

RANCO

INCLUSION AND DIVERSITY AND ANTI-HARASSMENT POLICY

At RANCO we benefit greatly from the skills, experience and commitment of the diverse range of people who work with us. We recognize that diversity is essential to us being able to best serve our customers and strive to ensure that no one is treated inappropriately or disrespectfully at our workplace. This is aligned with our values to act with integrity and care for our people.

This policy sets out our approach to inclusion and diversity and anti-harassment, and the avoidance of discrimination at work.

Inclusion and diversity for the purposes of this policy means the creation of a respectful work environment in which people neither discriminate nor are discriminated against in any context on the basis of the following characteristics:

- 1) age;
- 2) disability;
- 3) gender or gender reassignment;
- 4) sex or sexual orientation;
- 5) marital or civil partnership status;
- 6) family status including pregnancy, maternity, paternity or other carer status;
- 7) race including ethnic origin, nationality or color;
- 8) religious, political or other beliefs;
- 9) full-time or part-time status; and

10) any other characteristic in respect of which legal protection is afforded by local law.

Discrimination for these purposes includes one of the above characteristics being a factor in someone not being treated as favourably as they would otherwise have been treated, even if that characteristic was not the only or the main factor related to the treatment. RANCO takes a zero-tolerance approach to any form of discrimination.

Harassment includes any disrespectful actions or statements related to the above characteristics or any other form of behavior that does not involve being treated with respect and dignity. It includes any verbal or physical conduct designed to threaten, intimidate or coerce, or verbal taunting that, in the employee's opinion, impairs his or her ability to perform his or her job. This applies in the workplace, outside the workplace (when dealing with customers, suppliers or other work-related contacts, and on work-related trips or events including social events).

Sexual harassment in any form is prohibited under this policy. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favours, and other verbal or physical conduct of a sexual nature when submission to or rejection of such conduct is used as the basis for employment decisions, or when such conduct has the purpose or effect of creating an intimidating, hostile, or offensive working environment.

APPLICATION

This policy applies to all people who work for us (including our employees, contractors, consultants, advisors, temporary workers and agency workers) and applies throughout the course of their dealings with us, including when they apply to work for us and after they cease working for us. It covers all aspects of employment with us, including recruitment, pay and conditions, training, appraisal, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment. The policy creates both rights to be enjoyed by people who work for us and responsibilities for those same people to behave in a similar manner to ensure that others enjoy those same rights. Leaders and managers within our business should assume particular responsibility to give effect to inclusion and diversity and anti-harassment, and robustly and promptly address any conduct that breaches this policy of which they become aware.

ASSISTANCE

We provide assistance to all people who work for us to comply with this policy including, where appropriate, training, guidance and support from Human Resources.

COMPLAINTS

Incidents of non-compliance with this policy or of any other conduct that affects inclusivity and diversity should ordinarily be reported to site managers in the first instance. Such incidents may alternatively be reported to Human Resources at our central office (Statesboro, GA- Pam Averitt or Andy Tomlin). We are committed to dealing promptly and thoroughly (and with as much confidentiality and sensitivity as is possible) with any such complaints.

We do not tolerate any form of victimization relating to any complaint made in good faith. Victimization includes not only conduct directed at the complainant but also conduct directed at any other person involved in any related investigation.

SANCTIONS

We may commence disciplinary or other applicable proceedings under our Code of Business Conduct against any person who we consider may have breached this policy. Such proceedings may lead to the imposition of appropriate disciplinary sanctions up to and including dismissal.

POLICY STATUS

We reserve the right to review and amend this policy from time to time to ensure that we are adequately promoting inclusion and diversity and anti-harassment.

QUESTIONS, COMMENTS, AND CONCERNS may be directed to paveritt@therancogroup.com or atomlin@rancoreponse.com