Australia Whistleblower Country Policy

Policy Number: LEG-18-08-2022 AU
Effective Date: 19 December 2025
Date of Last Revision: 30 June 2026

1. SCOPE

This country Policy is prepared in order to provide additional guidance in relation to Australian regulations and legal protections for Whistleblowers. This Policy is adopted by and applies to all Australian Boart Longyear entities and Boart Longyear Companies with operations and business in Australia, including Veracio Australia Pty Ltd and Minalyze Pty Ltd (collectively "Boart Longyear Australia").

In Australia, the *Corporations Act 2001* (Cth) (Corporations Act) and the *Taxation Administration Act 1953* (Cth) (Tax Administration Act) provide for protection of whistleblowers (Australian Whistleblower Regime).

This Policy will be made available to employees and officers of Boart Longyear Australia. This Policy can be found on the internal Boart Longyear Underground Sharepoint site and the external Boart Longyear website.

2. WHO DOES THIS AUSTRALIAN WHISTLEBLOWER POLICY APPLY TO?

This Australian Whistleblower Policy applies to you if you meet the criteria to be an "eligible whistleblower" (see, section 3.1 below).

If you are unsure whether this Australian Whistleblower Policy applies to you, you are welcome to contact the Legal Department to discuss.

1. CAN I MAKE A PROTECTED DISCLOSURE?

Disclosures made on or after 1 July 2019 in accordance with the requirements of the Australian Whistleblower Regime are called "protected disclosures".

You can make a "protected disclosure" under the Australian Whistleblower Regime if:

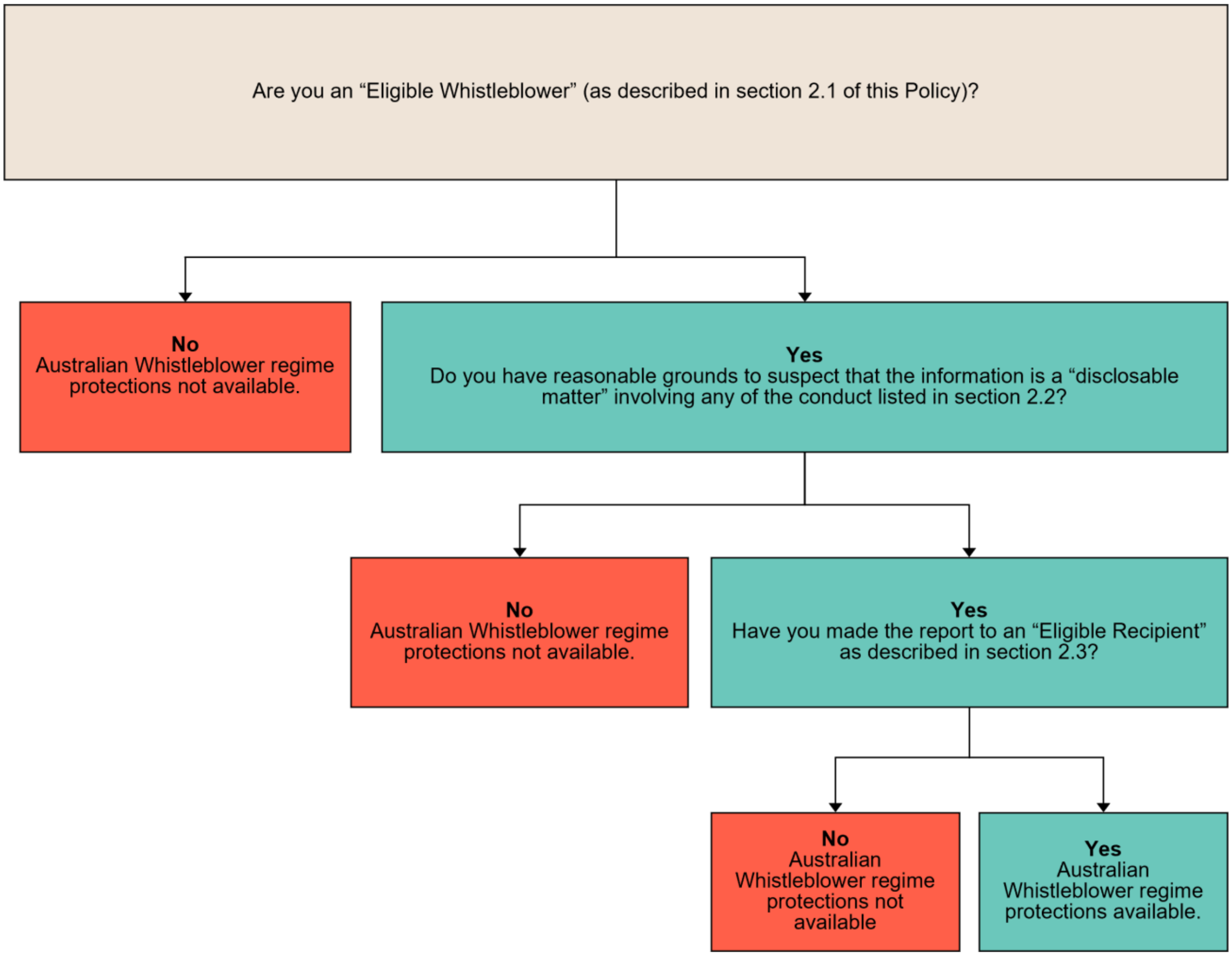
(a) you are an "eligible whistleblower" (see, section 1.1); and

