



LIFE STORAGE WASTE MANAGEMENT POLICY

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LIFE STORAGE WASTE MANAGEMENT POLICY

1. PURPOSE

Life Storage has implemented this waste management policy to:

1. Promote responsible waste management practices across the company
2. Reduce the amount of waste hauled to and disposed of in landfills or incineration facilities
3. Ensure proper handling and disposal of non-hazardous waste
4. Conserve natural resources and protect public health in our communities
5. Generate less waste through best practices

2. OFFICES & FACILITIES

A. *Scope*

This policy applies to all ongoing waste leaving the following locations:

1. Life Storage Home Office (Buffalo, NY)
2. Life Storage Facility Offices
3. Life Storage Remote Work from Home Offices (policy applies when an associate is reasonably able to comply)

This policy encompasses the following waste types:

1. **Ongoing Consumables**, including but not limited to:
 - Paper
 - Cardboard
 - Glass
 - Plastic
 - Metals
2. **Durable Goods**, including but not limited to:
 - Electric-powered equipment (computers, copiers, printers, appliances, etc)
 - Furniture
3. **Compact Fluorescent Lights (CFL)**, including but not limited to:
 - Recyclable batteries
 - LEDs
 - Ballasts



B. Procedures

The following strategies and best practices encourage adherence to this policy:

a. Paperless operations initiative

- Company-wide effort to significantly reduce the use of paper documents at both the Home Office and Store level through more efficient technology platforms and revised employee processes
- Such documents include, but are not limited to, customer leases, communications, design drawings and specifications, and contractor proposals

b. CFL's and electronic e-waste recycling

- All electronics equipment to be disposed of is collected by a third-party DEC-registered vendor that appropriately recycles equipment by focusing on efficient extraction and categorization of reusable materials
- At the store level, electronic office equipment to be disposed of is shipped to Home Office and is recycled according to the above procedure if it is not deemed reusable
- CFL's, ballasts, LED's, and rechargeable batteries are disposed of in accordance with EPA. Contractors are responsible for the proper disposal of large quantities of these materials generated as a result of capital improvements or new construction (see section 3)
 - Building supply stores often offer free recycling of these materials. Additionally, store teams can call 1-800-CLEANUP to find other local recycling locations.
- E-waste collection & recycling events held at Home Office annually

c. Home Office

- Life Storage associates at Home Office are encouraged to reduce their overall waste output and to appropriately segregate and recycle waste
- Clearly labeled recycling bins and signage are provided in common areas and employee kitchen areas to collect white paper, mixed paper, newspaper, cardboard, recyclable glass, and plastics. Separate waste containers are used for food waste and non-recyclables
- Recycling containers are made available to all employees as well as reusable water bottles, mugs, and silverware to reduce disposal of single-use items such as cups and plastic utensils



- Home Office cleaning contractor collects recycled content, ensures proper segregation, and places it in the appropriate recycling enclosure

d. Store & remote home offices

- Life Storage associates at the store level, as well as associates working remotely, are encouraged to reduce their overall waste output and to practice responsible recycling whenever possible

C. Responsible parties

At Life Storage Home Office, the Facilities Management, Operations, and Human Resources departments share responsibility for implementation of and compliance with this policy. Department heads are responsible for the oversight of this policy in each respective department.

At Store Offices, store teams are responsible for the implementation of this policy. Additional oversight is provided by Area Managers, Regional Vice Presidents, and Facility and Expansion Project Managers.

The Operations department is also responsible for coordination with contracted waste management provider(s) to ensure compliance with this policy.

3. CAPITAL IMPROVEMENTS

A. Scope

This policy applies to all waste accrued during the commission of capital improvement and new construction projects at Life Storage facilities for which Life Storage maintains operational control.

This policy encompasses the following waste types:

1. **Nonhazardous construction and demolition materials**, including but not limited to:
 - Insulation
 - Nails
 - Electrical wiring
 - Rebar
 - Wood
 - Plastic
 - Scrap metal

2. **Hazardous construction and demolition materials**, including but not limited to:



- CFL's
- Ballasts
- Capacitors
- Asbestos

B. Procedures

The following strategies and best practices encourage adherence to this policy:

A. Facility replacement standards

- All waste accrued during facility improvements and/or upgrades must be properly recycled

B. Contractor requirements

- All contractors hired by Life Storage to complete a construction project are required to recycle accrued waste in accordance with Federal Laws and governing agencies.

C. Construction projects with a scope of work that includes demolishing existing buildings

- Nonhazardous construction and demolition materials that are recyclable, such as steel and concrete, are recycled
- Separate dumpsters for recyclable waste are available on-site for contractor use
- Per Life Storage contract documents, contractors must dispose of hazardous materials in accordance with guidelines imposed by agencies such as DEC, EPA, and DOT. Of critical importance is compliance with TSCA and CERCLA laws

C. Responsible parties

The Life Storage construction management department is responsible for the implementation of this policy. Life Storage Facility and Expansion Project Managers are responsible for ensuring proper contractor compliance with this policy.