



# CODE OF CONDUCT

Our People, Our Promise

# Making it happen

We work to be our customers' most valuable partner by renting quality tools and equipment that they need to accomplish their goals. We provide services and solutions that enable people to get things done, communities to grow and team members to thrive.

We honor the promises we make and meet the goals we set by putting our key stakeholders (our people, our customers and our shareholders) first and observing the following principles in every action we take:

**Safety** – We engage in all activities safely and work together to reduce risk, ensuring that everyone goes home uninjured each and every day.

**Innovation** – We are smart, hardworking and resourceful problem-solvers. We leverage our knowledge and experiences to deliver products, solutions and services beyond the norm.

**Trust** – We own our words and actions and stand behind our commitments. We care for our customers and each other. We operate in a manner that contributes positively to the communities where we work and live.

**One Team** – We respect each other and the value each individual brings to the organization. It is our shared purpose and teamwork that give us the power to succeed.

We own the future of rental. We set the standard in our industry by constantly advancing the idea of what a rental company can do for its customers, through unmatched customer solutions, uncompromising customer safety and continuous innovation.



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# OUR CODE

IT'S NOT JUST WHAT WE DO. IT'S HOW WE DO IT.

## IN THIS SECTION:

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- Our Code: The Rules by Which We Work
- The Responsibilities We All Have
- The Added Responsibilities of Leaders
- Help With Tough Choices
- Reporting Concerns



# Our Code: The Rules by Which We Work

## We're not like any other company.

Our Code of Conduct is simple: Our expectation is to do what's right and to act with integrity.

These standards will help you understand how we apply this to the work we do every day. We set the standard for what an equipment rental company can do. We provide industry-leading equipment and tools, a nationwide network of locations and a team of will-do experts to deliver an exceptional level of service to our customers.

We've built a company we can be proud of. But there is no one-size-fits-all approach to getting the job done. Every day offers unique challenges that require us to make good decisions. It's not easy. And sometimes the right decision isn't obvious.

Our Code of Conduct ("Code") is designed to help.



### Our Code:

- Summarizes the laws, regulations and company policies that affect our business
- Defines terms you may hear and everyday situations you may face on the job
- Provides you with the information you need to promote integrity and ethical behavior
- Links you to policies where you can find more detailed information
- Points you to people who are ready to support you when you need additional guidance

Together, with our Team Member Handbooks and our framework of company policies, our Code helps us keep our promises and honor our values – in every relationship, every transaction, every situation.

## Who does our Code apply to?

All of us – every team member, including executive management, officers and directors. Each of us has a responsibility to know and follow our Code and to ask questions about anything that's unclear.

We also expect our business partners to observe high standards of business conduct. Our expectations for our suppliers and their manufacturers are described in our [Supplier Code of Ethics](#).

If you are a member of a labor union and believe a section of our Code conflicts with your applicable collective bargaining agreement, or if you have any questions about how our Code relates to your collective bargaining agreement, talk to your leader or union representative. Nothing in our Code changes the employment terms or conditions of a union collective bargaining agreement.

## What happens if someone violates our Code?

Our reputation is built on ethical decision-making, so when one person violates our Code, it affects us all. That's why, as a company, we take violations seriously.

Anyone who violates our Code, our policies or the law may face disciplinary action, up to and including dismissal. In some cases, there can even be civil or criminal consequences for the person involved and for our company.



### Want to Know More?

- Disciplinary Action Policy
- Ethics Policy

# The Responsibilities We All Have

There are some things about working at Sunbelt Rentals that are just non-negotiable. They're the kinds of things that make Sunbelt Rentals a great place to work and a great company to do business with. We count on you to:

- Know and follow our Code, our policies and the laws that apply to your job. Don't ever let the pressure to succeed make you do things you know are wrong.
- Complete all required team member training and ask questions about anything that's unclear.
- **Share concerns** about anything unethical or illegal, and cooperate with any investigations into misconduct. Coming forward is not always easy, but it's always the right thing to do. Sunbelt Rentals is committed to providing a workplace that is free from any sort of retaliation, as described in our Whistleblower Policy.



## Make It Happen!

We're committed to following the law wherever we operate. If any part of our Code conflicts with a law, regulation or requirement, the law always takes precedence.



# The Added Responsibilities of Leaders

Leaders have additional responsibilities. They set the standard for how business gets done. If you manage other team members:

- Lead by example. Show – through your words and your actions – that you’re committed to conducting business the right way.
- Be open and available. Create the kind of work environment where team members feel comfortable coming to you with questions.
- Listen to team members’ concerns. Guide them through issues, using our Code as a resource and escalating issues through the appropriate channels when necessary.
- Never retaliate or let others retaliate. Do not allow retaliation against anyone who raises a concern or participates in an investigation into misconduct.




# Help With Tough Choices

Our Code can't address every situation you may face on the job – at some point, we will all experience situations where the right path is not clear. When that happens, it can help to stop and ask yourself:



If you can answer “yes” to all five questions, it’s probably safe to move forward. But a “no” or “I’m not sure” to any of them means you should stop and ask for guidance before proceeding. In every case, use good judgment, doing the right thing for the right reasons. And remember: It’s always OK – in any situation, under any circumstances – to ask for help.

 **Here’s a Question ...**

**We have an opportunity to partner with a customer on a big job, one that will give us a lot of visibility in the community and could lead to future work for Sunbelt Rentals. I have some concern that we’ll need to disregard some of our safety requirements in order to get it done, but that’s probably OK given the other jobs we’re likely to get, right?**

Not right. We have built a reputation for doing whatever it takes to help our customers be successful, but we never ignore safety requirements. Never. Disregarding these requirements could put our team and our customers (and perhaps, even others) at risk and send a signal to other customers in the community that Sunbelt Rentals can’t be trusted. Always remember: the right thing for the right reasons.





# Reporting Concerns

It takes courage to come forward and report a suspected violation of our Code, our policies or the law. Reporting a suspected violation is one of the most important things you can do to preserve an ethical company.

If you see or suspect misconduct, share your concerns with your leader – they are often in the best position to understand and respond to the issue.

If you're uncomfortable speaking with your leader, or if you've already raised an issue with them and it hasn't been addressed, you may reach out to any of the following resources:

- Another leader
- Your Human Resources Representative
- The Legal Department
- The Performance Standards Department
- Any Sunbelt Rentals Vice President
- The toll-free Sunbelt Rentals **HR Helpline** (for any employment-related or Team Member Handbook questions):

Phone: 866-573-6246

Email: [humanresources@sunbeltrentals.com](mailto:humanresources@sunbeltrentals.com)

Mail: Sunbelt Rentals Human Resources Dept.

