DISCRIMINATORY HARASSMENT

Sunbelt is committed to maintaining a work environment that is free of discrimination. In keeping with this commitment, we will not tolerate harassment of Sunbelt’s employees by anyone, including managers, co-workers, vendors, clients, customers or other regular visitors of Sunbelt. Further, Sunbelt employees are prohibited from engaging in the harassment of coworkers, vendors, clients, customers and regular visitors of Sunbelt. All employees are mandated to report any behaviors or conduct that may be in violation of this policy directly to the Human Resources Department immediately.

Harassment consists of unwelcome conduct, whether verbal, physical or visual, that is based upon a person’s protected status, such as their sex, color, race, religion, national origin, age, disability or other legally protected group. Sunbelt will not tolerate harassing conduct that affects tangible job benefits, that interferes unreasonably with an individual’s work performance or that creates an intimidating, hostile or offensive working environment. Harassing conduct forbidden by this policy specifically includes, but is not limited to:

- Epithets, slurs, jokes, stereotyping, use of offensive or inappropriate nick-names or intimidating acts that are based on a person’s protected status;
- Written or graphic material circulated within or posted within the workplace that shows hostility toward a person because of his or her protected status;
- Verbal, written or implied threats of coercion; or
- Use of one’s position to intimidate or to pressure a subordinate.

All such behaviors are expressly prohibited by this policy and violations may result in progressive disciplinary action up to and including discharge.

Further, Sunbelt does not discriminate against individuals who are disabled. Sunbelt is committed to complying with the requirements of the Americans with Disabilities Act, as amended, (ADA), as well as other applicable state specific statutes and will make every effort to facilitate reasonable accommodations for qualified persons. Employees seeking such accommodations should speak with their Manager or contact the Human Resources Department toll-free at 1-866-573-6246 for guidance.

An employee’s medical condition is private and confidential. Failure to maintain such confidentiality may be grounds for disciplinary action. Further, employees who feel that they have been discriminated against as a result of their disability, or witness such harassment of a coworker, should contact the Human Resources Department immediately.

SEXUAL HARASSMENT

Sunbelt expressly forbids sexual harassment and all employees are mandated to report any behaviors or conduct that may be in violation of this policy directly to the Human Resources Department immediately. Sexual harassment consists of unwelcome sexual advances, request for sexual favors and other physical, verbal or visual conduct based on sex when:

- Submission to the conduct is an explicit or implicit term or condition of employment; or
- Submission to or rejection of the conduct is used as the basis for an employee’s work performance or creating an intimidating, hostile or offensive working environment.

Examples of conduct toward employees of the same or opposite sex that may constitute sexual harassment include, but are not limited to, the following:

- Explicit demands for sexual favors;
- Sex-oriented verbal or written kidding, teasing or jokes;
- Repeated sexual flirtations, advances or propositions;
- Continued or repeated verbal abuse of a sexual nature;
- Graphic or degrading comments about an employee or his or her appearance, demeanor or sexual orientation;
- The display of sexually suggestive objects or pictures;
- Sexual gestures or grabbing/touching oneself in a sexual manner;
- Subtle pressure for sexual activity; or
- Deliberate physical contact such as patting, hugging, pinching or brushing against another’s body.

All such behaviors are expressly prohibited by this policy and violations may result in disciplinary action up to and including discharge.

WORKPLACE BULLYING

In some instances, coworkers may engage in behavior that while not necessarily based on a person’s protected status or fits into the prohibited behavior above, is nonetheless hostile. Although it is inevitable that personality conflicts will arise from time to time, some such behavior may develop into workplace bullying. Workplace bullying is defined as the repeated, health-harming mistreatment of one or more persons (the targets) by one or more perpetrators that takes one or more of the following forms:

- Verbal abuse;
- Offensive conduct/behaviors (including nonverbal) that are threatening, humiliating or intimidating; and/or
- Work interference, including sabotage, that prevents work from getting done;

AND:

- Is driven by perpetrators' need to control the targeted individual(s);
- Is initiated by bullies who choose targets, timing, place and methods;
- Escalates to involve others who side with the bully, either voluntarily or through coercion; and,
- Undermines legitimate business interests when bullies' personal agendas take precedence over work itself.

Sunbelt is committed to providing a workplace that is free from such bullying and encourages any employees who feel as though they are the victim of such conduct, or who have witnessed such behavior, to contact the Human Resources Department using the toll-free HR Hotline by calling 1-866-573-6246.

