

ESG

ENVIRONMENTAL | SOCIAL | GOVERNANCE

SWITCH ESG REPORT 2021



A MESSAGE FROM OUR CHAIRMAN, CEO & FOUNDER

The timeless principle of Karma – the belief that putting good energy into the world returns good energy – has been an intentional principle of our company culture since I founded Switch.

Karma is deeply embedded in our business strategy, represented visually by our karma wheel logo and expressed practically in our operating philosophy, and demonstrated daily by how we treat clients, employees, and the community.

Throughout 2021, amid angst, uncertainty, and instability across the country, we focused our efforts on putting good energy into the world. As Switch continues to expand its data center campus ecosystems to facilitate the rapidly evolving technology landscape, we remain vigilant to ensure that the communities, economies, and people surrounding our PRIME campus locations also benefit from what we create.



We pursue these goals with a commitment to the highest ideals of integrity by operating within an ethical framework that supports doing the right things for the right reasons and leveraging the enormous power of our diversity of experiences, perspectives, backgrounds, and cultures.

This begins with our Board of Directors, which is strengthened by the fact that 78% are independent directors and one-third are women. Our Board is deeply committed to creating maximum value for stakeholders, and Switch demonstrated its engagement in 2021 by increasing the number of meetings for both the Board and its committees.

My vision for Switch, with the Board's full support, is to sustainably power the future of the connected world by providing the most secure, energy-efficient technology ecosystems to facilitate digital commerce and to do our part to enhance human productivity and drive economic prosperity. I believe that Data runs the Planet®, but it should not ruin the planet.

Therefore, a cornerstone of our company is our unwavering commitment to environmental sustainability.

In recognition of these efforts, Switch was named by Newsweek magazine as one of "America's Most Responsible Companies," reflecting our commitment to ESG, Corporate Social Responsibility, Sustainability, and Overall Corporate Citizenship. Switch also scored the highest environmental rating on S&P Global's ESG Indicator Report Card and is the only company to achieve an E-1 rating amongst more than 70 other Telecom and Data Center Companies.

Switch was awarded the Environmental Protection Agency's ENERGY STAR Certification for superior energy efficiency and has for the third year in a row been recognized as a top-ranked EPA Green Power Partner – a program to help build the American green power industry.

As we diversified our geographic footprint with the acquisition of Data Foundry in Austin, Texas, all Data Foundry campuses have since been powered by 100% renewable energy. Our campus in Texas now joins our Prime Locations across the country that have operated on 100% renewable energy with zero Scope 2 emissions since 2016.

In 2021, we invested in third-party verified carbon reduction projects offsetting the emissions associated with our direct operations. Through this and our 100% renewably powered data centers, our Scope 1 & Scope 2 carbon footprint is net zero.

Furthermore, we implemented our net positive water strategy, which started in Northern Nevada with the Regional Water Improvement Pipeline Project, which will provide 100% recycled water to Switch's Citadel Campus while protecting the surrounding area's precious natural resources.

Internally, we have always placed our people and their families at the heart of everything we do. Switch added a renewed focus on the needs of our team as they had to re-balance their lives in the face of ever-changing rules and restrictions to ensure public safety in every community in which we operate.

Switch launched the Virtual Wellness Center to help team members relieve stress, find peace, and practice mindfulness. We launched the Life Muse Fitness Series to support healthy living practices, which instructs and encourages team members to exercise at their own pace and skill level.

In support of the many parents among our team members, leadership development specialist and bestselling author Rachel Simmons participated in a Switch Insider Speaker Series on Pandemic Parenting. To maintain a consistent corporate culture, our Engagement and HR teams collaborated to create a virtual new hire orientation experience that is now available to all team members at any time.

The Engagement team hosted a Speaker Series featuring Dr. Quinn Pauly, Chief Medical Officer at Switch. Dr. Pauly provided an overview of the vaccine and answered questions submitted by team members. In addition, Dr. Pauly offered helpful tips and advice on dealing with anxiety and coping with evolving changes due to the pandemic.

Even as we adapted to the new challenges posed to the entire globe this past year, Switch continues to be recognized as a world leader in exascale data center ecosystems, edge data center designs, industry-leading telecommunications solutions, and next-generation technology innovation that supports the mission-critical infrastructure needs of our clients.

To facilitate and support these needs, Switch continued construction on its Prime Campus locations in 2021 with a plan to develop an additional 11 million square feet of data center capacity by 2030.

In 2021, the Switch team believed it was time to bring together all our investors and share our strategic vision to increase transparency for investors, many of whom had never been inside a Switch Campus.

I was privileged to present my vision and long-term strategy at Switch's Investor Day event in November 2021. The executive management team members joined me to outline Switch's leading sustainability practices, future objectives, and multi-year financial targets. We enjoyed sharing ideas, answering many thoughtful questions, and hearing insightful observations and feedback.

Our ability to innovate and execute in 2021 was critical to our nation. Our clients include some of the biggest names in healthcare, technology, finance, government, and the myriad of additional organizations that touch every aspect of our citizens' daily lives.

As I reflect on the past year, I am truly in awe of the unwavering dedication to family and community that Switch team members have incorporated into their daily lives and, in doing so, mirroring the core values upon which I founded and built this company.

From management's care for our employees' well-being, to our employees' diligence in making certain that our operations never faltered, to each of us maintaining the stability of our families and local communities, it has been an honor to work alongside these remarkable humans.


Chairman, CEO, & Founder
Switch, Inc.



SWITCH COVID-19 RESPONSE

As the world grapples with and works to overcome COVID-19 and its impacts on all of our lives, we are humbled by the extraordinary commitment made every day by the men and women of Switch to ensure that their families, communities and this company remain strong.

During the height of the pandemic, Switch provided important support to local communities and at its Prime Campus locations. Also, utilizing the expertise of Quinn Pauly, MD, FAAFP, Switch's Chief Medical Officer, we established internal safety protocols to ensure the health and safety of our employees and partners.

We established and coordinated the Business Emergency Operations Committee and the Business Information Network for government agencies.

We also supported our local communities with the following programs:

In Las Vegas, as a leading sponsor of the **"Switch to Kindness!"** Campaign, a partnership with the Vegas Chamber and the Las Vegas Metro Police Department (LVMPD) Foundation we supported the development of a platform to purchase electronic gift cards from local businesses to be distributed to Southern Nevada first responders.

In Northern Nevada, through the **"COVID Kindness"** program we provided front-line health care workers with hot meals.

In Michigan, through a partnership with The Grand Rapids Chamber, we supported local restaurants and provided meals to over 1,000 health care and public safety workers.

In Atlanta, through a partnership Douglas Strong Fund, we supported local restaurants and provided daily meals to hundreds of healthcare and public safety workers in addition to funding for Elevate Douglas COVID Relief Small Business Grant Fund, in a partnership with Google, Douglasville, the Douglas Chamber and the Douglas County Economic Development Department;

We provided multiple FLU vaccine clinics at all Prime locations to reduce the risk and impact of employees and dependents contracting influenza infections during the COVID-19 pandemic.

We hosted a blood drive during which employee blood donors were also screened for COVID-19 antibodies so that those with a high concentration of antibodies could volunteer to have their antibodies used to treat others suffering from COVID-19.

We have seamlessly transitioned our non-data center staff to a safe and productive remote work environment and have maintained 100% continuity of our operations for our clients.

We offered a Pandemic Parenting Speaker Series to all team members to aid with the challenges of parenting during the COVID-19 pandemic; and a Speaker Series featuring Dr. Pauly which provided an overview on the COVID-19 vaccines and answered questions that were submitted by team members.

We continue to closely monitor developments surrounding the COVID-19 pandemic and remain in close contact with state and local authorities in each of our PRIME campus locations to ensure the safety of our employees, clients and suppliers.



Switch is honored to play a part in giving back to our campus communities during these uncertain times.

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ABOUT SWITCH

Switch is a technology infrastructure ecosystem corporation whose core business is the design, construction and operation of the most advanced and highest-rated data centers on the planet. We believe that the future of humanity depends on the intelligent and sustainable growth of the Internet. As more people, businesses, governments and devices come online, the need for reliable data centers powered by renewable energy increases. **Powered by 100% renewable energy since 2016**, Switch's focus on sustainability and efficient technologies make our exascale ecosystems the most sustainable and cost-effective colocation environment in the industry. The Switch ecosystem empowers clients with a myriad of options for innovation, economies of scale, risk mitigation, sustainability and investment protection.

Our Approach to Meeting Third-Party Standards

This report provides disclosures compatible with the following third-party standards. All related metrics are disclosed in our integrated sustainability index in the Appendix of this Environmental Social and Governance (ESG) report.



