

# Digital Realty

## 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”).

### **PURPOSE AND INTRODUCTION**

It is essential that employees of the Company always conduct themselves 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](http://www.digitalrealty.com)), which contains general guidelines, applicable to all the Company’s directors, officers, employees, contractors, vendors, 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 its Suppliers and their suppliers, employees, agents, and subcontractors adhere to the Supplier Code of Conduct and all referenced declarations, principles, and conventions while they are conducting business with and/or on behalf of the Company. All Suppliers should educate their directors, officers, employees, contractors, agents, and 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 between the Company (including any of its affiliates) and a Supplier refers to this Supplier Code of Conduct, which is maintained and available at [www.digitalrealty.com](http://www.digitalrealty.com). The Company reserves the right to update, amend and/or supplement this Supplier Code of Conduct from time to time and at any time, and such updates, amendments and/or supplements will supersede and replace any previous version of this Supplier Code of Conduct.

### **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. We believe in transparency, fairness, and accountability in all our business dealings. Upholding respect for human rights, promoting diversity and inclusion, and fostering a safe and healthy working environment are not just initiatives, but integral components of how we operate. Our company is dedicated to innovation, sustainability, and continuous improvement, aiming to leave a positive impact on society and the environment. We believe in conducting our business with honesty, fairness, and the

highest regard for legal compliance, aiming to create enduring value for our stakeholders and the communities we serve.

## LEGAL COMPLIANCE

The Company requires all Suppliers and their representatives to conduct business activities in full compliance with all applicable laws and regulations. Suppliers must operate within the legal framework of the regions and industries in which they conduct business. This includes, but is not limited to, compliance with local, national, and international laws, trade regulations, environmental regulations, labor laws, and data protection laws. Suppliers are expected to stay informed about any changes in laws or regulations that may affect their operations and promptly adapt their practices to remain compliant. In addition to any specific obligations under the Suppliers' agreement with the Company, all Suppliers shall, without limitation:

Anti-Corruption: Comply with all applicable anti-bribery and anti-corruption laws, including, the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act, refraining from making or receiving any illegal direct or indirect payments or promises of payments (or anything of value) to obtain or retain business or a business advantage.

Antitrust and Fair Competition: Conduct business in full compliance with all applicable antitrust and fair competition laws. This includes refraining from engaging in activities that could result in anti-competitive practices, price-fixing, market allocation, or any other conduct that violates fair competition principles and regulations.

Data & Record Retention: Create, retain, and dispose of business records in full compliance with all applicable legal and regulatory requirements.

Employment Practices: 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.

Environmental 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.

Health and Safety: Comply with all applicable health and safety laws and regulations. Suppliers are required to provide a safe working environment for their employees and ensure that all business activities are conducted in accordance with the prescribed health and safety standards to prevent accidents, injuries, and occupational health hazards.

Insider Trading: 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.

International Trade and Sanctions: Comply with all applicable international trade and sanctions laws. This includes, but is not limited to, adherence to trade embargoes, export controls, and sanctions imposed by relevant international bodies or authorities.

Permits and Licenses: Obtain and maintain all necessary permits and licenses required to conduct their activities for the Company. Compliance with legal obligations related to permits and licenses relevant to their business operations is mandatory.

Privacy and Data Protection: Comply with all laws and regulations regarding the privacy of information and data protection. Suppliers are expected to handle confidential data responsibly, ensuring its

protection from unauthorized access, disclosure, or misuse. This includes compliance with cross border data flow regulations and safeguarding sensitive information.

Transparent Communications: Be transparent and honest in discussions with regulatory agency representatives, auditors, and government officials.

Additional Obligations:

Suppliers are also required to:

- Provide services in compliance with Supplier's own applicable professional standards, including requirements established by any organizations that regulate their activities.
- 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.

## LABOR AND HUMAN RIGHTS

The Company is committed to developing an organizational culture with policies that support internationally recognized human rights and seeks to avoid complicity in human rights abuses. We support the principles contained within the United Nations Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, the Global Network Initiative Principles, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

These principles are integral to our Supplier Code of Conduct, which our Suppliers are mandated to follow. Suppliers must adhere to policies respecting and upholding rights under employment arrangements, contracts, and relevant laws.

