

Anti- Bribery and Corruption (ABC) Policy

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero tolerance approach to bribery, tax evasion and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery and corruption.

We will uphold all laws relevant to countering bribery, tax evasion and corruption, including the Bribery Act 2010, the Criminal Finances Act 2017 , and relevant anti-corruption and anti-tax evasion legislation applicable in the EU member states in which we operate.

About this policy

The purpose of this policy is to:

- set out our responsibilities, and of those working for us, in observing and upholding our position on bribery, tax evasion and corruption; and
- provide information and guidance to those working for us on how to recognise and deal with bribery, tax evasion and corruption activity.

It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished by up to ten years' imprisonment and/or a fine. As an employer, if we fail to prevent bribery we can face an unlimited fine, exclusion from tendering for public contracts, and cause damage to our brand and reputation in the public domain.

A criminal offence is automatically committed by the Group where tax evasion is facilitated by a person acting on behalf of Safestore. If we fail to prevent our employees, workers, agents or service providers from facilitating tax evasion, Safestore can face corporate criminal sanctions including an unlimited fine, as well as exclusion from tendering for public contracts and damage to our reputation. The Group does not have to have deliberately or dishonestly facilitated the tax evasion itself; the fact that someone has done so on its behalf creates the liability for Safestore.

We therefore take our legal responsibilities seriously.

In this policy, **third party** means any individual, firm, company or organisation you come into contact with during the course of your work for us, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

Does this policy apply to you?

This policy applies to everyone working for Safestore Group or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located.



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What are bribery, tax evasion and corruption?

Bribery is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage.

An **advantage** includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value.

A person acts **improperly** where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organisation of any kind.

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

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 another 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.

Corruption is the abuse of entrusted power or position for private gain.

Examples:

Offering a bribe: You offer a potential customer tickets to a major sporting or live music event, but only if they agree to do business with us.

This would be an offence as you are making the offer to gain a commercial and contractual advantage. We may also be found to have committed an offence because the offer has been made to obtain business for us. It may also be an offence for the potential customer to accept your offer.

Receiving a bribe: A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence in our organisation to ensure we continue to do business with them.

It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

Bribing a foreign official: You arrange for the business to pay an additional "facilitation" payment to a foreign official to speed up an administrative process, such as clearing our goods through customs.

The offence of bribing a foreign public official is committed as soon as the offer is made. This is because it is made to gain a business advantage for us. We may also be found to have committed an offence.



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Tax evasion: A customer operates an online business from a Safestore store and deliberately decides not to disclose this to the tax authorities, resulting in Tax not being paid.

Tax evasion facilitation: A store colleague becomes aware that the customer has deliberately decided to evade Tax by not disclosing the existence of their online business to the tax authorities and decides not to report this to their line management.

What you must not do

It is not acceptable for you (or someone on your behalf) to:

- give, promise to give, or offer, a payment, gift or hospitality with the expectation or hope that a business advantage will be received, or to reward a business advantage already given;
- accept gifts, tips or hospitality during an active procurement process where the supplier or prospective supplier offering the gift is tendering for the contract;
- accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that it will provide a business advantage for them or anyone else in return;
- engage in any activity that might lead to a breach of Safestore's Gifts, Tips and Hospitality Policy;
- offer or accept a gift to or from government officials or representatives, or politicians or political parties;
- knowingly engage in the facilitation of tax evasion by a third party or otherwise aid, abet, counsel or procure the commission of a tax evasion offence by another person;
- accept a payment, gift or hospitality from a third party that you know or suspect is offered with the expectation that you will in return not report tax evasion;
- fail to promptly report any request or demand from a third party to facilitate the fraudulent evasion of tax, in accordance with this policy;
- threaten or retaliate against another individual who has refused to commit or facilitate a bribery or tax evasion offence or who has raised concerns under this policy; or
- engage in any other activity that might lead to a breach of this policy.

Facilitation payments and kickbacks

We do not make, and will not accept, facilitation payments or "kickbacks" of any kind.

Facilitation payments, also known as "back-handers" or "grease payments", are typically small, unofficial payments made to secure or expedite a routine or necessary action (for example by a government official).

Kickbacks are typically payments made in return for a business favour or advantage.