(b) the disclosure you make is about a disclosable matter (see, section 1.2); and

(c) you make the disclosure directly to a person who is eligible to receive a protected disclosure (see, section 1.3).

If you make a disclosure that meets all of these requirements, you will qualify for protection under the Australian Whistleblower Regime. This is the case even if your disclosure later turns out to be incorrect.

The following diagram shows the criteria that must be satisfied for a disclosure to be a "protected disclosure" under the Australian Whistleblower Regime:



1.1 You must be an "eligible whistleblower"

You are an "eligible whistleblower" in relation to Boart Longyear Australia if you are, or have previously been:

(a) an **officer** of Boart Longyear Australia;

(b) an **employee** of Boart Longyear Australia;

(c) a person who **supplies goods or services** to Boart Longyear Australia, and employees of those suppliers, including volunteers of Boart Longyear Australia;

(d) a director or company secretary of Boart Longyear Australia or a related body corporate of Boart Longyear Australia (see, further below in section 1.2 as to what is a "related body corporate" and as to what matters are "disclosable matters" under the Australian Whistleblower Regime[1]);

(e) either:

(i) in relation to the Corporations Act, a relative, dependant, or spouse of a dependant of any of the above individuals; or

(ii) in relation to the Tax Administration Act, a spouse, child, dependant, or spouse of a dependent of any of the above individuals.

1.2 You must make a disclosure about a "disclosable matter"

Only disclosures of certain types of information will qualify for protection under the Australian whistleblower laws and this Policy.

What is a "disclosable matter" under the Corporations Act?

Information is a "disclosable matter" under the Corporations Act if the eligible whistleblower has reasonable grounds to suspect that the information disclosed:

(a) concerns misconduct or an improper state of affairs or circumstances in relation to Boart Longyear Australia or any related body corporate of Boart Longyear Australia. A related body corporate is any subsidiary of Boart Longyear Australia, holding company of Boart Longyear Australia or any other subsidiary of that holding company (together, with Boart Longyear Australia, the Boart Longyear Group). Misconduct includes fraud, negligence, default, breach of trust and breach of duty. Conduct does not necessarily need to be "unlawful" to fall within the scope of "misconduct or an improper state of affairs or circumstances", and may include (as applicable to the Boart Longyear Group):

(i) systemic improper conduct within any entity in the Boart Longyear Group that is causing, or may cause, harm;

(ii) conduct that indicates a significant risk to public safety or the financial system;

(iii) conduct that is not in the interests of the public; and

(iv) unsafe work practices and other significant safety concerns; or

(v) conduct that indicates that an entity in the Boart Longyear Group or any employee, volunteer or officer of such an entity has engaged in conduct that:

(A) constitutes a contravention of specific legislation, including the Corporations Act, and the *Australian Securities and Investments Commission Act 2001* (Cth); or

[1] For example, conduct that indicates that an entity in the Boart Longyear Group or any employee, volunteer or officer of such an entity has engaged in conduct constitutes an offence against any law of the Commonwealth that is punishable by at least 12 months' imprisonment. Under Australian law, this will generally occur only if the conduct constituting the offence occurs wholly or partly in Australia or a result of the conduct occurs wholly or partly in Australia.

