

————— **ESG REPORT 2020** —————
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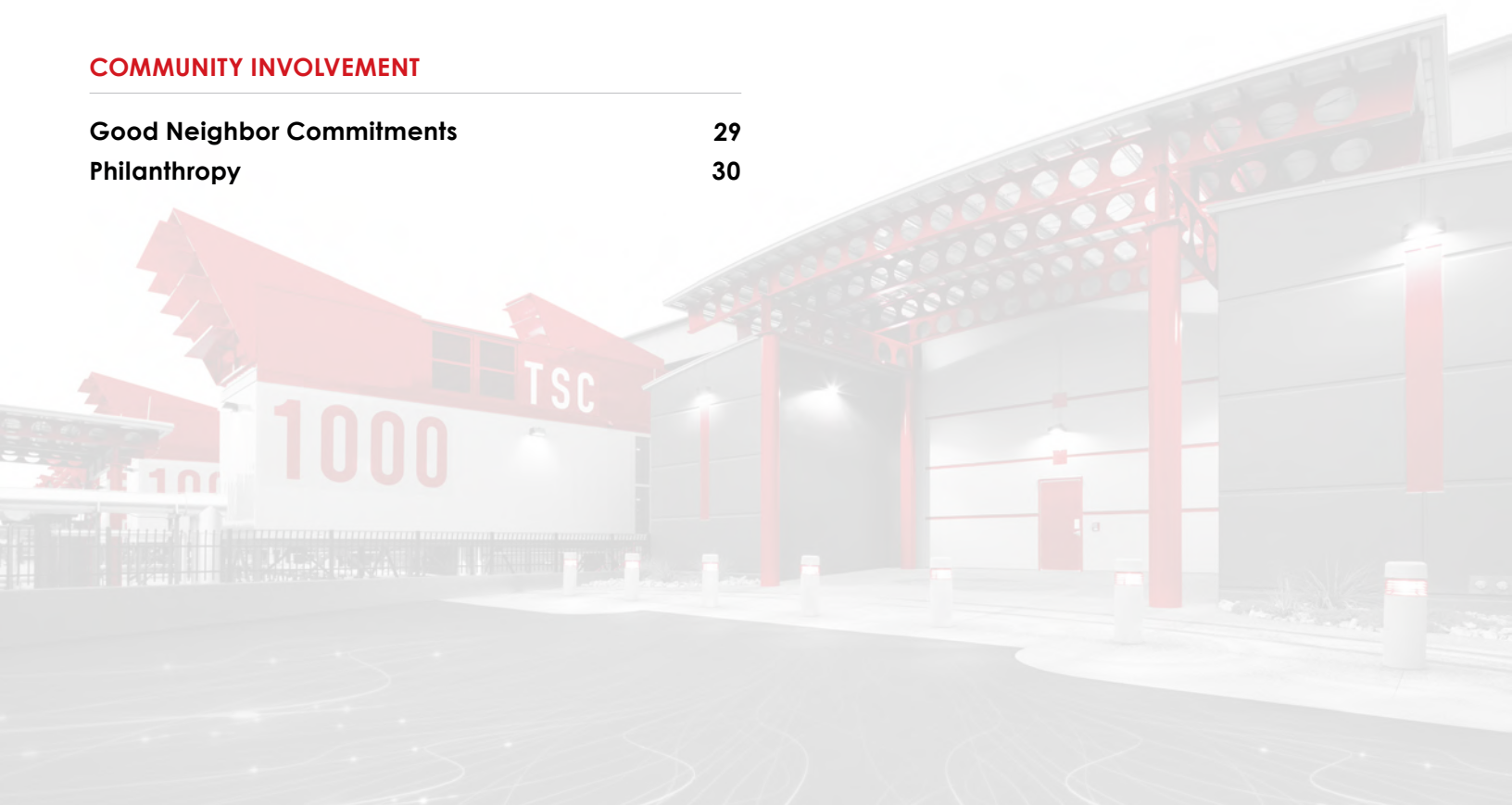
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A black and white photograph taken from a low angle, looking up at a modern skyscraper. The building is framed by a complex network of dark, intersecting lines that form a grid-like structure, likely part of a glass and steel framework or a bridge. The sky is visible in the background, filled with soft, white clouds. The overall composition creates a sense of height and architectural complexity.

CORPORATE GOVERNANCE



Guidelines

Switch has adopted Corporate Governance Guidelines consistent with the requirements of the New York Stock Exchange ("NYSE") covering, among other things, the duties and responsibilities of our directors and independence standards applicable to our Board committee structures and responsibilities. These guidelines are available on the "Governance" section of our [Investor Relations](#) website.

Board Composition and Qualification Standards

Switch currently has eight Board members, including six independent directors. Pursuant to our Bylaws, the total number of directors shall not be less than one nor more than 15. Each director is nominated for a one-year term, and holds office until his or her successor is duly elected and qualified, or until the earlier of such director's death, retirement, disqualification, resignation or removal.

When considering whether directors and nominees have the experience, qualifications, attributes or skills, taken as a whole, to enable the Board to satisfy its oversight responsibilities effectively in light of our business and structure, the Nominating and Corporate Governance Committee and the Board evaluate each individual in the context of the Board as a whole. The objective is to assemble a team that can best perpetuate the success of the business and represent stockholder interests through the exercise of sound judgment using its diversity of experience, thought, backgrounds and cultures. When considering director candidates, the Nominating and Corporate Governance Committee and the Board evaluate them in accordance with the qualification standards and additional selection criteria set forth in Attachment A to the [Corporate Governance Guidelines](#).

Diversity Policy and Additional Selection Criteria

Diversity of race, ethnicity, gender, age, cultural background or professional experience is among the qualification standards as the Board believes that having a diverse Board promotes inclusiveness and enhances the Board's deliberations. The Board is dedicated to maintaining a Board with a broad scope of experience, expertise, and perspectives to promote the consideration of differentiated viewpoints, address Switch's evolving strategic needs, and strengthen its competitive position. Accordingly, the Nominating and Corporate Governance Committee is committed to achieving and maintaining diversity among Board members, and with respect to any director position to be filled by a new candidate, the Nominating and Corporate Governance Committee will ensure that candidates of diverse backgrounds are considered as part of the search process. Currently, the Switch Board includes three female directors, representing half of our independent directors.

For additional information on Switch policies regarding Board Structure, Shareholder Rights, Voting Provisions, Executive Compensation, Risk Oversight, and Independent Public Accounting Firm please reference our latest **Proxy Filing**.

For information on Stakeholder Governance policies, please follow the provided links to related sections within our **ESG web portal**.

- **Lobbying and Political Expenses**
- **Bribery & Corruption**
- **Whistleblower Programs**
- **Diversity Program**
- **Environmental Policy Statement**
- **GHG Reduction and Environmental Procurement Policy**

Executive Officers

Rob Roy – Founder, Chairman, and Chief Executive Officer (20 years)

Mr. Roy is our Founder and has served as our Chief Executive Officer and as our Board Chairman since Switch, Inc.'s formation in 2017. Mr. Roy also served as Chief Executive Officer and as Board Chairman of Switch, Ltd. from 2003 until the closing of our initial public offering in October 2017. Mr. Roy first began developing data center facilities in 2000. He merged several predecessor companies he founded into Switch, Ltd. We believe that Mr. Roy is qualified to serve as a member of our Board based on the perspective and experience he brings as our Founder, Chief Executive Officer and Chairman as well as his widely recognized technological leadership in the data center industry.

Melissa Young – Chief Information Officer (15 years)

Ms. Young has served as our Chief Information Officer since our formation and has served as Chief Information Officer of Switch, Ltd. since August 2017. Since joining Switch, Ltd. in 2005, Ms. Young has served in various roles with increasing responsibility, including Executive Vice President of Corporate Development, Executive Vice President of Sales, Executive Vice President of Colocation, and Director of Customer Engineering.

Teresa Borden – Chief Construction Officer (13 years)

Ms. Borden has served as our Chief Construction Officer since our formation and has served as Chief Construction Officer of Switch, Ltd. since August 2017. Since joining Switch, Ltd. in 2007, Ms. Borden has served in various roles with increasing responsibility, including Executive Vice President of Operations and Executive Vice President of Construction.

Thomas Morton – President and Chief Legal Officer (12 years)

Mr. Morton has served as President and Chief Legal Officer of Switch, Inc. since its formation. Mr. Morton served as President of Switch, Ltd. since January 2016 and as General Counsel of Switch, Ltd. since April 2008. Mr. Morton previously served as Chief Financial Officer of Switch, Ltd. from February 2014 until January 2016. Prior to joining Switch, Ltd., Mr. Morton was an attorney with Pillsbury Winthrop Shaw Pittman LLP from 2004 until 2008 and an attorney with Gray Cary (now DLA Piper) from 1999 until 2004. Mr. Morton received a B.A., Finance from the University of San Diego and a JD from the University of the Pacific – McGeorge School of Law.

Gabe Nacht – Chief Financial Officer (5 years)

Mr. Nacht has served as Chief Financial Officer of Switch, Inc. since its formation and has served as Chief Financial Officer of Switch, Ltd. since January 2016. Prior to joining Switch, Mr. Nacht served as Chief Financial Officer of ClearCapital.com, Inc., a real estate valuations, data, analytics and technology company, from September 2011 to July 2015. He previously served as Chief Financial Officer for Meridian Systems, Inc., Bustos Media, Inc. and Z-Spanish Media, Inc.

To read more about the Switch leadership team, please [click here](#).

Directors**Rob Roy – Chairman**

Mr. Roy is our Founder and has served as our Chief Executive Officer and as our Board Chairman since Switch, Inc.'s formation in 2017. Mr. Roy also served as Chief Executive Officer and as Board Chairman of Switch, Ltd. from 2003 until the closing of our initial public offering in October 2017. Mr. Roy first began developing data center facilities in 2000. He merged several predecessor companies he founded into Switch, Ltd. We believe that Mr. Roy is qualified to serve as a member of our Board based on the perspective and experience he brings as our Founder, Chief Executive Officer and Chairman as well as his widely recognized technological leadership in the data center industry.

Donald Snyder – Lead Independent Director, Nominating and Corporate Governance Committee Chair

Mr. Snyder is the lead independent director of the Switch Board of Directors, having served on our Board since our formation and served as a member of our Predecessor Board from 2006 until the closing of our initial public offering. Mr. Snyder has extensive, executive level experience involving risk management in the Finance and Gaming industries. His professional career began with 22 years at First Interstate Bancorp (now Wells Fargo), culminating as Chairman and Chief Executive Officer of the bank's affiliate in Nevada; where he held discretion and oversight of the bank's risk management practices. He moved to the casino hospitality industry, becoming a director and the president of publicly held Boyd Gaming Corporation, where he also had oversight responsibilities of the firm's risk management practices. Mr. Snyder's tenure at Boyd gaming spanned from 1997 until his retirement in 2005 to pursue interests in community building and public service. Following service from 2010 as dean of the Harrah College of Hospitality at the University of Nevada, Las Vegas ("UNLV"), Mr. Snyder served as Acting President of UNLV in 2014. Subsequently, he served as Presidential Advisor at UNLV for three years from January 2015. Mr. Snyder serves as a director, chair of the Governance Committee, and member of the Risk Committee of Western Alliance Bancorporation, a publicly held commercial bank holding company. Mr. Snyder served as a director of Tutor Perini Corporation, a publicly held construction company, from September 2008 to May 2019. He has served as a director on several public and private company boards, numerous non-profit entities, and several state and local public sector commissions and committees over the past 25 years. His non-corporate service includes The Smith Center for the Performing Arts (Chairman), the Nathan Adelson Hospice (past Chairman), UNLV Foundation (past Chairman), and the Regional Transportation Commission's Transportation Resource Advisory Committee (Chairman). Mr. Snyder holds a Bachelor of Science in Business Administration from the University of Wyoming and completed the Graduate School of Credit & Financial Management at Stanford University. We believe Mr. Snyder is qualified to serve as a member of our Board based on his

understanding of our business, history and organization, as well as his leadership skills, his extensive service on public company boards and related committees, banking and regulatory expertise, and risk management expertise.

