

Introduction

At Ashtead Technology, we value strong, collaborative relationships with our suppliers as an essential part of achieving shared success. Our Supplier Code of Conduct is not merely a list of requirements but a guide to mutual standards and values that we believe contribute to ethical and sustainable business practices.

This Code reflects our values of Agility, Collaboration, and Excellence and outlines our expectations for suppliers in supporting these values. By aligning these standards, we can enhance the quality of our services, elevate industry standards, and create a positive impact on our communities and the environment.

We appreciate the vital role our suppliers play in our business and are here to support you in meeting these standards. We hope you view this Code as a framework for our shared goals and the foundation of a successful partnership.

Scope

This requirement applies to all external parties providing goods and services to Ashtead Technology.

Ethics and Compliance

We are committed to conducting our business by operating transparently and in full compliance with all applicable laws. We require our suppliers to adopt these principles and establish practices that support fair, honest, and responsible business operations. This helps create a foundation for trust and accountability in all our relationships.

Governance and Law

Good governance is essential to responsible business conduct. Suppliers are expected to demonstrate strong governance standards by maintaining accurate records, operating with transparency, and complying with all applicable laws. This includes, but is not limited to laws concerning labour rights, workplace health and safety, environmental protection, anti-bribery and corruption, sanctions and trade controls, anti-money laundering, competition law, data protection and privacy and the prevention of criminal tax evasion. Upholding these standards promotes accountability, strengthens trust, and supports a robust and ethical partnership.

Whistleblowing

We promote a culture of openness and accountability. Suppliers should implement processes for employees to report unethical, unlawful, or unsafe activities without fear of retaliation, in accordance with the Public Interest Disclosure Act 1998 and any similar laws in regions where they operate. These practices support transparency and help protect our shared values.

Human Rights and Modern Slavery

Respect for human rights is core to our values. We expect suppliers to uphold these human rights principles in line with the UK Modern Slavery Act 2015 and the UN Guiding Principles on Business and Human Rights, ensuring that no form of forced labour, human trafficking, or involuntary servitude occurs within their operations. By working together, we help promote a world where the rights and dignity of all individuals are respected.

Child Protection / Welfare

We are committed to upholding and protecting children's rights. Suppliers must comply with all applicable child labour laws and standards, ensuring that young workers are supported and safeguarded in compliance with the UN Convention on the Rights of the Child. This reflects our shared commitment to ethical labour practices and the protection of vulnerable individuals.

Inclusion and Diversity

We recognise that a diverse and inclusive workplace drives innovation and strengthens performance. Ashtead Technology expects suppliers to foster an inclusive work environment that offers equal opportunities and is free from discrimination. This commitment reflects the principles of the UK Equality Act 2010 and other relevant non-discrimination laws, which protect individuals from unfair treatment and support a more equitable society.

Harassment and Bullying

Ashtead Technology is committed to maintaining a respectful working environment and expects the same from our suppliers. We expect our suppliers to take proactive steps to prevent harassment, bullying, and any form of abusive behaviour, ensuring that all workers are treated with dignity. A safe and supportive environment fosters respect, enhances productivity, and strengthens our shared success.

Health, Safety and Environment (HSE)

We are committed to maintaining high standards of health, safety, and environmental care, in line with the Health and Safety at Work Act 1974 in the UK and the Occupational Safety and Health Administration (OSHA) regulations in the US. We expect our suppliers to uphold these standards by implementing effective measures to protect their employees, the environment, and the communities in which they operate. A strong focus on HSE contributes to a safer, healthier, and more sustainable workplace and world.

Data Protection

Protecting personal data is essential to maintaining trust. Suppliers handling data on behalf of Ashtead Technology must comply with data protection laws, including the EU General Data Protection Regulation (GDPR) and other applicable data protection laws in jurisdictions where they operate. This requires ensuring confidentiality, integrity and security of personal information to safeguard the privacy of all stakeholders.

Competition and Antitrust

Ashtead Technology supports a fair, competitive marketplace and expects its suppliers to adhere to competition laws, including the UK Competition Act 1998 and other relevant anticompetition legislation. Suppliers must avoid anticompetitive practices, such as price fixing or market manipulation, to help ensure fairness, transparency and value across our industry.

Sustainability

Sustainability is central to our commitment to future generations. We expect our suppliers to adopt environmentally responsible practices, including reducing waste, enhancing energy efficiency, and responsibly sourcing materials. By supporting sustainability efforts, we collectively contribute to a healthier planet for the future.

Compliance with local laws

In addition to the specific laws and regulations mentioned in this Code, we expect suppliers to comply with all relevant laws and regulations in the countries where they operate. This commitment to local compliance ensures that our partnerships respect the laws and cultural standards of every region.

Conflict of Interest

Ashtead Technology expects suppliers to act with integrity and avoid any situation where personal, financial, or other interests could conflict, or appear to conflict, with their obligations to Ashtead Technology.

Suppliers must disclose any actual or potential conflict of interest that may arise in connection with their business relationship with us and take appropriate steps to manage or eliminate such conflicts. This includes relationships, financial interests, gifts or hospitality, or other circumstances that could improperly influence decision-making.

Maintaining transparency in this area is essential to maintaining trust and ensuring fair, objective, and ethical business conduct.

Our Commitment to you

We recognise that achieving these standards can be challenging, and we are here to support you on this journey. This Supplier Code of Conduct is intended as a collaborative guide that reflects our shared values and mutual commitment to ethical practices. Together, we aim to create value, build trust, and promote positive change within our industries and communities.

Compliance and Partnership

Should our suppliers have any concerns that any of their activities are in contravention of this Code we ask that these concerns are shared with our Supply Chain Manager.

Ashtead Technology may periodically monitor compliance with this Code through audits, self-assessments, or reporting mechanisms. We expect our suppliers to cooperate fully and provide requested information as part of our shared commitment to high standards.

In cases where improvements are needed, we commit to providing guidance and support to help you meet these expectations. However, in severe cases we may suspend or terminate the business relationship.

By working together, we can achieve these standards and strengthen our partnership.

Andrew Sorrie

Supply Chain Manager



Revision Control

Document Title		Supplier Code of Conduct	
Revision	Date	Author	Comments
2	03/03/26	A.Sorrie	General review, addition of Conflicts of Interest Section and some minor wording updates
Approver		A.Sorrie – Supply Chain Manager	
Author		A.Sorrie – Supply Chain Manager	