



**BOART
LONGYEAR**

**GLOBAL CUSTOMS IMPORT
AND EXPORT COMPLIANCE
PROCEDURE**

December 2025

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Chapter 1

CORPORATE POLICY STATEMENT

I. REQUIRED USE OF THESE PROCEDURES

To ensure that Boart Longyear and its affiliated companies, Drilling Products, Drilling Services, and Veracio, comply with all applicable customs, export and import laws in every jurisdiction where we operate, all employees involved in international transactions must read and follow these Customs Compliance Procedures. Anyone engaged in the design, development, procurement, payment for, or delivery of imported or exported merchandise is expected to understand the sections relevant to their responsibilities. These requirements apply to all employees, directors, and officers.

Failure to comply with the regulatory obligations described in this Policy may expose both the Company and individual employees to serious legal, financial, and operational consequences. Non-compliance can result in civil or criminal penalties—including fines, imprisonment for individual violators, and restrictions on the Company's ability to conduct international business—as well as disciplinary action up to and including termination of employment.

The Director of Global Logistics / Freight Desk Manager will review these Customs Compliance Policies and Procedures regularly and update them as needed. Employees must promptly notify the freight management leadership team if they identify any conflict with local legislation. Where roles and activities involve affiliated companies other than Drilling Products, the Director of Global Logistics / Freight Desk Manager will work with the affiliated company to ensure they comply with this procedure before entering into transactions with third parties on their behalf.

This procedure supersedes the following documents: Global Customs Import Compliance Policies and Procedures Manual dated November 5, 2010, and LEG-0003-07 Global Trade Sanctions and Export Controls Policy dated November 20, 2007

II. ROLES AND RESPONSIBILITIES

To ensure compliance with all applicable customs and trade regulations, the Company assigns responsibility for import and export activities across several internal functions and external partners. These roles collectively support the accurate filing of documents, the lawful movement of goods, and adherence to regulatory requirements.

Internal Roles

Director of Global Logistics / Freight Desk Manager (Veracio: function performed by designated personnel)

Responsible for maintaining the Company's customs and trade-compliance procedures, monitoring regulatory requirements, supporting audits, and providing guidance on product classification, valuation, and country-of-origin determinations.

Freight Desk Team / Logistics Operator (Veracio: function performed by designated personnel)

Manage day-to-day import and export activities. This includes preparing shipment information, ensuring the accuracy and completeness of documentation, coordinating with brokers and forwarders, and addressing shipment delays, holds, or exceptions.

Procurement / Product Teams / Engineering

Provide accurate product data, country-of-origin information, supplier documentation, and any technical details needed to support classification decisions, export controls, and duty-reduction programs.

Finance / Tax / Legal / Internal Audit

Support compliant valuation, duty payments, recordkeeping, internal controls, and responses to audits or regulatory inquiries. These functions ensure that customs compliance actions align with transfer-pricing policies, tax reporting requirements, accounting standards, and applicable legal

obligations, and they assess any tax impacts arising from valuation adjustments, post-entry corrections, or prior disclosures.

External Roles

Customs Brokers

Licensed partners are responsible for transmitting import entry data, submitting required documents, paying duties on behalf of the Company, and following the Company's documented instructions regarding classification, valuation, and other filing requirements.

Freight Forwarders and Carriers

Coordinate transportation, prepare and transmit transport documents, support export filings where authorized, and ensure shipments move in accordance with routing requirements and Incoterms.

External Compliance Company

Provides specialized customs and trade-compliance support, including classification assistance, regulatory interpretation, broker oversight, and audit support. They act as an extension of the Company's compliance function for complex or high-risk transactions.

Suppliers and Customers

Suppliers must provide accurate invoices, country-of-origin information, certificates, and product details. Customers may be required to provide end-use or end-user information and other documentation relevant to export compliance.

Government Agencies

Regulate and enforce compliance requirements, including licensing, restrictions, permits, certifications, and inspections associated with specific products or transactions.

III. GOVERNANCE

The Company will maintain all required records for the time periods specified by applicable law. All employees involved in import, export, or related recordkeeping activities must be familiar with the Recordkeeping Chapter of this manual, as well as any recordkeeping requirements referenced in other sections.

Chapter 2

TARIFF CLASSIFICATION

I. PURPOSE

The purpose of this section is to ensure that all Company products are accurately classified under the Harmonized System (HS) or applicable national tariff schedules. Correct tariff classification is essential for determining duty rates, licensing requirements, country-specific restrictions, and eligibility for preferential duty programs. This policy provides the standards and procedures employees must follow to maintain accurate and compliant classifications across all jurisdictions in which the Company operates.

II. BACKGROUND

The Harmonized System (HS) is the global classification framework administered by the World Customs Organization (WCO) and used by customs authorities worldwide. It serves as the basis for national tariff schedules and is updated every 5 years.

Key references include:

WCO HS Nomenclature

<https://www.wcoomd.org/en/topics/nomenclature/instrument-and-tools/hs-nomenclature-2022-edition.aspx>

WCO Classification Decisions (Opinions & Amendments)

https://www.wcoomd.org/en/topics/nomenclature/instrument-and-tools/tools-to-assist-with-the-classification-in-the-hs/hs_classification-decisions.aspx

Country-specific tariff schedules derive from the HS and must be used where applicable:

- United States – HTSUS
<https://hts.usitc.gov/>
- European Union – TARIC
https://ec.europa.eu/taxation_customs/dds2/taric/taric_consultation.jsp
- Canada – Customs Tariff
<https://www.cbsa-asfc.gc.ca/trade-commerce/tariff-tarif/menu-eng.html>
- China – GACC Tariff Schedule
<http://english.customs.gov.cn/>
- Australia – Working Tariff
<https://www.abf.gov.au/importing-exporting-and-manufacturing/tariff-classification/current-tariff>

Binding rulings and published decisions may also be used:

- U.S. CBP CROSS Rulings
<https://rulings.cbp.gov/>
- EU Binding Tariff Information (BTI)
https://ec.europa.eu/taxation_customs/dds2/ebti/ebti_consultation.jsp
- Canada Customs Tariff
<https://www.cbsa-asfc.gc.ca/trade-commerce/tariff-tarif/menu-eng.html>

III. RESPONSIBILITIES

- **Director of Global Logistics / Freight Desk Manager**- Responsible for maintaining the tariff-classification methodology, determining, and approving final HS/HTS classifications, updating the classification database, consulting external experts when necessary, and ensuring brokers use the Company-approved classifications.
- **Engineering / Product Teams** - Provide complete and accurate technical specifications, materials, drawings, and product details necessary to support proper tariff classification and notify Trade Compliance when changes occur.
- **Procurement / Sourcing** - Ensure suppliers provide required product descriptions, technical data, and supporting documentation related to classification.
- **Customs Brokers** - Use only Company-approved tariff classifications when filing customs entries and notify the Company if discrepancies arise in commercial or shipping documents.
- **External Compliance Company** - Supports BLY by performing independent tariff classification review, verifying HS/HTS codes, and confirming alignment with the Harmonized System, WCO Explanatory Notes, country-specific legal notes, binding rulings, and applicable regulatory interpretations. Assists in resolving classification disputes, preparing classification documentation, supporting sampling reviews, and drafting requests for binding rulings when needed.
- **Legal Department:** - Advises on disputes, classification conflicts, or regulatory uncertainties. Supports escalation of classification disagreements with customs authorities, reviews binding ruling requests, evaluates legal risk, and provides guidance when classification impacts anti-dumping duties, licensing, sanctions, or import restrictions.

IV. LEGAL CONSEQUENCES

- Accurate tariff classification is a legal requirement in every country where the Company operates. Misclassification may result in actions by customs authorities, including:
 - reassessment of duties and taxes,
 - interest charges,
 - administrative penalties,
 - delays, detentions, or seizures of goods,
 - denial of preferential duty claims, and
 - requirements to correct historical filings.
- In certain jurisdictions, intentional or repeated violations may carry additional legal consequences. These actions may apply to the Company as the importer or exporter of record and may affect external service providers acting on the Company's behalf.
- The Company will cooperate with customs authorities when discrepancies arise and will take internal corrective actions to prevent recurrence.

V. REQUIREMENTS

- All Company products must be classified accurately under the HS and applicable national tariff schedules (e.g., HTSUS for U.S. shipments, TARIC for EU shipments).
- Classification must be based on authoritative sources, including:
 - HS nomenclature
 - WCO Explanatory Notes

- national tariff schedule legal notes
- binding rulings and administrative guidance
- The Company must maintain an updated classification database covering all products and review it regularly.
- Technical personnel must be consulted when materials, manufacturing processes, or product specifications influence classification.
- External or regulatory guidance must be sought for complex or uncertain classifications.
- Tariff classification must be confirmed before import or export for all shipments, without exception.
- Periodic verification must be conducted through sampling of import and export documentation to ensure correct declarations.

VI. PROCEDURES

1. Identify the Product - Gather all relevant product details, including technical specifications, composition, manufacturing processes, and product drawings. Consult engineering or product teams as needed.
2. Determine the Appropriate HS Code – Review:
 - a. the HS structure,
 - b. WCO Explanatory Notes,
 - c. national tariff schedule legal notes.
 - d. Select the heading and subheading that best describes the product.
3. Review Country-Specific Tariff Schedules - Validate classification in the importing or exporting country using the applicable tariff schedule (e.g., HTSUS, TARIC).

Reference: [Apply the General Rules of Interpretation \(GRI's\) and Additional US Rules of Interpretation](#)

4. Assess Regulatory Impact - Determine whether the classification impacts:
 - a. duty rates,
 - b. quotas or licensing,
 - c. restrictions or prohibitions,
 - d. anti-dumping or countervailing duty applicability,
 - e. preferential trade program eligibility.
5. Document and Record the Classification –
 - a. Update the Company's internal classification database and retain supporting documents.
 - b. Enter the 6-digit HTS classification for the article, and the code will be recorded in the MXP database. The information stored in the MXP database will be made available to BLY's customs brokers.
6. Seek Official Guidance as Needed
 - a. When uncertainty remains, request:
 - b. External Expert Opinions, or
 - c. binding rulings from customs authorities.
7. Pre-Shipment Verification - Before shipment, confirm the HS/HTS code used matches the Company's classification database.
8. Periodic Compliance Review - Conduct sampling of import and export entries to confirm accurate classification. Address discrepancies promptly and implement corrective action as required.

