



Non-discrimination/Anti-Harassment Policy

A. Objective

Shurgard is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits unlawful discriminatory practices, including harassment. Therefore, Shurgard expects that all relationships among persons in the company will be business-like and free of bias, prejudice and harassment.

Shurgard has developed this policy to ensure that all its employees, consultants, and other third parties can work in an environment free from unlawful harassment, discrimination and retaliation. Shurgard will make every reasonable effort to ensure that all concerned are familiar with these policies and are aware that any complaint in violation of such policies will be investigated and resolved appropriately.

Any employee who has questions or concerns about this policy should talk with their Human Resources Manager or their line manager.

This policy should not, and may not, be used as a basis for excluding or separating individuals of a particular gender, or any other protected characteristic, from participating in business or work-related social activities or discussions. In other words, no one should make the mistake of engaging in discrimination or exclusion to avoid allegations of harassment. The law and the policies of Shurgard prohibit disparate treatment on the basis of sex or any other protected characteristic, with regard to terms, conditions, privileges and perquisites of employment. The prohibitions against harassment, discrimination and retaliation are intended to complement and further those policies, not to form the basis of an exception to them.

B. Equal Opportunity Employment

Shurgard is an equal opportunity employer. We are committed to ensuring that our workplace is free from unlawful or unfair discrimination, within the framework of applicable laws.

We aim to ensure that our employees achieve their full potential and that all employment decisions are taken without reference to irrelevant or discriminatory criteria. We have adopted this policy as a means of helping to achieve these aims.

The protected characteristics are age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity.

Shurgard also respects the right of all employees to form and join a trade union of their choice without fear of intimidation or reprisal, in accordance with national law.

Hence, membership in a trade union and employee's activity regarding trade union organization are also protected characteristics.

What is discrimination or victimization?

Discrimination

Direct discrimination occurs when someone is treated less favourably than another person because of a protected characteristic.

Associative discrimination or discrimination by association occurs where there is discrimination against someone because of their association with another person who possess a protected characteristic.

Discrimination by perception is where a person is discriminated against because it is thought that they possess a particular characteristic even if they do not actually possess it.

Indirect discrimination occurs where an individual's employment is subject to an unjustified provision, criterion or practice which one sex, race, nationality, or age group for example, finds more difficult to meet although on the face of it, the provision, criterion or practice is neutral.

Victimization

Victimization occurs where an employee is treated less favorably because they have made or supported a complaint or raised a grievance or are suspected of doing so.

Shurgard's commitment

Interviews will be conducted on an objective basis.

All employees have a right to equality of opportunity and a duty to implement this policy. Discrimination is a serious disciplinary matter which will normally be treated as gross misconduct.

C. Harassment

Harassment pollutes the working environment and can have a devastating effect on the health, confidence, morale and performance of those affected by it. It may also have a damaging effect on other employees not themselves the object of unwanted behavior who are witness to it or who have knowledge of the behavior. All employees are entitled to a working environment which respects to their personal dignity and which is free from such objectionable conduct. Harassment is a disciplinary offence and it will normally be treated as

gross misconduct.

What is harassment?

Harassment is either:

- Unwanted conduct (whether verbal or not) related to a relevant protected characteristic which affects the dignity of men or women at work;
- Bullying of colleagues by intimidatory behavior;
- Unfavorable conduct at work, whether verbal or non-verbal, towards someone based on a protected characteristic which could affect his/her dignity at work.

A single incident can amount to harassment if sufficiently grave.

Examples of harassment include:

- ° Insensitive jokes and pranks.
- ° Lewd comments about appearance.
- ° Unnecessary body contact.
- ° Displays of sexually offensive material, e.g. Pin-ups.
- ° Repeated instances of minor harassment acts.
- ° Requests for sexual favours.
- ° Speculation about a person's private life and or sexual activities.
- ° Threatened or actual violence.
- ° Threat of dismissal, loss of promotion, etc. for refusal of sexual favours.
- ° Bullying. Bullying is defined as any form of physical or verbal attack and/or threat of such, or the abuse of position, in order to attack or undermine the confidence or ability of another, or to place another employee under unreasonable pressure or subjecting another to detrimental treatment, by either act or omission.
- ° Jokes about a person being either too old or too young to do a job properly.
- ° Age related jokes.

Anyone who believes that he or she may have been the victim of harassment should raise the matter through their line manager who will come back to you within 5 working days.

If you are not satisfied with the outcome or if you wish to make a formal grievance then you should raise the matter in writing either to your HR Manager or Line Manager.

