TRANSGLOBE ENERGY CORPORATION

DISCLOSURE POLICY

OBJECTIVE AND SCOPE

The objective of this disclosure policy is to ensure that communications to the public about TransGlobe Energy Corporation and, where applicable, its subsidiaries (the "**Company**") are:

- informative, timely, factual, balanced and accurate; and
- broadly disseminated in accordance with all applicable legal and regulatory requirements.

This disclosure policy confirms in writing our existing disclosure policies and practices. Its goal is to raise awareness of the Company's approach to disclosure among the board of directors, senior management and employees.

This disclosure policy extends to all employees of the Company, its board of directors and those authorized to speak on its behalf. It covers disclosures in documents filed with the securities regulators and written statements made in the Company's annual and quarterly reports, news releases, letters to shareholders, presentations by senior management and information contained on the Company's website and any other public electronic communications (social media). It extends to oral statements made in meetings and telephone conversations with analysts and investors, interviews with the media as well as speeches and press conferences and conference calls and any other communication, the content of which would reasonably be expected to affect the market value or price of any security of the Company.

The Company has various disclosure obligations by virtue of being subject to certain securities laws the United Kingdom, in Canada and the United States, as well as certain rules and regulations (the "**TSX Rules**") of the Toronto Stock Exchange (the "**TSX**"), the Nasdaq Stock Market LLC (the "**Nasdaq**") and the London Stock Exchange plc (the "**LSE**"). This disclosure policy supplements and should be read together with the Company's AIM Rules Compliance Code (the "**AIM Code**"), and Policy on Share Dealing and Insider Trading (the "**Share Dealing Policy**"), in each case as adopted by the Company's board of directors from time to time. This disclosure policy does not deal with matters regulated by the AIM Code or the Share Dealing Policy, such as the requirements of the AIM Rules for Companies published by the LSE (the "**AIM Rules**") or the AIM Note for Mining, Oil and Gas Companies published by the LSE in June 2009 (the "**AIM Note"**) or those requirements of the EU Market Abuse Regulation (Regulation 596/2014) ("**MAR**") that relate to dealing in the Company's securities, unlawful disclosure of inside information or market manipulation. The AIM Code and the Share Dealing Policy should be referred to in relation to all such matters.

DISCLOSURE COMMITTEE

The board of directors determines disclosure policy, and establishes a disclosure and compliance committee (the "**Committee**") responsible for, among other things, overseeing the Company's disclosure practices. The Committee consists of not less than three officers of the Company, including the CEO, COO, CFO and any such other members who are appointed by the board of directors from time to time in consultation with the chairman of the Committee who are the individuals to whom potentially material information arrives by phone, fax, e-mail, mail and otherwise.

The Committee has been established with the responsibility of, among other things, overseeing the Company's disclosure practices. The Committee will meet or converse as required. The Committee will

report to the board of directors promptly where any matters ought reasonably to be brought to the attention of the board as outlined in this Disclosure Policy or, otherwise, at least twice annually.

It is essential that the members of the Committee be kept fully apprised of all pending material developments concerning the Company in order to evaluate and discuss those events and to determine the appropriateness and timing of public release of information. If any officer, director or employee of the Company becomes aware of any information which may constitute material information they must forthwith advise one of the members of the Committee. If any officer, director or employee is unsure whether or not information is material, they should immediately contact a member of the Committee before disclosing it to anyone. If it is deemed that material information should remain confidential, the Committee will determine how that information will be controlled.

The Committee will consider the Company's prior disclosure record to determine whether new information is likely to have a material and/or a significant impact on the price or value of the Company's common shares, whether a reasonable investor would likely consider the information important in making an investment decision or whether the information would otherwise constitute inside information for the purposes of MAR and will determine when developments require public disclosure. The Company's policy is, "when in doubt, disclose".

The Committee will ensure that the board of directors and the Company's nominated adviser are each in receipt of any news release being issued prior to the release crossing the wire.

The Committee will ensure that the board of directors is promptly and fully informed regarding potential disclosure issues facing the Company as they may arise from time to time. This includes circumstances in which aspects of potentially material information or an underlying matter may not then be known or fully known, investigation or analysis of potentially material information or an underlying matter is incomplete or the impact or magnitude of potentially material information or an underlying matter remains to be fully determined.

The Committee will review and recommend to the board of directors updates, if necessary, to this disclosure policy on an annual basis or as needed to ensure compliance with changing regulatory requirements. Updates and/or modifications to this disclosure policy will be subject to the approval of the board of directors.

PRINCIPLES OF DISCLOSURE OF MATERIAL OR INSIDE INFORMATION

Material information includes any information relating to the business and affairs of the Company that results in, or would reasonably be expected to result in a significant change in the market price or value of the Company's listed securities or that would reasonably be expected to have a significant influence on a reasonable investor's investment decisions. Material information consists of both material facts and material changes to the business and affairs of the Company and may include, but is not limited to, the following:

- changes in organizational structure, such as a reorganization, amalgamation etc.;
- changes in capital structure, including public and private sales of additional securities;
- changes in share ownership that may affect the control of the Company;
- changes in financial results;

- changes in business and operations, including changes in production and reserves;
- major acquisitions and dispositions, take-over bids and issuer bids;
- entering into or the loss of significant contracts;
- significant changes in management;
- significant litigation;
- firm evidence of significant increases or decreases in near-term earnings; and
- changes in credit arrangements, including the borrowing of a significant amount of funds.