Kimberly Sheehy – Audit Committee Chair

Ms. Sheehy has served as a member of our Board since December 2017. Since May 2019, Ms. Sheehy has served as Chief Financial Officer of ResMan, a privately-owned software company providing software solutions to multi-family residential property managers. As an independent director, she currently chairs the Switch Audit Committee and also serves on the Compensation Committee. Ms. Sheehy served as Chief Financial Officer of Lori's Gifts Inc., a privately-owned retail company serving hospitals throughout the United States, from March 2018 through April 2019. Ms. Sheehy previously served as Chief Financial Officer of StackPath LLC, provider of web services platform for security, speed and scale, from December 2015 through October 2017. Prior to joining StackPath, Ms. Sheehy served as Chief Financial & Administrative Officer of CyrusOne Inc., a real estate investment trust that invests in data centers, from November 2012 through September 2015. Prior to that, she held various roles between 1996 and 2012 at Cincinnati Bell Inc., including Treasurer and Vice President of Investor Relations from March 2011 through November 2012, Vice President of Finance and Treasurer from 2007 to 2011, and prior to 2007, she held positions including Vice President of Financial Planning and Analysis, and Managing Director of Corporate Tax. Prior to joining Cincinnati Bell Inc., Ms. Sheehy held accounting and tax positions at Ernst & Young. Ms. Sheehy received her Bachelor's Degree in Accounting from the University of Cincinnati and holds her Certified Public Accounting license in the state of Ohio. We believe Ms. Sheehy is qualified to serve as a member of our Board based on her extensive executive finance and accounting expertise with publicly held companies and her familiarity with data center and related data technology industries.

Bryan Wolf – Compensation Committee Chair

Mr. Wolf has served as a member of our Board since our formation and served as a member of Switch, Ltd.'s Board from January 2014 until the closing of our initial public offering. As an independent director, Mr. Wolf currently chairs the Switch Compensation Committee and also serves on the Audit Committee. From 1997 until his retirement in January 2019, Mr. Wolf served in various roles at Intel Capital, a division of Intel Corporation ("Intel") that manages venture capital and investments, and served as a Managing Director from 2007. From March 2014 until his retirement, Mr. Wolf also served as Vice President of Intel. Mr. Wolf holds a Bachelor of Science degree in Political Science from the University of Oregon and an M.B.A. from the University of Pennsylvania's Wharton School. We believe Mr. Wolf is qualified to serve as a member of our Board based on his service on the boards of numerous other high growth technology companies, his familiarity with data center and related technology industries and his familiarity with Switch.

Angela Archon

Ms. Archon has served as a member of our Board since November 2020. Ms. Archon served as Vice President, Operations, in the Watson Health business unit of International Business Machines Corporation ("IBM"), a provider of business and information technology products and services, from October 2016 until her retirement from IBM in March 2018. Prior to serving as Vice President, Operations, Ms. Archon served as Vice President, Transformation and Chief Operating Officer with IBM Watson Health from February 2015 to October 2016. Previously, Ms. Archon served as Vice President, Corporate Strategy from May 2013 to February 2015, and Vice President of Worldwide Client Care, Systems & Technology Group, from August 2010 to May 2013. She also served in a variety of other

executive roles with IBM, including Vice President of Intellectual Property Licensing and Business Development, Systems & Technology Group; Director of Global Sourcing Procurement – Enterprise Services; and Director of Global Services Procurement – Strategy, Operations & Alliances. Ms. Archon served as a director of H&R Block, a publicly held tax and financial services company, from March 2016 to September 2020. Ms. Archon currently serves on the Board of Stewardship Trustees of CommonSpirit Health (since July 2020) and the Chemical Engineering Advisory Board at the University of Texas at Austin (since March 2016). Ms. Archon holds two degrees from the University of Texas at Austin, a Bachelor of Science degree in Chemical Engineering and a Master of Science degree in Systems Engineering.

Liane Pelletier

Ms. Pelletier has served as a member of our Board since November 2020. Ms. Pelletier has served as an independent director since 2011. From 2003 through 2011, Ms. Pelletier was the Chairwoman, Chief Executive Officer, and President of Alaska Communications Systems, an Alaska-based telecommunications and information technology services provider. Prior to this, Ms. Pelletier held a number of executive positions at Sprint Corporation, a telecommunications company. Ms. Pelletier currently serves on the board of directors at Expeditors International of Washington, Inc., a global logistics company (since May 2013), Frontdoor, Inc., a home services business (since September 2018), and ATN International, Inc., a holding company with investments in telecommunication companies (since June 2012). In 2017, she earned a professional certificate in cyber security from Carnegie Mellon's Software Engineering Institute/NACD. Ms. Pelletier earned her B.A. in Economics from Wellesley College and an M.S. from the Sloan School of Business at the Massachusetts Institute of Technology.

Zareh Sarrafian

Mr. Sarrafian has served as a member of our Board since our formation and served as a member of Switch, Ltd.'s Board from January 2017 until the closing of our initial public offering. As an independent director, Mr. Sarrafian currently serves on the Switch Audit and Nominating and Corporate Governance Committees. He has served as the Chief Executive Officer of Riverside University Health System since October 2014. Prior to that, Mr. Sarrafian served as Chief Administrative Officer at Loma Linda Medical Center in Loma Linda, California from 1998 to 2014. Since December 2019, he has served as a member of the board of trustees of Loma Linda University Health. Since January 2016, he has also served as a member of the board of directors of Pacific Premier Bancorp, Inc., or Pacific Premier, a publicly held commercial bank holding company, where he currently chairs the Governance Committee and is a member of the Audit Committee. He is also a member of the board of directors of Pacific Premier's banking subsidiary, Pacific Premier Bank. He previously served as a director of Security Nevada Bancorp and its banking subsidiary Security Bank of Nevada until they were acquired by Pacific Premier. He also serves or has served on a number of not-for-profit and higher education boards. Mr. Sarrafian received his Bachelor of Science from California State Polytechnic University, Pomona, and his M.B.A. from California State University, San Bernardino. We believe Mr. Sarrafian is qualified to serve as a member of our Board based on his extensive executive leadership experience, his experience with regulated entities which are a significant portion of our customer base, his service as a board member of publicly held companies and his banking experience.

Tom Thomas

Mr. Thomas has served as a member of our Board since our formation and served as a member of Switch, Ltd.'s Board from 2004 until the closing of our initial public offering. Mr. Thomas held various executive positions with

Valley Bank of Nevada until its merger with Bank of America in 1992. Mr. Thomas held various executive positions with Valley Bank of Nevada until its merger with Bank of America in 1992. After the merger and since 1992 he has served as a managing partner of Thomas & Mack Co., an investment management and commercial real estate development company with properties and developments in Nevada, California, Arizona and Utah. He has also served as a director of Southwest Gas Holdings, Inc., a publicly held energy and construction company since 2008, where he is a member of the Audit Committee and Nominating and Corporate Governance Committee. Mr. Thomas is actively involved in numerous charitable organizations including the Opportunity Village Foundation, the UNLV Foundation Advisory Board, the Las Vegas Rotary Club and the President's Leadership Council at Brigham Young University. He is a member of the Nevada Bar Association and was instrumental in establishing the Thomas & Mack Legal Clinic and Moot Court Facility at the UNLV Boyd School of Law. Mr. Thomas holds a degree in Finance and a J.D. from the University of Utah. We believe Mr. Thomas is qualified to serve as a member of our Board based on his banking and business experience, his extensive service on public company boards and related committees, his experience with charitable organizations and his familiarity with influencers in our key data center markets.

Committees

We currently have three standing committees: an Audit Committee, a Compensation Committee and a Nominating and Corporate Governance Committee. From time to time, the Board may form a new committee or disband a current committee, depending on the circumstances. The charters of all three of our standing Board committees are available on our Investor Relations website under the "Governance — **Governance Documents**" section.

Audit Committee

Switch has a standing Audit Committee, which consists of Ms. Sheehy and Messrs. Wolf and Sarrafian, with Ms. Sheehy serving as chair. Our Board has determined that each of these directors is independent as defined by the applicable rules of the NYSE and the heightened independence standards for members of an audit committee required by the Securities and Exchange Commission (the "SEC"), and that each member of the Audit Committee meets the financial literacy and experience requirements of the applicable SEC and NYSE rules. In addition, our Board has determined that each member of the Audit Committee is an "audit

committee financial expert" as defined by the SEC. None of the Audit Committee members currently serve on the Audit Committee of any other public company. Click [here](#) for the Audit Committee Charter.

Nominating and Corporate Governance Committee

Switch has a standing Nominating and Corporate Governance Committee, which consists of Mses. Archon and Pelletier and Messrs. Sarrafian and Snyder, with Mr. Snyder serving as chair. Our Board has determined that each of these directors is independent as defined by the applicable rules of the NYSE. Click [here](#) for the Nominating and Corporate Governance Committee Charter.

Compensation Committee

Switch has a standing Compensation Committee, which consists of Ms. Sheehy and Messrs. Snyder and Wolf, with Mr. Wolf serving as chair. Our Board has determined that each of these directors is independent as defined by the applicable rules of the NYSE. Click [here](#) for the Compensation Committee Charter.

ENVIRONMENTAL POLICIES & INITIATIVES



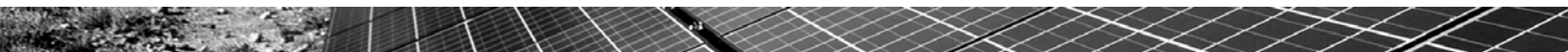
Sustainability

As a leading technology infrastructure and data center colocation provider, Switch's most important opportunity to impact global climate change is to reduce the impacts associated with the electricity used to power our data centers. Switch has been tirelessly committed to powering its data centers with 100% renewable power. Since January, 2016, all Switch data centers have run on 100% renewable energy in all of our Prime Campus locations.

At Switch, we pride ourselves on our commitment to sustainability and it is our corporate policy to purchase all "green" or 100% recycled items where available. This policy includes the recycling of business waste through a series of recycling programs. Some of these include but are not limited to the following:



-
- All employees are provided with reusable recycled bottles that can be filled from Switch provided water filtration stations in our workplaces
 - All employees are given a Switch cinch bag made from recycled material
 - Water bottles provided for onsite client visits are made from 100% recycled materials
 - Switch "SWAG store" items are packaged in 100% recycled plastic
 - Recycling containers are provided throughout our offices and data center facilities for the disposal of all recyclable waste
 - All offices have shred bins for paper which is then destroyed and recycled by a 3rd party service provider
 - We recycle all scrap wire and metal from our construction sites
 - Our facilities exclusively use energy-efficient LED lighting
 - 100% of used UPS/Generator batteries are recycled through a 3rd party battery recycling company
 - Electronic waste is recycled through a 3rd party recycling company
-





Water Conservation and Water Recycling

Switch's proprietary water processing technology allows Switch to reuse its water, eliminates chemicals from its cooling systems and increases efficiency 400%; generating savings of more than 155 gallons of water in just the past three years.

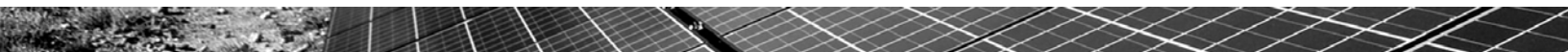
Switch is leading the development of a 4000-acre-foot effluent water pipeline in Northern Nevada, scheduled for completion in 2022, allowing the company to run its Citadel data center campus on 100% recycled/effluent water.

Customer Eco-Efficiency Program and Transparency

Switch's customers place their compute, server, and storage equipment into Switch's data centers, and thereafter manage and operate their own equipment. Switch has little influence over the environmental profile of these customers' deployments but make it a priority to provide our customers with all the data and access they need to manage their own energy use. Through a Switch "Living Data Center" portal, customers have access to both real-time and historical energy use, by server and by rack, inside Switch data centers. Therefore, any customer can optimize their code, their equipment, and their data processing requests so as to minimize energy use should they choose to focus in this arena. Customers can also access accurate energy use data for transparency and reporting purposes and can carefully and accurately determine their own carbon foot print and quantify how Switch's 100% green energy utilization helps them meet their own carbon reduction goals.

Switch provides its clients with a Sustainability Certificate for using 100% Renewable Energy within the Switch ecosystem. This certificate demonstrates that Switch has retired Renewable Energy Credits (RECs) on behalf of our clients, enabling them to designate their energy consumption from any Switch data center as 100% renewable. These RECs comply with Greenpeace's principles of locality, additionality, and sustainability; and were generated by Nevada solar farms in 2019. Click [here](#) for more information on Switch's sustainability initiatives.

For sustainability press releases issued with our clients please [click here](#) or [here](#).



Awards and Recognition for Energy Efficiency

Switch has received the following third-party awards and recognition for its energy efficiency initiatives:



- 2019 EPA Green Power Leadership Award: The agency's annual awards recognize America's leading green power users for their commitment and contribution to helping advance the development of the nation's voluntary green power market. EPA presented Switch with an **Excellence in Green Power Use Award** in September, 2019.

