

Life Storage

Vendor Code of Conduct

General

Life Storage, Inc. (together with its controlled subsidiaries, “Life” or the “Company”) is committed to fair and ethical business conduct, consistent with our Code of Ethics. The Company requires its partners, contractors, and vendors, as well as their employees, agents and subcontractors, to embrace this commitment to integrity by complying with the Vendor Code of Conduct (the “Code”). All contractors, consultants, and vendors engaged in providing products and services to Life are expected to embrace this commitment to integrity by complying with the Code and communicating and enforcing the Code provisions throughout their organization and across their supply chain, including to sub-vendors and subcontractors. Henceforth in this document, the term “Vendor” is defined as all contractors, consultants, and vendors engaged in providing products and services to Life.

Vendor Code of Conduct:

1.0 Ethical Business Practices

Life Storage is committed to conducting our business in accordance with the highest ethical standards and in compliance with all applicable laws, rules, and regulations. We expect our Vendors to share our principles and uphold our standards and for each to develop policies and programs as appropriate to ensure that all workers understand and adhere to these standards.

1.1 Anti-Bribery

Life does not tolerate corruption or bribery in any form, and we expect our Vendors to fully comply with requirements of all applicable anti-corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act.

1.2 Privacy and Data Protection

We expect our Vendors to protect confidential information. Vendors must adopt and maintain processes to provide reasonable protections for personal, proprietary and confidential information, including information that they access, receive or process on behalf of Life. Information should not be used for any purpose beyond the scope of the business arrangement with the Company without prior authorization.

1.3 Grievance Mechanism

We expect our Vendors to have a process through which workers can raise workplace concerns without fear of retaliation. This process should be transparent and understandable to workers and should ensure the protection of accusers.

1.4 Licensing/Permits

Vendors must obtain all required licenses and permits to conduct business in applicable jurisdictions.

1.5 Antitrust

Vendors must comply with applicable antitrust and fair competition laws. Unethical business practices such as improper exchange of competitive information, price fixing, bid rigging, or improper market allocation are prohibited.

1.6 Conflicts of Interest and Fair Dealing

Vendors shall not offer gifts, favors or benefits that are intended, or could appear, to influence Life's employees to not act in Life's best interest.

1.7 Financial Responsibility/Accurate Records.

Vendors must accurately record, maintain, and report business records, including financial accounts, quality reports, time records, expense reports, and any submission to regulatory authorities.

2.0 Labor and Human Rights

We require our Vendors to treat people with respect and dignity, encourage diversity, promote equal opportunity for all, and help create an inclusive and ethical culture.

2.1 Wages and Benefits

Vendors must comply with all applicable wage and compensation requirements under applicable labor laws for regular work, overtime, maximum hours, piece rates, and other elements of compensation and employee benefits. Life encourages Vendors to work toward improving standards of living and quality of life for their employees and communities.

2.2 Working Hours

Workers should not be required to work more than the legal limits of working hours, overtime hours and number of working days per week. Workers shall be granted and correctly compensated for any types of paid leave or time off to which they are legally entitled under applicable law.

2.3 Forced Labor and Human Trafficking

Life does not tolerate forced labor or human trafficking in any form and Life will not knowingly work with Vendors who engage in these practices or permit their subcontractors to engage in these practices. We expect our Vendors to fully comply with requirements of applicable forced labor and human trafficking laws.

2.4 Child Labor

Vendors shall not employ child labor and should take the necessary preventive measures to ensure that they do not employ anyone under the applicable legal minimum age of employment. Such measures shall include age verification systems and training for managers and supervisors.

2.5 Inclusion and Non-Discrimination

Workers shall be treated with respect and dignity. Life requires Vendors to comply with all applicable laws regarding discrimination in hiring and employment practices. Life expects Vendors to maintain a workplace free of discrimination, harassment, victimization, and any other form of inappropriate behavior or abuse on any grounds including but not limited to age, disability, ethnic or social origin, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy, political convictions, religious beliefs, union affiliation, veteran status, or any other characteristic protected by law.