In addition, Article 7(1)(a) of MAR defines "inside information", among other things as information of a precise nature, which has not been made public, relating directly or indirectly to one or more issuers or to one or more financial instruments, and which, if it were made public, would be likely to have a significant effect on the prices of either those instruments or related derivative financial instruments.

Information is of a "precise nature" if it indicates a set of circumstances that exists or may reasonably be expected to come into existence, or an event that has occurred or may reasonably be expected to occur, where it is specific enough to enable a conclusion to be drawn as to its possible effect on the price of the relevant instrument (Article 7(2) of MAR). In a protracted process, such as a merger and acquisition transaction or placing of shares, each intermediate step may constitute inside information. Each stage of those processes, therefore, needs to be considered to determine whether it constitutes inside information.

Under Article 7(4) of MAR, inside information is not only information that, were it to be made public, would have a significant effect on price, but is also information that a reasonable investor would be likely to use as part of the basis for investment decisions. It is not possible to prescribe how this reasonable investor test will apply in all possible situations. Any assessment may need to take into consideration the anticipated impact of the information in light of the totality of the Company's activities, the reliability of the source of the information and other market variables likely to affect the relevant financial instrument in the given circumstances (Recital 14 to MAR). Disclosure Guidance and Transparency Rules (the "**DTR**") issued by the UK Financial Conduct Authority ("**FCA**"), set out information which is likely to be considered relevant to a reasonable investor's decision (DTR 2.2.6) and this includes information which affects:

- the assets and liabilities of the Company;
- the performance, or the expectation of the performance, of the Company's business;
- the financial condition of the Company;
- the course of the Company's business;
- major new developments in the business of the Company; or
- information previously disclosed to the market.

It is the Committee's responsibility to determine what information is material in the context of the Company's affairs or otherwise constitutes inside information for the purposes of MAR. The Committee must take into account a number of factors in making judgments concerning the materiality of information.

Factors include the nature of the information itself, the volatility of the Company's securities and prevailing market conditions.

1. In complying with the requirement to disclose forthwith all material or inside information under applicable laws, regulations and stock exchange rules (including Section 408 of the TSX Rules, Article 17(1) of MAR, which provides that an issuer must inform the public as soon as possible of inside information, which directly concerns the issuer, and Nasdaq Listing Rule 5650(b), which requires the Company to make, except in unusual circumstances, prompt disclosure to the public of any material information that would reasonably be expected to affect the value of the Company's securities or influence investors' decisions), the Company will adhere to the following basic disclosure principles:

   (a) material information or inside information will be publicly disclosed immediately via news release, including an appropriate announcement to the AIM market via the Regulatory Information Service ("**RIS**"), the wording of which will be approved by all members of the Committee; and

   (b) notwithstanding the requirement in item (a), the Company shall only make such public disclosure after having consulted with the Company's nominated adviser, notified Market Surveillance, Nasdaq or any other specified regulatory authority of the forthcoming disclosure, to the extent required by applicable law or stock market rules including applicable AIM Rules, AIM Note, MAR, TSX Rules and Nasdaq Listing Rules.

2. In certain circumstances, the Committee may determine that such disclosure would be unduly detrimental to the interests of the Company (for example if release of the information would prejudice negotiations in a corporate transaction). In addition to compliance with Sections 423.1, 423.2 and 423.3 of the TSX Rules, according to Article 17(4) of MAR, disclosure of inside information may be delayed if all the following conditions are met:

   (a) immediate disclosure is likely to prejudice the legitimate interests of the Company;

   (b) the delay is not likely to mislead the public; and

   (c) the Company is able to ensure the confidentiality of that information.

   According to the guidelines issued by each of the European Securities and Markets Authority and the TSX, a non-exhaustive and indicative list of legitimate interests of issuers that are likely to be prejudiced by immediate disclosure of inside information includes the following circumstances:

   - ongoing negotiations conducted by the Company, where the status and/or outcome of such negotiations would likely be jeopardised by immediate public disclosure;

   - the financial viability of the Company is in grave and imminent danger, although not within the scope of the applicable insolvency law, and immediate public disclosure of the inside information would seriously prejudice the interests of existing and potential shareholders by jeopardising the conclusion of the negotiations aimed at ensuring the financial recovery of the Company;

   - the inside information relates to decisions taken or contracts entered into by the board of directors of the Company which need, pursuant to national law or the Company's constating documents, the approval of another body of the Company, other than the

shareholders' general meeting, in order to become effective, provided that all necessary conditions are met. The conditions are that: (i) immediate public disclosure of the information would jeopardise the correct assessment of the information by the public; (ii) an announcement explaining that the approval is still pending would jeopardise the freedom of decision of the relevant body; (iii) the Company arranged for the decision of the body responsible for such approval to be made, possibly, within the same day; and (iv) the decision is not expected to be in line with the decision of the board of directors;

- the Company has developed a product or an invention and the immediate public disclosure of that information is likely to jeopardise the intellectual property rights of the Company or, in relation to material information, would provide a competitor with confidential corporate information that would be of a significant benefit to them and the Company is of the opinion that the detriment to it resulting from such disclosure would outweigh the determent to the market in not having access to the information;

- in relation to material information the release of such information would prejudice the Company's ability to pursue specific and limited objectives or complete a transaction or a series of transactions that are under way;

- the Company is planning to buy or sell a major holding in another entity and the disclosure of such information would likely jeopardise the conclusion of the transaction; or

- a deal or transaction previously announced is subject to a public authority's approval, and such approval is conditional upon additional requirements, where the immediate disclosure of those additional requirements will likely affect the ability for the Company to meet them and therefore prevent the final success of the deal or transaction.

