



## **ANNUAL REPORT ON THE PREVENTION AND REDUCTION OF RISKS OF FORCED LABOUR AND/OR CHILD LABOUR IN SUPPLY CHAINS**

Prepared pursuant to the *Fighting Against Forced Labour in Supply Chains Act*, S.C. 2023, c. 9

**Legal Name of Reporting Entity/Entities:**

Sunbelt Rentals of Canada Inc. and William F. White International Inc.

**Date of Report:** 21 April 2025

**Financial Reporting Year:** 2024

**1. What steps has the entity taken in the previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity?**

Sunbelt Rentals of Canada Inc. and William F. White International Inc. (collectively, “Sunbelt”) are committed to preventing and reducing the risk that forced labour and child labour are used in its supply chain. Our Modern Slavery Statement affirms our commitment. See Appendix A, Modern Slavery Statement. Though we consider our business to be low-risk regarding forced or child labour due to the nature and location of our operations and supply chains, we pay particular attention to instances where the risks may be elevated and take affirmative steps to evaluate any human rights risks in our supply chain.

In North America, we work with our suppliers to ensure compliance with the Sunbelt Rentals Supplier Code of Ethics, which requires that all direct and supply chain labour be voluntary and of the appropriate age. See Appx. B, Sunbelt Rentals Supplier Code of Ethics. Sunbelt strictly prohibits the use of any trafficked, coerced, enslaved, indentured, or underaged labour. Additionally, our companies require compliance with the Ethical Sourcing Policy and Business Ethics and Conduct Policy. See Appx. C, Ethical Sourcing Policy; Appx. D, Business Ethics and Conduct Policy. These policies set forth our expectations and requirements of freely chosen employment, safe working conditions, and prohibition of child labour. As part of these efforts and expectations, Sunbelt conducts a Supplier Assessment to review our suppliers’ principles, objectives, and business to ensure that the supplier aligns with our Supplier Code of Ethics. This Supplier Assessment looks to establish and understand policies around employee health and safety, human rights, working and labor conditions and environmental management. Suppliers are required to report any violations and Sunbelt reserves the right to audit our suppliers and require corrective actions should Sunbelt discover non-compliance with any policies. Sunbelt also conducts periodic reviews of its suppliers to ensure compliance with our policies. To the extent any issues are identified with any of Sunbelt’s suppliers, Sunbelt would endeavor to remediate those issues.

Sunbelt also requires its workforce to participate in human rights trainings through our internal learning management system. All employees are required to take Code of Conduct training. We also provide a number of managers and various support employees – including fleet operations and product procurement and support employees – access to human trafficking and modern slavery in supply chains training upon hire and every two years after hire. Sunbelt also provides all employees a channel to report any suspected violations of Sunbelt’s policies.

See Appx. A; see also Appx. E, Modern Slavery and Human Trafficking Policy. These multiple reporting channels, in addition to initial and continuing review of supplier compliance with our policies, are designed to prevent and reduce the risk that forced labour or child labour is used in our supply chain.

**2. Please provide additional information describing the steps taken (if applicable).**

Please refer to our due diligence process in questions 7.

**3. Which of the following accurately describes the entity's structure?**

- Corporation
- Trust
- Partnership
- Other unincorporated organization

**4. Which of the following accurately describes the entity's activities? (select all that apply)**

- Producing goods (including manufacturing, extracting, growing and processing)
  - in Canada
  - outside Canada
- Selling goods
  - in Canada
  - outside Canada
- Distributing goods
  - in Canada
  - outside Canada
- Importing into Canada goods produced outside Canada
- Controlling an entity engaged in producing, selling or distributing goods in Canada or outside Canada, or importing into Canada goods produced outside Canada

**5. Please provide additional information on the entity's structure, activities and supply chains.**

Sunbelt Rentals of Canada Inc. is incorporated in British Columbia. William F. White International Inc. is incorporated in Ontario. These entities are sister corporations, as both are subsidiaries of Ashtead Group plc, a London, a public limited company incorporated in England and Wales ('the Company', and together with its subsidiaries, 'the Group'). Both Canadian entities are managed autonomously by their senior executive management teams. Our companies are leaders in the equipment rental industry with a vast network of locations across Canada and an expansive portfolio of equipment-related and film-related products and services. Sunbelt rents its products to a diverse customer base throughout Canada. Sunbelt currently operates in the following provinces: Alberta, British Columbia, Manitoba, New Brunswick, Nova Scotia, Ontario, Quebec, and Saskatchewan.

While the Group sources goods and services from a wide range of suppliers, the Group predominately works with a number of major equipment suppliers of which the majority are based in North America and Europe. The Group primarily buys new equipment from vendors with strong reputations for product quality and reliability. Major suppliers to our Canadian businesses can be seen below:

Business areas include:	General equipment Power and HVAC Climate control Flooring Solutions Film & TV
Major suppliers	Dams Ford Lincoln JCB JLG Industries Kubota Skyjack Terex Wacker Neuson

Outside of the Group’s expenditure on equipment, its key expenditure relates to its workforce and goods and services procured locally to its stores.

