# SUPPLIER CODE

At United Rentals, we are committed to a standard of excellence in every aspect of our business and ethical and responsible conduct in all phases of our operations. We view our suppliers as extensions of the Company and seek suppliers who demonstrate strong values and commitment to the ethical principles outlined in this Supplier Code. We expect our suppliers to comply with the sound business practices we embrace, follow the law and conduct activities in a manner that respects human rights and protects the environment.

#### Compliance with the Supplier Code

This Supplier Code sets forth United Rentals' standards and expectations with respect to key areas of corporate responsibility and applies globally to each of our suppliers. Suppliers and contractors and their employees, personnel, agents and subcontractors (collectively referred to as "suppliers") must adhere to this Supplier Code while conducting business with or on behalf of United Rentals. Suppliers in California<sup>1</sup> must also adhere to our Supplier Code Addendum for Suppliers in California.

All suppliers must conduct their employment practices in full compliance with all applicable laws and regulations and in compliance with United Rentals' requirements, which may exceed local legal requirements. Suppliers must also conduct their business in accordance with all international trade laws and sanctions. In all cases in which our requirements are more stringent than local legal requirements, suppliers are required to meet the more stringent United Rentals' requirements.

While suppliers are expected to self-monitor and demonstrate their compliance with the Supplier Code and United Rentals' Code of Ethical Conduct, United Rentals may, at its option and at any time, audit suppliers or inspect suppliers' facilities to confirm compliance. Suppliers that behave in a manner that is unlawful or inconsistent with the Supplier Code, or any United Rentals' policy, risk termination of their business relationship with United Rentals. Complying with the Supplier Code is required in addition to meeting any other obligations contained in any agreement a supplier may have with United Rentals.

## **Legal Compliance and Business Integrity**

Suppliers are expected to conduct their business in an ethical manner and to act with integrity and in accordance with our Code of Ethical Conduct. Key provisions of our Code of Ethical Conduct include the following aspects:

- Anti-Corruption. United Rentals is committed to complying with the U.S. Foreign Corrupt Practices Act and the
  anti-corruption and anti-money laundering laws of the countries in which we operate. Suppliers may not
  participate in bribes or kickbacks of any kind, whether in dealings with government officials or individuals in the
  private sector.
- Fair Business and Competition. Suppliers will comply with all applicable fair business, and competition laws, including fair trading and anti-trust laws.
- Accurate Records. Suppliers must honestly and accurately report all business information and comply with all
  applicable laws regarding their completion and accuracy. Our suppliers must also create, retain and dispose of
  business records in full compliance with all applicable legal and regulatory requirements.
- Confidentiality and Protection of Information. Suppliers will respect intellectual property rights and protect confidential information.



<sup>&</sup>lt;sup>1</sup> For purposes of this Supplier Code, "Suppliers in California" means (i) Company contracted third-party employers which have employees working on or at Company branches/locations in California and (ii) Company contracted third-party employers which have employees on or at worksites/locations in California working on behalf of the Company.

- **Privacy and Data Security Laws.** Suppliers will comply with privacy rules and regulations, including all applicable data protection laws, contractual requirements relating to the protection of personal information and all applicable security standards relevant to our work together.
- **Conflicts of Interest.** Suppliers must not engage in activities that create, or appear to create, a conflict between suppliers' interests and the interests of United Rentals.
- **Gifts and Entertainment.** Suppliers should note that as a general rule, our employees will not accept gifts, favors or entertainment that have a value of greater than \$250 (U.S.) per person. Any gift of cash or gift or entertainment that obligates our employee or compromises their professional judgment is strictly prohibited.

### **Commitment to Protecting Human Rights**

United Rentals is committed to protecting human rights and treating its employees with dignity and respect. Our <u>Human Rights Policy Statement</u> details our continued efforts in this regard. We expect our suppliers to adopt similar policies, and respect and protect fundamental human rights across their value chain in accordance with international standards set forth by the United Nations Universal Declaration of Human Rights and the International Labour Organization's Fundamental Conventions, including:

- Voluntary Labor. Forced, bonded or indentured labor or involuntary prison labor is prohibited.
- **Child Labor.** Suppliers must not employ any person younger than 14 years of age unless specifically permitted by laws of the country where the person is employed. Nor shall the supplier interfere with a child's education by employing a child in violation of a country's compulsory education laws. Suppliers may use legitimate, voluntary workplace apprenticeship programs, such as internships, as long as they comply with all laws and regulations.
- **Discrimination, Harassment or Abuse.** Suppliers must commit to treating every employee with respect and dignity. No employees should be subject to any physical, sexual, gender-based, psychological or verbal harassment or abuse. Suppliers will not engage in discrimination based on protected characteristics or traits under applicable law, which may include but not be limited to (depending on the jurisdiction) race, national origin, ethnicity, color, creed, caste, age, sex, sexual orientation, gender identity / transgender status, physical or mental disability, pregnancy, genetic information, religion, political affiliation, union membership and marital, citizenship or veteran status, in hiring and employment practices such as promotions, rewards and access to training.
- Health and Safety. Suppliers must put safety first with an aim to prevent all injuries, occupational illnesses and
  safety incidents. Suppliers must implement robust health and safety systems, actively promote and provide a safe
  and healthy work environment, provide appropriate PPE and training, and promptly report serious incidents
  related to work with United Rentals.
- Wages, Benefits, Remuneration and Working Conditions. Suppliers will pay applicable and fair legal wages, including paid overtime, under humane conditions, including maintaining reasonable employee work hours in compliance with applicable law and international standards. In addition, United Rentals expects suppliers to pay a fair and living wage to their employees, or to work towards paying a fair and living wage. Suppliers will also provide their employees all statutory benefits and all mandatory vacations and leaves (paid and unpaid) and make all social insurance contributions on behalf of their employees as required by applicable law.
- **Women's Rights.** Suppliers will ensure women workers receive equal treatment in all aspects of employment and are afforded the same opportunities for advancement as their male counterparts.
- Modern Slavery and Human Trafficking. Pursuant to our <u>Statement on Modern Slavery and Human Trafficking</u>, suppliers must promote awareness around modern slavery and human trafficking and take the necessary steps to ensure that any form of slavery and human trafficking is not taking place in their business or their supply chain.
- Freedom of Association. Suppliers shall respect and recognize the right of employees to join and organize associations of their own choosing and should bargain collectively and engage in effective and meaningful information and consultation procedures. Employees should not be subject to intimidation, bullying or harassment in the exercise of their right to join or refrain from joining any organization, and should be free from any form of retaliation for exercising these rights.

- Work Authorization. Suppliers will not knowingly employ individuals who are not authorized to work, as
  determined by governing law.
- Armed Conflicts; Conflict Minerals. Suppliers will take reasonable steps to assure the material used in the
  production and services they offer United Rentals do not originate from sources that directly or indirectly benefit
  armed groups that perpetrate human rights abuses. In addition, suppliers will procure materials needed for
  manufacturing components, parts, or products containing conflict minerals from conflict-free sources. Suppliers
  will adopt, implement and communicate to sub-suppliers their positions and policies regarding conflict minerals,
  and where possible, require their down-stream suppliers to adopt and implement similar positions and policies.

#### **Environmental Responsibility**

United Rentals recognizes its social responsibility to protect the environment. To this end, we measure and report our Scope 1, 2 and 3 greenhouse gas ("GHG") emissions and we have adopted an aspirational GHG intensity reduction goal for our Scope 1 and 2 emissions and Scope 3 emissions from our outside haulers, as more fully described in our <a href="Corporate Responsibility Report">Corporate Responsibility Report</a>. We expect suppliers to share our commitment by responding to challenges posed by climate change and working toward protecting the environment.

As part of this commitment, we expect suppliers to evaluate their own emissions and any other key environmental metrics that are relevant to their businesses. We also expect suppliers to work to minimize their impact on the environment and, where appropriate, adopt their own climate goals. In addition, we welcome engagement with equipment suppliers to discuss their capabilities to provide low- and zero- carbon equipment options, which may help us and our customers meet climate goals.

At a minimum, all suppliers must, without limitation, comply with all applicable environmental laws and regulations including, but not limited to, laws and regulations that regulate hazardous materials, air and water emissions and waste. If applicable, our suppliers must also identify any chemicals or other materials that may be released, and which may pose a threat to the environment, and manage such chemicals or materials appropriately to ensure their safe handling, movement, storage, use, reuse, recycling, and disposal.

#### Raising Concerns and Reporting Questionable Behavior

We encourage our suppliers to report possible violations of the Supplier Code or questionable conduct to United Rentals by contacting any of the following:

- **Suppliers' Primary Business Contact.** If that is not possible or appropriate, you may also contact the Company's Alertline and/or Legal Department.
- Alertline. Our Alertline is monitored by a third party provider and is available 24 hours a day, 7 days a week. It is
  a convenient way to report any known or suspected violation of the Company's policies or requirements, the law,
  or other unethical behavior and reports may be made anonymously where permitted by local law. Our Alertline
  can be accessed by calling (877) HELP-URI or by visiting ethicspoint.com.<sup>2</sup>
- Legal Department. Suppliers may contact our Legal Department via email at legal@ur.com or by way of mail addressed to: United Rentals, Inc., 100 First Stamford Place, Suite 700, Stamford, CT 06902, Attn: Chief Legal Officer.

We will maintain confidentiality to the extent possible and will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of the Supplier Code. We are committed to periodically reviewing and updating this Supplier Code, as appropriate, to reflect changes in applicable laws and evolving best practices.

<sup>&</sup>lt;sup>2</sup> For individuals in the European Union or United Kingdom: Please note that, due to EU and UK legislation, the Alertline phone or web services only allow for reporting of financial, accounting and auditing matters. To report any other issues, contact your Company representative or the Company's Legal Department. For individuals in Australia or New Zealand: The provisions regarding the Alertline are governed by and must be read in conjunction with the local laws, including, but not limited to, for Australia, the Privacy Act 1988 (Cth), and for New Zealand, the Privacy Act 2020, and other relevant Privacy legislation and regulations. To report issues, contact your Company representative or the Company's Legal Department.