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2023 marked another milestone year for Switch, underscored by our relentless pursuit of expansion, efficiency and evolution.

With the steadfast backing of Digital Bridge & IFM, we have emerged as a leader in AI, cloud and enterprise infrastructure.

Switch’s vision remains clear, to sustainably power the future of the connected world. We aim to provide the most secure, energy-efficient ecosystems that not only drive digital commerce but also enhance human productivity and economic prosperity.

Our team’s dedication has earned us global recognition for our environmental efforts. We have been named one of Newsweek’s Top 100 Most Responsible Companies and achieved notable milestones with the EPA Green Power Partnership, including being a Top 30 Tech and Telecom Partner and a 100% green power user for the eighth consecutive year.

In 2023, we introduced a three-year enterprise sustainability structure designed to reduce environmental impacts and promote renewable diesel use. Our efficient designs cut IT footprint, energy consumption, and deployment costs, benefiting all stakeholders in our ecosystem.

This report highlights several other achievements throughout 2023 that reflect our leadership in ESG:

S&P Global – ESG Credit Indicator Report Card
We stand out as the only company among more than 180 corporate issuers to achieve the highest environmental rating (E-1), with top scores in Social (S-2) and Governance (G-2).

Emissions
Switch has maintained net zero Scope 1 emissions for the past two years and net zero Scope 2 carbon emissions for the past eight years across all operations nationwide. We successfully completed the surveillance audit for our ISO 14001 and 50001 certifications for the second year with zero non-conformances.

This year, we worked with suppliers and vendors to establish a comprehensive emissions reporting format and database, laying the groundwork for a successful zero Scope 3 strategy.

Energy
Our data centers have been powered by 100% renewable energy since 2016. We uphold an industry-leading power usage effectiveness (PUE) rating of 1.18. In 2023, we received Energy Star Certifications for our CITADEL and KEEP Campus buildings, increased fully deployed power capacity and set a pathway for securing multiple GW of solar and battery generation sources.

Water
Committed to a net positive water strategy, we have invested in projects that will more than offset our water use footprint. Our initiatives enable us to operate our campuses on 100% recycled water, with proprietary technology allowing water reuse and eliminating chemicals from our cooling systems.

Over the next decade, we will replenish and restore up to twice the water we use operationally. Our new data center designs eliminate all water consumption for cooling going forward.

People
We enhanced our executive team with industry veterans known for their innovative strategies and tangible results.

Welcoming over two hundred new team members in 2023, we continue to receive positive feedback on our health and wellness commitment. Our “High Performance Humans” have once again proven their extraordinary dedication to excellence.

As we strive to protect the world’s most precious resources and reduce our environmental impact, we will continue to grow and thrive. The practices outlined in this ESG Report are critical to our sustained vibrancy.

Our strategic efforts in power procurement, utility partnerships, and price protection plans have significantly reduced annual power costs, benefitting our company, customers, and the tech communities we serve.

Motivated by invention and driven by perfection, we focus on preserving natural resources, ensuring our company’s longevity, and fostering thriving communities.
About Switch

Switch, founded in 2000 by CEO Rob Roy, stands at the forefront as the premier data center designer, builder and operator, owning 100% of its land and facilities. As the AI, cloud and enterprise data center experts, Switch delivers unparalleled solutions for the most discerning clients worldwide. With a commitment to robustness, scalability and sustainability, Switch offers a comprehensive portfolio encompassing highly dense, liquid-cooled AI environments, hyperscale cloud infrastructure and industry-leading, highly secure enterprise data centers.

Our Approach to Meeting Third-Party Standards

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

- Switch Achieved ISO 14001 and ISO 50001 Certifications
- Received Energy Star certification for buildings in Tahoe Reno & Atlanta
- 2023 EPA Green Power Partnership National Top 100 3rd year in a row
- 2023 EPA Green Power Partnership Top 30 Tech & Telecom 3rd year in a row
- 2023 & 2022 Newsweek’s America’s Most Responsible Companies
- 2021 Women in Smart Energy (WISE) Award Recipient
- 2021 S&P Global Highest Ranking Environmental Rating (E-1) on ESG Report Card
- 2021 Data Centre Magazine’s Top 10 Most Sustainable Data Center Operators Globally
- 2020 MSCI and ISS Highest ESG Score Received
- 2020 & 2019 Top 10 Ranked Enterprise User of Solar from SEIA
- 2019 EPA Green Power Leadership Award
- 2019 Smart Energy Decisions: Data Center Energy Efficiency Technology Award

Notable third-party certifications, memberships and partnerships at Switch

MULTIPLE INDUSTRY AWARDS RECEIVED ANNUALLY SINCE FOUNDED IN 2000. IF YOU WOULD LIKE MORE INFORMATION, PLEASE REACH OUT TO esg@switch.com.
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 communicate 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 with seven United Nations Sustainable Development Goals (UN SDGs).

