



## **SUNBELT RENTALS HOLDINGS, INC. HUMAN RIGHTS POLICY**

### **1. Commitment to Human Rights**

Sunbelt Rentals Holdings, Inc. and its subsidiaries (“Sunbelt” or “the Group”) believes in the rights of individuals and takes their responsibilities to all their employees and those who may be affected by their activities seriously. We have the same expectations of those with whom we do business. We are committed to respecting, and supporting efforts to protect the human rights and dignity of all people, not only those on our own team, but those in our supply chain and in the communities where we operate.

Our commitment to human rights is guided by the principles contained within the United Nations Universal Declaration of Human Rights and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work. In implementing this policy, we strive to apply the approaches advanced by the United Nations Guiding Principles on Business and Human Rights.

Our policy is to:

- set, monitor and periodically review and communicate, both internally and externally, the Group’s human rights policy and processes;
- take all reasonable steps to promote workplace health and safety, supported by detailed policies and procedures established by each operating business and through relevant training provided to individuals across the Group;
- ensure recruitment undertaken by the Group is free and fair and in accordance with applicable employment law, with resulting employment terms in compliance with labor hours regulations in addition to compensation and benefits legislation;
- protect the rights of individuals to freedom of association and collective bargaining;
- promote non-discrimination, equal employment opportunity and diversity, equity and inclusion throughout our operations and our supply chain;
- not use, or be complicit in, forced or compulsory labor;
- not engage in human trafficking or subject individuals to forced labor or modern slavery;
- respect the rights of children and young people, and prevent the use of underage labor in our own operations and that of our supply chain;

- not engage in, benefit from or be complicit in sexual exploitation and abuse or gender-based violence or crimes;
- prohibit harassment and violence in the workplace, with policies and procedures in place within the operating businesses. We expect all team members to be respectful of each other and those with whom we interact;
- promote the workplace safety and security of our employees; and
- have a commitment to non-retaliation, recognizing that it is important for all employees to feel confident that they may voice genuine concerns without fear of suffering a detriment. Sunbelt will respect the confidential nature of any communications and ensure the protection of any individual from harassment or victimization.

## 2. Implementing Policies

Our human rights policy is implemented through a wide range of policies and operating procedures, principally implemented through the Group's subsidiary undertakings. At a group-wide level, these policies and protocols include:

- 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 and accompanying statement 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, which includes all subsidiary undertakings, to maintain the highest ethical standards and comply with all legislative and regulatory requirements when conducting business. The policy addresses specifically the topics of fair competition, health and safety, environmental matters, human rights, equal opportunities, confidentiality and whistleblowing. The policy is available on the Group's website ([Business Ethics and Conduct Policy](#))
- Ethical Sourcing Policy – the Group's ethical sourcing policy sets out our expectations for suppliers and addresses specifically the topics of freely chosen employment, freedom of association and right to collective bargaining, working conditions, child labor, wages, working hours, anti-discrimination, regular employment and treatment of employees. The policy is available on the Group's website ([Ethical Sourcing Policy](#)).

In adhering to the Group's policies, the Group's operating subsidiaries are required to ensure their detailed policies and procedures reflect the Group's policies. Specifically, they maintain the following key policies:

- Sunbelt Rentals North America Supplier Code of Conduct – the code summarizes the laws, regulations and company policies that affect our business, addressing specifically topics of human rights, fair wages, health, safety and environment, equal opportunities, non-discrimination and prevention of harassment, and reporting concerns. The Sunbelt North America Code of Conduct is available on Sunbelt Rentals North American website ([Code of Conduct](#)).

Furthermore, employees receive training on the obligations set forth in the Code of Conduct and must annually certify that they have read and understand their obligations under the Code of Conduct. In addition, the Sunbelt Rentals Employee Handbook sets out other associated policies which include, but are not limited to matters relating to: accommodations for disabilities or religious purposes; confidential information; data privacy; discriminatory harassment; diversity & inclusion; equal employment opportunity; Fair Labor Standards Act; general harassment & bullying; gifts and bribes; government contracting; grievances; meal breaks & rest periods; minimum age requirements; overtime pay; pregnancy fairness; sexual harassment; and timekeeping; and

- Sunbelt Rentals UK have directly adopted the Group’s policies and these are available on the Sunbelt Rentals UK website ([Sunbelt UK policies](#)). In addition, they maintain several additional policies that support our commitment to human rights. These include, but are not limited to: anti-harassment and bullying; equal opportunities; recruitment and selection; ethical sourcing; gifts and bribes; parental leave; working time regulations.

### **3. Grievance Mechanisms**

The Group’s independent whistleblowing hotlines are available to any employee or member of the public and allow anyone who uses them to share concerns. 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.

Translators are available, and anyone who contacts the hotline may do so anonymously. Information provided through the hotline is documented in detail by an independent third-party interview specialist and forwarded to the relevant individual for investigation and resolution.

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).

The Group’s whistleblower policy aims to ensure that colleagues are confident that they can raise any concern about our business activities with the knowledge that it will be taken seriously, and that no action will be taken against them. The policy applies to all employees of the company and its subsidiaries, as well as third parties, including customers, suppliers, and members of the public. 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.

Internal HR helplines are also available to all Group employees which allows anyone who uses it to anonymously report concerns, ask questions or get help with a problem.

The company addresses all issues that are reported through the Group’s whistleblowing hotlines, HR helplines or directly to the Group General Counsel.

#### **4. Governance**

The Group's human rights policy and related policies are reviewed formally by the Board on a regular basis to ensure that they remain appropriate.

Approved by the Board of Sunbelt Rentals Holdings, Inc.  
Dated the 25th of February 2026