

Equal Opportunity And Affirmative Action

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Background And Definition

RigNet has always been committed to the principle of equal employment opportunity. Over the years, our employment policies and practices have remained consistent with the clear intent of Congress to prevent discrimination and provide equal employment opportunities to all individuals, as reflected in Congress' enactment of the Civil Rights Act of 1964, the Age Discrimination in Employment Act in 1967, the Rehabilitation Act of 1973, the Vietnam Era Veterans Readjustment Assistance Act of 1974, and the Americans with Disabilities Act of 1990, and as amended.

Policy

It is the policy of RigNet, Inc. ("RigNet") to employ qualified persons without discrimination against any employee or applicant for employment because of race, color, gender, religion, national origin, disability, veteran status, military status, age, marital status, gender identity, sexual orientation, genetic information or any other protected group status and further, to take affirmative action to employ and advance in employment qualified minorities, women, individuals with disabilities, disabled veterans, recently separated veterans, active duty wartime or campaign badge veterans or Armed Forces service medal veterans.

Part of RigNet's Affirmative Action Program is to implement its Equal Employment Opportunity ("EEO") policy, which reflects RigNet's commitment to prohibiting discrimination. The EEO policy states that RigNet will recruit and hire employees without regard to race, color, religion, religious grooming practice, religious dress practice, pregnancy, sex (including perceived pregnancy, pregnancy, childbirth or related medical condition and breastfeeding), sexual orientation, gender identity or perceived sex or gender, gender expression, genetic information or characteristics (with respect to the applicant, employee, or a family member), national origin, ancestry, age, physical or mental disability, legally protected medical condition as defined under State law, marital status, domestic partner status,

family care status, military caregiver status, veteran status, uniformed service, or other protected classification under federal, state, or local law.

RigNet has taken the following steps to accomplish that goal:

- a. The EEO policy is included in the RigNet Employee Handbook and is posted in a central location at all company U.S. facilities.
- b. All managers are informed of the intent of the EEO policy, and their individual responsibility for its implementation. categories;
- c. All new employees are informed of the EEO policy at the time of orientation.
- d. RigNet will include the EEO policy in all subcontractor and vendor agreements. Employment agencies and search firms will be notified of RigNet's EEO policy when engaged to solicit candidates for job openings. Human Resources will include contacting minority and female organizations, workers with disabilities organizations and veteran organizations for submission of referrals when job openings occur.
- e. All advertisements carry the EEO clause: Equal Opportunity Employer
- f. Job vacancies will be posted on the company website.

RigNet also prohibits any employee from harassing another on the basis of any of the foregoing protected categories. Prohibited harassment includes unwelcome verbal, visual or physical conduct that is based on an individual's protected category and interferes with an employee's work performance or creates a hostile work environment, such as ethnic or racial slurs or sexual advances.

Responsibility

It is the responsibility of each supervisor in a position involving employment decisions to ensure unconditional compliance with the EEO policy.

Human Resources is responsible for implementing the Affirmative Action Program to ensure that applicants and

employees are not discriminated against including but not limited to decisions affecting recruitment, placement and assignment, compensation, selection for training, promotion and termination.

Program Implementation

Human Resources will be responsible for implementation of the Affirmative Action Program. Key responsibilities are as follows:

- a. Recommend, develop and implement policies and practices to assure the Company's commitment to and implementation of its Affirmative Action Program.
- b. Disseminate the EEO policy by maintaining communication with local community action groups, recruitment sources, minority and female organizations, workers with disabilities organizations, protected veteran organizations and educational institutions.
- c. Inform management of any legal developments as it pertains to EEO compliance.
- d. Maintain a record of job applicants, indicating applicants' job capabilities, race and disposition of the application.
- e. Develop and maintain an annual audit report of all hiring, promotions, transfers and terminations.
- f. Display all related employment posters, bulletins, and policy, in a central location in each company facility.
- g. Encourage minority, female, disabled and veteran employees to participate in all Company-sponsored educational, training, recreational and social activities.
- h. Maintain an "open-door" policy for learning and development opportunities and career advancement counseling for employees.

The local human resources representative is available to discuss this policy and to answer questions regarding its implementation.

Compliance

RigNet management intends that the existence of an established channel for complaints will assure full compliance with RigNet's EEO policy and Affirmative Action Program, and facilitate prompt remedial action, if needed. Any employee who believes he or she has been the victim of a violation of this policy or believes he or she has witnessed such conduct should discuss their concerns with their immediate supervisor, area manager, Human Resources, or any member of the executive management team. Human Resources will investigate complaints or problems initiated by an employee and will formulate recommendations for the proper disposition to the Vice President - Global Human Resources. Employees shall understand that they have the option of filing a complaint directly with either the Equal Employment Opportunity Commission or the Office of Federal Contract Compliance of the Department of Labor if they believe that RigNet is not appropriately complying with its equal opportunity or affirmative action obligations. This policy is intended as a guideline to assist in the consistent application of RigNet's policies and programs for employees.

The policy does not create a contract implied or expressed, with any RigNet employee, who are employees at will. RigNet reserves the right to modify this policy in whole or in part, at any time.

Approved by Shelly Buchman – Vice President – Global Human Resources

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