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

Switch demonstrates this pledge to UN SDGs through our data center design, policies, responsible business practices, and 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.
2023 ESG Highlights

**Environmental**
- **100%** Renewably Powered Since 2016
- **NET ZERO** Scope 2 Emissions since 2016
- **NET ZERO** Scope 1 Emissions since 2021

**Social**
- **45%** Ethnic Diversity Across Total Workforce
- **ZERO** Security Breaches
- **ISO 50001 & 14001** Certified
- **NET POSITIVE** Water Projects
- **Mental Health Virtual Sessions** Available via Teladoc

**Governance**
- **Board Oversight of ESG**
- **Semi-Annual Pulse Survey**
- **Whistleblower Business Ethics Hotline**
- **Equitable Male / Female Pay Ratio**
- **Scope 2 Emissions since 2016**
- **Scope 1 Emissions since 2021**
- **Whistleblower Business Ethics Hotline**
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 at 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 $73.7 million in total power-related cost savings as of December 2023.

2024 Goal: Net ZERO Scope 1 and Scope 2 Carbon Emissions

Impact: Switch has successfully achieved and will continue to maintain a Net ZERO Scope 2 since 2016 and a Scope 1 since 2021 through the implementation of energy-efficient technologies and the use of renewable energy resources. This achievement has not only promoted sustainability but has also set a great example for other facilities to follow.

ACHIEVED AHEAD OF SCHEDULE

"Our “net zero” strategy is defined as balancing our Scope 1 emissions with the purchase of high-quality carbon offsets verified by the VCS 2007. For the company’s Scope 2, Switch pursues a combination of the direct purchasing of renewable energy along with renewable energy certificates, where necessary, to cover 100% of our electricity procurement."
As this savings is shared with our clients, 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, our market leadership in low-cost renewable power will prove to be increasingly critical in the years to come and allow them to meet or accelerate their own corporate ESG goals.

In addition to the ongoing competitive and financial benefits described above, Switch 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 makes 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, certified by ISO 50001. 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 are 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 SVP 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 SVP of Sustainability, is dedicated to tracking, assessing and as necessary implementing policies and programs related to climate change. This staff identifies 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 the Climate Risk Management section on page 15 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.

Some of our eco-friendly waste programs include:

- 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 are destroyed and recycled by a third-party
- Switch provides all employees with reusable recycled bottles that can be filled from Switch provided water filtration stations in our workplaces
- Switch provides all employees 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
Since 2019, our paper shredding and recycling program has preserved over 3,727 trees while saving an estimated 1,880,810 gallons of water and over 102,101 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.

<table>
<thead>
<tr>
<th>WASTE DISPOSAL METRICS ¹</th>
<th>2020</th>
<th>2021</th>
<th>2022</th>
<th>2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>LANDFILL WASTE</td>
<td>837.9</td>
<td>811.2</td>
<td>1,032.4</td>
<td>777.0</td>
</tr>
<tr>
<td>RECYCLED MATERIALS</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SCRAP METAL</td>
<td>189.3</td>
<td>261.8</td>
<td>194.2</td>
<td>44.9</td>
</tr>
<tr>
<td>BATTERIES</td>
<td>109.1</td>
<td>33.3</td>
<td>603.3</td>
<td>65.0</td>
</tr>
<tr>
<td>CARDBOARD</td>
<td>60.6</td>
<td>93.5</td>
<td>89.6</td>
<td>14.4</td>
</tr>
<tr>
<td>PAPER</td>
<td>38.3</td>
<td>48.2</td>
<td>57.3</td>
<td>49.4</td>
</tr>
<tr>
<td>ELECTRONIC DEVICES</td>
<td>1.9</td>
<td>5.0</td>
<td>16.8</td>
<td>1.8</td>
</tr>
<tr>
<td>PLASTICS</td>
<td>0.6</td>
<td>1.6</td>
<td>1.0</td>
<td>0.5</td>
</tr>
<tr>
<td>ALUMINUM</td>
<td>0.7</td>
<td>1.0</td>
<td>0.5</td>
<td>0.0</td>
</tr>
<tr>
<td>TOTAL RECYCLING</td>
<td>400.5</td>
<td>399.4</td>
<td>962.7</td>
<td>176.0</td>
</tr>
</tbody>
</table>

¹ Volume measured in tons available at time of report  ² UPS / Generator batteries comprise 100% of hazardous waste

2024 Goal: Net ZERO waste by 2050

Impact:
Switch has successfully implemented recycling and waste reduction measures, which have led to a remarkable 48% reduction in waste. This initiative has been taken to conserve natural resources such as minerals, water, and timber. Our commitment to waste management and recycling has significantly reduced our environmental impact while also ensuring the availability of critical natural resources in the long run.
Water Conservation and Water Recycling

US Portfolio Average 2023 Water Usage Effectiveness ("WUE") 1.35

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.

