



WENTWORTH
RESOURCES LIMITED

PRIVACY POLICY

JUNE 27, 2016

WENTWORTH RESOURCES LIMITED

PRIVACY POLICY

The Board of Directors (the "**Board**") of Wentworth Resources Limited ("**Wentworth**", the "**Corporation**" or "Company") has adopted this Privacy Policy Code of Ethics and Business Conduct (the "**Code**") which is designed to provide guidance which will ensure the Corporation respects and is committed to protecting the privacy of all individual personal information which is collected, used and disclosed during the conduct of its business.

1. DEFINITION

1.1. Wentworth includes the following legal entities:

- 1.1.1. Wentworth Holdings (Jersey) Limited;
- 1.1.2. Wentworth Tanzania (Jersey) Limited;
- 1.1.3. Wentworth Gas (Jersey) Limited;
- 1.1.4. Wentworth Gas Limited;
- 1.1.5. Wentworth Mozambique (Mauritius) Limited; and
- 1.1.6. Wentworth Moçambique Petróleos, Limitada.

1.2. Personal Information means information about an Identifiable Individual (defined as current or prospective employees, Board of Director members, consultants or vendors, and/or shareholders) which includes but is not limited to:

- 1.2.1. Employees' home address, home phone number, age, gender, marital status, income, financial information and personal history.
- 1.2.2. Employee or consultant bank account and social security numbers.
- 1.2.3. Employee or consultant personnel records including payroll/ accounting records, evaluations or disciplinary actions.
- 1.2.4. Candidate person information collected during the course of recruitment including educational and career history, personal references, information gathered through background checks are subject to the candidate's consent.
- 1.2.5. Candidate resumes received during the recruitment process must not be distributed to others outside the organization without the candidate's knowledge.
- 1.2.6. Consultant and vendor contact, contract, invoicing and payment information (for consultants and vendors who are individuals).
- 1.2.7. Shareholder registry, share transaction information and shareholder communications (for shareholders who are individuals).
- 1.2.8. Board member travel and accommodation information, curriculum vitae and related information.

- 1.3. Personal Information does not include the name, title, business address, business telephone number, fax or e-mail of the Identifiable Individual of the Company during the course of normal business operations.

2. PURPOSES FOR COLLECTION, USE AND DISCLOSURE OF PERSONAL INFORMATION

- 2.1. Employee, Vendor and Consultant Personal Information is generally collected, used or disclosed for managing and planning the relationship with Wentworth and includes but is not limited to the following:

- 2.1.1. Ensuring the safety and security of personnel and physical assets (e.g. building access cards and usage);
- 2.1.2. Determining eligibility for initial employment or hire for services;
- 2.1.3. Administrating payroll and benefits, paying consultant invoices;
- 2.1.4. Reporting statutory income tax information and source deductions;
- 2.1.5. Managing employee professional development and performance;
- 2.1.6. Administering benefit plan enrolment and claims;
- 2.1.7. Corporate public communications, including photographs, and reporting required by securities laws applicable to where the Company's securities are traded; and
- 2.1.8. Other reasonable purposes in order to effectively manage or administer the personnel, vendor or consultant relationship.

- 2.2. Board of Director Member Personal Information is collected, used or disclosed:

- 2.2.1. Recruit and managing appointments to the Board of Directors;
- 2.2.2. Administer Board of Director travel, accommodation and expenses incurred on behalf of Wentworth; and
- 2.2.3. Corporate public communications, including photographs, and reporting required by securities laws applicable to where the Company's securities are traded.

- 2.3. Shareholder Personal Information is collected, used and disclosed:

- 2.3.1. Administering the Wentworth share registry and record share transactions;
- 2.3.2. Disclosing significant shareholdings, share and option transactions of individual shareholders for corporate reporting and securities regulatory purposes, including, but not confined to, insider trading reporting, as required by securities laws applicable to where the Company's securities are traded; and
- 2.3.3. Maintaining a branch share registry in Guernsey that records all Wentworth share transactions outside Canada. The share registry is required to process personal information regarding Wentworth share transactions in accordance with applicable securities laws, is contractually prohibited from using or disclosing personal information

about shareholders for any other purpose, except as required by law, and is required to protect shareholder information from unauthorized access, processing, theft or accidental loss or destruction. Information held by the share registry may be accessible or required to be disclosed to authorized regulators or law enforcement under the laws of Guernsey. Individuals may contact Wentworth for information about its use of service providers outside Canada for the collection, use and disclosure or storage of personal information by writing to the company at: Wentworth Resources Limited, Attention: Chief Financial Officer, 3210, 715 - 5th Avenue SW, Calgary, Canada, T2P 2X6.