WORKPLACE VIOLENCE

Sunbelt is committed to providing a safe, violence-free workplace and strictly prohibits employees, vendors, consultants, customers, visitors, or anyone else on Company premises or engaging in a Company-related activity from behaving in a violent or threatening manner. Workplace violence includes:

- Threats of any kind;
- Threatening, physically aggressive, or violent behavior;
- Other behavior that suggests a propensity toward violence, including belligerent speech, excessive arguing or swearing, sabotage, or threats of sabotage to Sunbelt property, or a refusal to follow Company policies and procedures;
- Defacing Sunbelt property or causing damage to Sunbelt facilities;
- Having weapons of any kind, regardless of permit, including but not limited to firearms or other dangerous weapons (including but not limited to all firearms, explosives, air guns, air rifles, BB guns, paint guns, tasers, non-utility knives and switchblades) on or in Sunbelt property (unless there is a specific state or local law beyond simple licensure allowing an employee to bring their gun to work), or while conducting Company business, and/or
- Deliberately pouring, splashing, dousing or spraying any type of potentially harmful chemical, liquid or substance on or toward another individual.

It should be noted that the Federal Motor Carrier Safety Administration (FMCSA) expressly prohibits “DOT-Regulated” employees from carrying weapons, regardless of concealed/carry permit.

If an employee observes or becomes aware of any violent action or behavior by any person affiliated with Sunbelt’s business interests, they should immediately notify their Manager. Further, employees should notify their Manager if they are involved in a situation where a restraining order is in effect, or if a potentially violent non-work related situation exists that could result in workplace violence.

All reports of workplace violence will be taken seriously and will be promptly and thoroughly investigated. If Sunbelt determines that workplace violence has occurred, the Company will impose disciplinary action on the offender(s), up to and including discharge.

To fulfill Sunbelt’s responsibility of providing a safe environment for its employees and customers, weapons are strictly prohibited on or in Sunbelt property unless specifically allowed by state law. The Company’s policy applies to both customers and employees. If an employee sees anyone bring a weapon on to Sunbelt property, or if they suspect someone of doing so, they should notify their Manager immediately.

REPORTING HARASSMENT

All Sunbelt employees are responsible to help ensure that we avoid harassment. All employees are required to report any instances of potential violations of Sunbelt’s harassment policies to the Human Resources Department. Any team member who feels that they have experienced or witnessed harassment should immediately notify a Manager or a Human Resources Representative. The Human Resources Department can be contacted toll-free by calling 1-866-573-6246. Sunbelt forbids retaliation against anyone for reporting harassment, assisting in making a harassment complaint or cooperating in a harassment investigation. Sunbelt will preserve confidentiality to the extent the needs of the investigation permit. Employees should also notify the Human Resources Department if any attempt to circumvent such an investigation occurs.

Sunbelt’s policy is to investigate all such complaints thoroughly and promptly. If an investigation confirms that a violation of this harassment policy has occurred, Sunbelt will take corrective action up to and including immediate discharge, when appropriate. Additionally, when investigating complaints of harassment under this policy, Sunbelt may impose discipline up to and including discharge for inappropriate conduct that comes to Sunbelt’s attention, without regard to whether the conduct constitutes a violation of this policy.

WHISTLEBLOWER POLICY

Sunbelt is committed to the highest possible standards of ethical, moral and legal business conduct. In line with this commitment and Sunbelt’s commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and reassurance that they will be protected from reprisals or victimization for whistleblowing in good faith.

The whistleblowing policy is intended to cover serious concerns that could have a large impact on Sunbelt, such as actions that may lead to incorrect financial reporting, are unlawful, do not conform to Company policy or otherwise amount to serious improper conduct.

Harassment or victimization of the complainant will not be tolerated and every effort will be made to protect the complainant’s identity as far as constraints of the investigation allow. Although anonymous allegations will be taken, Sunbelt encourages employees to put their names to allegations because appropriate follow-up questions and the
subsequent investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be investigated, but consideration will be given to:

- The seriousness of the issue raised;
- The credibility of the concern; and,
- The likelihood of confirming the allegation from attributable sources.

