

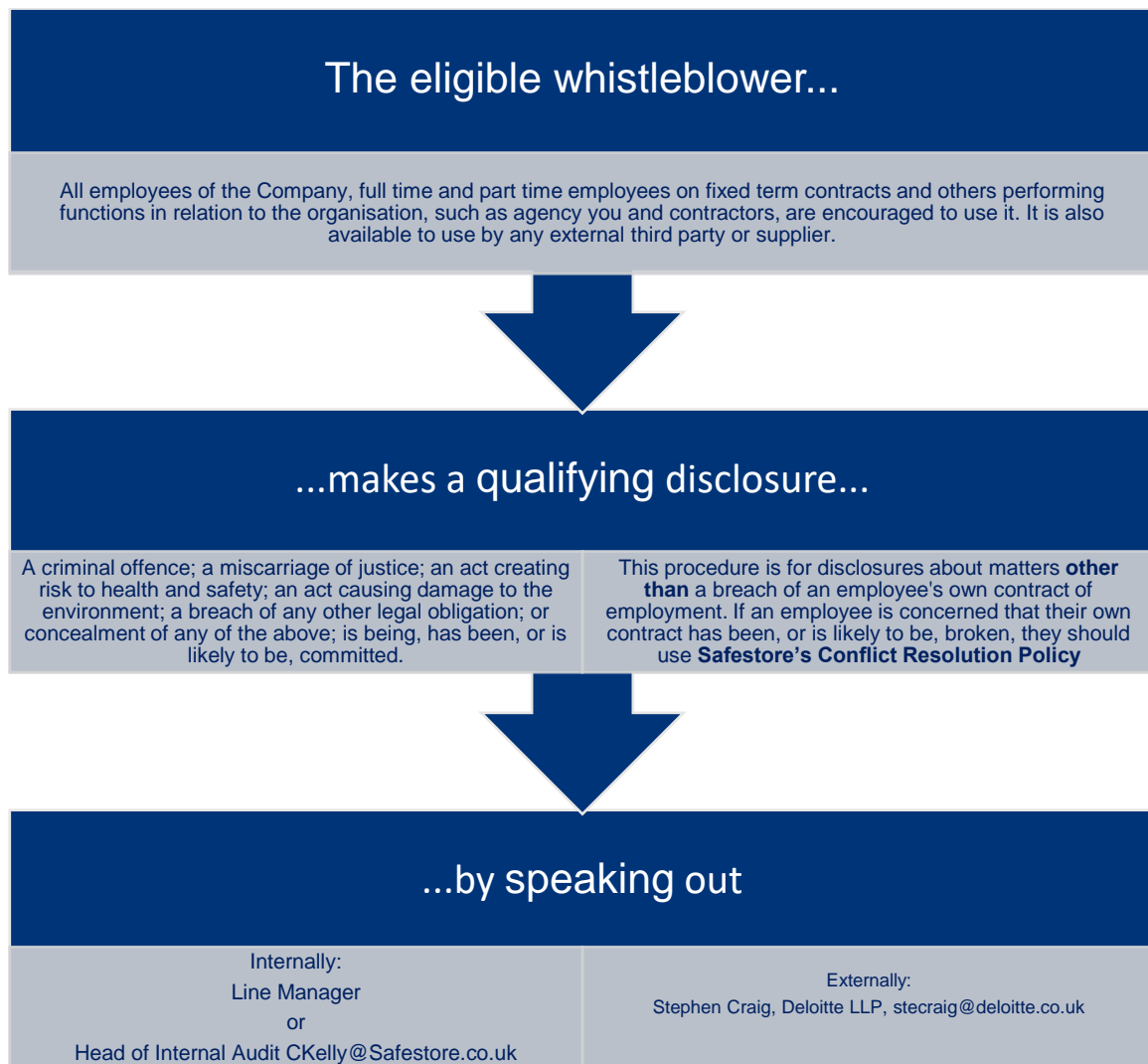
# Whistleblowing (Speak Out) Policy

## Introduction

It is important to Safestore that any fraud, misconduct or wrongdoing is reported and properly dealt with. We therefore encourage you to raise any concerns that you may have about the conduct of others in the business or the way in which the business is run. This policy sets out the way in which you may raise any concerns that you have and how those concerns will be dealt with.