We use innovative water technology to eliminate chemicals from our cooling systems, resulting in savings of over 155 million gallons of water in just three years, and we are leading the development of a 4,000-acre-foot (16-mile) treated effluent water pipeline to enable our Citadel Campus in Northern Nevada to run on 100% recycled water.

**Nevada (NV) Former Governor Steve Sisolak’s statement on NV’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.

**2024 Goal:**

- **WUE of <1.4**

- **ACHIEVED AHEAD OF SCHEDULE**

**Impact:**

Switch achieved a WUE of 1.35 indicating that Switch is using water resources efficiently, minimizing water consumption for cooling and other operational needs. This contributes to water conservation efforts, particularly in regions facing water scarcity or drought conditions.
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 700 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, implement a positive water strategy, implement policies and practices that further ensure we are proactive and responsible stewards of the climate and the environment and prevent 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 at each of our existing buildings and with new facilities 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 sustainability efforts
- Advocate for and participate in public policy and industry standards debate to help raise awareness, champion sustainable initiatives and challenge the industry status quo with annual review of Switch standards and areas for improvement
- Ensuring the company has the availability to access, review and consult any resources necessary to achieve environmental objectives and energy targets

To review our full Environmental Policy, please request it by emailing ESG@switch.com.

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 Chief Construction Officer 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 Policy, please request it by emailing ESG@.switch.com.

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
6. Power availability

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 2023 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.

Switch is actively targeting net zero by auditing its Scope 3 footprint, which encompasses emissions that the company itself does not produce, and are not the result of activities from assets owned or controlled by it, but by those that it’s indirectly responsible for. Throughout the auditing process, Switch’s leadership in Sustainability is influencing its vendors and suppliers and guiding them to reduce their carbon emissions and overall environmental impact.

Switch maintains ISO 50001 and 14001 certifications for its Energy and Environmental Management Systems with zero nonconformances.
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 Chief Construction Officer, who continually works to develop and implement data center design improvements and advances in equipment, systems and processes to create the most advanced data center ecosystem in the world.

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.
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 (AHUs). 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%.

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 its partnership to begin development of one of the largest solar footprint and battery storage projects in the technology industry.

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 former Nevada Governor, Steve Sisolak, as well as leading national renewable energy advocates.

“Nevada can enjoy the benefits 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

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.
Partnership with LAS VEGAS GRAND PRIX

In March 2023, Switch announced its multi-year partnership for the FORMULA 1 HEINEKEN SILVER LAS VEGAS GRAND PRIX. This partnership is a step forward in the direction of sustainability goals, aiming to achieve net zero carbon emissions by 2030. Switch is proud to be a part of this initiative and will provide the necessary resources to support the event’s sustainability goals. By partnering with the FORMULA 1 HEINEKEN SILVER LAS VEGAS GRAND PRIX, Switch is playing an important role in contributing towards a greener future.

“Switch is excited to be an event partner to support the FORMULA 1 HEINEKEN SILVER LAS VEGAS GRAND PRIX. By achieving 100% renewable power since 2016, leading innovations in reducing the impacts of water use and using renewable diesel, Switch is consistently recognized as a global leader in its efforts to enhance sustainability for the customers and communities it serves.”

- Thomas Morton, President of Switch
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 Codes. 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 have a zero tolerance approach to modern slavery, including forced and 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.

<table>
<thead>
<tr>
<th></th>
<th>2020</th>
<th>2021</th>
<th>2022</th>
<th>2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>WORK-RELATED INJURIES (LTIs)</td>
<td>1</td>
<td>0</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>OCCUPATIONAL DISEASES</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>FATALITIES</td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
</tbody>
</table>

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

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

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 the 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
5. Sharing information and analytics about the clear relationship between diversity and business performance.

Click here to view the full policy or reach out to ESG@switch.com for more information.