Sustainability Accounting Standards Board (SASB)



Global Reporting Initiative (GRI)



Global Real Estate Sustainability Benchmark (GRESB)



Task Force on Climate-Related Financial Disclosures (TCFD)



Greenhouse Gas (GHG) Third Party Verifications

WORLD-LEADING SUSTAINABILITY



BEHIND-THE-METER RENEWABLE ENERGY



TIER 5 PLATINUM DATA CENTERS



DEDICATED RECYCLED WATER



INDUSTRY-LEADING RESILIENT CONNECTIVITY



WE SUPPORT

Other notable third-party certifications, memberships and partnerships:



SUSTAINABILITY AWARDS

2021

- Women in Smart Energy (WISE) Award Recipient
- Switch scores Highest Environmental Rating - S&P Global ESG Sector Report Card
- Newsweek - America's Most Responsible Companies, 2021

2020

- EPA Green Power Partnership: Top 10 Green Energy User in Tech & Telecom and 23rd Largest Green Energy user in the USA

2019

- SEIA Solar Means Business Report Recognition
- EPA Green Power Leadership Award
- Smart Energy Decisions: Data Center Energy Efficiency Technology Award

UN GLOBAL COMPACT

We are pleased to share that Switch remains a participant in the United Nations Global Compact. We affirm that we support the Ten Principles of the United Nations Global Compact on human rights, labor, environment, and anti-corruption. We have folded the UN Global Compact and its principles into the Switch strategy, culture, and day-to-day operations. On an annual basis, we will share a communication of progress with the UN towards support of the Ten Principles including goals, action plans and outcomes.



Our Commitment to United Nations Sustainable Development Goals

Reflected in our principle of Karma, we focus on putting good energy into the world which returns good energy. Switch has committed to initiatives, business practices, and policies that reflect our pledge to put good energy into the world. This commitment is aligned primarily to seven United Nations Sustainable Development Goals (UN SDGs).

- 1 **SDG #3: Good Health and Well-Being** – Ensure healthy lives and promote well-being for all at all ages
- 2 **SDG #5: Gender Equality** – Achieve gender equality and empower all women and girls
- 3 **SDG #6: Clean Water and Sanitation** – Ensure availability and sustainable management of water and sanitation for all
- 4 **SDG #7: Affordable and Clean Energy** – Ensure access to affordable, reliable, sustainable and modern energy for all
- 5 **SDG #9: Industry, Innovation, and Infrastructure** – Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation
- 6 **SDG #12: Responsible Consumption and Production** – Ensure sustainable consumption and production patterns
- 7 **SDG #13: Climate Action** – Take urgent action to combat climate change and its impacts





This pledge to the UN SDGs is demonstrated through our data center design, our policies, our responsible business practices, and our community engagement where we make the strongest impact. Throughout this report, we highlight areas of our business where we actively show our commitment to the UN SDGs.









SWITCH ESG HIGHLIGHTS


ENVIRONMENTAL

-  100% Renewably Powered Since 2016
-  Net ZERO Scope 2 Emissions Since 2016
-  Net ZERO Scope 1 Emissions Since 2021
-  Net Positive Water Projects

SOCIAL

-  Equitable Male / Female Pay Ratio
-  42% Ethnic Diversity Across Total Workforce
-  Semi-Annual Employee Pulse Survey
-  Mental Health Virtual Sessions Available via Teledoc

GOVERNANCE

-  7 Out of 9 Independent Directors (78%)
-  3 Female Board Members
-  Performance-Based Executive Compensation Plan
-  Board Oversight of ESG
-  Zero Security Breaches



CORPORATE
GOVERNANCE

BOARD COMPOSITION AND QUALIFICATION STANDARDS

Switch currently has eight Board members, including six independent directors. 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 the Corporate Governance Guidelines Attachment A.

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 ESG OVERSIGHT

The Nominating and Corporate Governance committee provides oversight and guidance to management regarding Switch's environmental, social and governance program and initiatives, including matters related to climate-related risks and opportunities, human rights, diversity, and privacy and data security.



DIVERSITY POLICY AND ADDITIONAL SELECTION CRITERIA

Diversity of race, ethnicity, gender, age, cultural background or professional experience are 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, including the Audit Committee Chair.

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 document.

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

EXECUTIVE OFFICERS



Rob Roy
Founder, Chairman
and Chief Executive Officer (22 years)



Thomas Morton
President and Chief Legal Officer (13 years)



Gabe Nacht
Chief Financial Officer (7 years)



Melissa Young
Chief Information Officer (16 years)



Jonathan H. King
Chief Revenue Officer (1 year)



DIRECTORS



Rob Roy
Chairman of Board of Directors



Donald Snyder
Lead Independent Director,
Nominating & Corporate
Governance Committee Chair



Kimberly Sheehy
Director, Audit
Committee Chair



Bryan Wolf
Director,
Compensation
Committee Chair



Angela Archon
Director



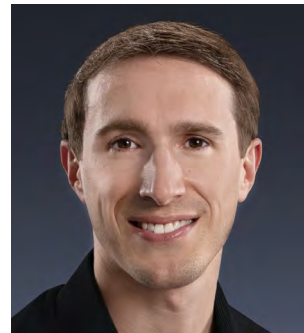
Liane Pelletier
Director



Zareh Sarrafian
Director



Tom Thomas
Director



Jason Genrich
Director

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.

	Nominating and Corporate Governance	Audit	Compensation
Angela Archon			
Liane Pelletier			
Zareh Sarrafian			
Kimberly Sheehy			
Donald Snyder			
Bryan Wolf			

= Chairperson = Member

AUDIT COMMITTEE

Switch has a standing Audit Committee. 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. This committee provides oversight and guidance to management concerning enterprise risk management, information technology system controls, and our ESG and Sustainability initiatives. 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.

INFORMATION TECHNOLOGY SYSTEM CONTROLS AND SECURITY OVERSIGHT

The Switch Board of Directors' Nominating and Corporate Governance Committee provides oversight and guidance to management regarding Switch's information technology system controls and security, including periodically reviewing Switch's cybersecurity and other information technology risks, controls, initiatives and action plans. Our data privacy and cybersecurity programs and policies cover all Switch business activities across all geographic locations in which we operate.

ESG OVERSIGHT AND BOARD MEMBER EXPERIENCE

The Nominating and Corporate Governance committee provides oversight and guidance to management regarding Switch's environmental, social and governance program and initiatives, including matters related to climate-related risks and opportunities, human rights, diversity, and privacy and data security.

Liane Pelletier: Ms. Pelletier is an NACD Board Leadership Fellow and has earned the NACD/ Carnegie Mellon Certificate in Cybersecurity Oversight. Ms. Pelletier is qualified to serve as a member of our Board based on her career in telecommunications, her experience in board practices around

cybersecurity, ERM, and ESG oversight as well as the breadth of her roles and leadership on matters like succession planning and shareholder engagement.

Donald Snyder: Mr. Snyder has served as Chairman of the Governance Committee for Western Alliance Bancorporation, a nationally chartered bank, listed on the NYSE, with assets over \$50 billion. In this role, he has been actively engaged in the effort to elevate the bank's ESG effectiveness and ratings and maintained primary ESG oversight for the Board. These efforts have included in-depth internal training sessions in the Governance Committee, facilitated with input from respected outside experts, including NACD, KPMG and outside legal counsel. His duties as Chairman of the bank's Governance Committee also include reporting to the full Board a summary of those Committee sessions. Mr. Snyder continues to read extensively on the subject of ESG, including articles produced by NACD and Bank Director Magazines.

Zareh Sarrafian: Mr. Sarrafian served as Chairman of the Governance committee of Pacific Premier Bancorp, Inc. since 2016, where he has engaged in consistent discussion and focus on ESG related topics, including training through trade organizations, Bank Directors, and NADC. In this role, Mr. Sarrafian has led an intentional effort to achieve diversification of the bank's board of directors, to reflect the uniqueness and diversity of its constituents and community. He has also provided valuable input toward office design and operations to incorporate efficient and clean energy use, natural resource conservation, and waste management.

COMPENSATION COMMITTEE

Switch has a standing Compensation Committee, which consists of Mses. Sheehy and Archon 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 AND PROCEDURES



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 aggressively 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 our Prime Campus locations. Switch continues to make aggressive efforts to procure and utilize clean sources of energy; including solar, wind, and geothermal resources to power its data center operations.

BUSINESS CASE FOR GOING 100% GREEN

Switch has always made sustainability a top priority and been an industry leader in this regard. Our commitment to sustainability leadership and 100% renewable energy is not only a social and environmental imperative, but also provides significant competitive advantages and cost savings for Switch.

Switch paid an "impact fee" of \$27 million to NV Energy. This enabled Switch to become an unbundled purchaser of energy in Nevada, allowing the company to pursue open-market alternatives for procuring and purchasing renewable power at a reduced cost. This additional flexibility in energy procurement allowed Switch to recoup its \$27 million impact fee expense within less than two years of operations, and has resulted in over \$47 million of total power-related cost savings as of December 2021.

2021 GOAL:

Net ZERO Scope 1 and Scope 2 Carbon Emissions

✓ ACHIEVED

2022 GOAL:

Aggressively targeting net ZERO Scope 1 and Scope 2 carbon emissions as we continue to grow our portfolio.

As this savings is shared with our clients, we believe our ability to offer 100% green energy compared to our peers provides a unique competitive advantage for Switch. As enterprise clients continue to focus more acutely on their own sustainability initiatives, we believe our market leadership in low-cost renewable power will prove to be increasingly critical in the years to come.

In addition to the ongoing competitive and financial benefits described above, Switch also receives energy efficiency rebates annually from our local utility providers. The company is able to qualify for these rebates because of the reduced energy usage associated with our patented and customized data center equipment, including air handling units, power distribution systems, and overall efficiency of our designs and processes.