2.6 Harassment.

Harassment of employees, applicants, customers, contractors, vendors or suppliers by other employees is a violation of Life company policy. Similarly, harassment by Vendors of employees, applicants, customers, contractors, vendors or suppliers will not be tolerated. Harassment includes, without limitation, sexual harassment, verbal harassment, physical harassment and visual harassment. Life's position is that harassment is a form of misconduct that undermines the integrity of the employment relationship. Accordingly, Life requires all Vendors' conduct while under contract with Life Storage to meet or exceed Life's Discrimination and Harassment Prevention Policy, set forth on Exhibit A, and, in the case of Vendors providing services in the State of New York, the New York State Sexual Harassment Prevention Policy, set forth on Exhibit B.

3.0 Vendor Diversity and Inclusion

Life believes that diversity is a social and economic imperative and looks to Vendors to share in this commitment. Vendors are expected to take proactive steps to provide a full spectrum of businesses (such as, women, minority, and locally owned businesses) with the opportunity to compete on a fair and equal basis for business.

4.0 Environmental Stewardship

Environmental stewardship is an important aspect of how Life operates our business. Life encourages our Vendors to adhere to environmentally friendly based efforts appropriate to their businesses and aligned with best practices locally and globally.

4.1 Energy and Emissions

Life encourages our Vendors to manage and mitigate the environmental impact of their operations and strategies. Vendors are encouraged to establish greenhouse gas (GHG) emission reduction targets.

4.2 Water

Vendors are encouraged to take steps to conserve, reduce use of, and reuse water in their own operations. Vendors are also encouraged to manage water resources to meet or exceed local, state, and federal environmental requirements and regulations.

4.3 Waste

Vendors are encouraged to take steps to minimize or eliminate waste across their operations. Any waste, including hazardous waste, shall be managed in a responsible manner. Chemicals and other materials posing a hazard if released to the environment shall be handled and managed to meet or exceed local, state, and federal environmental requirements and regulations.

5.0 Management Systems and Governance

Life encourages Vendors to institute effective management systems that utilize the best available techniques and practices to adhere to this Code and continuously improve their performance. This should include a process for the identification and proactive mitigation of risks associated with compliance to this Code, as well as a process for ongoing monitoring and review of risk controls, and prompt and accurate reporting of all incidents. To that end, Vendors agree to report immediately any and all incidents that result in bodily injury to anyone (Life employee or otherwise) or property damage to Life property, no matter how minor the injury or damage (each, an “Incident”) to legalhelp@lifestorage.com and to Vendor’s primary point of contact at Life documenting the existence and details of the Incident.

6.0 Health & Safety

Vendors shall incorporate health and safety management practices into all aspects of their business, including those measures required to be implemented by federal, state and local authorities during pandemics. Vendors shall fully comply with local, state, and federal safety and health regulations. Vendors shall minimize employee and public exposure to potential safety hazards by appropriately identifying, assessing and minimizing risks.

Summary

This Code of Conduct sets forth Life's expectations for all Vendors contracted or doing business with Life Storage. Life expects all Vendors to meet our minimum expectations and to aspire to make continuous improvements to their businesses as noted herein across ethical, human and labor rights, diversity and inclusion, and environmental areas.

Any facts or circumstances which are likely to lead to any Vendor's inability to meet the requirements and expectations of this Code should be reported immediately to Life Storage.

If a Vendor is found to be in violation of the requirements of this Code, Life Storage shall be notified by the Vendor immediately, and to remedy any such violation in an expedited manner. Failure to do so may lead to the end of any current or future business relationships.

Life Storage reserves the right to modify this Code at any time in its sole discretion, without prior notice.

The contents of this Code are additional to and do not in any way affect or prejudice any of Life's rights and remedies under the relevant Vendor contracts.

The failure or omission by Life to notify the Vendor of any violations of the provisions of this Code at any time shall in no way constitute a waiver of requirements set forth above. In the event of any conflict or ambiguity between any provision of this Code and the terms and conditions of the contract between Life Storage and the Vendor, the provisions of that contract will prevail.