GREENPEACE

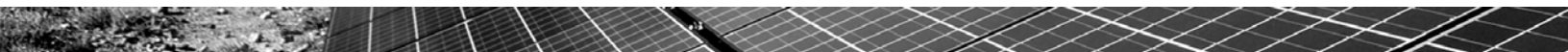
- Greenpeace Clicking Clean Report: Switch became the world's first multi-tenant data center operator to receive all "A" grades in sustainability from Greenpeace in its **2017 Clicking Clean Report**. As the only company in its class to achieve a 100% clean energy index score, Switch was recognized as the **"definitive leader among colocation operators for its efforts to transition its data center fleet to renewables as fast as possible through a combination of renewable energy procurement and aggressive advocacy"**.

Environmental Policy Statement

Switch reveres the principles of additionality, locality, sustainability, advocacy, and compassionate stewardship in its power procurement, use and operations. Switch is committed to the highest standards of environmental performance and sustainable design in all of our data centers and in the general course of day-to-day business and to improving the company's performance over time. Sustainability is central to our business philosophy, and is the guiding principal to our data center designs and operations. Our founder and CEO has more than **500 patents and patent pending claims** that not only help us deliver 100% uptime for our clients, but are equally focused on energy efficiency and sustainability innovation.

Switch's sustainability sitting policy includes unyielding commitments to:

- Operate our facilities with 100% renewable electricity, and to implement policies and practices that further ensure we are proactive and responsible stewards of the climate and the environment, preventing harmful emissions whenever possible
- Strive for optimal energy efficiency and tenets of sustainability in the design of our data center facilities; with a level of leadership and innovation that enables us to perform well above industry standards and invite others to do the same



- Seek higher levels of performance, efficiency and optimize with each new facility we build
- Be transparent and open in our communications about our efforts
- Comply with all environmental laws and regulations as applicable to our business, including design, construction and building permits; and advocate for advancements in such policies and standards
- Advocate for and participate in public policy and industry standards debate to help raise awareness, and champion sustainable initiatives and challenge the industry status quo

Switch leads these initiatives from the top. Under the direction and vision of our CEO, Switch's EVP of Strategy and EVP of Policy develop the programs and practices we implement in support of sustainability. Team members within the Strategy and Policy departments contribute to these initiatives on a day-to-day basis, and all Switch employees support our company posture to operate as green as possible. Switch's CEO reviews strategic sustainability plans and overall progress on a regular basis with sustainability of the planet as a constant priority for Switch.

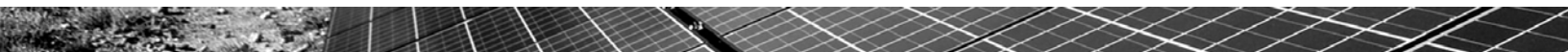
To review the formal policy, [click here](#).

Environmental Procurement Policy

As a global leader in sustainable data center design and operations, and viewed as a thought leader for corporate citizenship, Switch is committed to procuring goods and services in a manner that enhances the sustainability profiles of our data centers and our operations. We implement this commitment by working collaboratively with suppliers of our most important and impactful commodities to ensure our purchases meet the highest environmental performance standards, as required by our industry-leading specifications. This includes, but is not limited to, commodities such as energy, water, air handlers, lighting, roofing, and building sensors. **Switch's CEO and founder Rob Roy says "data runs the planet® and we want to ensure it doesn't ruin the planet."**

Switch's efficiency technologies require seamless construction efforts often involving land management, and performance oversight. Switch is very selective when identifying and managing the suppliers involved in its construction efforts. Building a new data center is a large, complex construction effort involving land management, multi-year planning, and careful management and oversight of contractor performance to maintain design and operational integrity for the infrastructure that power the digital world.

Switch's Chief Construction Officer leads the performance of construction suppliers across the company - with the oversight of Switch's Inventor, Founder and CEO Rob Roy. The construction team procures and selects firms to complete all phases of data center construction. Contracts with these suppliers include legally binding requirements to comply with Switch's rigorous development standards, permit conditions, and land use authority rules, and above all to protect Switch's and its clients' confidential information and trade secrets. All contractor



performance is monitored by a licensed third-party inspection, testing and management agency at each Prime Campus location. Additionally, the third-party agency is managed by our internal certified Qualified Compliance Inspector of Stormwater and Preparer of Storm Water Pollution Prevention Plans. Inspections are conducted on a weekly basis unless an unexpected event occurs that requires an inspection to be conducted sooner to stay in accordance with any and all local, County, State and/or Federal requirements. If suppliers were to breach their obligations they would be promptly notified and managed through appropriate contractual, monetary, or legal actions should the case arise. This includes setting deadlines for remedial actions or improvements, as possible.

GHG Reduction Program

Switch prepares a detailed greenhouse gas inventory each year, and publishes the results on the sustainability section of our [corporate website](#). The scope of our review includes all direct (Scope 1) and indirect (Scope 2) emission sources, as defined by the GHG Protocol Corporate Accounting & Reporting Standard. The GHG Protocol is the most widely used tool for quantifying GHG emissions and has been adopted throughout the world.

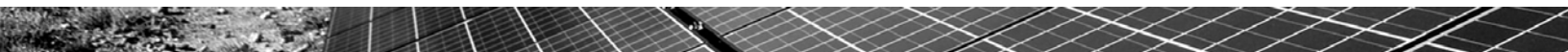
The boundary of the inventory extends to all assets under Switch's operational control. Generally, emissions calculations are based upon quantitative data sources such as purchase records, metering equipment, and service records. Emission sources include our electricity supply (both location-based and market-based emissions are reported), renewable energy purchases and retirements, onsite diesel combustion for backup generation, relevant refrigerants used in our cooling systems, and motor vehicles used in support of site operations.

Switch's primary focus in reducing its greenhouse gas emissions is to ensure all data centers remain 100% renewably power – even as the company grows. In 2019, greenhouse gas emissions from Switch's electricity use would have represented more than 98% of its greenhouse gas footprint had the company not committed to renewable energy. Switch's 2019 greenhouse gas footprint from all other in-scope sources totals just over 5300 metric tons.

Switch is committed to reducing its footprint from minor sources. For example, Switch has improved its inventory and record-keeping processes for coolant management and minimizes the use of its diesel generators.

GHG Risk Management Program

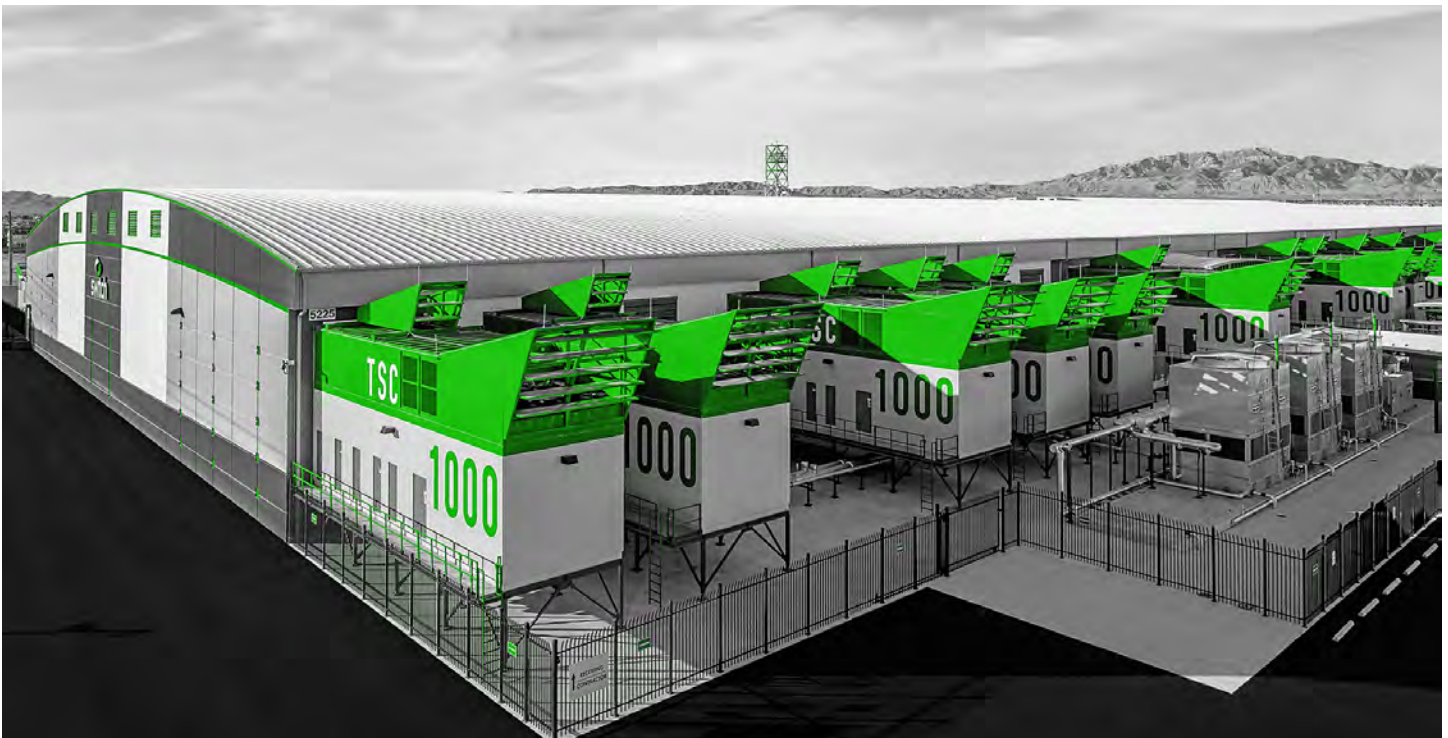
Since Switch's founding in the early 2000s, the risks of climate change and the need to create a low-carbon economy have influenced the company's strategy and operations. With this in mind, the transition to a digital/low-carbon economy presents little systemic risk to Switch's business and Switch has often positioned our self as a catalyst helping to bring about a low-carbon economy sooner as opposed to later.



Switch's primary risk exposure from the transition to a low-carbon economy comes from changes to electricity markets and prices which may result from modifications to the electricity regulatory environment, direct regulation of carbon emissions, or other factors. Switch actively monitors these variables including as the founder member of the Smart Energy Alliance in Nevada. Switch anticipates its customers and potential customers will likely become increasingly desirous to seek low-carbon suppliers across their supply chains.

For these and other reasons, it is Switch's policy that its data centers be powered by 100% renewable energy from their first day in operation. Since 2016 Switch has supplied its operations exclusively with 100% renewable power, including establishing long-term contracts with energy generators and electricity suppliers for renewable power. The transition to low-carbon energy sources across the grid, and the increasing demand for low-carbon operations from customers, will affect Switch less than they will affect similarly energy-intensive businesses that have not already built renewable energy into their supply practices. For Switch, low-carbon energy is business-as-usual.

Switch's management of the climate-related aspects of its electricity supply are actively managed by the company's senior leadership. Switch Founder and CEO Rob Roy leads and is responsible for Switch's sustainability profile with hands-on oversight. Rob Roy has designed and patented energy efficiency innovations deployed throughout the company's data centers, and actively manages the company's sustainability progress, from electricity contracts to data center siting decisions.



Physical Climate Risk Management Program

As a data center provider, managing any risks within our ability to operate is fundamental to Switch's core business. Physical risks related to climate change such as frequent severe weather events, rising sea levels, increased flooding, droughts, consistently higher heat levels, and disruptions to supporting infrastructure such as electrical service due to these events, are managed using Rob Roy's patented designs and through core business processes throughout the company. Examples include:

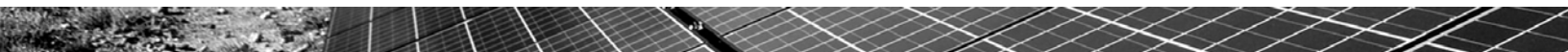
- Switch purpose-builds its data centers to enable full control of building design and construction specifications. Rob Roy's patented design standard includes both simple and highly advanced protections against severe weather events. For example, Switch does not use or permit any equipment to penetrate the repairable/replaceable dual roof system and locations are outside a 100-year flood plain.
- Switch maintains full power backup systems which include redundant utility feeds, full-site battery capacity, and onsite backup generation to recharge the batteries if they are needed over a long period of time. The company has also secured mission-critical status fuel delivery contracts which ensure that Switch's fuel deliveries will take priority over other customers.
- Switch's cooling system design allows the data center to be able to run forever without water and has outside air pollutant detection and protective response capable. All cooling water is located outside the data center building shell (i.e. no water permitted on or above data center floor).
- Switch considers many factors in selecting new data center locations, including the current and future prevalence and risk of adverse impacts from natural disasters, including severe weather events.