Chapter 3

CUSTOMS VALUATION

I. PURPOSE

Establish the procedures BLY must follow to determine the customs value of imported goods in accordance with global and U.S. valuation laws.

II. BACKGROUND

Customs valuation is governed internationally by the WTO Agreement on Implementation of Article VII of the GATT 1994.

Global Reference: https://www.wto.org/english/docs_e/legal_e/20-val_01_e.htm

The United States implements this agreement through 19 U.S.C. § 1401a.

U.S. Reference:

<https://www.govinfo.gov/content/pkg/USCODE-2024-title19/pdf/USCODE-2024-title19-chap4-subtitleIII-partI-subparta-sec1401a.pdf>

III. RESPONSIBILITIES

- **Director of Global Logistics / Freight Desk Manager** - Responsible for interpreting valuation rules, determining valuation methodology, confirming required additions to transaction value, validating related-party pricing, and ensuring valuation is correctly applied before entry.
- **Finance / Accounts Payable** - Provide proof of payment, commercial terms, price adjustments, rebates, and any financial records required for determining customs value.
- **Procurement / Sourcing** - Ensure suppliers provide accurate commercial invoices, pricing terms, and any royalty, asset, or tooling information relevant to valuation.
- **External Compliance Company** - Provides independent valuation expertise to ensure the Company's practices conform to the WTO Valuation Agreement and U.S. valuation laws. Supports application of the valuation hierarchy, validates treatment of assets, royalties, and related-party pricing, and conducts independent reviews or advisory assessments when the Company requires external validation or specialty knowledge.
- **Customs Brokers** - File customs entries using the Company-approved customs value and notify the Company of discrepancies in invoices, packing lists, or commercial documents.
- **Legal Department** - Provides authoritative legal interpretation of global and U.S. customs valuation requirements, reviews high-risk or complex valuation scenarios, advises on related-party acceptability, and approves escalation to outside counsel when required. The Legal Department also supports the Company in responding to customs inquiries, audits, penalties, or enforcement actions.

IV. REQUIREMENTS

1. The Company must apply the valuation methods in the order required by the WTO Agreement and 19 U.S.C. § 1401a.
2. Transaction value—the price actually paid or payable for the goods—must be used whenever permitted by law.
 - Transaction value applies only when there is a bona fide sale for export to the country of importation, and when the price is acceptable under related-party rules.
3. Used, Depreciated, and Transferred Assets

- For used or depreciated equipment transferred between BLY entities, the Company must follow the valuation hierarchy in the WTO Valuation Agreement <https://www.wcoomd.org/en/topics/valuation/overview/wto-valuation-agreement.aspx> and U.S. valuation law under 19 U.S.C. § 1401a <https://www.cbp.gov/document/publications/customs-valuation-under-trade-agreements-act-1979>
 - Internal book value or depreciation cannot be used as customs value unless it reflects a real sale price acceptable under related-party rules. If no sale occurs, or if the transfer price is not acceptable, BLY must apply the next valuation methods in order and may use depreciation only as part of a reasonable fallback-method estimate. Depreciation may support fair-market valuation under the fallback method but does not, by itself, determine customs value.
4. Required additions to transaction value must be included when applicable, including:
 - assists,
 - packing costs,
 - selling commissions,
 - royalties and license fees that are a condition of sale,
 - proceeds of resale returned to the seller.
 5. Non-dutiable costs must not be included in customs value.
 6. Related-party transactions must meet the arm's-length requirements under the WTO and U.S. valuation rules.
 7. All valuation decisions must be supported by documented evidence.
 8. Valuation must be verified before entry and reviewed periodically for accuracy.

V. PROCEDURES

1. Collect the commercial invoice and all relevant commercial agreements.
2. Determine whether the transaction value applies under the WTO/U.S. rules.
3. Identify and add any required elements to the customs value.
4. Exclude any non-dutiable charges.
5. Record the customs value and retain supporting documentation.
6. Provide the customs value to the customs broker prior to filing the entry.
7. Refer complex or uncertain valuation cases to qualified compliance personnel.
8. Conduct periodic reviews of import entries to ensure compliance with valuation requirements.

Chapter 4

COUNTRY OF ORIGIN DETERMINATION AND MARKING & EXPORT LICENSE REVIEW FOR DUAL USE ITEMS

I. PURPOSE

This procedure defines BLY's internal workflow for determining the country of origin of products and ensuring compliant origin marking, and applying the import and export-control requirements associated with dual-use and export controlled products. Global customs authorities maintain technical origin and marking rules. BLY complies with these authoritative standards and applies internal controls to ensure consistent and accurate implementation. Dual-use items—goods with both civilian and potential military or export controlled applications—require enhanced review, documentation, and may require an import or export license before shipment.

Export-control and sanctions requirements related to origin, dual-use classification, or temporary admissions are further detailed in Chapter 10 – Global Trade Sanctions & Export Controls. Chapter 4 addresses these topics only insofar as they relate to origin determination and product marking.

II. BACKGROUND

Country of origin is a foundational component of global customs compliance. Customs authorities require imported goods—or their containers—to be marked with the correct country of origin. The marking must be clear, permanent, and understandable to the ultimate purchaser.

Correct origin determination ensures compliance with customs marking requirements, origin-based duty rates, antidumping and countervailing duty applicability, trade preference programs, import restrictions or prohibitions, and accurate customs declarations. Because origin and marking rules evolve through regulatory updates, court decisions, and agency rulings, BLY references authoritative external publications as the basis for applying rules of origin markings.

Some BLY products may also qualify as dual-use items. Dual-use refers to goods that have legitimate commercial applications but also possess technical characteristics that could enable military, strategic, or controlled uses. Dual-use status does not change the method for determining country of origin or the required origin marking. However, it increases the importance of accurate origin determination because export-control classifications, licensing requirements, and destination-country restrictions depend heavily on the product's origin, processing history, and marking.

For this reason, BLY incorporates enhanced review steps for dual-use items. These steps ensure that origin determinations, marking, and export-control classifications remain aligned so that dual-use items are not exported without proper authorization or required licenses.

Comprehensive export control, sanctions, licensing, and restricted-party requirements are addressed in Chapter 10. Chapter 4 references these considerations only where they influence origin, marking, or classification determinations.

III. EXTERNAL AUTHORITATIVE STANDARDS

BLY follows the origin and marking rules issued by global customs authorities and standards bodies. These external sources contain the controlling legal rules and are incorporated by reference into BLY's compliance framework.

Customs Origin & Marking Standards

World Customs Organization – Origin Compendium:

<https://www.wcoomd.org/en/topics/origin/overview/origin-compendium.aspx>

World Customs Organization – HS Explanatory Notes:

<https://www.wcotradetools.org/en/harmonized-system>

U.S. CBP – 19 CFR Part 102 (Marking Rules): <https://www.ecfr.gov/current/title-19/chapter-I/part-102>

U.S. CBP – 19 CFR Part 134 (Country of Origin Marking): <https://www.ecfr.gov/current/title-19/chapter-I/part-134>

CBP Informed Compliance Publication: Country of Origin Marking:

<https://www.cbp.gov/trade/rulings/informed-compliance-publications/markings-country-origin-us-imports>

FTC – Complying With the Made in USA Standard: <https://www.ftc.gov/business-guidance/resources/complying-made-usa-standard>

European Union – Union Customs Code: https://taxation-customs.ec.europa.eu/customs-4/union-customs-code_en

Canada Border Services Agency – Origin and Marking <https://www.cbsa-asfc.gc.ca/publications/dm-md/d11/d11-3-1-eng.html>

Dual-Use & Export-Control Standards

U.S. Export Administration Regulations (EAR) – Bureau of Industry and Security (BIS):

<https://www.bis.doc.gov/index.php/regulations/export-administration-regulations-ear>

U.S. Commerce EAR Table of Contents

<https://www.bis.gov/regulations/ear/table-of-contents>

EU Dual-Use Regulation (Regulation (EU) 2021/821):

<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021R0821>

Wassenaar Arrangement – Dual-Use and Munitions Lists:

<https://www.wassenaar.org/control-lists/>

Global Affairs Canada – Export Controls

https://www.international.gc.ca/controls-controles/about-a_propos/expor/before-avant.aspx?lang=eng

These sources provide authoritative legal rules for determining whether an item is classified as dual-use, requires an export license, or is subject to shipment restrictions.

IV. RESPONSIBILITIES

- **External Compliance Company** - confirms the correct origin methodology. They review supplier and manufacturing data, validate bills of materials for origin purposes, confirm marking requirements, and respond to customs notices with Legal Department support. Supports complex origin and marking questions. They review supplier and manufacturing data, validate origin under the make-part sourcing rules when needed, and assist with binding rulings or customs inquiries requiring specialized expertise

Performs dual-use screening, classification validation, and export license applicability reviews when a product contains export controlled technical features. All export control and sanctions decisions, including licensing and restricted-party implications, must follow the requirements outlined in Chapter 10.

- **Procurement**- verifies supplier information and production locations. They confirm where parts are made, monitor supplier changes, and ensure vendors provide accurate origin-related data. Obtains supplier export control and dual-use declarations from the manufacturers and distributors that resell the products.
- **Product Teams / Engineering** - Confirm manufacturing steps for make-parts and assemblies. Validate bills of materials, processing steps, and technical characteristics that may affect origin or dual-use status. Provide information required for export-control classification.
- **Director of Global Logistics / Freight Desk Manager** - Ensures approved origin and marking requirements are followed during import activities. Oversees repacking controls, certificates, and required notices. Approves dual-use classifications, export-license determinations, and broker instructions prior to shipment. Ensures import and export-control determinations are completed prior to shipment.
- **Freight Desk Team** - Organizes and schedules shipments. Ensures brokers, carriers, and warehouses receive accurate origin information, marking instructions, and dual-use classification details. Confirms shipments requiring an export license do not move before approval.
- **Logistics Operator** - Verifies inbound goods show the correct country-of-origin marking. Preserves markings during handling and applies replacement markings when required. Identifies items with potential dual-use characteristics (as indicated by supplier declarations, engineering notes, or value/technical attributes) and escalates to the Freight Desk Team.
- **Legal Department** – Provides legal interpretation of origin, marking, dual-use, and temporary-admission obligations. Reviews complex or high-risk origin determinations, supports responses to customs notices, and advises on the legal consequences of converting temporary admissions into standard imports. Legal Department approves escalations to outside counsel and ensures alignment with global regulatory requirements. Advises on import and export-control implications, license requirements, and penalties.