“Improving the energy efficiency of our nation’s data centers has become more critical than ever as our digital economy expands. Switch’s data centers are among the most efficient in the industry, and we also commend the company for its use of renewable energy in powering its data centers.”

- Jean Lupinacci, Chief of the ENERGY STAR Commercial & Industrial Branch

CLIENT ECO-EFFICIENCY PROGRAM AND TRANSPARENCY

Switch's clients deploy their compute, server, storage and networking equipment into Switch's data centers, maintaining the ability to manage and operate their own equipment. Switch has little influence over the environmental profile of its clients' deployments, but make it a priority to provide clients with a variety of tools and data to manage their own energy use. Through Switch's Living Data Center portal, clients have access to both real-time and historical energy use, by server and by rack, inside Switch data centers. Our systems provide clients with real-time access to energy usage data for transparency and reporting purposes and clients can optimize their equipment and data processing requests to minimize energy use.



Switch provides its clients with a Sustainability Certificate for using 100% renewable energy within our technology 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.

“By moving our data center to a Switch facility that eliminates 265,000 carbon tons of emissions from the environment, we’re able to ensure our viewers can reliably stream The Handmaid’s Tale or Monday Night Football while moving towards green and sustainable operations with our data centers.”

- Hulu Tech Blog

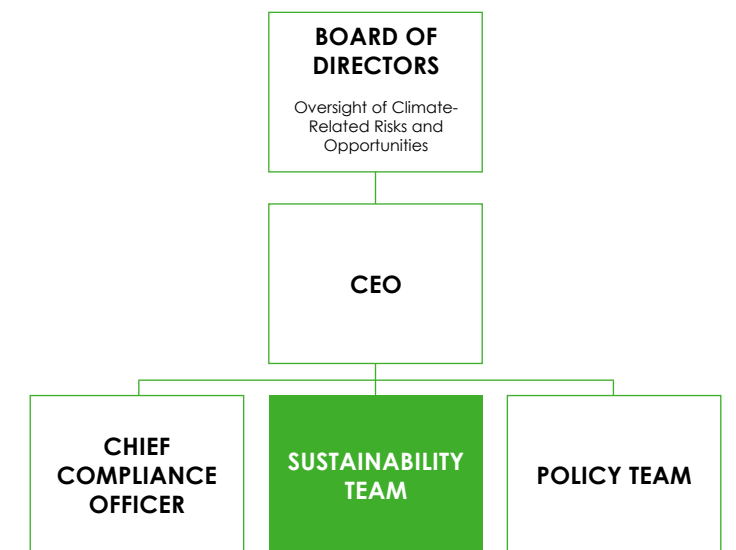
For sustainability press releases issued with our clients please [click here](#).

THE SUSTAINABILITY TEAM

Switch leads sustainability initiatives from the top. Under the direction and vision of our CEO, Switch's VP of Sustainability has developed the programs and practices we implement in support of sustainability. Team members within the Energy 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.

For policy-related risks, Switch's energy team - overseen by its VP of Sustainability - has two staff members dedicated to tracking, assessing, and as necessary implementing policies and programs related to climate change. These staff identify new threats and opportunities through participation in industry organizations, engagement with non-profits, active public policy work in data center communities, and engagement with our client-facing and investor-facing company teams. Issues and opportunities are raised as they arise to the Policy Team and at least annually through Switch's annual planning process during which resources are allocated for new initiatives and programs.

Climate-related policy risks sit alongside other important company matters such as data security, physical security, intellectual property protection, and other similar matters in the annual planning processes, and assessed in their materiality to the company as part of resource allocation decisions. When risks and opportunities are identified for action, the climate and energy program team is responsible for implementing programs as required. See Climate Risk Management section below for additional information.



WASTE DISPOSAL AND RECYCLING



Switch is committed to performing an annual review of its environmental impact of all business operations and will seek cost-effective ways to minimize our impact on the environment, which includes options for waste and recycling. As with GHG emissions and water, we pursue many opportunities to align our long-term financial interests with responsible waste disposal.

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.

Examples of our eco-friendly waste programs:

- E-waste is recycled through a third-party firm in accordance with applicable federal state and local regulations and within the guidelines of R2 (Responsible Recycling) and eStewards
- All used UPS/Generator batteries are recycled through an EPA certified third-party battery recycling company. This encompasses 100% of our hazardous waste generation
- We implemented a wood pallet recycling initiative that drove a significant reduction in our overall landfill waste volume
- We recycle all scrap wire and metal from our construction sites
- We leverage third-party software vendors to securely e-sign and process documents
- Recycling containers are provided throughout our offices and data center facilities for the disposal of recyclable waste
- All offices have shred bins for paper which is destroyed and recycled by a third-party
- 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” shop items are packaged in 100% recycled plastic

2021 GOAL:

Recycle 15% or more of total waste

✓ **ACHIEVED 2x TARGET**

2022 GOAL:

Recycle 30% or more of our business' total waste

Since 2019, our paper shredding and recycling program has preserved over 1,900 trees while saving an estimated 787,000 gallons of water and over 42,000 gallons of oil

We now measure and track all waste at each of our data center campus locations, including single stream recycling, secure paper shredding, electronic waste and battery recycling, municipal solid waste and construction waste. These tracking capabilities will enable us to better quantify the impacts of various process improvements and continue to improve the environmental sustainability of our operations.

Below is a table of quantitative metrics regarding our waste disposal and recycling program, covering all company operations across each of our data center campus locations.

WASTE DISPOSAL METRICS ¹	2019	2020	2021	YoYΔ
LANDFILL WASTE	1,558.4	837.9	811.2	(26.7)
RECYCLED MATERIALS				
SCRAP METAL	140.2	189.3	231.1	41.8
BATTERIES ²	22.5	109.1	33.3	(75.8)
CARDBOARD	74.9	60.6	93.5	32.9
PAPER	26.0	38.3	48.2	9.9
ELECTRONIC DEVICES	0.8	1.9	5.0	3.1
PLASTICS	2.4	0.6	1.6	1.0
ALUMINUM	1.3	0.7	1.0	0.3
TOTAL RECYCLING	268.3	400.5	413.8	13.3
TOTAL MEASURED WASTE	1,831.7	1,238.4	1,225.0	(13.4)
% OF TOTAL WASTE RECYCLED	15%	32%	34%	

¹ Volume measured in tons

² UPS/Generator batteries comprise 100% of hazardous waste

WATER CONSERVATION AND WATER RECYCLING

US Portfolio Average 2021 Water Usage Effectiveness (“WUE”) 1.46



Switch has demonstrated its commitment to a net positive water strategy by initiating investments that will more than completely balance its water use footprint. Our goal is to protect the world's most precious resources and to reduce the environmental impact in the communities where we do business. We estimate that during the coming decade, Switch will replenish and restore up to two times more water than it uses operationally.

- **NET POSITIVE WATER.** Switch's net positive water strategy through current projects under development will balance and restore its corporate water footprint indefinitely
- **WATER CONSERVATION TECHNOLOGY.** Proprietary water processing technology enables water reuse and eliminates chemicals from our cooling systems
- **EFFLUENT PIPELINE PROJECTS.** Switch identifies and leads water improvement projects in the communities where we operate to allow us to run our campuses on 100% recycled water

This project has many benefits to the community, environment and all parties involved:

- Reduction of nitrates that would otherwise be put into the Truckee River, protecting local wildlife and certain endangered species
- Elimination of a potential rate increase for consumers by deferring the cost of upgrades to the existing water treatment facility
- Increase of the municipal water treatment capacity for the cities of Reno and Sparks, enabling the construction of up to 25,000 additional homes

Nevada Governor Steve Sisolak's statement on Nevada's Regional Water Improvement Project:



"This is a true win-win project that will create hundreds of good jobs in the community, while at the same time providing important environmental sustainability outcomes that benefit the residents and businesses."

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

GOAL:

100% recycled water
at qualified locations

We estimate that during the coming decade, Switch will replenish and restore up to two times more water than it uses operationally

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 our data centers, 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 principle 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
- 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
- Be transparent and open in our communications about our efforts
- 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

To review our full Environmental Policy, [click here](#).

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.

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.

“Data runs the planet® and we want to ensure it doesn’t ruin the planet.”

- Rob Roy, Switch CEO and Founder



Switch's EVP of Construction leads the performance management of construction suppliers across the company's supply chain – with the

oversight of Switch's Founder and CEO Rob Roy. The construction team carefully 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 the confidential information and trade secrets of Switch and its clients. 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 interim inspection

to be conducted 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. This includes setting deadlines for remedial actions or improvements, as necessary.

To review our full Environmental Procurement Policy [click here](#).

CLIMATE RISK MANAGEMENT

We identify climate change and its impacts as a risk to our business, but also as an opportunity to gain a competitive advantage through innovation and a commitment to renewable energy. In assessing these risks and opportunities, we think about climate change in terms of how it affects our business and how we affect the environment.