The Code may not cover every situation a Vendor may face. When in doubt or when there are questions or concerns about a violation of the Code, Vendors can seek guidance from the Life Storage's legal department, or the whistleblower hotline, at 1-844-964- 1674.

Vendors shall self-monitor their actions and shall be able to demonstrate their compliance with this Code upon Life Storage's request. If a Vendor is noncompliant, the Company reserves the right to take appropriate actions, including contract termination. Life Storage may require removal of any Vendor personnel who behaves in manner that is unlawful or incompatible with this Code. In instances where standards outlined in the Code differ from local, state, or federal laws, Vendors must respect these standards within the framework of the applicable laws. This document summarizes Life Storage's expectations from its Vendors.

Agreement & Acknowledgement

Contractors, Consultants, or Vendors confirm by the signature of an authorized employee that they have received, read, understood and will comply with this Code of Conduct.

Acknowledgement

By signing below, I certify that our company has received, read and understood and will abide by Life Storage's Vendor Code of Conduct and Life Storage's Discrimination and Harassment Prevention Policy, set forth on Exhibit A, and, where applicable, the New York State Sexual Harassment Prevention Policy, set forth on Exhibit B.

Company Name _____

Representative Name _____

Job Title _____

Signature _____ Date _____

Exhibit A

Life Storage LP

Discrimination and Harassment Prevention Policy

Policy

LIFE STORAGE LP (Life Storage) is committed to maintaining a workplace free from discrimination and harassment. To that end, Life Storage prohibits and will not tolerate discrimination or harassment in the workplace of, or by, employees, applicants for employment, interns (paid or unpaid), consultants, vendors, visitors, customers, contractors or subcontractors (“Covered Persons”), regardless of immigration status, based on an individual’s age, race, creed, color, national origin (including ancestry), religion, gender or sex, sexual orientation, pregnancy (including childbirth and related medical conditions), alienage or citizenship status (unless required by law), disability, marital status, domestic violence victim status, familial status, military status, genetic information or predisposing genetic characteristics, or any other protected status under federal, state, or local law.

All Covered Persons are responsible for complying with and upholding this policy. You may direct questions about this policy to any member of the Human Resources Department.

Discrimination and Harassment

Discrimination means any disparate or unequal treatment of a person that occurs because of a person’s protected status and in regard to employees includes disparate or unequal treatment relating to an employee’s privileges or terms and conditions of employment.

Harassment is a form of discrimination and includes, but is not limited to, conduct that is disrespectful, abusive or uncivil, that denigrates, disparages or intimidates a person, that creates a hostile or offensive work environment or that unreasonably interferes with a person’s work performance and which is directed at the person because of his or her protected status. Such conduct includes, but is not limited to, epithets, slurs, offensive remarks, innuendoes, threats, intimidation, jokes, vulgar comments, pictures, physical contact or other verbal, written, visual or physical conduct.

Conduct prohibited by this policy may occur either on or off the premises and either during working or non-working hours. Employees who engage in prohibited conduct will be subject to discipline, up to and including termination of employment, regardless of whether such conduct rises to the level of unlawful discrimination or harassment.

Sexual Harassment

Sexual harassment is one form of harassment prohibited by this policy. Sexual harassment includes harassment based on a person's sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and transgender status and can occur between males and females or persons of the same sex.

Sexual harassment means unwelcome conduct which is either of a sexual nature or which is directed at an individual because of that individual's sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and transgender status when:

- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment, even if the reporting individual is not the intended target of the sexual harassment;
- Such conduct is made either explicitly or implicitly a term or condition of employment;
- or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual's employment.

A sexually harassing hostile work environment includes, but is not limited to, words, signs, jokes, pranks, intimidation or physical violence which is of a sexual nature, or which is directed at an individual because of that individual's sex. Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, which cause the recipient discomfort or humiliation, which interfere with the recipient's job performance.

Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment. This is also called "quid pro quo" harassment.

