable.

Record of Acknowledgment

All signed acknowledgments—digital or physical—will be securely maintained by the Human Resources Department or Compliance Office as part of the company's permanent records. Failure to provide acknowledgment when requested may affect eligibility for continued engagement or investment participation.

Commitment

By confirming acknowledgment, every employee, director, and stakeholder reaffirms their dedication to Greystone Oil & Gas's values of honesty, transparency, and professionalism. This shared commitment ensures that every member contributes to the company's continued growth, reputation, and trustworthiness.

Acknowledgment Form

I, _____, hereby acknowledge that I have received, read, and understood the Greystone Oil & Gas Corporate Governance & Ethics Manual (Version 14.7). I agree to comply with its policies and uphold the standards of conduct described therein.

Signature: _____

Name: _____

Position/Title: _____

Date: _____