1646 West Highway 160, Suite 8162

Fort Mill, SC 29708-8010

- The **Independent Compliance Hotline** (for any Code of Conduct concern or question, including anonymous complaints if that is the reporter's preference):

Phone: 844-960-0579

Web report: [www.sunbeltrentals.ethicspoint.com](http://www.sunbeltrentals.ethicspoint.com)

Regardless of who you contact, be assured that Sunbelt Rentals will investigate your concern.



## Did You Know?

The Independent Compliance Hotline allows you to ask questions or share concerns 24/7. Translators are available, and anyone who contacts the Hotline may do so anonymously, unless prohibited by law. Information provided through the Hotline is documented in detail by an independent third-party interview specialist and forwarded to Sunbelt Rentals for investigation and resolution.

## No Retaliation Here

We want you to feel comfortable coming forward so, as a company, we don't tolerate retaliation against anyone who speaks up, in good faith, about unethical or illegal behavior.

Reporting "in good faith" means making a genuine attempt to provide honest information, even if it later proves to be unsubstantiated or mistaken.

If you think that you or someone you know has been retaliated against for raising an issue, please come forward to your Human Resources Business Partner or use any of the resources listed on this page.

All team members are required to cooperate in company investigations into any workplace complaint. It is a violation of our Code to interfere with or refuse to cooperate in an investigation or to make false statements or accusations.



## Want to Know More?

Grievance Policy

Reporting Your Concerns Policy

Whistleblower Policy

# OUR PEOPLE

OUR TEAM DEFINES WHO WE ARE.

## IN THIS SECTION:

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- Health, Safety and Wellness
- Substance Abuse
- Diversity, Equity and Inclusion
- Human Rights and Fair Wages
- A Respectful Workplace



# Health, Safety and Wellness

**We want you to return home from work injury-free, every day.**

Your safety and the safety of our customers is more than a priority for us, it's the foundation on which we've built our business. Through personal protective equipment, safety videos, safety training, power up, and other tools and meetings – we want you to have the knowledge and the skills you need to do your job safely. We count on you to be alert, aware and in compliance with all safety requirements at all times.



## Safety Is What We Are About:

**We Engage:** We willingly engage in safety activities and work together each day to reduce exposure. Making it safer is in our DNA.

**We Pause Work:** We recognize hazards and risks, and pause work to make sure it is safe before continuing.

**We Speak Up:** We intervene and provide feedback to anyone at any time even when it feels uncomfortable in the moment.

**We Learn:** We have a “get better” mindset and seek to learn from our successes and failures.

**We Care:** We take pride in owning safety for ourselves and helping our team members and our community to remain protected.

## What This Means for You



**Make safety a priority.** Follow all safety laws, policies and regulations that apply to your job and your work location. Complete any required training before taking on assignments or repairing equipment. Keep your work area clean and organized. Wear personal protective equipment (PPE) when required – it can reduce your exposure to injuries.

**Watch out!** See a spill? A cord in the walkway? A vehicle parked too close? A broken tool? Someone standing on a stack of pallets instead of a ladder to reach something? Keep an eye out for hazards and tell your leader about anything that could pose a risk to you, your team members or others.

**Keep violence out.** Practice good physical security at our facilities and report any strangers, suspicious activity or threats of violence. We prohibit weapons whenever and wherever you conduct company business unless permitted by State, Provincial and Federal laws.



## Here's a Question ...

**One of my team members backed a forklift into one of the generators. Nobody seems to be hurt, and the generator doesn't appear to be damaged. Do we need to report this incident?**

Yes. Speaking up about accidents or close calls is part of putting safety first. You should report the incident (within four hours or as soon as possible) so that we can check on the driver and properly assess any potential damage to the equipment.



## Want to Know More?

Sunbelt Rentals Policy & Procedure Manual  
 Sunbelt Rentals Safety Standards

Safety Rules and Regulations Policy  
 Company Vehicle Policy

Driving With Mobile Devices Policy  
 Housekeeping Policy

Weapons Policy  
 Workplace Violence Policy

# Substance Abuse

**We expect every team member to be at their best.**

Working under the influence of any substance can impair performance, compromise safety and have an adverse effect on the services we provide to our customers. That's why we do not tolerate substance abuse in the workplace. Each of us is expected to perform our work free from the influence of any substance that could affect our judgment, our safety or the safety of others.



## What This Means for You

**Be safe, be productive.** Do not use or possess alcohol while on company property, when operating our vehicles or equipment or at any time you are conducting business on behalf of Sunbelt Rentals. And do not use, possess or sell drugs, controlled substances or drug paraphernalia while on our property, in our vehicles or carrying out our business.

**Be aware.** As part of our commitment to a safe and healthy workforce, we conduct drug and alcohol testing as permitted by State, Provincial or local laws.

**Look out for each other.** If you see or suspect that a team member's judgment or abilities are impaired, **say something**, and if you need help dealing with a drug or alcohol problem, contact the [Sunbelt Rentals Employee Assistance Program](#).



## Want to Know More?

Sunbelt Rentals Policy & Procedure Manual  
 Sunbelt Rentals Safety Standards  
 Substance Abuse Policy

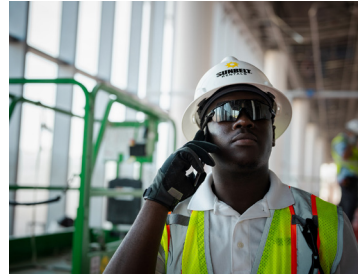
Use of Marijuana Policy  
 Use of Prescription or Legal  
 Non-Prescription Drugs Policy



# Diversity, Equity and Inclusion

## Our greatest asset is you.

At Sunbelt Rentals, we are one team. Our commitment to diversity and inclusion allows all team members to bring their true selves to work every day to fully engage and support one another. Our collective experiences and unique perspectives help us deliver for our people, customers, communities and investors.



**Expect our business partners to put fairness first, too.** We expect our vendors, suppliers, subcontractors and other third parties to observe the same equal employment opportunity standards as we do.

**Speak up.** If you see or suspect any action that violates our commitment to diversity, equity and inclusion, **say something**. We are all responsible for making sure we create a respectful workplace. Remember, you will never be retaliated against for raising a genuine concern or participating in an investigation into misconduct.

## What This Means for You

**Celebrate our differences.** Often, a different idea can result in a better outcome, so listen and be open to other points of view. Value the contributions of every team member, and do your part to create a safe and welcoming place for everyone at Sunbelt Rentals to be themselves.