We have identified five primary ways climate change might impact our business: **1) operating costs 2) site selection 3) client demand 4) water stress 5) natural disasters.**



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 powered – even as the company grows. In 2021 we worked aggressively to offset the emissions associated with our direct operations (Scope 1) by investing in third-party verified carbon reduction projects. Through the purchase of these carbon offsets and our 100% renewably powered operations, our Scope 1 & Scope 2 carbon footprint is net zero. Switch is committed to maintaining net zero operations annually.



2022 GOAL:
Net ZERO Scope 1
and Scope 2 Carbon
Emissions



2021 GOAL:
Maintain annual
Scope 1 emissions
below 10,000 metric
tons CO2 and Scope
2 emissions of zero
metric tons CO2

✓ **ACHIEVED**

PHYSICAL CLIMATE RISK MANAGEMENT PROGRAM



As a data center provider, the ability to effectively identify and manage operational and environmental risk is fundamental to Switch's core business and its reputation. 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 [implemented] throughout the company.

Physical Protection: Switch purpose-builds its data centers to enable full control of building design and construction and highly advanced protections against severe weather events. 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 that 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

- Switch has secured mission-critical status fuel delivery contracts to ensure that its fuel deliveries will take priority over the utility's other clients
- Switch's patented Redundant Data Center Roofing System (Switch Shield) is a dual, 200-mph-rated roofing system to mitigate extreme weather conditions. The system allows perpetual repair and replacement of the roof components without interrupting critical systems operations
- Switch's cooling system design allows the data center to be able to run indefinitely without water, has outside air pollutant detection, and is protective response enabled. All cooling water is located outside the data center building shell with no water permitted on or above data center floor



Switch has management processes to address both risks to our data centers arising from a changing climate (physical risks), and risks to our company stemming from policies and public sentiment related to climate change (policy risks). Neither of these processes are executed in isolation; both are part of larger company risk management processes.

Considering and mitigating the risks of extreme events (of all kinds) is a routine responsibility of Switch's planning, operations and executive teams including the current and future prevalence and risk of adverse impacts from natural disasters or severe weather events when selecting new data center locations. 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 EVP of Construction, 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.

T-SCIF



We refer to our patented 100% Hot Aisle Containment Row technology as the Switch Thermal Separate Compartment in Facility ("T-SCIF") or the Chimney Pod. The T-SCIF (Chimney Pod) creates a fully contained hot aisle between parallel rows of cabinets. The heat from the clients' equipment exhausts into the hot aisle, where it vents up into a hot-air plenum and out of the data center via extraction fans. Simultaneously, cold air is released from the overhead vents in the cold room into the intakes of the IT equipment in the cabinets, which cools the equipment. The exhausted hot air is never allowed to blend back into the cold room, which helps ensure that our clients' IT equipment operates in the correct environmental conditions. Using this cooling method, we are able to cool power levels that significantly exceed those of traditional data centers. Our ability to support these increased densities enables our clients to use and buy less cabinet space to house their equipment, which reduces the cost of their deployment and enhances energy efficiency.



ROB ROY'S GIGAWATT NEVADA



In 2015, Switch CEO and Founder had a vision to produce a Gigawatt of solar in Nevada. His vision was a project that will produce among the lowest priced solar power in the world and generate enough clean energy to power nearly one million homes. This vision became reality in 2018 when Switch announced and its partnership to begin development of one of the largest solar footprint and battery storage projects in the technology industry.

The project is the equivalent of removing the carbon from approximately 250,000 cars off the road and eliminating over 1.3 million carbon tons of emissions from the environment. This will generate enough clean energy to power over 200,000 homes.

This project was recently recognized as the 2019 Financial Investment of the Year by S&P Global Platts at its Global Energy Awards Event.



At completion, the projects that are underway will generate a total of 1 gigawatt of solar power and utilize 800 MWhs of battery storage. We expect to announce additional phases in the near future. The project drew praise from Nevada Governor, Steve Sisolak, as well as leading national renewable energy advocates.

“Nevada can enjoy the benefit of needed economic growth and strike a critical balance for the environment and precious natural resources. This project represents a major advancement for Nevada and we applaud Switch and their partners for continuing to push the envelope of sustainable business operations and renewable energy.”

- Rose McKinney-James, managing partner of Rose McKinney-James and Associates and Energy Works LLC and long-time clean energy proponent.



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. Switch also increased the 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. We wanted to ensure the sheer size of Switch's data centers and air handlers did not detrimentally impact the surrounding neighborhood.

To ensure this, Switch hired a third-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.

Previously, deployed air handler units were designed so that the compressors were not fully enclosed. 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 address this issue, 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 of approximately 95%.



HUMAN
CAPITAL

HUMAN RIGHTS STATEMENT

Switch's commitment to human rights is embodied in our core values of honesty, integrity and accountability, which form the basis of the Switch Culture Code. Switch takes seriously the importance of offering a workplace free of unlawful discrimination, harassment and retaliation. Our expectation is that all clients, employees, agents and business partners will be treated with respect and dignity, and that our interactions with others will be free from abuse, discrimination and corruption of all kinds. We do not tolerate forced or child labor, human trafficking or slavery in any form and are committed to the protection of minority groups and women's rights.

Our company policies, including our Employee Handbook and Switch **Business Code of Conduct** prohibit discrimination and outline our policies preventing unlawful discrimination, harassment and retaliation, and the numerous resources employees have if they wish to report any potential violations of these policies. Switch also conducts harassment training for all of its employees. All reports of potential violations of policy are promptly addressed by members of Switch's Human Resources and/or Legal department.



All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of brotherhood.

ARTICLE 1, UNIVERSAL DECLARATION OF HUMAN RIGHTS

WORKFORCE RIGHTS STATEMENT

In line with our values and an approach of fairness and social well-being for all employees, Switch maintains an open door policy and welcomes discussion regarding changes potentially affecting our employees, even where there is no obligation to do so.

Switch is committed to providing a fair living wage and fair working hours for all employees. We are dedicated to upholding the highest standards of occupation health and safety, and our policies encompass facility and operations in all regions.

Switch closely monitors its occupational health and safety (OH&S) performance including work related injuries, diseases and fatalities.

OH&S PERFORMANCE METRICS	2017	2018	2019	2020	2021
WORK-RELATED INJURIES	8	4	4	5	4
OCCUPATIONAL DISEASES	0	0	0	0	0
FATALITIES	0	0	0	0	0



Switch believes in promoting the health of our employees and their families and provides a comprehensive non-salary benefits package.

MEDICAL AND DENTAL INSURANCE	All premiums paid for employees, their families and/or domestic partners
LIFE AND AD&D INSURANCE	Paid by Switch with voluntary supplemental available
401(K) PLAN	Comprehensive 401(k) plan and Safe Harbor employer matching
MEALS DURING WORKING HOURS	100% paid by Switch
GYM MEMBERSHIP	Reimbursed by Switch

The full list of Switch benefits can be found [here](#).

COMMITMENT TO DIVERSITY, EQUITY, AND INCLUSION

Switch's DEI Policy



Switch was founded on the principle of KARMA and is committed to fostering a culture of diversity, equity and inclusion. We value talent, innovation, passion, and intelligence as Switch's most valuable assets. These assets shape our company culture, reputation, and achievement and are dependent upon the varying perspectives, life experiences, backgrounds, and abilities of our employees.

We embrace and encourage our employees' differentiated insights, including those enriched by gender, gender expression, age, race, religion, color, ethnicity, disability, family or marital status, national origin, physical or mental ability, political affiliation, sexual orientation, socio-economic status, veteran status, and all other characteristics that make our employees unique. To reinforce our commitment to diversity, equity, and inclusion, all team members are required to complete annual diversity awareness training. In addition, Switch formed a Diversity Council that is chaired by our President and Chief Legal Officer and led by our VP of Human Resources.

The council oversees diversity initiatives such as: 1) Raising awareness about the value of a diverse workforce; 2) Partnering with business units to drive diversity strategies and goals, develop business unit-specific tactics, report outcomes and celebrate successes; 3) Promoting key internal and external diversity programs and determining accountability for recruiting, training, developing and retaining diverse talent; 4) Raising awareness about the importance of community outreach and the inclusion of diverse suppliers in our procurement process; and 5) Sharing information and analytics about the clear relationship between diversity and business performance.

[Click here](#) to view the full policy.

