

## QUALITY, HEALTH, SAFETY AND ENVIRONMENT POLICY

Inco-Drilling's present and future business success depends on the satisfaction of our customers while protecting people and the environment. We focus on the quality of our services, the human safety of our personnel, our clients and our contractors; the protection of the environment and the social well-being where we work.

Whereas the management of Inco-Drilling is responsible for the communication, implementation and compliance to this policy, Inco-Drilling demands the engagement and accountability of all its employees and contractors to this policy. We are committed to:

- Protect the safety, health and security of our people at all times
- Report any non-conformances, hazards, risks and incidents
- Work together to mitigate risks to a minimum and acceptable level
- Eliminate quality non-conformances and HSE accidents
- Meet customer's requirements and exceed their expectations
- Minimize our environmental impact
- Set QHSE performance objectives, measure results and re-asses to improve
- Promote Stop-Work authority
- Communicate this policy with our clients, contractors and the societies where we work

We shall abide the laws where we operate and fulfil this policy at all times,



Diana M. Tronco  
Managing Director

## JOURNEY MANAGEMENT POLICY

For Inco-Drilling, driving is the activity that represent the greatest risk for accidents of our personnel. In order to minimize this risk and comply with legal driving standards and practices, any person driving on behalf of Inco-Drilling must:

- Comply and abide to the journey management standard which addresses driving conditions and their related risks.
- Do not drive under the influence of alcohol or any drugs or narcotics
- Wear seat belts at all times when driving a vehicle and ensure that others wear their seat belt if other passengers are in the vehicle.

Any violation of this Policy by any Inco-Drilling's employee, consultant, agent and any person acting on behalf of the Company may result in civil or criminal prosecution of the Company and the persons involved. Internally, any violation may result in disciplinary action including immediate termination.



Diana M. Tronco  
Managing Director

## ANTICORRUPTION POLICY

Inco-Drilling competes fairly in all the countries in which it operates, based in outstanding service quality, cost efficient solutions, competent team and the satisfaction of our customers. Inco-Drilling does not obtain any business advantage through any illegal means.

The Company, its employees, its consultants, agents and any persons acting on its behalf are strictly forbidden to paying, offering or authorizing anything to any company or government in order to influence the award of a business or gain any business advantage. Furthermore, any contributions of the Company shares, stocks or assets to any political parties and organizations is strictly prohibited.

Any violation of this Policy by any Inco-Drilling's employees, consultants, agents and any persons acting on behalf of the Company may result in civil or criminal prosecution of the Company and the persons involved. Internally, any violation may result in disciplinary action including immediate termination.



Diana M. Tronco  
Managing Director

## **BUSINESS ETHICS**

### **POLICY**

Inco-Drilling is committed to the highest ethical business standards and compliance with the laws and regulations where we operate and the same is expected from its employees, consultants, agents and any persons acting on behalf of the Company.

Inco-Drilling obtain business through professionalism of its personnel and based on customer satisfaction. Inco-Drilling does not solicit nor keeps business through illegal practices like collusion, price fixing, slavery, etc. Any person working on behalf of our company, shall not accept, nor provide gifts or more than token value from any company or to an individual that does business with Inco-Drilling. They are expected to report and raise concerns when issues arise to their direct manager or top management.

Any violation of this Policy by any Inco-Drilling's employees, consultants, agents and any persons acting on behalf of the Company may result in civil or criminal prosecution of the Company and the persons involved. Internally, any violation may result in disciplinary action including immediate termination.



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Managing Director

## EMPLOYMENT & DIVERSITY PRACTICES POLICY

The success of Inco-Drilling depends on its ability to attract, develop and retain highly motivated and competent people. We believe that talent is independent of race, age, religion, gender and sexual orientation because diversity enriches the overall performance of the Company. We conduct business with due regard to human rights, dignity and respect to each individual to offer a safe, healthy, creative, positive and harassment-free work environment.

Inco-Drilling as well as its employees are committed to follow honest and non-discriminatory employment practices like hiring, developing, compensating, promoting and terminating personnel based on performance and merit.

All employees, consultants, agents and any person working on behalf of Inco-Drilling must work with and towards each other with respect and equality.

Any violation of this Policy by any Inco-Drilling's employees, consultants, agents and any persons acting on behalf of the Company may result in disciplinary action including immediate termination.



Diana M. Tronco  
Managing Director

## HARASSMENT POLICY POLICY

The success of Inco-Drilling depends on its ability to attract, develop and retain highly motivated and competent people. For this reason, we must offer a safe, creative, healthy and positive work environment free of harassment of any kind. All the employees, consultants, agents and any person working on behalf of Inco-Drilling shall be able to develop their careers by building up on their strengths of diversity while working together for the success of the Company. Any form of harassment is prohibited and will NOT be tolerated because it goes against the values of Inco-Drilling. In the special case of sexual harassment, it can include such things as:

- unwelcome sexual advances or propositions;
- any verbal or physical conduct of a sexual nature which unreasonably interferes with another person's ability to work or creates an intimidating, hostile or offensive work environment;
- personnel decisions such as hiring, promotion, compensation and continued employment, which are based on an employee's acceptance or rejection of sexual advances;
- inappropriate attempts at sexual humour.