**Put fairness first.** We are an equal opportunity employer and prohibit discrimination based on any legally protected class. We provide reasonable accommodations for qualified team members and job applicants by offering reasonable alternatives to see that everyone has the ability to apply, work and engage with us. And we fulfill all of our state and federal affirmative action obligations to ensure that people of all races, women, individuals with disabilities, veterans and individuals with other protected characteristics are treated fairly. If you are responsible for recruiting, hiring, promoting or any other employment-related decision, honor our commitment to always select the most qualified individual regardless of protected status and provide everyone interested in a career with Sunbelt Rentals an equal chance to succeed.



## Did You Know?

We have several programs designed to develop and empower our team members including:

- The [Sunbelt Rentals Veterans Program](#)
- [Diversity and Inclusion \(D&I\) groups](#)
- [Women: Inspired. Supported. Empowered. \(WISE\)](#)



## Want to Know More?

- Equal Employment Opportunity Policy
- Diversity & Inclusion Policy
- Affirmative Action Policy
- Compliance With Executive Order 11246 and Other Statutes Policy

- Reporting Your Concerns Policy
- Pregnancy Fairness Policy
- Accommodations for Disabilities or Religious Purposes Policy

# Human Rights and Fair Wages

## We honor the contributions of every individual.

In the workplace, jobs and job responsibilities may vary, but every team member, everywhere, is entitled to a legal wage and safe working conditions. We support efforts to protect human rights and the dignity of all people, not only those on our own team, but those in our supply chain and in the communities where we operate.



## What This Means for You

**No forced labor.** Respect and protect human rights. Slavery, human trafficking, child labor and forced labor are all strictly prohibited at Sunbelt Rentals, and we do not knowingly conduct business with anyone or any company that participates in human rights abuses.

**Fair wages.** As an equal opportunity employer, we are committed to paying all of our team members fairly, in accordance with the requirements of local, state and federal laws.

**Do the right thing.** If you're an exempt (salaried) team member, you're expected to work the hours it takes to accomplish your duties. If you're a non-exempt (hourly) team member, you're expected to be accurate and honest in reporting your time, take your meal and rest breaks and never work "off the clock."

**Be alert.** If you have any concerns about a human rights violation, immediately report those concerns. When you see a warning sign, [speaking up](#) is always the responsible thing to do.



## Here's a Question ...

**I'm an hourly team member and sometimes, when things are really busy, my leader will ask me to stay an extra half hour after my shift without recording the time. I don't mind helping out, but is this OK?**

No. Your leader is prohibited from asking you to work outside your regular hours or to be dishonest about what you record. You should bring this situation to the attention of your [Human Resources Representative](#) or the [Sunbelt Rentals HR Helpline](#) as soon as possible.



## Want to Know More?

- Equal Employment Opportunity Policy
- Minimum Age Requirements Policy
- Government Contracting Policy
- Fair Labor Standards Act (FLSA) Policy
- Exempt Employees Policy
- Non-Exempt Employees Policy
- Salaried Non-Exempt Employees Policy
- Overtime Pay Policy
- Timekeeping Policy
- Meal Breaks & Rest Periods Policy

# A Respectful Workplace

**Harassment, bullying, violence and discriminatory conduct are prohibited at Sunbelt Rentals.**

When we treat others the way we want to be treated, we promote a positive workplace – the kind of environment where people feel respected and able to do their best work. Building and preserving a safe, free-from-harassment culture isn't the job of one person or one department; it's everyone's job.

## What This Means for You

**No harassment, no bullying, no violence, no discrimination.** In every interaction you have – whether with team members, vendors, consultants, customers or visitors, and whether you're at work, at a work-related event or communicating with team members about work online outside of work – be considerate and respectful. Remember that each of us has the right to a workplace that is free from disrespectful conduct.

**Be proactive.** Harassment can be physical, verbal or visual. Check our policies to make sure you understand the different forms that harassment (including sexual harassment) and bullying can take. That understanding will help you spot and respond to disrespectful conduct when you see it.

**Take action.** If you see, suspect or experience harassing, bullying, violent or discriminatory behavior, ask the offender to stop (only if you are comfortable doing so) and immediately report the behavior to your leader, your [Human Resources Representative](#) or the [Sunbelt Rentals HR Helpline](#) at 866-573-6246. Keep in mind that Sunbelt Rentals prohibits retaliation against anyone for making a harassment complaint or cooperating in a harassment investigation.



## Did You Know?

Harassment doesn't have to be intentional to be unlawful. The focus is not on what a person intended, but how someone interprets the words or actions directed at them.



## Here's a Question ...

**One of my team members often calls me a name that insults me and my nationality and then says, "just kidding." This has been going on for a long time, and it really upsets me, but when I ask my team member to stop, they tell me I'm being too sensitive. What should I do?**

Name-calling like this is hurtful and inappropriate. You should report the conduct and seek help and support from your leader or another [Sunbelt Rentals resource](#).



## Want to Know More?

Discriminatory Harassment Policy  
 Sexual Harassment Policy

Reporting Your Concerns Policy  
 General Harassment & Bullying Policy

# OUR RELATIONSHIPS

WE PARTNER RESPONSIBLY.

## IN THIS SECTION:

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- Customers
- The Government
- Business Partners





# Customers

## Our customers put their trust in us.

From our equipment to our people and our physical locations, our customers deserve an exceptional, no-surprises experience when they partner with us. We owe them our absolute best every day to make their task quicker, easier and problem-free. In every interaction, be helpful and honest. Remember it's the "how" that sets Sunbelt Rentals apart – no one does it how we do it.



**Insist on quality.** We work to provide a superior experience for our customers and want them to come back to us for their next project. In every interaction, be responsive, be friendly and be accountable for any issues or complaints that arise, managing them to resolution. When you deliver great customer service, you build strong relationships and repeat customers.



## Make It Happen!

When customers are faced with a task or a problem, we want to be the first place they turn for help. When we help them succeed, we create a customer for life.

## What This Means for You

**Show your make-it-happen attitude.** When customers reach out to us, be the problem-solver on the other end of the phone and build trust. Our customers' challenges are our challenges. So, give them the assurance that their project – large or small – is being handled the right way, with the right equipment at the right time. In every situation, we're not just renting equipment and tools, we're providing solutions and getting things done.

**Deal fairly.** Compete in the marketplace on the merits of our products and services, our prices and the strength of our customer relationships. Always be accurate and truthful about the quality, features and availability of our products and services. Never mislead anyone to gain an advantage. Be truthful about our competitors' products and services, too. Don't criticize or interfere with any contracts our competitors may have with our customers.