Harassers can be a superior, a subordinate, a coworker or anyone in the workplace including an independent contractor, contract worker, vendor, client, customer or visitor.

Sexual harassment can occur while during business travel or at employer sponsored events or parties. Calls, texts, emails, and social media usage can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices or during non-work hours.

Although it is not possible to identify every act that can constitute sexual harassment, the following are examples of sexual harassment that are prohibited:

- Physical acts of a sexual nature, such as:
 - touching, pinching, patting, kissing, hugging, grabbing, brushing against another person's body or poking another person's body;
 - physical or attempted physical assault of any kind;
- Unwanted sexual advances or propositions, such as:
 - requests for sexual favors accompanied by implied or overt threats concerning the target's job performance evaluation, a promotion or other job benefits or detriments;
 - offers of employment benefits such as promotions, favorable evaluations, favorable duties or shifts in exchange for sexual favors;
 - requests for dates after being informed the interest is unwelcome;
 - subtle or obvious pressure for unwelcome sexual activities.
- Sexual innuendo and other vocal activity of a sexual nature.
- Sexually oriented gestures, noises, remarks or jokes or comments about a person's sexuality or sexual experience, which create a hostile work environment.
- Sex stereotyping which occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a particular sex should act or look.
- Sexual or discriminatory displays or publications anywhere in the workplace, such as:
 - displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace.
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender, such as:
 - interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job;
 - sabotaging an individual's work;
 - bullying, yelling, name-calling.

Employees working in New York are also subject to Life Storage's NYS Sexual Harassment Prevention Policy, which can be found on the Info Center under Human Resources, and should refer to that policy for all matters relating to sexual harassment.

Retaliation

Life Storage also prohibits and will not tolerate retaliation against any person who, in good faith, reports suspected discrimination or harassment or who provides information, testifies or otherwise assists in any investigation of or proceeding involving discrimination or harassment. Retaliation is also prohibited under federal and (where applicable) state and local laws.

Reporting of Discrimination, Harassment, and Retaliation

Preventing discrimination, harassment and retaliation is everyone's responsibility. Life Storage cannot remedy discrimination, harassment or retaliation unless it knows about them.

Any Covered Person who has witnessed or been subjected to any form of discrimination, harassment or retaliation should report the behavior to Human Resources. A listing of Human Resource Representatives can be found on the Info Center under Human Resources/HR Contact List. A complaint form for reporting such behavior is attached to this policy. You may also report the behavior to your Supervisor, Manager, Director, Vice President or member of the Executive Team, but if after doing so you are not contacted by Human Resources within two days you should report the conduct directly to Human Resources.

All supervisors and managers who receive a complaint or information about suspected discrimination, harassment or retaliation, who observe what may be discrimination, harassment or retaliation or for any reason suspect such conduct is occurring, are required to report the matter to Human Resources. A listing of Human Resource Representatives can be found on the Info Center under Human Resources/HR Contact List. Managers and supervisors who fail to report suspected discrimination, harassment or retaliation or who otherwise knowingly allow such conduct to continue will be subject to discipline, up to and including termination.

This provision prohibiting retaliation is not intended to protect persons making intentionally false charges of discrimination or harassment.

Investigation and Response

Life Storage will conduct a prompt and thorough investigation of all allegations of discrimination, harassment or retaliation in a confidential manner to the extent possible. If Life Storage determines that a violation of this policy has occurred it will take appropriate corrective action to effectively end such conduct and prevent it from reoccurring.

DISCRIMINATION AND HARASSMENT PREVENTION POLICY

COMPLAINT FORM

If you believe that you have been subjected to discrimination, harassment or retaliation in violation of Life Storage's Discrimination and Harassment Prevention Policy, you are encouraged to complete this form and submit it to Human Resources. A listing of Human Resource Representatives can be found on the Info Center under Human Resources/HR Contact List. You will not be retaliated against for filing a complaint.