V. REQUIREMENT

BLY must:

- Determine the correct country of origin for all products before importation.
- Ensure accurate and compliant origin marking on goods and packaging in accordance with destination-country requirements.
- Identify potential dual-use items and conduct import and export-control classification reviews.
- Provide suppliers with clear origin, marking, and import and export-control data requirements.
- Ensure brokers receive approved origin, marking, and dual-use instructions.
- Apply for and receive import and export licenses when required before shipment.
- Maintain internal controls over repacking and relabeling.
- Respond promptly to customs or export-control inquiries.
- Retain all supporting origin and export-control documentation for required retention periods.

- Track goods entering under temporary admission, ensure correct origin marking is preserved, and determine whether a temporary admission converts to a standard import (such as when goods are sold within two years). Apply full origin rules and update import documentation if the entry status changes.

VI. PROCEDURES

- a. Origination Determination (Pre-import Only)
 - b. External Manufacturing (Supplier-Produced Goods)
 - i. Procurement obtains the supplier's country of manufacture and required sourcing declarations and dual use certifications as applicable.
 - ii. The External Compliance Company reviews the supplier's information and applies the appropriate origin rules to determine the correct country of origin.
 - c. Internal Manufacturing (BLY-Produced or Assembled Goods)
 - i. Engineering and Product Teams submit complete internal manufacturing and processing details, including bills of materials, production locations, and make-part steps.
 - ii. The External Compliance Company reviews the internal manufacturing data and determines the country of origin using the applicable methodology.
2. Dual-Use Review and Export Control Classification (Import & Export Controls)
Dual-use classification, restricted-party screening, and licensing requirements must be conducted in accordance with Chapter 10 – Sanctions & Export Controls.
- a. Identification and Escalation
Any item with potential dual-use characteristics or export controlled technical features is escalated to the External Compliance Company for import- and export-control review.
 - b. Classification
The External Compliance Company, with Legal Department support, determines whether the item is export controlled under:
 - U.S. EAR
 - EU Dual-Use Regulation
 - Wassenaar Arrangement
 - Canadian, Australian, or other national control lists

Determinations include:

 - dual-use status
 - ECCN or equivalent classification
 - import license requirements.
 - export license requirements.
 - destination, end-user, and end-use restrictions
 - c. Licensing
The External Compliance Company provides recommended licensing requirements.
The Director of Global Logistics / Freight Desk Manager approves classifications and ensures license applications proceed when required.
 - d. Shipment Hold
No import or export may proceed until:
 - dual-use classification is approved, and
 - required import and/or export licenses are issued.

3. Recording and Release
 - a. Master Data Update
The Director of Global Logistics / Freight Desk Manager records the approved origin, dual-use classification, ECCN (if applicable), and license status in the Company's master data.
 - b. Shipment Preconditions
No inbound or outbound movement may occur until origin and export-control classifications are approved.
4. Product and Container Marking
 - a. Import marking determination is performed by the External Compliance Company, which prepares the required origin-marking instructions in accordance with the rules of the importing country.
 - b. Procurement provides marking instructions to external suppliers producing finished goods or components.
 - c. Engineering and Product Teams apply the marking requirements to internally manufactured or assembled products and ensure product design supports compliant marking placement.
 - d. Markings must be conspicuous, legible, permanent, and not misleading.
 - e. Acceptable formats include "Made in [Country]" or "Product of [Country]," presented in a manner that does not conflict with other geographic references.
 - f. Marking methods may include molding, stamping, engraving, printing, or securely affixed labels.
 - g. Markings must not conflict with any required export-control label or identifier.
5. Repacking Controls
 - a. Logistics Operators must keep original country-of-origin markings visible when repacking products.
 - b. If the original marking is obscured, removed, or damaged, Logistics Operators must apply the correct country of origin to the new outer container in line with regulatory requirements.
 - c. The Freight Desk Team files any required repack certificates with the appropriate customs authority.
 - d. The Freight Desk Team ensures repack notices are issued to downstream recipients when required by law.
6. Kits and Sets
 - a. Engineering and Product Teams provide configuration details for kits and sets.
 - b. The External Compliance Company determines origin-marking requirements for each component and for the set as a whole.
 - c. Each item must be individually marked unless a regulatory exception allows otherwise.
 - d. The External Compliance Company approves any simplified or consolidated marking method permitted by regulation.
7. Substantial Transformation Assessments
 - a. When goods are processed in more than one country, the External Compliance Company determines whether a substantial transformation has occurred.
 - b. Engineering and Product Teams provide the necessary manufacturing and processing details.
 - c. If the determination is unclear, the External Compliance Company may consult the Legal Department or additional customs consultants.
 - d. The External Compliance Company may request a binding ruling from the relevant customs authority if additional clarification is required.
8. Customs Notices (Import-Only)
 - a. All customs notices, detentions, marking inquiries, or related correspondence must be forwarded immediately to the Director of Global Logistics / Freight Desk Manager.
 - b. The External Compliance Company prepares draft responses to customs notices.
 - c. The Director of Global Logistics and the Legal Department review and approve responses prior to submission.

9. Temporary Admissions – Origin, Marking, and Tracking
 - a. Pre-Import Screening
 - i. The Freight Desk Team identifies whether an inbound item will enter under a temporary admission regime (e.g., temporary import status, inward processing, Carnet, or similar program).
 - ii. Procurement and Engineering confirm origin and verify that any export controlled items have valid export-control classifications (ECCN or equivalent).
 - iii. Temporary admission does not change origin; however, export controlled items must maintain export-control documentation for eventual re-export.
 - b. Entry Under Temporary Admission
 - i. The Freight Desk Team ensures the broker files the correct temporary admission entry type.
 - ii. Origin marking must remain visible while the goods are in temporary status.
 - iii. Logistics Operators verify that markings remain intact during handling.
 - c. Tracking and Monitoring
 - i. All temporary admission items are recorded in the temporary admission log maintained by the Freight Desk Team.
 - ii. The log must include product identifier, serial number, origin, admission date, expiration date, location, and intended use.
 - iii. The Freight Desk Team monitors expiration dates and escalates potential violations to Legal Department and the Director of Global Logistics.
 - iv. For export controlled items, the Freight Desk Team ensures that the export-control classification and any required license are available before re-export.
 - d. Change in Use or Sale While under Temporary Admission
 - i. If an item admitted temporarily is sold, transferred, consumed, or otherwise remains in-country beyond the period allowed by the applicable temporary admission program, the entry must be converted to a standard import. The allowable period varies by jurisdiction and program (e.g., up to 24 months in some regions).
 - ii. The Freight Desk Team reviews whether any origin, marking, or export-control attributes require confirmation. Any complex determinations or dual-use considerations are escalated to the External Compliance Company and Legal Department as needed.
 - iii. The Freight Desk Team files a corrected or supplemental import entry when required.
 - iv. If later exported, the item must undergo export-control screening based on its ECCN, destination, and end-user.
 - e. Re-Export of Temporary Admission Goods
 - i. Logistics Operators verify original marking and confirm no export-control prohibitions apply.
 - ii. The Freight Desk Team provides the broker with origin and temporary admission data and ensures export-control license requirements are satisfied.
 - iii. The Freight Desk Team records the re-export in the temporary admission log.
 - f. Non-Compliance or Irregularities
 - i. Missing, incorrect, obscured, or altered origin marking must be escalated immediately to the External Compliance Company and the Legal Department.
 - ii. Any irregularity affecting temporary-admission requirements—including improper handling, incorrect entry type, or failure to track expiration—must be escalated.
 - iii. Any issue involving export controlled or dual-use items that may violate import or export-control rules (including missing ECCN, end-use concerns, or unlicensed export) must be reported immediately to the External Compliance Company and the Legal Department.
 - iv. Failure to properly re-export a temporary admission item or convert it to a standard import within the allowable period may result in duties, penalties, or regulatory findings.
 - v. The Legal Department advises on all corrective actions, including import-duty liabilities, export-control licensing implications, penalty mitigation, and required disclosures.

VII. GOVERNANCE

1. Record Keeping

All origin-related, marking, dual-use, and export-control documentation—including supplier declarations, manufacturing data, technical analyses, substantial-transformation reviews, ruling requests, classification evaluations, and import or export-license files—must be retained in accordance with all applicable laws and jurisdiction-specific retention requirements.

Recordkeeping obligations related to export-control licensing and sanctions screening are described in detail in Chapter 10.

For U.S. imports, records must be kept for a minimum of five (5) years from the date of entry. All records must be stored in the Company's designated compliance document repository or another approved system that ensures retrievability and audit readiness.

2. Procedure Review

The Director of Global Logistics / Freight Desk Manager, in coordination with the External Compliance Company and the Legal Department, reviews this procedure at least annually to ensure ongoing alignment with authoritative external standards, regulatory updates, and BLY operational requirements.

Updates are implemented as required and communicated to all affected functions.

3. Internal Audit

The Internal Audit function, in coordination with the Director of Global Logistics / Freight Desk Manager, the External Compliance Company, and the Legal Department, may conduct periodic audits of origin determination, marking controls, dual-use classification, export-control licensing reviews, and temporary-admission tracking to verify compliance with this procedure.

Internal Audit may review:

- the accuracy and methodology of origin determinations for internal and external manufacturing,
- supplier documentation and declarations,
- the accuracy and completeness of master-origin and dual-use classification data,
- adherence to marking and repacking controls,
- export-control classifications and license requirements,
- temporary-admission logs, expiration tracking, and conversion processes,
- responses to customs or export-authority inquiries, and
- the completeness and integrity of retained records.

Internal Audit communicates any findings to the Director of Global Logistics / Freight Desk Manager, the External Compliance Company, and the Legal Department, who are responsible for coordinating corrective actions and implementing process improvements to prevent recurrence.