## Want to Know More?

- Commercial Contracting Policy
- Fair Competition Policy
- Sunbelt Rentals Policy & Procedure Manual

# The Government

**We're proud to serve any number of government entities as our customers.**

The government contracting process is heavily regulated and follows stricter rules than sales to commercial customers, and we meet those high standards. Our work is helping the government meet its public policy objectives and provide taxpayers with a good value on products and services, so it's critical that we adhere to all of our government contractor obligations.



## What This Means for You

**Know what's expected.** If you're responsible for bidding, pricing, negotiating or performing government contracts (whether Sunbelt Rentals is the primary contractor or subcontractor, or selling to a commercial customer who is a contractor), be a responsible partner. Comply with all applicable government contracting laws and regulations. In every transaction, remember that honesty, transparency and accountability are critical for not only winning, but keeping, our government business.

**Be accurate, honest and complete.** Make sure any claims for payment we submit or cost or pricing data we provide are correct. Never lie or make false, fraudulent or misleading statements – verbally or in writing – to any government official or agency. Questions about our government contracts or the laws, regulations or standards that apply? Contact the [Legal Department](#).

**Be a good caretaker.** Protect classified information from unauthorized disclosure, comply with government security requirements and safeguard any government-furnished material or equipment that's entrusted to us.



## Make It Happen!

Preserve procurement integrity by never seeking out, asking for or accepting information that we're not authorized to have, including:

- Confidential or proprietary pricing information of our competitors
- Nonpublic government documents that relate to bidding or source selection



# The Government Cont.



**No bribes, no kickbacks.** Operate with integrity. Always. Never accept any bribes or kickbacks when negotiating or fulfilling contractual obligations. Make sure an outside observer would approve of the way we're doing business and that there isn't even the appearance of **anything improper**.

**Beware of gift-giving.** The rules for what we may offer to – or accept from – government employees are very strict. Don't pay for gifts, meals, lodging, travel, prizes or other incidentals for government employees. Distributing items (less than US \$20) may be OK in certain situations, but make sure you know what's allowed by our policies and always obtain approval from executive management before offering anything of any value to a government employee.

**Beware of discussing employment, too.** Obtain approval from executive management before talking about any consulting or employment opportunities at Sunbelt Rentals with former or current government employees, elected officials or their family members. There are strict rules about leaving government service to work in the private sector, and breaking them can have serious consequences for the government employee, for you as an individual and for our company.

## Want to Know More?

Government Contracting Policy

Eligibility for Employment Policy

Sunbelt Rentals Policy & Procedure Manual

# Business Partners

**We expect our partners to uphold the same high standards we do.**

A partner who delivers late, whose work is sloppy or whose product or service quality is poor affects our work and our ability to provide a perfect rental experience to our customers. So, we're particular about who we work with and uncompromising about what we expect of them. Do your part to position our partners and our company for success.



## What This Means for You

**Aim high.** If your job involves sourcing and selecting business partners, look for those who not only meet our business needs but share our commitment to working honestly and with integrity. Choose partners based on objective criteria – things like quality, price, experience and delivery record – and document all agreements in writing.

**Stay involved.** Once a contract is in place, [communicate expectations](#) and monitor performance to ensure our partners are meeting their obligations. If they are working with us on a government contract, they should understand the requirements that flow down to them.

**Avoid conflicts of interest.** Always make business decisions based on what's best for Sunbelt Rentals, not on favoritism or personal relationships (see [Conflicts of Interest](#) for more information).



## Here's a Question ...

**I'm not sure, but I think one of our contractors offered a bribe to a government inspector. Should I ask more questions before saying something?**

Don't wait. Bribery is serious. Come forward immediately and share your concerns with your leader or other [Sunbelt Rentals resource](#) and let us investigate. As a company, we're responsible for the actions of third parties who work on our behalf, so this contractor's actions could not only have consequences for their company, but for our company as well.



## Want to Know More?

Commercial Contracting Policy

# OUR COMPANY

**WE'RE POISED TO PROVE WHAT AN EQUIPMENT COMPANY CAN DO.**

## IN THIS SECTION:

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- Company Assets
- Conflicts of Interest
- Gifts and Entertainment
- Confidential Information
- Data Privacy



# Company Assets

**When we protect our assets, we protect our reputation.**

The equipment and tools we rent out to customers are valuable company assets. But so are the many everyday things we use to do our work – our vehicles, facilities, office equipment, computer hardware and software, networks, internet access and databases. Be a good steward of what’s assigned to you and protect our assets from fraud, waste, abuse and misuse.

## What This Means for You

**Protect ...**

**Our physical assets.** Use them as they’re meant to be used and not for your personal benefit, unless allowed and approved by your leader. Don’t borrow, lend, give away or dispose of any of our assets unless you have approval from our company’s executive management.

**Our electronic assets.** Follow our IT policies and practice good cybersecurity to keep our systems and our networks running smoothly and virus-free. Use only company-approved hardware, software applications and storage devices.

**Our vehicles.** Safety first. Know and follow our policies including those related to licensing requirements. Don’t let anyone who is not authorized drive a vehicle that’s assigned to you. Always follow the rules of the road, and if law enforcement issues a traffic stop, report it immediately to your leader (no later than two hours).

**Personal use?** Use of company assets (such as phones, copiers and email) for personal reasons is permitted, but make sure your use is only occasional and never violates our policies or the law or interferes with your job responsibilities.

**Don’t have any expectation of privacy.** Anything you write, send, download or store on our systems is company property and, where permitted by law, may be monitored.



## Make It Happen!

Good cybersecurity means:

- Creating strong passwords and not sharing them with anyone
- Not opening email attachments from unknown senders
- Not clicking on suspicious files or links that could put our systems at risk
- Only accessing our networks via authorized applications and devices
- Never copying or using unlicensed or “pirated” software on our systems
- Locking your computer anytime you step away and logging off at the end of your workday
- Reporting any lost or damaged device



## Want to Know More?



Use of Rental Equipment Policy

Company Vehicle Policy

Fuel Cards Policy

Personal Telephone Calls, Mail and Email Policy

Employer Property Policy

Serious Traffic Violations Policy

Working Remote Policy

Electronic Communication Systems Acceptable Use Policy

Desktop and Laptop Computers Policy

Mobile Devices & Other Electronic Devices Policy

Use of Personal Cell Phones and Other Electronic Devices Policy

Separation From the Company Policy

# Conflicts of Interest

**Things you do outside of your Sunbelt Rentals work should never interfere with the work you do for us.**

We count on every team member to make decisions based on what's best for Sunbelt Rentals. It's important to know the definition of a conflict of interest, recognize the kinds of situations where conflicts often arise and come forward about any actual or potential conflicts as soon as you become aware of them.

