



**SUNBELT RENTALS HOLDINGS, INC.**  
**MODERN SLAVERY AND HUMAN TRAFFICKING POLICY**

**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 labor” and “human trafficking”.
- 1.2 Sunbelt Rentals Holdings, Inc. and its subsidiary companies (“Sunbelt”) 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 Sunbelt 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.

Reports may be made online using the [Sunbelt Navex portal](#) or via the whistleblowing hotline by calling the relevant number listed [online](#) based on the country in which you are located.

Where any supplier or contractor of Sunbelt suspects that this policy is being breached or potentially breached they must immediately report via the whistleblowing lines detailed above or by notifying Sunbelt’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 Sunbelt 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 Sunbelt’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 Sunbelt 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 Sunbelt'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 Sunbelt 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 Sunbelt Rentals Holdings, Inc. 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 Sunbelt website ([Governance Documents :: Sunbelt Rentals Holdings, Inc. \(SUNB\)](#)).

Approved by the Board of Sunbelt Rentals Holdings, Inc.

Dated the 25th February 2026