



WHISTLEBLOWER POLICY

Badger team members, including directors, officers, and employees are responsible for making good faith reports of actual or suspected wrongdoing, including breaches of our Code of Conduct, our other policies and procedures (including, but not limited to, accounting, internal accounting controls, and auditing practices), and applicable laws. This policy is intended to provide a process for Badger team members, as well as other stakeholders, to make such reports, confidentially and anonymously if preferred and without fear of retaliation, and to confirm Badger's commitment to investigate such reports appropriately.

Incidents of wrongdoing must be reported promptly to someone who can address the matter. For Badger team members, incidents should be reported to the team member's direct supervisor or next level manager. If a Badger team member believes it would be inappropriate to report an incident to a supervisor or next-level manager, the team member may report the incident to any of Badger's senior management or, alternatively, if the Badger team member prefers to report the incident anonymously, they can do so through *ConfidenceLine*, an external service provider engaged by Badger specifically for this purpose, at <http://www.badgerinc.confidenceline.net/> or by calling toll free at 1.800.661.9675. *ConfidenceLine* allows for reporting to be done 24/7 in English, French, or Spanish through a call center or online, and is also available to external stakeholders. While anonymous reporting is possible and protected, anonymous reports are more difficult to properly investigate and resolve; therefore, Badger encourages anonymous reporting only where necessary. It is possible the identity of an anonymous reporter becomes known during the investigation process or subject to legal disclosure requirements.

All incident reports will be treated and kept as confidential to the extent permissible by law and feasible to permit proper investigation and resolution. Reports will only be accessible to individuals determined to have a "need to know" and where such access will not otherwise compromise or interfere with the independence, effectiveness, and integrity of the investigation. Badger's Vice President, Legal (legal@badgerinc.com) is the designate responsible for overseeing the administration of this policy, including the receipt, retention, and treatment of incident reports submitted through the *ConfidenceLine*, and for related communications with the Audit Committee of the Board of Directors of Badger Infrastructure Solutions Ltd. Reports of wrongdoing by Badger's Vice President,

Legal submitted through the *ConfidenceLine* will be directed to the Chair of the Audit Committee, or can be submitted directly to the Chair of the Audit Committee by mail at the following address:

Badger Infrastructure Solutions Ltd.
#3100, 525 – 8th Avenue SW
Calgary, Alberta, Canada T2P 1G1

Attention: Chair of the Audit Committee of the Board of Directors

Badger will not permit any form of retaliation or reprisal (including discharge, demotion, transfer, suspension, threat, intimidation, harassment, or any other form of discrimination) by any person or group, directly or indirectly, against anyone who truthfully and in good faith makes a report as provided for under this policy, or against anyone involved in the investigation of such a report. Notwithstanding the foregoing, a Badger team member who reports an incident of wrongdoing which they were involved in may be appropriately disciplined for their involvement. Any Badger team member involved in retaliation or reprisal in violation of this policy could face disciplinary action, up to and including termination of the team member's employment or engagement or being reported to the authorities.

ConfidenceLine™ FAQ

How can I access ConfidenceLine™?

You can access ConfidenceLine™ any time by calling 1-800-661-9675 or by visiting the online portal at <http://www.badgerinc.confidenceline.net/>

Why has Badger introduced this hotline?

ConfidenceLine™ provides anonymous ethics reporting for employees and allows for reporting to be done either through a fully manned call center or online.

Why has Badger gone to a third party to provide this service?

By using a third-party, confidentiality is assured as well as insuring accessibility across the organization. In addition, the third-party hotline is available 24/7, 365 days a year, for incoming calls and web reports. Reporting can be done in a variety of languages, including French and Spanish.

Why was ConfidenceLine™ chosen as the provider of this hotline service?

The ConfidenceLine™ program has provided anonymous ethics reporting services since 1992. They are considered both the pioneer and leader of ethics reporting.

Who owns ConfidenceLine™?

ConfidenceLine™ is owned by Xpera, a Human Resources services company. They are Canada's premier national provider of Risk Mitigation & Investigation Services.

How secure is the information gathered by ConfidenceLine™?

ConfidenceLine™ recognizes the importance of ensuring the anonymity of the reporting party for safe disclosure purposes. The reporting party is not required to provide their name or contact information. All report information and data that is received by ConfidenceLine™ is stored and saved in a secure facility on secured servers within Canada.

Who can make reports through ConfidenceLine™?

The ConfidenceLine™ service is open to all Badger team members and stakeholders.

What can I report through established channels or, if that is not possible, through ConfidenceLine™?

The majority of things that occur day to day are to be reported through normal channels (supervisor or next level manager, or to senior management).

Events that might trigger the use of ConfidenceLine™ can cover various types of misconduct. Some examples are:

- unlawful acts, whether civil or criminal;
- breaches of Badger's Code of Conduct;
- breaches of or failures to implement or comply with any Badger policy;
- unprofessional conduct or conduct that is below recognized and established standards of practice;
- questionable accounting or auditing practices;
- dangerous practices likely to cause physical harm or damage to any person/property;
- failure to rectify or take reasonable steps to report a matter likely to give rise to a significant and avoidable cost or loss to Badger;
- abuse of power or authority for any unauthorized or ulterior purpose; and
- unfair discrimination in the course of employment or provision of services.

How is my anonymity preserved when I use ConfidenceLine™?

Absolutely no personal or identifying information will be shared with Badger unless you specifically request that you wish to disclose this information. The report and other supplied documents will be reviewed by a ConfidenceLine™ Administrator to screen out any personal information before sending the report to a Badger Designate to view.

How are reports handled through ConfidenceLine™?

After you submit a report, a ConfidenceLine™ team member will review the report in order to screen out any identifying information. Once this screening has been completed, the Badger Designate will be notified about the report, at which point they will be able to view and respond to the report. You are able to view or hear the response by calling the toll-free phone line or by logging into your account online. If you wish to reply to the message, you will be able to do that at this point as well. Ensure that you have your anonymous ID number if you are calling the hotline, or your assigned username and password if you are logging back into the website.

What should I expect when I make a report using the toll-free ConfidenceLine™ phone line at 1-800-661-9675?

An experienced ConfidenceLine™ Call Agent will be available 24/7 to assist you. They will be able to document your report anonymously. Once the call has been finished, you will be provided with an ID number and a request to call back after 3-5 business days to receive an initial response to the report from Badger. Please note that ConfidenceLine™ will screen out any potential identifying information, unless you request to be identified. An e-mail notification will be sent to the Badger designate, who will then view and respond to the report.

What happens when I make a report using the online ConfidenceLine™ option?

The E-Web Reporting system allows you to anonymously log on to ConfidenceLine™ from a secure website. Once you have submitted the report online, the report will be viewed first by a ConfidenceLine™ Administrator and then is sent over to the Badger Designate. Using your assigned username and password to log back into the website will allow you to view responses from the Badger Designate and you will also be able to communicate with them.

What if I'm the person who is the subject of an investigation?

Keep in mind that the decision to conduct an investigation is not an accusation – it is a neutral fact-finding process. You will be given opportunities for input during the investigation and you will be given an opportunity to respond to materials points of evidence in the investigation report unless there are compelling reason not to do so.