**This policy applies to anyone working for Safestore or on our behalf in any capacity including employees (permanent and temporary), workers, directors, officers, seconded workers, volunteers, agents, contractors, and external consultants.**

## Summary of our Whistleblowing process



# Whistleblowing (Speak Out) Policy

## Principles

- Everyone should be aware of the importance of preventing and eliminating wrongdoing at work. You should be watchful for illegal or unethical conduct and report anything of that nature that you become aware of.
- Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the person who raised the issue.
- No individual will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the individual will not be prejudiced because they have raised a legitimate concern.
- Victimisation of an individual for raising a qualified disclosure will be a disciplinary offence.
- If misconduct is discovered as a result of any investigation under this procedure Safestore's disciplinary procedure will be used, in addition to any appropriate external measures.
- An instruction to cover up wrongdoing is itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority such as a manager, you should not agree to remain silent.

This procedure is for disclosures about matters **other than** a breach of your own contract of employment. If you are concerned that your own contract has been, or is likely to be, broken, you should use **Safestore's Conflict Resolution Policy**.

## Background

The law provides protection for people who raise legitimate concerns about specified matters. These are called "qualifying disclosures". A qualifying disclosure is one made in the public interest by someone who has a reasonable belief that:

- a criminal offence;
- a miscarriage of justice;
- an act creating risk to health and safety;
- an act causing damage to the environment;
- a breach of any other legal obligation; or
- concealment of any of the above;

is being, has been, or is likely to be, committed. It is not necessary for you to have proof that such an act is being, has been, or is likely to be, committed - a reasonable belief is sufficient. You have no responsibility for investigating the matter - it is Safestore's responsibility to ensure that an investigation takes place.

Someone who makes such a protected disclosure has the right not to be dismissed, subjected to any other detriment, or victimised, because they have made a disclosure.

Safestore encourages colleagues to raise concerns under this procedure in the first instance. If you are not sure whether or not to raise a concern, you should discuss the issue with your line manager or the HR department.



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## Procedure

### Stage one

In the first instance, any concerns should be raised with your line manager.

If you believe your line manager to be involved, or for any reason you do not wish to approach your line manager, then you should proceed straight to stage 3.

### Stage two

Your line manager will arrange an investigation into the matter (either by investigating the matter personally or immediately passing the issue to someone in a more senior position).

The investigation may involve you and other individuals giving a written statement. Any investigation will be carried out in accordance with the principles set out above.

If disciplinary action is required, the person who carried out the investigation will report the matter to the human resources department and start the disciplinary procedure.

If appropriate, the person who carried out the investigation will then report to the board, which will decide on any further necessary action, including reporting the matter to any appropriate government department or regulatory agency.

On conclusion of any investigation, you will be told the outcome of the investigation and what the board has done, or proposes to do, about it. If no action is to be taken, the reason for this will be explained.

### Stage three

If you are concerned that your line manager is involved in the wrongdoing, has failed to make a proper investigation or has failed to appropriately report the outcome of the investigations, you should inform:

- Chris Kelly, Head of Internal Audit (at CKelly@safestore.co.uk) or
- Ian Krieger, Non-Executive Director and the Chair of the Audit Committee (at ikrieger@safestore.co.uk)

Arrangements will then be made for another manager to review the investigation carried out, make any necessary enquiries and make their own report to the Board as in stage 2 above.

If, for any other reason, you do not wish to approach your line manager you should also in the first instance contact one of the above-named individuals. Which of these individuals is the most appropriate will depend on the seriousness of the malpractice and who you think is involved.

All reports will be treated with the strictest confidence and your identity will not be disclosed without your prior consent.

### Raising concerns externally (exceptional cases)

Stages 1-3 set out how to raise and remedy your concerns internally. Ideally you will feel able to make your disclosure through the above procedure and we always encourage you to raise concerns under this procedure in the first instance.



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However, where there are special circumstances when you feel unable to use Safestore's procedure, you may wish to consider contacting Deloitte LLP, the group's external auditors:

Stephen Craig (stecraig@deloitte.co.uk)  
Deloitte LLP  
2 New Street Square  
London  
EC4A 3BZ

The law recognises that in some circumstances it may be appropriate for you to report your concerns to an external body such as a regulator. In these circumstances, you can seek your own legal advice, or tell a [prescribed person or body](#).

## Malicious allegations

We want to encourage a culture of openness and to support whistleblowers who raise genuine concerns under this policy, even if they turn out to be mistaken. However, just as we will seek to protect those who raise genuine concerns, we will also protect those against whom claims are made, where the person raising the claim does so maliciously, knowing it to be untrue. If we conclude that you have made false allegations maliciously, or with a view to personal gain, you may be subject to disciplinary action in accordance with our disciplinary policy.

## Data protection

When you make a disclosure, Safestore will process any personal data collected in accordance with our data protection policy. Data collected from the point at which you make the report is held securely and accessed by, and disclosed to, individuals only for the purposes of dealing with the disclosure.