If all of the conditions set out in (a) to (c) above are met and the Company has complied with the TSX Rules and MAR, the inside information will be kept confidential until the Committee determines it appropriate to publicly disclose, provided that earlier disclosure of such information is not required by applicable law or applicable rules of the TSX, Nasdaq or AIM. In such circumstances, the Committee will cause a confidential material change report to be filed with the applicable Canadian securities regulators, and will periodically review (as frequently as required and at least every 10 days) its decision to keep the information confidential (also see – *Rumours*).

If the Company delays the disclosure of inside information, the Committee will record the date and time the inside information first existed, the date and time the decision to delay was taken, who made that decision and evidence of fulfilment of the conditions permitting the delay. When the inside information is announced, the Committee must then privately notify the FCA of the delay, when the decision was taken and who took the decision. The FCA may request a written explanation of how conditions (a) to (c) above were met. As at the date on which this disclosure policy is adopted, communications with the FCA in respect of delayed disclosure are made via the FCA's Electronic Submission System ("**ESS**"), accessible at https://www.fca.org.uk/markets/ukla/contact/submit-documents-electronically. At least two members of the Committee should be registered for access to the ESS at all times.

3. The Committee may additionally consider that, where the Company is faced with an unexpected and significant event, a short delay to disclosure of material or inside information may be acceptable if it is necessary to clarify the situation, following the guidance set out in DTR 2.2.9 G(2) and the TSX Rules, provided that earlier disclosure of such information is not required by applicable law or applicable rules of the TSX, Nasdaq or AIM.

4. Disclosure of material or inside information should not be delayed where delay of disclosure is likely to mislead the public. A non-exhaustive and indicative list of situations in which delay of disclosure is likely to mislead the public includes the following circumstances:

   (a) the information whose disclosure the Company intends to delay is materially different from the previous public announcement of the Company on the matter to which the information refers;

   (b) the information whose disclosure the Company intends to delay relates to the fact that the Company's financial objectives are not likely to be met, where such objectives were previously publicly announced; or

   (c) the information whose disclosure the Company intends to delay is in contrast with the market's expectations, where such expectations are based on signals that the Company has previously sent to the market, such as interviews, roadshows or any other type of communication organised by the Company or with its approval.

   The Company will not generally be required to immediately disclose the impact of external political, economic and social developments on its affairs, unless an external development will have or has had a direct effect on the business and affairs of the Company that is both material and uncharacteristic of the effect generally experienced by other companies engaged in the same business or industry. In such a circumstance, prompt disclosure of such external development and the Company's interpretation of its impact on the Company's affairs will be made.

5. In areas where the Company has joint venture partners, the Committee will inform the joint venture partners of a material information disclosure prior to its release, subject to appropriate confidentiality obligations. Should any joint venture partner release information that pertains to the Company, the Committee should immediately determine if the information is material or constitutes inside information for the purposes of MAR. If the information is determined to be material to the Company or constitute inside information, the Committee should immediately disclose the information via news release, including an appropriate announcement via RIS.

6. Disclosure must include any information the omission of which would make the rest of the disclosure misleading (half-truths are misleading).

7. Unfavourable material information must be disclosed as promptly and completely as favourable information.

8. No selective disclosure. Previously undisclosed material information must not be disclosed to selected individuals (for example, in an interview with an analyst or in a telephone conversation with an investor). If previously undisclosed material or inside information has been inadvertently disclosed to an analyst or any other person in necessary cause of business and not bound by an express confidentiality obligation, such information must be broadly disclosed immediately via news release.

   However, note that under MAR (Article 17(8)) selective disclosure of inside information may be permitted when the Company delays disclosure to the market, but only where the recipient of information owes a duty of confidentiality to the Company and requires the information to carry out its duties to the Company. This might include disclosure to the Company's advisers, underwriters, statutory or regulatory bodies or authorities, lenders or credit rating agencies.

The above list of persons is not exhaustive. Selective disclosure to any of the above persons may not automatically be justified in every circumstance where the Company delays disclosure. The wider the group of recipients of inside information, the greater the likelihood of a leak that will trigger the need for public disclosure. If the Company selectively discloses information to any person, it should prepare a holding announcement which can be released as soon as possible if there is a leak (as noted in the guidance set out in DTR 2.6.3G). Paragraph 10 below is to be referred to for further detail in relation to holding announcements.

9. Disclosure on the Company's website alone does not constitute adequate disclosure of material or inside information. As required by the TSX and Nasdaq, upon which the common shares of the Company are listed, material information is put into a press release. In addition, as a result of the common shares of the Company being listed for trading on AIM, Article 17(1) of MAR requires that inside information that directly concerns it be disclosed as soon as possible via RIS.

