



Supplier Code of Conduct

Extra Space Storage 2020

Extra Space Storage Inc., and its subsidiaries (collectively, “EXR”) 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 Suppliers that have the same high standards. For EXR to continue to lead and grow in a sustainable, responsible fashion, all Suppliers of services and/or products are required to embrace our standards by accepting this Supplier Code of Conduct (“Code”).

This Code outlines the requirements EXR has for its Suppliers regarding fundamental ethics and business conduct. We require that each Supplier 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. Supplier is expected to compete solely on the merits of their services and products. Supplier 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. Supplier 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. Suppliers shall not offer bribes or kickbacks to any EXR representative or third party with the intention of gaining or retaining a business advantage. Supplier 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. Supplier should refrain from engaging in any illegal, anti-competitive conduct or deceptive trade practice for any reason whatsoever, whether on behalf of EXR, Supplier, or others. Unethical practices such as improper exchange of competitive information, bid rigging, price fixing, or

exchange of customers', EXR's, Supplier's, or others' competitively sensitive information (including, without limitation, price, cost, and technical data) with EXR's competitors or competitors of Supplier. Supplier 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. Supplier should not engage in other deceptive or unfair market practices, whether on behalf of EXR, Supplier, or others. Further, Supplier should never make any misrepresentations relating to the products or services of EXR, Supplier or others. Similarly, Supplier should never denigrate EXR's competitors or Supplier's competitors, or their products or services

- 3. Licensing/Permits.** Suppliers must obtain all required permits and licenses to conduct business according to the local Laws.
- 4. Conflict of Interest.** Suppliers must avoid offering gifts, benefits, or favors that are intended (or could appear) to influence EXR's employees to act in their personal interest rather than EXR's best interest. Suppliers must avoid unfair dealing.

LABOR AND HUMAN RIGHTS

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

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

2. Human Trafficking, Slavery, and the Right to Voluntary Labor. Supplier will respect the free choice of all persons and strictly prohibit forced or compulsory labor for any employees. Supplier 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. Supplier will comply with the UN Guiding Principles on Business and Human Rights and will cooperate with law enforcement to address such instances that come to the attention of Supplier.

3. Inclusion and Non-Discrimination. EXR always expects all workers to be treated with respect and dignity. Supplier will proactively invest in, equality, diversity, and inclusion. Supplier 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. Supplier 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. Supplier will provide a safe and secure workplace for all employees, and prevent accidents to employees, customers, and visitors. Supplier's leadership will ensure compliance with this commitment in every location and facility in which Supplier operates.

5. Working Hours and Wages. Supplier will comply with all Laws dealing with the wages Supplier pays its employees and the hours they work. Supplier 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. Supplier will respect the rights of employees and comply with all Laws concerning freedom of association and collective bargaining.

HEALTH AND SAFETY

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

ENVIRONMENTAL SUSTAINABILITY

Supplier 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, Supplier 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 Supplier; and (iii) monitoring, controlling, treating and sanitizing air emissions, waste water and solid wastes. Supplier will seek opportunities that promote the efficient use of resources and energy, as well as clean and low energy solutions.

FINANCIAL INTEGRITY

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

TRANSPARENCY AND COMPLIANCE VERIFICATION

EXR expects that all current and future Suppliers adhere to this Code and join EXR in their commitment to become more socially and environmentally responsible. The Supplier must self-monitor and should be able to prove compliance with this Code upon EXR's request as. If requested Suppliers are expected to provide EXR or its representatives with details and data regarding their performance on topics outlined in this Code. If a Supplier is noncompliant, EXR reserves the right to take appropriate actions, including termination of any contract.

For questions or concerns related to this Code and its specific application to the services or products being provided for EXR, or to report any suspected violations of this Code, please contact your EXR supply chain point of contact.