<table>
<thead>
<tr>
<th>WORKFORCE DIVERSITY METRICS</th>
<th>2020</th>
<th>2021¹</th>
<th>2022</th>
<th>2023</th>
</tr>
</thead>
<tbody>
<tr>
<td>ANNUAL EMPLOYEE TURNOVER PERCENTAGE</td>
<td>15%</td>
<td>20%</td>
<td>19%</td>
<td>19%</td>
</tr>
<tr>
<td>NUMBER OF WOMEN IN WORKFORCE</td>
<td>154</td>
<td>158</td>
<td>183</td>
<td>204</td>
</tr>
<tr>
<td>WOMEN AS A PERCENTAGE OF TOTAL WORKFORCE</td>
<td>20%</td>
<td>21%</td>
<td>21%</td>
<td>22%</td>
</tr>
<tr>
<td>NUMBER OF WOMEN IN SENIOR MANAGEMENT ¹</td>
<td>20</td>
<td>20</td>
<td>17</td>
<td>15</td>
</tr>
<tr>
<td>NUMBER OF WOMEN IN EXECUTIVE MANAGEMENT ²</td>
<td>10</td>
<td>10</td>
<td>9</td>
<td>4</td>
</tr>
<tr>
<td>TOTAL NUMBER OF NEW HIRES ¹</td>
<td>88</td>
<td>135</td>
<td>181</td>
<td>245</td>
</tr>
<tr>
<td>NUMBER OF WOMEN NEWLY HIRED</td>
<td>17</td>
<td>36</td>
<td>38</td>
<td>53</td>
</tr>
<tr>
<td>AVERAGE YEARS EMPLOYED (FEMALES)</td>
<td>3.9</td>
<td>4.1</td>
<td>4.2</td>
<td>4.1</td>
</tr>
<tr>
<td>AVERAGE YEARS EMPLOYED (MALES)</td>
<td>4.5</td>
<td>5.0</td>
<td>4.9</td>
<td>4.9</td>
</tr>
<tr>
<td>NUMBER OF ETHNIC MINORITY EMPLOYEES</td>
<td>291</td>
<td>290</td>
<td>361</td>
<td>402</td>
</tr>
<tr>
<td>ETHNIC MINORITIES AS A PERCENTAGE OF TOTAL WORKFORCE</td>
<td>40%</td>
<td>42%</td>
<td>45%</td>
<td>46%</td>
</tr>
</tbody>
</table>

¹ Includes VP and above    ² Includes SVP and above    ³ 2021 total headcount at year end was 741. Metrics presented exclude Data Foundry in 2021
⁴ Includes Data Foundry Acquisition
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.

New women hires increased by 39% from last year.

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 comprise 63% of our security staff and 25% of our overall workforce, the majority of whom work within our Security Operations team.

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 or reach out to ESG@switch.com for more information.
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 14% 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, 14% 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.

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) and Code.org. 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 this organization because they align with our mission of supporting and promoting STEAM education throughout the world.

Many Switch team members get involved through mentorship and volunteer opportunities.

Employee Engagement Survey

In 2023, Switch conducted its semi-annual employee Pulse Survey which offers all team members an opportunity to anonymously provide feedback to measure their satisfaction and recognition of value at Switch.

96% of participants responded with “strongly agree”, “agree” or “neutral”
Partnerships for Talent Pipeline Development and Recruitment

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

UNLV
University of Nevada, Las Vegas (UNLV)

Switch has 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.

Truckee Meadows Community College of Southern Nevada (TMCC)

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.
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 over 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 25,600 training hours last year, equating to more than 30 hours per employee.

In 2023, 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 dependents.

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.

Teladoc 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 offers paid maternity leave for mothers recovering from labor / delivery, providing important family time to foster the bond with a new child.
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 mid-year appreciation events in addition to 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.

The Switch Engagement team planned several initiatives including a Switch Step Challenge, a Selfie Challenge, a March Madness Bracket Challenge, a Color Code Workshop, Switch SHOUTOUTS, an Ugly Sweater Competition, a Virtual Holiday Gathering, and in-person Holiday Celebrations. In addition, many departments also hold monthly group birthday celebrations. These initiatives aim to encourage team members to engage with each other, participate in competitions and events, and foster a culture of camaraderie and appreciation.

2023 Switch ESG Report
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.

As of 2023, the Life Muse Leadership Development Program had 95 graduates 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 platform 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

Bonuses, Increases and Advancement

Switch 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).

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.

Mentorship Program Opportunities

One of the STEAM-based organizations that Switch regularly supports, FIRST™ Robotics (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.
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.

2023 Switch ESG Report
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.

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.