Chapter 5

FREE TRADE AGREEMENT (FTA) PREFERENTIAL ORIGIN PROCEDURE

I. PURPOSE

This procedure establishes the policies and processes BLY personnel must follow when claiming preferential tariff treatment under any Free Trade Agreement (“FTA”). This includes, but is not limited to:

- United States–Mexico–Canada Agreement (USMCA/CUSMA/T-MEC)
- Australia–United States Free Trade Agreement (AUSFTA)
- United States–Chile Free Trade Agreement (U.S.–Chile FTA)
- Any other bilateral or multilateral FTA applicable to BLY products.

These procedures help ensure compliance with the customs laws and implementing regulations of the importing country and demonstrate BLY’s exercise of reasonable care when making preferential duty claims.

USMCA-specific requirements are contained in **Section VIII** of this procedure.

II. BACKGROUND

FTAs reduce or eliminate duties for goods that “originate” under the agreement’s rules. While each FTA has its own rules of origin, certification formats, and verification procedures, most share core concepts:

- Goods must meet a product-specific rule of origin (PSRO).
- Many FTAs allow regional value content (RVC) as an alternative means of qualification.
- Claims for preferential treatment must be supported by complete origin documentation.
- Customs authorities regularly conduct verifications, audits, and producer questionnaires.

BLY relies on the authoritative regulations and guidelines issued by FTA governments when determining origin and supporting preferential claims.

USMCA-specific background is provided in Section VIII.

III. EXTERNAL AUTHORITATIVE STANDARDS

a. General FTA Standards

BLY follows the controlling rules, guidelines, and implementing regulations issued by:

- Customs authorities of the importing country
- FTA-specific regulations, uniform regulations, or implementing instructions.
- World Customs Organization (WCO) origin and classification resources
- Product-Specific Rules of Origin (PSROs) for each FTA
- Binding rulings or official origin determinations

b. USMCA – Specific Standards

- USMCA Uniform Regulations
- U.S. Customs & Border Protection (CBP) – USMCA Implementation Resources
Includes origin guidance, verifications, and certification requirements.
<https://www.cbp.gov/trade/priority-issues/trade-agreements/USMCA>
- Canada Border Services Agency (CBSA) – CUSMA Implementation & Origin Marking
<https://www.cbsa-asfc.gc.ca/publications/dm-md/d11/d11-3-3-eng.html>
- Mexico SAT – T-MEC Implementation Information
(Government origin rules, certification guidance, and verification procedures.)
<https://www.gob.mx/t-mec>

These standards apply in addition to the general FTA rules.

IV. DEFINITIONS

Free Trade Agreement (FTA) - A bilateral or multilateral trade agreement providing preferential tariff treatment for goods that meet specific rules of origin. Examples include USMCA/CUSMA/T-MEC, AUSFTA, U.S.–Chile FTA, and others.

Preferential Tariff Treatment -A reduction or elimination of customs duties for goods that qualify as originating under an applicable FTA. Preferential treatment may be claimed at the time of entry or through post-entry correction, depending on the importing country's rules.

Originating Goods - Goods that qualify for preferential tariff treatment because they satisfy the FTA's criteria, which typically include: wholly obtained or produced, produced exclusively from originating materials, or produced using non-originating materials that meet the applicable tariff-shift rule, regional value content (RVC), or other product-specific requirement.

Product-Specific Rule of Origin (PSRO) - A rule assigned to each HS code under an FTA that specifies the conditions under which the product qualifies as originating. PSROs commonly include tariff shift requirements, regional value content thresholds, or specific processing operations.

Regional Value Content (RVC) -A method used by many FTAs to determine whether a sufficient percentage of a product's value originates within the FTA region. The formula and calculation method vary by agreement.

Certificate of Origin / Origin Declaration - A written statement—formal certificate or free-form declaration—containing the minimum data elements required by the applicable FTA to support a preferential tariff claim.

Blanket Period - A period (often up to 12 months) during which repeated shipments of identical goods may be covered by a single Certificate of Origin or origin declaration if the applicable FTA allows it.

Verification - A process conducted by a customs authority to confirm the accuracy of a preferential origin claim, including questionnaires, document requests, audits, or site visits.

Reasonable Care - The obligation to ensure FTA claims are accurate, well-documented, and supported by records.

Implementing Regulations / FTA Administrative Guidance - Legal rules, administrative guidance, or uniform regulations (where applicable) issued by the customs authorities of an FTA party to interpret and administer the agreement's origin rules, certification requirements, and verification processes.

PSRO Schedule - The tariff-shift and RVC table associated with each FTA that lists origin requirements for all HS classifications.

Importer - The entity that imports goods under an FTA and claims preferential tariff treatment. The importer must possess or obtain proof of origin within the timeframe required by law.

Exporter - The entity that exports goods and may issue a Certificate of Origin or origin declaration, if permitted by the FTA.

Producer - The entity that manufactures, assembles, or substantially transforms the goods and may complete a Certificate of Origin when allowed by the applicable FTA.

External Compliance Company (Trade Compliance Function) - The third-party compliance provider retained by BLY to perform the trade-compliance function, including origin validation, PSRO and RVC analysis, Certificate of Origin review, and support during customs verifications.

V. RESPONSIBILITIES

Global Logistics / Freight Desk Manager

- Oversees BLY's FTA compliance program.
- Ensures BLY claims preferential treatment only for validated originating goods.
- Maintains templates, validated parts lists, and internal controls supporting origin determinations.
- Coordinates all customs verifications and escalates issues to Legal Department.
- Serves as BLY's authorized signatory for Certificates of Origin (including USMCA).

External Compliance Company

- Performs origin validation using supplier declarations, BOMs, and manufacturing data.
- Applies the appropriate PSRO and RVC calculations.
- Supports preparation and review of Certificates of Origin.
- Provides technical interpretation and assists with customs verifications.

Engineering / Sourcing / Procurement

- Provide accurate BOMs, costed materials, and manufacturing details.
- Notify the External Compliance Company when suppliers, materials, or processes change.

Suppliers / Producers

- Provide complete, accurate origin declarations and supporting data.
- Update certificates/declarations when information changes.

Warehouse / Logistics Operations

- Ensure documents and shipments reflect validated origin status.
- Prevent incorrect FTA claims during shipment or repacking.

Legal Department

- Advises on origin rules, verifications, and compliance risks.
- Supports disclosures, responses to customs challenges, or adverse determinations.

VI. REQUIREMENTS

BLY must:

- Claim preferential treatment only when origin is fully validated.
- Maintain internal controls for PSRO and RVC analysis, supplier declarations, and BOM review.
- Retain all FTA-related records for at least five years or longer when required.
- Correct any incorrect claims through post-entry amendment or disclosure.
- Consult the External Compliance Company or Legal Department for complex determinations or verifications.

VII. PROCEDURES

1. Eligibility Review

- Engineering/Sourcing provides BOMs, costed materials, and supplier data.
- External Compliance Company evaluates the information under the applicable FTA's rules.
- Only validated originating goods may receive preferential treatment.

2. Certificate of Origin / Origin Declaration

- Use BLY's standard template or FTA-specific form.
- Certificates must contain all required data elements.
- Blanket certificates allowed only when permitted and must be renewed annually.
- The Global Logistics / Freight Desk Manager is the authorized BLY signatory.

3. Determining Origin

- The External Compliance Company determines if the good is wholly obtained, produced from originating materials, or meets the PSRO (tariff shift/RVC).
- Complex determinations may require supplier cost data or producer verification.

4. Verification & Reasonable Care Controls

- Ongoing monitoring of claims and updates to origin status.
- Supplier-origin changes or BOM revisions are evaluated promptly.
- Customs verifications coordinated through the Global Logistics / Freight Desk Manager with support from External Compliance and Legal Department.

5. Recordkeeping

BLY retains:

- certificates and origin declarations,
- supplier statements,
- BOMs and costed materials,
- PSRO analyses,
- import documentation,
- all verification correspondence.

VIII. USMCA / CUSMA / T-MEC SPECIFIC REQUIREMENTS

1. Overview - USMCA entered into force on July 1, 2020. It replaced NAFTA and provides preferential treatment for originating goods traded among the United States, Canada, and Mexico.

2. USMCA-Specific Definitions

- USMCA Certification of Origin – A written certification containing the required minimum data elements.
- Uniform Regulations – Trilateral rules interpreting the agreement.
- Origin Criterion – A, B, C, or other criteria defined in the agreement.

3. USMCA Certification Requirements

- No government-prescribed form (no CBP Form 434).
- Required data elements: certifier, exporter, importer, producer, description, HS classification, origin criterion, blanket period (if applicable), and certification statement.
- Certifications may be issued by exporter, producer, or importer (where permitted).

4. USMCA Origin Rules

A good is originating if it:

- is wholly obtained,
- uses only originating materials, or
- meets the PSRO (tariff shift and/or RVC).

5. RVC Requirements

USMCA specifies its own formulas for transaction value and net cost.

Costed BOMs may be required during verifications.

6. USMCA Verification Process

Verifications may include:

- producer questionnaires,
- requests for costed BOMs,
- supporting origin documentation,
- exporter/producer site visits.

All verifications must be coordinated by the Global Logistics / Freight Desk Manager with support from the External Compliance Company and Legal Department.

IX. GOVERNANCE

Recordkeeping

All FTA origin-related records—including Certificates of Origin, supplier declarations, PSRO/RVC analyses, import documentation, and verification correspondence—must be retained in accordance with the Company's Recordkeeping Chapter.

Audit & Oversight

The Global Logistics / Freight Desk Manager may conduct periodic reviews with the External Compliance Company to ensure alignment with regulatory changes and internal controls.

- Customs Entry Documentation (e.g., U.S. CBP Form 7501 or equivalent in Canada/Mexico)
- Commercial invoice or Pro Forma invoice
- Product brochures, technical information, and manufacturing location data
- Binding customs rulings issued to BLY.
- Binding customs rulings or expert opinion letters relied on by BLY for origin.
- Accounts Payable records and proof of payment, where relevant to valuation or RVC
- USMCA Certifications of Origin (exporter, producer, or importer-based)
- Supplier declarations of origin and costed BOMs, where applicable
- Any correspondence with customs authorities related to USMCA verification, including questionnaires, responses, and final determinations.