10. Where the Company delays the disclosure of inside information and/or discloses information selectively, the Company may be required to make a holding news release and announcement and/or request that trading on the relevant stock exchange(s) be temporarily suspended until the Company is in a position to make the appropriate news release and announcement.

    A holding announcement should also be made where the Company believes that there is a danger that inside information will leak.

    A holding announcement should contain as much detail of the subject matter as possible, the reasons why a fuller announcement could not be made and an undertaking to announce further details as soon as possible.

    In cases of doubt as to the timing of announcements required under Article 17 of MAR, the Committee will consult the FCA at the earliest opportunity.

11. If the TSX or Nasdaq is open for trading at the time of a proposed announcement containing material or inside information, the market surveillance department of the Investment Industry Regulatory Organization of Canada ("**IIROC**") will be contacted and sign-off obtained prior to the issuance of a news release announcing material information.

12. The Committee must bear in mind the Company's obligations of disclosure to and consultation with the Company's AIM nominated adviser ("**Nomad**") in relation to material and inside information and its disclosure to the market.

Disclosure must be corrected immediately if the Company subsequently learns that earlier disclosure by the Company contained a material error at the time it was given.

DISCLOSURE CONTROLS AND PROCEDURES

The Committee shall establish procedures which shall be adhered to by the Company and its employees for the preparation of all disclosure statements, and, wherever practicable, their review by such personnel, the auditors and external legal counsel, as the Committee may determine and, ultimately their dissemination in compliance with this disclosure policy. In addition to reviewing all disclosure statements, the Committee may employ questionnaires to directors and officers, formal or informal due diligence sessions, certifications of officers and involvement of experts. The Committee may elect to, at any time, adopt controls and procedures that are different than those which have been previously established, provided that such controls and procedures are, in the opinion of the Committee, satisfactory to ensure

that disclosure statements are disclosed in compliance with this disclosure policy and the rules and guidance of applicable regulatory authorities.

The U.S. Securities and Exchange Commission (the "**SEC**") defines "disclosure controls and procedures" as controls and other procedures of an issuer that are designed to ensure that information required to be disclosed by the issuer in the reports that it files or submits under the Securities Exchange Act of 1934, as amended (the "**Exchange Act"**) is recorded, processed, summarized and reported, within the time periods specified in the SEC's rules and forms. Disclosure controls and procedures include, without limitation, controls and procedures designed to ensure that information required to be disclosed by an issuer in the reports that it files or submits under the *Exchange Act* is accumulated and communicated to the issuer's management, including its Chief Executive Officer and Chief Financial Officer, or persons performing similar functions, as appropriate to allow timely decisions regarding required disclosure.

The Committee, as further detailed in the mandate of the Committee, will assist in the development of disclosure controls and procedures and, as requested by the Chief Financial Officer, will assist in the evaluation of periodic reports prepared for filing with the SEC in order to facilitate the certifications required to be given by the Chief Executive Officer and Chief Financial Officer in connection with such reports as to the design and effectiveness of the Company's disclosure controls and procedures.

TRADING RESTRICTIONS AND BLACKOUT PERIODS

It is illegal for anyone to purchase or sell securities of any public company with knowledge of material information affecting the Company that has not been publicly disclosed. Except in the necessary course of business and under an appropriate duty of confidentiality, it is also illegal for anyone to inform any other person of material non-public information. Therefore, insiders and employees with knowledge of confidential or material information about the Company or counter-parties in negotiations of material potential transactions are prohibited from trading shares in the Company or any counter-party until the information has been fully disclosed and a reasonable period of time has passed for the information to be widely disseminated. The Share Dealing Policy sets out further requirements and practices in relation to dealing in the Company's shares and is to be referred to in all cases.

Without limiting the effect of the Share Dealing Policy, it is the officer, director or employee's responsibility to determine prior to trading in securities of the Company whether they are aware of any material fact or material change which significantly effects or would reasonably be expected to have a significant effect on the market price or value of the Company's securities.

Blackout periods for the first, second and third quarters occur beginning on the 1st day following the reporting period and lasting until one full trading day following disclosure of the results for the applicable quarters, unless the Committee requests the blackout period to commence earlier. Blackouts for the fourth quarter and year-end are determined by the Committee. Blackout periods may also be prescribed from time to time by the Committee as a result of special circumstances relating to the Company when directors, officers, employees or certain other persons would be precluded from trading in its securities, including when it becomes reasonably probable that inside information will be required by the AIM Rules or MAR to be notified or otherwise when a Close Period (as defined in the Share Dealing Policy) is continuing. All parties with knowledge of such special circumstances should be covered by the blackout. The fact that a trading blackout has been imposed should not be discussed with other parties. These parties may include external advisors such as legal counsel, investment bankers, and other professional advisors, and counter-parties in negotiations of material potential transactions. The Committee will send a notice to all persons that it determines to be blacked out. For confidentiality purposes, the Committee may determine that the reasons for the blackout are not to be given. Such blackout period will last until

one full trading day following disclosure of the material or inside information. In extraordinary circumstances, the Committee may grant a waiver of the blackout period to a director, officer or employee. The Share Dealing Policy contains further detail in relation to Close Periods and should be referred to in all cases.

