

# Human Rights Policy Statement Boels Rental

## Modern Slavery Statement

Effective from: September 28, 2020 Last reviewed: January 29, 2024

Version 4.0

**Boels Rental recognizes responsibility to take a robust approach to slavery and human trafficking. We strongly oppose all forms of modern slavery. We respect all individuals' rights and condemn any involvement in matters that violate human dignity.**

**About us.** Founded in 1977 and with over 7,000 employees today, Boels Rental is the market leader in rental equipment in the Benelux, Central Europe, the Nordics and the Baltics. Our mission is to lead our markets by being our customers' rental partner of choice, by offering the best quality, the most sustainable equipment, and excellent customer service from our team of passionate people.

The Boels Group consists of four brands: Boels Rental, Cramo, IQ-Pass and Eekels Pompen. Boels Rental currently has 700+ branches across 19 countries - the Netherlands, Germany, Belgium, the United Kingdom, Luxembourg, Austria, the Czech Republic, Poland, Hungary, Italy, Slovakia, Switzerland, Italy, Sweden, Norway, Finland, Estonia, Lithuania, and Latvia. We also provide our services through DIY shop-in-shop locations. The head office of Boels Rental is located in Sittard, the Netherlands.

Next to General Rental, Boels and its brands have 11 specialized divisions – Industrial, Pumps, Site huts, Portable kitchens, Power & HVAC, Traffic Services, Building site logistics, Survey & laser, Party, Sanitation, and Access & security.

**Introduction.** This Human Rights Policy Statement is made in accordance with the European commission proposal on Corporate Sustainability Due Diligence Directive (CSDDD), the Responsible Business Conduct Act of the Netherlands, Germany's Supply Chain Due Diligence Act (IkSG), Norway's Transparency Act, the motion for the Austrian Supply Chain Act, the UK's Modern Slavery Act and the proposal of the Belgian Due Diligence Law.

We are committed to defending human rights (as defined in international treaties) and workplace and working relationship rights in our corporate activities as well as in our supply chains. We condemn all forms of human trafficking, exploitation, and forced labor and expect the same from our customers, business partners, suppliers, and any other party with whom we interact.

Wherever hereinafter reference is made to Boels Rental, this refers to: **Boels Topholding B.V. and all its subsidiaries throughout Europe.**

**Supply chain.** Our diverse business activities in each country encompass an extensive range of suppliers. Boels is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect and act ethically and within the law of their use of labor by agreeing and adhering to our [Supplier Code of Conduct](#).

Suppliers directly related to our core business can be categorized as follows:

- **Production of our equipment** – Boels does not manufacture any equipment itself. We buy our equipment primarily from original equipment manufacturers (OEM's).
- **Equipment maintenance and preparation** – Every Boels branch is responsible for preparing and maintaining its own fleet of equipment. Boels has professional technicians in place to perform maintenance work. However, in some occasions we may turn to outside sources for assistance or when specialized knowledge is needed. They are required to follow strict guidelines.
- **Equipment transport** – Boels delivers equipment to its customers on their work sites on a daily basis. A large part of the equipment transport is operated by in-house drivers and trucks. However, Boels also works with external contractors to outsource our equipment transport.
- **Equipment end-of-life management** – The Used Equipment division of Boels deals with the decommissioning and disposal of our equipment. Equipment is recycled or, if its condition allows it, refurbished and sold, all while strictly adhering to regional environmental standards.

To support Boels Rental's core business regarding Fleet Rental, Boels also offers work in the fields of IT, auxiliary services, consultancy, cleaning etc. through our indirect procurement office. The Boels Rental Real Estate department is responsible for new buildings, rental contracts, installations and maintenance of our premises.

Boels Rental will work with suppliers to ensure that they meet the standards of the Supplier Code of Conduct and improve their workers' working conditions and we endeavor to ensure that our suppliers adhere to the standards that we set ourselves.

Where an issue arises, it may be necessary for Boels to invoke sanctions against suppliers that fail to improve their performance in line with an action plan, or seriously violate our Supplier Code of Conduct. This may include the termination of the business relationship. Each case will be investigated separately.

**Policies and preventive measures.** We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our internal policies reflect our commitment to acting ethically and with integrity in all our business relationships. The organization operates the following policies and preventive measures that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery, human trafficking and other ethics issues in its operations and value chain.