You may also submit your complaint verbally or in another manner to a Human Resources Representative or your Supervisor, Manager, Director, Vice President or member of the Executive Team and if you do so Life Storage will complete this form and provide you with a copy and investigate the complaint in accordance with its policy. If you make a report to someone other than a Human Resources Representative and are not contacted by Human Resources within two days, then you should report the conduct directly to Human Resources.

YOUR INFORMATION

Name: _____

Work Address: _____ Work Phone: _____

Job Title: _____ Email: _____

Best way to contact you: Email Phone In person

SUPERVISORY INFORMATION

Immediate Supervisor's Name: _____

Title: _____

Work Address: _____ Work phone: _____

COMPLAINT INFORMATION

1. Your complaint is about: discrimination harassment retaliation
2. Please describe the type of discrimination or harassment (*e.g.*, age, race, *etc.*) you believe you experienced, or if complaining about retaliation identify the protected conduct you engaged in.

3. Your complaint is made about:

Name: _____ Title: _____

Work Address: _____ Work Phone: _____

Relationship to you: ___Supervisor ___Subordinate ___Co-Worker ___Other

4. Please describe what happened and how it is affecting you and your work. (Please use additional sheets of paper if necessary and attach any relevant documents or evidence.)

5. Date(s) conduct occurred: _____

Is the conduct continuing? ___Yes ___No

6. Please list the name and contact information of any witnesses or individuals that may have information related to your complaint.

The last question is optional, but may help the investigation.

7. Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

Signature: _____ Date: _____

EXHIBIT B

Life Storage LP

New York State Sexual Harassment Prevention Policy

Introduction

Life Storage LP (Life Storage) is committed to maintaining a workplace free from sexual harassment. All employees are responsible for complying with this policy to prevent discrimination and harassment in the workplace. This Sexual Harassment Prevention Policy is one component of Life Storage's commitment to a discrimination-free work environment.

All persons covered by this policy have a legal right to a workplace free from sexual harassment and can enforce this right by filing a complaint internally with Life Storage or with the appropriate federal, state or local administrative agency or in federal or state court.

Employees working in New York State are covered by both this policy and Life Storage's Discrimination and Harassment Prevention Policy, which can be found on the Info Center under Human Resources, but where an employee working in New York State complains about sexual harassment this policy shall take precedence.

This sexual harassment prevention policy has several components:

- **Application.** This policy applies to the following persons regardless of immigration status: all employees, applicants for employment, interns (paid or unpaid), and contractors, subcontractors, vendors, consultants and other persons providing services in the workplace pursuant to a contract with Life Storage or any of their employees who are providing services in the workplace. (All of these persons are referred to in the remainder of this policy singularly as "Covered Person" and collectively as "Covered Persons.")
- **Sexual Harassment Prohibited.** Sexual harassment is unlawful and is a form of sex discrimination. Sexual harassment is prohibited and will not be tolerated. Any Covered Person who engages in sexual harassment will be subject to disciplinary action up to and including termination.
- **Retaliation Prohibited.** Retaliation is unlawful and is prohibited. Life Storage will not take or tolerate any adverse employment action against any Covered Person who, in good faith, reports sexual harassment or who provides information, testifies or otherwise assists in any investigation of or proceeding involving sexual harassment. Any Covered Person who engages in such retaliation will be subject to disciplinary action, up to and including termination.

- **Liability for Sexual Harassment and Retaliation.** Sexual harassment and retaliation are forms of misconduct and violate Life Storage's policies and may subject Life Storage to liability for such harm to individuals. Persons who engage in sexual harassment and retaliation may also be subject to individual liability. Covered Persons of every level who engage in sexual harassment and/or retaliation, including managers and supervisors who engage in such conduct or who knowingly allow such conduct to continue, will be subject to disciplinary action up to and including termination.
- **Reporting by Covered Persons.** All Covered Persons are encouraged to report any behavior or conduct that violates this policy.
- **Reporting by Managers and Supervisors.** Managers and supervisors are required to report any complaint of sexual harassment or retaliation that they receive or any sexual harassment or retaliation that they observe or become aware of to Human Resources. A listing of Human Resource Representatives can be found on the Info Center under Human Resources/HR Contact List.
- **Investigation.** Life Storage will conduct a prompt and thorough investigation that ensures due process for all parties whenever management receives a complaint about sexual harassment or retaliation or otherwise knows of possible sexual harassment or retaliation occurring. Life Storage will keep the investigation confidential to the extent possible. Appropriate disciplinary action will be taken whenever sexual harassment or retaliation is found to have occurred. All employees, including managers and supervisors, are required to cooperate with any investigation.