(B) constitutes an offence against any other law of the Commonwealth that is punishable by at least 12 months' imprisonment; or

(C) represents a danger to the public or the financial system.

An example of where you will unlikely have "reasonable grounds" to suspect alleged wrongdoing is where you make a deliberately false report.

Under Australian law, an offence against Commonwealth law will generally occur only if the conduct constituting the offence occurs wholly or partly in Australia or a result of the conduct occurs wholly or partly in Australia.

What types of matters do not qualify for legal protection under the Corporations Act and this Policy?

Except in certain circumstances, a personal work-related grievance (for example a disclosure about an interpersonal conflict or a disciplinary decision) will not be protected under the Australian Whistleblower Regime or this Policy.

A personal work-related grievance **will** be protected if:

(a) the grievance also concerns allegations of victimisation (see, section 3.3 below); or

(b) the grievance:

(i) constitutes a contravention of specific legislation, including the Corporations Act, and the *Australian Securities and Investments Commission Act 2001* (Cth);

(ii) constitutes an offence against any other law of the Commonwealth that is punishable by at least 12 months' imprisonment; or

(iii) represents a danger to the public or the financial system; or

(c) the grievance also has significant implications for Boart Longyear Australia (or another regulated entity) that do not relate to the eligible whistleblower; or

(d) the disclosure is made to a legal practitioner in order to obtain legal advice or legal representation in relation to the Australian Whistleblower Regime.

What is a "disclosable matter" under the Tax Administration Act?

Information is a "disclosable matter" under the Tax Administration Act if:

(a) the grievance also concerns allegations of victimisation; or

(b) the eligible whistleblower has reasonable grounds to suspect that the information concerns misconduct or an improper state of affairs or circumstances in relation to the tax affairs of Boart Longyear Australia or an associate of Boart Longyear Australia; and

(c) the eligible whistleblower considers that the information may assist the eligible recipient to perform their functions or duties in relation to the tax affairs of Boart Longyear Australia or an associate of Boart Longyear Australia.

1.3 You must make the disclosure directly to someone authorised to receive a protected disclosure

Reporting within Boart Longyear Australia

As stated in section 3 of the Company Retaliation and Whistleblower Policy, Boart Longyear has established various channels for the reporting of complaints and dealing with reports of unacceptable conduct. The table below includes the reporting channels established in such global Policy, who would also be considered an "eligible recipient" authorised to receive protected disclosures in relation to Boart Longyear Australia for the purposes of the Australian Whistleblower Regime:

Corporations Act disclosures and tax-related disclosures
• To the extent that it exists, the Audit and Risk Committee of the Board of Directors of Boart Longyear; • any supervisor of Boart Longyear, as defined in the Code of Conduct and Retaliation and Whistleblower Policy, including officers, vice-presidents, directors, managers and office or field supervisors; • an auditor or risk manager, or a member of an audit team conducting an audit, of Boart Longyear (including of Boart Longyear Australia or a related body corporate); • any member of Human Resources or the Legal Department who are authorised by Boart Longyear in the Code of Conduct and Retaliation and Whistleblower Policy to receive disclosures that may qualify for protection under the Australian Whistleblower Regime.

Under the Australian Whistleblower Regime, each of the following additional individuals (as and if applicable) are also "eligible recipients" in relation to Boart Longyear Australia:

Corporations Act disclosures	Tax-related disclosures
• an officer of Boart Longyear Australia or a related body corporate, including a director or company secretary; • an actuary of Boart Longyear Australia or a related body corporate.	• an officer of Boart Longyear Australia or a related body corporate, including a director or company secretary; • any other employee or officer of Boart Longyear Australia who has functions or duties that relate to the tax affairs of Boart Longyear Australia; • a registered tax agent or BAS agent who provides tax agent services or BAS services to Boart Longyear Australia or a related body corporate.

Reporting outside of Boart Longyear

Boart Longyear Australia takes all protected disclosures seriously and will not tolerate any behaviour which constitutes misconduct or an improper state of affairs or circumstances in relation to Boart Longyear Australia or the Boart Longyear Group. Boart Longyear Australia accordingly encourages its employees and others to raise their concerns directly with an eligible recipient of

Boart Longyear Australia as outlined above. This will enable Boart Longyear Australia to address any wrongdoing as early as possible.