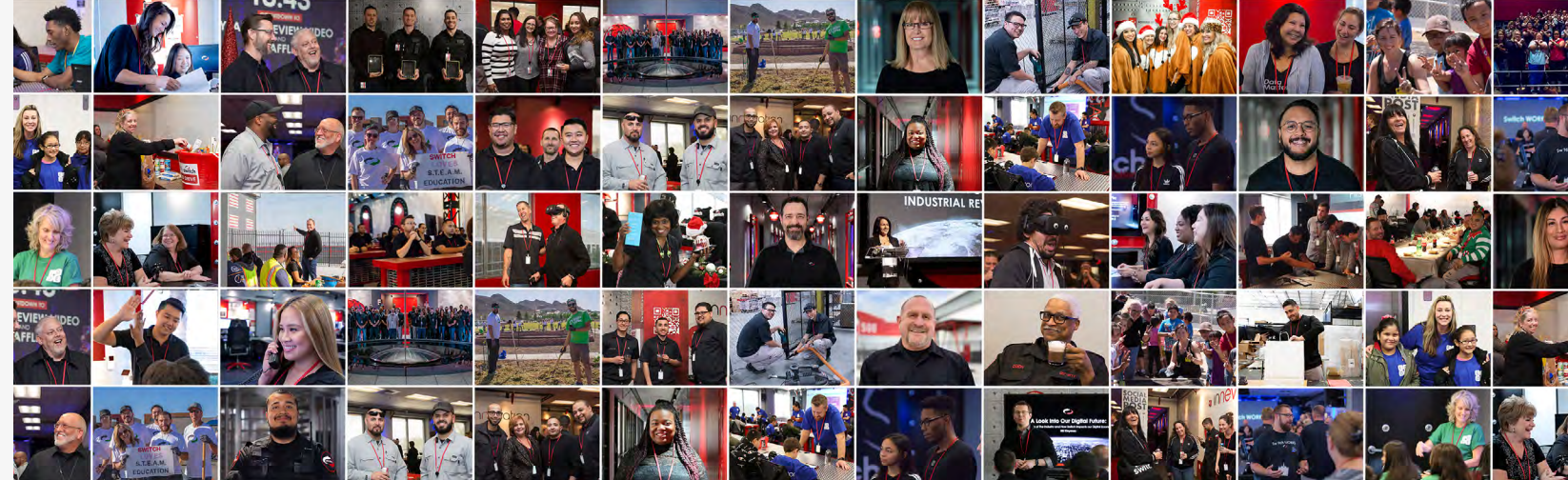
WORKFORCE DIVERSITY METRICS	2018	2019	2020	2021
ANNUAL EMPLOYEE TURNOVER PERCENTAGE	17%	16%	15%	20%
NUMBER OF WOMEN IN WORKFORCE	138	153	154	158
WOMEN AS A PERCENTAGE OF TOTAL WORKFORCE	19%	19%	20%	21%
NUMBER OF WOMEN IN SENIOR MANAGEMENT ¹	15	21	20	20
NUMBER OF WOMEN IN EXECUTIVE MANAGEMENT ²	8	7	10	10
TOTAL NUMBER OF NEW HIRES	131	179	88	135
NUMBER OF WOMEN NEWLY HIRED	37	45	17	36
AVERAGE YEARS EMPLOYED (FEMALES)	2.8	3.0	3.9	4.1
AVERAGE YEARS EMPLOYED (MALES)	3.6	3.9	4.5	5.0
NUMBER OF ETHNIC MINORITY EMPLOYEES	240	245	291	290
ETHNIC MINORITIES AS A PERCENTAGE OF TOTAL WORKFORCE	33%	31%	40%	42%

¹ Includes VP and above ² Includes SVP and above ³ Total headcount at year end 2021 was 741. Metrics presented exclude Data Foundry in 2021.



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.

Workforce diversity is critical to success at Switch because it empowers us to deliver superior client service, attract and retain talented employees, 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.



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, or 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.

GENDER PAY STATISTICS ¹	2019	2020	2021
ANNUAL COMPENSATION PER EMPLOYEE	\$87,264	\$95,821	\$90,041
ANNUAL COMPENSATION PER FEMALE EMPLOYEE	\$96,700	\$104,143	\$96,202
ANNUAL COMPENSATION PER MALE EMPLOYEE	\$84,986	\$93,717	\$88,452

¹ Compensation data reflects base salary and bonus for all full-time employees

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 25% of our full-time staff, the majority of whom work within our Security Operations team.

Veterans comprise 71% of our security staff and 27% of our overall workforce

BUSINESS PARTNER GUIDELINES

Switch is committed to maintaining the highest standards of conduct, and we follow the mantra that if you put good energy out, good energy will return. We rely on our vendors and service providers to support this commitment. These Business Partner Guidelines (these "Guidelines") apply to all Switch business partner relationships, including vendors, contractors, resellers, consultants, suppliers and service providers, and each of their employees, agents and subcontractors (each, and collectively, a "Provider").

Switch is dedicated to working with partners and service providers who share our fundamental values and demonstrate their own commitment to promoting individual human rights. We expect our Representatives to treat their employees, agents, clients and business partners with respect and dignity, free from abuse, harassment or discrimination based on any status, condition or category protected by law. Providers must fully comply with all applicable labor, health and safety, anti-discrimination, anti-retaliation and other workplace laws, including those addressing equal pay, child labor, forced labor, slavery and human trafficking, and wage and hour laws.

Prior to onboarding new business partners, applicants are expected to review and attest to the Switch Business Partner Guidelines, which is inclusive of our Human Rights Statement and Code of Business Conduct and Ethics.

Click here to view the full policy.



SMALL AND DIVERSE SUPPLIERS

Switch is also committed to providing opportunities for qualified businesses owned by people of diverse backgrounds to participate synergistically with our company. Of our current list of providers 15% are qualified as a small or diverse business. We continue to encourage diversity by engaging a broad range of business partners, and sourcing goods and services from the communities we serve whenever possible.

Of our current list of providers, 15% are qualified as a small or diverse business

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 Hawaii. 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.

EMPLOYEE ENGAGEMENT SURVEY

In the fourth quarter of 2021, Switch conducted its semi-annual Pulse Survey which offers all employees an opportunity to anonymously provide feedback to measure their satisfaction and recognition of value at Switch. The scoring is measured based on responses to the following statements: 1) I feel valued for my contributions to the company; and 2) I am happy working at Switch. In the Q4 2021 survey, 91% of participants responded with "strongly agree", "agree", or "neutral" on Statement #1, and 96% on Statement #2. The overall response rate was 57% on this initial survey.

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.



PARTNERSHIPS FOR TALENT PIPELINE DEVELOPMENT AND RECRUITMENT

Switch has partnered with universities and community colleges to develop curricula 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 (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.



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. Switch also donated equipment to the Truckee Meadows Community College training program for data center engineering technicians in anticipation of the workforce demands of 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

New Hire Orientation

The importance of delivering an impactful New Hire Orientation and onboarding experience cannot be overstated, 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.

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. Our team members collectively logged over 25,000 training hours last year, equating to more than 30 hours per employee.

In 2021, training programs were offered and taken by 100% of Switch's full-time employees

Client Support Team Training

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 intuitively 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.

Grievance Reporting and Escalation Procedures

Switch promotes an open feedback culture through the use of our anonymous online feedback tool, the Switch Feedback Portal. The portal is monitored by the Switch Feedback Committee, a group of team members representing various departments across the company. Switch is committed to conducting business in accordance with the highest ethical standards. Consistent with those standards, we encourage employees to discuss grievances, complaints, suggestions or questions with their supervisor or human resources. In certain cases, team members may report grievances directly to a Switch executive to begin escalation procedures. Team members can utilize this open-door policy for reports and ideas that are not addressed through the Company's specific reporting procedures. In addition to these resources, Switch has also established a confidential ethics hotline through a third-party contractor.

Weight Loss and Wellness

Premier Physicians Weight Loss and Wellness provides certain health care services to team members, spouses and dependent.

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.**

Work/Life Balance and PTO

Switch encourages its team members to maintain a healthy work/life balance which we believe promotes high employee satisfaction and maximizes productivity while at work. In accordance with this belief, the company provides all full-time and part-time employees with an attractive Paid Time Off ("PTO") benefit package. PTO may be used for vacation, personal time, personal illness, or any other reason. PTO accrual starts immediately at a rate based on length of service per calendar year. First year employees are given a maximum of 11 PTO days per year while more tenured employees may receive up to a maximum of 31 days per year, and employees can opt to rollover up to 80 hours (10 work days) to the following calendar year if not used. Switch offers nine customary holidays per year, as well as two additional "floating holidays" that can be taken on any date of the employee's choosing.

Teledoc Mental Health Program

Switch's paid mental health program provides access to specialists who provide mental health consultations to members. The program offers members ongoing access to mental diagnostic services, talk therapy and prescription medication management.

"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.

Paid Maternity Leave

Switch pays for Maternity Pay for mothers recovering from labor/delivery.



Switch INSIDER
LATEST NEWS INSIDE Switch

FEATURED NEWS

FEEDBACK PORTAL

Check Out the New and Improved Feedback Portal!

Switch SHOUTOUTS

TEAM MEMBER ENGAGEMENT

Switch INSIDER

Switch's internal communications platform, Switch INSIDER, is designed to drive engagement by providing real time communication with our team members. 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 events are recorded and shared with team members who cannot attend in person. Previous topics include energy & sustainability, mental health and tips for parenting during a pandemic.

Appreciation Celebrations

Every year in March, Switch team members are recognized on Employee Appreciation Day with a gift card. To further show appreciation, the Switch Engagement team organizes annual holiday celebrations where every team member 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 and recognized on our internal communications platform, Switch INSIDER. Many of our departments also hold monthly group birthday celebrations.

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.

The Life Muse Leadership Development Program had 32 graduates in 2021, bringing the total to 72 since the program's inception. In an effort to help team members relieve stress, find peace, and practice mindfulness, Switch launched the Virtual Wellness Center available to all employees. This provides team members with resources to improve physical and mental health and wellness. Examples of webinars and articles provided included:

- Mental Health Awareness
- 5 Activities to Improve Your Mental Health
- 6 Science-Based Benefits of Meditation
- Experience the Healing Powers of Journaling
- Improve Your Health with Exercise and Movement

Meal Program

During any on-site 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.

