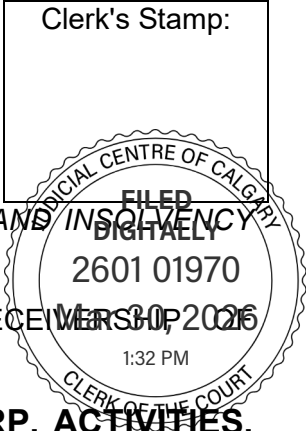


COURT FILE NUMBER 2601-01970  
COURT COURT OF KING'S BENCH OF ALBERTA  
JUDICIAL CENTRE CALGARY



IN THE MATTER OF THE *BANKRUPTCY AND INSOLVENCY*  
ACT, RSC 1985, c B-3, AS AMENDED  
AND IN THE MATTER OF THE RECEIVERSHIP  
HALO EXPLORATION LTD.

DOCUMENT **APPLICATION (APPROVAL OF KERP, ACTIVITIES,  
RESTRICTED COURT ACCESS)**

ADDRESS FOR SERVICE AND  
CONTACT INFORMATION OF  
PARTY FILING THIS DOCUMENT

**Burnet, Duckworth & Palmer LLP**  
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File No. 75459-4

**NOTICE TO RESPONDENT(S)**

This application is made against you. You are Respondents. You have the right to state your side of this matter before the Justice.

To do so, you must be in Court when the application is heard as shown below:

Date: April 7, 2026  
Time: 3:00PM  
Where: Calgary Courts Centre via Webex  
Before Whom: The Honourable Justice B.B. Johnston on the Commercial List

Go to the end of this document to see what else you can do and when you must do it.

**Remedy Claimed or Sought:**

1. FTI Consulting Canada Inc. ("**FTI**"), in its capacity as the Court-appointed receiver and manager (FTI in such capacity, the "**Receiver**") of Halo Exploration Ltd. ("**Halo**" or the "**Debtor**"), respectfully seeks an Order substantially in the form attached hereto as **Schedule "A"**:
  - (a) abridging the time for service of this Application and the supporting materials, as necessary, and deeming service thereof to be good and sufficient;
  - (b) approving the terms of a Key Employee Retention Plan (the "**KERP**") substantially in the form attached to the First Report of the Receiver dated March 30, 2026 (the "**First Report**");
  - (c) granting two charges in favour of the eligible participants under the KERP (the "**Eligible Participants**"):
    - (i) the Primary KERP Charge; and
    - (ii) the Secondary KERP Charge (each as defined below, and collectively, the "**KERP Charges**");
  - (d) approving the Receiver's activities, actions and conduct as further described in the First Report, including the receipts and disbursements described therein;
  - (e) pursuant to Rule 6.29, a Restricted Court Access Order sealing the Confidential Appendix to the First Report (the "**Confidential Appendix**") on the Court Record (a such relief being a "**Sealing Order**"); and
  - (f) such further and other relief as may be sought by the Receiver and this Honourable Court may deem appropriate.
2. Capitalized terms used herein but not defined herein have the meaning given to them in the First Report.

**Grounds for Making this Application:**

3. On February 10, 2026, upon the application of Invico Lending Strategies LP, by its General Partner, Invico Lending Strategies GP Inc. (collectively, "**Invico**"), Justice C.C.J. Feasby granted the following orders in the within proceedings (the "**Receivership Proceedings**"):
  - (a) an order (the "**Receivership Order**") appointing FTI as Receiver over all of Halo's assets, undertakings and properties (collectively, the "**Property**") pursuant to section 243(1) of the *Bankruptcy and Insolvency Act*, RSC 1985 c B-3 (the "**BIA**"), section 13(2) of the *Judicature Act*, RSA 2000, c J-2 and section 13(2) of the *Personal Property Security Act*, RSA 2000, c P-7; and
  - (b) an order (the "**SISP Order**") authorizing the Receiver to, among other things, implement a sales and investment solicitation process in respect of Halo and the Property (the "**SISP**").

