



Retaliation and Whistleblower Policy (also “Ethics and Compliance Reporting Policy”)

Policy Number: LEG-18-08-2022B
Effective Date: 18 August 2022
Date of Last Revision: 30 June 2026

1. INTRODUCTION AND PURPOSE

This Policy applies to all Boart Longyear and Veracio companies, including their subsidiaries and affiliates, regardless of location (collectively “Boart Longyear”, “Boart Longyear group” or the “Company”).

Boart Longyear is committed to fostering a culture of compliance, good corporate governance and ethical behavior and encourages the reporting of improper, unlawful or unethical behavior.

In accordance with Boart Longyear’s Code of Conduct, employees are required to report any concerns they have about ethics or compliance issues within Boart Longyear or with any vendors, suppliers, service providers, consultants or others doing business with Boart Longyear, for example:

- incorrect financial reporting;
- unlawful activity;
- activities contrary to Boart Longyear policies, including in particular the Boart Longyear Code of Conduct and Human Rights Policy; and
- any other activities which amount to improper conduct.

As stated in Boart Longyear’s Code of Conduct, Boart Longyear will not tolerate retaliation of any kind against someone who reports a concern honestly and in good faith. This Policy documents Boart Longyear’s commitment to maintaining an open working environment in which employees and others are able to report instances of unethical, unlawful or undesirable conduct without fear of intimidation, retribution or other Detriment.

The purpose of this Policy is to help detect and address Unacceptable conduct, provide employees and contractors with a supportive working environment in which they feel able to raise issues of legitimate concern, provide avenues for the Eligible whistleblower or discloser to report Unacceptable conduct and help protect those who have reasonable grounds to suspect misconduct and do report such Unacceptable conduct. This Policy also serves to comply with special protections granted to Eligible whistleblowers where conditions of an act, statute, law or other legal requirement (in any country where Boart Longyear operates) are met.

This Policy, in combination with the Australia Whistleblower Country Policy, the Poland Whistleblower Country Policy and the Germany Whistleblower Country Policy align with the requirements of the Australian Corporations Act, the EU Whistleblowing Directive (Directive 2019/1937/EU), the UK Public Interest Disclosure Act (PIDA), the Polish Whistleblower Protection Act, and the German Whistleblower Protection Act (HinSchG) respectively. This Policy also upholds the principles and obligations set forth in both the Peruvian Anticorruption Law (Ley N° 30424 and its amendments) and the Chilean Anticorruption Law (Ley N° 20.393 and related regulations).

Given Boart Longyear operates in multiple countries with differing legal, regulatory and governance regimes, what is required or appropriate can vary between jurisdictions. There may be

circumstances in which some of the requirements set out in this Policy are not required or appropriate to be applied in a particular jurisdiction, or where additional legal requirements apply, such as set out in the Australia Whistleblower Country Policy, the Poland Whistleblower Country Policy and the Germany Whistleblower Country Policy. For those parts of the Boart Longyear Group that are subject to laws or regulatory requirements that differ from this Policy, the more stringent standard applies.

2. DEFINITIONS

In this Policy:

Detriment includes (without limitation) dismissal of an employee, injury of an employee in his or her employment, alteration of an employee's position or duties to his or her disadvantage, discrimination (including between an employee and other employees of the same employer), harassment or intimidation of a person, harm or injury to a person including psychological harm, damage to a person's property, reputation, business or financial position, and any other damage to a person.

Eligible whistleblower or discloser means any of the following (i) a director, company secretary or employee, (ii) a person who supplies services or goods (whether paid or unpaid) or employee of such person, (iii) a relative of an individual in (i) or (ii); or a dependent or relative of an individual referred to in (i), (ii) or (iii); or any person as defined in section **Error! Reference source not found.** of the Australia Whistleblower Country Policy, section IV of the Poland Whistleblower Country Policy or Section 2 of the Germany Whistleblower Country Policy.