Definition of Sexual Harassment

Sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender and can occur between males and females or persons of the same sex.

Sexual harassment includes unwelcome conduct which is either of a sexual nature or which is directed at an individual because of that individual's sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender when:

- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment, even if the reporting individual is not the intended target of the sexual harassment;
- Such conduct is made either explicitly or implicitly a term or condition of employment;
or

- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual's employment.

A sexually harassing hostile work environment includes, but is not limited to, words, signs, jokes, pranks, intimidation or physical violence which is of a sexual nature, or which is directed at an individual because of that individual's sex. Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, which cause the recipient discomfort or humiliation, which interfere with the recipient's job performance.

Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment. This is also called "quid pro quo" harassment.

Harassers can be a superior, a subordinate, a coworker or anyone in the workplace including an independent contractor, contract worker, vendor, client, customer or visitor.

Sexual harassment can occur while during business travel or at employer sponsored events or parties. Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices or during non-work hours.

Although it is not possible to identify every act that can constitute sexual harassment, the following are examples of sexual harassment and that are prohibited:

- Physical acts of a sexual nature, such as:
 - touching, pinching, patting, kissing, hugging, grabbing, brushing against another person's body or poking another person's body;
 - physical or attempted physical assault of any kind;
- Unwanted sexual advances or propositions, such as:
 - requests for sexual favors accompanied by implied or overt threats concerning the target's job performance evaluation, a promotion or other job benefits or detriments;
 - offers of employment benefits such as promotions, favorable evaluations, favorable duties or shifts in exchange for sexual favors;
 - requests for dates after being informed the interest is unwelcome;
 - subtle or obvious pressure for unwelcome sexual activities.
- Sexual innuendo and other vocal activity of a sexual nature.
- Sexually oriented gestures, noises, remarks or jokes or comments about a person's sexuality or sexual experience, which create a hostile work environment.

- Sex stereotyping occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people’s ideas or perceptions about how individuals of a particular sex should act or look.
- Sexual or discriminatory displays or publications anywhere in the workplace, such as:
 - displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace.
- Hostile actions taken against an individual because of that individual’s sex, sexual orientation, gender identity and the status of being transgender, such as:
 - interfering with, destroying or damaging a person’s workstation, tools or equipment, or otherwise interfering with the individual’s ability to perform the job;
 - sabotaging an individual’s work;
 - bullying, yelling, name-calling.

Definition of Retaliation

Life Storage prohibits retaliation against a Covered Person who engages in “protected activity,” which occurs when a Covered Person has:

- filed a formal complaint of sexual harassment either internally with Life Storage or externally with an administrative agency or a court of law;
- testified or assisted in an administrative or court proceeding involving sexual harassment;
- opposed sexual harassment by making a verbal or informal complaint to management or by informing a supervisor or manager of harassment;
- complained that another employee has been sexually harassed; or
- encouraged a fellow employee to report harassment.

Retaliation is unlawful under federal, state, and (where applicable) local law and can be any action that could discourage a person from coming forward to make or support a sexual harassment claim and need not be job-related or occur in the workplace to constitute unlawful retaliation (*e.g.*, threats of physical violence outside of work hours). Retaliation is prohibited even if the conduct complained about does not constitute sexual harassment. This policy prohibits retaliation even where it may not rise to the level of violating applicable law.

This provision prohibiting retaliation is not intended to protect persons making intentionally false charges of sexual harassment.