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.

Employee Assistance Program

Employee Assistance Program (EAP) is a confidential, voluntary service that provides professional counseling and referral services designed to help our employees and their family members with personal, job or family related problems. EAP can help employees and their family members identify,

resolve, and gain control over personal problems that may be interfering with work and daily life. EAP offers various free or nominally priced services. The dedicated toll free crisis line and available 24/7/365. With the counseling service, EAP gives 3 free face to face visits for each member of your family (that means, 3 face to face for each issue and for each person).

MENTORSHIP PROGRAMS

FIRST® Robotics



One of the STEAM-based organizations that Switch regularly supports, FIRST® (For Inspiration and Recognition of Science and Technology), 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.

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%-21%. Average employee turnover across the Technology industry was approximately 21% according to the 2018 Mercer U.S. Turnover Survey. Since 2012, our employee turnover rate has never been above 21% in any single year.

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 AND 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, this ensures that they 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 for criteria specific to each individual's role, and is 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. Any innovative ideas and challenge/solution scenarios are reviewed by an internal committee.



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.



Girl Scouts of Southern Nevada

Switch regularly sponsors the Girl Scouts of Nevada. In 2021 the organization awarded our own SVP of Corporate Development and Public Sector, Betsy Fretwell, with the Citizen Scientist Badge for being an outstanding female leader in the Las Vegas community.



ArtPrize

Switch is a 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.



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.



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. In 2021, UNLV Athletics partnered with Switch to advance student-athlete excellence and cross campus collaboration.



Green our Planet

Switch is a 2021 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 benefiting, 3,000+ teachers actively using their STEAM curriculum, a 200+ student farmer's market, and 1,200 teachers trained.



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



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 clients

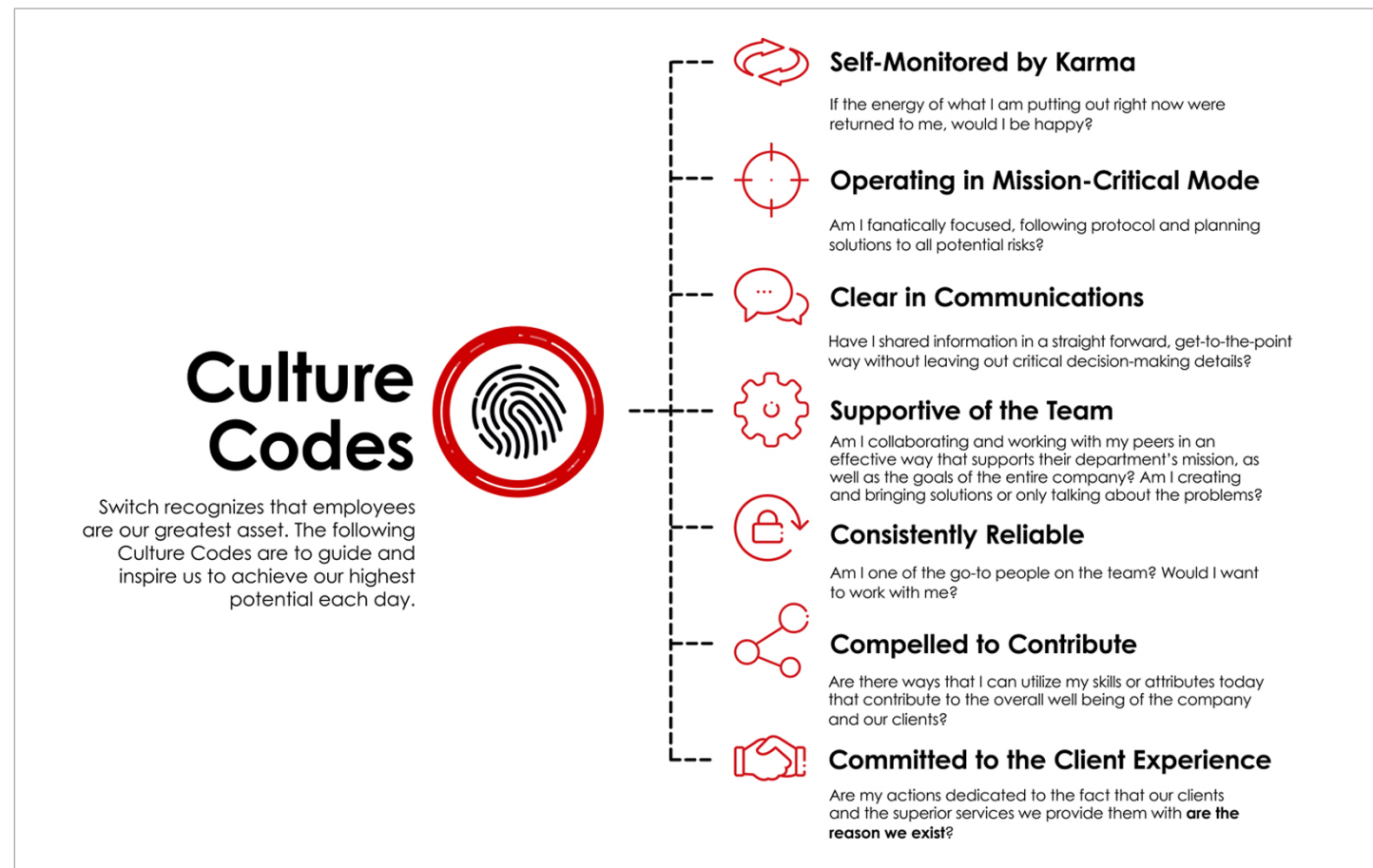
Oversight and Ethical Risk Assessments

Switch's 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 to discuss 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.



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, client 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's 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.

In addition to regular review of the questionnaires, Internal Audit annually audits the Switch Handbook which is inclusive of all of Switch's ethical standards and anti-corruption policies. Internal Audit also performs annual audits of entity level controls as part of the SOX audit inclusive of ethical standard controls. Beyond annual SOX and Switch Handbook audits, Internal Audit includes all operations into consideration when performing their annual financial risk assessment which drives the audit scope for the year.

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 itself. 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 POLICIES

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 government affairs team in accordance with the policy directive. Under the direction and vision of our CEO, Switch's EVP of Strategy develops 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.

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, Georgia and Texas 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 requirement in each jurisdiction which currently is the Nevada Revised Statutes, Georgia Ethics in Government Act, the Michigan Lobbying Disclosure Act 1995.

All lobbying activities are executed through the government affairs team, led by the VP of Public and Government Affairs. All practices we implement in support of the policy are under the direction of our CEO and President in accordance with the policy directive.

DATA PRIVACY AND 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.

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 client 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.

DATA PRIVACY & SECURITY PROGRAMS AND POLICIES

What we do: Switch is a colocation data center provider. Colocation data centers provide a shared physical environment for enterprise clients to “co-locate” their mission critical IT infrastructure. Our business operations entail the provision of space, power, cooling, and physical security for the servers, storage arrays, and networking equipment owned and operated by our clients. In addition to colocation services, Switch also provides access to a variety of telecommunications and network service providers at a minimum cost and complexity.

What we do not do: Switch does not manage, maintain, control, or have visibility to the data residing on its clients' servers or data transmitted to/from the telecommunications networks connected to our data centers. Moreover, Switch does not directly engage in the provision of cloud services, managed hosting, software, or logical security services that may involve the collection of, or responsibility for client data. As such, our contracts stipulate that clients shall maintain full right of access, rectification, and deletion of their data at all times.

Switch has several programs and policies in place related to data security and the protection and privacy of client data.

MONITORING AND RESPONSE PROTOCOL FOR DATA BREACHES & CYBERATTACKS

Security Breach Disclosure: Switch has experienced ZERO breaches in security since its founding in 2000.

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:

- | | |
|-------------------------------------|---------------------------------|
| 1. Denial of service | 8. Leakage in appropriate usage |
| 2. Malicious code | 9. Environmental/external |
| 3. Unauthorized access | 10. Business model |
| 4. Compromised asset or information | 11. Leadership changes |
| 5. Social engineering | 12. Third party |
| 6. Internal/external hacking | 13. Fraud |
| 7. Unauthorized data | |

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 client 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.

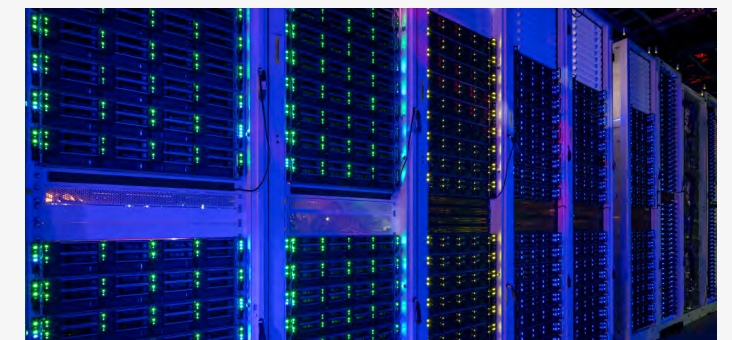
Vulnerability Management

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

Cybersecurity Program Plan (CSPP)

The Switch Cyber Security 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 notifying data subjects (including client representatives and Switch employees) in a timely manner with respect to policy changes and/or any known incidents regarding the breach of client 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/>



OPERATIONS

AND 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 maintains 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 clients, 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.