The Group believes that there is a low risk of modern slavery due to the nature and location of the Group’s operations and its supply chain. Nevertheless, the Group remains cognisant of the risks of modern slavery and seeks to continuously enhance its due diligence processes. As a result, the Group is paying particular attention to those parts of our business where we have a higher reliance on temporary labour where we believe the risks of modern slavery may be higher.

**6. Does the entity currently have policies and due diligence processes in place related to forced labour and/or child labour?  Yes  No**

*If yes: Which of the following elements of the due diligence process has the entity implemented in relation to forced labour and/or child labour? (select all that apply)*

- Embedding responsible business conduct into policies and management systems
- Identifying and assessing adverse impacts in operations, supply chains and business relationships
- Ceasing, **preventing** or mitigating adverse impacts
- Tracking implementation and results
- Communicating how impacts are addressed
- Providing for or cooperating in remediation when appropriate

**7. Please provide additional information on the entity's policies and due diligence processes in relation to forced labour and child labour (if applicable).**

The Group's Modern Slavery and Human Trafficking, Business Ethics and Conduct and Ethical Sourcing policies set out the Group's commitment to the highest standards of ethical behaviour and require that business relationships and supply chains are managed in line with those values. These policies set out the Group's expectation that, at a minimum, its suppliers comply with all national laws but where the provisions within the Group's policies address the same subject, the provision that affords the greatest protection to the individual should be applied. The Group's policies include its commitment that the Group's businesses and their supply chains are free from modern slavery and human trafficking.

In North America, the business works with its suppliers to ensure compliance with the Sunbelt Rentals Supplier Code of Ethics, a copy of which is available on the Sunbelt Rentals North American website (Supplier Code of Ethics).

The Group has maintained long-term relationships with its key suppliers, most of whom are based in North America and Europe, and have made them aware of our expectations regarding ethical business practices.

No modern slavery or human trafficking has been identified within our supply chain in the year. Nevertheless, if evidence of modern slavery or human trafficking were found within any of the Group's suppliers, action would be taken to work with the supplier to understand the situation and ensure corrective actions are taken. Where such actions were not implemented, the relationship with the supplier would be terminated.

**8. Has the entity identified parts of its activities and supply chains that carry a risk of forced labour or child labour being used?**

- Yes, we have identified risks to the best of our knowledge and will continue to strive to identify emerging risks.
- Yes, we have started the process of identifying risks, but there are still gaps in our assessments.
- No, we have not started the process of identifying risks.

*If yes: Has the entity identified forced labour or child labour risks related to any of the following aspects of its activities and supply chains? (select all that apply.)*

- The sector or industry it operates in
- The types of products it produces, sells, distributes or imports
- The locations of its activities, operations or factories
- The types of products it sources
- The raw materials or commodities used in its supply chains
- Tier one (direct) suppliers
- Tier two suppliers
- Tier three suppliers
- Suppliers further down the supply chain than tier three
- The use of outsourced, contracted or subcontracted labour

- The use of migrant labour
- The use of forced labour
- The use of child labour
- None of the above
- Other, please specify: [Click or tap here to enter text.](#)

**9. In which sectors or industries has the entity identified forced labour or child labour risks?**

We are not aware of any forced labour, child labour, modern slavery or human trafficking within our supply chain in the year.

Sunbelt believes there is a low risk of forced labour or child labour in our supply chain due to the nature and location of our operations and direct supply chains. Nevertheless, we remain cognisant of the risks of modern slavery and seek to continuously enhance our due diligence processes.

The Group is paying particular attention to those parts of our business where we have a higher reliance on temporary labour where we believe the risks of modern slavery may be higher. We also pay attention to risks of improper and unfair labour further down the supply chain where there may be a heightened risk in particular around the sourcing of inputs and materials used by manufacturers, such as those involved in the mining of minerals and metals.

**10. Please provide additional information on the parts of the entity's activities and supply chains that carry a risk of forced labour or child labour being used, as well as the steps that the entity has taken to assess and manage that risk (if applicable).**

We engage in ongoing processes to mitigate, alleviate, and minimize risk related to forced labour and child labour, and we are continuously improving our ability to identify risk down the supply chain to further minimize any gaps.

All staff joining the Group are subject to an onboarding process with relevant 'right to work' or other checks as appropriate to the jurisdiction undertaken. This process includes checks where candidates' references are obtained and there is a verification of their employability status. External agencies used to source temporary labour are expected to follow similar processes and are subject to the Group's normal supplier onboarding processes. The Group does not charge recruitment fees, either directly or indirectly, to candidates as part of the recruitment process.

In North America, the business works with its suppliers to ensure compliance with the Sunbelt Rentals Supplier Code of Ethics, a copy of which is available on the Sunbelt Rentals North American website (Supplier Code of Ethics).

**11. Has the entity taken any measures to remediate any forced labour or child labour in its activities and supply chains?**

- Yes, we have taken remediation measures and will continue to identify and address any gaps in our response.
- Yes, we have taken some remediation measures, but there are gaps in our response

that still need to be addressed.