Reporting by Covered Persons

Preventing sexual harassment and retaliation is everyone's responsibility. Life Storage cannot prevent or remedy sexual harassment and retaliation unless it knows about them. Any Covered Person who has been subjected to or observes behavior that may constitute sexual harassment or retaliation is encouraged to report the behavior to a supervisor or manager or to Human Resources. A listing of Human Resource Representatives can be found on the Info Center under Human Resources/HR Contact List. If you make a report to someone other than a Human Resources Representative and are not contacted by Human Resources within two days, then you should report the conduct directly to Human Resources. Reports of sexual harassment and/or retaliation may be made verbally or in writing. A form for submission of a written complaint is attached to this policy, and all Covered Persons are encouraged to use this complaint form ("Complaint Form"). The Complaint Form is also available on the Info Center under Human Resources/HR and Payroll Forms. Covered Persons who are reporting sexual harassment or retaliation on behalf of other persons should use the Complaint Form and note that it is on another person's behalf.

Reporting by Managers and Supervisors Mandatory

All supervisors and managers who receive a complaint or information about suspected sexual harassment or retaliation, who observe what may be sexually harassing behavior or retaliation or for any reason suspect that sexual harassment or retaliation is occurring, are required to report the matter to Human Resources. A listing of Human Resource Representatives can be found on the Info Center under Human Resources/HR Contact List. Supervisors and managers who fail to report suspected sexual harassment or retaliation or who otherwise knowingly allow sexual harassment or retaliation to continue will be subject to disciplinary action, up to and including termination.

Supervisors and managers will also be subject to disciplinary action, up to and including termination, for engaging in any sexual harassment or retaliation.

Investigation of Complaints

All complaints of sexual harassment or retaliation will be investigated. Investigations will be conducted in a timely manner, and will be confidential to the extent possible.

While the process may vary from case-to-case, investigations will generally consist of the following steps:

- Conduct an immediate review of the allegation(s) and take any interim actions as appropriate.
- Obtain and preserve documents relevant to the allegation(s).
- Draft a list and summary of documents relevant to the allegation(s).
- Review documents relevant to the allegation(s).
- Interview all parties involved, including any relevant witnesses.
- Document the investigation.
- Retain the documentation in the employer's records.
- Notify the affected parties of the final decision and any corrective action as appropriate.
- Implement any corrective action as appropriate.

Inform the complainant of his or her right to pursue the legal protections and external remedies discussed in the next section of this policy.

Legal Protections and External Remedies

Sexual harassment and retaliation are not only prohibited by this policy but are also prohibited by state, federal, and, where applicable, local law.

Aside from Life Storage's internal processes, Covered Persons may also pursue legal remedies with the following governmental entities.

A. Equal Employment Opportunity Commission

The United States Equal Employment Opportunity Commission (EEOC) enforces federal anti-discrimination laws, including Title VII of the Civil Rights Act of 1964 (codified at 42 U.S.C. § 2000e *et seq.*). An individual can file a complaint with the EEOC anytime within 300 days from the harassment. Complaining internally does not extend the time to file with the EEOC. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint, and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court. The EEOC does not award relief but may take other action including pursuing cases in federal court on behalf of complaining parties. In general, private employers must have at least 15 employees to come within the jurisdiction of the EEOC.

If an employee believes that he or she has been discriminated against the employee can file a “charge of discrimination” with the EEOC. The EEOC has an office at 33 Whitehall Street, 5th Floor, New York, NY 10004. The EEOC can be contacted by telephone (1-800-669-4000) (TTY:1-800-669-6820) or email (info@eeoc.gov). The EEOC’s website is www.eeoc.gov.

B. New York State Division of Human Rights

The New York State Division of Human Rights (DHR) enforces the New York State Human Rights Law (HRL), codified at N.Y. Executive Law, art. 15, § 290 et seq., which applies to all employers in New York State with regard to sexual harassment, and protects employees, paid or unpaid interns and non-employees, regardless of immigration status. A complaint alleging violation of the Human Rights Law may be filed either with the DHR or in New York State Supreme Court.