For more information please [click here](#).

Since considering and mitigating the risks of extreme events (of all kinds) is a routine responsibility of Switch's planning, operations, and executive teams, specialized reporting and management of climate change risks, as a category, would be unproductive and is unnecessary. Physical threats to the data center from all foreseeable causes are routinely planned for, drilled, and managed. Switch's Founder and CEO Rob Roy oversees the company's facility design and construction alongside Switch's Chief Construction Officer, who continually works to develop and implement data center design improvements and advances in equipment, systems and processes to create the most advanced data center ecosystem in the world.

Switch maintains a library of additional policies and procedures to ensure its services are Tier 5 Platinum compliant and meet Switch's aggressive sustainability standards. Switch secures these policies on site, to avoid the security risks of espionage, terrorism, sabotage, and cyber attack, inherent in unauthorized duplication, proliferation, or exploitation of these policies. If you would like additional detail or an on-site tour of Switch's facilities to inspect these policies, please contact the Investor Relations Team (investorrelations@switch.com) or the Switch Policy team (policy@switch.com).





HUMAN CAPITAL

Talent Recruitment

Switch recognizes that our team members are our greatest asset. As Switch continues the pursuit of designing, building and operating the world's most advanced data centers and leading through innovation in technology infrastructure, we know that our continued success depends on the sustained contributions of bright, energetic, talented people who share our mission-critical mindset. Our recruitment and hiring efforts result in a diverse workforce mirroring the communities in which Switch does business.

STEAM Education Workforce Pipeline Development

At Switch, we understand that recruiting talent for the technology industry has to start at an early age. According to the World Economic Forum “sixty-five percent of children entering primary school will end up in jobs that don't yet exist.” That is why Switch is building a workforce pipeline aimed at attracting some of the youngest, brightest minds. We achieve this through partnerships with STEAM-based organizations like the For Inspiration and Recognition of Science and Technology Organization (**FIRST Robotics**), Code.org, ArtPrize and Green Our Planet. Switch is a large proponent of STEAM education because we fundamentally believe it is what will inspire the next generation of technology leaders. We choose to partner with these organizations because they align with our mission of supporting and promoting STEAM education throughout the world.

One of the STEAM-based organizations that Switch regularly supports, FIRST, is a non-profit organization inspiring K-12 student to become science and technology leaders by engaging them in exciting mentor-based programs that build science, engineering, and technology skills. FIRST fosters innovation skills and well-rounded life capabilities including self-confidence, communication, and leadership among students. Not only does Switch provide funding for various programs throughout the organization, but many of our own team members get involved through mentorship and volunteer opportunities.

Switch is a primary sponsor of FIRST robotics regional competitions in our Prime locations: Las Vegas, Tahoe Reno, Atlanta and Grand Rapids.



Higher Education Partnerships

Switch has partnered with universities and community colleges to develop curriculum and to setup a workforce development pipeline to meet the future demands of specialty careers in technology throughout Nevada.





University of Nevada, Las Vegas (UNLV)

Switch hosts the Intel Cherry Creek Supercomputer for UNLV at its Core Campus in Las Vegas and donated a private high-speed optical fiber connection to the UNLV campus, providing researchers access to world-class computing power and enabling UNLV to be the most connected University in the nation. Cherry Creek Supercomputer was ranked among the top 500 supercomputers and the 41st most energy efficient computer in the "Green 500" rankings. UNLV will have the opportunity to acquire new research grants and top faculty members as the computer helps to advance fields including genomics and bioinformatics, medical and climate research, molecular modeling and data analytics. The supercomputer enables UNLV to be on par with top-tier research universities nationwide and helps them to further their efforts toward becoming a Tier 1 Research University.



University of Nevada, Reno

University of Nevada, Reno (UNR)

Switch provided an in-kind donation to UNR for 5-years of critical infrastructure support including space, power, data storage and security for UNR's new high-performance computing cluster, that offers 30 times more computing power. The cluster hosts programs to commercialize stationary robotic and advanced manufacturing systems, unmanned aerial vehicles, driverless cars, and underwater robots. It will be used for research that will include artificial intelligence, robotics, and computational biology. Click [here](#) for more information.



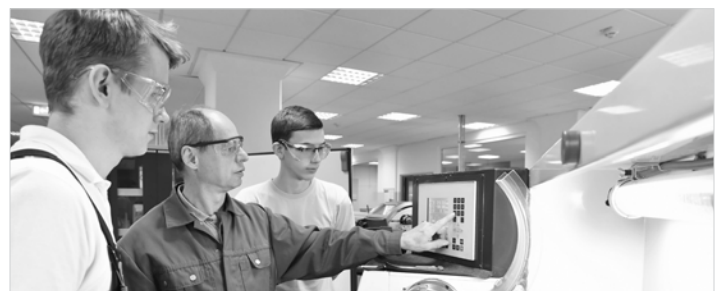
College of Southern Nevada (CSN)

Switch partnered with CSN to create an Associate of Applied Science Degree in Air Conditioning Systems-Critical Systems to prepare students for employment in technical, high-wage and high-demand fields. To date, hundreds of students have majored in Critical Systems at CSN. 100% of those who have gone through the program and interned with Switch have been hired.



Truckee Meadows Community College of Southern Nevada (TMCC)

Switch partnered with TMCC to create an Air Conditioning Systems- Critical Systems degree. Also, Switch donated equipment to Truckee Meadows Community College to the training program for data center engineering technicians in anticipation of the workforce demands due to Switch's Citadel Campus in Tahoe Reno. Graduates will be trained in operations and maintenance of commercial heating and cooling systems. Switch donated a cooling tower to the program so that students can work on the same equipment in the lab as they would work on at Switch and will provide training to TMCC faculty.



Talent Development

Technical, Safety & Professional Development Training

Promising 100% uptime is one thing; having a talented group of committed team members delivering consistent excellence for 20 years is what makes Switch an undisputed leader in the data center industry. To stay at the forefront of our industry, we recognize that it is critical to invest in our people. That's why we provide our team members comprehensive technical, safety, and professional development training.

Client Support Team

Switch team members come from a diverse range of professional backgrounds, so providing technical training for working in a mission-critical data center environment is a necessity. Many operational departments even have their own dedicated training organizations to analyze, develop, and implement role-specific and other technical training that meets the ever-evolving needs of our critical personnel. The Client Support team, the nucleus of our operations, commits 90 days to training new hires on internal communication standards, data privacy, and using Living Data Center, our proprietary data center infrastructure management system. The Data Center Operations team also dedicates 90 days to training new technicians to thrive in Switch's critical power and cooling environment. Security Operations has a training team who has developed and facilitates a week-long Security Academy for each new Security Officer.

Safety Training

It is critical that our teams not only perform their jobs competently, but safely. Switch provides role-based safety training including, but not limited to, CPR/AED/First Aid, Forklift and material equipment operation, Arc Flash (NFPA 70E), Fire Riser and Extinguisher operation and response, and Ladder and Scaffolding safety. We have taken the time to craft content specific to our organization. Many of our instructors are Switch team members; they know the landscape of Switch better than any external instructor and can acutely recognize what team members need to work safely in a colocation data center environment.

Comprehensive Leadership Programs

In addition to the technical skills vital to day-to-day operations, Switch team members must be equipped with essential skills such as decision making, problem solving, and critical thinking. As our team members develop, so do the roles they undertake. This is why Switch consistently invests in comprehensive leadership programs. We've even hired an in-house leadership development expert to create and facilitate multiple annual leadership training programs specific to the needs of Switch.



New Hire Orientation

The importance of delivering an impactful New Hire Orientation and onboarding experience cannot be understated, as this is the first experience of every Switch team member. That is why we consider and evaluate this experience with the utmost priority. Our incredibly organized and well-executed event sets the bar high for Switch's expectations of our new team members.

Talent Retention Employee Benefits

Medical and dental insurance premiums

At Switch, the health of our team members is critically important. That is why we offer one of the most competitive benefits programs in the industry. Switch covers 100% of medical and dental insurance premiums for all enrolled team members AND their dependents. Switch also offers a competitive 401(k) plan, as well as the option to participate in voluntary supplemental insurance, FSA and vision plans. To view more please visit Switch's [Careers](#) webpage

Meal Program

During any full shift at Switch, team members are able to enjoy meal-related benefits which include complimentary lunch from a variety of restaurants each day as well as a paid lunch break, allowing for team members to remain on site and available. Switch believes in offering this exceptional benefit in support of the mission-critical nature of our business and the commitment to 24/7 availability to our clients.

"Fitness for Life" Gym Reimbursement Program

With optimal health as the driving incentive behind the benefits we offer, Switch has implemented a Fitness for Life Gym Reimbursement program which will refund a significant portion of the cost of an average gym membership on a bi-weekly basis to our team members.

Onsite Medical and Wellness Program

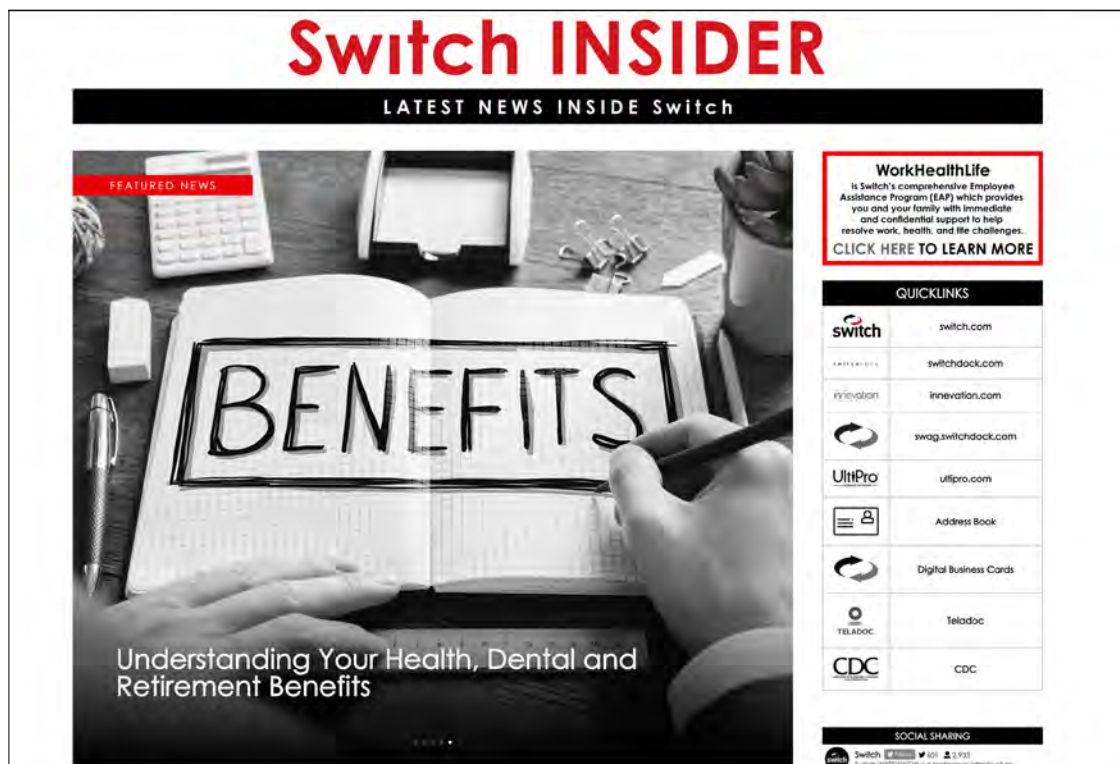
Switch has taken its commitment to physical health to the next level with the addition of our newest department, LIFE MUSE, which is the health and wellness division of Switch under the guidance of Quinn Pauly, MD, FAAFP. This innovative corporate wellness and lifestyle platform incorporates the pillars of health, fitness, recovery, nutrition, meditation and professional development.

Bonuses, Increases and Advancement

Switch also offers the opportunity to earn annual performance-based bonuses, annual pay increases, and encourages upward mobility through merit-based internal promotions.



Team Member Engagement



Switch INSIDER

Switch's internal communications platform, is designed to create inclusiveness by providing real time communication with our staff. With daily updates, it is our goal to keep team members informed, educated and proud of what we are doing as a company. In an effort to further increase team member awareness, the Switch Engagement team also hosts Speaker Series events for all employees on a variety of topics focused on our company's mission. These series are also recorded and live on our company's internal site for those employees that cannot attend in person. Previous topics include, energy & sustainability, sustaining our physical world in a digital age and a look into our digital future.