No, we have not taken any remediation measures.

Not applicable, we have not identified any forced labour or child labour in our activities and supply chains.

*If yes: Which remediation measures has the entity taken?*

Not applicable.

**12. Please provide additional information on any measures the entity has taken to remediate any forced labour or child labour (if applicable).**

Not applicable.

**13. Has the entity taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains?**

Yes, we have taken substantial remediation measures and will continue to identify and address any gaps in our response.

Yes, we have taken some remediation measures, but there are gaps in our response that still need to be addressed.

No, we have not taken any remediation measures.

Not applicable, we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

**14. Please provide additional information on any measures the entity has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains (if applicable).**

Not applicable.

**15. Does the entity currently provide training to employees on forced labour and/or child labour?**  Yes  No

*If yes: Is the training mandatory?*

Yes, the training is mandatory for all employees.

Yes, the training is mandatory for employees making contracting or purchasing decisions.

Yes, the training is mandatory for some employees.

No, the training is voluntary.

**16. Please provide additional information on the training the entity provides to employees on forced labour and child labour (if applicable).**

Our employees are required to participate in numerous trainings through our learning management system. Upon hire, all employees are required to take training related to our Code of Conduct, which includes information regarding Sunbelt’s human rights policies. Our Code of Conduct emphasizes Sunbelt’s commitment to respecting and protecting human rights, including prohibiting forced labor and committing to payment of fair wages, and the training elaborates on our team members’ responsibility to exercise due diligence to ensure our third-party vendors meet the same standards and expectations.

Sunbelt also provides additional training for managers and various support employees – including fleet operations and product procurement and support employees – to engage in human trafficking and modern slavery in supply chains training upon hire and every two years after hire.

**17. Does the entity currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains?  Yes  No**

*If yes: What method does the entity use to assess its effectiveness?*

To assess our companies’ policies and procedures in place to ensure that forced labour and child labour are not being used in its activities and supply chains, Sunbelt conducts a review of our supplier base. Further, we require our existing suppliers to reaffirm their compliance with our Modern Slavery, Ethical Sourcing, and Business Ethics and Conduct policies on an ongoing basis.

Our entities are also requiring our suppliers to complete a Supplier Assessment related to sustainability that specifically asks about their policies and protocols relating to labour and human rights issues. Suppliers must complete the assessment and evaluate their compliance with the Sunbelt Rentals Supplier Code of Ethics.

**18. Please provide additional information on how the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains (if applicable).**

Please see the response to Question 17. To date, Sunbelt has not identified any violations of its policies prohibiting forced labour and child labour.

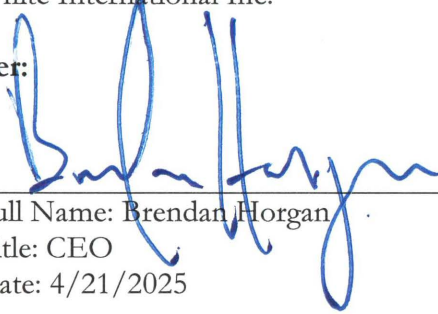
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**Approval and Attestation:**

In accordance with the requirements of the *Fighting Against Forced Labour in Supply Chains Act*, S.C. 2023, c. 9, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.

Sunbelt Rentals of Canada Inc. and William F.  
White International Inc.

**Per:**



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Full Name: Brendan Horgan  
Title: CEO  
Date: 4/21/2025

I have the authority to bind Sunbelt Rentals of  
Canada Inc. and William F. White International  
Inc.

# APPENDIX A



## ASHTEAD GROUP PLC MODERN SLAVERY STATEMENT

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Through its subsidiaries, Ashtead Group plc (“Ashtead” or the “Group”) provides equipment rental in the US, Canada and the UK, trading under the name Sunbelt Rentals. The Group rents a full range of construction and industrial equipment across a wide variety of applications to a diverse customer base. Behaving in a responsible way is embedded in Ashtead’s culture, reflects the needs of all its stakeholders and underpins the long-term sustainability of its business and financial performance.

### **Statement of commitment**

Ashtead takes its social responsibility seriously and is committed to conducting its business in compliance with the highest ethical standards. The Group’s policies are designed to prevent the occurrence of modern slavery or human trafficking in any part of its business or in its supply chain. This statement applies to all persons who act on behalf of its business in any capacity, including employees, directors, consultants, contractors and agency workers; and its supply chain.

This statement is made by Ashtead on behalf of its relevant subsidiaries<sup>1</sup>, pursuant to section 54(12) of the Modern Slavery Act 2015 and constitutes the Group’s slavery and human trafficking statement for the financial year ended 30 April 2024.

### **Ashtead’s business and supply chain**

Ashtead operates national networks in the US, UK and Canada through c. 1,500 rental stores with over 25,000 employees. It supplies over 900,000 customers who range in size and scale from multi-national businesses, through strong local contractors to individual do-it-yourselfers. The diversified customer base includes construction, industrial and homeowner customers, service, repair and facility management businesses, emergency response organisation, as well as government entities such as municipalities and specialist contractors.