Complaints may be filed with DHR any time within one year of the harassment. If an individual did not file at DHR, they can sue directly in state court under the HRL, within three years of the alleged sexual harassment. An individual may not file with DHR if they have already filed a HRL complaint in state court.

Complaining internally to Life Storage does not extend the time to file with DHR or in court. The one year or three years is counted from date of the most recent incident of harassment.

You do not need an attorney to file a complaint with DHR, and there is no cost to file with DHR.

DHR will investigate your complaint and determine whether there is probable cause to believe that sexual harassment has occurred. Probable cause cases are forwarded to a public hearing before an administrative law judge. If sexual harassment is found after a hearing, DHR has the power to award relief, which varies but may include requiring an employer to take action to stop the harassment, or redress the damage caused, including paying of monetary damages, attorney’s fees and civil fines.

DHR’s main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458. You may call (718) 741-8400 or visit, www.dhr.ny.gov.

Contact DHR at (888) 392-3644 or visit dhr.ny.gov/complaint for more information about filing a complaint. The website has a complaint form that can be downloaded, filled out, notarized and mailed to DHR. The website also contains contact information for DHR’s regional offices across New York State.

C. Local Protections

The New York City Human Rights Law (NYCHRL) prohibits sexual harassment against employees in New York City. An employee can file a complaint of sexual harassment under the NYCHRL with the New York City Commission on Human Rights (NYCCHR) or in New York state court. An employee must file their complaint with the NYCCHR or in state court within three years of the alleged harassment.

Under the NYCHRL, courts may award back pay, front pay, compensatory and punitive damages, and attorney's fees, expert fees, and costs.

The NYCCHR's main office is at 40 Rector Street, 10th Floor, New York, New York. You can also contact them by phone (718-722-3131). Their website is www.nyc.gov/html/cchr/html/home/home.shtml.

Other localities may have their own laws protecting individuals from sexual harassment. An employee may contact the county, city, or town in which they work or live to find out if such a law exists.

**Life Storage LP
NYS Sexual Harassment Prevention Policy
Complaint Form**

New York State Labor Law requires all employers to adopt a sexual harassment prevention policy that includes a complaint form to report alleged incidents of sexual harassment and retaliation.

If you believe that you have been subjected to sexual harassment or subjected to retaliation for reporting sexual harassment or assisting in an investigation of sexual harassment, you are encouraged to complete this form and submit it to Human Resources. A listing of Human Resource Representatives can be found on the Info Center under Human Resources/HR Contact List. You will not be retaliated against for filing a complaint.

You may also submit your complaint verbally or in another manner to your HR Representative or your Supervisor, Manager, Director, Vice President or member of the Executive Team and if you do so LIFE STORAGE will complete this form and provide you with a copy and investigate the complaint in accordance with its policy. If you make a report to someone other than a Human Resources Representative and are not contacted by Human Resources within two days, then you should report the conduct directly to Human Resources.

YOUR INFORMATION

Name: _____

Work Address: _____ Work Phone: _____

Job Title: _____ Email: _____

Best way to contact you: _____Email _____Phone _____In person

SUPERVISORY INFORMATION

Immediate Supervisor's Name: _____

Title: _____

Work Address: _____ Work phone: _____

COMPLAINT INFORMATION

1. You complaint is about: _____sexual harassment _____retaliation

2. Your complaint is made about:

Name: _____ Title: _____

Work Address: _____ Work Phone: _____

Relationship to you: ___Supervisor ___Subordinate ___Co-Worker ___Other

3. Please describe what happened and how it is affecting you and your work. (Please use additional sheets of paper if necessary and attach any relevant documents or evidence.)

4. Date(s) conduct occurred: _____

Is the conduct continuing? ___Yes ___No

5. Please list the name and contact information of any witnesses or individuals that may have information related to your complaint.

The last question is optional, but may help the investigation.

6. Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

If you have retained legal counsel and would like us to work with them, please provide their contact information.

Signature: _____ Date: _____