

CODE OF CONDUCT

TEAM MEMBERS:

Vantage Data Centers powers, cools, protects and connects the technology of the world's well-known hyperscalers, cloud providers and large enterprises around the globe.

Walk through any of our facilities—racks, servers, chillers and cables—all far outnumber the people. Yet people really are what our data centers are all about. As we are supporting the missions of our customers, we're helping people connect with each other across the world; meet virtually, whether as co-workers, students, friends or family; start and run businesses; fully enjoy new technologies; safely archive photos and documents that are truly priceless, or simply irreplaceable to one person.

And each of us has a critical role to play in our success.

Vantage's Code of Conduct is a roadmap for our behaviors and how we treat one another. It defines our culture of leading with integrity. It outlines how we conduct our business to the highest of ethical standards. And it reaffirms our commitment to being a workplace of inclusion and diversity—one where principles such as transparency and accountability are non-negotiable.

Thank you for following our Code of Conduct and living its values. Together, we will achieve great things as we support the missions of our customers.

SUREEL CHOKSI
PRESIDENT AND CEO



2.0

Our Vision and Our Values



Our vision is to be the pre-eminent hyperscale provider globally.

We are committed to being a workplace of inclusion, equity, respect and acceptance. We celebrate diversity and intentionally seek out opportunities to learn from one another's experience.



TRUST

assume positive intent | communicate honestly |
act with integrity | do the right thing |
protect each other and our business



ACCOUNTABILITY

take ownership | follow through |
own our mistakes | seek solutions |
value and solicit feedback



RESPECT

exchange thoughts and ideas freely |
treat everyone as we would like to be treated |
embrace diverse viewpoints



AGILITY

adapt quickly | embrace innovation | encourage
continuous learning | be resourceful and nimble

1.0 MESSAGE FROM
PRESIDENT AND CEO

2.0 OUR VISION AND
OUR VALUES

3.0 ACCOUNTABILITY

4.0 ACTING WITH
INTEGRITY AND
RESPECT FOR
OUR PEOPLE

5.0 TRUST IN THE
MARKETPLACE AND
THE COMMUNITY

6.0 YOUR
RESPONSIBILITIES

3.0 accountability



Our Code of Conduct is one way we demonstrate our commitment to our values. We are committed to conducting ourselves with the highest level of ethical standards. We each play a role in living these values and following our Code of Conduct.

While the Code of Conduct does not address every situation, it is intended to provide guidance to make ethical decisions. If you have a question or believe Vantage or a co-worker is not meeting our ethical standards, we encourage you to speak up. We want to hear from you.

WHO IS REQUIRED TO FOLLOW OUR CODE OF CONDUCT?

Our Code of Conduct applies to every director, officer and employee of Vantage. Failure to follow the Code of Conduct may result in disciplinary action, up to and including termination of employment. Our Code of Conduct also applies to temporary and part-time employees, as well as those acting on Vantage's behalf, such as agents, representatives and consultants. Their failure to follow the Code of Conduct can result in termination of their relationship with Vantage.

The Code in action

As a manager, resolving performance issues is part of day to day personnel management, but issues that violate any tenet of the Code should be escalated to Human Resources, Corporate Compliance or any member of the Executive Team.

MAKING A REPORT OR ASKING A QUESTION

Raising concerns about a potential issue or asking questions about something that does not seem right are important ways to help Vantage maintain our commitment to conduct business ethically. You may report your concerns anonymously, where permitted by local law.

You may use any of the following options to raise a concern or to ask a question:

- Your manager/supervisor
- Human Resources
- Corporate Compliance
- Any member of the Executive Team
- Vantage Speak Up Line: <https://vantage-dc.ethicspoint.com>
(Local phone numbers are available through the Hotline website.)

The Speak Up Line Policy

In situations where you prefer to place an anonymous report in confidence, you are encouraged to use our Speak Up Line, hosted by a third-party hotline provider, EthicsPoint. The information you provide will be sent to us by EthicsPoint on a totally confidential and anonymous basis if you should choose. You have our guarantee that your comments will be heard.

These resources are always available to help you make the right choices and meet Vantage's high standards for ethical conduct. We are committed to treating reports seriously, fairly and promptly. As appropriate, Vantage will investigate reports or issues. If an investigation determines that a violation of the Code of Conduct, Vantage policies or the law has occurred, anyone responsible may be subject to disciplinary action, up to and including termination of employment.