The Group’s business is conducted through the following businesses:

- Sunbelt Rentals, Inc. is the Group’s US based equipment rental business with 1,215 stores across all 50 states and the District of Columbia. The Group derives approximately 85% of its revenue from its US business. The Group also generates revenue in the Bahamas under the management of its US business;
- Sunbelt Rentals of Canada, Inc. and William F. White International, Inc. are the Group’s Canadian based businesses through which it rents construction and industrial equipment together with a specialism in renting equipment to the film industry with 138 stores across eight provinces in Canada. The Group derives approximately 6% of its revenue from its Canadian businesses; and
- Sunbelt Rentals Limited is the Group’s UK based business which rents a broad range of equipment, to a varied customer base. It operates 190 stores nationwide and generates approximately 9% of Group revenue. The Group also generates revenue in Germany, France and the Republic of Ireland under the management of its UK business.

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<sup>1</sup> Modern slavery statement specifically covers Ashtead Group plc, Ashtead Holdings PLC and Sunbelt Rentals Limited.

While the Group sources goods and services from a wide range of suppliers, the Group predominately works with a number of major equipment suppliers of which the majority are based in North America and Europe. The Group primarily buys new equipment from vendors with strong reputations for product quality and reliability.

The table below highlights the Group's key suppliers:

	<b>US</b>	<b>Canada</b>	<b>UK</b>
Business areas include:	General equipment Power and HVAC Pump Solutions Scaffold services Climate control Flooring Solutions	General equipment Power and HVAC Climate control Flooring Solutions Film & TV	General equipment Accommodation Power Temporary roadway and barriers Traffic Management
Major suppliers in FY24	Clark Equipment JCB JLG Industries John Deere Pritchard Auto Multiquip Terex	Dams Ford Lincoln JCB JLG Industries Kubota Skyjack Terex Wacker Neuson	Doosan Bobcat Hydro JCB Leica Press Metal McElroy Thurston

In North America, the five largest equipment manufacturers from which Sunbelt Rentals purchases equipment are Clark Equipment, JCB, JLG Industries, John Deere and Terex. These suppliers accounted for approximately 50% of Sunbelt Rentals North American capital expenditure in year ended 30 April 2024.

The five largest equipment manufacturers from which Sunbelt UK purchases equipment are Doosan Bobcat, JCB, Leica, Press Metal and Thurston. These suppliers accounted for approximately 35% of Sunbelt UK's capital expenditures in year ended 30 April 2024.

Outside of the Group's expenditure on equipment, its key expenditure relates to its workforce and goods and services procured locally to its stores.

### **Group policies**

The Group's Modern Slavery and Human Trafficking, Business Ethics and Conduct and Ethical Sourcing policies set out the Group's commitment to the highest standards of ethical behaviour and require that business relationships and supply chains are managed in line with those values. These policies set out the Group's expectation that, at a minimum, its suppliers comply with all national laws but where the provisions within the Group's policies address the same subject, the provision that affords the greatest protection to the individual should be applied. The Group's policies include its commitment that the Group's businesses and their supply chains are free from modern slavery and human trafficking.

Relevant policies are summarised below:

- Modern Slavery and Human Trafficking policy – the Group's modern slavery and human trafficking policy sets out its commitment to safeguarding against modern slavery within its own business or in any of its supply chains. The policy is available on the Group's website ([Modern slavery and human trafficking policy](#));

- Business Ethics and Conduct policy – the Group’s business ethics and conduct policy sets out its expectation for the Group and its employees. The policy specifically addresses the topics of fair competition, health and safety, environmental matters, equal opportunities, confidentiality and whistleblowing. The policy is available on the Group’s website ([Business Ethics and Conduct Policy](#)); and
- Ethical Sourcing policy – the Group’s ethical sourcing policy sets out its expectation for suppliers and specifically addresses the topics of freely chosen employment, freedom of association and right to collective bargaining, working conditions, child labour, wages, working hours, discrimination, regular employment and treatment of employees. The policy is available on the Group’s website ([Ethical sourcing policy](#)).

The Group’s policies are reviewed formally by the Board on an annual basis to ensure that they remain appropriate.

### **Governance**

The Group’s Board of directors is responsible for setting the Group’s strategy around modern slavery and human trafficking. They have authority over decision making and have overall responsibility for the policies outlined above.

### **Risk Assessment**

The Group believes that there is a low risk of modern slavery due to the nature and location of the Group’s operations and its supply chain. Nevertheless, the Group remains cognisant of the risks of modern slavery and seeks to continuously enhance its due diligence processes. As a result, the Group is paying particular attention to those parts of our business where we have a higher reliance on temporary labour where we believe the risks of modern slavery may be higher, such as in our scaffold business in North America or our traffic management business in the UK.

### **Due diligence and monitoring of suppliers**

The greatest proportion of the Group’s expenditure relates to its investment in rental equipment. Across the Group’s supply chain, due diligence is undertaken before entering into a supply arrangement for rental equipment providing the Group with an opportunity to assess the supplier.