In addition, when the Company is conducting a prospectus offering, private placement, issuer bid, an amalgamation, arrangement or other similar transaction involving the Company securities or a takeover bid for another entity where securities of the Company are offered as consideration (the "**Restricted Event**"), no insider of the Company shall bid for or purchase (or induce others to) the type of the Company securities that are offered in that transaction, except when permitted by applicable law, including, where applicable, the AIM Rules and MAR.

All parties including staff, consultants, directors and third parties will be informed via email of the start of a blackout period and again at its termination.

Blackout notices are provided to the third-party administrator of the Company's stock based compensation plan.

QUIET PERIODS

In order to limit the potential for selective disclosure (and the perception or appearance of selective disclosure), the Company will observe a "quiet period" during which time there will be no contacts with analysts or investors (other than responding to unsolicited inquiries regarding factual matters), no earnings guidance will be provided to anyone, and no comments will be provided on analysts' earnings or other estimates or any other comments with respect to current operations, financial performance or other expected results. This quiet period will normally coincide with a blackout period prior to quarterly or annual earnings announcements or when material changes are pending. Additional quiet periods may be established from time to time by the Company as a result of special circumstances relating to the Company. The existence of a special purpose quiet period will be communicated by a means approved by the Committee.

If the Company is invited to participate during a quiet period in investment meetings or conferences organized by others, the Committee will determine, on a case-by-case basis, if it is advisable to accept these invitations. If accepted, caution will be exercised to avoid selective disclosure of any undisclosed material or inside information.

MAINTAINING CONFIDENTIALITY

Any employee privy to confidential information is prohibited from communicating such information to anyone else, unless it is necessary to do so in the course of business and subject to an appropriate duty of confidentiality. Efforts will be made to limit access to such confidential information to only those who need to know the information and such persons will be advised that the information is to be kept confidential.

Outside parties privy to undisclosed material information concerning the Company will be told that they must not divulge such information to anyone else, other than in the ordinary course of business and that they may not trade in the Company's securities until the information is publicly disclosed. Such outside parties will confirm their commitment to non-disclosure in the form of a written confidentiality agreement.

The Company will maintain a list of all persons who have access to inside information and are working for it under a contract of employment or otherwise performing tasks through which they have access to

inside information. Each person on this insider list will be required to acknowledge in writing the legal and regulatory duties entailed and their awareness of the civil sanctions applicable to insider dealing and the unlawful disclosure of inside information. The Share Dealing Policy should be referred to for the form and contents of the notice to be provided to a person added to the insider list and of the acknowledgement required from such a person.

The insider list, which must be in electronic format, may follow one of two templates, depending on whether the Company has identified "permanent insiders" (those who have access to all inside information at all times). The list will contain as many sections as there are different categories of inside information, whether deal-specific or event-based. Each section of the insider list must include certain prescribed information, including the identity of each person with access to the relevant inside information, the reason they are on the insider list and the date and time at which they obtained access to the inside information. The Company is ultimately responsible for the maintenance of the insider list which is drawn up by a person acting on the Company's behalf or on its account. The Company will always retain a right of access to the insider list. The insider list must be kept for at least five years after it was drawn up or updated.

In order to prevent the misuse or inadvertent disclosure of material information, the procedures set forth below should be observed at all times:

1. Documents and files containing confidential information should be kept in a safe place to which access is restricted to individuals who "need to know" that information in the necessary course of business and code names should be used if necessary.

2. Confidential matters should not be discussed in places where the discussion may be overheard, such as elevators, hallways, restaurants, airplanes, company automobiles or shared vehicles.

3. Confidential documents should not be read (including on computers, cell phones or other electronic devices) or displayed in public places and should not be discarded where others can retrieve them.

4. Employees must ensure they maintain the confidentiality of information in their possession outside of the office as well as inside the office.

5. Transmission of documents by electronic means, such as by fax, email or directly from one computer to another, should be made only where it is reasonable to believe that the transmission can be made and received under secure conditions, such as password protected wi-fi networks. If doubt exists as to whether secure conditions exist, emails and their attachments should be encrypted or password protected.

6. Unnecessary copying of confidential documents should be avoided and documents containing confidential information should be promptly removed from conference rooms and work areas after meetings have concluded. Extra copies of confidential documents should be shredded or otherwise destroyed.

7. Access to confidential electronic data should be restricted through the use of passwords.

8. To the extent possible, use code names in documents to protect the identity of the parties involved, including the Company.

9. Confidential electronic data stored on remote servers should be stored in secure files, where access is restricted to individuals as approved by senior management and or the Committee.

CONFIDENTIAL MATERIAL INFORMATION

In certain circumstances, the Committee may determine that disclosure of certain information constituting a material change would be unduly detrimental to the Company (for example, if releasing the information would prejudice negotiations in a corporate transaction). In such cases, the Committee may determine that the disclosure of such information may be delayed in compliance with the procedures and rules set forth under "Principles of Disclosure of Material or Insider Information" in this disclosure policy.