Protected disclosure means (i) a disclosure of information by an Eligible whistleblower or discloser where that person has reasonable grounds to suspect that the information concerns or indicates Unacceptable conduct and that disclosure is made in accordance with this Policy; or (ii) disclosures under the Australian, Polish and German Whistleblower regimes .

Unacceptable conduct means conduct which is unethical, unlawful or undesirable, including but not limited to conduct which:

- violates any company policy;
- is dishonest, fraudulent or corrupt;
- involves the giving or receiving of bribes;
- constitutes discrimination, harassment, bullying or intimidation;
- involves theft, drugs, violence, criminal damage to property or other breaches of state or federal law;
- is unethical, such as dishonestly altering company records or data, adopting questionable accounting practices or willfully breaching Boart Longyear's Code of Conduct;
- is potentially damaging to Boart Longyear such as unsafe work practices or substantial waste of company resources;
- may cause financial loss to Boart Longyear or damage its reputation or be otherwise detrimental to Boart Longyear's interests;
- involves any other kind of serious impropriety;

- involves any direct or indirect detrimental action against a Boart Longyear person as a result of the Boart Longyear person making a disclosure under this Policy; or
- is in breach of laws in any overseas jurisdiction in which Boart Longyear operates or any Australian law which applies to Australians while overseas.

3. HOW TO MAKE A PROTECTED DISCLOSURE

Boart Longyear has established various systems for the reporting of complaints and dealing with reports of Unacceptable conduct. For further information on Protected disclosures under the Australian, Polish or German Whistleblower regimes, please see the Australia Whistleblower Country Policy, the Poland Whistleblower Country Policy or the Germany Whistleblower Country Policy.

Note to Australian disclosers: although you may make a Protected disclosure in any manner as described in Policy below, only reports made in accordance with the Australia Whistleblower Country Policy (i.e. submitted via the Reporting Channels referred to in the referenced document) will be protected under the provisions of Australian law

Note to Polish disclosers: although you may make a Protected disclosure in any manner as described in Policy below, only reports made in accordance with the Poland Whistleblower Country Policy (i.e. submitted via the Reporting Channels referred to in the referenced document) will be protected under the provisions of Polish law.

Note to German disclosers: although you may make a Protected disclosure in any manner as described in the Policy below, only reports made in accordance with the Germany Whistleblower Country Policy (i.e. submitted via the Reporting Channels referenced document) will be protected under the provisions of German law.

3.1 You may make a report internally

As an employee of Boart Longyear, you are able to make a report to your supervisor (which includes officers, vice-presidents, directors, managers and office or field supervisors), Human Resources representative or the Legal Department.

3.2 You may make a report to an independent third-party

A confidential report can be made to the Company Compliance Helpline by telephone or over the internet 24 hours a day, 7 days a week.

The information is collected by an independent third-party company chosen by Boart Longyear to provide employees with a confidential and, if desired, anonymous method to report their workplace concerns.

Reports can easily be made over the internet at <https://bly.integrityline.com/>. The internet reporting landing site is available in multiple languages. A report can also be made by telephone and translation assistance is available. The dialing instructions and local phone numbers are listed on the internet site. Please refer to the site for the most current telephone number information. If there is no access to the internet, the dial-in numbers for each region are listed below. Please note there may not be a telephone number specific to every location. If there is not, the collect call (reverse charges) number is provided below.

Information about the reporting line can also be found on the internal Boart Longyear [Underground](#) Sharepoint site, the external Boart Longyear website and on posters in each Boart Longyear location.

