

Safestore Anti-Bribery and Corruption (ABC) Statement

Safestore are committed to conducting our business with the highest standards of integrity, honesty, and transparency. We have zero tolerance for bribery and corruption in any form, in any jurisdiction where we operate. This Anti-Bribery and Corruption Statement reflects our commitment to ethical business practices and compliance with all applicable anti-bribery and anti-corruption laws, including but not limited to the UK Bribery Act 2010, the Criminal Finances Act 2017, and relevant EU legislation such as the EU Whistleblower Protection Directive (2019/1937) and national anti-corruption laws in the countries where we operate.

This statement applies to all employees, officers, directors, contractors, agents, consultants, and any other third parties acting on behalf of the Company, is intended to meet the standards of both UK and EU regulatory frameworks and is applicable across all jurisdictions in which Safestore operates. The principles set forth in this statement must be adhered to at all times in all business dealings and relationships.

Definitions

Bribery: The offering, giving, receiving, or soliciting of anything of value (such as money, gifts, or favours) to influence the actions of an individual in a position of authority.

Corruption: The abuse of entrusted power for private gain, which can take many forms, including bribery, extortion, fraud, and money laundering.

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

Tax evasion facilitation: The act of assisting, enabling, or encouraging another individual or entity to engage in tax evasion, whether UK tax or tax in another country.

Safestore's Commitment

We will not tolerate any form of bribery or corruption, whether direct or indirect, and will take immediate action against those involved in such activities.

We will comply with all applicable anti-bribery and anti-corruption laws in every country where we operate. This includes maintaining accurate books and records and implementing effective internal controls to prevent and detect bribery and corruption.

We will conduct our business with integrity, fairness, and respect for all our stakeholders, including customers, suppliers, employees, and the communities in which we operate.

We will implement and enforce effective systems to counter tax evasion and the facilitation of tax evasion, in accordance with all legislation and applicable guidelines in the jurisdictions in which we, our clients, our suppliers and our business partners operate. At all times, business will be conducted in a manner such that the opportunity for, and incidence of, tax evasion is prevented.



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Prohibited Activities

The following activities are strictly prohibited:

Offering or Accepting Bribes: No employee or third party acting on behalf of Safestore may offer, give, or accept bribes or any other improper payments, whether in cash or in-kind, to or from any individual or entity, including government officials, customers, suppliers, or business partners.

Facilitation Payments: Safestore prohibits the making of facilitation payments, which are small payments made to expedite or secure the performance of a routine governmental action.

Gifts, Tips and Hospitality: While the exchange of modest gifts and hospitality may be acceptable in some cultures, they must never be intended to influence a business decision or gain an unfair advantage. All gifts and hospitality must be transparent, proportionate, and properly recorded, in accordance with Safestore's Gifts, tips and hospitality policy.

Third-Party Involvement: Safestore will not engage third parties to perform actions that we are not permitted to do directly. We will conduct due diligence on all third parties we engage to ensure they comply with our anti-bribery and corruption standards.

Engaging in or facilitating Tax Evasion: No employee or third party acting on behalf of Safestore may engage in any form of tax evasion, either directly or indirectly. Safestore prohibits the facilitation of tax evasion, including advising, assisting, or enabling others to evade taxes.

Misrepresentation: No employee or third party acting on behalf of Safestore may knowingly provide false or misleading information to tax authorities.

Offshore Tax Evasion Schemes: Safestore prohibits the use of offshore accounts or entities designed to conceal income or assets from tax authorities.

Responsibilities

Every employee is responsible for understanding and complying with this statement, and relevant anti-bribery and corruption laws. Managers must also lead by example and foster a culture of integrity and compliance.

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. Safestore will support any individuals who make such a report, provided that it is made in good faith.

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.



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Reporting and Whistleblowing

Employees and third parties are encouraged to report any concerns or suspicions of bribery or corruption in accordance with Safestore's Whistleblowing (Speak Out) policy. Reports can be made anonymously, and Safestore will investigate all reports thoroughly. Retaliation against anyone who reports a concern in good faith is strictly prohibited.

Consequences of Non-Compliance

Non-compliance with this statement may result in severe consequences, including disciplinary action, termination of employment, and legal prosecution. Safestore will cooperate fully with law enforcement authorities in the investigation and prosecution of any violations of anti-bribery and corruption laws.

Training and Communication

Training on this statement and Safestore's internal policy forms part of the induction process for all individuals who work for us, and regular training will be provided as necessary.

This statement will be accessible internally through Safestore's intranet in multiple languages, as well as being posted on Safestore's external website in English.

