

## Modern Slavery and Human Trafficking Policy

Ashtead Technology (the “Company”) understands the Modern Slavery Act 2015 and is committed to ensuring that there is no slavery, servitude, child labour, forced labour, human trafficking and any related exploitation in any part of our business and supply chain.

The Company works to the highest ethical standard and integrity which forms the basis of our business relationships and transactions. In doing so, we understand the responsibility to ensure there is no slavery or human trafficking taking place anywhere within our supply chains. We have a zero-tolerance approach and expect all our suppliers and vendors to comply with our business’s ethical standards.

This policy is designed to ensure that Ashtead Technology complies with the applicable laws in the jurisdictions in which Ashtead Technology operates and with relevant international standards, including the UN Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights and the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.

### Company structure

The Group is headquartered in Scotland, UK and operates internationally through a number of legal entities including:

- Ashtead Technology Ltd
- Ashtead Technology Offshore Inc.
- Ashtead Technology (South East Asia) Pte Ltd
- TES Survey Equipment Services LLC
- Underwater Cutting Solutions Ltd
- Welaptega Marine Ltd

### Supply chain

We expect our approved vendors, customers and suppliers we have a business relationship with to ensure their goods, materials and labour-related supply chains fully comply with the Modern Slavery Act 2015, are transparent, accountable and free from any ethical ambiguities.

As part of our vendor/supplier assessment process, companies will be required to declare their compliance with:

- Modern Slavery Act 2015
- Bribery Act 2010
- In addition to recognised Quality, Environmental and Health and Safety standards

In addition, approved supplier reviews include on-going compliance to our ethical standards.

### Relevant policies & procedures

All employment policies and procedures are implemented to ensure that employees working for Ashtead Technology are recruited under an approved process; from a reputable source and that any required personnel checks are undertaken prior to employment (where this is legally required) or during any probation period, to verify the employee and their eligibility to work.

All employed personnel will receive a formal job description, employment contract or letter and be entered into an approved payroll system for declaration to the appropriate governmental departments.

An Anti-Bribery & Corruption Policy is in place to help ensure a reporting mechanism is in place to report

any incidents which may seek to overcome required checks and audits of a business to ensure they reach our ethical standards.

A Whistleblowing Policy is in place to encourage employees to report any concerns related to activities either directly related to the Company or within the supply chain process. Concerns may include anti-bribery, corruption, risks of slavery or human trafficking, illegal or unethical business practices.

The Company is committed to developing an honest and open working environment and encourages everyone to deal honestly and respectfully with each other. The Company strives to ensure that employees work in a professional business manner, aware of the expectations placed upon them to work to the fair and ethical standards of the Company.

### **Due diligence**

The Company strives to build strong long-standing relationships with a preferred list of suppliers who work to the same ethical principles and standards. We communicate our business and ethical standards and expectations clearly to all new vendors and reinforce the compliance requirements regularly to ensure they are adhered to and sustained.

The responsibility to demonstrate safe working conditions, ethical standards in the employment of workers and the compliance with all employment legislation is held with the supplier. If any worker related risks or serious conduct violations are discovered, steps will be taken to investigate the issue and where implementation of improvement objectives or measurable initiatives to improve ethical/working conditions has not been successful, permanent termination of the business relationship will be initiated.

### **Communication**

All new employees will receive a copy of this policy to highlight the risks of modern slavery and human trafficking in supply chains and business relationships. This policy will also be posted on the Company's website and on its internal intranet for employees.

### **Modern slavery transparency statement**

The Company will publish within six months of the end of each financial year its annual Modern Slavery Transparency Statement on its home webpage and, if required, submit the Statement to the appropriate regulatory authorities, in compliance with international laws, including under section 54(1) of the UK Modern Slavery Act 2015. The Transparency Statement will detail the steps Ashtead has taken in the last financial year to ensure that modern slavery is not taking place in any of its supply chains and in any part of its own business. Please view our Modern Slavery Transparency Statement on our website.

Allan Pirie

A handwritten signature in black ink, appearing to read "Allan Pirie".

**Chief Executive Officer**

Ashtead Technology Ltd, Ashtead Technology Offshore Inc, Ashtead Technology (South East Asia) Pte Ltd, TES Survey Equipment Services LLC, Underwater Cutting Solutions Ltd and Welaptega Marine Ltd.