In North America, the business works with its suppliers to ensure compliance with the Sunbelt Rentals Supplier Code of Ethics, a copy of which is available on the Sunbelt Rentals North American website ([Supplier Code of Ethics](#)). In the UK, relevant policies are provided to suppliers as part of the supplier on-boarding process. As part of the on-boarding process, suppliers are required to confirm compliance with the Group’s policies.

Furthermore, on an ongoing basis existing suppliers are monitored to confirm compliance with the Group’s Modern Slavery, Ethical Sourcing and Business Ethics and Conduct policies. The Group’s risk-based approach ensures that it focuses its efforts on those suppliers which are material to the Group or assessed as higher risk.

The Group has maintained long-term relationships with its key suppliers, most of whom are based in North America and Europe, and have made them aware of our expectations regarding ethical business practices.

No modern slavery or human trafficking has been identified within our supply chain in the year. Nevertheless, if evidence of modern slavery or human trafficking were found within any of the Group’s suppliers, action would be taken to work with the supplier to understand the situation and ensure corrective actions are taken. Where such actions were not implemented, the relationship with the supplier would be terminated.

## **Recruitment and our employees**

The Group has over 25,000 employees, c. 75% of which are based in US, c. 10% of which are based in Canada, and c. 15% are based in UK and Europe.

All staff joining the Group are subject to an onboarding process with relevant 'right to work' or other checks as appropriate to the jurisdiction undertaken. This process includes checks where candidates' references are obtained and there is a verification of their employability status. External agencies used to source temporary labour are expected to follow similar processes and are subject to the Group's normal supplier onboarding processes.

The Group does not charge recruitment fees, either directly or indirectly, to candidates as part of the recruitment process.

## **Training**

Senior employees across the Group receive regular business ethics training to ensure that they are aware of their obligations and responsibilities with regards to competing fairly. This takes place every two years in North America, and was undertaken in FY 2024, and annually in the UK. Furthermore, in the UK, relevant employees also receive specific training related to modern slavery. Similar training for relevant employees in North America is delivered every two years.

Completion of training is monitored and reported to the Board by the Group's Risk Committee.

## **Whistleblowing**

Ashtead operates a fully confidential third-party operated whistleblowing service for all employees and third parties to raise any concerns that they may have. Whistleblowing matters may be reported via the whistleblowing lines detailed within the Group's [Modern slavery and human trafficking policy](#) or directly to either Ashtead's General Counsel ([lynne.fuller-andrews@sunbeltrentals.com](mailto:lynne.fuller-andrews@sunbeltrentals.com) or +1 803-578-5911) or Company Secretary ([aporter@ashtead-group.com](mailto:aporter@ashtead-group.com) or +44 20 7726 9740).

Ashtead Group's General Counsel will investigate all reports of illegal, dishonest, harmful or unethical activity and report all such allegations and results of subsequent investigations to the Group's board of directors.

More details on this process are provided in the Group's Business Ethics and Conduct policy.

## **Focus for the year ahead**

Ashtead understands that the risks associated with modern slavery are constantly evolving and that it must continue to monitor and enhance its actions in this area.

In the year ahead, the Group's priority areas include:

- ongoing review of the Group's Modern Slavery and other relevant policies to ensure that they continue to consider and address the risks of modern slavery;
- continuing our relationship with Slave-Free Alliance to support our review of the risks of modern slavery;
- continued dialogue with the Group's suppliers in relation to modern slavery, rationalising our supply chain and extending the scope of our diligence and monitoring activities to service providers. Specifically, we

are working with the Group's major suppliers to reaffirm their compliance with our Modern Slavery, Ethical Sourcing and Business Ethics and Conduct policies;

- continuing focus on the Group's suppliers of temporary labour, with consideration of the policies and procedures in place to address the risks of modern slavery; and
- reinforce education and training of relevant employees across the Group to further enhance understanding of the risks of modern slavery within our business.

**Approval of this statement**

This statement has been approved by the Board and signed on its behalf by:

A handwritten signature in black ink, appearing to read 'Brendan Horgan', written in a cursive style.

Brendan Horgan  
Chief executive  
29 August 2024

# APPENDIX B

# 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:

# APPENDIX C

## **1. Application of the policy**

- 1.1 Suppliers must comply with all applicable laws and regulations.
- 1.2 The Group's expectation that, at a minimum, its suppliers comply with all national laws but that where the provisions within the Group's policies address the same subject, the provision that affords the greatest protection to the individual should be applied.

## **2. Freely chosen employment**

- 2.1 The supplier and any person supplying labour to the supplier shall not use and shall strictly prohibit forced, bonded (including debt bondage) labour, involuntary prison labour, slavery or trafficking of people. This includes transporting, harbouring, recruiting, transferring or receiving people by means of threat, force, coercion, abduction or fraud for labour services.
- 2.2 The supplier shall not require workers to lodge "deposits" or their identity papers with their employer and must be free to leave their employer after reasonable notice. The supplier must not charge the worker directly or indirectly for the cost of his or her recruitment. The supplier must accept the cost of recruitment as a business cost.

