## **Reporting Violations**

All employees have a responsibility to guard against and report work place concerns or violations such as but not limited to:

Legal or regulatory violation	Fraud	Threats of Harassment
Questionable accounting matter	Theft	Ethics violation
Questionable audit matter	Corruption	Conflicts of interest
Code of conduct violation	Discrimination	Bribery / Kickbacks
Retaliation for speaking up	Expense Violation	

The Company has adopted this Whistleblowing and Whistleblower Protection Policy (this "Policy") to deal with such matters, Extra Space Management has adopted the following procedures set forth in this Policy for the anonymous and confidential submission by employees of complaints or concerns and (2) the receipt, retention and treatment of employee complaints or concerns regarding such matters.

## **Violations by Others – Channels of Communication**

If an employee knows of, observes, suspects or becomes aware of a work place concern or violation, that employee must report that information immediately to his or her direct supervisor or HR representative. Concealing improper conduct often compounds the problem and may delay or hamper responses that could prevent or mitigate actual damage.

The purpose of the Hotline is to provide an avenue for employees to report a concern when the normal channels of communication (i.e., through your supervisor and /or HR) have proven ineffective, or the employee believes that his/her supervisor is in any way involved or implicated in the action for which the complaint is being made. If it is believed that Internal Audit is involved with any wrongdoing, you may reach out to the Chief Legal Officer.

All submissions are taken seriously, investigated promptly and kept confidential to the extent possible. To maintain confidentiality, submission details are only shared with those responsible for the investigation and feedback is not provided to the whistleblower.

Regardless of how a concern is reported, it is strictly prohibited to retaliate against anyone who, in good faith, reports a possible violation or who participates in an investigation even if sufficient evidence is not found to validate the concern.

When submitting a concern, your contact information is welcomed for prompt follow-up and clarification. However, your information is not required and it's your decision to remain anonymous or not.

## The hotline is available 24 hours a day, 7 days a week and available in the following formats:

• Electronic Form (click "Electronic Form" to be taken to the form)

This questionnaire is designed to gather enough detail about the alleged incident to allow for timely, adequate investigation and follow-up. It is completely confidential unless you choose to provide your contact information. When filling out the survey, please be as detailed as possible as there is no way to contact you with follow up questions or to request clarification due to the anonymous nature of this form.

• Telephone (1-800-637-9894)

Your call is routed to an Extra Space voice mailbox monitored by Internal Audit. Once the call is connected, you will hear an introductory message, and then you are free to explain your concern in your message. In your voicemail, please be as detailed as possible about what, where, when, why, who,

etc. The process is designed to be confidential but cannot be guaranteed due to the internal administration of company phones.

• Email (whistleblower@extraspace.com)

Your email is routed to an Extra Space inbox monitored by Internal Audit. In your email, please be as detailed as possible about what, where, when, who, etc. Unlike the online submission process, email cannot guarantee confidentiality due to the internal administration of company email.

## **Violations by Oneself**

If an employee believes that he or she may have violated the law or business ethics standards, or engaged in questionable accounting or auditing practices, he or she must report this behavior to his or her direct supervisor or another appropriate representative of senior management immediately. The fact that the employee reported the violation, together with the degree of cooperation he or she displays, and whether the violation is intentional or unintentional, will be given consideration in an investigation and any resulting disciplinary action.