You must avoid any activity that might lead to a facilitation payment or kickback being made or accepted by us or on our behalf, or that might suggest that such a payment will be made or accepted. If you are asked to make a payment on our behalf, you should always be mindful of what the payment is for and whether the amount requested is proportionate to the goods or services provided. You should always



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ask for a receipt which details the reason for the payment. If you have any suspicions, concerns or queries regarding a payment, you should raise these with your line manager, a member of the Human Resources Department or under Safestore's Whistleblowing (Speak Out) policy.

Donations

Safestore do not make contributions to political parties.

Safestore only make charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of a Director.

Record-keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties.

You must declare and keep a written record of all hospitality or gifts given or received, according to Safestore's Gifts, Tips and Hospitality Policy.

You must submit all expenses claims relating to hospitality, gifts or payments to third parties in accordance with our Expenses policy and record the reason for expenditure.

All accounts, invoices, and other records relating to dealings with third parties including suppliers and customers should be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

Your responsibilities

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of bribery, tax evasion and other forms of corruption are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify your line manager as soon as possible if you believe or suspect that a conflict with this policy has occurred, or may occur in the future. For example, if a customer or potential customer offers you something to gain a business advantage with us, or indicates to you that a gift or payment is required to secure their business. Further "red flags" that may indicate bribery, tax evasion or corruption are set out at the end of this policy.

How to raise a concern

You are encouraged to raise concerns about any issue or suspicion of bribery, tax evasion or corruption at the earliest possible stage. Safestore ensures that all disclosures are handled confidentially and in accordance with local legal requirements.

If you are offered a bribe, or are asked to make one, or if you believe or suspect that any bribery, tax evasion offence, corruption or other breach of this policy has occurred or may occur, you must notify



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your line manager or report it in accordance with our Whistleblowing (Speak Out) Policy as soon as possible.

If you are unsure about whether a particular act constitutes bribery, tax evasion or corruption, raise it with your line manager or contact a member of the Human Resources Department

Protection

Individuals who refuse to accept or offer a bribe, or who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.

We are committed to ensuring no one suffers any detrimental treatment as a result of refusing to take part in bribery, tax evasion or corruption, or because of reporting in good faith their suspicion that an actual or potential bribery, tax evasion or other corruption offence has taken place, or may take place in the future. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, you should raise it formally using our Conflict Resolution Procedure.

Training and communication

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

Potential risk scenarios: "red flags"

The following is a list of possible red flags that may arise during the course of you working for us and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags while working for us, you must report them promptly to your line manager or using the procedure set out in the Whistleblowing (Speak Out) policy:

- you become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- you learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;



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- you become aware, in the course of your work, that a third party has made or intends to make a false statement relating to tax, has failed to disclose income or gains to, or to register with, HMRC (or the equivalent authority in any relevant non-UK jurisdiction);
- a third party insists on receiving a commission or fee payment before committing to sign up to a contract with us, or carrying out a government function or process for us;
- a third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- a third party requests that payment is made to a country or geographic location different from where the third party resides or conducts business;
- a third party requests an unexpected additional fee or commission to "facilitate" a service;
- a third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- a third party requests that a payment is made to "overlook" potential legal violations;
- a third party requests that you provide employment or some other advantage to a friend or relative;
- a third party offers you a payment or other incentive to "keep quiet" about their intention to evade tax;
- a third party to whom we have provided services requests that their invoice is addressed to a different entity, where we did not provide services to such entity directly, or to change the description of services rendered on an invoice in a way that seems designed to obscure the nature of the services provided;
- you are asked to assist another person in their fraudulent evasion of tax (whether directly or indirectly);
- you receive an invoice from a third party that appears to be non-standard or customised;
- a third party insists on the use of side letters or refuses to put terms agreed in writing;
- you notice that we have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- a third party requests or requires the use of an agent, intermediary, consultant, distributor or supplier that is not typically used by or known to us;
- you are offered an unusually generous gift or offered lavish hospitality by a third party;

Our zero-tolerance approach to bribery, tax evasion and corruption must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter.

Breaches of this policy

Any employee or officer who is found to have breached this policy will face disciplinary action, which could result in termination of employment.



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We reserve the right to terminate our relationship with any individual, firm, company or organisation working with or on our behalf if they are found to have breached this policy.

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