Internet Reporting	https://bly.integrityline.com/ or 
Country	Phone Number
Argentina	0800 333 0095
Australia	1 800 763 983
Canada	1.800.235.6302
Chile	800 914 012
Germany	(0) 800 181 2396 Note: depending on phone carrier, caller may not need to dial the initial 0
Indonesia	Local (+62) 21-50851420 Toll free: 0800 1503216
Mexico	800 681 6945
Peru	800-78323
Poland	IFTS (Mobile callers may be charged): 00.800.141.0213 Toll free: 800 005 266
South Africa	080 098 3612 OR +27 105004106
Sweden	020 889 823
Switzerland	0800.838.835
Tanzania	0800.780.005 Note: only accessible from Airtel Network fixed and mobile phones
United States	1.800.461.9330
For the most up to date information or locations not listed above, please review the information on www.bly.integrityline.com	

3.3 You may make a report to outside counsel

You can raise your concern to the Audit and Risk Committee of the Board of Directors by making a report to outside counsel either by email or by phone:

Jonathan Drimmer
Steptoe LLP
Email: jdrimmer@steptoe.com
Phone: +1 (202) 429-3000

Your report can be made anonymously or by disclosing your identity.

3.4 You may make your report anonymously

A person may make a disclosure anonymously by advising that they wish to remain anonymous. A person can also place restrictions on who can know their identity, for example, by limiting anonymity to everyone except the investigating team to enable the investigating team to contact the reporting person for additional details and information if necessary. A person may also choose to relinquish their anonymity at any time. Where the employee making a report chooses not to remain anonymous, or becomes known in the course of investigation of the report, Boart Longyear will make every reasonable effort to protect the confidentiality of that employee. This includes removing identifying personal information from written materials and limiting knowledge of their identity to those directly involved in handling and investigating the report.

If you have chosen to remain anonymous but are willing to disclose your identity to assist with an investigation, your identity will only be disclosed where it is reasonably necessary to investigate the matter, comply with the law, or obtain legal advice. Boart Longyear will take all reasonable steps to ensure your identity is protected from unnecessary disclosure.

If you make a report to the Compliance Helpline anonymously, you should periodically check back into the system to receive communications regarding your report. If the investigation team has questions or needs additional information to assist with the investigation, the only way for them to communicate with you is through the system.

3.5 What happens if the allegations I raised prove to be incorrect?

Any report or concern made, based on reasonable suspicions, is fully protected by this Policy, even if the issues raised are not substantiated after investigation.

The making of any intentionally false or malicious report, or a report made for improper reasons will be regarded as misconduct and may result in disciplinary action up to and including termination.

Where investigations or other enquiries do not substantiate a Protected disclosure, the fact the investigation has been carried out, the results of the investigation, and the identity of any person subject of the disclosure will remain confidential.

3.6 What happens if a report is made against me?

Subject to compliance with any legal requirements, an employee who is the subject of a Protected disclosure has the right to:

- be informed as to the substance of the allegations;
- be given a reasonable opportunity to put their case (either orally or in writing) to the investigating team; and
- be informed of the findings in respect of the Protected disclosure

4. NO RETALIATION FOR REPORT BASED ON REASONABLE SUSPICIONS

No director, officer, or employee who reasonably suspects and reports an ethics or compliance issue will be harassed, victimized or suffer any adverse employment consequences.

Anyone who causes Detriment or threatens to cause Detriment to a person because they believe or suspect that the person has made, proposes to make, or could make a Protected disclosure under this Policy is subject to disciplinary action, up to and including termination of employment.

If a person causes you any Detriment or threatens to cause you Detriment because that person believes or suspects that you have made, propose to make or could make a Protected disclosure

under this Policy, you must immediately either inform your supervisor or bring it to the attention of the Legal Department.

All employees must abstain from any activity that is or could be perceived to be victimization or harassment of persons who make disclosures under this Policy.

4.1 Legal Protections

Boart Longyear will comply with all applicable local laws that provide protections for individuals who report concerns in good faith.

For further information about Australian, Polish and German laws in relation to whistleblower protections, please read the Australia Whistleblower Country Policy, the Poland Whistleblower Country Policy and the Germany Whistleblower Country Policy.

