



WHISTLEBLOWING POLICY

Our Policy on

Whistleblowing

Policy Applicable: All Job Levels & Divisions

Policy Owners: People Team

Last Updated: April 2026

People Team Contact Information

hrenquiries@sunbeltrentals.co.uk

01925 281023

Contents	Page
1.0 Document History	4
2.0 Introduction	4
3.0 Scope.....	4
4.0 Responsibilities	5
4.1 Colleagues	5
4.2 Managers	5
4.3 HSEQ Department	5
4.4 People Team	5
5.0 Process	5
5.1 Qualifying Disclosures	5
5.2 Procedure	6
5.3 Anonymous Disclosures	6
5.4 Formal Action	7
5.5 Protection Against Detrimental Treatment.....	7
5.6 Sexual Harassment Reporting	7
6.0 Employee Assistance Programme (EAP).....	8
7.0 Mental Health First Aiders	8
8.0 Policy Approval	8
9.0 Data protection	9

1.0 Document History

Version	Date	Changes	Author
1.0	01/04/2024	Rewrite	P Tootill
1.5	01/02/2025	Navax Added and new DWO Contact	P Tootill
2.0	01/04/2026	Date Change, Audit box added and Employment Law Update	P Tootill

2.0 Introduction

The whistleblowing policy applies across all UK business units. Governance responsibility sits with People Team, with oversight by Chief Executive Officer, Phil Parker. The policy is reviewed on an annual basis and updated as necessary to ensure continued compliance with applicable UK/ROI legislation and business requirements.

Sunbelt Rentals' aim is always to conduct its business with the highest standards of integrity and honesty. We expect all colleagues to maintain the same standards in everything they do. All those who work for us are therefore strongly encouraged to report any perceived wrongdoing by the business or its colleagues, contractors or agents that falls short of these principles.

Whistleblowing is the name given to the act of the disclosure of information to the employer or the relevant authority by an individual who knows, or suspects, that the Company is responsible for or taken part in some wrongdoing.

Those making qualifying disclosures are protected against dismissal or detriment by The Public Interest Disclosure Act 1998.

This policy does not form part of the contracts of employment, and we reserve the right to amend or withdraw it at any time.

3.0 Scope

We recognise that colleagues may not always feel comfortable about discussing their concerns with others in the Company, especially if they believe that the business itself is responsible for the wrongdoing.

The aim of this policy is to ensure that colleagues are confident that they can raise any concern about our business activities in the knowledge that it will be taken seriously, and that no action will be taken against them.

This policy applies to all directly employed colleagues of the Company and its subsidiaries.

4.0 Responsibilities

4.1 Colleagues

All colleagues have a responsibility to work within the confines of all normal operating practices and Company policies and procedures.

All colleagues have the responsibility to use this Whistleblowing policy as appropriate, ensuring that any breach is reported at the correct time and in the correct manner, wherever possible.

4.2 Managers

Line Managers have the responsibility of responding to any member of their team or any other colleague who raises a whistleblowing complaint to them, seeking the appropriate support from other departments (HSEQ, People Team, etc) as required.

Line Managers are responsible for ordering and displaying the Whistleblowing awareness posters within work premises. Posters can be ordered online and posted out the work premises, the information for the ordering process is found on Interaction below the Whistleblowing policy.

4.3 HSEQ Department

The wider HSEQ department are responsible for ensuring the Policy is followed and applied fairly. The HSEQ department will provide impartial advice and guidance to all parties involved in the application of the Whistleblowing Policy.

4.4 People Team

The Group Board has appointed Charlotte Bennett, People Director as the Company's Designated Whistleblowing Officer (DWO).

The People Team are responsible for ensuring the Policy is followed and applied fairly. The People Team will provide impartial advice and guidance to all parties involved in the application of the Whistleblowing Policy.

The People Team will retain copies of all documentation gathered or produced as part of the process in line with GDPR guidelines. They are also responsible for monitoring and updating relevant policies and procedures.

5.0 Process

5.1 Qualifying Disclosures

Certain disclosures are prescribed by law as "qualifying disclosures". A "qualifying disclosure" means a disclosure of information that the individual genuinely and reasonably believes is in the public interest and shows that the Company has committed a "relevant failure" by:

- committing a criminal offence

- failing to comply with a legal obligation
- a miscarriage of justice
- endangering the health and safety of an individual
- environmental damage or
- concealing any information relating to the above.
- Sexual Harassment

These acts can be in the past, present or future, so that, for example, a disclosure qualifies if it relates to environmental damage that has happened, is happening, or is likely to happen. The Company will take any concerns that you may raise relating to the above matters very seriously.

Colleagues must reasonably believe that the disclosure is “in the public interest”. We encourage you to use the procedure to raise any such concerns.

Should the concern not meet the requirement to be a qualifying disclosure, you should raise this under the Company’s Grievance Policy instead. Where a concern is raised under the Whistleblowing Policy where it is not appropriate to do so, i.e. it relates to a personal grievance, the receiving manager will confirm that the matter will be addressed under the Grievance Policy instead.