Appreciation Celebrations

To further show appreciation for our team members, Switch hosts an annual holiday party where every employee receives a technology-forward gift from our CEO and Founder, Rob Roy. Any time a team member welcomes a new child into their family or has a major life event such as a wedding, they are offered an incredibly generous gift card. Many of our departments also hold monthly group birthday celebrations.

Mentorship Programs

FIRST® Robotics

One of the STEAM-based organizations that Switch regularly supports, FIRST, is a non-profit organization inspiring K-12 students to become science and technology leaders by engaging them in exciting mentor-based programs that build science, engineering, and technology skills. FIRST fosters innovation skills and well-rounded life capabilities including self-confidence, communication, and leadership among students. Not only does Switch provide funding for various programs throughout the organization, but many of our own team members get involved through mentorship and volunteer opportunities. The process to volunteer is located on Switch's internal share drive for all employees to access.



Employee Turnover

Switch prides itself on hiring the right people and doing our best to provide the resources, incentives, leadership, and upward mobility to ensure a positive, long-term relationship with our valued employees. Human Resources retains its employee turnover rate and provides a weekly, monthly, and annual departmental headcount report to Finance and the Board of Directors. Over the past five years, our annual employee turnover rate has ranged from 15%-18%. Since 2012, our employee turnover rate has never been above 20% in any single year. Average employee turnover across the Technology industry was approximately 21% according to the 2018 Mercer U.S. Turnover Survey.

Switch has established a strong track record of retention among its senior leadership team; with an average tenure of 9 years within its C-Suite and EVP-level staff, and an average tenure of 7 years for all VP-level and above staff.

Performance Management & Training

Performance Reviews

Switch encourages supervisors and employees to discuss job performance and goals on an informal, day-to-day basis. All Hourly/Non-Exempt Employees, Supervisors and Managers receive an annual performance review. Formal performance reviews may be conducted throughout an employee's introductory assessment period.

and after an initial period of time in any new position, and as needed. Performance reviews provide team members with the opportunity to discuss job tasks, identify areas of improvement, encourage and recognize strengths, and discuss positive, purposeful approaches for meeting goals.

Management Training

All team managers at Switch receive annual training on how to complete performance reviews for their teams; so that team members receiving performance reviews are familiarized with what to expect. Switch has provided various performance management courses on topics including (but not limited to): Enhancing Team Communication, Resolving Conflict, Collaborative Decision Making, and Building on Style Differences.

Switch offers intensive online and workshop-driven curricula and training that holistically develops the talent of our company and the integration with our clients and vendors. In addition, quantitative targets are used in annual performance reviews to track employee progress across various criteria specific to each individual's role, and used by supervisors to set goals and expectations for future employee development.

To ensure our managers and supervisors understand their vital roles as department leaders, Switch provides a comprehensive review of the processes and procedures to effectively navigate the "how to" of Human Resources. These interpersonal tools are the key building blocks leaders will need to effectively lead their teams and continually enhance their people management skills.

Open Feedback Culture

Switch promotes an open feedback culture through the use of our online team member portal. Team members can use this tool to not only submit feedback,

but innovative ideas and challenge/solution scenarios that are reviewed by an internal committee.

Switch is committed to conducting business in accordance with the highest ethical standards. Consistent with those standards, we encourage employees to discuss complaints, suggestions or questions with their supervisor, human resources, or a Switch executive. Employees should utilize this Voluntary Open-Door policy for reports and ideas that are not addressed through the Company's specific reporting procedures.

For times when a team member would like to remain anonymous, we have engaged a third-party contractor to provide all Switch employees with access to a confidential Ethics Hotline.

The Ethics Hotline can be accessed as follows:

Website: www.lighthouse-services.com/switch

Email: reports@lighthouse-services.com

(must identify Switch in the email)

Phone: (844) 440-0097

Fax: (215) 689-3885

(must identify Switch on the cover page)

Switch is committed to providing a work environment free of harassment. As a result, we maintain a strict policy prohibiting sexual harassment and harassment because of race, color, sex, national origin, religion, disability, sexual orientation, age or any other basis protected by federal, state or local law. All such harassment is prohibited. Our anti-harassment policy

applies to all persons involved in our operations and prohibits harassment by any employee of the Company, including shareholders, managers and coworkers.

Diversity Program

Since its founding, Switch has embraced a culture of diversity and equality, and is a technology company where women represent more than half of our **senior leadership team**. Switch's founder and CEO, Rob Roy, cultivates a unique client-oriented culture at every level of the company. The team's motivation and drive to produce the absolute best results for our clients manifests in unparalleled client value and the industry's best customer service.

Workforce diversity is critical to success at Switch because it empowers us to deliver superior customer service, attract and retain talented team members, maximize productivity, and serve the communities in which we operate. Switch provides annual workplace diversity training to all its team members that focuses on what diversity is, how it's different from discrimination, and what team members can do to become more inclusive of others.



Switch is a corporate member of WESTERN REGIONAL MINORITY SUPPLIER DEVELOPMENT COUNCIL (WRMSDC), an affiliate of NMSDC

WRMSDC supports the growth and welfare of minority communities by championing the use of minority-owned businesses in Northern California, Nevada, and Hawai'i. The organization works to advance business opportunities for certified minority business enterprises and connect them to Corporate Members. Its parent organization, the National Minority Supplier Development Council, helps over 12,000 minority businesses connect with major Fortune 500 corporations and their buyers every year.

Equal Employment Opportunities

Switch provides equal employment opportunities (EEO) to all employees and applicants. Switch is an equal opportunity employer and makes employment decisions on the basis of merit. In accordance with applicable law and the Equal Employment Opportunity Commission ("EEOC"), Switch prohibits discrimination against any applicant or employee based on any legally recognized basis, including, but not limited to: race, color, religion, sex, sexual orientation, gender identity, gender expression, pregnancy (including childbirth, lactation or related medical conditions), age, national origin or ancestry, physical or mental disability, veteran status, uniformed service member status, genetic information (including testing and characteristics), or any other consideration

protected by federal, state or local laws. Switch's commitment to equal opportunity employment applies to all persons involved in Switch's operations and prohibits unlawful discrimination by any employee or agent of Switch, including supervisors and coworkers. This policy applies to all terms and conditions of employment, including recruiting, hiring, placement, promotion, termination, layoff, recall, transfer, leave of absence, compensation and training.

Gender Pay Equality

Switch is committed to providing competitive and equitable pay to all team members without regard to race, color, religion, sex, sexual orientation, gender identity, gender expression, pregnancy (including childbirth, lactation or related medical conditions), age, national origin or ancestry, physical or mental disability, veteran status, uniformed service member status, genetic information.

This information is contained in our internal EEO-1 Report. The data is provided annually to the U.S. Department of Labor for statistical analysis available to the general public.

Targeted Recruitment of Military Veterans

At Switch, we make a concerted effort to hire qualified military veterans. We find their experience, discipline, and leadership qualities as extremely valuable attributes, particularly within our mission critical data center operations and security staff. Veterans currently represent over 20% of our full-time staff, the majority of whom work within our Security Operations team.



A network diagram is constructed on a white surface using several silver-colored pushpins and thin, light-colored string. The pins are arranged in a non-uniform pattern, and the string is stretched between them to form a series of interconnected triangles and polygons. The network is more densely connected in some areas, with one central pin having multiple connections, while other pins have only one or two. The overall structure suggests a web or a complex system of relationships.

COMMUNITY INVOLVEMENT

Good Neighbor Commitments

Switch is actively engaged in mitigating its impact on the environment and communities where its data centers are located. This involves technologies used on the generators for mechanical noise reduction which includes engine and radiator fan noise. To achieve noise reduction levels, Switch added baffled air intake and radiator discharge plenums. It also increased area, density and thickness of the internal insulation materials. To strengthen exhaust noise reduction, we installed larger internal exhaust silencers with additional external secondary silencers, resulting in a 30dBA reduction from previous designs and sound levels reduced to approximately 46dBA vs. 76dBA (@ 100').

While most of Switch's data center campus locations are within commercially zoned areas, in the fast-growing city of Las Vegas, residential areas sprung up and single-family houses became our neighbors. However, to ensure that because of the sheer size of Switch's data centers and air handlers we did not detrimentally impact the surrounding neighborhood.

To ensure this, Switch hired a 3rd party consultant to evaluate the noise level for our air handling units. The consultant conducted a study that would assist the company in avoiding negative impacts in residential neighborhoods. The feedback from the consultant resulted in modifications to our AHUs that surpassed Nevada code title 30 section 68's requirements.



As a result, Switch made some changes to its air handling units. Previously, air handler units deployed were designed so that the compressors were not enclosed 100%. The compressors were located next to the coils and vented panels. This resulted in noise levels that could be heard 200-300 feet away, and as the units ran longer and harder, it resulted in higher noise levels.

To alleviate this problem, the compressors were moved within the AHU and fully enclosed with padding so that they could not be heard beyond 5-10 feet resulting in a noise reduction approximately 95%.

Philanthropy

Switch was founded on the principle of karma: putting good energy out into the world and getting good energy back. As Switch builds more data centers to respond to the rapid growth of the Internet, we work to ensure that the surrounding communities, economies and the planet also benefit. Each year, we set aside funds designated to supporting our local communities.



Rob Roy's Innevation Center

Rob Roy's Innevation Center is our Founder and CEO's philanthropic contribution back to the state of Nevada. It is a collaborative co-working and event space that is focused on the advancement and exploration of emerging technologies like artificial intelligence, robotics, and STEAM education.



University Nevada Las Vegas (UNLV)

Switch has collaborated closely with UNLV to foster educational progress, career opportunities, and entrepreneurship in the local community.

- Switch partnered with UNLV on its athletics initiative focused on sports-science, data analytics and student-athlete success; creating the **Switch Sports Science Studio** with a multi-year financial grant
- Switch donated money towards the UNLV Senior Design Competition for the College of Engineering Design Project and hosted it free of charge at Rob Roy's Innevation Center



Nevada Museum of Art

Switch was previously a multi-year supporter of the Nevada Museum of Art STEAM Curriculum program in Reno: 6,500 Pre-K-12 grade students receive STEAM-based educational lessons annually, 1,200 Pre-K-12 teachers participate in professional development programs annually. Switch also committed a pledge to the Nevada Museum of Art at Symphony Park development in Las Vegas.



Green our Planet

Switch is a Platinum Sustaining Sponsor of Green Our Planet Outdoor Garden Classrooms. Green our Planet runs the largest school garden program in the United States and the largest student-run farmers market in the nation. They build outdoor vegetable garden classrooms and develops curriculum focused on STEAM, health and nutrition, emphasizing the importance of fresh foods and healthy eating among youth. These efforts have resulted in: 150 gardens built, 80,000+ students benefitting, 3,000+ teachers actively using their STEAM curriculum, a 200+ student farmer's market, and 1,200 teachers trained.



ArtPrize

Switch is a major multi-year sponsor of ArtPrize, an international art competition in Grand Rapids, Michigan as the exclusive sponsor powering the ArtPrize STEAM Village Learning Lab and Mobile STEAM Lab experiences.

Connectivity for Good: The Switch SUPERLOOP® Upgrades Rural Education

Switch extended fiber from the Switch SUPERLOOP® to upgrade and connect rural Nevada schools to high-speed broadband communications, increasing internet capacity by 2000% and decreasing costs by 14%. Switch provided private loans to White Pine, Lyon and Elko County school districts to fund their network equipment, leveraging our telecommunications buying power to reduce costs and improve the speed of internet connectivity in Northern Nevada schools.

Fiber and connectivity from the Switch SUPERLOOP® serves as the backbone for local ISPs – Valley Communications and Churchill County Communications – to deliver high-speed broadband to rural school districts in Northern Nevada. This increased high-speed connectivity and bandwidth enhances access to technology in the learning environment, and provides the infrastructure to support the future growth of technology integration within these rural districts for years to come. For example, this high-speed connectivity allows schools to administer standardized testing over the internet without the interruption of slow and unreliable service. Lost connections in the middle of an exam can force students to start over, which is simply unacceptable.

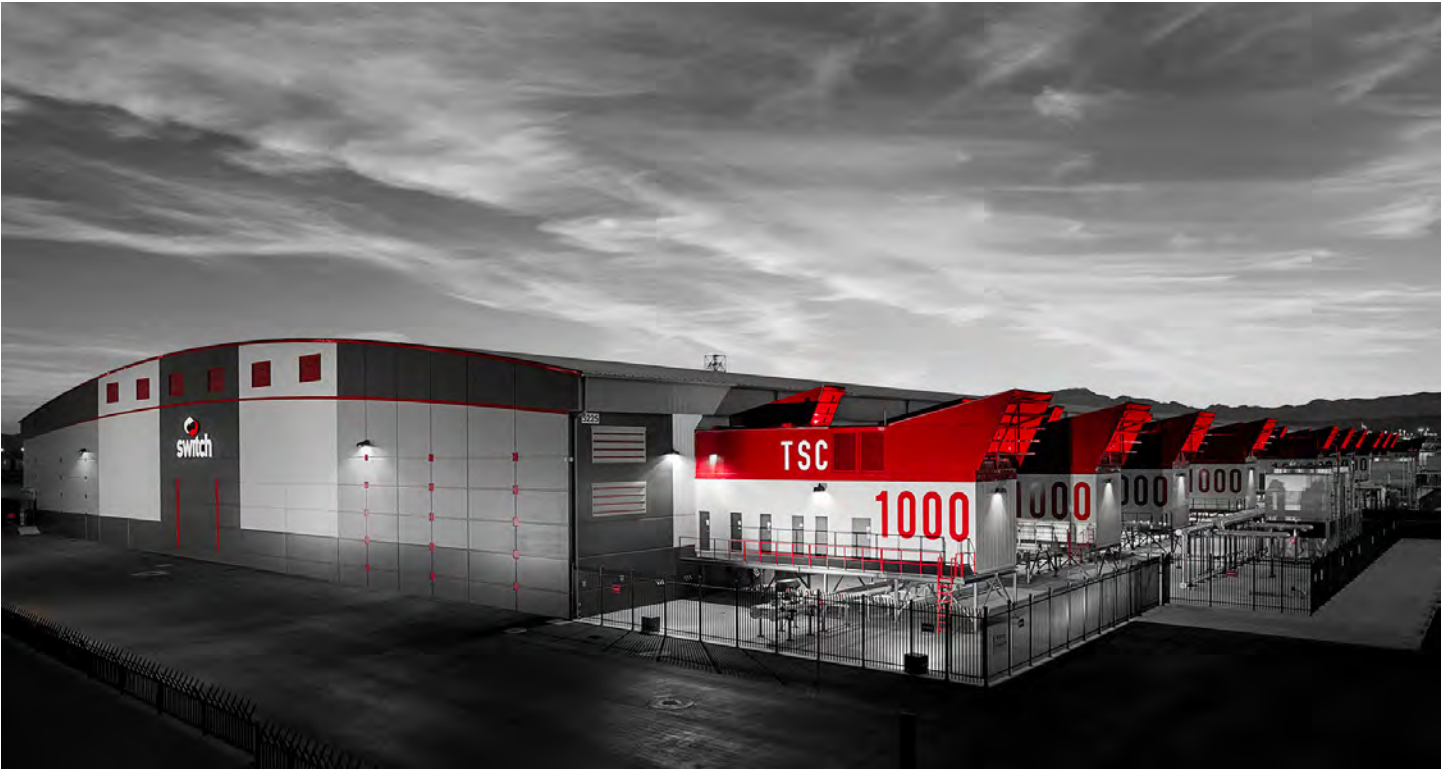
Switch fiber enables the following connections for educational purposes:

- Beatty High School and the greater Beatty community with service via Valley Communications, now the first all fiber-optic community in Nevada.
- Hawthorne Elementary School via Churchill County Communication
- Lyon County School District via Churchill County Communications
- Switch directly services the Walker River Paiute Tribe community

Switch maintains a library of additional policies and procedures to ensure its services are Tier 5 Platinum compliant and meet Switch's aggressive sustainability standards. Switch secures these policies on site, to avoid the security risks of espionage, terrorism, sabotage, and cyber attack, inherent in unauthorized duplication, proliferation, or exploitation of these policies. If you would like additional detail or an on-site tour of Switch's facilities to inspect these policies, please contact the Investor Relations Team (investorrelations@switch.com) or the Switch Policy team (Policy@switch.com).



BUSINESS ETHICS



Business Ethics Program

Switch is committed to addressing major business ethics risks and to upholding the highest ethical standards among its executives, employees, and business partners; while addressing ethics risks related to our business.

The company has adopted a **Code of Business Conduct and Ethics** (the "Code") to encourage:

- Honest and ethical conduct, including fair dealing and the ethical handling of actual or apparent conflicts of interest
- Full, fair, accurate, timely and understandable disclosures
- Compliance with applicable laws and governmental rules and regulations
- Prompt internal reporting of any violations of law or the Code.
- Accountability for adherence to the Code, including fair process by which to determine violations
- The protection of Switch's legitimate business interests, including its assets and corporate opportunities
- Confidentiality of information entrusted to directors, officers and employees by Switch and its customers
- Switch directly services the Walker River Paiute Tribe community

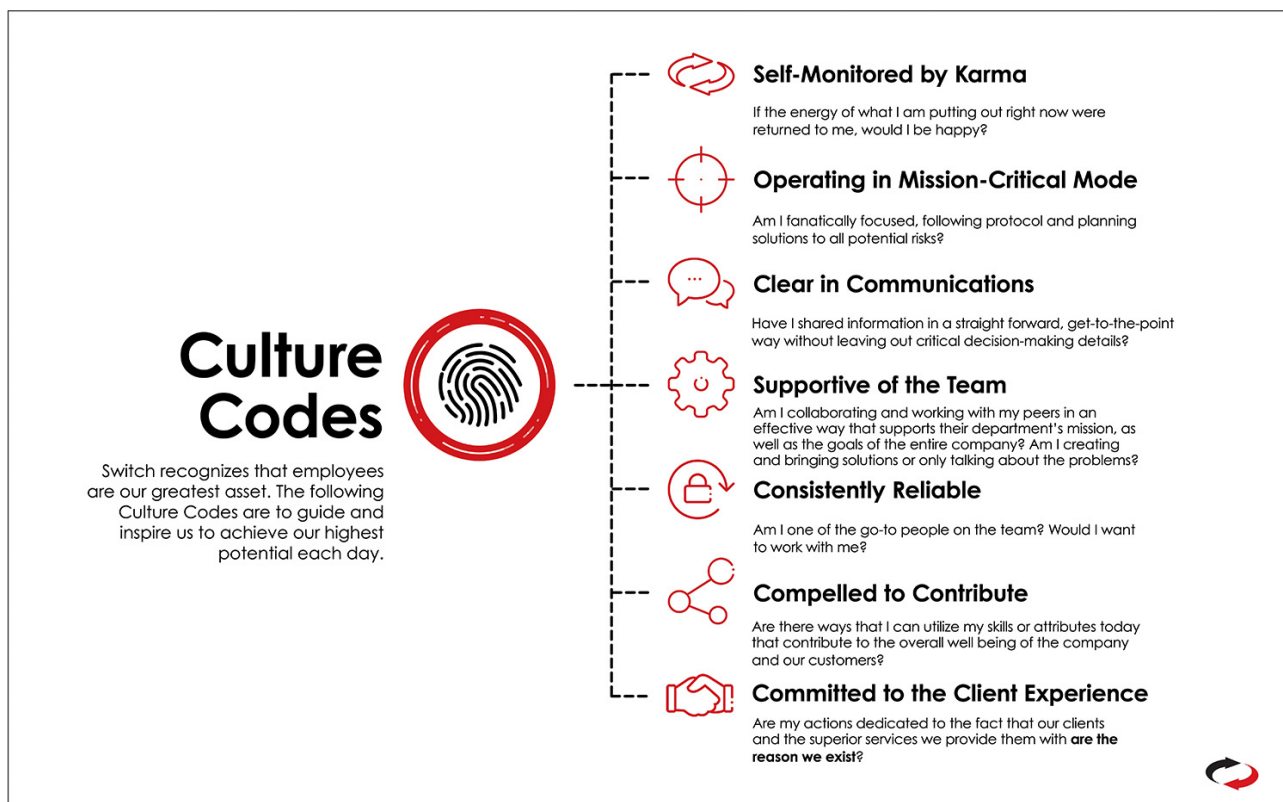
Oversight and Ethical Risk Assessments

Ethics policy is overseen by the Switch Board of Directors Audit Committee, which is comprised of three independent board members. At least annually, the Committee is required to meet with senior management and our third-party auditors to consider and discuss Switch's ethics policy as set forth in the Code of Business Conduct and Ethics; and the procedures in place to enforce the Code's provisions. The Audit Committee must also discuss Switch's policies with respect to risk assessment and risk management, ensuring that measures are in place to continually identify and mitigate ethics-related risks faced by the company. Please reference our **Audit Committee Charter** for additional information regarding Audit Committee responsibilities.

Managers and supervisors have an important responsibility to lead by example and maintain the highest standards of behavior. Department and business unit leaders should promote a work environment where employees understand their responsibilities and feel comfortable raising issues and concerns without fear of retaliation. If a manager becomes aware of an ethics violation or has knowledge of a potential ethics-related issue, they are expected to take immediate steps toward resolution.

Operating Guidelines

As a set of guidelines for employee behavior, Switch has established "Culture Codes" intended to guide and inspire our team to achieve its highest potential each and every day.



Operating Guidelines: Switch Culture Codes

1. **Self-Monitored by Karma:** If the energy of what I am putting out right now were returned to me, would I be happy?
2. **Operating in mission-critical mode:** Am I fanatically focused, following protocol and planning solutions to all potential risks?
3. **Clear in communications:** Have I shared information in a straightforward, get-to-the-point way without leaving out critical decision-making detail?
4. **Supportive of the team:** Am I collaborating and working with my peers in an effective way that supports their department's mission, as well as the goals of the entire company?
5. **Consistently reliable:** Am I one of the go-to people on the team? Would I want to work with me?
6. **Compelled to contribute:** Are there ways that I can utilize my skills or attributes today that contribute to the overall well-being of the company and our clients?
7. **Committed to the client experience:** Are my actions dedicated to the fact that our clients and the superior services we provide them are the reason we exist?



Training, Reporting, and Compliance

It is the responsibility of all Switch employees to understand and to comply with the code. Subject to applicable law, if an employee violates the policies and procedures in our Code, they may be subject to disciplinary action, up to and including termination of employment. If an employee believes their actions may violate our Code, they are instructed to raise the issue to their direct supervisor and the VP of Human Resources. Switch may waive application of the policies set forth in our Code only when circumstances warrant granting a waiver based on the best interests of Switch and its shareholders. A waiver of any Switch policy or section of our Code requested by an employee must be approved by the employee's manager and the Compliance Officer. Employee waiver requests will be reviewed and granted on a case-by-case basis. Waivers of the Code for directors and executive officers must be approved by disinterested directors and will be disclosed as required by applicable law or regulation.

Investigations of reported incidents, including potential violations of the Code, are conducted by the Switch Human Resources department and the Legal Department. Corrective actions will be based on the facts and circumstances of each particular situation. Any employee or other Covered Person found to have violated the Code or applicable local, state, or federal laws may be subject to civil damages, criminal fines, or imprisonment. Individuals accused of violating the Code will be given an opportunity to present his or her version of the relevant events prior to the conclusion of any investigation or decision on corrective action.

All employees are required to complete an annual training assessment on the Code, including our policies regarding Bribery and Corruption, as described below.

Bribery & Corruption

Acceptable Behavior

As referenced in the **Code of Business Conduct and Ethics**, employees have an obligation to conduct Switch's business in an honest and ethical manner, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships. Any situation that involves, or may reasonably be expected to involve, a conflict of interest, should be disclosed promptly to Switch legal.

Employees may not engage in any conduct or activities that are inconsistent with Switch's best interests or that disrupt or impair Switch's relationship with any person or entity with which Switch has or proposes to enter into a business or contractual relationship.

Employees may not accept compensation, in any form, for services performed for Switch from any source other than Switch. Employees may not take up any management or other employment position with, or have any material interest in, any firm or company that is in direct or indirect competition with Switch.

Definition and Prohibition of Bribery

No employee should ever offer, make or authorize a payment or provide a benefit to an individual or

company that is intended to influence, or that appears to improperly influence a business decision. In addition, no employee should ever request or accept a bribe or a kickback of any sort.

Switch prohibits bribes, kickbacks or any other form of improper payment, whether made directly or indirectly to any representative of government, labor union, customer or supplier in order to land a contract, secure some other business advantage, or influence or obtain government action.

Conflicts of Interest

A conflict of interest occurs when an employee's private interests interfere, or appear to interfere, with Switch's interests as a whole. For example, a conflict of interest can arise when an employee takes actions or have personal interests that make it difficult to perform that employee's duties objectively and effectively. A conflict of interest may also arise when an employee or a member of an employee's family or household receives improper personal benefits as a result of their position at Switch.