An employee or other person can also contact an eligible recipient of Boart Longyear Australia (outlined above) to obtain additional information before making a disclosure.

An eligible whistleblower may also make a protected disclosure to:

(a) the Australian Securities and Investments Commission (**ASIC**), the Australian Prudential Regulation Authority (**APRA**) or a prescribed Commonwealth authority. ASIC and APRA have issued information sheets or guides on whistleblowers' rights and protections, which are available here and here;

(b) a legal practitioner in order to obtain legal advice or legal representation in relation to the Whistleblower Regime;

(c) in limited circumstances, a journalist or member of a Commonwealth, state or territory Parliament. This would need to meet the strict criteria set out under the Corporations Act. It is important that you understand the criteria for making a protected disclosure to a journalist or member of Parliament before doing so. We recommend that you contact an independent legal adviser if you wish to obtain further information regarding the strict criteria for making a protected disclosure to a journalist or member of Parliament.

If the protected disclosure relates to the tax affairs of Boart Longyear Australia, then an eligible whistleblower may make a protected disclosure to:

(a) a legal practitioner in order to obtain legal advice or legal representation in relation to the Australian Whistleblower Regime;

(b) a medical practitioner or psychologist, for the purpose of obtaining assistance in relation to the disclosure;

(c) in certain circumstances, the Commissioner of Taxation or the Tax Practitioners Board. The ATO has issued a guide on tax whistleblowing, which is available here.

2. HOW MAY DISCLOSURES BE MADE?

As outlined in Section 3 of the Retaliation and Whistleblower Policy and the Code of Conduct, an employee of Boart Longyear (including Boart Longyear Australia) is able to make a disclosure to their supervisor (which includes officers, vice-presidents, directors, managers and office or field supervisors), a Human Resources representative or a member of the Legal Department.

A confidential disclosure can also be made by any person by telephone or over the internet 24 hours a day, 7 days a week at www.bly.integrityline.com. The information is collected by an independent third-party company chosen by Boart Longyear to provide a confidential and, if desired, anonymous method to report workplace concerns.

The internet reporting landing site is available in multiple languages. A disclosure 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.

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.

You can also make a disclosure to the Audit and Risk Committee of the Board of Directors by making a report to outside counsel either by email or by phone using the following information:

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

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

There is no requirement for disclosures to be made in a particular form. Disclosures may be made in writing (eg via email), in person or via telephone. You may choose to remain anonymous during and after any investigation into the protected disclosure. For example, if Boart Longyear Australia receives a disclosure from an email address from which the sender's identity cannot be determined and the discloser does not identify themselves in the email, it will be treated as an anonymous disclosure. You may take steps to make the disclosure securely and outside of business hours if you wish. You can contact an eligible recipient of Boart Longyear Australia (outlined above) to arrange this.

If you choose to make an anonymous disclosure, we recommend that you maintain ongoing two-way communication so that Boart Longyear Australia can ask any follow up questions. We want all whistleblowers to feel comfortable raising their concerns openly as anonymous disclosures may not be dealt with as effectively as direct reports to an eligible recipient within Boart Longyear Australia. Boart Longyear Australia also confirms that all whistleblowers who disclose their identity while making a protected disclosure will be afforded confidentiality protections in respect to their identity under the Corporations Act and as outlined in the next Part of this policy.

3. WHAT PROTECTIONS ARE AVAILABLE IF I MAKE A PROTECTED DISCLOSURE?

If you have made a protected disclosure under the Australian Whistleblower Regime, either directly to Boart Longyear Australia or to another person authorised to receive protected disclosures, the following legal protections will apply to you.

3.1 Confidentiality regarding your identity

The Australian Whistleblower Regime sets strict confidentiality obligations regarding your identity information if you make a protected disclosure.

It is unlawful for Boart Longyear Australia to disclose the identity or information that may lead to the identification of a whistleblower (**Confidential Identity Information**) unless Boart Longyear Australia is authorised to do so under the Australian Whistleblower Regime.