## **3. Freedom of association and the right to collective bargaining**

- 3.1 Workers have the right to join or form a trade union of their own choosing and where a significant proportion of the workforce agree, to bargain collectively.
- 3.2 Suppliers must adopt an open attitude towards activities of trade unions and their organisational activities.
- 3.3 Workers representatives must not be discriminated against and must have access in the workplace to carry out their representative functions.
- 3.4 Where the right to freedom of association and collective bargaining is restricted under national laws, the supplier should consider facilitating and not hindering the development of legal parallel means for independent and free association and bargaining.

#### 4. Working conditions

- 4.1 Suppliers shall provide a safe and healthy working environment. Bearing in mind international standards, the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working practices and environment.
- 4.2 Workers shall receive suitable and sufficient health and safety training, in order that they fully understand the hazards associated with the work activity and environment and the correct practices required to minimise risks.
- 4.3 Access to clean toilet facilities, drinkable water and, if appropriate sanitary facilities for storage shall be provided.
- 4.4 Accommodation, where provided, shall be clean, safe and meet the basic needs of workers.
- 4.5 The supplier shall assign responsibility for health and safety to a senior management representative.

#### 5. Child labour

- 5.1 The supplier must not use child labour<sup>1</sup>.
- 5.2 If a supplier discovers child labour in its operation it must notify the appropriate law enforcement bodies and Ashtead's General Counsel ([lynne.fuller-andrews@sunbeltrentals.com](mailto:lynne.fuller-andrews@sunbeltrentals.com) or +1 803-578-5911) or Company Secretary ([aporter@ashtead-group.com](mailto:aporter@ashtead-group.com) or +44 20 7726 9740) immediately. Immediate steps must be taken to eliminate such child labour in a manner consistent with the best interests of the child(ren) concerned.
- 5.3 Suppliers should develop or participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable him or her to attend and remain in quality education until no longer a child.
- 5.4 In any event, the course of action taken shall be in the best interests of the child and conform to the provisions of International Labour Organisation Convention 138 and be consistent with the United Nations Convention on the Rights of the Child.

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<sup>1</sup> UNICEF defines child labour as "a child is considered to be involved in child labour activities under the following classification:

- a) children 5 to 11 years of age that do one hour of economic activity or at least 28 hours of domestic work; and
- b) children 12 to 14 years of age that during the week preceding the survey did at least 14 hours of economic activity or at least 42 hours of economic activity and domestic work combined."

## **6. Wages**

- 6.1 Wages and benefits paid for a standard working week shall meet, as a minimum, national legal standards, including the right to equal remuneration for work of equal value.
- 6.2 In any event wages should not be paid in kind and should be enough to meet basic needs.
- 6.3 All workers should be provided with written and understandable information about their employment conditions in respect of wages before they enter employment and about the particulars of their wages for the pay period concerned each time they are paid.
- 6.4 Excessive deductions from wages as a disciplinary measure should not be permitted. Deductions from wages not provided for by national laws should only be permitted with the express permission (without duress) of the worker concerned. All disciplinary measures should be recorded in writing.

## **7. Working hours**

- 7.1 Standard working hours shall comply with national laws.
- 7.2 Workers shall not, on a regular basis, be required to work in excess of 48 hours per week and shall be provided with at least one day off every seven day period average. Overtime requested by the supplier shall be voluntary and a single request shall not cover multiple overtime requirements over a significant period unless the supplier is party to a collective agreement which requires overtime work in accordance with such agreement. Any such agreement must be freely negotiated with the worker organisation (as defined by the International Labour Organisation) and represent a significant portion of the workforce. Overtime shall always be compensated at a premium rate. As provided by ILO Convention 1, these provisions are intended to cover non-supervisory and non-management functions.

## **8. Discrimination**

A policy of equality must be in place and there should be no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

## **9. Regular employment**

- 9.1 To every extent possible, work performed must be on the basis of recognised employment relationships established through national law and practice.
- 9.2 Obligations to employees under labour or social security laws and regulations arising from regular employment relationships should not be avoided. Examples include the abuse of labour-only contracting, sub-contracting, or home-working arrangements, through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, or excessive repetition in the use of fixed term contracts of employment for a single individual.

## **10. Harsh or inhumane treatment**

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation are prohibited.

Approved by the Board of Ashtead Group plc  
Dated the 29 August 2024

# APPENDIX D



## ASHTEAD GROUP PLC BUSINESS ETHICS AND CONDUCT POLICY

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Ashtead Group plc and its subsidiary companies (“Ashtead”) believe that high standards of business ethics are critical in today’s business world. Ashtead therefore places a high priority on compliance with all applicable legislative and regulatory requirements and on the maintenance of high ethical standards.

Ethical conduct is a core value of Ashtead.

