



# Vendor Code of Conduct

Extra Space Storage 2021

---

Extra Space Management Inc., and its subsidiaries (collectively, “ESMI”) are committed to conducting business with the highest level of integrity. As an industry leader, we have decided to set an example by including these same high standards into our supply chain to ensure that we only do business with Vendors that have the same high standards. For ESMI to continue to lead and grow in a sustainable, responsible fashion, all Vendors of services and/or products are required to embrace our standards by accepting this Vendor Code of Conduct (“Code”).

This Code outlines the requirements ESMI has for its Vendors regarding fundamental ethics and business conduct. We require that each Vendor understand the requirements of this Code. All references in this Code to “Laws” means all applicable laws, directives, rules, regulations, decrees, and governmental orders.

## ETHICS AND BUSINESS CONDUCT

**1. Anti-Corruption and Anti-Bribery.** Vendor is expected to compete solely on the merits of their services and products. Vendor should not offer or promise anything of value (including, without limitation, business gifts or courtesies) with the intent of inducing anyone to forego their duties and provide unfair business advantage. Vendor will not engage in any form of corrupt practices including, without limitation, fraud, extortion, impersonation, false declarations, bribery, money laundering, supporting or involvement with terrorist or organized crime activities. Vendor will encourage its employees, representatives, and subcontractors to, comply with all Laws relating to anti-corruption, anti-money laundering, and the prevention of fraud and other financial crime.

**2. Antitrust.** Vendor should refrain from engaging in any illegal, anti-competitive conduct or deceptive trade practice for any reason whatsoever, whether on behalf of ESMI, Vendor, or others. Vendor must avoid unethical practices such as improper exchange of competitive information, bid rigging, price fixing, or exchange of customers’, ESMI’s, Vendor’s, or others’ competitively sensitive information (including, without limitation, price, cost, and technical data) with ESMI’s competitors or competitors of Vendor. Vendor should also refrain from abusing their market power, whether for their benefit or for the benefit of others, by refusing to deal fairly, engaging in predatory or discriminatory pricing practices, conditioning the sale or provision of a product or service with that of another product or service, or undertaking similar abusive tactics. Vendor should not engage in other deceptive or unfair market practices, whether on behalf of ESMI, Vendor, or others. Further, Vendor should never make any misrepresentations relating to the products or services of ESMI, Vendor or others.

**3. Licensing/Permits.** Vendors must obtain all required permits and licenses to conduct business according to the local Laws.

**4. Conflict of Interest.** Vendors must avoid offering gifts, benefits, or favors that are intended (or could appear) to influence ESMI's employees to act in their personal interest rather than ESMI's best interest. Vendors must avoid unfair dealing.

## LABOR AND HUMAN RIGHTS

We expect our Vendors to treat all people with dignity and respect, encourage equal opportunity for all and help create a diverse and inclusive culture. We expect our Vendors to enforce similar practices and policies that apply to all workers, Vendors, and their supply chains, including temporary and migrant workers.

**1. Child Labor.** Vendor will not engage in or promote the unlawful employment or exploitation of children in the workplace. Vendor will be committed to combating the exploitation of children, and therefore prohibit any use of child labor with any Vendor or other third-party arrangements. Vendor is expected to cooperate with law enforcement authorities to address any such instances of which Vendor becomes aware.

**2. Human Trafficking, Slavery, and the Right to Voluntary Labor.** Vendor will respect the free choice of all persons and strictly prohibit forced or compulsory labor for any employees. Vendor will refrain from doing business with, tolerate, or associate with organizations or entities that condone or are engaged in the practice of coercing or imposing work with little or no freedom of choice.

**3. Inclusion and Non-Discrimination.** ESMI always expects all workers to be treated with respect and dignity. Vendor will proactively invest in, equality, diversity, and inclusion. Vendor will ensure that its workplace is free of harassment and discrimination based on a person's status such as race, color, religion, national origin, gender, sexual orientation, gender identity, age, disability, veteran or military status or other characteristics protected by Law. Vendor will ensure that it has requisite policies and practices in place to promote such equality, diversity, and inclusion, and foster a harassment and retaliation free environment.

**4. Safe and Secure Workplace.** Vendor will provide a safe and secure workplace for all employees, and prevent accidents to employees, customers, and visitors. Vendor's leadership will ensure compliance with this commitment in every location and facility in which Vendor operates.

**5. Working Hours and Wages.** Vendor will comply with all Laws dealing with the wages Vendor pays its employees and the hours they work. Vendor will be committed to be an ethical employer that strives to improve labor standards, respects its employees' contributions, and rewards them fairly.

**6. Freedom of Association.** Vendor will respect the rights of employees and comply with all Laws concerning freedom of association and collective bargaining.

## HEALTH AND SAFETY

Vendor shall incorporate health and safety management practices into all areas of their business to protect employees and visitors. Vendor is encouraged to fully comply with all applicable safety, security, and health Laws of the jurisdictions where it conducts business.

## ENVIRONMENTAL SUSTAINABILITY

Vendor recognizes that adverse effects on the community, environment and natural resources should be minimized to safeguard the health and safety of the public. To achieve this objective, Vendor should observe and comply with all applicable environmental Laws, including, without limitation, those which relate to (i) obtaining and maintaining required environmental permits, approvals and registrations, as well as complying with applicable operational and reporting requirements; (ii) the handling, removal, transportation and disposal of hazardous materials used by Vendor; and (iii) monitoring, controlling, treating and sanitizing air emissions, waste water and solid wastes. Vendor will seek opportunities that promote the efficient use of resources and energy, as well as clean and low energy solutions. ESMI encourages Vendors to institute effective management systems such as ISO 14001 that utilize the best techniques and practices to continuously improve.

## FINANCIAL INTEGRITY

Vendor must accurately record, maintain, and report business records, including financials, quality reports, time records, expense reports and any required submissions to regulatory authorities.

## TRANSPARENCY AND COMPLIANCE VERIFICATION

ESMI expects that all current and future Vendors adhere to this Code and join ESMI in their commitment to become more socially and environmentally responsible. The Vendor must self-monitor and should be able to prove compliance with this Code upon ESMI's request. The contents of this Code are additional to and do not in any way affect or prejudice any of ESMI's rights and remedies under the relevant contracts with each Vendor, if any.

Any facts or circumstances that lead to your inability to meet the requirements and expectations of this Code should be immediately reported to your designated contact on the ESMI procurement team.

Encounters that you believe to be a violation of this Code, local laws, regulations, or unethical behavior should be reported to our whistleblower hotline. Retaliation of any kind against an individual who reports in good faith violates ESMI's principles and will not be tolerated.

The reporting hotline (available 24 hours a day, 7 days a week) is:

- 1-800-637-9894

Reports can also be made via email at: [whistleblower@extraspace.com](mailto:whistleblower@extraspace.com)

## SIGNATURE

By signing this Code, the Vendor agrees to take appropriate measures to implement and comply with the principles listed above.

Company: \_\_\_\_\_

Signature and Date: \_\_\_\_\_

Job Title: \_\_\_\_\_