Where a customs authority denies preferential treatment based on a verification, the Global Logistics / Freight Desk Manager will retain the complete file and will update the validated parts list to prevent recurrence.

Chapter 6

U.S. ORIGIN GOODS RETURNED PROVISION (9801.00.10)

I. PURPOSE

The purpose of this section is to outline the requirements and procedures BLY must follow when claiming duty-free treatment for U.S.-origin goods returned under subheading 9801.00.10, HTSUS. This provision allows qualifying U.S.-made articles to be re-imported without duty, provided that sufficient evidence of U.S. origin and non-advancement in value or condition is maintained.

II. RESPONSIBILITY

Global Logistics / Freight Desk Manager

- Provides oversight for all 9801.00.10 claims and ensures the Company exercises reasonable care in applying the U.S. Origin Goods Returned Provision.
- Reviews documentation prepared by the customs consultant and confirms that supporting evidence of U.S. origin and non-advancement is complete and compliant.
- Seeks guidance from internal technical, legal, or external experts when required. The customs consultant, under the direction of the Global Logistics / Freight Desk Manager, is responsible for ensuring that the proper documentation is filed and maintained for all claims under the U.S.-Origin Goods Returned Provision.

External Compliance Company (under the direction of the Director of Global Logistics / Freight Desk Manager)

- Obtains, reviews, and maintains all documentation required to support claims under subheading 9801.00.10, including Foreign Shipper's Declarations, Importer's Declarations, and acceptable alternative evidence.
- Ensure the appropriate documents are provided to the customs broker for filing at the time of entry.

Confirms that all records supporting U.S. origin and non-advancement are filed in the Import File and retained in accordance with BLY's Recordkeeping Procedures.

III. REQUIREMENTS

The Company shall apply the U.S. Origin Goods Returned Provision only when sufficient documentation is maintained or a waiver from the documentary requirements is obtained.

III. PROCEDURES

- a) U.S.-origin articles that are re-imported after exportation, without having been advanced in value or improved in condition by any process of manufacture or other means while abroad (for example, defective goods returned to the United States for repair or unused goods returned from customers or affiliates), may be eligible for duty-free treatment pursuant to subheading 9801.00.10, HTSUS. This provision applies to products of the United States, provided that satisfactory evidence of U.S. origin and non-advancement is available at the time of entry.
- b) The Customs Consultant, under the direction of the Director of Global Logistics / Freight Desk Manager, will ensure that appropriate documentation supporting each claim under subheading 9801.00.10 is obtained, reviewed, and retained. For shipments valued over \$2,500 or whenever required by U.S. Customs and Border Protection (CBP), a Foreign Shipper's Declaration, and an Importer's Declaration—or equivalent electronic statements containing the same information—must be provided with the entry summary. When other acceptable proof of U.S. origin (such as manufacturer's affidavits, production or export records, or prior CBP-approved evidence) is available, CBP may waive the formal declaration requirement. In such cases, the customs consultant will ensure that equivalent documentation is maintained in the import file to substantiate the duty-free claim.
- c) In addition to the records maintained in the Import File for each entry (see BLY Recordkeeping Policies and Procedures), the Director of Global Logistics / Freight Desk Manager maintain the following records for each 9801 entry: (1) the Foreign Shipper's Declaration or acceptable equivalent;

(2) the Importer's Declaration or acceptable equivalent; and (3) supporting documentation establishing U.S. origin and confirming that the goods were not advanced in value or improved in condition while abroad.

IV. GOVERNANCE

Records which document 9801 treatment (U.S. origin and re-importation) must be kept for a minimum of five (5) years from the date of entry into the United States. The Recordkeeping chapter in this manual sets forth the general recordkeeping requirements and the specific requirements that apply to entry records on the so-called "(a)(1)(A) list." In addition, the following specific records shall be maintained:

- Purchase Order or Request for Material Transfer
- Documentation showing the goods were exported from the United States
- Binding Customs rulings issued to BLY.
- Binding Customs rulings or expert opinion letters relied on by BLY.
- Required Declarations and Documentation of U.S. Manufacture of Goods

Sample Foreign Shipper's Declaration

I, _____, declare that, to the best of my knowledge and belief, the articles described below were originally exported from the United States from the port of _____ on or about _____, 20, and are now being returned to the United States without having been advanced in value or improved in condition by any process of manufacture or other means while abroad.

Marks	Number	Quantity	Description	Value, in U.S. coin
	-----	-----	-----	-----
	-----	-----	-----	-----
	-----	-----	-----	-----
	-----	-----	-----	-----
	-----	-----	-----	-----
	(Date)			(Signature)
	-----			-----
	(Address)			(Capacity)

(Date)

(Address)

(Signature)

(Capacity/Title)

(This declaration may be submitted electronically or in writing and must be retained by the importer as part of the entry record.)

Sample Importer's Declaration

I, _____, declare that the attached or referenced declaration by the foreign shipper is true and correct to the best of my knowledge and belief. I further declare that the articles described therein were manufactured or produced in the United States by _____ (name of manufacturer), located in _____ (city and state); that the articles were not manufactured or produced under subheading 9813.00.05, HTSUS (temporary importation under bond); and that the articles were exported from the United States without benefit of drawback.

(Date)

(Address)

(Signature)

(Capacity/Title)

(This declaration, or equivalent documentation establishing U.S. origin and non-advancement, must be available at the time of entry and retained for a minimum of five (5) years from the date of importation, as required by 19 CFR § 163.)

Chapter 7

RECORDKEEPING

I. PURPOSE

The purpose of this section is to establish BLY's global recordkeeping standards to ensure compliance with customs laws and regulations in every jurisdiction where the Company operates. Customs authorities require importers, exporters, brokers, and other regulated parties to maintain records that substantiate tariff classification, valuation, country of origin, preferential duty claims, and the exercise of reasonable care. This procedure defines BLY's internal responsibilities, controls, and retention practices while incorporating the binding recordkeeping requirements set by external customs authorities.

II. BACKGROUND

Recordkeeping is a core obligation of customs compliance and is enforced by customs authorities in every jurisdiction where BLY operates. While each country establishes its own statutory retention periods and documentary requirements, all systems share a common expectation: importers and exporters must be able to substantiate the information reported on customs declarations.

Customs agencies routinely rely on these records during audits, verifications, inquiries, and post-entry reviews. Accurate and complete documentation enables agencies to confirm the validity of tariff classifications, valuations, origin claims, and other declarations made at the time of import or export.

Because global recordkeeping obligations vary in scope, format, and retention period, BLY relies on the legal requirements established by external authorities as the governing standards while applying consistent internal controls across all operations. This approach ensures that BLY's documentation not only meets jurisdiction-specific legal obligations but also supports the Company's broader compliance framework and demonstrates the exercise of reasonable care. Customs authorities worldwide require importers, exporters, customs brokers, transporters, and other regulated parties to maintain records supporting the accuracy of declarations made to customs administrations. These records must demonstrate correct tariff classification, valuation, country of origin, preferential treatment claims, and the exercise of reasonable care or due diligence.

III. EXTERNAL AUTHORITATIVE STANDARDS (Click-Reference Framework)

These external sources contain the **official, jurisdiction-specific** recordkeeping rules. BLY incorporates them by reference.

World Customs Organization (WCO) Global Framework

- WCO SAFE Framework of Standards
https://www.wcoomd.org/en/topics/facilitation/instrument-and-tools/frameworks-of-standards/safe_package.aspx
- WCO Data Model & Guidelines
<https://www.wcoomd.org/es-es/topics/facilitation/instrument-and-tools/tools/data-model.aspx>

European Union (EU)

- Union Customs Code (UCC) — Title VIII Recordkeeping
<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02013R0952-20160419>

- EU Implementing Regulation – Recordkeeping & Audit Requirements
<https://eur-lex.europa.eu/homepage.html>

United States

- 19 CFR Part 163 — Recordkeeping (CBP)
<https://www.ecfr.gov/current/title-19/chapter-I/part-163>
- CBP Informed Compliance Publications (ICP)
<https://www.cbp.gov/trade/rulings/informed-compliance-publications>
- Reasonable Care Checklist
<https://www.cbp.gov/document/publications/reasonable-care>

Canada

- CBSA D17-1-21 — Recordkeeping Requirements
<https://www.cbsa-asfc.gc.ca/publications/dm-md/d17/d17-1-21-eng.html>

Australia

- Australian Border Force (ABF) – Import/Export Recordkeeping Rules
<https://www.abf.gov.au/importing-exporting-and-manufacturing/trade-and-goods-compliance>

These sources represent the primary jurisdictions in which BLY operates. Their requirements are binding for shipments into those markets.

IV. DEFINITIONS

Entry Records

Documents or data required by local customs law to support the entry, export, or transshipment of goods.

Records

- Any information created, received, or maintained in the ordinary course of business relating to:
 - Tariff classification
 - Customs valuation
 - Country of origin
 - Preferential trade agreements
 - Transportation or storage of goods
 - Duty and tax calculation
 - Licenses, permits, and certificates.
 - Broker instructions and filings

Records include:

- Declarations, invoices, and transport documents
- Electronic data and system files
- Emails and correspondence
- Accounting and payment records

- Technical data, BOMs, and specifications
- Software required to access or reproduce stored information.

V. RESPONSIBILITY

Global Logistics / Freight Desk Manager

- Maintains the global recordkeeping policy and ensures alignment with external regulatory requirements.
- Ensures all teams understand jurisdiction-specific obligations and internal controls.
- Oversees internal audits, remediation actions, and responses to customs inquiries, audits, and verifications.
- Coordinates with the Legal Department and the External Compliance Company when complex, high-risk, or multi-jurisdictional issues arise.

Business Units / Regional Teams

- Maintain accurate and complete records in local systems to support import, export, valuation, origin, and FTA claims.
- Provide documentation to the External Compliance Company or brokers when required.
- Notify the Freight Desk Team of any system or process changes that may impact documentation or retention.

External Compliance Company

- Maintains Import and Export Files for each declaration cycle and ensures copies are transmitted to BLY per agreed frequency (e.g., biannual).
- Retains classification, valuation, origin, and FTA support documentation in accordance with global legal requirements.
- Supports customs inquiries, post-entry reviews, verifications, and audit responses by providing documentation when requested.
- Alerts the Freight Desk Manager and Legal Department when documentation gaps, inconsistencies, or retention risks are identified.