The whistleblowing procedure is intended to be used for serious and sensitive issues. Malicious allegations may result in disciplinary action. Serious concerns relating to financial reporting and unethical or illegal conduct should be reported in any of the following ways:

- Directly to the employee’s immediate Supervisor, Manager, a Human Resources Representative or any Vice President of the Company;
- Through the toll-free HR Hotline by calling 1-866-573-6246; or
- By mail to: Sunbelt Rentals Human Resources Department at 1646 West Highway 160; Suite 8162; Fort Mill, South Carolina 29708-8010.

Callers to the HR Hotline will have the ability to remain anonymous if they so choose; however, calls to the HR Department may be forwarded to other departments (e.g., Accounting, Performance Standards, Safety, etc.), as required by the scope of the investigation. The earlier a concern is expressed, the easier it is to take action; therefore, prompt reporting is essential to the success of this policy.

Whether reported to Sunbelt personnel or through the HR Hotline, the complainant will be given the opportunity to receive follow-up on their concern in a timely fashion. Due to confidentiality issues, at times, the information offered to the complainant will need to be limited. Beyond such constraints, the response will contain an acknowledgement that the concern was received and a brief overview of how the matter will be dealt with, as well as an indication of whether or not further investigation will follow. The amount of contact between the complainant and the department/person(s) investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from the complainant. Sunbelt forbids retaliation, discharge, demotion, suspension, threats, harassment or any other type of discrimination against any employee for making a complaint, assisting in making a complaint, or participating in an investigation stemming from a complaint. Employment-related concerns should continue to be reported via the Grievance Policy described below.

GRIEVANCE POLICY

It is Sunbelt’s intention to provide an effective way for employees to bring problems concerning their well-being at work to the attention of Sunbelt’s management; therefore, a grievance procedure has been established for the benefit and use of Sunbelt’s employees. Sunbelt takes all complaints seriously and is committed to resolving such matters in a fair and timely fashion. Anonymous grievances are discouraged because there is no one to request clarification from or report the results of an investigation to.

Misunderstandings or conflicts can arise in any organization and should be resolved before serious problems develop. Most incidents resolve themselves in due course. When an employee believes a work condition or treatment is unjust, inequitable, a hindrance to effective operation or creates a problem, he or she is encouraged to follow the procedure detailed below:

(A) Discussion of the problem with the immediate Supervisor/Manager is encouraged as a first step. If the employee does not believe a discussion with the Supervisor/Manager is appropriate, the employee should proceed directly to Step B.
(B) If the problem is not resolved after discussion with the Supervisor/Manager or if the employee thinks a discussion with the Supervisor/Manager is inappropriate, the employee is then encouraged to request a meeting or discussion with their District Manager or a Human Resources Representative. In the event the District Manager is the subject of the grievance, the Regional or Senior Vice President should be contacted. They will conduct an investigation and consider the facts and may review the matter with and involve the Human Resources Department as appropriate. Any discussions will be kept confidential to the maximum extent possible.* The employee will receive a timely response regarding the problem after speaking with the District Manager (or Vice President or the Human Resources Representative).

(C) If the employee is unsatisfied with a decision and wishes to pursue the matter further, he or she may prepare a written summary of the concerns and request that the Vice President of Human Resources, the Executive Vice President of Administration & Business Development, or the Chief Executive Officer review the matter. This request should be made through the Human Resources Department, who will notify the appropriate person. After a review of the facts (which may include, but is not limited to, the employee’s written summary of the problem, interviews with the people involved and further investigation if necessary), the Sunbelt Representative will inform the employee of its decision. The decision of the Sunbelt Representative will be final.

(D) Sunbelt prohibits any form of retaliation against any employee for filing a bona fide complaint under this or any of its policies or for participating in the complaint investigation. However, if after investigating any complaint, Sunbelt determines that an employee intentionally provided false information regarding the complaint or during the investigation process, disciplinary action may be taken against the employee providing the false information. Further, Sunbelt may take disciplinary action for inappropriate conduct that comes to Sunbelt’s attention during an investigation, without regard as to whether or not the conduct was the specific focus of the initial grievance.

*As it pertains to confidentiality, as mentioned, Sunbelt will keep any complaints as confidential as possible. Sunbelt respects every employee’s right to discuss such matters with anyone in any forum or venue he or she feels fit. Nonetheless, Sunbelt does respectfully ask that individuals making complaints consider returning the same courtesy of confidentiality in so much as it is required to maintain the integrity of any resulting investigation.