International Women’s Forum

Switch is a member of the International Women’s Forum (IWF) which is an invitation-only network of the 7500 preeminent, most accomplished women in the world. Switch’s own Missy Young is a member of this prestigious organization that connects women leaders across every professional sector in support of each other and the common mission of advancing women’s leadership and championing equality worldwide.

Communities in Schools of Southern Nevada

Switch consistently supports Communities in Schools of Southern Nevada, its headquarters, that surrounds students with a community of support, creating an equitable path to education for all local students, regardless of zip code, race or history of marginalization. This organization serves more than 70,000 students in the Southern Nevada area to stay in school while empowering a whole new community of change makers to do good in the world.

LVMPD Wonder Women of Metro

Switch is an annual sponsor of Las Vegas Metro Police Department Wonder Women of Metro which celebrates and recognizes female leadership in law enforcement. Switch provides funds for the LVMPD Foundation that raises public awareness and strengthens the relationship between the LVMPD and the community. Switch’s CIO, Missy Young, was the 2022 keynote speaker at the annual luncheon that recognizes women in the department and the importance that diverse perspectives bring to our community.

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. In 2022, three team members from Switch served as Judges at the Las Vegas Regional FIRST Robotics Regional Competition. At this year’s event, hundreds of kids and over 50 teams from four countries competed for awards based on their robot design, innovation, and engineering prowess. Our judges were tasked with scoring students from coding their robots to work autonomously, how they raised funds for their team, and even how they machined metal to construct their creations.

Ronald McDonald House

The mission of Ronald McDonald House is to provide a supportive “home-away-from-home” for families and children who are receiving inpatient or outpatient medical treatment at local hospitals. Without these facilities, families might have to sleep in a hospital lobby, a child’s hospital room or even in their cars, as most families cannot afford a hotel room for weeks or sometimes months – especially under the financial stress of mounting medical bills. Several Switch team members used their culinary skills to brighten the families’ day with a homemade pasta dinner.

Project 150

Project 150 is a Las Vegas nonprofit organization that started because a news outlet reported about 150 homeless kids at just one of the local high schools alone. This organization provides support and services to homeless, displaced and disadvantaged high school students so they can remain in school, graduate and build bright futures.

Public Education Foundation

The Public Education Foundation’s mission is to partner with the community and Nevada’s Clark County School District to meet critical needs that will strengthen our public schools. Switch’s contributions ensure every public school student can succeed.
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 Communications
- Lyon County School District via Churchill County Communications
- Switch directly services the Walker River Paiute Tribe community
Switch Board Composition and Oversight of ESG

Switch currently has board members with representatives from Switch, Digital Bridge and IFM Investors.

The Switch Board provides oversight and guidance to executive 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. The Switch Board also oversees 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.

For more information, visit the About Switch page.
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 Executive team and reports to the Switch Board. At least annually, the Switch Board meets 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 Executive Team and Board also discusses 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.

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 Director 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

The Switch Board works with the executive team in 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. 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 anti-corruption policies. Internal Audit also performs annual audits of entity level controls inclusive of ethical standards controls. Beyond annual 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.

All whistleblower reports are disclosed and communicated 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 anti-corruption 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 actively advocates for policies at the Federal, State and Local levels of government that impact our company, our environment, and our technological future. As a growing company, it is vital to have effective elected and appointed government leaders who support and understand our industry and its issues.

Switch’s policy is that all contributions are made in strict accordance with applicable federal, state, and local laws and regulations, demonstrating our commitment to ethical and legal practices. 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 and executed by Switch’s SVP of Government and Public Affairs in accordance with the policy directive. Under the direction and vision of our CEO, Switch’s SVP of Government and Public Affairs develops political contribution strategies and processes all political support requests for consideration. The CFO, President and CEO review plans, budgets and overall progress regular basis.

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 employees, agents, or representatives of Switch.

Switch encourages employees to fulfill their civic responsibilities by participating in all local, state, and federal elections. 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 exercise their right to vote.

Lobbying & Political Expenses

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

It is also a member of the following organizations:

**Nevada**
- Economic Development Authority of Western Reno (EDAWN)
- Las Vegas Global Economic Alliance (LVGEA)
- Vegas Chamber

**Michigan**
- Grand Rapids Chamber of Commerce
- The Right Place

**Texas**
- Round Rock Chamber of Commerce

**National/International**
- Data Center Coalition
- Government University Industry Research Roundtable (GUIRR)
- International City / County Management Association (ICMA)
- International Women’s Forum (IWF)

Switch believes in total transparency of its lobbying and political activities. The company complies with all required ethics and lobbying disclosure laws. Switch strictly adheres to various rules and regulations concerning gifts, entertainment, lobbying expenses, and reporting requirements in each jurisdiction. These are currently governed by the following acts: the Nevada Revised Statutes, the Georgia Ethics in Government Act, the Michigan Lobbying Disclosure Act of 1995, the Texas Lobby Law, and Chapter 34 of Title 1 of the Texas Administrative Code.