5.2 Procedure

In the first instance you should report any concerns you may have to your line manager or Charlotte Bennett (Designated Whistleblowing Officer), where the concern relates to your line manager, or it is not appropriate to make the report to your line manager.

All concerns reported will be treated in the utmost confidence. You may submit your concerns in any format, but you may be asked to confirm any verbal concerns in writing or to confirm a written record of a verbal report.

Charlotte Bennett can be emailed to our confidential email address shown below:

whistleblowing@sunbeltrentals.co.uk

5.3 Anonymous Disclosures

We recognise that disclosures made under this policy may involve highly confidential and sensitive matters and that colleagues may prefer to make an anonymous disclosure.

Anonymous disclosures can therefore be made using the Navex Global Whistleblowing on the below details:

Phone No UK (Inc Northern Ireland) 0800 031 8508

Eire 180 045 8508

It is important to emphasise that the Company cannot guarantee to fully investigate all anonymous allegations. Proper investigation may prove impossible if the investigator cannot obtain further information from you, give you feedback, or ascertain whether your disclosure was made in good faith. For this reason, it is always preferable for whistleblowers to reveal their identity and measures can be taken to preserve confidentiality if appropriate.

Following receipt of a disclosure made under this policy, an investigation meeting will be held with the individual, if deemed appropriate. The purpose of this meeting is to gather as much information as possible from the colleague regarding their concerns, including whether they have any supporting evidence or can identify any witnesses.

After this meeting, the investigating manager will commence a full investigation into the concerns raised. The investigation will aim to gather all relevant information including relevant documentary evidence or witness statements.

Once the investigation is complete, the investigation manager will write to the colleague confirming the outcome.

If the colleague is not satisfied with the explanation or outcome, they may raise the matter with the appropriate official organisation or regulatory body. Alternatively, individuals may raise a formal complaint under the Company's Grievance Policy.

5.4 Formal Action

Should formal action be required as a result of any disclosure made under this policy, this action will be carried out in accordance with the applicable internal policy. Any potential sanctions imposed will be fair and reasonable in line with the relevant policy.

5.5 Protection Against Detrimental Treatment

All individuals who raise matters of concern under this policy are protected against detrimental treatment, up to and including dismissal, because they have made a disclosure.

Bullying, harassment or any other detrimental treatment afforded to a colleague who has made a qualifying disclosure is unacceptable. Anyone found to have acted in such a manner will be subject to being managed under the Company's Disciplinary Policy.

5.6 Sexual Harassment Reporting

The Company is committed to maintaining a working environment in which all individuals are treated with dignity and respect. Colleagues are encouraged to report any concerns relating to sexual harassment, whether experienced directly or witnessed.

Sexual harassment includes any unwanted conduct of a sexual nature that has the purpose or effect of violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment.

Concerns may be raised through this Whistleblowing Policy where:

- the matter is serious or systemic in nature,

- the individual does not feel comfortable raising it through usual grievance channels, or
- there is a belief that previous reports have not been appropriately addressed.

All reports will be taken seriously, handled sensitively, and investigated promptly. Individuals who raise concerns in good faith will be protected from retaliation in accordance with this policy.

6.0 Employee Assistance Programme (EAP)

The Company offers a confidential service to all colleagues which offers advice free of charge provided by Health Assured. This programme can be accessed by calling 0333 400 0545 and quoting 72167. The services are available covering a range of issues including non-work-related matters such as stress, family or relationship problems, harassment, bereavement, anxiety and depression, post-traumatic stress, and alcohol and drug problems.

7.0 Mental Health First Aiders

The Company realises the importance of mental health and has therefore invested in training up a number of colleagues to be mental health first aiders. There are colleagues trained in adult mental health across the country in all regions and there is a full list of all mental health first aiders available on the People Hub. Colleagues can contact any mental health first aider if they feel as though they ever need to talk to someone and will receive guidance on the best support that is available to them.

8.0 Policy Approval

Version	Approved By	Role	Date
1.0	Charlotte Bennett	UK & Europe People Director	01/04/2025
1.5	Charlotte Bennett	UK & Europe People Director	01/02/2026
2.0	Charlotte Bennett	Chief Transformation Officer	01/04/2026

9.0 Data protection

We process personal data collected in relation to complaints in accordance with our data protection policy. You should immediately report any inappropriate access or disclosure of employee data in accordance with our Data Protection Policy as this constitutes a data protection breach. It may also constitute a disciplinary offence, which we will deal with under our disciplinary procedure.

We're committed to helping you do your best work. Our promise is to champion diversity, build an inclusive culture and product, and do our part to create a more equitable world. We can't promise we'll always get it right, but we'll always put our people (that's you) first. If for any reason you would like to access or receive a copy of these policies in a different format, please contact our People Team.

We also always welcome any feedback that will help us with our commitments

A handwritten signature in black ink, appearing to read "P. Parker".

Phil Parker

Chief Executive Officer – Sunbelt Rentals Ltd

April 2026