

# Safestore Anti-Bribery Statement

Safestore is committed to applying the highest standards of ethical conduct and integrity in its business activities in the UK and overseas. Every employee, officer and individual acting on Safestore's behalf is responsible for maintaining our reputation and for conducting company business honestly and professionally.

Safestore considers that bribery, tax evasion and corruption has a detrimental impact on business by undermining good governance and distorting free markets.

Transparent, fair conduct helps to foster deeper relationships of trust between Safestore and its business partners, stakeholders and customers. It is vital for our reputation and future growth.

Safestore does not tolerate any form of bribery, whether direct or indirect, by, or of, its employees, officers, agents or consultants or any persons, firms or companies acting for it or on its behalf. The board and senior management are committed to implementing and enforcing effective systems throughout Safestore to prevent, monitor and eliminate bribery, in accordance with the Bribery Act 2010.

Safestore has a zero tolerance approach to all forms of tax evasion, whether under UK law or under the law of any foreign country.

Employees and Associated Persons (contractors, sub-contractors, suppliers, consultants etc.) of the Group must not knowingly engage in activities which:

- (a) cause the Group to commit a tax evasion offence; or
- (b) facilitate a tax evasion offence by a third party.

We are committed to implementing and enforcing effective systems to counter tax evasion facilitation, in accordance with the Criminal Finances Act 2017. At all times, business should be conducted in a manner such that the opportunity for, and incidence of, tax evasion is prevented.

Safestore operates an Anti-corruption and bribery policy, outlining our position on preventing and prohibiting bribery and the facilitation of tax evasion, available on the staff intranet. The Anti-corruption and bribery policy applies to all officers and employees, as well as agency workers, consultants and contractors. All employees and other individuals acting for Safestore are required to familiarise themselves and comply with our Anti-corruption and bribery policy.

A bribe is a financial advantage or other reward that is offered to, given to, or received by an individual or company (whether directly or indirectly) to induce or influence that individual or company to perform public or corporate functions or duties improperly.

Employees, officers and others acting for or on behalf of Safestore are strictly prohibited from making, soliciting or receiving any bribes or unauthorised payments.

As part of our anti-bribery measures, we are committed to transparent, proportionate, reasonable and bona fide hospitality and promotional expenditure. Such expenditure must be authorised in advance, in accordance with the procedures set out in Safestore's Anti-corruption and bribery policy and Safestore's Gifts, Tips and Hospitality Policy.

Tax evasion means an offence of cheating the public revenue or fraudulently evading tax either in the UK or in a foreign country, and is a criminal offence. The offence requires an element of fraud, which means there must be deliberate action, or omission with dishonest intent.



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Tax evasion facilitation means being knowingly concerned in, or taking steps with a view to, the fraudulent evasion of tax (whether UK tax or tax in a foreign country by another person, or aiding, abetting, counselling or procuring the commission of that offence. Tax evasion facilitation is a criminal offence, where it is done deliberately and dishonestly.

A breach of Safestore's Anti-corruption and bribery policy by an employee will be treated as grounds for disciplinary action, which may result in a finding of gross misconduct, and lead to summary dismissal. Employees, officers and other individuals acting for Safestore should note that bribery is a criminal offence that may result in up to 10 years' imprisonment and/or an unlimited fine for the individual and an unlimited fine for Safestore.

Safestore will not conduct business with service providers, agents or representatives that do not support our anti-bribery and anti-facilitation of tax evasion objectives. Safestore reserves the right to terminate its contractual arrangements with any third parties acting for, or on behalf of, Safestore with immediate effect where there is evidence that they have committed or knowingly facilitated or condoned acts of bribery or tax evasion.

The success of our anti-bribery/tax evasion measures depends on all employees, officers and those acting for Safestore, playing their part in helping to detect and eradicate bribery/tax evasion. Therefore, all employees, officers and others acting for, or on behalf of, Safestore are encouraged to report any suspected bribery/tax evasion activity in accordance with the procedures set out in the Anti-corruption and bribery policy. Safestore will support any individuals who make such a report, provided that it is made in good faith.

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