## What This Means for You

**Know a conflict when you see one.** Any outside interest, activity or relationship that affects your ability to make fair, objective decisions for Sunbelt Rentals can pose a conflict of interest. There are certain situations where conflicts typically arise. Being aware of these situations is the first step in avoiding a conflict.

**Ask yourself ...** It's not possible to list every potential conflict of interest. In trying to decide if a situation could present a conflict, ask yourself:

- Could this situation interfere with my responsibilities at Sunbelt Rentals?
- Could it affect the business decisions I make?
- Could others (inside or outside of Sunbelt Rentals) view this as a conflict of interest?

If the answer to any question is "yes" or "I'm not sure," there may be a potential conflict, so seek guidance before you act.

**Disclose.** Sometimes, even if you're careful, conflicts can happen. In those cases, disclose the potential conflict – or the appearance of one – to your leader, so that we can work together to address and manage it.



## Here's a Question ...

**I'm a driver for Sunbelt Rentals. Can I take on a job as a driver for another company as long as it doesn't affect my performance on the job?**

It depends. You're prohibited from taking on any side work that conflicts with the Department of Transportation regulations or our company's Hours of Service Policy. Before accepting the job, disclose your plans to – and get approval from – your leader.



## Did You Know?

A conflict of interest can happen when you:

- Start a business (or a second job at a company) that competes, does business or wants to do business with us
- Take for yourself an opportunity that you discover through your work at Sunbelt Rentals
- Invest in one of our customers, competitors or business partners
- Supervise a friend or family member

Remember that even the perception of a conflict can be a problem if it makes others question your motives or your loyalty to Sunbelt Rentals.



## Want to Know More?

Conflicts of Interest Policy

Employment of Relatives/Nepotism Policy

Employee Fraternization Policy

Hours of Service Policy

# Gifts and Entertainment

**Before giving or accepting a gift or offer of entertainment, ask yourself: What is the intent?**

If an offer is made to further a business relationship or build goodwill with a customer or a partner, and the offer complies with our policies, it's potentially OK. But if the intent is to win or keep business or gain an improper business advantage, a "gift" could be a bribe, and you must not offer or accept it.

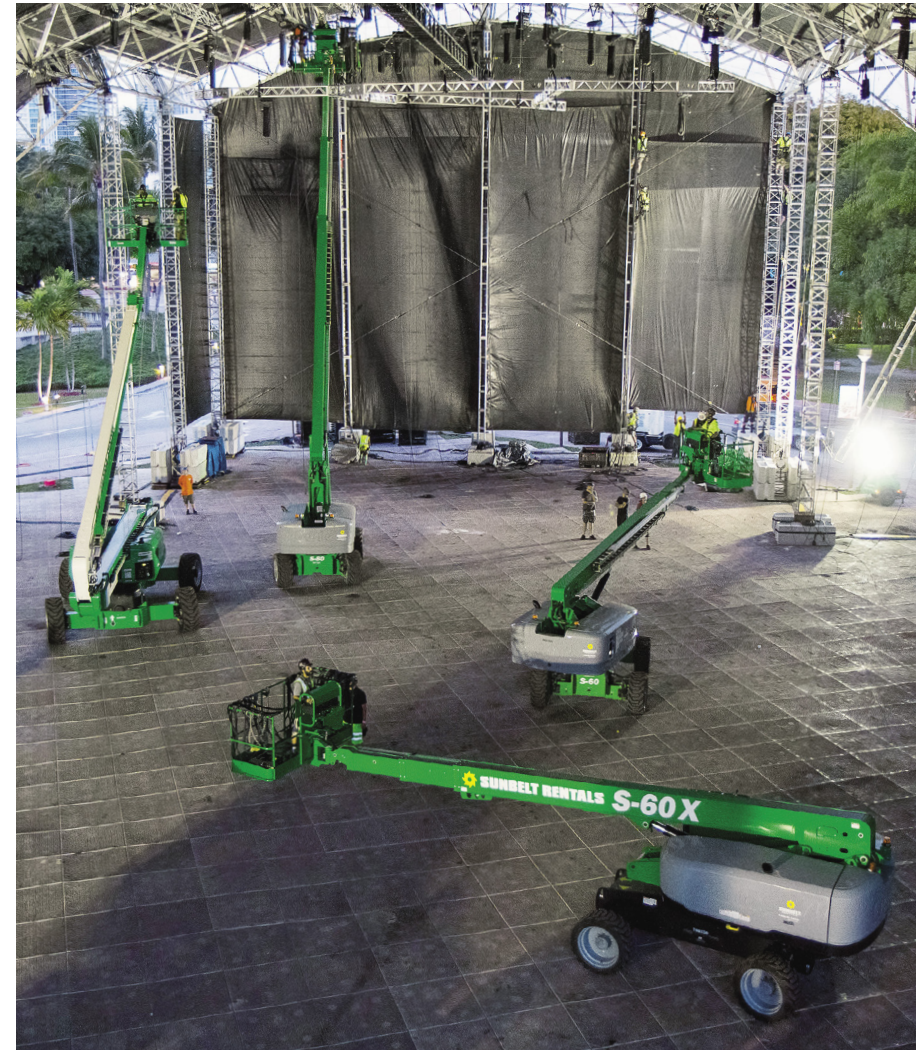


## What This Means for You

**Don't let gifts or entertainment influence you.** Gifts and entertainment can pose a conflict of interest if they make it hard for you to be objective about the person or company that provides them. That's why anything we give or accept should be nominal in value, offered only occasionally and never be in the form of cash. If the gift has the potential to influence you, or if you suspect it was given to you with that purpose in mind, you should decline the gesture. Talk with your leader before you give or receive a gift or offer of entertainment to make sure it's reasonable under the circumstances.

**Working with a government employee?** The rules for what we may give and accept are much more strict when dealing with a government employee. Don't offer anything of value to a government employee unless you've received approval in advance from executive management.

**Know when to say "no."** Politely refuse any gift or invitation that exceeds nominal value or is inconsistent with our policies. If you encounter a situation where you can't gracefully decline a gift, accept it, but immediately notify your leader so they can determine the proper next steps.




## Want to Know More?

 [Gifts/Bribes/U.K. Bribery Act Policy](#)

[Government Contracting Policy](#)



# Confidential Information

**Information that belongs to Sunbelt Rentals gives us a competitive advantage, so we're careful to protect it.**

Confidential information – about Sunbelt Rentals, our equipment, our services and our customers – is one of our greatest assets. It fuels our day-to-day operations and helps us make strategic decisions about our business for the future. Protect it at all times and in all places.