1. **Sustainability Policy** – States that we respect human rights throughout the value chain and that we support the Ten Principles of the United Nations Global Compact in respect to human rights, labor, environment, and anti-corruption. An active collaboration with our customers, suppliers and other stakeholders is the key to the further development of sustainable rental solutions.
2. **Business Code of Conduct** – Boels' [Employee Code of Conduct](#) makes it clear to employees what the expected actions and behaviours are when representing the organization. The organization strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain. All employees are required to sign the Business Code of Conduct and participate in the e-learning.
3. **Supplier Code of Conduct** – Boels expects all suppliers to read and comply with the principles in the Supplier Code of Conduct as a condition of doing business with Boels. Significant business partners need to sign the Supplier Code of Conduct. If suppliers use subcontractors for the production of our products or services, it is the responsibility of that supplier to ensure that all subcontractors throughout the supply chain comply with these requirements.
4. **Whistleblowing policy** – Boels encourages all its workers, customers, suppliers and other business partners to report any compliance violations (or suspicion thereof) related to Boels' direct activities in its supply chains. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Boels' whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation [Employees](#) customers, or others who have concerns can report these via our [SpeakUp platform](#)
5. **Risk analysis** – supplier risk assessment based on spent, operational categories and countries they operate in related to reported human rights and environmental indices.
6. **Employee on-boarding** – We make all employees aware of their working hours, working time regulations, holiday and leave entitlements and all other entitlements via the employee handbook and introduction.
7. **Recruitment agency policy** – Boels only sources external employees from specified, reputable employment agencies and always verifies the practices of any new agency before accepting workers from that agency.
8. **Training** – we are committed to ensuring all relevant employees are trained on any legislative requirements which impact our business (e.g. e-learning for Business Code of Conduct).
9. **HR and H&S** – Each business unit across our organization has a dedicated human resources and health and safety function to provide continuous support and guidance.
10. In group level, there is an age limit 16 years for **Young Workers**, however the limit may be higher depending on local laws and regulations. Young Workers are temporarily employed employees, usually helping workers and students. To protect Young Workers, legal restrictions have been put in place, which we monitor closely.
11. **Freedom of association and collective bargaining** – depends on the local laws and regulations. Percentage of total number of employees who are covered by collective bargaining agreements are reported in annual reports.

**Due diligence processes.** We are committed to continuously developing our due diligence processes on group level. We have dedicated Fleet Excellence and Indirect Procurement Compliance and Excellence teams in place to develop and implement related policies and procedures. We have raised awareness of these issues with colleagues who manage this supplier vetting process.

We conduct human-rights risk assessments across our value chain to identify risk to people and environment. For existing suppliers, risk assessment is carried out based on spent, country- and sector-specific risks (based on available public databases). We target high-risk regions and highest spent - high risk category suppliers will need to go through self-assessment questionnaire.

Our new, potential suppliers will undergo the evaluation and signing of Supplier Code of Conduct before we enter into a business partnership with them. The type of due diligence method depends on the risk assessment performed at the initial stage of potential engagement. Our risk assessment and evaluation of human rights and related risks is based on criteria such as the country of operation and government response. Those potential suppliers identified as critical, very high or high risk are subject to further vetting and evaluation based on the specific supplier's circumstances. This includes higher risk and higher spend suppliers, who will be asked as part of a questionnaire about their policies and procedures in place regarding human rights, modern slavery, forced labour, child labour, human trafficking, environment etc.

If we become aware of a violation or weak performance as results of self-assessments, we take appropriate steps and measures to assure supplier compliance, including remedial measures. We prioritize human rights and environment-related risks identified on the basis of the risk analysis.

**Measuring effectiveness through Key Performance Indicators.** Boels Group has set targets by 2025 to measure the effectiveness on social responsibility:

- 86% of total fleet CAPEX spend covered by Supplier Code of Conduct
- 0 legal proceedings (human rights, discrimination and sexual harassment, environment and anti-corruption)
- 100% of employees trained for the Business Code of Conduct



Pierre Boels  
CEO Boels Group

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Share of critical suppliers managed by group sourcing that has been subject to anti-corruption, human rights, H&S and environmental risk assessment is currently under development.

**Reporting and obligation to provide information.**

Boels Rental reports due diligence process annually in group financial report under sustainability section. Local level requirements (e.g. German Due Diligence Law and Norwegian Transparency Act) are reported separately in local languages and according to requested disclosures in respective regulations.

The report must at least state in a comprehensible manner, general description of the company's due diligence processes, information about actual negative consequences and material risk of negative consequences that the business has uncovered through its due diligence assessments, information about remedial measures, and the effectiveness of those measures.

Boels Rental is obliged to provide the competent authority and other related parties, upon request, with the information and documents necessary to carry out the tasks assigned to it by international or national law regarding to due diligence. The company shall provide information within a reasonable time, in accordance with the legal timeframes.