Where disclosure of a material change is delayed, the Company must maintain complete confidentiality. During the period before a material change is disclosed, market activity in the Company's securities should be carefully monitored. Any unusual market activity may mean that news of the matter has been leaked and that certain persons are taking advantage of it. If the confidential material change, or rumors about it, have leaked or appear to be impacting the price of the securities, the Company should immediately take steps to ensure that a full public announcement is made. This would include contacting the relevant stock exchange and asking that trading be halted pending the issuance of a news release, including an announcement via RIS.

Where a material change is being kept confidential, persons with knowledge of the material change may not use such information in purchasing or selling its securities. Such information should not be disclosed to any person, except in the necessary course of business and subject to an appropriate duty of confidentiality. If the Company discloses material information in the necessary course of business, it should make sure that those receiving the information (i) understand that they are now in a "special relationship" with the Company and cannot pass the information on to anyone else (other than in the necessary course of business), or trade on the information, until it has been generally disclosed, and (ii) enter into an appropriate confidentiality agreement with the Company.

DESIGNATED SPOKESPERSONS

The Company designates a limited number of spokespersons responsible for communication with the investment community, regulators or the media. The Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, In-Country Managers and the Company’s public relations firm shall be the official spokespersons for the Company. The Committee may, from time to time, designate others within the Company to speak on behalf of the Company as back-ups or to respond to specific inquiries.

Employees who are not authorized spokespersons must not respond under any circumstances to inquiries from the investment community, the media or others, unless specifically asked to do so by an authorized spokesperson, or unless the response is limited to providing investors with copies of information which had already been disseminated, such as press releases or financial statements. All other inquiries shall be referred to the Company’s public relations firm.

NEWS RELEASES

Once the Committee determines that a development is material, it will authorize the issuance of a news release (including an appropriate announcement via RIS), unless the Committee determines that such developments must remain confidential for the time being, appropriate confidential filings are made and control of that inside information is instituted. Should a material statement inadvertently be made in a selective forum, the Company will immediately issue a news release (including an appropriate announcement via RIS) in order to fully disclose that information.

The Committee may also authorize the issuance of a news release that is determined to be non-material.

Prior notice of a news release announcing material information may be required to be provided to the TSX, Nasdaq and/or AIM, in particular to enable the market surveillance department of the relevant stock market to enable a trading halt, if deemed necessary by the TSX, Nasdaq and/or AIM, respectively. In each case, such prior notice is to be given in accordance with the rules of the TSX, Nasdaq and/or the AIM Rules, respectively.

Even if a news release announcing material information is issued outside of trading hours, to the extent not required by the applicable rules of the stock market, a copy of the news release should still be transmitted to the respective stock exchange's market surveillance department.

Annual and interim financial results will be publicly released as soon as practicable following board approval of the financial statements.

News releases will be disseminated through an approved news wire service that provides simultaneous national and U.S. distribution unless simultaneous dissemination is in breach of the UK, Canadian or U.S. securities laws or regulations. News releases will be transmitted by the approved news wire service to all stock exchange members, major business wires and national financial media. The Company will cause the news release to be filed with the Canadian securities commissions via the System for Electronic Document Analysis and Retrieval ("**SEDAR**") in accordance with Canadian securities laws and promptly thereafter with the U.S. Securities and Exchange Commission via the Electronic Data Gathering, Analysis, and Retrieval System ("**EDGAR**") in accordance with applicable U.S. securities laws. In addition, an appropriate announcement will be made to the AIM market via RIS, no later than it is published on SEDAR, via EDGAR or elsewhere (Rule 10 of the AIM Rules).

Where it is proposed to announce at any meeting of shareholders information which might lead to significant movement in the price of those securities, arrangements will be made for notification of that information via appropriate news release and announcement, so that the disclosure at the meeting is made no earlier than the time at which the information is notified to the relevant markets.

News releases will be posted on the Company's website immediately after release over the news wire. The news release page of the website shall include a notice advising the reader that the information posted was accurate at the time of posting, but may be superseded by subsequent news releases.

SHARE BUY-BACKS AND STABILIZATION

Where required, the Committee will consider the relevant rules and obtain the appropriate advice in relation to any buy-back of the Company's securities or stabilization of market in them. The provisions of MAR may be applicable to such transactions, although certain safe harbors may be available.

CONFERENCE CALLS

Conference calls may be held to enable management to discuss quarterly earnings and major corporate developments. Conference calls shall be simultaneously accessible to all interested parties, whether they actively participate by telephone, or merely listen in by telephone or through an Internet webcast. Each such call will be preceded by a news release (including an appropriate announcement via RIS), setting out relevant material or inside information. In advance of a conference call or industry conference call, to the extent practicable, the Company will endeavour to script comments to identify material information that should be publicly disclosed and will limit comments and responses to non-material information, which does not constitute inside information for the purposes of MAR and information that has previously been publicly disclosed.

The Committee may hold a debriefing meeting immediately after the conference call and if such debriefing uncovers selective disclosure of previously undisclosed material or insider information, the Company will immediately disclose such information broadly via press release.

RUMOURS

The Company does not comment, affirmatively or negatively, on rumours. This also applies to rumours on the Internet. The Company's spokespersons will respond consistently to those rumours, saying, "It is our policy not to comment on market rumours or speculation." Should the TSX, Nasdaq, the FCA or the Nomad request that the Company make a definitive statement in response to a market rumour that is causing significant volatility in the stock, the Committee will consider the matter and decide whether to make a policy exception. If the rumour is true in whole or in part, the Company will immediately issue a news release (including an appropriate announcement via RIS) disclosing the relevant material information.