## What This Means for You

**Keep confidential information confidential.** The improper use or disclosure of Sunbelt Rentals' confidential information can cause serious harm to the company, our customers and our business partners. Be careful to never discuss confidential information in public places, like restaurants, elevators or airports.

**Keep intellectual property confidential, too.** Trademarks, trade secrets, patents and copyrights – all of the creative work or ideas that set us apart and represent a significant investment of our time and resources – must also be protected. Be aware that Sunbelt Rentals owns any work product you develop or design in connection with your work with us. And that ownership continues even if you leave the company.



## Did You Know?

Confidential information includes:

- Customer lists, files and rates
- Unpublished financial information and revenue figures
- Vendor pricing and contract terms
- Quotes, contracts and pricing strategies
- Source code
- Forecasts and estimates including sales and marketing plans
- **Personal data about team members, customers or third parties**

Note that these are only a few examples. If you're not sure if information is "confidential information," ask.

# Confidential Information Cont.

**Respect the confidential information of others.** Your responsibility to safeguard confidential information and intellectual property extends to any information that our suppliers, vendors or other business partners entrust us with. Any disclosure of this information could expose us to liability and damage our reputation.



## Here's a Question ...

**One of my new team members used to work for one of our competitors and offered to share some pricing strategies developed by their former employer. That's great – it could give us an edge over our competitor, right?**

No. We earn business the right way. It's OK for your team member to apply the general knowledge and skills learned in their previous work. But information that's proprietary to the company would violate your team member's obligations, our policies and possibly the law. Your team member is obliged to protect confidential information about their former employer – just as you would have a responsibility to protect our confidential information should you ever leave Sunbelt Rentals.



## Want to Know More?

- Confidential Information Policy
- Employee Records Policy
- Inventions/Intellectual Property Policy



# Data Privacy

**No one wants to learn that their personal information has been disclosed without their consent.**

News reports regularly profile instances where sensitive data is stolen or leaked, putting accounts or information in the hands of someone who is unauthorized to have it. This type of negative publicity can damage a company's reputation. Help us make sure that any news about our company is focused on our good work and not a data breach. Fiercely protect the personal or otherwise confidential information of our team members, customers and business partners.



## What This Means for You

**Be a good steward.** Collect, use, process and store our customers', team members' and business partners' data in accordance with the law and our privacy notices and policies. Remember that personal data is **confidential information**, so observe the same high standards of care when handling it, and don't share it with anyone – inside or outside of Sunbelt Rentals – unless they have a legitimate business need for the information.

**Report breaches right away.** If you suspect that privacy has been breached and personal data disclosed (whether intentionally or accidentally), report it immediately to your leader.

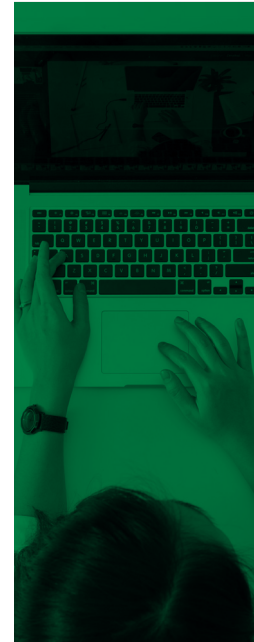


## Did You Know?


Personal data is any information that can identify someone directly or indirectly, including their:

- Name, address or phone number
- Employee ID
- Email or IP address
- Biometric data
- Credit card information
- Banking or payroll information

Not sure if some information is personal information? Treat it as though it is!



## Want to Know More?

-  Data Privacy Policy
- Confidential Information Policy
- Employee Records Policy

- Privacy Protection for Social Security Numbers Policy
- Biometric Information Policy

# OUR BUSINESS ACTIVITIES

WE MAKE IT HAPPEN — LAWFULLY, ETHICALLY, TRANSPARENTLY.

## IN THIS SECTION:

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- Accurate Records
- Anti-bribery
- Competition and Antitrust
- Insider Trading
- Public Communications and Social Media



# Accurate Records

## We are all responsible for maintaining accurate records.

When we think of company records, we often think of regulatory filings and financial statements. But company records also include invoices, expense reports, purchase orders, safety reports, time sheets, benefit claims, contracts and all of the other documents (paper or electronic) that keep our business running. No matter your role, you're responsible for accurate recordkeeping.



## What This Means for You

**Be accurate, honest and thorough.** Follow the systems, internal controls and procedures we have in place to be sure our records accurately reflect every transaction. Provide supporting documentation when required.

**Be accountable.** Watch for and [speak up](#) about fraud, dishonesty or other suspicious activities. Remember: No one at Sunbelt Rentals has the authority to make you do something unethical or illegal.

**Meet our legal obligations.** If you're responsible for providing financial disclosures to the government or regulatory authorities, provide truthful and timely information. Cooperate fully with any audits or investigations.

**Follow our policies.** Accurate recordkeeping also means properly retaining, storing and disposing of records. Take care to secure documents that may be relevant to a legal proceeding and never destroy any material that may be subject to a Litigation Hold.



## Make It Happen!

Be alert to some recordkeeping red flags, such as:

- "Off-the-books" accounts
- Costs that are assigned to the wrong project
- Sales that are tracked to the wrong time period
- Documents that lack the proper approvals or supporting documentation
- Large cash payments or unusual fund transfers
- Falsification, forgery or alteration of a check or financial document



## Want to Know More?

Fraud Policy

Preservation of Evidence Policy

Timekeeping Policy

Business & Travel Expenses Policy

Company-Issued Credit Cards Policy

# Anti-bribery

**We don't offer or accept a bribe at any time, for any reason, and we don't let someone else bribe on our behalf.**

Our message about bribery is simple: We win business the right way – always by offering the best products and services in the industry, never through kickbacks, bribes or acts of corruption. Make sure you can recognize a bribe when you see one, and be prepared to walk away from business if there is any expectation that you will do something improper.

## What This Means for You

**Our policy is zero tolerance.** Never request, offer or accept anything of value to influence a business decision or win (or hold on to) business. Be careful – a bribe can be something other than cash. It can take the form of a gift, a favor, a vacation, a donation or even a job offer. No matter what form it takes, anything offered in exchange for an unfair business advantage violates our policies and the law.

**Keep an eye on our business partners.** We can be held accountable for bribes they make on our behalf. So, make sure you know who you're working with, be alert to any suspicious activity and **speaking up** if you see or suspect anything unethical or illegal.

