



Digital Realty
Supplier Code
of Conduct

Digital Realty Trust, L.P. Supplier Code of Conduct

Digital Realty Trust, L.P. (including its subsidiaries, the “Company”) is committed to conducting business in a legal, ethical, transparent and professional manner. The Company expects the highest ethical conduct from its employees and partners. Accordingly, we expect that our suppliers will share and embrace the letter, values and spirit of our business practices, including those set forth in this supplier code of conduct (the “Supplier Code of Conduct”).

TABLE OF CONTENTS

I	PURPOSE AND INTRODUCTION
II	CORE COMPANY PRINCIPLES <ul style="list-style-type: none">A. Business is conducted lawfully.B. Work is conducted on the basis of freely agreed upon and documented terms of employment.C. All employees, agents and representatives are treated equally with respect and dignity, and are not discriminated against.D. Work is conducted on a voluntary basis and all employees, agents and representatives are of an appropriate age.E. All employees, agents and representatives are paid fair wages and work reasonable working hours.F. Health and safety are protected at work.G. Business is conducted in a manner which embraces sustainability and reduces environmental impact.
III	MANAGEMENT

I. PURPOSE AND INTRODUCTION

It is essential that employees of the Company conduct themselves at all times with integrity, and in full compliance with the laws and regulations that govern the Company's global business. To that end, the Company has established and adheres to a Code of Business Conduct and Ethics (available at www.digitalrealty.com), which contains general guidelines, applicable to all of the Company's directors, officers, employees and agents, for conducting the business of the Company consistent with the highest ethical standards.

It is the Company's expectation that its suppliers will share this commitment to integrity. The Company understands that its suppliers are independent entities, but the business practices and actions of a supplier may reflect upon the Company's reputation and brand. As a result, it is the expectation of the Company that all suppliers and their employees, agents and subcontractors adhere to the Supplier Code of Conduct while they are conducting business with and/or on behalf of the Company. All suppliers should educate their representatives to ensure they understand and comply with the Supplier Code of Conduct.

This Supplier Code of Conduct supersedes and replaces any previous versions of the Supplier Code of Conduct. Any reference to the Supplier Code of Conduct in any documentation or contracts with a supplier is intended to refer to this Supplier Code of Conduct, which is maintained and updated from time to time at www.digitalrealty.com.

II. CORE COMPANY PRINCIPLES

The Company expects the highest standards of behavior from its employees and those with whom it does business. By becoming a supplier of the Company, you are stating that you share the Company's core principles. In this section of the Supplier Code of Conduct, the Company describes the requirements for its suppliers to establish and maintain a business relationship with the Company.

A. BUSINESS IS CONDUCTED LAWFULLY.

The Company's suppliers and suppliers' representatives shall conduct their business activities in full compliance with all applicable laws and regulations.

In addition to any specific obligations under the suppliers' agreement with the Company, all suppliers shall, without limitation:

- Comply with all applicable anti-corruption laws, including, without limitation, the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, and not make any illegal direct or indirect payments or promises of payments to obtain or retain business.
- Conduct business in full compliance with all applicable antitrust and fair competition laws.
- Comply with all applicable health and safety laws and regulations.
- Comply with all applicable environmental laws and regulations regarding hazardous materials, air emissions, waste and wastewater discharges, including the manufacture, transportation, storage, disposal and release into the environment of such materials.
- Conduct employment practices in compliance with all applicable laws and regulations, including, without limitation, respecting the rights of employees to associate freely, join labor unions, seek representation and engage in collective bargaining.
- Comply with all laws and regulations regarding the privacy of information, data protection and cross border data flows.
- Be transparent and honest in discussions with regulatory agency representatives, auditors and government officials.
- Obtain necessary permits and licenses to conduct the activities for which they have been hired by the Company.

- Provide services in compliance with supplier's own applicable professional standards, including requirements established by any organizations that regulate their activities.
- Create, retain and dispose of business records in full compliance with all applicable legal and regulatory requirements.
- Comply with all Company requirements for confidentiality, security and privacy procedures as a condition of receiving access to the Company's information, network, systems and buildings. The Company may monitor all uses of its corporate networks and systems and/or access all data stored or transmitted using the Company network.
- Comply with the intellectual property ownership rights of the Company and others, including but not limited to copyrights, patents, trademarks and trade secrets, and use software, hardware and content only in accordance with their associated licenses or terms of use.
- Speak to the public/press regarding the Company only if supplier and/or its representative is expressly authorized in writing to do so by the Company.
- Not engage in or support insider trading by buying or selling the Company's or another company's stock while in possession of material nonpublic information about the Company or another company.