Customs Brokers

- Maintain entry records, filing data, and supporting documentation in accordance with national customs law and broker-specific retention requirements.
- Provide BLY with required customs entry documentation (e.g., entry summaries, e-filing confirmations, and supporting documents).
- Notify the Freight Desk Team of any discrepancies, missing documents, or issues encountered during customs clearance.
- Provide copies of records promptly when requested by BLY, customs authorities, or the External Compliance Company.

IT / Data Governance

- Ensure systems used for storage (including SharePoint and designated compliance repositories) maintain data integrity, retrievability, and secure retention.
- Preserve archived data and support retrieval during audits or investigations.

Legal Department

- Advises on statutory retention obligations, legal holds, and handling of sensitive or high-risk records.
- Supports cross-border inquiries, enforcement actions, and audits initiated by customs authorities.
- Ensure BLY's recordkeeping practices meet global regulatory expectations.

VI. REQUIREMENTS

BLY must:

1. Maintain complete and accurate records supporting the accuracy of every customs declaration made globally, including classification, valuation, origin, preferential duty claims, licensing, and compliance statements.
2. Demonstrate reasonable care and due diligence in all import and export activities through proper documentation, internal review, and adherence to authoritative customs requirements.
3. Maintain an Import File and/or Export File for each declaration, ensuring all required commercial, logistical, and technical documents are included.
4. Ensure coordinated documentation control across all teams, including the Global Logistics / Freight Desk Manager, Procurement, Sourcing, Engineering, Accounts Payable, IT/Data Governance, Logistics Operators, the External Compliance Company, brokers, and the Legal Department.

This coordination must ensure complete, consistent, and retrievable records for each transaction.

5. Ensure the External Compliance Company and brokers transmit required documentation (e.g., entry packets, classifications, origin support, FTA documentation, licenses) according to agreed retention and delivery schedules.
6. Ensure the Legal Department is consulted when statutory retention obligations, legal holds, or audit risks arise.
7. Produce records promptly upon request by any customs authority, auditor, or authorized government agency.
8. Follow the longest applicable retention period when multiple jurisdictions or rules impose differing timelines.

VII. PROCEDURES

BLY must:

- Maintain complete and accurate records supporting the accuracy of every customs declaration globally, including classification, valuation, origin, preferential duty claims, licensing, and compliance statements.
 - Electronic files are to be obtained from the External Compliance Agency biannually.
 - Records are to be stored on the company's SharePoint server.
 - [\\S-AMUSDAT-ILE02\ALA Documents\ALA Documents - From ALA FTP Site](#)

- Demonstrate reasonable care and due diligence in all import and export activities through proper documentation, internal review, and adherence to authoritative customs requirements.
- Maintain an Import File and/or Export File for each declaration, ensuring all required commercial, logistical, and technical documents are included.
- Ensure coordinated documentation control across all teams, including the Global Logistics / Freight Desk Manager, Procurement, Sourcing, Engineering, Accounts Payable, IT/Data Governance, Logistics Operators, the External Compliance Company, brokers, and the Legal Department.
This coordination must ensure complete, consistent, and retrievable records for each transaction.
- Ensure the External Compliance Company and brokers transmit required documentation (e.g., entry packets, classifications, origin support, FTA documentation, licenses) according to agreed retention and delivery schedules.
- Ensure the Legal Department is consulted when statutory retention obligations, legal holds, or audit risks arise.
- Produce records promptly upon request by any customs authority, auditor, or authorized government agency.
- Follow the longest applicable retention period when multiple jurisdictions or rules impose differing timelines.

VIII. GOVERNANCE

Records which document the importation of merchandise must be kept for a minimum of five (5) years from the date of entry or activity that required the creation of the activity or longer if required by:

- Country-specific customs laws
- Tax authorities
- Parent-company audit policy
- Contractual obligations

Such records include, but are not limited to, the following:

- A. General Customs Entry and Transaction Documentation
 - Purchase Orders or Requests for Material Transfer
 - Customs Entry Documentation (e.g., U.S. CBP Form 7501 or the Canadian/Mexican equivalent)
 - Commercial invoices and/or Pro Forma invoices
 - Packing lists, air waybills, bills of lading, and other transport documents
 - Broker instructions and electronic filing confirmations
 - Shipping, consolidation, and warehousing documentation

- B. Classification, Valuation, and Technical Support
 - Product brochures, technical information, and manufacturing location data
 - Bills of Materials (BOMs), including costed BOMs, where required (e.g., RVC analyses)
 - Binding customs rulings issued to BLY.
 - Binding rulings or expert opinion letters relied upon by BLY for classification, valuation, or origin
 - Accounts Payable records and proofs of payment relevant to valuation or RVC
 - Engineering or supplier-provided specifications and technical descriptions

- C. Origin, FTA, and USMCA Documentation
- Declaration/Statement of Origin and all supporting materials
 - Certificates of Origin or Origin Declarations required under any Free Trade Agreement (FTA)
 - Supplier declarations of origin
 - FTA-specific PSRO analyses, tariff shift reviews, and RVC calculations
 - For USMCA/CUSMA/T-MEC claims specifically:
 - USMCA Certifications of Origin (exporter-, producer-, or importer-based)
 - Supplier USMCA origin declarations
 - Costed BOMs supporting USMCA RVC calculations (where applicable)

- D. Verification, Audit, and Compliance Records
- Any correspondence with customs authorities regarding classification, valuation, origin, or FTA eligibility
 - Verification questionnaires, supplemental document requests, and all responses
 - Producer or supplier questionnaires and supporting exhibits.
 - Final determinations, audit results, or customs decisions
 - Internal review notes, analysis files, and compliance assessments
 - Records demonstrating the Company's exercise of reasonable care.

E. Post-Verification Outcomes and Corrective Actions

Where a customs authority denies preferential treatment or issues an adverse finding following a verification:

- The Global Logistics / Freight Desk Manager must retain the complete verification file, including all correspondence, evidence, analysis, and determinations.
- The Global Logistics / Freight Desk Manager must update the validated parts list, product eligibility status, or internal origin determinations to prevent repeat issues.

F. Drawback-Related Records

If a drawback claim is filed, designated entries and all supporting documentation must be maintained for three (3) years from the date of drawback payment.

G. Priority of Retention Requirements

This record retention policy does not supersede any other policy that imposes a longer or more stringent requirement (e.g., tax laws, financial audit requirements, or legal hold instructions).

Chapter 8

BROKER MANAGEMENT

I. PURPOSE

This section establishes the procedures for selecting, contracting, overseeing, and evaluating customs brokers acting on behalf of BLY. Customs brokers play a critical role in ensuring compliance with global import and export requirements. Proper broker management protects the Company from operational, regulatory, and financial risk.

II. SCOPE

This procedure applies to:

- All customs brokers performing import, export, clearance, filing, or trade-compliance-related work for BLY or Veracio.
- All BLY entities, subsidiaries, and business units.
- Any employee involved in procurement, onboarding, or authorization of a customs broker.

This procedure governs:

- Broker selection and approval
- Contract execution and legal review.
- Scope of work definition
- Broker authority and POA control
- Performance monitoring
- Risk assessments and corrective actions.
- Periodic broker audits

III. RESPONSIBILITIES

Global Logistics / Freight Desk Manager

- Selects, approves, and manages all customs brokers acting on behalf of BLY.
- Defines and communicates the approved scope of work for each broker.
- Oversees contract reviews, renewals, and performance assessments.
- Ensures brokers receive accurate instructions, classifications, and origin determinations.
- Monitors broker filings, accuracy, timeliness, and regulatory compliance.
- Escalates deficiencies to the Legal Department and implements corrective actions.

Legal Department

- Reviews and approves all broker contracts prior to execution.
- Confirms liability terms, indemnification clauses, POA authority, and compliance obligations.
- Provides guidance regarding regulatory requirements, penalties, and enforcement actions.
- Approves issuance of any Power of Attorney (POA) delegating authority to a broker.

External Compliance Company

- Supports broker oversight by reviewing entries, classification usage, origin claims, and import/export filings.
- Identifies compliance gaps or inconsistencies and reports them to the Freight Desk Manager.
- Provides subject-matter expertise for escalation, appeals, post-entry corrections, or customs inquiries.

Business Units / Regional Operations

- Provide accurate commercial and technical data to brokers.
- Notify the Freight Desk Manager when products, suppliers, or processes change.
- Maintain internal controls to prevent unauthorized instructions or communication with brokers.

Customs Brokers

- File customs entries strictly in accordance with BLY instructions, approved classifications, valuations, and origin determinations.
- Notify the Global Logistics / Freight Desk Manager immediately of any document discrepancies, missing information, or regulatory concerns.

- Maintain required documentation and transmit entry packets according to BLY's recordkeeping requirements.
- Perform only the services authorized in their approved scope of work and contract.

IV. REQUIREMENTS

BLY must:

- Engage only approved customs brokers that have been selected, vetted, and authorized by the Global Logistics / Freight Desk Manager with written approval from the Legal Department.
- Execute a formal written contract with each customs broker before any services begin. Contracts must include a defined scope of work, liability protections, indemnification clauses, compliance obligations, and fee structures approved by Legal.
- Ensure a Power of Attorney (POA) is issued only when required by law, approved by the Legal Department, and managed centrally by the Global Logistics / Freight Desk Manager.
- Define and communicate the scope of services for each broker, ensuring that brokers perform only the functions authorized in their contract and no additional services without prior approval.
- Provide brokers with accurate, current master data (classification, valuation, origin, licensing) and ensure brokers do not deviate from Company-approved instructions.
- Ensure ongoing monitoring and periodic auditing of broker performance, including accuracy of entries, classification use, timeliness, document completeness, and regulatory compliance.
- Maintain complete records of contracts, POAs, audit results, corrective actions, and communication in accordance with the Company's global recordkeeping policy.
- Escalate any compliance concerns—including broker errors, repeated discrepancies, or regulatory notices—to the Legal Department and the External Compliance Company for review and corrective action.