CONTACTS WITH ANALYSTS, INVESTORS AND THE MEDIA

Disclosure in individual or group meetings does not constitute adequate disclosure of information that is considered material non-public information or inside information. If the Company intends to discuss material or inside information at an analyst or shareholder meeting or a press conference or telephone call, the announcement must be preceded by a news release (including an appropriate announcement via RIS).

The Company recognizes that meetings with analysts and significant investors are an important element of the Company's investor relations program. The Company will meet with analysts and investors on an individual or group basis as needed and will initiate contacts or respond to analyst and investor calls in a timely, consistent and accurate fashion in accordance with this disclosure policy.

The Company will provide only non-material information, which does not constitute inside information for the purposes of MAR, through individual and group meetings, in addition to regular publicly disclosed information, recognizing that an analyst or investor may construct this information into a mosaic that could result in material information. The Company cannot alter the materiality of information by breaking down the information into smaller, non-material components.

Spokespersons will keep notes of telephone conversations with analysts and investors and where practicable more than one Company representative will be present at all individual and group meetings. A debriefing will be held after such meetings and if such debriefing uncovers selective disclosure of previously undisclosed material information, the Company will immediately disclose such information broadly via news release (including an appropriate announcement via RIS).

REVIEWING ANALYST DRAFT REPORTS AND MODELS

It is the Company's policy to review, upon request, analysts' initial draft research reports or models. The Company will review the report or model for the purpose of pointing out errors in fact based on publicly disclosed information. It is the Company's policy, when an analyst inquires with respect to his/her estimates, to question an analyst's assumptions if the estimate is a significant outlier among the range of estimates and/or the Company's published earnings guidance, if any. The Company will limit its comments in responding to such inquiries to non-material information, which does not constitute inside information for the purposes of MAR. The Company will not confirm, or attempt to influence, an analyst's opinions or conclusions and will not express comfort with the analyst's model and earnings estimates.

So as not to endorse an analyst's report or model, the Company will, to the extent possible, provide its comments orally or will attach a disclaimer to written comments to indicate the report was reviewed only for factual accuracy.

DISTRIBUTING ANALYST REPORTS

Analyst reports are proprietary products of the analyst's firm. Re-circulating an analyst's report may be viewed as an endorsement by the Company of the report. For these reasons, the Company will not provide analyst reports through any means to persons outside of the Company, including posting such information on its website. The Company has determined that a range of firms provide commentary about the Company, not all of which firms are members of IIROC or the Financial Industry Regulatory Authority, and the quality of such commentary varies. The Company limits references to analyst reports on its website to a list of the analysts' names and houses they work for.

The Company may distribute analyst reports internally to: (i) directors and senior officers; and (ii) the Company's financial and professional advisors.

The Company, with the explicit permission of the publishing analyst, would be permitted to utilize published analyst materials that are historical or benchmarking in nature.

FORWARD-LOOKING INFORMATION

Should the Company elect to disclose forward-looking information ("**FLI**") in continuous disclosure documents, speeches, telephone calls, etc. the following guidelines will be observed:

1. The information, if deemed material or inside information, will be broadly disseminated via news release (including an appropriate announcement via RIS), in accordance with this disclosure policy.

2. The information will be clearly identified as forward-looking.

3. The information will be published only if there is a reasonable basis for drawing the conclusions or making the forecast and projections and will be clearly identified as forward-looking.

4. The Company will identify all material assumptions used in the preparation of the FLI.

5. The information will be accompanied by a statement that identifies, in very specific terms, the risks and uncertainties that may cause the actual results to differ materially from those projected in the statement, including a sensitivity analysis to indicate the extent to which different business conditions from the underlying assumptions may affect the actual outcome.

6. Public oral statements also require a statement that actual results could differ materially and a reference to material factors and assumptions that could cause actual results to differ materially and that such factors or assumptions are contained in a readily available document.

7. The information will be accompanied by a statement that disclaims the Company's intention or obligation to update or revise the FLI, whether as a result of new information, future events or otherwise, other than as required by law. Notwithstanding this disclaimer, should subsequent events prove past statements about current trends to be materially off target, the Company may choose to issue a news release explaining the reasons for the difference. In this case, the Company will update its guidance on the anticipated impact on revenue and earnings (or other key metrics).

8. The information relating to reserves or resources (both discovered and undiscovered), will be prepared by a qualified reserves evaluator ("**QRE**") in accordance with National Instrument 51-101 – *Standards of Disclosure for Oil and Gas Activities*. If the QRE does not qualify as a Competent Person (or "**CP**") for the purposes of the AIM Note, such information is to be reviewed and signed off by a CP in accordance with the AIM Note.

If the Company has issued FLI covered by Part 4A or Part 4B or National Instrument 51-102 – *Continuous Disclosure Obligations* ("**NI 51-102**"), or a successor instrument thereto, the Company will endeavor to comply with Parts 4A and 4B of NI 51-102 including updating that FLI periodically, as required by Section 5.8(2) of NI 51-102 or any successor policy or instrument.