All lobbying activities are executed through the government affairs team, led by the SVP of Government and Public Affairs. In accordance with the policy directive, our CEO and President direct all practices we implement in support of this policy.
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
• EVP of Network Operations
• Director of IT Compliance
• Director of Information Security (InfoSec)

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 & Cyber-attacks

Security Breach Disclosure: Switch has had ZERO breaches since its founding in 2000

Switch has operational measures in place to monitor and respond to data breaches and cyber-attacks. 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:

- Denial of service
- Malicious code
- Unauthorized access
- Compromised asset or information
- Social engineering
- Internal / external hacking
- Unauthorized data
- Leakage in appropriate usage
- Environmental/external
- Business model
- Leadership changes
- Third party
- Fraud
Incident Response Plan (IRP)

An Incident Response Plan (IRP) has been developed as an integral component of Switch’s overall information security program. The IRP includes action plans that deal with intrusions, data theft, denial of service (DoS), and other IT security-related incidents. The six major steps of the IRP are designed to ensure Switch is prepared to effectively detect and respond to incidents in an effective manner to minimize adverse impacts and provide lessons learned.

The IRP steps are as follows:

1. PREPARATION
2. IDENTIFICATION
3. CONTAINMENT
4. ERADICATION
5. RECOVERY
6. LESSONS LEARNED

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.

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:

- Externally facing web applications
- Applications in the DMZ
- All internal trusted Switch information systems
- Users are assessed for susceptibility to phishing
- Vulnerabilities are tested for exploitability

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.
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 Plan (CSPP) 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 Tier 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.

Audit Certificate Directory

Audit reports include: ISO 27001, ISO 50001, ISO 14001, SOC 1, SOC 2, SOC 3, MPAA, PCI DSS-ROC, PCI DSS-AOC, NIST 800-53 (Type 1), HIPAA and HITRUST.

To request or obtain audit reports, please visit The Audit Certificate Directory.

If you would like details on each audit / certification, please visit https://www.switch.com/compliance/.

2023 Certification Received:
HITRUST Common Security Framework (CSF)
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 manufacturer’s 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

100% Uptime Since Founded in 2000

- **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 (ASHRAE 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, ASHRAE).

- **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 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: ASHRAE 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 ASHRAE 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 Switch Policy Team (policy@switch.com).
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.
The highest level of governance is at the Board level. 

**Corporate Governance**

- There have been no restatements.

**Operations Safety**

**Business Ethics**

- Switch is a technology infrastructure corporation that provides data center colocation, telecommunications, interconnection, and professional services to enterprise clients.

**Environmental Policies & Initiatives**

- Our data center facilities totaled 9.2 million gross square feet (GSF) and 5.05 gigawatts (GW) of IT load.

- While the majority of the design and construction of our data centers and related infrastructure rely on third-party service providers, in particular, we depend on third-party suppliers for labor and materials during construction. Our products and infrastructure is performed by Switch's own general contractor, we do rely on select third-party vendors to provide internet, telecommunications and fiber optic network connectivity to our clients in our data centers.

**Data Privacy & Security**

- Human Capital Metrics

- 102-7 Scale of the organization

- 102-5 Location of headquarters

- 102-6 Markets served

- 102-4 Location of operations

- 102-2 Activities, brands, products, and services

- 102-1 Name of the organization

**TCFD – Governance**

- The highest level of ESG oversight is at the Board level.

**Business Ethics Program**

- The highest level of governance is at the Board level.

**Data Privacy & Security**

- The highest level of governance is at the Board level.

**Human Capital Metrics**

- See CEO letter, Page 3

**TCFD – Governance B) Describe the management of risk associated with climate-related opportunities and threats.**

**Operational Metrics**

- SASB - Activity Metrics

**TCFD – Governance A) Disclose the Board’s oversight of climate-related risks and opportunities.**

- SASB IF-RE-000.C – Percentage of indirectly managed assets, by property subsector

- SASB IF-RE-000.B - Leasable floor area, by property subsector

- SASB IF-RE-000.A – Number of assets, by property sector

**TCFD – Governance**

- SASB IF-RE-000.C – Percentage of indirectly managed assets, by property subsector

- SASB IF-RE-000.B - Leasable floor area, by property subsector

- SASB IF-RE-000.A – Number of assets, by property sector

- TCFD – Governance A) Disclose the Board’s oversight of climate-related risks and opportunities.

