

ESC – Whistleblowing policy



1 Purpose and scope

1.1 Purpose

This policy is designed to allow all Concerned Persons (as defined hereunder) to disclose information internally in a responsible and effective manner on actual or potential acts, which occurred or are very likely to occur, and that they believe shows malpractice, unethical conduct or illegal practices in the workplace, without being penalized in any way.

This policy also sets out how Shurgard will support the Concerned Persons to (i) safely express concerns, (ii) know who to contact, (iii) inform how to make a report, and (iv) set forth the applicable protections.

1.2 Scope

This whistleblowing policy is applicable to all employees, shareholders, executive or non-executive directors, (sub)contractors, agency staff, consultants, trainees, suppliers and partners of Shurgard as it relates to work with any one of Shurgard's entities (a **Concerned Person**).

Concerned Persons are expected to disclose or report the following acts/incidents:

- a crime or offense (for example, corruption, moral or sexual harassment, discrimination);
- a breach of a legal requirement (for example, health or safety obligations owed by Shurgard);
- gross misconduct;
- serious breach of Shurgard's code of conduct;
- a threat or serious prejudice to the public interest;
- a breach of any obligation defined by national or international regulation;

that could occur in various contexts such as:

- financial markets, prevention of money laundering and terrorist financing, anti-bribery, or other financially related regulation;
- product safety and compliance;
- protection of the environment;
- health and safety at work;
- consumer protection;
- protection of privacy and personal data, and security of network and information systems;
- corporate tax law.

This list is not intended to be exhaustive and used as an illustration only.

This policy is not designed to question financial or business decisions taken by Shurgard.

The purpose of this policy is also to ensure that Shurgard carries out its responsibilities in respect of the law and of its employees, and to ensure that employees act within the law.

Shurgard expects all Concerned Persons to adhere to all rules, policies and procedures.

2 Reporting procedure

2.1 Preliminary remark

This policy aims to encourage Concerned Persons to raise any wrongdoing at an early stage and in an appropriate way.

We strongly encourage any Concerned Person to seek advice before reporting a concern to anyone external.

2.2 How to report?

As a Shurgard employee, you should initially consider consulting your line manager or your Human Resources manager when you have a concern that falls under this policy.

If you feel uncomfortable doing so or if you are not an employee, you may seek assistance from this whistleblowing policy by using our Whistleblowing secured platform: <https://shurgard.integrity.complylog.com/>

2.3 Who's in charge?

The reporting person shall be aware that the reporting procedure is a Shurgard internal procedure. Reported cases are handled by the Internal Audit department and in case of conflict of interest by the Legal Department, treating any whistleblowing disclosure with the highest level of confidentiality. As a last resort, the company can use external channel of reporting to ensure the impartiality of the procedure.

2.4 The investigation

While Shurgard does not require the reporting person to provide evidence before reporting the matter, the reporting person must always act in good faith and is encouraged to provide accurate and impartial information about the facts including supporting documentation, if any, of the facts reported, in order that a full and complete investigation can be conducted. The lack of evidence could hinder a full and complete investigation.

Following any disclosure, a written acknowledgement of receipt will be issued within seven (7) calendar days and the Internal Audit department (or, as stated hereunder 2.3, the Legal Department in case of conflict of interest) will conduct a review of the facts reported. An impartial, documented, fair and confidential review will be conducted, and if required this will include interviews with witnesses and other parties involved. All meetings and communication will be documented. Any documents will be designed, established and operated in a secure manner that ensures that the confidentiality of the identity of the reporting person and any third party mentioned in any report will be protected, and will prevent access thereto by non-authorized people. A diligent follow-up will be provided to the reporting person in a reasonable timeframe, without exceeding three (3) months from the expiry of the seven-day period after the report was made.

2.5 Confidentiality

The identity of the reporting person will be protected at all stages in any internal matter to the extent reasonably possible and subject to national legislation. While Shurgard will do its utmost to maintain confidentiality, it cannot guarantee this can be done in all circumstances such as if external legal action results from the disclosure. To the extent possible and legally permitted, the reporting person will be informed of such disclosure. Shurgard is not accountable for maintaining anonymity where the reporting person has told others of the alleged wrongdoing or where a thorough investigation of the allegations is required.

The reporting person who makes a public disclosure shall qualify for protection if the reporting person has first used the internal reporting channels and no appropriate action was taken in response to the report within the provided timeframe (or under other circumstances provided by national or international law).

3 **Protection for disclosure**

The reporting person (and third persons who are connected with the reporting person and who could suffer retaliation in a work-related context, such as colleagues or relatives of the reporting person) may not be in any way dismissed, sanctioned or discriminated against for reporting facts in good faith in compliance with this policy. Only the abusive use (in bad faith) of this policy may be sanctioned according to Shurgard's disciplinary procedure.

Hence, there will be no adverse consequences for anyone who reports an act under this policy in good faith. Concerned Persons will be protected from retaliation (as it relates to employees, trainees and consultants regarding promotion, bonus, career advancement and as it relates to (sub)contractors and suppliers, blacklisting or early termination or cancellation of a contract), harassment, victimization or disciplinary action as a result of any disclosure. However, allegations made in bad faith, such as to harm another's reputation, will be sanctioned.

If an inquiry determines that it is reasonably certain that illegal activities have occurred, the department in charge of the investigation will issue a report to the designated level of management, to the Legal department, and if appropriate, to the Audit Committee. If necessary, Shurgard will make all evidence collected during the investigation to legal and law enforcement agencies and will pursue the prosecution of all parties involved in criminal activities. Appropriate actions will be taken to recover assets lost as a result of fraud or dishonest activities. In all cases where the evidence is sufficient to warrant disciplinary action, such action will be taken in compliance with all applicable laws.

4 Data Protection

Under this policy, Shurgard is considered as the data controller. This allows it to collect the information, facts and to assess their admissibility and to inform the persons concerned on the follow-up actions. This policy applies without prejudice to and in accordance with the Employee Privacy Policy. We recommend that you read the Privacy Policy, which describes in detail how, why and for what purposes Shurgard processes your personal data in the workplace, the regulatory framework and your rights under data protection laws. This policy may be supplemented by additional documents describing in further detail our data processing operations and providing further information as required under applicable laws in the relevant country.

When Shurgard processes employees' personal data for the purposes of this policy, Shurgard will comply with all applicable data protection laws and the Employee Privacy Policy, when applicable. Shurgard refers to clause 5 of the Shurgard Employee Privacy Policy about information regarding an employee's rights.

Furthermore, as a data controller, Shurgard will not indefinitely retain the processed personal data and will:

- a) immediately delete the data when the information is considered to not fall within the scope of this policy;
- b) destroy the data within two (2) years of the closing of any procedure, unless it should be kept for a longer period for legal and regulatory purposes as provided under Section 2 of the Privacy Policy.

If the reporting person(s) has any question regarding the exercise of their rights or regarding the processing of their personal data, they can address an e-mail to Shurgard at dataprotection@shurgard.eu.