V. BROKER SELECTION & APPROVAL PROCESS

The selection of a customs broker must consider:

- Regulatory compliance history
- Industry reputation and certifications
- Geographic and jurisdictional capabilities
- Technical competence
- Ability to support required electronic filing formats.
- Cybersecurity standards
- Financial stability and insurance requirements
- Cost structure

Final approval must be issued by the Global Logistics / Freight Desk Manager with Legal Department concurrence.

VI. CONTRACT & SCOPE OF WORK REQUIREMENTS

Before onboarding any broker, BLY must:

- Execute a written contract reviewed and approved by Legal.
- Ensure a detailed scope of work is included.
- Confirm liability and indemnification clauses.
- Review fee structure and billing terms.
- Document change controls for future modifications.

VII. BROKER PERFORMANCE MONITORING

The Freight Desk Manager must monitor:

- Classification, valuation, and origin accuracy
- Timeliness of filings
- Quality and completeness of entry packets
- Communication and responsiveness
- Error rates and customs hold.

- Compliance with POA and scope requirements
- Alignment with BLY's master data

VIII. BROKER AUDITS

Periodic audits should include:

- Entry file sampling
- Verification of classification usage
- Confirming markings, licenses, and permits
- Review of controls and certifications
- Adherence to BLY instructions
- Verification of correct documentation retention

IX. CORRECTIVE ACTIONS

If deficiencies are identified:

- The Freight Desk Manager notifies the broker in writing.
- The broker provides a corrective action plan.
- Persistent issues are escalated to Legal.
- Broker authority may be suspended or revoked.
- Severe violations may require reporting to customs.

X. GOVERNANCE

- All broker contracts, POAs, audit reports, and performance records must be stored per BLY recordkeeping standards.
- Annual reviews determine whether to renew or terminate services.
- Legal or operational changes may require contract updates.

Chapter 9

INTERNAL CUSTOMS COMPLIANCE REVIEWS

I. PURPOSE

The purpose of this document is to establish the policies and procedures that BLY personnel must follow when conducting internal customs compliance reviews. These reviews ensure ongoing adherence to applicable customs laws, internal policies, and global trade-compliance standards.

II. RESPONSIBILITIES

Director of Global Logistics / Freight Desk Manager

- Conducts the quarterly compliance reviews described above.
- Discuss review results with the Legal Department.
- Ensure that appropriate corrective actions are taken following each review.
- Works with the Legal Department to ensure an internal customs review is conducted by qualified outside experts annually or more frequently when required.

Legal Department

- Reviews the results of quarterly compliance reviews and provides legal guidance where needed.
- Supports the Director of Global Logistics / Freight Desk Manager in determining corrective actions and assessing compliance risks.
- Collaborates jointly with the Director of Global Logistics / Freight Desk Manager to engage qualified external experts for internal customs reviews.
- Ensures corrective actions are legally appropriate and consistent across jurisdictions.
-

Customs Consultant / External Expert

- Performs internal customs reviews as requested by BLY and in accordance with the defined scope and standards.
- Provides formal reports, findings, and recommendations to the Director of Global Logistics / Freight Desk Manager and the Legal Department.
- Supports evaluation of compliance gaps and corrective-action planning.

Internal Audit

- Independently evaluates the design and effectiveness of internal controls related to customs compliance.
- Reviews documentation, processes, corrective actions, and governance practices.
- Provides recommendations to strengthen oversight, consistency, and risk mitigation.
- Coordinates with the Director of Global Logistics / Freight Desk Manager, Legal Department, and Tax Team when findings affect broader compliance obligations.

Tax Team

- Reviews customs compliance findings that may affect transfer pricing, valuation, indirect-tax reporting, or duty-related tax positions.
- Coordinates with Legal and Global Logistics on valuation adjustments, duty corrections, and prior disclosures that may create tax consequences.
- Advises on tax reporting requirements, reserve considerations, and accounting impacts related to customs findings.

III. REQUIREMENTS

- a) Conduct periodic internal reviews of import compliance activities
- b) Ensure that internal customs audits are performed by qualified external experts on a regular basis.

IV. PROCEDURES

- a) At the request of the Legal Department, the Director of Global Logistics / Freight Desk Manager will conduct quarterly reviews of BLY's global import and export activities. Each quarter, the Director of Global Logistics / Freight Desk Managers will select a sample of ten entries - drawn from multiple countries and regions and covering a variety of entry types, goods, suppliers, values, and duty

outcomes. The Director of Global Logistics / Freight Desk Managers will then review each selected entry for compliance in the following areas:

- Tariff Classification
 - Country of origin
 - Valuation
 - Proof of payment
 - Assist and dutiable additions.
 - Preferential duty claims and supporting documentation.
 - Requirements of other government agencies, where applicable
 - Antidumping and countervailing duty applicability
 - Recordkeeping compliance (see Recordkeeping Policies & Procedures)
- b) The results of these quarterly reviews will be provided to the following:
1. Director of Global Logistics / Freight Desk Manager
 2. Legal Department
 3. External Compliance Company (if involved in follow-up)
 4. Tax Tea (only when valuation or duty issues affect tax)
 5. Internal Audit (if engaged)
- c) The Director of Global Logistics / Freight Desk Manager will be responsible for taking any corrective action after discussing the results of the quarterly reviews with the Legal Department. Appropriate corrective action may include, *inter alia*, filing post-entry amendments, prior disclosures, revising the U.S. Customs Compliance Policies & Procedures Manual, etc.
- d) The Director of Global Logistics, after consultation with the Legal Department, may arrange for an internal customs review to be conducted by qualified outside experts on an annual or more frequent basis.
- e) The reviews discussed above will be in addition to any reviews performed by the Internal Audit Department. However, any reviews will address any areas identified by Internal Audit to see if the areas of concern have been addressed.

V. TAX IMPLICATIONS

Customs compliance findings may create financial or tax-reporting consequences that require coordination between Global Logistics, Legal, and the Tax Team. To ensure alignment between customs and tax obligations, the following standards apply:

1. **Coordination With Tax Team**
The Tax Team must be notified of any compliance-review findings that may affect valuation, transfer pricing, duty payments, refunds, or adjustments that could influence tax reporting or financial statements.
2. **Customs Valuation & Transfer Pricing**
Because customs valuation and transfer pricing are governed by separate legal regimes, any change to declared customs value—including post-entry amendments, duty corrections, or pricing adjustments—must be reviewed for:
 - arm's-length implications,
 - consistency with transfer-pricing documentation,
 - year-end true-ups, and
 - whether tax filings require modification.
3. **Duty Payments & Tax Treatment**
Duty increases, refunds, or corrections may affect:
 - COGS (Cost of Goods Sold),

- inventory valuation,
- tax-deductible expenses, and
- taxable income in relevant jurisdictions.

The Tax Team determines required accounting or tax adjustments.

4. VAT/GST/Indirect Tax Considerations

Classification or valuation errors identified through compliance reviews may impact:

- import VAT declarations,
- VAT/GST recoverability,
- excise tax reporting, and
- admissibility of credits.

The Tax Team must assess whether corrections are needed for indirect tax filings.

5. Prior Disclosures & Corrective Filings

If a prior disclosure or other corrective action results in additional duties, taxes, or financial adjustments:

- the Tax Team must be notified immediately,
- Legal ensures consistency in representations to tax and customs authorities, and
- Tax confirms whether amended tax returns or reserve entries are required.

6. Joint Review of Material Findings

Material customs issues identified during quarterly or annual reviews must be jointly evaluated by the Tax Team, Legal Department, the Director of Global Logistics / Freight Desk Manager, and the External Compliance Company to ensure aligned corrective actions and consistent reporting.

VI. GOVERNANCE

Records that document compliance reviews shall be retained for five years. Such records include, but are not limited to:

- Identification of entries pulled.
- Results of the compliance review
- Documentation of corrective action taken
- Documentation of any notifications to Customs or other Federal agencies

Chapter 10

GLOBAL TRADE SANCTIONS, EXPORT CONTROLS & ANTI-BOYCOTT COMPLIANCE

I. PURPOSE

Boart Longyear group companies, including Veracio (the "Company"), operate globally and are therefore subject to a wide range of international sanctions, export-control, and anti-boycott regulations administered by external authorities. The purpose of this section of the Global Customs Import and Export Compliance Procedure ("Procedure") is to ensure that all international transactions comply with these legally binding external requirements.

<https://www.dfat.gov.au/international-relations/security/sanctions><https://ofac.treasury.gov/sanctions-programs-and-country-information><https://ofac.treasury.gov/sanctions-list-search-tool><https://www.bis.gov/regulations/ear><https://www.ecfr.gov/current/title-15/subtitle-B/chapter-VII/subchapter-C/part-738><https://www.sanctionsmap.eu/><https://eur-lex.europa.eu/EN/legal-content/summary/dual-use-export-controls.html><https://main.un.org/securitycouncil/en/content/un-sc-consolidated-list>

II. INTERNATIONAL TRADE SANCTIONS

International sanctions impose restrictions on commercial transactions and may prohibit business with entire countries, specific entities, or designated individuals.

H. Prohibited Countries

As applicable, the Company prohibits all transactions involving countries subject to comprehensive embargoes as published by OFAC (US), DFAT (AU), the EU, and the UN. Employees must rely on the external sanctions lists for current prohibited jurisdictions.

In addition, due to the likely commercial risks, including those related to access to credit facilities and financing, subject to applicable law and regulation, BLY is prohibited from conducting business with the following countries. Please note this list may be updated from time to time at the direction of the divisional CEO.

- Cuba
- Iran
- North Korea
- Syria
- Crimea, Donetsk, and Luhansk region of Ukraine/Russia
- Russia
- Venezuela

B. Restricted Countries & Restricted Parties (SDNs)

Restricted Countries, Restricted Parties and Specially Designated Nationals (SDNs) appear on the following lists, among others. There is not a single global list of sanctioned or restricted countries, entities, or individuals.

- OFAC SDN List
- EU Consolidated List
- UN Sanctions Lists
- DFAT Consolidated List

The Company screens all customer, vendor, and employee records in Oracle or Veracio's applicable system daily using automated tools linked to these external lists. All new third-parties (vendors and customers) onboarded through the NavEx Risk Rate platform also undergo similar screening processes before they are created in Oracle.