**Human Capital Metrics**

- Human Capital Metrics

**TCFD – Governance B) Describe the management of risk associated with climate-related opportunities and threats.**

**Environmental Policies & Initiatives**

- Our data center facilities totaled 9.2 million gross square feet (GSF) and 5.05 gigawatts (GW) of IT load.

**Data Privacy & Security**

- Human Capital Metrics

**TCFD – Governance A) Disclose the Board’s oversight of climate-related risks and opportunities.**

**Business Ethics Program**

- The highest level of governance is at the Board level.

**Data Privacy & Security**

- The highest level of governance is at the Board level.

**Human Capital Metrics**

- Human Capital Metrics

**TCFD – Governance B) Describe the management of risk associated with climate-related opportunities and threats.**

**Environmental Policies & Initiatives**

- Our data center facilities totaled 9.2 million gross square feet (GSF) and 5.05 gigawatts (GW) of IT load.

**Data Privacy & Security**

- Human Capital Metrics

**TCFD – Governance A) Disclose the Board’s oversight of climate-related risks and opportunities.**

**Business Ethics Program**

- The highest level of governance is at the Board level.

**Data Privacy & Security**

- The highest level of governance is at the Board level.

**Human Capital Metrics**

- Human Capital Metrics

**TCFD – Governance B) Describe the management of risk associated with climate-related opportunities and threats.**

**Environmental Policies & Initiatives**

- Our data center facilities totaled 9.2 million gross square feet (GSF) and 5.05 gigawatts (GW) of IT load.

**Data Privacy & Security**

- Human Capital Metrics

**TCFD – Governance A) Disclose the Board’s oversight of climate-related risks and opportunities.**

**Business Ethics Program**

- The highest level of governance is at the Board level.

**Data Privacy & Security**

- The highest level of governance is at the Board level.

**Human Capital Metrics**

- Human Capital Metrics

**TCFD – Governance B) Describe the management of risk associated with climate-related opportunities and threats.**

**Environmental Policies & Initiatives**

- Our data center facilities totaled 9.2 million gross square feet (GSF) and 5.05 gigawatts (GW) of IT load.

**Data Privacy & Security**

- Human Capital Metrics

**TCFD – Governance A) Disclose the Board’s oversight of climate-related risks and opportunities.**

**Business Ethics Program**

- The highest level of governance is at the Board level.

**Data Privacy & Security**

- The highest level of governance is at the Board level.

**Human Capital Metrics**

- Human Capital Metrics

**TCFD – Governance B) Describe the management of risk associated with climate-related opportunities and threats.**

**Environmental Policies & Initiatives**

- Our data center facilities totaled 9.2 million gross square feet (GSF) and 5.05 gigawatts (GW) of IT load.

**Data Privacy & Security**

- Human Capital Metrics

**TCFD – Governance A) Disclose the Board’s oversight of climate-related risks and opportunities.**

**Business Ethics Program**

- The highest level of governance is at the Board level.

**Data Privacy & Security**

- The highest level of governance is at the Board level.

**Human Capital Metrics**

- Human Capital Metrics

**TCFD – Governance B) Describe the management of risk associated with climate-related opportunities and threats.**

**Environmental Policies & Initiatives**

- Our data center facilities totaled 9.2 million gross square feet (GSF) and 5.05 gigawatts (GW) of IT load.

**Data Privacy & Security**

- Human Capital Metrics

**TCFD – Governance A) Disclose the Board’s oversight of climate-related risks and opportunities.**

**Business Ethics Program**

- The highest level of governance is at the Board level.

**Data Privacy & Security**

- The highest level of governance is at the Board level.
This report has been prepared in accordance with GRI Standards: Core option 102-54 Claims of reporting in accordance with the GRI Standards

GRI 201: Economic Performance
TCFD - Strategy
Disclosure Number and Title
201-2 Financial implications and other risks and opportunities due to climate change

TCFD - Strategy B) Describe the impact of climate-related risks and opportunities on the organization’s businesses, strategy, and financial planning

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.