Managerial Oversight and Risk Assessments

Our Audit Committee is responsible for overseeing our risk management process with respect to financial risks, including bribery and corruption. Managerial responsibility for bribery and corruption sits with executive management, specifically the Chief Financial Officer and Chief Legal Officer. Annual Financial, Information Technology and Enterprise Risk assessments are performed in accordance with applicable frameworks (e.g. SOX, NIST, ISO, COSO). These risk assessments are inclusive of fraud, bribery and corruption risks and are evaluated within the context of the type of risk assessment. All risk assessment findings are reported to executive management and where applicable, action plans are created to mitigate any identified risk.

Operating Guidelines and Internal Monitoring

Switch Code of Business Conduct and Ethics and Policy for Accounting Complaints are policies (or operating guidelines) which govern record keeping, approval procedures and appropriate behavior. These policies are reviewed and updated where necessary by our legal team, specifically our Corporate Secretary. The two main internal monitoring systems to detect and report corruption are, Switch's Ethics and Whistleblower Hotline and Switch's quarterly sub-certification program. All Switch employees have access to our independent third-party Ethics and Whistleblower Hotline to report potential instances of fraud, bribery, and/or corruption. Complaints can be submitted via email, phone, or through the internal website created for all employees. In addition, on a quarterly basis, executives within the organization must complete a sub-certification questionnaire that addresses fraud, bribery and corruption. These questionnaires are reviewed by the Chief Financial Officer and head of Switch Internal Audit.

Whistleblower Programs

Reporting and Consultation on Ethical Issues

Switch promotes ethical behavior at all times and encourages its employees to talk to a direct supervisor, Switch human resources or a Switch executive when in doubt about the best course of action in a particular situation.

Employees are instructed to promptly report suspected violations of laws, rules, regulations or of the Code. In most cases, a direct supervisor or Switch Human Resources will be in the best position to resolve the matter. If the issue persists, employees are encouraged to report the issue to Switch Legal or any Switch executive.

Reports may be made anonymously. If requested, confidentiality will be maintained, subject to applicable law, regulations and legal proceedings and to the extent practicable.

Reports submitted through the hotline described below are received and processed by our third-party independent partner, Lighthouse Services. These reports are documented within a web application that the head of Switch Internal Audit, Chief Legal Officer and VP of Human Resources have access to. Internal Audit is an independent objective department reporting directly to the Audit Committee Chair and responsible for assisting in responding to whistleblower reports.

All whistleblower reports are disclosed and communicated to the Audit Committee on a quarterly basis. Each report outlines the type of misconduct and measures taken to address each report. Reports are available in English and Spanish.

Non-Retaliation

To encourage employees to report any and all violations, Switch will not tolerate retaliation for reports made in good faith. Retaliation or retribution against any employee for a report made in good faith of any suspected violation of laws, rules, regulations or this Code is cause for appropriate disciplinary action.

Policies Related to Third-Parties

Switch's commitment to compliance with anti-bribery and anticorruption laws extends to the third parties with whom we do business. Third-party guidelines include the following:

- Report all allegations of improper business practices, bribery and corruption relating to third parties
- Report all allegations of improper business practices, bribery and improper influence on the decisions of a government official
- Ensure that any person or firm that represents Switch complies with this policy and all related laws

Ethics Hotline

If employees are not comfortable discussing certain ethical matters with Switch personnel, Switch has established an independent hotline available 24/7 to receive concerns regarding Switch's financial statements or accounting matters, as well as conflicts of interests and violations of its Code of Business Conduct and Ethics.

The Ethics Hotline can be accessed as follows:

Website: www.lighthouse-services.com/switch

Email: reports@lighthouse-services.com

(must identify Switch in the email)

Phone: (844) 440-0097

Fax: (215) 689-3885

(must identify Switch on the cover page)

Political Involvement Policy

Switch is active in advocating for policies at the Federal, State and Local levels of government that impact our company, our environment and our technology future in general. As a growing company, we believe it is important to have effective elected and appointed leaders in government who support and understand our industry. This includes appropriate political support for political candidates and issues. All contributions are made in accordance with applicable federal, state and local laws and regulations.

All practices Switch implements in support of this policy are directed by Switch's EVP of Strategy and executed through the Strategy Team's members in accordance with the policy directive. Under the direction and vision of our CEO, Switch's EVP of Strategy and the Strategy Team develop political contribution activities and process all political support requests for consideration. The CFO, President and CEO review plans, budget, and overall progress on a regular basis.

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Switch also pursues strategic memberships in organizations that advocate for policies we support; including: Governor's Office of Economic Development in Nevada, the Metro Chamber of Commerce in Las Vegas, The Global Economic Alliance in Las Vegas, The Right Place in Grand Rapids, the Grand Rapids Chamber, Detroit Chamber of Commerce, the Georgia State Chamber of Commerce, the Douglas County Chamber of Commerce, Energy Storage Association and many more.

Employees are entitled to campaign or voice support for the lawful political candidates of their choice. Under no circumstance are employees authorized to endorse, voice support of, or campaign for an elected or running official by virtue of, or in their capacity as an employee, agent or representative of Switch.

Switch encourages employees to fulfill their civic responsibilities by participating in all local, state and federal elections, including primaries. If employees are unable to vote in an election during non-working hours, Switch may grant up to three hours of paid-time-off to vote.

Lobbying & Political Expenses

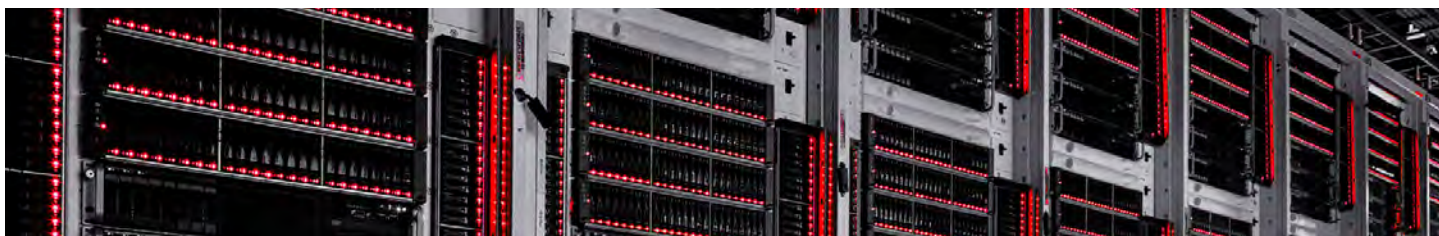
Switch engages advocacy representatives in Washington, D.C, Nevada, Michigan and Georgia to further our interests and to assist in policy development that impacts our company.

Switch believes in total transparency of its activities in the lobbying and political contribution arena. The company complies with all required ethics and lobbying disclosure requirements and strictly adheres to various laws and regulations concerning gifts, entertainment, lobbying expenses and reporting requirements in each jurisdiction.

All lobbying activities are executed through the Strategy Department, led by the EVP of Strategy. All practices we implement in support of the policy are under the direction of our CEO, directed by the EVP of Strategy and executed through the Strategy Team Members in accordance with the policy directive.

Switch maintains a library of additional policies and procedures to ensure its services are Tier 5 Platinum compliant and meet Switch's aggressive sustainability standards. Switch secures these policies on site, to avoid the security risks of espionage, terrorism, sabotage, and cyber attack, inherent in unauthorized duplication, proliferation, or exploitation of these policies. If you would like additional detail or an on-site tour of Switch's facilities to inspect these policies, please contact the Investor Relations Team (investorrelations@switch.com) or the Switch Policy team (Policy@switch.com).

DATA PRIVACY & SECURITY



Cybersecurity Program

Switch's cyber management system is **certified to ISO 27001** standards and 100% of the ISO 27001 requirements are covered/certified for our colocation services. A list of additional audit reports can be accessed on the audit reports page of our corporate website, by **clicking here**. Please email **auditreports@switch.com** for an approval code to access these reports.

Customer Data Policy

As a provider of data center infrastructure, Switch covenants not to attempt to logically or digitally access, manage, maintain, or process any information on customer equipment without the prior written consent of the relevant customer; and each customer covenants not to provide Switch with access to such information without the prior written consent of Switch. Moreover, Switch does not transmit, receive, store, process, control, sub-process, manage, manipulate, or otherwise access or utilize data: (a) on behalf of our customers; or (b) resident on customer equipment, servers, or computers. Additionally, Switch is not able to monitor the processing of customer personal data, nor do we share customer data with third-parties under any circumstances.

Please reference our **Acceptable Use Policy** and our statement on **GDPR Compliance** for additional information regarding Switch's programs and policies relating to the usage, collection, and protection of customer data.

Governance Structures

Switch has a structure in place for the oversight, compliance, and responsibilities for cybersecurity. Please reference directly below for additional information.

Executive Oversight

- President
- Chief Legal Officer
- EVP of Network Operations

Compliance and Information Security

- Director of IT Compliance
- Director of Information Security (INFOSEC)
- EVP of Network Operations

INFOSEC responsibilities and methods:

- Administering Risk Assessments based on the NIST Cyber Security Framework (CSF), NIST 800-30, and ISO 27001:2013 ISMS.
- Methods: Real Time Analysis of Threats, Adherence to Regulatory Standards, Assuring Preventive Controls are in place and functional.

Monitoring and Response Protocol for Data Breaches & Cyberattacks

Switch has operational measures in place to monitor and respond to data breaches and cyberattacks. Please reference directly below for additional information.

Annual Cyber Risk Assessment

A cyber risk assessment is conducted annually by our Information Security team. This involves the identification of, and mitigation plan for key risks, including: **1. denial of service, 2. malicious code, 3. unauthorized access, 4. compromised asset or information, 5. social engineering, 6. internal/external hacking, 7. unauthorized data leakage, 8. inappropriate usage, 9. environmental/external, 10. business model, 11. leadership changes, 12. third party, 13. fraud.**

Incident Response Plan (IRP)

An Incident Response Plan (IRP) has been developed as an integral component of Switch's overall information security program. The IRP includes action plans that deal with intrusions, data theft, denial of service (DoS), and other IT security-related incidents.

The six major steps of the IRP are designed to ensure Switch is prepared to effectively detect and respond to incidents in an effective manner to minimize adverse impacts and provide lessons learned.

The IRP steps are as follows:



Cyber Kill Chain

Switch InfoSec uses the Cyber Kill chain model for intelligence used to identify and prevent intrusion activity. The model identifies what the adversaries must complete in order to achieve their objective.

Switch SAFE

Switch SAFE is a scalable DDOS mitigation service available for customer use at every Switch data center campus location. It is a sophisticated system of software applications and hardware appliances that support client data security. [Click here](#) for additional information regarding Switch SAFE.

Internal Security Audits

Switch has a policy in place for regular internal security audits that address vulnerability assessments or penetration testing of the company's systems, products and practices affecting user data. Please reference directly below for additional information.

Vulnerability Management

Automated scans are continuously conducted on the entire Switch Information System, this includes the critical infrastructure that is segmented and access controlled. Information Security is responsible for ensuring that the signatures used by the Vulnerability Assessment Suite are updated periodically.

Penetration Testing

A third-party penetration test is conducted semi-annually. The scope of these regular tests are as follows:

1. Externally facing web applications
2. Applications in the DMZ
3. All internal trusted Switch information systems
4. Users are assessed for susceptibility to phishing
5. Vulnerabilities are tested for exploitability



Employee Training

Switch has a policy in place for its employees to undergo regular training on Information Security Awareness. Please reference directly below for additional information.

Information Security Awareness

- All Switch employees are required to complete the Information Security Awareness Training module on an annual basis, which includes an exhaustive review of our internal policies relating to Cybersecurity and Data Privacy. This information is also provided in the Employee Handbook, and must be attested to and signed by each employee on an annual basis

- Quarterly bulletins are published to employees covering various topics around information security, and employees are continuously assessed for susceptibility to e-mail phishing
- Switch employees have access to a phishing alert software for easy-reporting of any email that is a suspected phishing attempt, which reports directly to oversight teams for further evaluation

Data Privacy & Security Programs and Policies

Switch has several programs and policies in place related to data security and the protection and privacy of customer data. Please reference directly below for additional information. For information regarding governance structures for data privacy management, please reference the section above titled "Governance Structures".