**Exercise caution with gift-giving.** Follow the rules when it comes to **gifts and entertainment** to avoid even the possibility that a business courtesy could be perceived as a bribe. And remember: The rules for what you can give to a government official are **even more strict**. Obtain approval in advance before offering a government official anything of any value.



## Here's a Question ...

**One of our vendors offered to waive a fairly large transaction fee in exchange for an agreement from me to interview their very qualified son for an open position at Sunbelt Rentals. We could save money and potentially hire a great candidate. Any problem with this?**

Yes, the vendor offered something of value – waiving a fee – in exchange for favorable treatment – an interview. What may seem beneficial at the outset is, in fact, improper and maybe even illegal. The best course of action would be to report the incident to your leader.



## Want to Know More?

Gifts/Bribes/U.K. Bribery Act Policy

Government Contracting Policy



# Competition and Antitrust

**Put our very best out into the world and let the competitive marketplace determine our success.**

We believe that everyone benefits from competition. It drives companies to innovate and improve their products and services. And it gives customers the benefit of many options and competitive prices. We follow antitrust and competition laws, not just because it's the lawful thing to do, but because it's the right thing to do.

## What This Means for You

**Compete fairly.** Steer clear of discussions with competitors about competitively sensitive topics and never enter into any agreements – formally or informally – that could limit competition. Antitrust laws are complex and the consequences for violating them are severe; if you're ever unsure of what's OK, it's best to ask for guidance from your leader, your [Human Resources Representative](#) or the [Legal Department](#) before proceeding.



### Here's a Question ...

**If an informal conversation with a competitor at an industry trade show starts to veer off into a discussion about, say, pricing strategies, what should I do?**

You need to be careful, knowing that even casual conversations can potentially violate the law. If you're ever in a situation where a conversation turns to a competitively sensitive topic like pricing strategies, put a stop to it. Make it clear that the discussion is inappropriate, then remove yourself from the situation and report the incident to your leader and the Legal Department immediately.

**Gather competitive information the right way.** Seek out competitive information through public sources, such as news feeds, industry stories, public-facing websites and unsolicited customer feedback – never through deception, misrepresentation, theft or other illegal or unethical means.



### Make It Happen!

Know the kinds of agreements that can violate the law – don't discuss or agree with competitors, customers or business partners to:

- Raise, set or hold ("fix") prices
- Divide up territories, markets or customers
- Refuse to deal with a particular competitor, supplier or customer
- Prevent a company from entering the market
- Interfere with – or influence the outcome of – a competitive bidding situation



### Want to Know More?



Fair Competition Policy

Competitive Intelligence Policy

# Insider Trading

**We don't trade on inside information or tip others so they may trade. Insider trading is illegal.**

As employees of Sunbelt Rentals, we're often "insiders" with material, nonpublic information about our company or companies we do business with. We don't take advantage of our insider status by buying or selling stock based on what we know. Insider trading gives investors an unfair advantage and is a serious crime.



## What This Means for You

**Know what's meant by the term "inside information."** It's information that isn't known by the public, but if it were, might influence someone to buy, sell or hold securities. Trading based on inside information is called insider trading.

**Don't "tip."** Passing along information to others, like friends or family, so they may trade on inside information is another form of insider trading.

**Don't take a chance.** If you're not sure if information is considered inside information, ask before trading. If you're not sure if information has been released to the public, treat it as though it hasn't been. And if you are subject to a trading window or blackout period, don't trade until the restriction has been lifted.



## Want to Know More?

 [Insider Trading Policy](#)



## Did You Know?

Examples of "inside information" include unpublished information about ...

- The gain or loss of a large customer or supplier
- Financial earnings or losses
- Changes in executive leadership
- Litigation or pending lawsuits
- Potential mergers or acquisitions





# Public Communications and Social Media

## We want people to have accurate information about Sunbelt Rentals.

We're all fans of – and ambassadors for – the brand of Sunbelt Rentals. But having one voice when it comes to communicating with the media, government regulators and others is the best way to ensure we send an accurate, clear and consistent message. If you're contacted by someone outside of our company for information, refer them to the proper resource.

## What This Means for You

**Unless you're a designated spokesperson ...** Don't speak on our behalf. As someone on the frontlines of what we do every day, you may be eager to share your perspectives on our business or set the record straight if you see customer feedback on social media. But it's always better to rely on the experts to respond.

**Post responsibly.** If you refer to Sunbelt Rentals in your online or social media activity, let others know that any opinions you post represent your own thoughts and views, not those of our company. Never share or disclose confidential information about us, our customers or our business partners. And never post anything about your team members that could be considered harassing, bullying or abusive.



## Did You Know?

**Interact** is an engagement app that was launched to keep you connected to other team members and up to date on what's happening in Sunbelt Rentals locations all around the world.



## Want to Know More?

- ☐ Communications With the Public Policy
- ☐ Social Media Policy
- ☐ Confidential Information Policy
- ☐ Data Privacy Policy
- ☐ Discriminatory Harassment Policy

### Who to Contact For:

Inquiries from the media: <a href="#">Marketing Department</a>	Inquiries from analysts or investors: <a href="#">Finance Department</a>	Inquiries from attorneys, government officials or regulators: <a href="#">Legal Department</a>	Invitations to speak or present on behalf of Sunbelt Rentals: <a href="#">Marketing Department</a>	Complaints and employment litigation questions: <a href="#">Human Resources Department</a>
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# OUR COMMUNITIES

**WE'RE GOOD NEIGHBORS IN THE COMMUNITIES WHERE WE LIVE AND WORK.**



## IN THIS SECTION:

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- Stewardship and Sustainability
- Employee Relief Fund
- Volunteerism

# Stewardship and Sustainability

**Protecting the environment has always been an important part of how we work.**

Our business model is built on manufacturing less and sharing more! Renting and reusing equipment, instead of buying it, has always been an environmentally friendly strategy. But our commitment to preserving the planet goes even further – we’re constantly looking for ways to minimize our environmental impact. And there are things you can do to help.



## What This Means for You

**Find out more!** Decreasing our carbon intensity, expanding our range of environmentally friendly equipment, reducing waste to landfills and the water we use – you can explore these initiatives and everything else we’re doing in our [Responsible Business Report](#).

**Do your part.** Make sure you know and follow any environmental requirements that apply to your job and complete any required training. Share with your leader any ideas you have for how we, as a company, can further promote good stewardship of the earth, and immediately report any situation that could pose an environmental risk. Remember, we all can make a difference – in and out of the workplace – by reusing, reducing and recycling to conserve water, energy and paper and minimize waste.



