

# AER Rents

## Modern Slavery and Human Trafficking Statement



## Policy Statement

This statement is in accordance with Section 54(1) of the UK Modern Slavery Act (2015) sets out AER Rents Limited and our group of companies' actions to understand all potential modern slavery risks related to our business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own businesses and our supply chains. This statement relates to actions and activities during the financial year ending December 2026.

At AER Rents Ltd we respect human rights and do not tolerate any form of modern slavery or bullying. We recognise that every supply chain is at risk of modern slavery, and it is our responsibility to ensure that we understand these risks and work in partnership with our suppliers to mitigate them.

We do not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

As part of the plant hire and sales industry, we recognise that we have a responsibility to take a robust approach to slavery and human trafficking. Our organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

**Gavin Pitt, Chief Executive Officer**

1<sup>st</sup> January 2026

## Our Organisational structure and supply chains

This statement covers the activities of the AER Rents Limited group of companies trading under MPH Plant & Sales, Hudson Lifting Equipment, Welfare 4 Hire, Chippindale Plant, Mainline and DHS Hire and Sales and operating across the plant hire and sales sector with over 340 employees working directly for group companies:

To be able to respond to and assist our clients at short notice, our supply chain is varied and extends to sub-contractors who provide a service to our companies, where we pay particular attention to the risk of modern slavery.

To conduct our business effectively we rely on a number of manufacturers, suppliers, and distributors which, in turn, will source products from their respective supply chains.

## Countries of operation and supply

We currently operate in the following countries:

- United Kingdom
- Ireland

## Our Approach

The following is the process by which the companies assesses whether particular activities or countries are high risk in relation to slavery or human trafficking:

Given our predominantly direct employment model, there is less risk of modern slavery in our own business than through our supply chain. To prevent modern slavery and human trafficking however, we have implemented the following preventative measures:

- Employee Engagement: We have communicated our Modern Slavery & Human Trafficking Policy to our employees to ensure that they are vigilant to potential threats.
- HR Due Diligence: Right to Work Checks: As part of our onboarding process for new employees, we conduct right to work checks in accordance with Government requirements; and,
- We also review bank account details supplied to ensure that they correspond with the name of the employee and that any discrepancies are fully investigated, including any instances of multiple salaries being paid into a single bank account.

## High-risk activities

Our business has a high percentage of direct employees as opposed to relying on subcontractors or agency workers which allows us the benefit of a high level of oversight of our workforce and of our procedures.

Where subcontractors and suppliers are used however, these individuals and/or organisations are required to confirm the actions that they are taking to ensure labour exploitation, modern slavery and human trafficking are not taking place in any part of their business or supply chain. We continue to work to increase visibility of supply chains operations outside the UK.

Subcontractors are challenged when first obtaining 'Approved Supplier' status and may be subject to periodic audits by our Managing Directors to ensure that these standards are maintained throughout their partnership with our businesses.

We expect our suppliers to:

- ensure that employees are engaged under fair terms with reasonable pay and for all employees to have a written contract of employment.
- prohibit any type of harassment including physical or verbal abuse, threats, and bullying.
- ensure employees' working hours comply with national laws and industry specific regulations.
- prohibit forced, bonded or compulsory labour so that employees are free to leave their employment after reasonable notice.
- ensure that there is no worker requirement to lodge deposits or identity papers, and that no person has had to pay any direct or indirect fees to obtain work.

- allow all employees freedom to join, or not to join an employee representative body.
- ensure that health and safety and environmental risks are identified, minimised, managed; and
- meet the Minimum Standard for Labour Providers to tackle modern slavery.

## Responsibility

Responsibility for our anti-slavery initiatives are as follows;

**Policies:** Our Head of HR is responsible for compiling and reviewing our company policies in compliance with relevant legislation. Our policies are also peer reviewed by our Senior Leadership team and legally reviewed by our external legal counsel.

**Risk assessments:** Head of HR will complete an annual review of the organisation's position on responsibility for human rights and analysis of modern slavery risks.

**Investigations/due diligence:** Our Senior Leadership Team is responsible for investigations and due diligence in relation to known or suspected instances of slavery and human trafficking.

**Training:** All relevant employees receive the required eLearning module on modern slavery and human trafficking.

## Relevant policies

We operate the following policies that describe our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

**Whistleblowing policy** We encourage all our employees, workers, customers, and other business partners to report any concerns related to the direct activities or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our 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 to our Whistleblowing Officer (Head of HR) in line with our Whistleblowing Policy.

**Dignity at Work** Our Dignity at Work guidance (as laid out in our employee handbooks), makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to maintain the highest standards of employee conduct and ethical behaviour.

**Supplier code of conduct** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are expected to provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We collaborate with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship. We request that companies who are required to produce an Anti-Slavery policy supply us with the policy as part our contractor approval process.

Companies who are not required to produce an Anti-Slavery policy statement are asked to agree that we may undertake Anti-Slavery audits where we believe there is any due cause to do so.

**Recruitment Standard Operating Procedure** We use only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency through our procurement process.

## Performance indicators

We require all senior managers and hiring managers to have re-fresher training on modern slavery by October 2026.

## Training

We require all supply chain and sales managers within our organisation to complete training on modern slavery.

Our modern slavery training covers:

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within our businesses.
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority.

## Awareness-raising programme

As well as training staff, we are raising awareness of modern slavery issues by delivering toolbox talks.

The toolbox talk explains to staff:

- The basic principles of the Modern Slavery Act 2015.
- How employers can identify and prevent slavery and human trafficking.
- What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within our organisation; and
- What external help is available, for example through the Modern Slavery Helpline.

## AER Board approval

This statement is made in pursuance of s.54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year. It was approved on 1<sup>st</sup> January 2026 by our AER CEO.

CEO's signature:

