

CubeSmart Code of Ethics, Conduct & Human Rights for Vendors and Suppliers

CubeSmart, L.P., and its subsidiaries (collectively, “CubeSmart”) have adopted this Code of Ethics, Conduct & Human Rights for Vendors and Suppliers (“Code”) to set forth our expectations regarding the conduct and policies of our vendors and suppliers. The principles set forth in this Code follow the same high standards that CubeSmart follows every day in its business dealings. We want to ensure that our supply chain conducts and transacts business with vendors and suppliers that have the same high standards of conduct, ethics and respect for human rights as CubeSmart. This Code is designed to align CubeSmart’s leadership and growth in a sustainable, responsible fashion with all vendors and suppliers of goods, services and/or products.

This Code sets forth the requirements CubeSmart has for its vendors and suppliers regarding fundamental ethics, business conduct and human rights. Each CubeSmart vendor and supplier is required to understand and follow the requirements of this Code. All references in this Code to “Laws” means all applicable laws, statutes, ordinances, directives, rules, regulations, orders, resolutions, decrees, and governmental orders. “Vendor” or “Vendors” shall mean all contractors, service providers, suppliers, vendors, producers, professionals and any other person or entity that receives compensation in any form from CubeSmart in exchange for goods, services or advice.

ETHICAL BUSINESS CONDUCT

1. Anti-Corruption and Anti-Bribery. Vendor is expected to compete solely on the merits of their services and products. Vendor should not offer or promise anything of value (including, without limitation, cash, gifts, contributions, or courtesies) with the intent of inducing anyone to forego their duties and provide unfair business advantage. Vendor will not engage in any form of corrupt practices including, without limitation, fraud, extortion, impersonation, false declarations, bribery, money laundering, supporting or involvement with terrorist or organized crime activities. Vendor will encourage its employees, representatives, and subcontractors to, comply with all Laws relating to anti-corruption, anti-money laundering, and the prevention of fraud and other financial crime.

2. Antitrust. Vendor shall refrain from engaging in any illegal, anti-competitive conduct or deceptive trade practice for any reason whatsoever, whether on behalf of CubeSmart, Vendor, or others. Vendor must avoid unethical practices such as improper exchange of competitive information, bid rigging, price fixing, or exchange of customers’, CubeSmart’s, Vendor’s, or others’ competitively sensitive information (including, without limitation, price, cost, and technical data) with CubeSmart’s competitors or competitors of Vendor. Vendor should also refrain from abusing their market power, whether for their benefit or for the benefit of others, by refusing to deal fairly, engaging in predatory or discriminatory pricing practices, conditioning the sale or provision of a product or service with that of another product or service, or undertaking similar abusive tactics. Vendor should not engage in other deceptive or unfair market practices, whether on behalf of CubeSmart, Vendor, or others. Further, Vendor should never make any misrepresentations

relating to the products or services of CubeSmart, Vendor or others.

3. OFAC. Vendor shall not be the target of any Laws administered by the United States Department of the Treasury's Office of Foreign Assets Control ("OFAC") or any other governmental entity imposing economic sanctions or trade embargoes ("Economic Sanctions Laws"). Vendor is not located, organized, or resident in a country or territory that is, or whose government is, the target of sanctions imposed by OFAC or any other governmental entity. Vendor shall promptly notify CubeSmart if Vendor or any of its subsidiaries becomes the target of any Economic Sanctions Laws, or the country or territory where any of them is located, organized, or resident becomes the target of sanctions imposed by OFAC or any other governmental entity.

4. Licensing/Permits. Vendors must obtain all required permits and licenses to conduct business according to the local Laws.

5. Conflict of Interest. Vendors must avoid offering gifts, benefits, or favors that are intended (or could appear) to influence CubeSmart's teammates to act in their personal interest rather than CubeSmart's best interest. Vendors must avoid unfair dealing.

LABOR AND HUMAN RIGHTS

We expect our Vendors to treat all people with dignity and respect, encourage equal opportunity for all and help create a diverse and inclusive culture. We expect our Vendors to enforce similar practices and policies that apply to all workers, Vendors, and their supply chains, including temporary, seasonal and migrant workers.

1. Child Labor. Vendor will not engage in or promote the unlawful employment or exploitation of children in the workplace. Vendor will be committed to combating the exploitation of children, and therefore prohibit any use of child labor with any Vendor or other third-party arrangements. Vendor is expected to cooperate with law enforcement authorities to address any such instances of child labor of which Vendor becomes aware.

2. Human Trafficking, Slavery, and the Right to Voluntary Labor. All labor must be voluntary. Vendor will respect the free choice of all persons and strictly prohibit forced or compulsory labor for any employees. Vendor will refrain from doing business with, tolerate, or associate with organizations or entities that condone or are engaged in the practice of coercing or imposing work with little or no freedom of choice. Vendor shall not require any worker to surrender control over a worker's identification papers or documents that give a foreign worker the right to work in, enter or leave the country.

3. Inclusion and Non-Discrimination. CubeSmart expects all workers to be treated with respect and dignity. Vendor will proactively invest in equality, diversity, and inclusion initiatives. Vendor will ensure that its workplace is free of harassment and discrimination based on a person's status such as race, color, religion, national origin, gender, sexual orientation, gender identity, age, disability, veteran or military status, or other factors or characteristics protected by Law. Vendor will ensure that it has requisite policies and practices in place to promote such equality, diversity, and inclusion, and foster a harassment and retaliation free environment.

4. Safe and Secure Workplace. Vendor will provide a safe and secure workplace for all employees, and prevent accidents to employees, customers, and visitors. Vendor shall not subject workers to corporal punishment, or physical, verbal, sexual, or psychological abuse or harassment. Vendor must not condone or tolerate such behavior by any of its suppliers. Vendor's leadership will ensure compliance with this commitment in every location and facility in which Vendor operates.

5. Working Hours and Wages. Vendor will comply with all Laws dealing with the wages Vendor pays its employees and the hours they work. Vendor will be committed to be an ethical employer that strives to improve labor standards, respects its employees'

contributions, and rewards them fairly.

6. Freedom of Association. Vendor will respect the rights of employees and comply with all Laws concerning freedom of association and collective bargaining.

7. Freedom of Movement. Vendor shall ensure that Vendor's workers have the right to freedom of movement without delay, hindrance; or the threat or imposition of any discipline, penalty, retaliation, or fine or other monetary obligation. Worker freedom of movement rights include each worker's right to leave their workplace without retaliation at the end of each workday or based on reasonable health, safety-related or other reasonable circumstances.

HEALTH AND SAFETY

Vendor shall incorporate health and safety management practices into all areas of their business to protect employees and visitors. Vendor shall provide a safe, healthy, and sanitary working environment to prevent workplace hazards, and work-related accidents and injuries.

General and industry-specific procedures and safeguards include those relating to:

- health and safety inspections;
- equipment maintenance;
- maintenance of physical plants;
- worker training covering the hazards typically encountered in their scope of work;
- fire prevention; and
- documentation and recordkeeping.

Vendor shall provide workers adequate and appropriate personal protective equipment to protect workers against hazards typically encountered in the scope of work.

ENVIRONMENTAL SUSTAINABILITY

Vendor recognizes that adverse effects on the community, environment and natural resources should be minimized to safeguard the health and safety of the public. To achieve this objective, Vendor should observe and comply with all applicable environmental Laws, including, without limitation, those which relate to (i) obtaining and maintaining required environmental permits, approvals and registrations, as well as complying with applicable operational and reporting requirements; (ii) the handling, removal, transportation and disposal of hazardous materials used by Vendor; and (iii) monitoring, controlling, treating and sanitizing air emissions, waste water and solid wastes. Vendor will seek opportunities that promote the efficient use of resources and energy, as well as clean and low energy solutions.

FINANCIAL INTEGRITY

Vendor must accurately record, maintain, and report business records, including financials, quality reports, time records, expense reports and any required submissions to regulatory authorities.

COMPLIANCE WITH LAWS

Vendor shall comply with all applicable national and local laws and regulations, including laws and regulations relating to this Code. Where this Code requires Vendor to meet a higher standard than set out by law or regulation, Vendor shall meet such higher standards.

TRANSPARENCY AND COMPLIANCE VERIFICATION

CubeSmart expects that all current and future Vendors adhere to this Code and join CubeSmart in our efforts to become more socially and environmentally responsible. Vendors must self-monitor and should be able to prove compliance with this Code upon CubeSmart's request. The contents

of this Code are additional to and do not in any way affect or prejudice any of CubeSmart's rights and remedies under the relevant contracts with each Vendor, if any.

Any facts or circumstances that lead to your inability to meet the requirements and expectations of this Code should be immediately reported to your designated business contact at CubeSmart.

Encounters that you believe to be a violation of this Code, local laws, regulations, or unethical behavior should be reported to our whistleblower hotline. Retaliation of any kind against an individual who reports in good faith violates CubeSmart's principles and will not be tolerated.

The reporting hotline (available 24 hours a day, 7 days a week) is:

☐ 1-866-291-6644

Reports can also be made via email at: cube@openboard.info