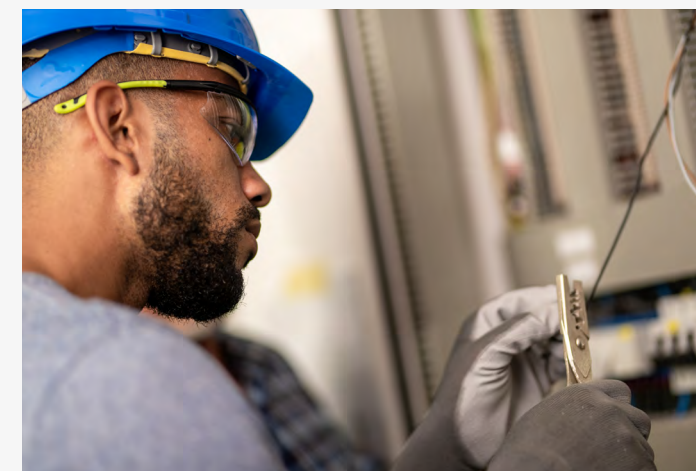
Before policies and procedures are published and/or amended, they must be reviewed by the SVP of Data Center Operations and other members of senior management. This is to ensure all maintenance practices remain within manufacturers recommended maintenance practices, and meet or exceed industry standards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



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 clients' critical load to a backup generator. This is a controlled (i.e. "closed") transfer, meaning that no loss of power occurs during the test.

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).



TASK FORCE ON CLIMATE-RELATED DISCLOSURES



As part of our pledge to meet the recommendations of the Task Force on Climate-related Disclosures (TCFD), we have addressed four recommended topics in this report: Governance, Strategy, Risk Management, and Metrics and Targets.

- **Governance:** Our governance is common across Environmental, Social, and Governance topics, and is addressed in our Investor Relations website under "Governance Documents." Additionally, our leadership's role in driving strategy, risk management, and setting targets is addressed in our "Sustainability Team" section.
- **Strategy:** Our company-wide environmental strategy is described in the "Sustainability" section of this report. We address climate risks in the "Climate Risk Management" section. We also describe examples of our strategies including exiting NV Energy to manage financial risk in our "Business Case for Going 100% Green" and "Water Conservation and Water Recycling Program" subsections of the "Sustainability" portion of this report.

- **Risk Management:** We disclose our processes for identifying, assessing, and managing climate-related risks in our "Climate Risk Management" section and its subsequent subsections including "GHG Reduction Program," "GHG Risk Management Program," and "Physical Climate Risk Management Program." The subsections detail identification of primary climate-related risks for Switch and how we address those risks.
- **Metrics and Targets:** Our metrics and targets used to assess and manage relevant climate-related risks and opportunities are disclosed in our SASB/TCFD index in the Appendix of this report. Additionally, we disclose targets that we use to manage climate-related risks in the "Sustainability" section of this report.

GRI 102: General Disclosures	
SASB - Activity Metrics	
TCFD - Governance	
Disclosure Number and Title	2022 Response
102-1 Name of the organization	Switch Inc. (NYSE: SWCH)
102-2 Activities, brands, products, and services	Switch is a technology infrastructure corporation that provides data center colocation, telecommunications, interconnection, and professional services to enterprise clients.
102-3 Location of headquarters	7135 S. Decatur Boulevard, Las Vegas, NV 89118, USA
102-4 Location of operations	Switch operates 12 data centers across five U.S. campus locations, also referred to as the Switch "Primes". These locations include Las Vegas, NV, Tahoe Reno, NV, Grand Rapids, MI, Atlanta, GA, and Austin/Houston, TX.
102-5 Ownership and legal form	Switch is structured as an "Up-C" corporation, whose Class A shares are publicly listed on the New York Stock Exchange.
102-6 Markets served	Through its strategically located Prime Campus locations, Switch serves more than 1300 enterprise clients headquartered throughout the United States and abroad.
102-7 Scale of the organization	For the year ended December 31, 2021, Switch generated revenues of \$592 million and had an equity market capitalization of approximately \$6.6 billion. Our data center facilities totaled 5.09 million gross square feet (GSF) and 508 megawatts of IT load.
SASB IF-RE-000.A – Number of assets, by property sector	16 – Property Subsector; FTSE Nareit Data Centers
SASB IF-RE-000.B – Leasable floor area, by property subsector	2.2 million sq. ft.
SASB IF-RE-000.C – Percentage of indirectly managed assets, by property subsector	0%
SASB IF-RE-000.D – Average occupancy rate, by property subsector	90.6%
102-8 Information on employees and other workers	As of December 31, 2021, Switch had 829 employees, up from 759 employees the prior year. We collaborate with the local unions where applicable, such as construction and the trades; however, none of our direct employees are represented by a labor union or covered by a collective bargaining agreement. We believe our employee relations are good and we have not experienced any work stoppages. Page 38 Human Capital Metrics
102-9 Supply chain	While the majority of the design and construction of our data centers and related infrastructure is performed by Switch's own general contractor, we do rely on select third-party suppliers for labor and materials during construction. Our products and infrastructure rely on third-party service providers. In particular, we depend on third parties to provide Internet, telecommunications and fiber optic network connectivity to the clients in our data centers. Link to Supplier Code of Conduct.
102-10 Significant changes to the organization and its supply chain since last report	In June 2021, we acquired all of the equity interests in Data Foundry and certain real property interests used in connection with Data Foundry's operations, which included four operating data centers designed to include up to approximately 430,000 GSF of space and have up to 22 MW of 100% renewable power available to the facilities. No other significant changes have been made to Switch's operations or supply chain in recent periods.
102-12 External initiatives	Energy Star Data Center Rating Program GHG Verification with Ruby Canyon
102-13 Membership of associations	UN Global Compact
102-14 Statement from senior decision-maker	See CEO letter. Page 2
102-15 Key impacts, risks, and opportunities	2021 Form 10-K , section entitled "risk factors"
102-16 Values, principles, standards, and norms of behavior	Business Ethics Program Page 53
102-17 Mechanisms for advice and concerns about ethics	Business Ethics Program & Whistleblower Programs Page 53 & Page 57
102-18 Governance structure	See Nominating and Corporate Governance Committee Charter. Page 20
102-19 Delegating authority	The highest level of governance is at the Board level. See Nominating and Corporate Governance Committee Charter.

102-20 Executive-level responsibility for ESG topics	The highest level of ESG oversight is at the Board level. A) See Nominating and Corporate Governance Committee Charter. B) 2021 ESG Report "The Sustainability Team" on page 25.
TCFD – Governance A) Disclose the Board's oversight of climate-related risks and opportunities	
TCFD – Governance B) Describe the management's role in assessing and managing climate-related risks and opportunities	
102-22 Composition of highest governance body and its committees	2021 Proxy Statement
102-23 Chair of the highest governance body	2021 Proxy Statement
102-24 Nominating and selecting the highest governance body	2021 Proxy Statement
102-25 Conflicts of interest	Corporate Governance Guidelines
102-26 Role of highest governance body in setting purpose, values, and strategy	Corporate Governance Guidelines
102-27 Collective knowledge of highest governance body	Corporate Governance Guidelines Page 18 for bios of our Board of Directors
102-28 Evaluating the highest governance body's performance	Corporate Governance Guidelines (evaluations process)
102-29 Identifying and managing economic, environmental, and social impacts	The highest level of ESG oversight is at the Board level. See Nominating and Corporate Governance Committee Charter.
102-30 Effectiveness of risk management processes	2021 Proxy Statement
102-31 Review of economic, environmental and social topics	The highest level of ESG oversight is at the Board level. See Nominating and Corporate Governance Committee Charter.
102-32 Highest governance body's role in sustainability reporting	The highest level of ESG oversight is at the Board level. See Nominating and Corporate Governance Committee Charter.
102-33 Communicating critical concerns	Code of Business Conduct and Ethics
102-35 Remuneration policies	2021 Proxy Statement
102-36 Process for determining remuneration	Compensation Committee Charter
102-41 Collective bargaining agreements	0% of total employees are covered by a collective bargaining agreement.
102-45 Entities included in consolidated financial statements	2021 Form 10-K
102-46 Defining report content and topic boundaries	See our "Third Party Approach" section on page 8.
102-48 Restatements of information	There have been no restatements.
102-50 Reporting period	The 2021 ESG Report presents information focused primarily on activities spanning the 2021 calendar year, except where otherwise indicated.
102-51 Date of most recent report	The 2021 ESG Report was published in April 2022.
102-52 Reporting cycle	Reports are generated annually.
102-53 Contact point for questions regarding the report	Alise Porto, VP of Sustainability Matt Heinz, VP of Investor Relations Vicky Faust, Director Strategic Business Planning Email the team: ESG@switch.com
102-54 Claims of reporting in accordance with the GRI Standards	This report has been prepared in accordance with GRI Standards: Core option.