Should the Company determine during the quarter that earnings, production volumes or other operating results will be significantly out of the range of the current estimates (particularly if any of these items will likely be below the range), the Company may consider issuing a broadly disseminated press release, followed by individual or group calls to analysts and significant investors, at management's discretion, explaining this and the reason or reasons why. This would be done to avoid "earnings surprises" to the extent possible.

In all cases, the Company will comply with the requirements of the AIM Rules, the AIM Note, as well as with applicable UK and U.S. securities laws and applicable Nasdaq rules.

CORRECTING DISCLOSURE

Any director, officer or employee of the Company who believes that any public disclosure of the Company, including any documents released by the Company or any public oral statements, contains a misrepresentation shall promptly notify a member of the Committee of such misrepresentation, and such member shall inform the board of directors and take appropriate steps to immediately correct such misrepresentation. In addition, any director, officer or employee who has concerns about whether or not information is undisclosed material information, should contact a member of the Committee in respect of such matter.

MANAGING EXPECTATIONS

The Company will try to ensure, through its regular public dissemination of quantitative and qualitative information, that analysts' estimates are in line with the Company's own expectations. The Company will not confirm, or attempt to influence, an analyst's opinions or conclusions and will not express comfort with analysts' models and earnings estimates.

If the Company has determined that it will be reporting results materially below or above publicly held expectations, it will disclose this information in a news release (including an appropriate announcement via RIS) in a timely fashion in order to enable discussion without risk of selective disclosure.

MANNER OF DISCLOSURE AND DISCLOSURE RECORD

To comply with the disclosure requirements under Article 17(1) of MAR, the Company will ensure that inside information is made public in a manner that enables fast access and complete, correct and timely assessment of the information by the public, including making an appropriate announcement via RIS.

Disclosure of inside information to the public should not be combined with the marketing of the Company's activities. The communication of inside information must clearly identify:

- that the information communicated is inside information;

- the Company’s full legal name;
- the name, surname and position within the Company of the person making the notification;
- the subject matter of the inside information; and
- the date and time of the communication to the media.

In relation to the first bullet requiring that a communication clearly identifies that the information communicated is inside information, in some cases where an announcement includes some items that are inside information, even if it includes other information that is not, it may be sufficient to include a general reference such as "This announcement contains inside information for the purposes of Article 7 of the Market Abuse Regulation (EU) No 596/2014" or similar. Where the announcement covers a number of clearly different matters that could have been the subject of separate announcements, it would be appropriate to distinguish between those matters that comprise inside information and those that do not. It is, however, important that inside information within the announcement is not concealed (such as, buried in with large amounts of non-inside information).

The Company will maintain a five-year file containing all public information about the Company, including continuous disclosure documents and news releases. The Company will post and maintain on its website for at least five years all inside information it is required to disclose publicly.

RESPONSIBILITY FOR ELECTRONIC COMMUNICATIONS

This disclosure policy also applies to electronic communications. Accordingly, officers and personnel responsible for written and oral public disclosures shall also be responsible for electronic communications.

The Committee is responsible for updating the Company’s website and is responsible for monitoring all Company information placed on the website to ensure that it is accurate, complete and up-to-date.

The Committee must approve all links from the Company website to a third party website. Every attempt will be made to limit the number of such links.

Investor relations material shall be contained within a separate section of the Company’s website and shall include a notice that advises the reader that the information posted was accurate at the time of posting, but may be superseded by subsequent disclosures. All data posted to the website, including text and audiovisual material, shall show the date such material was issued. Any material changes in information must be updated immediately.

Disclosure on the Company’s website alone does not constitute adequate disclosure of information that is considered material non-public information. Any disclosures of material information on its website will be preceded by the issuance of a news release (including an appropriate announcement via RIS). The Company will, however, endeavour to concurrently post to its website all documents filed on SEDAR and EDGAR and/or via RIS in an effort to improving investor access to its information.

The TSX Rules will be complied with and apply to all of the Company's electronic communications.

The Committee and the public relations firm shall be responsible for responses to electronic inquiries. Only public information or information which could otherwise be disclosed in accordance with this disclosure policy shall be utilized in responding to electronic inquiries.

In order to ensure that no material undisclosed information or inside information is inadvertently disclosed, employees are prohibited from participating in Internet chat rooms, newsgroup discussions or social media on matters pertaining to the Company's activities or its securities. Employees who encounter such discussions pertaining to the Company should advise a member of the Committee immediately, so that the discussion can be monitored.

Each employee's corporate e-mail address is, in fact, an address of the Company. Therefore, all correspondence received and sent by e-mail is to be considered correspondence of the Company.

COMMUNICATION AND ENFORCEMENT

This disclosure policy extends to all employees and consultants of the Company, its board of directors and authorized spokespersons. New directors, officers and employees will be provided with a copy of this disclosure policy and will be educated about its importance. This disclosure policy will be circulated to all employees on an annual basis and whenever changes are made.

Any person who violates this disclosure policy may face disciplinary action up to and including termination of his or her employment with the Company without notice. The violation of this disclosure policy may also violate certain securities laws. If it appears that an employee may have violated such securities laws, the Company may refer the matter to the appropriate regulatory authorities, which could lead to penalties, fines or imprisonment.