B. WORK IS CONDUCTED ON THE BASIS OF FREELY AGREED UPON AND DOCUMENTED TERMS OF EMPLOYMENT.

Supplier shall have adopted and implemented policies that respect and safeguard rights under employment arrangements, contracts and other applicable laws.

C. ALL EMPLOYEES, AGENTS AND REPRESENTATIVES ARE TREATED EQUALLY WITH RESPECT AND DIGNITY, AND ARE NOT DISCRIMINATED AGAINST.

Suppliers shall ensure that their representatives, employees and agents are treated with respect and dignity. No supplier representative, employee or agent shall be subjected to any physical, sexual, psychological or verbal harassment, abuse or other form of intimidation. Suppliers shall ensure equal treatment of all representatives, employees and agents. No employee will be unfairly disadvantaged, favored or ostracized due to ethnic or racial status, nationality, descent, religion, gender, age, physical appearance, sexual orientation, political affiliation or parental status.

D. WORK IS CONDUCTED ON A VOLUNTARY BASIS AND ALL EMPLOYEES, AGENTS AND REPRESENTATIVES ARE OF AN APPROPRIATE AGE.

Employment must be voluntary. Forced labor is not acceptable. Mental and physical coercion, slavery and human trafficking are prohibited. Under no circumstances will supplier employ workers under the minimum age for work or mandatory schooling, whichever is greater, as specified by applicable law.

E. ALL EMPLOYEES, AGENTS AND REPRESENTATIVES ARE PAID FAIR WAGES AND WORK REASONABLE WORKING HOURS.

Suppliers shall ensure that their representatives, employees and agents are provided with a total compensation package that meets or exceeds the legal minimum standards or appropriate prevailing industry standards. Working hours may not exceed the maximum amount permitted by applicable law.

F. HEALTH AND SAFETY ARE PROTECTED AT WORK.

In addition to complying with applicable legal and regulatory requirements, the Company expects suppliers to ensure a safe work environment and minimize hazards through proper design, engineering and administrative controls, preventative maintenance and safe work procedures, as well as, ongoing safety training, audits and corrective actions as applicable to the services or products they provide.

G. BUSINESS IS CONDUCTED IN A MANNER WHICH EMBRACES SUSTAINABILITY AND REDUCES ENVIRONMENTAL IMPACT.

The Company is committed to avoiding adverse impact and injury to the environment and the communities in which it conducts business. Suppliers must comply with all applicable laws, regulations and Company standards with respect to sustainability and environmental requirements. The Company encourages its suppliers to consider and implement processes designed to reduce the impact on the environment in the services or products they provide. In addition to complying with applicable legal and regulatory requirements, the Company is committed to driving efficiency of power consumption and sustainable resource management practices in its datacenter design solutions and operations, equipment selection, deployment of construction and applying principles depicted in ASHRAE, LEED and BREEAM guidelines.

III. MANAGEMENT

AUDITS; OPERATING EFFECTIVENESS OF SUPPLIER; INVESTIGATIONS

The Company expects its suppliers to make available to it, upon request, a copy of any audit that has been performed on the controls and/or operating effectiveness of the supplier. The Company expects each supplier to respond to requests for information about compliance with this Supplier Code of Conduct.

The Company expects each supplier hired by the Company to cooperate with audits conducted by or on behalf of the Company. The Company expects each supplier hired by the Company to cooperate with it in any investigation it or the supplier may be conducting into an allegation of inappropriate or unethical behavior involving either a Company employee or an employee of a supplier where the allegation involves the Company.

TRAINING AND COMPLIANCE WITH THE SUPPLIER CODE OF CONDUCT

It is the responsibility of the supplier to ensure its employees and representatives understand and comply with the Supplier Code of Conduct and to inform the Company if and when a situation develops that causes the supplier to be in violation of this Supplier Code of Conduct.

REPORTING NON-COMPLIANCE

1. Any failure to comply with this Supplier Code of Conduct, of which supplier is aware, should be immediately reported to the Company. The failure to do so will be a breach of this Supplier Code of Conduct.
2. The Company will investigate any reported violation and discuss its findings with the supplier. The supplier shall assist with any such investigation and provide access to any information reasonably requested by the Company or its representative.
3. If remediation is required, the supplier will be expected to inform the Company and implement a corrective action plan and timeline to effectively and promptly resolve the failure.

NO THIRD PARTY RIGHTS

The Supplier Code of Conduct does not confer, nor shall it be deemed to confer, any rights on the part of third parties, including any third-party beneficiary rights. For example, no employees of any supplier shall have any rights against the Company by virtue of this Supplier Code of Conduct, nor shall such employees have any rights to cause the Company to enforce any provisions of this Supplier Code of Conduct, the decision with respect to any such actions being reserved by the Company in its sole discretion.

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