

**WILLSCOT ■ MOBILE MINI**  
HOLDINGS CORP



**VENDOR/SUPPLIER CODE OF CONDUCT**

**INTRODUCTION**

WillScot Mobile Mini's commitment to maintaining the highest ethical standards starts at the top and resides with every employee. WillScot Mobile Mini's continued success depends upon fostering a culture in which our vendors reinforce our values, and we expect our vendors to operate in compliance with the principles outlined in this Vendor Code of Conduct (this "Code"). The term "Vendors" (individually, a "Vendor"), as used in this Code, means any Supplier, affiliate, subsidiary, employee, agent, subcontractor, or other representative of an entity that provides goods or services to, or on behalf of, WillScot Mobile Mini Holdings Corp., its subsidiaries and/or affiliates, including Williams Scotsman, Inc., (collectively, "WSMM").

The provisions of this Code are in addition to those specified in any agreement between a Vendor and WSMM. Failure to comply with the terms of this Code may jeopardize a Vendor's relationship with WSMM, up to and including termination of some or all of the services being provided by a Vendor to WSMM.

**EMPLOYMENT AND LABOR**

**Human Rights:** Vendors shall (i) treat all of their workers fairly and with dignity, (ii) adopt an approach to human rights consistent with the United Nations Universal Declaration of Human Rights, and the International Labor Organization's Declaration of Fundamental Principles and Rights at Work. (iii) support and respect the protection of internationally proclaimed human rights, and (iv) ensure that they are not complicit in human rights abuses.

**Freedom of Association:** Where legally authorized, Vendors shall respect their employees' rights and freedom of association to join or form trade unions and to bargain collectively, or to conduct similar activities.

**Employment Practices:** Vendors shall not (i) use any form of slave, forced, bonded, indentured, or involuntary labor, and shall fully comply with all laws that prohibit the use thereof, as and when applicable,

(ii) engage in human trafficking or exploitation, (iii) import goods tainted by slavery or human trafficking, or (iv) retain employees' government-issued identification, passports or work permits as a condition of employment.

**Anti-discrimination, Equal Opportunity:** Vendors shall provide a workplace free of harassment and discrimination in which their employees are treated fairly and respectfully. In the United States, vendors shall make good faith efforts to identify and, where available and appropriate, use suppliers certified as minority, women, disabled person, lesbian, gay, bi-sexual, transgender and/or U.S. veteran-owned.

**Underage Labor:** Vendors shall not use underage labor as defined by applicable law regulating minimum legal age to work. Workers below the age of 18 shall not be employed in jobs that are likely to jeopardize the health and safety of young workers.

**Employment Status:** Vendors shall employ only workers who are legally authorized to work in their location. Vendors are responsible for validating employees' work eligibility status.

**Compensation and Working Hours:** Vendors shall provide all workers with accurate information about their wages, mandated benefits, and any other basis of their compensation. Vendors shall comply with applicable labor laws governing working hours and employee compensation in all locations in which they operate.

## **CULTURE OF ETHICS**

**Business Integrity:** Vendors shall exercise high standards of integrity in business interactions, and all of their business dealings shall be accurately reflected in their books and records in accordance with applicable laws. Vendors shall implement appropriate procedures designed to prevent bribery, corruption, kickbacks, and embezzlement.

**Intellectual Property and Software:** Vendors shall respect all intellectual property rights and software licensing obligations and use technology only in a manner that protects, and is in compliance with, the owner's intellectual property rights.

**Privacy:** Vendors shall comply with all applicable privacy and information security laws and regulatory requirements relating to the collection, storage, processing, transfer and sharing of personal information. Vendors shall safeguard the privacy of the personal information of their customers and employees.

**Whistleblower Protection and Anonymous Complaints:** Vendors shall protect the confidentiality of their whistleblower employees, prohibit retaliation, and, where legally permitted, provide an anonymous complaint mechanism for their employees to report grievances.

**Gifts, Meals and Entertainment:** Vendors shall not provide any gift, meal or entertainment to an WSMM employee in any situation which might improperly influence, or appear to improperly influence, such employee's decision in relation to a Vendor.

**Responsible Sourcing of Minerals:** Vendors shall comply with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas and any domestic laws related to such guidance.

**Conflicts Minerals:** Vendors shall be aware of and comply with Conflicts Minerals requirements as adopted in the Dodd-Frank Wall Street Reform and Consumer Protection Act. Vendors shall undertake reasonable due diligence with their suppliers to identify whether any of the products supplied to WillScot contain 3TGs sourced from the DRC and, if so, whether the mines and smelters identified are certified as "conflict free" by an independent third party.

## **HEALTH, SAFETY, & ENVIRONMENT**

**Health and Safety:** Vendors shall: (i) provide their employees with a safe workplace, (ii) have reasonable procedures to detect, prevent and handle potential risks to the health, safety and security of employees, and (iii) follow all applicable laws relating to health and safety in the workplace.

**Environment:** Vendors shall acknowledge the environmental impact of the products and services, and shall operate in an environmentally responsible manner, strive to minimize adverse impact on the environment and comply with all environmental laws in the countries in which they operate. Vendors shall strive to comply with WSMM's Environmental Policy.

## **REPORTING CONCERNS**

If a Vendor becomes aware of or suspects misconduct relating to services rendered to, or on behalf of, WSMM, or a violation of this Code, then Vendor will report it to the appropriate WSMM point of contact. If a Vendor suspects that an WSMM employee has been acting in less than full compliance with law and ethical business practices, then please contact (anonymously, if so desired and where legally permitted) the WSMM Ethics Helpline at: 1-888-399-0403

By mail: VP of Internal Audit  
WillScot Mobile Mini Holdings Corp.  
4646 East Van Buren, Suite 400  
Phoenix, AZ 85008

Or

Chairman of the Audit  
Committee Board of Directors  
c/o WillScot Mobile Mini Holdings  
Corp. 4646 East Van Buren, Suite 400  
Phoenix, AZ 85008

By internet: <https://secure.ethicspoint.com/domain/media/en/gui/21342/index.html>