



# **National Storage REIT**

## **Anti-Bribery and Corruption Policy**

**National Storage Holdings Limited**

Adopted 23 June 2021

Reviewed 21 June 2023

# Anti-Bribery and Corruption Policy

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# Anti-Bribery and Corruption Policy

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## 1 Definitions

**Bribery** means the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action which is illegal, unethical or a breach of trust. A bribe is an inducement or reward offered, promised, or provided to gain any commercial, contractual, regulatory, or personal advantage and can take the form of gifts, loans, fees, rewards, or other advantages.

**Corporations Act** means the Corporations Act 2001 (Cth).

**Corruption** means the abuse of entrusted power for private gain.

**National Storage Group** means the stapled group comprising NSHL and its Subsidiaries, NSFSL as responsible entity of the Trust and the Trust and the entities which the Trust controls.

**NSFSL** means National Storage Financial Services Limited ACN 600 787 246 AFSL 475 228.

**NSHL** means National Storage Holdings Limited (ACN 166 572 845).

**Subsidiaries** has the meaning given in the Corporations Act.

**Third party** means any individual or organisation you encounter during your work, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians, and political parties.

**Trust** means National Storage Property Trust.

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## 2 Purpose and application

### 2.1 Introduction

National Storage Group operates within the framework of stringent anti-bribery and corruption laws, which are enforced in various countries, including Australia, the United States, and the United Kingdom. It is important to note that these laws possess wide-ranging extraterritorial reach, applying to actions conducted in foreign jurisdictions as well. Consequently, National Storage Group is obligated to comply with and uphold all laws governing bribery, corruption, and related conduct in every jurisdiction where we operate.

Engaging in bribery and corruption is considered a criminal offence, with potential repercussions for individuals including imprisonment and fines. As an organisation, our involvement in corrupt practices could result in severe consequences, such as substantial fines, exclusion from public contract tenders, and significant damage to our reputation. Therefore, National Storage Group places immense importance on fulfilling our legal obligations and maintaining a steadfast commitment to preventing bribery and corruption.

### 2.2 Purpose and scope

The objective of this policy is to implement robust controls that guarantee adherence to all relevant regulations pertaining to anti-bribery and corruption. Furthermore, it

aims to ensure that the operations of the National Storage Group are conducted with a strong commitment to social responsibility.

This Policy applies to anyone who is employed or works for the National Storage Group, including employees, contractors, consultants, and directors wherever located (collectively referred to as employees in this Policy).

This Policy further encapsulates foreign and domestic cases of bribery and corruption.

## **2.3 Policy statement**

National Storage Group affirms its unwavering stance against bribery and corruption. Our organisation is firmly dedicated to upholding professionalism, fairness, and integrity in all our business dealings and relationships, regardless of the geographical locations in which we operate. We are resolute in our pursuit of implementing and enforcing robust systems that effectively counteract bribery.

National Storage Group is committed to complying with all applicable laws concerning the prevention of bribery and corruption across the jurisdictions in which we operate. However, it is important to emphasise that we are bound by the laws of Australia, governing our conduct domestically and internationally.

To demonstrate our commitment, we have adopted comprehensive systems designed to mitigate the risks associated with bribery and related improper conduct. These systems will be regularly monitored and rigorously enforced to ensure their effectiveness. Periodically, we may provide additional guidance to our employees concerning acceptable practices in routine operations, actions requiring approval from senior management or the Board, and activities that are strictly prohibited.

National Storage Group firmly believes that by adhering to these principles, we can maintain the highest standards of ethical conduct and foster an environment of trust and transparency within our organisation and beyond.

## **2.4 Policy requirements**

### **(a) Bribes and Facilitation Payments**

National Storage Group has a strict policy not to offer secret commissions or bribes to further its business interests. Depending on the circumstances, facilitation payments may breach anti-bribery laws. Facilitation payments, defined as monetary or non-monetary inducements offered to expedite routine actions performed by public officials, are considered a form of bribery.

Employees are prohibited from engaging in any kind of bribe, facilitation payment or corrupt behaviour, regardless of whether a benefit is given to or received by another person and irrespective of the value of the benefit.

### **(b) Gifts and Hospitality**

Prior to giving or accepting any gift and/or benefit, regardless of its value, employees must assess whether such actions may:

1. Compromise their integrity and objectivity in performing their duties or create an appearance thereof.
2. Cause a conflict of interest or create an appearance thereof.

If either of the above situations occurs, employees should:

3. Refrain from giving or accepting the gift and/or benefit.
4. If uncertain, discuss the matter with their manager to determine the appropriate course of action.

In cases where employees are confident that neither scenario 1 nor 2 will arise, or have obtained their manager's approval, the following guidelines apply:

- Employees are required to disclose all gifts and benefits valued at \$250 or more by registering them in the Gift and Entertainment Register.
- Employees are expected to politely decline or avoid accepting gifts and benefits valued at \$400 or more, except in the following circumstances:
  - Work-related conferences;
  - Invitations to speak at professional associations, including flights and accommodations;
  - Working lunches; and
  - Cases where it forms part of a sponsorship or partnership agreement with National Storage Group.

Approval for any gifts and entertainment above \$400 may only be provided by the collective Executive Management Team and must be disclosed in the register.

#### **(c) Political Contributions**

Employees are prohibited from making political donations on behalf of the National Storage Group.

#### **(d) Dishonesty**

Employees are required to comply with the National Storage Group's Code of Conduct and are expressly prohibited from carrying out any dishonest accounting or concealment of complete and accurate financial activity.

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### **3 Breach of this policy**

The highest standards of corporate conduct are critical to the National Storage Group's success. This Policy is designed to focus you on your obligations and values identified by the National Storage Group as central to its integrity.

Compliance with this policy will be monitored, and any known or suspected breaches of this Policy will be investigated.

If you are aware or reasonably suspect a breach of this Policy to have occurred, you must report it as a matter of urgency to your manager or the Head of Legal and Governance.

If you are not comfortable, for any reason, with speaking directly to your manager or the Head of Legal and Governance, you can report the breach via our Whistleblower portal: [www.nationalstorageinvest.com.au/governance/whistleblower](http://www.nationalstorageinvest.com.au/governance/whistleblower).

If a breach is found to have occurred, the employee responsible may face legal or disciplinary action including termination of employment.

Material breaches of this Policy will be reported to the Board of NSHL.

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## **4 Administration**

### **4.1 Where can I obtain further information?**

The National Storage Group has a dedicated person responsible for the administration of this Policy. At the date of adoption of this Policy, this is the Head of Legal and Governance.

If you require further information or assistance or are uncertain about the application of this Policy or the law, please contact the Legal and Governance team.

### **4.2 Review and publication of this policy**

The Board will review this Policy from time to time. This Policy may be amended by resolution of the Board.

A copy of this Policy will be available on the National Storage Group's website. It will be distributed to all directors, officers, employees, and other persons as relevant. Key features will be published in the annual report.

**Reviewed by NSHL Board on 21 June 2023**