There are limited circumstances in which Boart Longyear Australia is authorised to disclose Confidential Identity Information, including:

(a) if the disclosure is made with the whistleblower's consent;

(b) if the disclosures is made to a legal practitioner for the purposes of obtaining legal advice or legal representation in relation to the Whistleblower Regime under the Corporations Act; or

(c) the disclosure is made to ASIC, APRA, a member of the Australian Federal Police (**AFP**) or another body prescribed by the Corporations Regulations.

If you do disclose your identity when making a protected disclosure, the person who receives your disclosure will treat your identity confidentially in accordance with the above confidentiality protections. This includes securely storing documents regarding your protected disclosure, and limiting access to information relating to the protected disclosure to those directly involved in managing and investigating the disclosure.

In some circumstances, it may be necessary for Boart Longyear Australia to request your consent to disclose your identity in order to effectively progress with dealing with your protected disclosure. You are under no obligation to provide your consent, but we encourage you do so as it will enable us to fully investigate a protected disclosure and take appropriate action.

If you do not consent to the disclosure of your identity, the matter may nevertheless be referred for investigation, but the investigator will be required to take all reasonable steps to reduce the risk of you being identified as a result of the investigation.

3.2 Protection from civil, criminal or administrative action

Eligible whistleblowers who make a protected disclosure under the Australian Whistleblower Regime are protected from certain legal action or other action taken by Boart Longyear Australia or any individuals for making the disclosure, including:

(a) civil, criminal, and administrative liability (including disciplinary action) against the whistleblower; and

(b) contractual action, including termination of a contract on the basis that making a disclosure is a breach of that contract.

However, these protections do not grant a whistleblower immunity for any of the misconduct by the whistleblower that is revealed in their disclosure.

3.3 Prohibition against victimisation

It is unlawful for a person to:

(a) engage in any conduct that causes any detriment; or

(b) make a threat to cause any detriment,

to a whistleblower or another person because the person engaging in the conduct believes or suspects that the other person or a third person made, may have made, proposes to make, or could make, a protected disclosure.

"Detriment" is defined in part **Error! Reference source not found.** of the Policy and includes dismissal, disciplinary action, harassment, discrimination, property damage, reputational damage and other types of damage to a person.

Penalties apply for engaging in any of the conduct referred to above. Any person involved in the contravention may be found liable.

If a person suffers, or is threatened, detriment in contravention of the Australian Whistleblower Regime, the person may apply to the court for an order of compensation or another remedy against those who were involved in the contravention.

3.4 Compensation and remedies

Penalties apply for engaging in any of the conduct referred to above. Any person involved in the contravention may be found liable.

If a person suffers, or is threatened, detriment in contravention of the Australian Whistleblower Regime, the person may apply to the court for an order of compensation or another remedy against those who were involved in the contravention.

4. WHAT IF I MAKE A DISCLOSURE THAT DOES NOT QUALIFY FOR PROTECTION UNDER THE WHISTLEBLOWER REGIME?

If you do not meet the requirements set out in Part 1, then you will not qualify for the legal protections under the Corporations Act or the Tax Administration Act, or this Policy for disclosures in relation to Boart Longyear Australia.

However, your disclosure may be protected under other legislation. For example, your disclosure may amount to the exercise of a workplace right. Under the *Fair Work Act 2009* (Cth), Boart Longyear Australia and Australian Boart Longyear entities are prohibited from taking adverse action against employees or contractors because they exercised or propose to exercise any workplace rights.

5. HOW BOART LONGYEAR AUSTRALIA WILL HANDLE AND INVESTIGATE DISCLOSURES

Boart Longyear Australia takes all protected disclosures seriously and, where appropriate, will investigate protected disclosures that are reported to an eligible recipient within Boart Longyear Australia. All investigations into protected disclosures will be conducted fairly, without any bias or prejudice against either the whistleblower or any other person allegedly involved in the matter.

Boart Longyear Australia will need to make preliminary enquiries to:

(a) assess whether the disclosure falls within the scope of the Australian Whistleblower Regime; and

(b) determine how best to progress the issues raised in the disclosure, including whether or not a full investigation will be necessary and possible.

If an investigation is necessary and possible then, depending on the nature of the disclosable matter, a protected disclosure will be either:

(a) investigated internally by a member of management, a member of Human Resources, a member of the Legal team, a member of Internal Audit, or outside legal counsel as appropriate based on the specific allegations raised in the disclosure; or

(b) referred to the appropriate external person for investigation.