102-55 GRI content index	Included in this section.
GRI 201: Economic Performance	
TCFD - Strategy	
Disclosure Number and Title	2022 Response
201-1 Direct economic value generated and distributed	2021 Form 10-K
201-2 Financial implications and other risks and opportunities due to climate change	See Climate Risk section.
TCFD – Strategy B) Describe the impact of climate-related risks and opportunities on the organization’s businesses, strategy, and financial planning	2021 ESG Report “Sustainability” Section and “Business Case for Going 100% Green” and “Water Conservation & Water Recycling” subsections
201-3 Defined benefit plan obligations and other retirement plans	2021 Form 10-K
TCFD – Strategy C) Describe the resilience of the organization’s strategy, taking into consideration different climate-related scenarios, including a 2°C or lower scenario.	2021 ESG Report “Sustainability” Section and “Physical Climate Risk Management” subsection
GRI 205: Anti-corruption	
Disclosure Number and Title	2022 Response
205-1 Operations assessed for risks related to corruption	Business Ethics Program
205-2 Communication and training about anti-corruption policies and procedures	Business Ethics Program
GRI 301: Materials	
Disclosure Number and Title	2022 Response
301-2 Recycled input materials used	Waste Disposal and Recycling
GRI 302: Energy	
SASB – Energy Management	
TCFD - Metrics & Targets	
Disclosure Number and Title	2022 Response
302-1 Energy consumption within the organization	Emissions and Power Usage Data
TCFD - Metrics & Targets A) Disclose the metrics used by the organization to assess climate-related risks and opportunities in line with its strategy and risk management process	
SASB IF-RE-130a.1	100% – Property Subsector: FTSE Nareit Data Centers
SASB IF-RE-130a.2	(1) 972,328 MWh
(1) Total energy consumed by portfolio area with data coverage,	(2) 100% grid electricity
(2) percentage grid electricity,	(3) 100% renewable
(3) percentage renewable, by property subsector	
SASB IF-RE-130a.3	+20.7%
Like-for-like percentage change in energy consumption for the portfolio area with data coverage, by property subsector	

SASB IF-RE-130a.4	(1) 72%
Percentage of eligible portfolio that:	(2) 72%
(1) has an energy rating	
(2) is certified to ENERGY STAR, by property subsector	
SASB IF-RE-130a.5	2021 ESG Report “Physical Climate Risk Management Program” (pp. 32)
Description of how building energy management considerations are integrated into property investment analysis and operational strategy	
GRI 303: Water and Effluents	
SASB – Water Management	
SASB IF-RE-140a.1	(1) 100%
Water withdrawal data coverage as a percentage of:	(2) 33%
(1) total floor area	
(2) floor area in regions with high / extremely high baseline water stress	
303-1 Interactions with water as a shared resource	2021 ESG Report “Water Conservation & Water Recycling” and “Physical Climate Risk Management Program” (pp. 28 and 32)
303-2 Management of water discharge-related impacts	2021 ESG Report “Water Conservation & Water Recycling” and “Physical Climate Risk Management Program” (pp. 28 and 32)
303-3 Water withdrawal, 303-5 Water consumption, SASB IF-RE-140a.2	(1) 1.47 million m3
(1) Total water withdrawn by portfolio area with data coverage	(2) 46.8%
(2) percentage in regions with high / extremely high baseline water stress, by property subsector	
SASB IF-RE-140a.3	15.2%
Like-for-like percentage change in water withdrawn for portfolio area with data coverage, by property subsector	
SASB IF-RE-140a.4	2021 ESG Report “Water Conservation & Water Recycling” and “Physical Climate Risk Management Program” (pp. 28 and 32)
Description of water management risks and discussion of strategies and practices to mitigate those risks	
GRI 305: Emissions	
TCFD - Risk Management	
TCFD - Metrics & Targets	
Disclosure Number and Title	2022 Response
305-1 Direct (Scope 1) GHG emissions,	Emissions and Power Usage Data
TCFD – Metrics & Targets B) Disclose Scope 1, Scope 2, and if appropriate, Scope 3 greenhouse gas (GHG) emissions and the related risks	
305-2 Energy indirect (Scope 2) GHG	Emissions and Power Usage Data
TCFD – Metrics & Targets B) Disclose Scope 1, Scope 2, and if appropriate, Scope 3 greenhouse gas (GHG) emissions and the related risks	

305-5 Reduction of GHG emissions	Emissions and Power Usage Data
TCFD – Risk Management B) Describe the organization’s processes for managing climate-related risks	2021 ESG Report “Sustainability” section, “Climate Risk Management,” “GHG Reduction Program,” “GHG Risk Management Program” subsections
TCFD – Metrics & Targets C) Describe the targets used by the organization to manage climate-related risks and opportunities and performance against targets	2021 ESG Report “Sustainability” section, “Climate Risk Management” and “Targets” subsections on page 23 and 30
GRI 306: Waste	
Disclosure Number and Title	2022 Response
306-1 Waste generation and significant waste-related impacts	Waste Disposal and Recycling
306-2 Management of significant waste-related impacts	Waste Disposal and Recycling
306-3 Waste generated	Waste Disposal and Recycling
306-4 Waste diverted from disposal	Waste Disposal and Recycling
306-5 Waste directed to disposal	Waste Disposal and Recycling
SASB – Management of Tenant Sustainability Impacts	
Disclosure Number and Title	2022 Response
SASB IF-RE-410a.1	(1) 0% (2) 0 sq. ft.
(1) Percentage of new leases that contain a cost recovery clause for resource efficiency-related capital improvements (2) Associated leased floor area, by property subsector	
SASB IF-RE-410a.2	(1) 0% (2) 0%
Percentage of tenants separately metered or submetered for: (1) Grid electricity consumption (2) Water withdrawals, by property sector	
SASB IF-RE-410a.3	2021 ESG Report “Sustainability” (pp. 23) and “Client Eco-Efficiency Program and Transparency” (pp. 24)
Discussion of approach to measuring, incentivizing, and improving sustainability impact of tenants	
SASB – Climate Change Adaptation	
TCFD – Strategy	
TCFD – Risk Management	
Disclosure Number and Title	2022 Response
SASB IF-RE-450a.1	0 sq. ft.
Area of properties located in 100-year flood zones, by property subsector	
SASB IF-RE-450a.2	2021 ESG Report “Climate Risk Management” (pp. 30)
Description of climate change risk exposure analysis, degree of systematic portfolio exposure, and of strategies for mitigating risks	
TCFD - Strategy A) Describe the climate related-risks and opportunities the organization has identified over the short, medium, and long term	

TCFD – Risk Management A) Describe the organization’s processes for identifying and assessing climate-related risks	2021 ESG Report “Sustainability” section and “Climate Risk Management” subsection (pp. 23 and 30)
TCFD – Risk Management C) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organizations overall risk management	
GRI 401: Employment (containing Standard Interpretation 1)	
Disclosure Number and Title	2022 Response
401-1 New employee hires and employee turnover	Workforce Metrics
GRI 403: Occupational Health and Safety	
Disclosure Number and Title	2022 Response
403-2 Hazard identification, risk assessment, and incident investigation	Operations and Safety Program
403-3 Occupational health services	Operations and Safety Program
403-4 Worker participation, consultation, and communication on occupational health and safety	Operations and Safety Program
403-5 Worker training on occupational health and safety	Operations and Safety Program
403-6 Promotion of worker health	Operations and Safety Program Onsite Wellness Program: Life Muse
403-9 Work-related injuries	Workforce Rights OS&H Performance Metrics – 2021 Number of Work-related Injuries: 4 Number of Occupational Diseases: 0 Number of Fatalities: 0
403-10 Work-related ill health	Workforce Rights OS&H Performance Metrics – 2021 Number of Work-related Injuries: 4 Number of Occupational Diseases: 0 Number of Fatalities: 0
GRI 404: Training and Education	
Disclosure Number and Title	2022 Response
404-1 Average hours of training per year per employee	Talent Development Our team members collectively logged over 25,000 training hours last year, equating to more than 30 hours per employee.
404-2 Programs for upgrading employee skills and transition assistance programs	Talent Development
404-3 Percentage of employees receiving regular performance and career development reviews	Performance Management and Training – 100% of employees receive regular performance reviews.

405: Diversity and Equal Opportunity	
Disclosure Number and Title	2022 Response
405-1 Diversity of governance bodies and employees	Diversity, Equity and Inclusion
405-2 Ratio of basic salary and remuneration of women to men	Diversity, Equity and Inclusion
GRI 406: Non-discrimination	
Disclosure Number and Title	2022 Response
406-1 Incidents of discrimination and corrective actions taken	0 incidents of discrimination
GRI 413: Local Communities	
Disclosure Number and Title	2022 Response
413-1 Operations with local community engagement, impact assessments, and development programs	Community Involvement
413-2 Operations with significant actual and potential negative impacts on local communities	Community Involvement
GRI 417: Marketing and Labeling	
Disclosure Number and Title	2022 Response
417-1 Requirements for product and service information and labeling	Client Eco-Efficiency Program and Transparency





**Data runs the planet[®] and I believe
that it should not ruin the planet.**

-Rob Roy - Chairman, CEO & Founder