
Title: Whistleblower Policy (HR062)

Revised: September 2025

I. GENERAL

4Refuel's Code of Conduct (Code) applies to employees, officers, and directors of 4Refuel and all of its subsidiaries and affiliates. 4Refuel's agents, consultants, contractors, and suppliers are also required to act consistently with the Code when acting with or on behalf of 4Refuel. As employees and representatives of 4Refuel, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

II. REPORTING RESPONSIBILITY

As employees and representatives of 4Refuel, we are responsible for complying with the Code and its supporting corporate policies. It is our right and responsibility to promptly report suspected Code contraventions to our local supervisor or manager or Human Resources, or through the other reporting options stated in this policy, and to cooperate with internal or external investigations of reported violations, as applicable.

III. NO RETALIATION

No director, officer, employee or other representative of 4Refuel or its subsidiaries or affiliates who in good faith reports a violation of the Code shall suffer harassment, retaliation, or adverse employment consequences. There will be no retaliation for speaking up and making a truthful report of actual or suspected misconduct, for cooperating in an investigation, or for exercising our legal rights. Anyone subject to this policy who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within 4Refuel rather than seeking resolution outside 4Refuel.

IV. REPORTING VIOLATIONS

- A. The Code addresses 4Refuel's open-door policy and suggests that employees share their questions, concerns, suggestions or complains with someone who can address them properly. In most case, an employee's supervisor or manager is in the best position address an area of concern. However, if you are not comfortable speaking with your supervisor or manager or if you are not satisfied with the response received, you are encouraged to speak with someone in your local Human Resources or anyone in management you are comfortable approaching. Management is required to report suspected violations of the Code to the Vice President, People & Culture who is responsible for investigating all reported violations.

- B. For suspected fraud or securities law violations, or if you are uncomfortable discussing any concerns or if these concerns remain unresolved, you can file a report through the ethics and compliance website, or call the ethics & compliance hotline, or contact the Vice President, People & Culture.

ETHICS AND COMPLIANCE REPORTING:

Web: <https://integritycounts.ca/org/4Refuel>

Phone: 1-866-921-6714

Email: 4Refuel@integritycounts.ca

V. Vice President, People & Culture

4Refuel's Vice President, People & Culture is responsible for investigating and resolving all reports alleging violations of the Code.

4Refuel's Vice President, People & Culture can be contacted as outlined below:

Mail: 103-14928 56 Ave., Surrey, BC, Canada V3S 2N5

Email: lharkness@4refuel.com

VI. ACTING IN GOOD FAITH

Anyone who reports a suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code. Those who misuse the reporting process and knowingly file reports that are false or malicious in nature are considered to have breached the Code and may be investigated.

If an investigation confirms that a violation has occurred, an appropriate course of action will be taken, which may include disciplinary measures up to and including termination of employment.

VII. CONFIDENTIALITY

We are assured of strict confidentiality in reporting suspected violations and cooperating with investigators, without fear of retaliation. Complainants may submit reports of suspected violations on a confidential basis or anonymously. Reports of suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

VIII. HANDLING OF REPORTED VIOLATIONS

Vice President, People & Culture will notify the sender and acknowledge receipt of the reported suspected violation within five (5) business days. All reports will be investigated promptly, and appropriate corrective action will be taken as the Vice President, People & Culture determines is warranted.

The online version of the 4Refuel Whistleblower Policy can be found on 4Refuel's website at www.4Refuel.com