



# **National Storage REIT**

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

**National Storage Holdings Limited**

Adopted 23 June 2021

Reviewed 22 June 2022

# Anti-Bribery and Corruption Policy

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# Anti-Bribery and Corruption Policy

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## 1 Definitions

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

**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.

**Trust** means National Storage Property Trust.

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## 2 Purpose and application

### 2.1 Purpose of this policy

A number of countries, including Australia, have strict laws against bribery and corruption. The anti-bribery laws of some countries including Australia, the United States and United Kingdom can apply to things done in other countries (i.e. wide-reaching extra-territorial effect). We must comply with and uphold all laws against bribery, corruption and related conduct applying to the National Storage Group in all the jurisdictions where the National Storage Group operates.

The purpose of this policy is to establish controls to ensure compliance with all applicable anti-bribery and corruption regulations, and to ensure that the National Storage Group's business is conducted in a socially responsible manner.

### 2.2 Policy statement

Bribery is the offer, payment, or provision of a benefit to someone to influence the performance of a person's duty and/or to encourage misuse of his or her authority.

We have a zero-appetite towards bribery and corruption. We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery. This Policy encapsulates foreign and domestic cases of bribery and corruption.

As identified in the Code of Conduct, National Storage Group and its directors, officers, employees, and those that act for or on behalf of the National Storage Group will conduct all business in an honest and ethical manner.

If you have any questions about your obligations or about the National Storage Group's expectations, please speak with your manager or the Head of Legal and Governance.

## 2.3 Policy requirements

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.

Directors, officers, employees, and other persons that act for or on behalf of the National Storage Group are prohibited from:

- engaging in any kind of bribe or corrupt behaviour, regardless of whether or not a benefit is given to or received by another person and regardless of the value of the benefit;
- carrying out any dishonest accounting or concealment of complete and accurate financial activity; and
- making political donations on behalf of the Group.

Bribery and corruption are punishable for individuals by imprisonment and/or a fine. If we are found to have taken part in corruption, we could face an unlimited fine, be excluded from tendering for public contracts and face damage to our reputation. We therefore take our legal responsibilities very seriously.

Naturally, you must not accept any money or opportunity or other benefit which could be interpreted as an inducement, secret commission, or bribe. Care must be exercised in accepting hospitality, entertainment, or gifts over and above that required for the normal conduct of business or which may compromise your impartiality.

National Storage Group will comply with all laws relevant to countering bribery and corruption in all the jurisdictions in which we operate. However, we remain bound by the laws in Australia in respect of our conduct both at home and abroad.

We are committed to adopting effective systems to counter bribery and related improper conduct and to monitoring and enforcing these systems. From time to time, we may issue further guidance regarding what is acceptable in the normal course, what you can do with senior manager or Board approval and what is prohibited.

For further information or clarification, seek advice from your manager or the Head of Legal & Governance or another relevant advisor.

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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, the Head of Legal & Governance or 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, you 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 & Governance.

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

### **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 22 June 2022**