

Ashtead Group Plc Retirement Benefits Plan

Engagement Policy Implementation Statement (“EPIS”)

Ashtead Group plc Retirement Benefits Plan (the “Plan”)

Plan Year End – 30 April 2023

The purpose of the EPIS is for the Trustee of the Ashtead Group plc Retirement Benefits Plan to explain what we have done during the year ended 30 April 2023 to achieve certain policies and objectives set out in the Statement of Investment Principles (“SIP”). It includes:

1. How our policies in the SIP about asset stewardship (including both voting and engagement activity) in relation to the Plan’s investments have been followed during the year; and
2. How we have exercised our voting rights or how these rights have been exercised on our behalf, including the use of any proxy voting advisory services, and the ‘most significant’ votes cast over the reporting year.

Our conclusion

Based on the activity we have undertaken during the year, we believe that the policies set out in the SIP have been implemented effectively.

During the year, the Plan disinvested from those funds with voting rights and we decided that those holdings are no longer material. As a consequence, we have not reported on any voting rights that were exercised on our behalf this year.

In our view, the Plan’s material investment managers were able to disclose good evidence of engagement activity, and the activities completed by our managers align with our stewardship expectations.

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How engagement policies have been followed

The Plan is invested in pooled funds and the responsibility for voting (where relevant) and engagement has been delegated to the Plan's investment managers. We reviewed the stewardship activity of the material investment managers carried out over the Plan year and, in our view, the investment managers were able to disclose good evidence of engagement activity. More information on the stewardship activity carried out by the Plan's investment managers can be found in the following section of this report.

Over the reporting year, we monitored the performance of the Plan's investments on a quarterly basis and received updates on important issues from our investment adviser, Aon Investments Limited ("Aon"). In particular, we received quarterly Environment Social Governance ("ESG") ratings from Aon for the funds the Plan is invested in, where available.

The Plan's stewardship policy can be found in the SIP:
<https://www.sunbeltrentals.co.uk/our-policies/>

What is stewardship?

Stewardship is investors using their influence over current or potential investees/issuers, policy makers, service providers and other stakeholders to create long-term value for clients and beneficiaries leading to sustainable benefits for the economy, the environment and society.

This includes prioritising which ESG issues to focus on, engaging with investees/issuers, and exercising voting rights.

Differing ownership structures means stewardship practices often differ between asset classes.

Source: UN PRI

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Investment managers' engagement activity

Engagement is when an investor communicates with current (or potential) investee companies (or issuers) to improve their ESG practices, sustainability outcomes or public disclosure. Good engagement identifies relevant ESG issues, sets objectives, tracks results, maps escalation strategies and incorporates findings into investment decision-making.

The table below shows some of the engagement activity carried out by the Plan's material managers. The managers have provided information for the most recent calendar year available.

Funds	Number of engagements		Themes engaged on at a fund-level
	Fund specific	Firm level	
Insight – Short Dated Buy and Maintain Bond Fund	130	948	Environment - Climate change, Net Zero strategies, Emissions Social - Conduct, culture and ethics (e.g. tax, anti-bribery, lobbying) Governance – Board effectiveness – Diversity, Remuneration
Barings – Global Loan Fund	476	760	Environment - Natural resource use/impact (e.g. water, biodiversity), Climate change Social - Human capital management (e.g. inclusion & diversity, employee terms, safety), Public health Governance - Board effectiveness – Diversity Strategy, Financial and Reporting – Risk management (e.g. operational risks, cyber/information security, product risks), Reporting (e.g. audit, accounting, sustainability reporting), Strategy/purpose

Source: Managers

Data limitations

This report does not include commentary on the Plan's investment in liability driven investments/gilts or cash because of the limited materiality of stewardship to these asset classes.