***Key Employee Retention Plan and Associated Charges***

4. In consultation with Invico, the Receiver and certain former members of the Debtor's management team (defined in the KERP as the "**Key Employees**") have developed the KERP.
5. The high-level terms of the KERP are described in the First Report and an unredacted copy is attached the Confidential Appendix. The KERP provides an incentive for the Eligible Participants to assist the Receiver during the course of the Receivership Proceedings, specifically including but not limited to the implementation of the SISP and ensure that the Eligible Participants' interests are aligned with those of Halo's stakeholders.
6. The proposed KERP Charges shall secure the obligations under the KERP Payments on the following basis:
  - (a) the Primary KERP Charge in an amount not to exceed \$200,000 shall be in priority to all charges, other than the Receiver's Charge; and
  - (b) the Secondary KERP Charge secures amounts owing in respect of the Additional Success Fee shall rank subsequent to the perfected security of any existing secured creditors as at the Appointment Date (including Invico and Northbase).

7. FTI respectfully submits that the KERP and the KERP Charges are reasonable and appropriate in the circumstances and critical to the success of the Receiver's mandate.
8. The proposed ranking of the Charges are as follows:
  - (a) first, the Receiver's Charge, in an amount not to exceed \$200,000;
  - (b) second, the Primary KERP Charge, in an amount not to exceed \$200,000;
  - (c) third, the Receiver's Borrowing Charge, in an amount not to exceed \$500,000; and
  - (d) fourth, the Secondary KERP Charge which ranks subordinate to the perfected security interests of Halo's secured creditors that existed at the Appointment Date.

### ***Approval of Activities***

9. Since the Appointment Date, the Receiver has diligently administered Halo's estate.
10. Among other activities, the Receiver has:
  - (a) taken possession of the Property;
  - (b) undertaken certain administrative tasks in respect of Halo;
  - (c) published a timeline of key milestones set out in the SISP Procedure;
  - (d) prepared the Teaser Letter;
  - (e) gathered and reviewed all due diligence materials and established the VDR;
  - (f) negotiated NDAs with and facilitated access to the VDR for all interested parties;  
and
  - (g) communicated with Halo's stakeholders in respect of the Receivership Proceedings.

### ***Restricted Court Access***

11. The Confidential Appendix contains commercially sensitive information and personal information of the beneficiaries identified therein. The KERP reveals individually identifiable information, including, among other things, compensation information and

commercially sensitive information related to the SISP. Disclosure of such sensitive information may cause harm to the KERP beneficiaries. Disclosure of the commercially sensitive information may cause harm to the SISP and Halo's stakeholders. As a result, the protection of such information is an important commercial and privacy interest that should be protected.

12. The Receiver seeks to seal the Confidential Appendix until:
  - (a) ninety (90) days following the earlier of:
    - (i) the Receiver filing a Closing Certificate with the Court confirming the closing of a transaction contemplated by the SISP;
    - (ii) the Receiver filing a certificate confirming its discharge in these proceedings; or
  - (b) further order of the Court.
13. The Sealing Order sought is:
  - (a) the least restrictive and prejudicial alternative to prevent the dissemination of the information contained in the Confidential Appendix (the "**Confidential Information**") which could result in harm to Halo and its stakeholders; and
  - (b) fair and just in the circumstances to restrict public access to the Confidential Information.
14. Such further and other grounds as counsel may advise and this Honourable Court may permit.

**Material of Evidence to be Relied On:**

15. First Report of the Receiver, to be filed;
16. Bench Brief of Receiver, to be filed; and
17. Such further and other materials as counsel may advise and this Honourable Court may permit.

**Applicable Rules:**

18. The Alberta *Rules of Court*, AR 124/2010, as amended.
19. The *Bankruptcy and Insolvency General Rules* (CRC, c 368).

**Applicable Acts and Regulations:**

20. The *Bankruptcy and Insolvency Act*, RSC 1985, c B-3, as amended; and
21. Such further and other Acts and Regulations as counsel may advise and that this Honourable Court may permit.

**WARNING**

If you do not come to Court either in person or by your lawyer, the Court may give the applicant(s) what they want in your absence. You will be bound by any order that the Court makes. If you want to take part in this application, you or your lawyer must attend in Court on the date and at the time shown at the beginning of the form. If you intend to rely on an affidavit or other evidence when the application is heard or considered, you must reply by giving reasonable notice of the material to the applicant.

