

# Sunbelt Rentals Supplier Code of Ethics

## COMPLIANCE WITH THE LAW AND THIS CODE

Suppliers and, where applicable, their manufacturing facilities must as a minimum fully comply with all applicable federal, state, provincial and/or local laws and regulations, including, but not limited to, those dealing with labor, immigration, health and safety, and the environment. Where provisions in this Code address topics covered by laws, the applicable code that affords the greatest protection to the individual should be applied.

## VOLUNTARY LABOUR

All direct and supply chain labor must be voluntary – this includes Sunbelt Rentals' employees, contractors, agency workings, suppliers and consultants.

The use of trafficked, coerced, slave, indentured, prison, child, underage or any other form of forced labor is strictly prohibited. Recruitment based on threat, force, coercion, or fraud is also prohibited. Workers will not be required to provide “deposits” in order to secure employment, and the holding of worker identity or immigration papers (including but not limited to passports, work permits, or travel documents), or destroying, concealing, confiscating or otherwise denying worker's access to such documents is also prohibited. Workers must be free to resign their employment in accordance with applicable laws or regulations without unlawful penalty.

Suppliers are responsible for ensuring modern slavery and human trafficking are not taking place in their business or within their supply chain.

## PREVENTION OF UNDERAGE LABOUR

Suppliers must ensure that every worker is at least 15 years of age and meets the applicable legal minimum age requirement, if the minimum age is higher under local law. Workers under age 18 may not perform hazardous work and must be restricted from night work. In certain cases where allowable by the Fair Labor Standards Act (FLSA) in the United States the minimum age for workers may be 14 years of age, but only following FLSA guidelines and working hour restrictions.

Suppliers must also maintain copies of official documentation for every worker that verifies the worker's date of birth. In those countries where official documents are not available to confirm exact dates of birth, the Supplier must confirm ages using appropriate and reliable assessment methods.

Where applicable, suppliers should participate in and contribute to policies and programs which provide for the transition of any child found to be performing child labor to enable that child to attend and remain in quality education until no longer a child. Any relevant actions taken in this regard should be consistent with the provisions of International Labour Organisation Convention 138 and the United Nations Convention on the Rights of the Child.

## HIRING AND EMPLOYMENT PRACTICES

Suppliers' hiring practices must include verification of workers' legal right to work in the country and ensure that all mandatory documents, such as work permits, are available for confirmation. Workers should be provided

with written and understandable information about their employment, including conditions of employment, wages, pay periods and benefits.

Suppliers must prohibit discrimination in recruiting, hiring, wages, benefits and other forms of compensation, access to training, promotion terms and conditions of employment, termination or retirement based on race, color, religion, gender, nationality, age, disability, union membership, maternity, sexual orientation, marital status, or other protected status.

Suppliers must also ensure compliance with applicable labor and social security laws and regulations related to regular employment relationships. Examples include regulations related to labor only contracting and sub-contracting, home-working arrangements, abuse of apprenticeship schemes, and excessive repetition of fixed term contracts.

## **LABOUR HOURS AND COMPENSATION**

Suppliers must comply with applicable wage and hour labor laws and regulations governing employee compensation and working hours, while meeting or exceeding legal standards for minimum wages, overtime premiums, and statutory benefits. Suppliers should ensure workers receive equal compensation for work of equal value. Wages should not be paid in kind. Suppliers must ensure wages are paid on time, working hours are not excessive and overtime is voluntary and paid at a premium rate in accordance with governing law or applicable collective bargaining agreements. Workers should not be required to work in excess of 48 hours per week on a regular basis and should be provided with at least one day off every seven-day period on average.

## **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

Suppliers must respect the right of workers to choose whether to lawfully and peacefully form or join trade unions of their choosing and to bargain collectively. Workers' representatives must not be discriminated against and must have access within with workplace to engage in their representative functions.

## **HARASSMENT**

Suppliers should foster an inclusive and welcoming working environment that is free from harassment and discrimination. Suppliers may not subject workers to physical, sexual, psychological, or verbal harassment or abuse. Suppliers must not engage in, support or permit harassment or discrimination based on race, color, religion, gender, nationality, age, disability, union membership, veteran status, pregnancy, sexual orientation, marital status or other characteristics protected by applicable law. Suppliers may not use monetary fines to discipline employees and any disciplinary measures should be recorded in writing. Suppliers must have a system that allows employees to anonymously report their concerns without fear of retaliation.

## **HEALTH AND SAFETY**

Suppliers, in adherence to applicable laws, must provide all workers with a safe and healthy work environment. Suppliers must take proactive measures to prevent workplace hazards and protect workers and others, including members of the public, from any hazards associated with the company's operations, products and services.

Workers should have access to clean toilet facilities and drinkable water. Housing or other accommodation, where provided, should be clean, safe and meet the basic needs of workers.

## **ENVIRONMENT**

Suppliers must ensure that every facility complies with applicable environmental laws, including all laws related to waste disposal, air emissions, discharges, toxic substances and hazardous waste disposal. Suppliers should actively work to prevent pollution and minimize energy and material usage, reduce the production of waste, and ensure effective and responsible waste management and disposal. Specifically, suppliers must validate that all input materials and components were obtained in accordance with international treaties and protocols in addition to local laws and regulations.

## **TRAINING AND AWARENESS**

Suppliers must provide employees with the necessary information, instruction, training and guidance needed to ensure safe, responsible and compliant operations, and to promote compliance with this Code and the provisions contained herein.

## **GIFTS AND IMPROPER PAYMENT**

Suppliers may not give gifts to Sunbelt Rentals' employees, as bribes, kickbacks or in exchange for business opportunities.

## **ANTI-CORRUPTION**

Sunbelt Rentals is committed to complying with the U.S. Foreign Corrupt Practices Act and the anti-corruption and anti-money laundering laws of the countries in which we operate, including the U.K. Bribery Act. Suppliers must also comply with these laws and may not participate in bribes or kickbacks of any kind, whether in dealings with government officials or entities and/or individuals in other sectors.

## **CONFLICTS OF INTEREST**

All suppliers must comply with laws regarding conflicts of interest and fair competition.

## **CONFIDENTIAL INFORMATION**

Suppliers must protect all Sunbelt Rentals information, electronic data, and intellectual property with appropriate safeguards. Supplier shall only use Sunbelt Rentals' confidential information for the purposes specified by Sunbelt Rentals. Any transfer of confidential information must be executed in a secure way. Suppliers may not use the Sunbelt Rentals trademark, images, or other materials to which Sunbelt Rentals owns the copyright, unless authorized in writing. If a Supplier becomes aware of a data breach or potential breach that impacts Sunbelt Rentals or the security of Sunbelt Rentals' operations or data, such Supplier must immediately contact Sunbelt Rentals (see contact information below). Suppliers are expected to adhere to any applicable regulatory, contractual or other obligations or standards of cybersecurity applicable to their business or operations.

In order to support and evaluate its suppliers, Sunbelt Rentals may engage in monitoring activities to assess compliance with this Code of Ethics. Suppliers who do not meet the requirements of this Code may be provided with the opportunity to bring their business up to the Sunbelt Rentals standards in a reasonable timeframe. Sunbelt Rentals reserves the right to terminate its business relationship with any supplier who fails to do so or refuses to comply with the Supplier Code of Ethics.

Any person who believes that a violation of the Sunbelt Rentals Supplier Code of Ethics has occurred is asked to report the relevant information in confidence to the Sunbelt Rentals Compliance Hotline at 844-960-0579 in the United States, Canada, or the United Kingdom.

Supplier Name:

Respondent Signature:

Respondent Printed Name:

Date: