

Gradek Energy Inc. and Gradek Energy Canada Inc.

Action Plan (Restructuring) as of October 2014

<i>Action point</i>	<i>Responsibility</i>	<i>Timeline</i>	<i>Completed</i>	<i>Comments</i>
1. Retention of professionals				
(a) Engagement letter of McCarthy Tétrault (“McT”)	Gradek	October 9	√	
(b) Engagement letter of Deloitte (“Monitor”)	Gradek	October 9	√	
(c) Deposit for McT	Gradek	October 13	√	
(d) Deposit for Monitor	Gradek	October 13	√	
2. Communications				
(a) Develop core communications messages	Gradek / McT	October 10	√	
(b) Develop list of relevant persons to be called on the filing date (filed and non-filed entities)				
(i) customers <ul style="list-style-type: none"> ● Tervita ● New Alta ● Englobe 	Gradek	October 15		

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(ii) suppliers • Hatch	Gradek	October 15		
3. Initial Proceedings				
(a) Finalizing the Initial Court Application	McT	October 8	√	
(b) DIP				
(i) Obtained committed DIP Facility term sheet	Gradek	October 8	√	
(ii) Finalize DIP Facility Term Sheet Commitment	McT	October 10	√	
(c) Finalizing cash flow for post initial application	Gradek, Monitor	October 8	√	
(d) Providing lawyers with all financial statements, audited or unaudited	Gradek	October 8	√	
(e) Confirmation of Judge's availability	McT	October 10	√	
(f) Board meeting to approve resolution	McT	October 10	√	
(g) Notification to secured creditor				
(i) NBC	McT	October 14		

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(ii) IQ	McT	October 14		
(iii) Labrosse	McT	October 14		
(iv) Dundee	McT	October 14		
(v) Rev. Canada	McT	October 14		
(vi) Revenu Québec	McT	October 14		
(h) Presentation of the Initial Application seeking, amongst other, a charge to secure fees/cosh of all involved professionals a charge to secure DIP financing, and on extended stay of proceedings for the benefit of the whole Gradek Group	McT, Gradek, Monitor	October 15		
(i) Initial Order issued	McT	October 15		
(j) Activate web site	Deloitte	October 15		
(k) Monitor forward's copy to creditors of Initial Order;	Deloitte	October 15		

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4. Operations				
(a) Re-hired employees	Gradek	October 16		
(b) Collection of tax credit	Gradek	TBD		
(c) Obtaining confirmation from suppliers that no set-off post-filing				
(i) list of suppliers with address	Gradek	October 10		
(ii) letter to be sent / received by supplier	Gradek / McT	October 16		
5. Investments Process		TBD		
6. Motion for extension and the establishment of a claim's process	McT, Monitor	November 12		
7. Plan of Arrangement				