**Schedule "A"**

COURT FILE NUMBER 2601-01970

COURT COURT OF KING'S BENCH OF ALBERTA

JUDICIAL CENTRE CALGARY

Clerk's Stamp:

IN THE MATTER OF THE *BANKRUPTCY AND INSOLVENCY*  
ACT, RSC 1985, c B-3, AS AMENDED

AND IN THE MATTER OF THE RECEIVERSHIP OF  
HALO EXPLORATION LTD.

DOCUMENT **ORDER**

ADDRESS FOR SERVICE AND  
CONTACT INFORMATION OF  
PARTY FILING THIS DOCUMENT

**Burnet, Duckworth & Palmer LLP**

2400, 525 – 8<sup>th</sup> Avenue SW

Calgary, AB T2P 1G1

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jmackinnon@bdplaw.com

File No. 75459-4

**DATE ON WHICH THE ORDER WAS PRONOUNCED:** April 7, 2026

**NAME OF JUDGE WHO MADE THIS ORDER:** Justice B.B. Johnston

**LOCATION OF HEARING:** Calgary Courts Centre

**UPON** the application (the "**Application**") of FTI Consulting Canada Inc. in its capacity as the receiver and manager (the "**Receiver**") of the assets, undertakings and properties of Halo Exploration Ltd. (the "**Debtor**"); **AND UPON** having read the Orders of Justice C.C.J. Feasby dated February 10, 2026 whereby the Receiver was appointed over the assets, undertakings and property of the Debtor (the "**Receivership Order**"), and approving the sale and investment solicitation process (the "**SISP**") in respect of the Debtor (the "**SISP Order**"); **AND UPON** having read the First Report of the Receiver dated March 30, 2026 (the "**First Report**"), the Confidential Appendix to the First Report (the "**Confidential Appendix**") and such other materials in the pleadings and proceedings as deemed necessary; **AND UPON** having read the Affidavit of Service of Angelamor Molod Donor sworn [●], 2026; **AND UPON** hearing the submissions of counsel for the Receiver and any other interested parties appearing at the within application.

**IT IS HEREBY ORDERED AND DECLARED THAT:**

**Service**

1. Service of the Application for this Order is hereby validated and deemed good and sufficient, this application is properly returnable today, and no person other than those persons served is entitled to service of the Application.
2. Capitalized terms not otherwise defined herein have the meaning set forth in the First Report, the Receivership Order or the SISP Order, as applicable.

**Key Employee Retention Plan**

3. The key employee retention plan (the "**KERP**") as described in the First Report and which is attached thereto as the Confidential Appendix, pursuant to which the Receiver has agreed to provide compensation to certain key employees (the "**Key Employees**") of the Debtor, is hereby approved, and the Receiver is authorized to enter into such further agreements as may be necessary with each of the Key Employees in respect of the KERP.
4. The Key Employees are hereby granted the following charges over the Property as security for all amounts which may become payable to them under the terms of the KERP:
  - (a) first, a charge in the amount of \$200,000 (the "**Primary KERP Charge**"); and
  - (b) second, a charge for the balance of the amounts owing under the KERP (the "**Secondary KERP Charge**", and together with the Primary KERP Charge, the "**KERP Charges**", and together with the Receiver's Charge and the Receiver's Borrowing Charge, collectively, the "**Charges**").
5. Subject to the terms of this Order, the Primary KERP Charge shall rank in priority to all security interests, trusts, liens, charges and encumbrances, statutory or otherwise, in favour of any Person, but subordinate in priority to the Receiver's Charge and the charges set out in Sections 14.06(7), 81.4(4) and 81.6(2) of the BIA.
6. The Priorities of the Charges, as among them and secured creditors shall be as follows:
  - (a) first, the Receiver's Charge;
  - (b) second, the Primary KERP Charge;

- (c) third the Receiver's Borrowing Charge;
- (d) fourth, valid and enforceable claims of the Debtor's secured creditors with perfected security as at the date of the Receivership Order; and
- (e) fifth, the Secondary KERP Charge.

### **Approval of Receiver's Activities**

- 7. The actions, conduct, activities, disbursements and receipts of the Receiver, as set forth in the First Report, are hereby approved.