5. HOW ARE REPORTS HANDLED ONCE RECEIVED?

All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Although it will depend on the particular circumstances, reports are normally handled as follows:

- If contact information has been provided, the discloser making the report will be informed by the lead investigator or the compliance manager or equivalent role that the report has been received and is being investigated.
- If the discloser elects to remain anonymous by using the Compliance Helpline and further information is required in order to progress the investigation, correspondence will be sent via the reporting system. The website allows Boart Longyear to send written notes to the discloser without the need for the discloser to divulge their identity. It is important that the discloser check back with the website regularly while the investigation remains open so as to respond to any questions regarding the report.
- The investigating team will often involve members of Human Resources, Legal and/or Compliance of the relevant Business Unit.
- Once all the required information has been gathered, a report is prepared by the investigation team as to whether the allegations made are substantiated and if so, what appropriate disciplinary or remedial action is recommended. All information relating to a Protected disclosure and its investigation will be retained under strict security and confidentiality; any unauthorized release will be a breach of this Policy.
- If the allegations are substantiated, Boart Longyear's normal disciplinary procedures will be followed, which includes giving the person who is the subject of the report an opportunity to respond. If requested, the anonymity of the person making the report will continue to be protected through this process as described above.
- If contact information has been provided or if the Protected disclosure was made through the Compliance Helpline, the Reporter will be notified by the lead investigator or compliance manager, respectively, upon completion of the investigation and advised that proper actions have been taken based on the results of the investigation. However, specific details and conclusions from the investigation may or may not be shared.
- For details about handling reports under Australian laws, please read section 7 of the Australia Whistleblower Country Policy.

- For details about handling reports under Polish laws, please read section VI of the Poland Whistleblower Country Policy.
- For details about handling reports under German laws, please read section 6 of the Germany Whistleblower Country Policy

6. REVISION HISTORY

APPROVED by	Board of Directors of Boart Longyear Group Ltd. on August 18, 2022	
OWNED by	Chief Legal Officer	Giovanna Bee Moscoso
ADMINISTRATED by	Compliance Manager	Amy Cottle-
	ESG Manager	Claudia Valdivia
Reviewers (Original document)	Assistant General Counsel	Shannon Emrick
	Company Secretary & Global Corporate and Governance Counsel	Nick Nash
	Compliance Manager	Amy Cottle
	Interim Chief Human Resources Officer	Donatien Pichot
	Global Director Audit & Risk Services	Ty Barnes
** Note: This policy replaces Policy LEG-0001-07-19 as of the approval date listed above		
As of Revision 002: OWNED by	General Counsel or Chief Financial Officer of each Business Unit	Nick Nask, General Counsel, Drilling Products Brian Durrant, Chief Financial Officer, Veracio Rachida Boujarda, EMEA Legal Director, Drilling Services
ADMINISTRATED by	Compliance and ESG Managers of each Business Unit (or equivalent roles)	Amy Cottle and Claudia Valdivia – Drilling Products Ty Barnes and Steven Galjaardt – Drilling Services Amy Shaba - Veracio
REVISIONS:		
Revision 0001	February 28, 2025	General updates including updated phone numbers, updated contact information for outside counsel and references to the Compliance helpline rather than to “Convercent” specifically.
	Reviewers	Giovanna Bee Moscoso Amy Cottle
Revision 0002	December 19, 2025	Updated to ensure compliance with the Australian <i>Corporations Act 2001</i> (Cth), Polish Whistleblower Protection Act of 24 June 2024 (Journal of Laws of 2024, item 928), German Whistleblower Protection Act (Hinweisgeberschutzgesetz, HinSchG), EU Whistleblowing

		Directive (Directive 2019/1937/EU), the UK Public Interest Disclosure Act (PIDA), Peruvian Anticorruption Law (Ley N° 30424 and its amendments) and the Chilean Anticorruption Law (Ley N° 20.393 and related regulations). Update the owner and administrator, as per segmentation of the business.
	Reviewers	Giovanna Bee Moscoso Amy Cottle Rachida Boujarda Claudia Valdivia Nick Nash Brian Durrant Ty Barnes
RELATED GOVERNANCE DOCUMENTS:		
Australia Whistleblower Country Policy		
Poland Whistleblower Country Policy		
Germany Whistleblower Country Policy		
Revision 0003	30 June 2026	Updated web address and phone numbers in section 3