Ashtead has issued this policy to deter wrongdoing and to promote:

1. Honest and ethical conduct of all employees;
2. The avoidance of conflicts of interest;
3. Compliance with all applicable laws and regulations;
4. The prompt reporting of any breaches of this policy; and
5. Accountability and adherence to this policy.

It is each employee’s responsibility to:

1. Become familiar with and conduct business in accordance with all applicable laws and regulations and all of Ashtead’s policies;
2. Treat all fellow employees, customers, suppliers and business partners in an honest and fair manner;
3. Avoid situations where personal interests are, or appear to be, in conflict with Ashtead’s interests;
4. Safeguard and use properly Ashtead’s proprietary and confidential information, assets and resources.

In carrying out their duties employees should avoid even the appearance of impropriety and should act for the sole benefit of Ashtead.

Responsibility for compliance with this policy, including the duty to seek guidance when in doubt, rests with each Ashtead employee. Ashtead is committed to taking prompt and consistent action against breaches of this policy. Breaches of this policy may be grounds for disciplinary action, up to and including dismissal. Employees who believe that this policy may be being breached should report their concerns immediately using the Group’s third-party hosted whistleblowing lines.

Within the US and Canada, reports may be via the whistleblowing hotline by calling + 1 844 960 0579 or online using the [Sunbelt North America Navex portal](#). Within the UK, reports may be made via the Sunbelt UK AlertLine facility by calling + 44 800 031 8508 and from Ireland by calling +353 180 045 8508.

## **Fair competition**

Ashtead is dedicated to competing fairly in each jurisdiction in which it conducts its business.

All relevant employees have received on-line Bribery Act or Foreign Corrupt Practices Act and competition law training. Relevant employees are provided with periodic updates.

No employee may, directly or indirectly, offer, solicit, pay or accept a bribe or such other payment or gift that may be construed as such in any form. Corporate hospitality may only be accepted or offered if it is of modest value and in compliance with any applicable laws and is subject to management approval. Employees are directed to their respective staff handbooks and subsidiary company policies for further details on the giving and receiving of gifts and/or entertainment.

## **Health and safety**

Health and safety is of paramount importance to Ashtead's business as it needs to provide equipment that is safe to use and minimise the risks that employees and customers may encounter. A strong reputation for excellent health and safety is a significant competitive advantage for Ashtead. Ashtead makes a considerable annual investment in ensuring its rental equipment meets or exceeds the latest safety standards and that employees receive training in safe working practices specific to their needs and business area.

Ashtead's extensive health and safety programmes monitor, develop and maintain safe working practices whilst reminding employees of the need to be safe at all times and look after their health. Employee's continued awareness is accomplished through a combination of proactive safety and leadership programmes and timely incident response and investigation.

Ashtead monitors health and safety by the number of reported incidents that occur and near misses. Incidents are tracked and analysed to enable Ashtead to identify recurrent issues and implement preventative improvements.

## **Environmental**

Through Ashtead's activities and as a result of the use of its equipment by its customers, Ashtead recognises that it will impact the environment through consumption of resources, the generation of GHG and other emissions and waste. Ashtead seeks to minimise the environmental impact of everything it does and aims for continuous improvement in its environmental performance.

Policies and procedures are in place within the Group's subsidiary companies regarding the need to adhere to local laws and regulations regarding environmental matters, with clear assignment of responsibilities for compliance matters. Procurement policies are in place which reflect the need for the latest available emissions management and fuel efficiency tools in the fleet.

## **Human rights**

Ashtead believes in the rights of individuals and take its responsibilities to all our employees and those who may be affected by our activities seriously, with details set out in the Group's [Human Rights policy](#). The Group is committed to preventing human trafficking, forced labour, child labour and supporting freedom of association and the right to collective bargaining. Ashtead pays equal remuneration for work of equal value and provides a safe and healthy working environment free from discrimination of any kind.

Employees are directed to their respective staff handbooks and subsidiary company policies for further details on the application of these commitments. Furthermore, the Group's ethical sourcing policy sets out our requirement of suppliers to the Group.

## **Equal opportunity**

Providing equal opportunities for all Ashtead's employees and ensuring employment diversity are priorities for Ashtead. Ashtead makes every effort to give disabled applicants and existing employees who become disabled opportunities for work, training and career development in keeping with aptitudes and ability. Ashtead does not discriminate on the basis of protected status such as sex, colour, race, religion, native origin or age.

## **Confidentiality**

All employees must maintain the confidentiality of price sensitive and commercial information and not use such information for personal gain, or divulge it to any person, company or other organisation. Such information must be treated with the utmost secrecy.

## **Whistleblowing**

Ashtead recognises that it is important that all employees feel confident that they may voice genuine concerns relating to possible business malpractices or breaches in ethical behaviour without the fear of suffering a detriment. Ashtead will respect the confidential nature of any communications and ensure the protection of any individual from harassment or victimisation.

Ashtead complies with all applicable laws addressing the treatment of "whistleblowers". A whistleblower is defined by this policy as any person who reports an activity that he/she considers in good faith to be illegal, dishonest, harmful or unethical. The whistleblower is not responsible for investigating the activity or determining fault or corrective measures.