- 2.4. Wentworth may engage third party service providers to process or use personal information on its behalf, such as in order to provide or administer benefits, or arrange travel and accommodations. Wentworth requires service providers to comply with Canadian or similar privacy laws, protect personal information transferred to them and prohibits service providers from using personal information for any purpose except providing the services. The Identifiable Individual will be informed about the information that is to be provided to third party services providers.
- 2.5. Wentworth also reserves the right to disclose and/or transfer personal information to a third party in the event of a proposed or actual purchase, sale (including a liquidation, realization, foreclosure or repossession), lease, merger, amalgamation or any other type of acquisition, disposal, transfer, conveyance or financing, including taking a security interest in respect of, of all or any portion of Wentworth or of any of the business or assets or shares of Wentworth or a division thereof (“business transaction”), for the continued use and disclosure of the personal information for the purposes it was originally collected and to carry out the business, activity or the objects of the business transaction.
- 2.6. Personal Information will only be used or disclosed by Wentworth for the purposes for which it was collected. Information collected is to be restricted to only information necessary for the purposes of its collection, use or disclosure.

3. CONSENT

- 3.1. Wentworth will provide notice to employees of its collection, use and disclosure of Employee Personal Information for purposes other than those described in this Privacy Policy, except in respect of collection, use and disclosure permitted without notice under privacy laws.
- 3.2. Wentworth will provide notice and obtain the consent of consultants, vendors, Board of Director members and shareholders for collection, use and disclosure of personal information other than that described in this Privacy Policy, except as permitted or required by applicable privacy laws.
- 3.3. Examples of the purposes for which Wentworth will disclose personal information without consent include:
 - 3.3.1. in emergencies that threaten safety, life or health of an individual or the public;
 - 3.3.2. as required by workplace, securities and investment regulators;
 - 3.3.3. in investigations to detect, prevent or suppress fraud;
 - 3.3.4. to protect the company from illegal actions against it or from breaches of its agreements with individuals or third parties;

- 3.3.5. where reasonable for purposes of a legal proceeding;
- 3.3.6. in response to lawful requests of law enforcement bodies; and
- 3.3.7. as otherwise authorized or required by law.

4. SAFEGUARDS

- 4.1. Wentworth personnel who are involved in dealing with personal information about identifiable individuals must ensure all personnel files and records are protected and safeguarded. This includes:
 - 4.1.1. Locking filing cabinets and desks, restricting access to personnel, consultant or vendor files and records other than those directly involved in the processing of such information;
 - 4.1.2. Implementing and applying information technology security such as computer passwords and encryption where appropriate;
 - 4.1.3. All Wentworth personnel who access confidential personal information in the course of their regular duties must keep such information confidential; and
 - 4.1.4. All personnel records must be centralized in a secure location. Managers and supervisors must not retain personnel records or desk files regarding employees.

5. INDIVIDUAL ACCESS AND ACCURACY

- 5.1. Wentworth will endeavour to keep personal information accurate. It is the employee's, vendor's or consultant's responsibility to notify Wentworth of any change to home address or bank account details or details Wentworth requires, such as anything that may affect an employee's benefit and payroll program or a consultant/ vendor's billing and invoice payment.
- 5.2. Upon request, any Wentworth employee or consultant may request to access and review their own personnel file, and consultants, vendors, shareholders and Board of Director members may request access to personal information that Wentworth holds about them.
- 5.3. Wentworth may refuse to provide access to personal information, for example if the information is subject to a legal privilege or was collected for a legal or arbitral proceeding, if disclosure of the information would threaten safety, if disclosure would reveal confidential commercial or financial information or if access may or is required to be refused by law.
- 5.4. Employees may not remove any documentation without prior authorization from the Manager of Human Resources, but making copies is acceptable.
- 5.5. Wentworth will correct personal information containing an error or omission, will notify third parties of such corrections where it is reasonable to do so and will annotate personal information with notes of corrections requested but no made.

6. ACCOUNTABILITY

- 6.1 Any questions or concerns about Wentworth Privacy Policy may be directed to either the Manager of Human Resources or the Chief Financial Officer or the Manager Treasury and

Compliance at Wentworth Resources Limited 3210, 715 - 5th Avenue SW, Calgary, Canada, T2P 2X6, telephone+1-403-294-1530.

DOCUMENT HISTORY

August 1, 2010	Approved by the Board of Directors of Artumas Group Inc.
January 14, 2014	Amended, approved and adopted by the Board of Directors of Wentworth Resources Limited
June 27, 2016	Amended, approved and adopted by the Board of Directors of Wentworth Resources Limited