Other forms of harassments due to a person point of view, religion, gender, sexual orientation, race, physical condition, age and cultural background could include things as jokes, horse play, mocking and bullying. Any individual that believes he or she has been subjected to harassment within the Company or any one Inco-Drilling does business with, shall report it immediately to management. All complaints will be treated as confidential and investigated free of retaliation. Any violation of this Policy by any Inco-Drilling's employees, consultants, agents and any persons acting on behalf of the Company may result in disciplinary action including immediate termination.



Diana M. Tronco  
Managing Director

## RISK MANAGEMENT POLICY

The present and future success on the company depends on offering quality services and competent personnel. Therefore, Inco-Drilling is keen to protect and preserve its people, property and reputation from loss or damage.

For this reason, Inco-Drilling manages risks associated with its operations and business strategy.

An appropriate and efficient implementation of the risk management process improves the quality of the decisions to protect our people and assets in any circumstances. Inco-Drilling engages and is committed to follow a risk management process that analyses hazards and control risks to an appropriate level of safety or quality. Top management is responsible of allocating appropriate resources for implementing risk control measures and also to provide employees with the authority to stop activities that possess high risks.

Inco-Drilling expects all its employees, consultants, agents and any persons acting on behalf of the Company to adhere, abide and promote a culture of risk identification and control to ensure the long-term success of the company.

Any violation of this Policy by any Inco-Drilling's employees, consultants, agents and any persons acting on behalf of the Company may result in civil or criminal prosecution of the Company and the persons involved. Internally, any violation may result in disciplinary action including immediate termination.



Diana M. Tronco  
Managing Director

## SUBSTANCE ABUSE POLICY

Inco-Drilling has the responsibility of providing a work place free from the adverse effects of alcohol, controlled substances and drugs. Any person working on behalf of Inco who work under the influence of alcohol, controlled substances or drugs present a risk to co-workers, customers, contractors, our community, our company and to themselves.

It is then our policy that any person impaired by the use of alcohol, controlled substances or drugs is strictly prohibited from entering our facilities, the facilities of our customers and contractors and from engaging in any business on behalf of Inco-Drilling. Furthermore, it is strictly forbidden to trade, use or possess any alcohol, controlled substances or drugs while on Inco-Drilling's premises or our customers' premises.

With exemption of prescribed drugs that do not affect the person's ability to perform his/her duties in a safe and professional manner. Inco-Drilling reserves the right to conduct tests in a professional manner without prior announcement to any person working on behalf of Inco Drilling; either at our facilities, at customer's facilities or on the road.

This policy must be administered and enforced in accordance with local laws where we operate, in the event of a conflict, the applicable laws shall apply.

Any violation of this policy including the refusal to be tested for substance abuse policy by any Inco-Drilling's employees, consultants, agents and any persons acting on behalf of the Company may result in disciplinary action including immediate termination.



Diana M. Tronco  
Managing Director



## IT SYSTEMS USAGE POLICY

Information Technology (IT) piracy is the illegal copying, installation, use, distribution, or sale of software in any way other than that is expressed in the license agreement.

***If any employee/consultant or any person working on behalf of Inco-Drilling uses unlicensed software in the corporate environment, they will be exposing the company to various risks, even if the application is running on a particular device.***

Inco-Drilling purchases and licenses software from a variety of sources. Any duplication of software except as permitted by related license agreements is a violation of the law and is therefore prohibited.

Installing unauthorized software on a computer system, workstation, or any other electronic system, can lead to potential system failures, data breaches, system degradation or viruses. Unauthorized installations also places Inco-Drilling and its employees at risk for civil and criminal action, which can result in punitive measures imposed on all involved parties.

Inco-Drilling employees, consultants or any other person working on behalf of Inco-Drilling who uses IT systems for work-related purposes must therefore abide to:

- Purchase, install, and/or use only software that has been authorized for use on Inco-Drilling computers.
- Obtain proper documentation for all work-related software purchases.
- Comply to the terms of all license agreements as they pertain to the use of software on Inco-Drilling issued computers
- Not use personal computers or any personal IT systems to store software or data of Inco-Drilling
- Not reproduce or duplicate software, in any way, except as provided by the license agreement between Inco-Drilling and the software manufacturer.
- Only software authorized by Inco-Drilling may be purchased, installed, or used on

Inco-Drilling -issued computers.

- Personal software, or software that an employee has acquired for non-business purposes, must not be installed on Inco-Drilling -issued computers.
- The only software permitted for installation on Inco-Drilling computers is authorized software for which Inco-Drilling has been granted a license.
- Software shall not be duplicated, reproduced, or installed on more than one machine without prior written authorization by Inco-Drilling.
- The software must be removed from the computer if the individual is no longer employed by Inco-Drilling.

Any violation of this Policy by any Inco-Drilling's employee, consultant, agent and any person acting on behalf of the Company may result in civil or criminal prosecution of the Company and the persons involved. Internally, any violation may result in disciplinary action including immediate termination and fines.

A handwritten signature in black ink, appearing to read 'Diana M. Tronco', with a large, stylized flourish at the end.

Diana M. Tronco  
Managing Director