The referral of a protected disclosure for investigation will be done in accordance with the confidentiality obligations that Boart Longyear Australia owes to the eligible whistleblower. If compliance with Boart Longyear Australia's confidentiality obligations will prevent it from conducting a fair investigation, Boart Longyear Australia will discuss this with the whistleblower before progressing the matter.

Boart Longyear Australia will document and report the findings of an investigation in accordance with its confidentiality obligations, including limiting access to information relating to the protected disclosure and the investigation to those directly involved in investigating the disclosure. The manner in which it documents and reports those findings will depend on the nature of the disclosure.

It is important to understand that Boart Longyear Australia may not be able to commence or progress with an investigation into a protected disclosure in some circumstances, for example because:

(a) the whistleblower made the disclosure anonymously and did not provide any contact details for Boart Longyear Australia to obtain further information from the whistleblower;

(b) Boart Longyear Australia is unable to proceed with the investigation without disclosing the whistleblower's identity, but the whistleblower does not provide consent to such disclosure.

Boart Longyear Australia will aim to keep the whistleblower regularly informed of the progress of the investigation and its expected timeframe. However, confidentiality concerns, if any, may prevent Boart Longyear Australia from providing specific details of the investigation or any disciplinary action taken as a result. All staff should treat any information about the investigation as confidential.

6. SUPPORT FOR WHISTLEBLOWERS

Boart Longyear Australia is committed to ensuring all personnel feel supported and able to raise issues which relate to any misconduct or improper state of affairs or circumstances within Boart Longyear Australia or the Boart Longyear Group.

Where a protected disclosure is made, Boart Longyear Australia will reiterate the requirements of this Policy and the Australian Whistleblower Regime with any person concerned in the investigation of the disclosure.

As stated in Part 7, Boart Longyear Australia will conduct investigations into protected disclosures in a manner which is fair and will have regard to the protections afforded to the whistleblower and the privacy and fair treatment of persons referred to in the disclosure, including those to whom the disclosure relates.

Boart Longyear Australia will determine whether any disciplinary outcomes or other remedies are appropriate after an investigation into a protected disclosure is completed.

7. FAIR TREATMENT

As per section 4 of the Retaliation and Whistleblower Policy and consistent with the provisions of this Australian Policy, Boart Longyear Australia will not tolerate any reprisals or threats of reprisals made against whistleblowers and will take appropriate steps to protect whistleblowers from such retaliation.

It is important that all investigations into protected disclosures are conducted in a procedurally fair and confidential manner, to ensure the fair treatment of any individuals named in the protected disclosure or to whom the protected disclosure relates.

No action will be taken against any individual implicated in a protected disclosure until an investigation has determined whether any allegations against them are substantiated. However, if appropriate, an implicated employee or officer may be temporarily stood down on full pay pending the outcome of the investigation.

8. OTHER INFORMATION

If you would like further information about how this Policy works and what it covers, please contact the Chief Legal Officer of Boart Longyear or the Chief Legal Officer of the relevant Business Unit, who will treat your discussions confidentially.

Boart Longyear Australia will review this Policy periodically as required and may amend it from time to time.

9. ADMINISTRATION AND REVISION HISTORY

APPROVED by	Chief Legal Officer on November 21, 2025	
OWNED by	General Counsel, Chief Legal Officer or Chief Financial Officer of each Business Unit	Nick Nask, General Counsel, Drilling Products Brian Durrant, Chief Financial Officer, Veracio Rachida Boujarda, interim General Counsel, Drilling Services
ADMINISTRATED by	Compliance and ESG Manager of each Business Unit (or equivalent roles)	Amy Cottle and Claudia Valdivia – DP Ty Barnes and Steven Galjaardt – DS Amy Shaba - Veracio
REVIEWED by	Chief Legal Officer	Giovanna Bee Moscoso
	General Counsel, Drilling Products	Nick Nash
	Compliance Manager, Drilling Products	Amy Cottle - DP
		Ty Barnes - DS
		Brian Durrant - Veracio
	External Australian Legal Counsel	Ashurst
REVISIONS:		
Revision 0001	30 June 2026	Updated website address in section 4