



ASHTEAD GROUP PLC MODERN SLAVERY STATEMENT

Ashtead Group plc (“Ashtead” or the “Group”) is an international equipment rental company, trading under the name Sunbelt Rentals. Ashtead 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 of 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. It is committed to ensuring that there is no 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, pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group’s slavery and human trafficking statement for the financial year ended 30 April 2020.

Ashtead’s business and supply chain

Ashtead operates national networks in the US, UK and Canada through 1,100 rental stores with over 18,000 employees. It supplies over 700,000 customers which range in size and scale from multi-national businesses, through strong local contractors to individual do-it yourselves. 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 835 stores across 46 states and the District of Columbia. The Group derives approximately 85% of its revenue from 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 77 stores across Canada. The Group derives approximately 5% 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 191 stores nationwide and generates approximately 10% of Group revenue. The Group also generates revenue in Germany and the Republic of Ireland under the management of its UK business.

While the Group sources goods and services from a wide range of suppliers, the Group's businesses predominately work with a number of major equipment suppliers of which the majority are based in North America and Europe. The table below highlights key features of the Group's supply chain:

	US	Canada	UK
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 Lighting and grip	General equipment Accommodation Formwork and false work Climate control Temporary roadway and barriers Survey Traffic Management
Major suppliers in FY20	Atlas Copco Clark Equipment JCB JLG Industries John Deere Larson Group Multiquip Pioneer Pritchard Auto Terex	First Truck JLG Industries Kubota Multiquip Skyjack Sullivan-Palatek Tennant Terex Universal Ford Lincoln Wacker Neuson	Boss Cabin Hydro JCB Meva Shindaiwa Terex Thurston Traffic Group Trime 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.

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 ensure 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 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. 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.

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, details of which are provided in the Group’s Modern Slavery and Human Trafficking Policy. All calls are investigated expeditiously and the outcomes of those investigations are reported to the Board together with any action taken.

Ongoing due diligence, monitoring of suppliers and training

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 new 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](#)) and which was most recently reviewed in February 2021. In the UK, the purchasing policy is provided to suppliers as part of the supplier on-boarding process.

On an ongoing basis, existing suppliers are monitored to confirm compliance with our 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.

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.

The Group is now broadening its review to also incorporate operating expenditure suppliers, for example in relation to the sourcing of technology services and staff uniforms.

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 annually in the UK. In the UK, employees have also received specific training related to modern slavery. Similar training for relevant employees in North America will be delivered in the coming year.

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 improve its actions in this area. In the UK, the Group has entered into a partnership with the Slave-Free Alliance to help the Group strengthen further the actions taken in relation to the risks of modern slavery.

In the year ahead, Ashtead'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;
- develop its working relationship with the Slave-Free Alliance in the UK to assess its approach to addressing the risk of modern slavery in the Group's supply chain. If appropriate, this partnership may be broadened to encompass the Group's businesses in North America;
- dialogue with suppliers in relation to modern slavery, rationalising our supply chain and extending the scope of our diligence and monitoring activities to service providers;
- education and training of relevant employees across our businesses with specific modern slavery training to be launched in North America for relevant employees; and
- review of existing and new major suppliers or those identified as higher risk to confirm compliance with the Group's Modern slavery, Ethical sourcing and Business ethics and conduct policies.

Approval of this statement

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



Brendan Horgan
Chief executive
1 March 2021