Cybersecurity Program Plan (CSPP)

The Switch Cybersecurity Program reflects our commitment to implement leading data protection standards on behalf of our clients and with respect to our own internal data systems. Its primary mission is to protect the Confidentiality, Integrity, and Availability of the Switch Information System. Thus, the CSPP outlines a framework for implementing a defense-in-depth layered protection approach that consists of complementary technical, operational, and management controls for the Switch Information System.



Program Scope

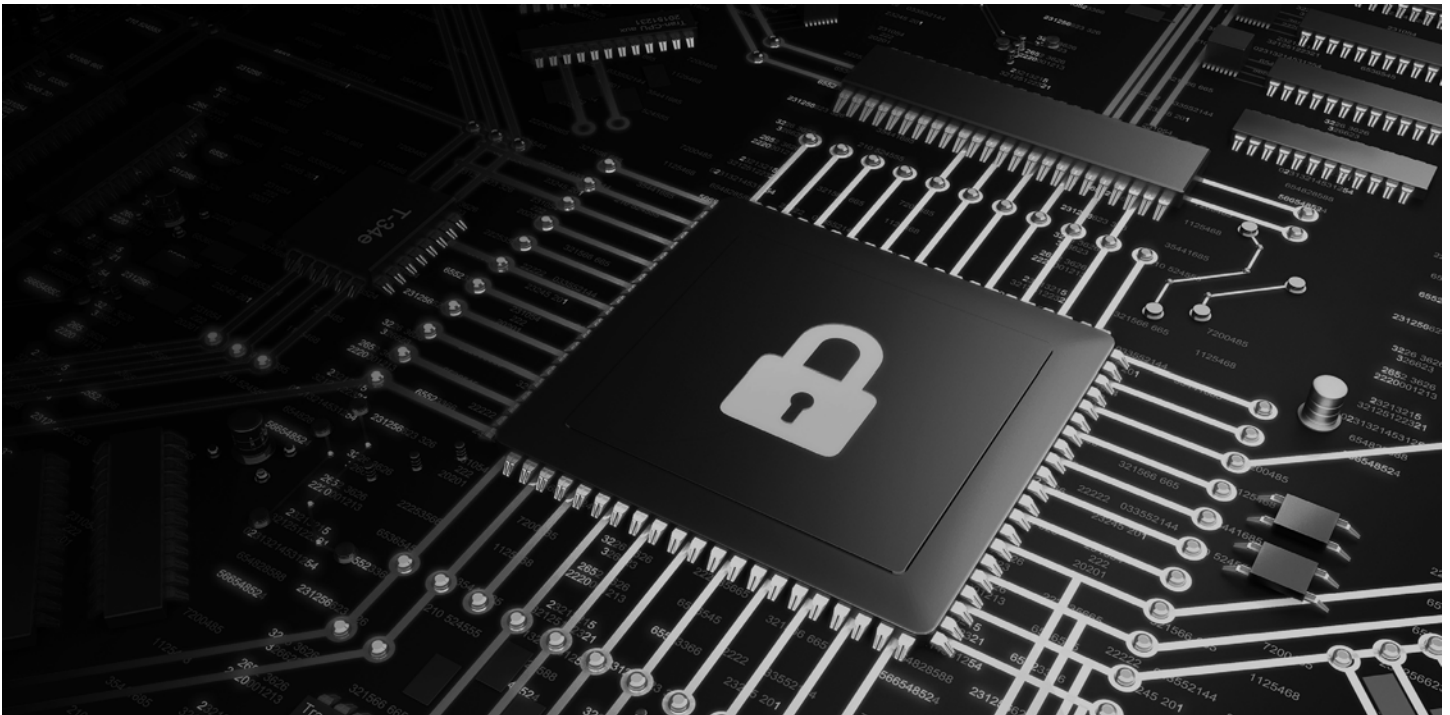
The CSPP applies to the entire Switch Information System (any system that stores, process, or transfers Switch data), which includes support systems, major applications, and minor applications. In accordance with the IT Information Security Policy, NIST 800-53 Risk Assessment, and ISO 27001 ISMS, the CSPP describes the requirements designed to sustain a defense-in-depth approach for protecting the Confidentiality, Integrity and Availability of the Switch Information System. It provides guidance and requirements for the implementation of security controls to protect Switch from cyber-attacks and threats; thus, minimizing any impacts to the systems and information that are necessary to manage and operate Switch facilities and services.

Physical and Environmental Security

As a trusted service provider of the world's only Class 5 Platinum data center facilities, we are fully focused on delivering physical and environmental security for our data centers worthy of supporting mission critical deployments. Third-party audited reports regarding our compliance with these initiatives are available upon request. Simply email auditreports@switch.com for assistance. You may also visit <https://www.switch.com/audit-reports/>

Incident Response and Reporting Mechanisms

Switch is committed to notify data subjects (including customer representatives and Switch employees) in a timely manner with respect to policy changes and/or any known incidents regarding the breach of customer data.



The Switch Network Operations Center (NOC) is available 24/7/365 for data subjects to raise concerns about data privacy. Users are the first line of defense, as they are likely to detect any odd behaviors within their systems. The Switch NOC provides an incident response support resource to offer advice and assistance to users of the information system for the handling and reporting of security incidents. Users are required to notify the NOC of an obvious or potential cyber security-related event occurring on any Switch system.

Additionally, the Switch Ethics Hotline is a third-party, anonymous reporting hotline allowing users to report incidents related to ethical and compliance concerns/violations.

Privacy Risk Assessments and Third-Party Audits

Various independent audits are conducted annually by Schellman & Company regarding Switch's technologies, security protocols, and practices affecting the privacy of user data.

ISO Certificate Directory

Other audit reports include: SOC 1, SOC 2, SOC 3, MPAA, PCI DSS-ROC, PCI DSS-AOC, NIST 800-53 (Type 1), HIPAA (Type 1). These reports are available upon request at <https://www.switch.com/audit-reports/>

Switch maintains a library of additional policies and procedures to ensure its services are Tier 5 Platinum compliant and meet Switch's aggressive sustainability standards. Switch secures these policies on site, to avoid the security risks of espionage, terrorism, sabotage, and cyber attack, inherent in unauthorized duplication, proliferation, or exploitation of these policies. If you would like additional detail or an on-site tour of Switch's facilities to inspect these policies, please contact the Investor Relations Team (investorrelations@switch.com) or the Switch Policy team (Policy@switch.com).

OPERATIONS & SAFETY



Oversight, Risk Assessment & Training

Our Data Center Operations (DCO) team is responsible for conducting regular maintenance on all data center facilities and critical systems equipment operated by Switch. DCO's mission is to deliver 100% uptime to our clients while ensuring the health and safety of our critical systems staff.

Safety Procedures

Through the development of its policies, Standard Operating Procedures (SOP), Method of Procedures (MOP), and detailed operational scripts, DCO Systems is committed to maintaining the critical systems assets that are integral to our business. All critical systems assets are maintained in accordance with manufactures' recommended practices to ensure maximum availability to our clients, as well as strict adherence to safety protocols for all employees, clients, and third-party vendors.

Using a committee-based approach, DCO procedures are reviewed annually to ensure all maintenance practices are compliant with industry regulations and updated to reflect evolutions in manufacturing design. Critical systems maintenance is performed internally by trained and certified DCO Systems Technicians, and externally by factory authorized vendors. This enables us to maintain a system of checks and balances, and ensure that equipment is being maintained in accordance with recommended practices.



Key Critical Systems Maintained by DCO

- **Air Handler Units (AHU)** – Maintain all systems to provide N+1 cooling availability to Switch clients and ensure the most efficient modes of cooling are available to run at the lowest possible PUE
 - **Fluid Cooler Units (FCU)** – Maintain all systems to provide additional cooling efficiencies to the AHUs, maintain water systems to reduce water usage and waste, and meet compliance regulations for safety (ASHREA 188 legionella requirements) and permitting requirements (Clark County)
 - **Generators** – Maintain all systems to provide 3 separate configurations of 2N+1 backup power generation availability to Switch clients, maintain compliance of fuel systems to include polishing (ISO 4406)
 - **Uninterruptable Power Supply (UPS)** – Maintain all systems to provide 3 separate configurations of 2N+1 backup battery power, maintain battery program through live monitoring to ensure backup battery power is readily available to support full design critical loads for 12 minutes and extend the life of batteries to reduce operational costs and waste
 - **Power Distribution Units (PDU) and Remote Power Panels (RPP)** – Maintain all power distribution systems to maximize power availability to Switch clients, and ensure maintenance practices are compliant with relevant industry standards (IEEE, NFPA, ASHREA)
 - **Comfort Cooling (Office/Conference Spaces)** – Maintain all cooling and power systems for office and conference room areas for customers, employees, and third-party vendors
-

Managerial Responsibility

DCO Systems management has a developed quality-control process for facility management; and our technicians are trained to review all critical systems work performed.

Before policies and procedures are published and/or amended, they must be reviewed by the SVP of Data Center Operations and other members of senior management. This is to ensure all maintenance practices remain within manufacturers recommended maintenance practices, and meet or exceed industry standards for safety and regulatory compliance.

Risk Assessment

A risk assessment is performed during the development/review of Standard Operating Procedures (SOPs); and is attached to the procedure for technicians to read, review and confirm the risk assessment before beginning work. This risk assessment includes a review of safety and operational hazards, as well as any history of events that may pose risk to client service delivery.

Employee Training

New employees go through an extensive 90-day on-boarding training program to include fundamental training on all critical facility assets, safety requirements, and any administration tools needed to perform daily work functions. After the 90-day on-boarding period, technicians enter into a tech-leveling program. This involves on-the-job training, advanced courses, and factory/manufacture training sessions to fully certify technicians before performing required critical tasks. In addition, DCO Systems offers ongoing training opportunities to ensure that employees remain up-to-date with required recertifications and bring safety to the forefront. Hazards around critical assets are common, and DCO Systems has a dedicated representative to build safety awareness among employees, and ensure assets are being maintained in a manner that minimizes risk.

Emergency Response, Incident Investigation, and Corrective Action

Emergency response procedures, or emergency operating procedures (EOPs), are evaluated and tested regularly through controlled drills. Any incident involving a systems failure/fault or safety concern (including near miss), is followed up with a Root Cause Analysis (RCA) and an After Actions Report (AAR) investigation. The purpose of the RCA is to summarize the incident or event, identify the root cause, and document immediate actions taken to resolve the issue. The purpose of the AAR is to identify all possible actions or solutions to minimize/eliminate future incidents, and track all policy changes.

Product & Safety Performance Monitoring

- **Product performance:** All critical assets are monitored in real-time through Building Management Systems (BMS) to ensure they are performing and delivering services in accordance with customer SLAs and Switch's AUP. BMS is also responsible for monitoring Power Usage Efficiency (PUE) and Water Usage Efficiency (WUE) metrics. The maintenance of all critical assets is tracked within Switch's Enterprise Resource Planning (ERP) system to ensure that assets are being maintained within the recommended maintenance occurrences established with the manufacturer and SOC compliance (SSAE16 audit).
- **Safety Performance:** Safety training requirements are actively tracked through an LMS (Learning Management System) to ensure all technicians remain compliant to perform daily tasks. DCO Systems has a department safety committee organized to offer technicians an opportunity to address safety concerns and make suggestions on how to improve health and safety procedures in the work environment. Safety committee meeting attendance is voluntary and is led by the DCO Systems Safety Representative on a monthly basis. Safety items are owned by the safety representative and escalated through management as needed to develop strategies for improvements. A member of DCO Systems Management also participates in a quarterly safety meeting to review safety performance.

Performance Objectives & Targets

- System + System (2N): Deliver 100% uptime for primary power source availability to the client, and minimize/eliminate downtime on redundant power source to ensure constant delivery of 2N power to the client.
- Temperature control: ASHREA A1 – A4 recommended range – 64.4°F to 80.6°F. Allowable range – 59.0°F to 89.6°F

External Safety Audits & Public Reporting

Safety audits and reporting, including OSHA/NFPA, are managed by Switch's Security Operations team. DCO Systems is in contract with environmental consultants to provide assistance in establishing permits and identifying reporting gaps for environmental audits. DCO Systems also works with water safety consultants to establish a water safety program in accordance with new 2018 ASHREA 188 standards surrounding legionella.

Regular Testing of Failover Equipment

Upon the installation of any new client equipment, DCO Systems recommends failover testing and provides support to each client to perform such tests. In addition, Switch's SLA/AUP recommends all clients perform self-administered failover tests on their equipment bi-annually throughout their deployment period. At least once per year during the scheduled annual UPS maintenance, DCO Systems transfers each customers' critical load to a backup generator. This is a controlled (i.e. "closed") transfer, meaning that no loss of power will occur during the test.



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