## Did You Know?

Companies are increasingly being asked, “What are you doing to help solve challenges facing the planet?” Our “ESG” (environmental, social and governance) program is our answer to that question. It outlines initiatives we’re undertaking and targets we’re focusing on. We know that progress will take more than words, data and reports – it takes actions and results. And we’re ready. It’s our goal to be a global leader in all things ESG. [Learn more.](#)

# Employee Relief Fund

**Our Employee Relief Fund supports team members who have experienced a catastrophic event.**

We not only lend a hand to aid in relief efforts and help communities rebuild in time of need, but we also reach out to Sunbelt Rentals family members who are facing financial hardships after a natural disaster or other life-changing event.

## What This Means for You

**All team members are eligible.** If you or an immediate dependent have been the victim of a natural disaster (such as a hurricane or flood) or a catastrophic event (such as a fire, terminal illness or severe car accident) and need help beyond your existing resources, email [employeereleiefund@sunbeltrentals.com](mailto:employeereleiefund@sunbeltrentals.com). Refer to the Plan Document for a full description of this program.

**Anyone can contribute.** Both team members and non-employees may contribute to the fund. Contributions are tax deductible as this is a 501(c)(3) non-profit organization. The Employee Relief Fund is operated and managed independent of executive direction or control of Sunbelt Rentals. If you or someone you know would like to pitch in, email [employeereleiefund@sunbeltrentals.com](mailto:employeereleiefund@sunbeltrentals.com).

## Want to Know More?

 [Employee Relief Fund Policy](#)



### Did You Know?

Since its establishment in 2004, our Employee Relief Fund has helped countless team members and their immediate family members.



# Volunteerism

**We believe in giving back: offering up our time, talents and financial commitments.**

Our passion for problem-solving goes beyond our day-to-day work – it extends to partnering with organizations to make a difference. From supplying equipment to veterans, first responders and families in need to supporting the humanitarian needs of the Red Cross, we’re on it. And we encourage team members to join us or volunteer with organizations that matter most to them.

## What This Means for You

**Corporate responsibility is part of our culture.** We’re proud to be known as a socially responsible company. You’re welcome and encouraged (but not required) to get involved in the [many initiatives we support](#) or lend your support to a 501(c)(3) charity that speaks to you. Sunbelt Rentals will provide any team member who wants to volunteer, a paid eight-hour day per anniversary year to make a positive impact. Talk with your leader and check our policies to understand how the program works and to determine eligibility.

**Be a force for good, but ...** Make sure that any personal volunteer activities you do or contributions you make are lawful and don’t create a conflict of interest with the work you do for us. Unless you have approval in advance, please don’t use our company’s name, funds or resources to support your personal charitable activities.

**Political activities?** As a government contractor, we do not provide support to any candidate or campaign and are prohibited from making corporate political contributions (or reimbursing you for ones you make). But we celebrate your participation in an individual capacity so long as you don’t involve the Sunbelt Rentals brand. As with personal charitable activities, make sure you volunteer on your own time and use your own resources. Make it clear that any views you express are yours alone and not those of Sunbelt Rentals.

## Want to Know More?

- Volunteerism Policy
- Government Contracting Policy
- Corporate Image Policy
- No Solicitation/No Distribution Policy



# Policy Reference

Following is an alphabetical list of all policies referenced in our Code, for easy access. Note that this isn't a comprehensive list of our policies.

## Manuals and Standards

Sunbelt Rentals Policy  
& Procedure Manual

Sunbelt Rentals Safety Standards

## Policies – all are located in our Handbook

Accommodations for Disabilities  
or Religious Purposes Policy

Affirmative Action Policy

Biometric Information Policy

Business & Travel Expenses Policy

Commercial Contracting Policy

Communications With the Public Policy

Company-Issued Credit Cards Policy

Company Vehicle Policy

Competitive Intelligence Policy

Compliance With Executive Order  
11246 and Other Statutes Policy

Confidential Information Policy

Conflicts of Interest Policy

Corporate Image Policy

Data Privacy Policy

Desktop and Laptop Computers Policy

Disciplinary Action Policy

Discriminatory Harassment Policy

Diversity & Inclusion Policy

Driving With Mobile Devices Policy

Electronic Communication  
Systems Acceptable Use Policy

Eligibility for Employment Policy

Employee Fraternalization Policy

Employee Records Policy

Employee Relief Fund Policy

Employer Property Policy

Employment of Relatives/Nepotism Policy

Equal Employment Opportunity Policy

Ethics Policy

Exempt Employees Policy

Fair Competition Policy

Fair Labor Standards Act (FLSA) Policy

Fraud Policy

Fuel Cards Policy

General Harassment & Bullying Policy

Gifts/Bribes/U.K. Bribery Act Policy

Government Contracting Policy

Grievance Policy

Housekeeping Policy

Insider Trading Policy

Inventions/Intellectual Property Policy

Meal Breaks & Rest Periods Policy

Minimum Age Requirements Policy

Mobile Devices & Other  
Electronic Devices Policy

No Solicitation/No Distribution Policy

Non-Exempt Employees Policy

Overtime Pay Policy

Personal Telephone Calls,  
Mail and Email Policy

Pregnancy Fairness Policy

Preservation of Evidence Policy

Privacy Protection for  
Social Security Numbers Policy

Reporting Your Concerns Policy

Safety Rules and Regulations Policy

Salaried Non-Exempt Employees Policy

Separation From the Company Policy

Serious Traffic Violations Policy

Sexual Harassment Policy

Social Media Policy

Substance Abuse Policy

Timekeeping Policy

Use of Marijuana Policy

Use of Personal Cell Phones  
and Other Electronic Devices Policy

Use of Prescription or  
Legal Non-Prescription Drugs Policy

Use of Rental Equipment Policy

Volunteerism Policy

Weapons Policy

Whistleblower Policy

Working Remote Policy

Workplace Violence Policy

# Helpful Resources

Contact
Human Resources Department
Legal Department
Performance Standards Department
Marketing Department
Finance Department
The toll-free Sunbelt Rentals <b>HR Helpline</b> (for any employment-related or Team Member Handbook questions)
<b>The Independent Compliance Hotline</b> (for any Code of Conduct concern or question)
Employee Assistance Program

Any waiver of our Code for executive officers or directors may be made only by the Board of Directors or a Board committee and will be promptly disclosed to shareholders as required. Any waiver of our Code for any other employee may be made only by the Legal Department.

Sunbelt Rentals supports an employee's right to speak out publicly about matters of public concern and to participate in concerted activities and communications related to terms and conditions of employment. Nothing in any section of our Code or in any of our policies is intended to limit or interfere with that right.