The Legal and Compliance team may place a “Legal Hold” designation on an Oracle or Veracio’s applicable system record for a customer, vendor or employee flagged through screening, which indicates that the Company should not conduct any business with the associated party without approval from the Legal Department prior to any engagement or transaction with that party

Some of the lists the Company screens against include critical US government lists including those from the Office of Foreign Assets Control (OFAC), Directorate of Defense Trade Controls (DDTC, Department of State), and Bureau of Industry and Security (BIS); common lists that cover sanctions programs from the US government and international bodies such as the US Treasury Department and The United Nations; and denied and restricted parties and sanctions lists from Europe, Canada, Australia, Japan and other countries. For a comprehensive list of the external lists screened against by the systems and platforms used by the Company, please contact the legal department.

C. Sectoral Sanctions

Sectoral sanctions commonly apply to industries such as finance, energy, and defense, but the scope of restrictions and affected industries may change with little or no advance notice from government.

A copy of the OFAC Sectoral Sanctions Identification (SSI) List can be accessed at <https://ofac.treasury.gov/specially-designated-nationals-and-blocked-persons-list/sectoral-sanctions-identifications-ssi-list>

In the event that a sale to a restricted country/party is requested, the following are required.

- Confirmation that no export license is required.
- Completion of the KYC due diligence process as outlined in the Third-Party Onboarding Standard.
- Review of targeted industries per OFAC and the EU.
- A completed End-User Certificate (EUC) obtained from the potential customer.
- Approval from the Legal Department and the Divisional CEO

End Use Statement (EUS)

EUSs are required for transactions involving high-risk jurisdictions, sectoral sanctions, or when the end user is different than the purchaser, and regardless of these factors, in all cases for transactions involving goods subject to export controls or sanctions restrictions.

An End User Statement is a document that is completed by the purchaser or end user, as applicable, that attests to several key categories of information. First, it confirms both the final (or end) user of the product (who is often different from the purchaser). Second, it confirms where the product will be used (i.e., the specific location and purpose) and attests to the fact that the product is not intended to be transshipped to some alternate destination. Any intermediaries, consignees, or end users disclosed on an EUS must be subject to due diligence screening.

In order to retain a proper record, every End User Statement will be stored in a centralized document repository created by the applicable Business Unit, such as a SharePoint site or folder. Contact your local Customer Service Representative if you are unsure of the location of the repository or the process for retaining these documents.

A standard End User Statement is provided under Annex A to this Procedure.

Note: If, when asked, a customer or purchasing agent is reluctant or refuses to sign an End User Statement, this fact alone should be considered a serious Red Flag and should be immediately reported to the Legal Department.

Exports of goods subject to export control or sanctions restrictions are not permitted without an EUS.

III. External Authoritative Sources for Lists and Information about Trade Sanctions, Prohibited Countries, Restricted Countries, and Restricted Parties

Australia Department of Foreign Affairs and Trade (DFAT): Australian Sanctions Office

This site provides resources and information about Australia sanctions, including a consolidated sanctions list of all individuals, entities, and vessels subject to Australia sanctions.
<https://www.dfat.gov.au/international-relations/security/sanctions>

United States Office of Foreign Asset Control (OFAC): Sanctions Programs
This site provides an explanation of active sanctions programs and country information.
<https://ofac.treasury.gov/sanctions-programs-and-country-information>

US Sanctions List Search Tool
This site allows you to search OFAC sanctions lists for individuals, entities and groups targeted by US sanctions.
<https://ofac.treasury.gov/sanctions-list-search-tool>

United States Bureau of Industry and Security (BIS): Export Administration Regulations (EAR)
This site provides interactive tools to search for and filter Export Control Classification Numbers, filter the destination you plan to export to and review the Reasons for Control, and see which country groups your selected destination(s) fall under.
<https://www.bis.gov/regulations/ear>

US Commerce Control List (CCL)
This site provides an overview list of items subject to export control.
<https://www.ecfr.gov/current/title-15/subtitle-B/chapter-VII/subchapter-C/part-738>

European Union: EU Sanctions Map
This site provides a list of contacts for National Competent Authorities and the European Commission, a Consolidated List of Financial Sanctions, a link to the EU sanctions helpdesk, a Consolidated list of Travel Bans, a Consolidated List of designated vessels, a database of Taxation and Customs Union (TARIC) information searchable by goods code and origin/destination, an EU sanctions tracker and a Whistleblower tool to report violations of EU sanctions.
<https://www.sanctionsmap.eu/#/main>

EU Dual-Use Regulation
This site provides a summary of the EU regulations for dual-use export controls.
<https://eur-lex.europa.eu/EN/legal-content/summary/dual-use-export-controls.html#:~:text=improving%20EUR%2DLex%20?-.Dual%2Duse%20export%20controls,These%20include:>

Global Affairs Canada: Canadian sanctions
This site provides resources and information about Canada sanctions, including a non-authoritative consolidated sanctions list of all individuals, entities, and vessels subject to Canada sanctions.
https://www.international.gc.ca/world-monde/international_relations-relations_internationales/sanctions/index.aspx?lang=eng

Canada Export Controls
This site provides a summary of Canadian export controls, including those applicable to dual-use goods. It includes links to relevant Canadian policies and guides, including the Export and Brokering Controls Handbook (reference tool regarding the administration of Canadian export controls), and A Guide to Canada's Export Controls (detailed list of goods subject to export controls)
https://www.international.gc.ca/controls-controles/about-a_propos/expor/before-avant.aspx?lang=eng

United Nations: Security Council Sanctions
This site provides a downloadable consolidated list of all individuals and entities subject to measures imposed by the UN Security Council.
<https://main.un.org/securitycouncil/en/content/un-sc-consolidated-list>

IV. EXPORT CONTROLS & PROHIBITED END USES

Exports of goods, software, technology, and information may require special authorization depending on the destination, end user, and technical characteristics.

Authoritative sources to determine whether such authorization is required include:

- U.S. EAR & CCL <https://www.bis.gov/>
- DFAT Defense and Strategic Goods List <https://www.defence.gov.au/business-industry/exporting/export-controls-framework/defence-strategic-goods-list>
- EU Dual-Use Regulation <https://eur-lex.europa.eu/EN/legal-content/summary/dual-use-export-controls.html#:~:text=improving%20EUR%2DLex%20?-.Dual%2Duse%20export%20controls,These%20include:>

Prohibited End Uses

Company products must not be supplied for:

- Military applications
- Nuclear weapons programs
- Missile technology programs
- Chemical/biological weapons
- Ballistic weapons systems

If any prohibited end use is suspected, employees must stop and notify Legal Department immediately.

IV. KNOW YOUR CUSTOMER (KYC)

KYC" is a process used to verify a customer's identity and assess the potential risks of a business relationship. It includes performing due diligence such as collecting and verifying documents and information and conducting sanctions and adverse media screenings. Please refer to the Third-Party Onboarding Standard for the specific KYC activities required by the Company.

V. ANTI-BOYCOTT COMPLIANCE

Employees must not agree to participate in any boycott that would violate applicable laws or regulations. Any such request must be reported immediately to the Legal Department, and employees must retain all related written or oral communications, directives, or other relevant information.

VI. GOVERNANCE

Records must comply with applicable laws and rules related to recordkeeping, including:

- U.S. EAR & CCL
- DFAT recordkeeping rules
- EU Dual-Use Regulation Recordkeeping Requirements
- Exporters' and Producers' Records Regulations (Canada)
- Customs Act (Canada)
- Records must be stored in Oracle or other approved systems.

Annex A: End User Statement

Global Trade Compliance and Export Controls Laws require that Boart Longyear obtains the following information. Please note that this document **must be completed by the final user** of the goods and be completed on their **company letterhead**. This document **cannot** be completed by the exporter, an intermediate consignee, a broker/freight forwarder or their agents. The parties identified in this End Use Statement should be subject to due diligence screening and research before proceeding with any export.

Date:

[Applicable Agency/Unit]

Transaction Reference:		
PO Number:		Date:
Vendor:		
Purchaser Name & Address:		
Name:		
Address:		
City:	State/Province:	
Country:	Postal Code:	
Website:		
Contact Person:	Email:	
Phone Number:	Fax Number:	
I certify that, with respect to the products exported from [Country] as listed in this form:		
<input type="checkbox"/> I am the final consignee and end user of the Products;		
- or -		
<input type="checkbox"/> I am an intermediary, and the final consignee and end user of the Products is:		
End User / Ultimate Consignee (if different from above):		
Name:		
Address:		
City:	State/Province:	
Country:	Postal Code:	
Website:		
Contact Person:	Email:	
Phone Number:	Fax Number:	
Details of Products to be Supplied (the "Products"):		
Product Name & Description:	Part Number (if applicable):	Quantity:

Description of End User's Business:

The end use of the Products will be (select all that apply):

Commercial/Industrial end-use Military end use Other (please specify):

Detailed Description of End Use:

Country (or countries) of Final Destination:

Certifications:

1. I certify that:
 - (a) I will not resell, retransfer, or reexport the Products or any related goods, services, or technology to any location, end-user, consignee or party other than as described in this form.
 - (b) The Products and any related goods, services, or technology will not be used for nuclear or missile proliferation activity or in the design of chemical or biological weapons, and they will not be resold or exported, directly or indirectly, to any individual or entity involved in such activity.
 - (c) The Products will not be transshipped to other destinations or otherwise diverted from what has been described in this form.
2. I will promptly notify the vendor of any changes to the information contained in this form.
3. **I am familiar with the transaction described in this form and I am authorized to provide this certification to vendor on behalf of myself and/or my company (as applicable). To the best of my knowledge, all information in this document is complete and correct.**

Signature:	Date:
Name:	
Title:	
Company:	

Authorized Representative

DOCUMENT ADMINISTRATION AND REVISION HISTORY

APPROVED by	Divisional CEOs 12 December 2025	
OWNED by	CEO DS CEO DP CEO Veracio	Denis Despres Ermanno Simonutti Annelie Lundstrom
ADMINISTRATED by	Global Logistics Director – DP (and interim DS) Director of Product and Operations – Veracio	Eric Barnett Adam Tomaszewski
REVIEWED by	VP Legal and General Counsel, DP	Nick Nash
	IP & Compliance Manager - DP	Amy Cottle
	Global Director Audit & Risk Services - DS	Ty Barnes

Revision	Date	Comments
001		
002		