GRI 205: Anti-corruption
Disclosure Number and Title
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
301-1 Recycled input materials used

Waste Disposal and Recycling

GRI 302: Energy
SASB – Energy Management
Disclosure Number and Title
302-1 Energy consumption within the organization

Emissions and Power Usage Data

TCFD - Metrics & Targets
Disclosure Number and Title
302-1 Energy consumption within the organization

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-1300a.3
Like-for-like percentage change in energy consumption for the portfolio area with data coverage, by property subsector

+6.4%

SASB IF-RE-1300a.4
Percentage of eligible portfolio that:

(1) has an energy rating

22%

(2) is certified to ENERGY STAR, by property subsector

SASB IF-RE-1300a.5
Description of how building energy management considerations are integrated into property investment analysis and operational strategy

2023 ESG Report “Physical Climate Risk Management Program” (pp. 15)

GRI 303: Water and Effluents
SASB – Water Management
Disclosure Number and Title
303-1 Interactions with water as a shared resource

2023 ESG Report “Water Conservation & Water Recycling” and “Physical Climate Risk Management Program” (pp. 12 and 15)

303-2 Management of water discharge-related impacts

2023 ESG Report “Water Conservation & Water Recycling” and “Physical Climate Risk Management Program” (pp. 12 and 15)

SASB IF-RE-1400a.1
Water withdrawal data coverage as a percentage of:

(1) total floor area

100%

(2) floor area in regions with high / extremely high baseline water stress

33%

303-2 Management of water discharge-related impacts

303-3 Water withdrawal, 303-5 Water consumption, SASB IF-RE-1400a.2
Total water withdrawn by portfolio area with data coverage

(1) 1.71 million m3

(2) 11.2%
**SASB – Management of Tenant Sustainability Impacts**

**Disclosure Number and Title**

<table>
<thead>
<tr>
<th>SASB IF-RE-410a.1</th>
<th>2023 Response</th>
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<tbody>
<tr>
<td>(1) Percentage of new leases that contain a cost recovery clause for resource efficiency-related capital improvements</td>
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<td>(2) Associated leased floor area, by property subsector</td>
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<table>
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<tr>
<th>SASB IF-RE-410a.2</th>
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<tr>
<td>Percentage of tenants separately metered or submetered for:</td>
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<td>(1) Grid electricity consumption</td>
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<td>(2) Water withdrawals, by property sector</td>
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**SASB – Climate Change Adaptation**

**Disclosure Number and Title**

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<th>SASB IF-RE-450a.1</th>
<th>2023 Response</th>
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<tr>
<td>Area of properties located in 100-year flood zones, by property subsector</td>
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<tr>
<th>SASB IF-RE-450a.2</th>
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<tr>
<td>Description of climate change risk exposure analysis, degree of systematic portfolio exposure, and of strategies for mitigating risks</td>
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**INTRODUCTION**

**ENVIRONMENTAL POLICIES & INITIATIVES**

**HUMAN CAPITAL**

**CORPORATE GOVERNANCE**

**BUSINESS ETHICS**

**DATA PRIVACY & SECURITY**

**OPERATIONS SAFETY**

**APPENDIX**
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<td>Disclosure Number and Title</td>
<td>401-1 New employee hires and employee turnover</td>
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<td>Workforce Metrics</td>
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<td>Operations and Safety Program</td>
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<td>403-3 Occupational health services</td>
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<td>Operations and Safety Program</td>
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<td>403-4 Worker participation, consultation, and communication on occupational health and safety</td>
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<tr>
<td>Operations and Safety Program</td>
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<tr>
<td>403-5 Worker training on an occupational health and safety</td>
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<td>Operations and Safety Program</td>
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<td>403-6 Promotion of worker health</td>
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<td>Operations and Safety Program</td>
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<td>403-9 Work-related injuries</td>
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<td>CS&amp;H Performance Metrics – 2023</td>
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<tr>
<td>Number of Work-related Injuries: 2</td>
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<td>Number of Occupational Diseases: 0</td>
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<td>Number of Fatalities: 0</td>
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<th>GRI 404: Training and Education</th>
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<td>Disclosure Number and Title</td>
<td>404-1 Average hours of training per year per employee</td>
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<td>404-2 Programs for upgrading employee skills and transition assistance programs</td>
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<td>Talent Development</td>
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<td>404-3 Percentage of employees receiving regular performance and career development reviews</td>
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<td>Performance Management and Training</td>
<td>100% of employees receive regular performance reviews</td>
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<td>405-2 Ratio of basic salary and remuneration of women to men</td>
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<td>Diversity, Equity and Inclusion</td>
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<td>413-2 Operations with significant actual and potential negative impacts on local communities</td>
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<td>Community Involvement</td>
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<td>Disclosure Number and Title</td>
<td>417-1 Requirements for product and service information and labeling</td>
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<td>Client Eco-Efficiency Program and Transparency</td>
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Data runs the planet® and I believe that it should not ruin the planet.

Rob Roy - CEO & Founder