Equal Treatment and Dignity: All individuals, including employees, agents, and representatives, must be treated equitably, with respect and without discrimination. The Company, along with its Suppliers, prohibits the use of forced labor in any form, including prison, indentured, or bonded labor. No person below the age of 15, or below the mandatory education completion age, is to be employed. We support freedom of association and protection of the right to organize and collectively bargain.

Protection from Discrimination and Harassment: All employees, agents, and representatives are to be treated with respect and dignity, free from unlawful harassment or discrimination in accordance with applicable law. Suppliers must ensure a work environment free from physical, sexual, psychological, or verbal harassment, intimidation, or unequal treatment based on ethnic or racial status, nationality, descent, religion, gender, age, appearance, sexual orientation, political affiliation, parental status, or any other status that is protected by applicable local or national law.

Voluntary Employment and Appropriate Age: Employment must be voluntary, with zero tolerance for any forced labor, servitude, slavery, or human trafficking. Suppliers are required to prevent the employment of workers below the minimum legal age for work or compulsory education. We expect Suppliers to have effective systems and controls in place to safeguard against any form of modern slavery taking place within their business and/or our supply chain.

Fair Compensation and Reasonable Working Hours: Suppliers shall ensure that their representatives, directors, employees, contractors, and agents receive fair compensation that complies with legal standards or industry norms. Working hours may not exceed the maximum limits established by applicable law.

## HEALTH AND SAFETY

In addition to complying with applicable legal and regulatory requirements, the Company requires Suppliers to ensure a safe work environment and minimize hazards through effective design, engineering and administrative controls, preventative maintenance, and safe work procedures. Suppliers are also expected to provide continuous safety training, conduct audits and take corrective actions as applicable to the services or products they provide.

## SUSTAINABILITY AND ENVIRONMENTAL IMPACT

The Company is committed to preventing adverse environmental impact and harm to the communities where it operates. Suppliers must comply with all applicable laws, regulations and Company standards concerning sustainability and environmental norms. The Company encourages its Suppliers to consider and implement processes designed to mitigate their environmental impact in the services or products they provide. This includes measures to reduce energy consumption, air pollution, water use, biodiversity impacts and waste generation.

Suppliers are requested to quantify the carbon footprint of their products and services provided to the Company and to make that data available upon request. If this information is not available at the time of the request, the Supplier must provide a valid explanation as to why and make diligent efforts to supply the data as soon as possible thereafter.

In addition to complying with applicable legal and regulatory requirements, the Company is committed to enhancing power efficiency and implementing sustainable resource management practices in its datacenter and building design solutions and operations, equipment selection, deployment of construction and applying principles depicted in ASHRAE, LEED and BREEAM guidelines.

## MANAGEMENT AND OVERSIGHT

### AUDITS AND SUPPLIER OPERATING EFFECTIVENESS

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 additionally reserves the right to conduct audits to assess Supplier's compliance with this Supplier Code of Conduct. Suppliers are expected to facilitate these audits by providing access to relevant facilities, records, and information. The purpose of these audits is to evaluate operational effectiveness and ensure adherence to the stipulated standards and practices.

### TRAINING AND COMPLIANCE WITH THE SUPPLIER CODE OF CONDUCT

Suppliers must provide comprehensive training to their employees on the principles and requirements outlined in this Code of Conduct. Regular training sessions should be conducted to ensure ongoing compliance. The Company expects evidence of training programs and compliance monitoring to uphold the stipulated standards. 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 when a situation develops that causes the Supplier to be in violation of this Supplier Code of Conduct.

## REPORTING AND INVESTIGATIONS

Suppliers must promptly report any suspected or confirmed breaches of this Code of Conduct to the Company through the Digital Ethics Action Line at <https://digitalrealty.ethicspoint.com>. The Company will address any reports in compliance with applicable laws, and when appropriate, the Company shall conduct thorough investigations regarding reported conduct. Suppliers are expected to fully cooperate in these investigations to determine the extent of non-compliance and provide access to any information reasonably requested by the Company or its representative. Failure to do so will be a breach of this Supplier Code of Conduct.

Where remediation is required, the Supplier will be expected to inform the Company and implement a corrective action plan and timeline to resolve the failure effectively and promptly.

## 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.

*Revised February 14, 2024*