All concerns or knowledge of illegal, dishonest, harmful or unethical activity should be reported via the whistleblowing lines detailed above or to Ashtead's General Counsel ([lynne.fuller-andrews@sunbeltrentals.com](mailto:lynne.fuller-andrews@sunbeltrentals.com) or +1 803-578-5911) or Company Secretary ([aporter@ashtead-group.com](mailto:aporter@ashtead-group.com) or +44 20 7726 9740).

Employees must exercise sound judgment to avoid baseless allegations. An employee who intentionally reports false or baseless concerns will be subject to disciplinary action up to and including dismissal.

Insofar as possible, the confidentiality of the whistleblower will be maintained. However, the identity of the whistleblower may have to be disclosed to conduct a thorough investigation and/or to comply with the law and to provide accused individuals with their rights. Ashtead will not retaliate against the whistleblower. This includes but is not limited to, protection from retaliation in the form of adverse employment action such as termination,

compensation decreases, poor work assignments and threats of physical harm. Any whistleblower that believes he/she is being retaliated against must contact Ashtead Group's General Counsel immediately. The right of a whistleblower against retaliation does not include immunity for any personal wrongdoing.

Ashtead Group's General Counsel will investigate all reports of illegal, dishonest, harmful or unethical activity and report all such allegations and results of subsequent investigations to the Group's board of directors.

**Responsibility for the policy**

The Ashtead Group plc board of directors has overall responsibility for this policy.

Approved by the Board of Ashtead Group plc

Dated the 29 August 2024

# APPENDIX E



**ASHTEAD GROUP PLC**  
**MODERN SLAVERY AND HUMAN TRAFFICKING POLICY**

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**1. Introduction**

- 1.1 Modern slavery is a crime resulting in the abuse of human rights. It is defined as the offences of “slavery, servitude, forced or compulsory labour” and “human trafficking”.
- 1.2 Ashtead Group plc and its subsidiary companies (“Ashtead”) are committed to ensuring that there is no modern slavery within their own businesses or in any of their supply chains and it expects similar commitments from those it conducts business with.
- 1.3 This policy applies to all Ashtead employees together with its contractors, agency workers, suppliers and consultants.

**2. Compliance with this policy**

- 2.1 All relevant employees are required to read, understand and comply with this policy and must avoid any action or inaction which might lead to a breach of the policy.
- 2.2 Where any employee suspects that this policy is being breached or potentially breached or there is any conflict with it, the employee must report this immediately via the whistleblowing lines, details of which are provided below. Reports may be made on an anonymous basis if an employee wishes to do so.

Within the US and Canada, reports may be made via the whistleblowing hotline by calling + 1 844 960 0579 or online using the [Sunbelt North America Navex portal](#). Within the UK, reports may be made via the Sunbelt UK AlertLine facility by calling + 44 800 031 8508 and from Ireland by calling +353 180 045 8508.

Where any supplier or contractor of Ashtead suspects that this policy is being breached or potentially breached they must immediately report via the whistleblowing lines detailed above or by notifying Ashtead’s General Counsel ([lynne.fuller-andrews@sunbeltrentals.com](mailto:lynne.fuller-andrews@sunbeltrentals.com) or +1 803-578-5911) or Company Secretary ([aporter@ashtead-group.com](mailto:aporter@ashtead-group.com) or +44 20 7726 9740).

- 2.3 Ashtead confirms that no employee will suffer any detriment by raising genuine concerns about the existence of modern slavery in its business or its supply chain. If any employee feels that they suffered or may suffer any detriment as a result of raising genuine concerns, they should report this immediately to Ashtead’s General Counsel or via the whistleblowing line.
- 2.4 Any employee found to be in breach of this policy or preventing others from complying with this policy will face disciplinary action, up to and including dismissal.

### **3. Awareness of the policy**

- 3.1 Ashtead will ensure that all relevant employees involved with its supply chains will receive training to understand and identify incidents of modern slavery.
- 3.2 As part of Ashtead's supplier approval process all suppliers are advised of and asked to confirm compliance with the Modern Slavery Act, all other relevant legislation and this policy.
- 3.3 Ashtead publishes a Modern Slavery Statement on its website stating the steps it has taken during the financial year to ensure that modern slavery and human trafficking is not taking place in any of its supply chains and in any part of its own business.

### **4. Responsibility for the policy**

- 4.1 The Ashtead Group plc board of directors has overall responsibility for this policy.
- 4.2 The executive boards of each business have responsibility for the implementation of the policy by ensuring that all appropriate training is available and for arranging the auditing of systems to ensure compliance with the policy both internally and externally.
- 4.3 It is the responsibility of all managers to ensure that all relevant staff have undertaken all appropriate training and are able to demonstrate evidence of the understanding of and compliance with this policy.

### **5. Ethical Sourcing Policy**

The Group's Ethical Sourcing Policy can be found on the Ashtead website ([www.ashtead-group.com](http://www.ashtead-group.com)).

Approved by the Board of Ashtead Group plc  
Dated the 29 August 2024