### **Restricted Court Access**

- 8. The Confidential Appendix shall be sealed on the Court file and shall not form part of the public record, notwithstanding Division 4, Part 6 of the Alberta *Rules of Court*.
- 9. The Confidential Appendix shall be sealed until:
  - (a) ninety (90) days following the earlier of:
    - (i) the Receiver filing a Closing Certificate with the Court confirming the closing of a transaction contemplated by the SISP;
    - (ii) the Receiver filing a certificate confirming its discharge in these proceedings; or
  - (b) further order of the Court.
- 10. If directed by this Court, the Clerk of this Honourable Court shall file the Confidential Appendix in a sealed envelope attached to a notice that sets out the style of cause of these proceedings and states that:

THIS ENVELOPE CONTAINS CONFIDENTIAL MATERIALS FILED BY FTI CONSULTING CANADA INC., IN ITS CAPACITY AS THE COURT-APPOINTED RECEIVER AND MANAGER OF HALO EXPLORATION LTD. THE CONFIDENTIAL MATERIALS ARE SEALED PURSUANT TO AN ORDER ISSUED BY JUSTICE B.B. JOHNSTON ON APRIL 7, 2026.

**Service**

11. Service of this Order may be effected by facsimile, electronic mail, personal delivery or courier and shall be deemed good and sufficient by:
  - (a) serving the same on:
    - (i) the service list created and maintained in these proceedings (the "**Service List**"); and
    - (ii) any other parties attending or represented at the Application for this Order; and
  - (b) posting a copy of this Order on the Receiver's website at:  
<https://cfcanada.fticonsulting.com/Halo/>.
12. Service on the Service List and any other party present at the Application is deemed to be effective immediately or, in the case of electronic mail effected as of the next business day following delivery of this Order.

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Justice of the Court of King's Bench of Alberta

## Angelamor Donor

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**From:** CommercialCoordinator KBJCalgary  
<CommercialCoordinator.KBJCalgary@albertacourts.ca>  
**Sent:** Tuesday, March 03, 2026 10:46 AM  
**To:** Ryan Algar; Angelamor Donor; David LeGeyt; Jessica MacKinnon; Robyn Gurofsky;  
Kaitlyn Wong  
**Cc:** Chelsea Arteau  
**Subject:** [EXT] WEBEX CONFIRMATION - 2601 01970 - INVICO LENDING STRATEGIES LP.; BY GP  
v. HALO EXPLORATION LTD. - Apr 07, 2026 03:00 PM - JOHNSTON, J - Confirmed  
**Attachments:** FTI-Halo - Booking Letter re 07Apr2026 Application before J. Johnston 03Mar2026.pdf

The above booking is Confirmed

File #(s) : 2601 01970

Style of Cause: INVICO LENDING STRATEGIES LP.; BY GP v. HALO EXPLORATION LTD.

Date/Duration:

Apr 07, 2026 03:00 PM

Total: 60 Minute(s)

Booking Type/List: Commercial

Purpose of Hearing: Commercial Hearing

Counsel: Ryan Edward Algar;

Special Requirements:

Requirements: Courtroom Required

Equipment: Video Conferencing

**Counsel: Please ensure that all relevant parties have received Webex information.**

**Virtual Courtroom 60** has been assigned for the above noted matter:

Virtual Courtroom Link:

<https://albertacourts.webex.com/meet/virtual.courtroom60>

Instructions for Connecting to the Meeting

1. Click on the link above or open up Chrome or Firefox and cut and paste it into your browser address bar.
2. If you do not have the Cisco Webex application already installed on your device, the site will have a button to install it. Follow installation instructions. Enter your full name and email address when prompted
3. Click on the **Open Cisco Webex Meeting**.
4. You will see a preview screen. Click on **Join Meeting**.

Key considerations for those attending:

1. Please connect to the courtroom **15 minutes prior** to the start of the hearing.
2. Please ensure that your microphone is muted and remains muted for the duration of the proceeding, unless you are speaking. Ensure that you state your name each time you speak.
3. If bandwidth becomes an issue, some participants may be asked to turn off their video and participate by audio only.
4. **Note: Recording or rebroadcasting of the video is prohibited.**
5. **Note: It is highly recommended you use headphones with a microphone or a headset when using Webex. This prevents feedback.**

For more information relating to Webex protocols and procedures, please visit: <https://www.albertacourts.ca/qb/court-operations-schedules/webex-remote-hearings-protocol>

You can also join the meeting via the "Cisco Webex Meetings" App on your smartphone/tablet or other smart device. You can download this via the App marketplace and join via the link provided above.

Thank you,

Karina



**Karina Schmitz**  
Court Coordinator