NO RETALIATION

We do not tolerate retaliation. We are committed to having a workplace where individuals are empowered to raise concerns in good faith without the fear of retaliation. Anyone who retaliates against an employee for refusing to do something that violates the Code of Conduct, Vantage policies, or the law, for raising a good faith concern, or for cooperating in an investigation, will be subject to disciplinary action, up to and including termination of employment.

4.0

acting with integrity and respect for our people





We are committed to acting with integrity and respecting one another. This means creating a culturally diverse workforce through practices that provide equal access and fair treatment to all employees on the basis of merit. We also strive to have a safe workplace, where everyone has the opportunity to thrive. Therefore, we do not tolerate harassment or discrimination in the workplace.

It takes all of us working collaboratively to cultivate a supportive atmosphere of mutual respect and inclusion.

A COMPANY OF CHOICE

We aim to create a better company—one where every individual feels respected and valued. We want to create an environment that brings out the best in everyone and fosters diversity and inclusion.

HOW DO WE CREATE A COMPANY OF CHOICE?

Equal Opportunity Employment

We provide equal opportunities to all qualified candidates and employees. Employment opportunities are based solely on individual merit and qualifications. We are also committed to hiring people with disabilities and making reasonable accommodations to qualified employees.

No Discrimination

We do not tolerate discrimination. We strictly prohibit discrimination based on race, color, religion, national origin or ancestry, sex or gender, gender identity or expression, sexual orientation, age, mental or physical disability, medical condition, pregnancy, marital status, military or veteran status, or any other characteristics protected by law.

Justice, Equity, Diversity and Inclusivity

We are a champion of justice, equity, diversity and inclusivity in all aspects of our work. We believe that a wide array of perspectives enables all organizations to be more effective, more creative and more relevant. We want to dismantle barriers to resources and opportunities and ensure access to all to build a culture that celebrates the diversity of our employees. By creating a diverse and inclusive culture, we encourage and support our employees and better serve our customers. It's simply the right thing to do.

Avoid Conflicts of Interest

We make decisions to benefit our company and our customers—not ourselves. To ensure this, we need to avoid conflicts of interest and always use our best judgment. A conflict of interest arises when an employee's personal relationships or financial interests interfere with Vantage's best interests. We should avoid situations where a personal relationship or financial interest impacts or influences decisions made for the company.

Throughout your employment or appointment with Vantage, you are required to promptly and fully disclose relevant interests through the completion of a Relevant Interests Disclosure Form.

A SAFE WORKPLACE

We are committed to creating a healthy and safe workplace. A safe workplace allows our employees to succeed and our company to thrive.

HOW DO WE CREATE A SAFE WORKPLACE?

No Harassment

We do not tolerate harassment of any kind—verbal, physical or visual. Harassment is not only prohibited by law, but it also creates a hostile, intimidating and offensive workplace.

Health and Safety

We are committed to a safe, healthy and violence-free workplace. We are all responsible for following safe and healthy practices in the workplace and to comply with workplace safety regulations. Behavior that poses risks to the health and safety of our employees, customers, visitors or any person on site at one our campuses is prohibited. Violence and threats of violence are not permitted.

Drugs and Alcohol

We expect employees to work in a condition free from the influence of illegal drugs or alcohol.

5.0

trust in the marketplace and the community



Our success is built on providing exceptional products and services. Our customers are central to our mission. Our community is where we work, live and demonstrate our values. Building and maintaining trust in the marketplace and community is essential to our business. We build and maintain this trust by our commitment to complying with laws and being responsible citizens in our communities.

COMPLY WITH LAWS

Gifts, meals, entertainment and travel can build goodwill between Vantage and our customers, suppliers and the community. Business decisions should never be based on these gifts. When we provide gifts, meals, entertainment or travel, we make sure they are reasonable in value, given transparently, and have a legitimate business purpose.

All gifts and hospitality offered, given, or received must be recorded in the [Vantage Gifts and Hospitality Log](#), even if they are declined. Entries in the Log must identify the type of expense, name of the recipient, its value, and the business justification. It is not necessary to record in the log the exchange of promotional items of nominal value such as pens, key chains, mugs, hats, t-shirts, or similar items displaying a company's logo.

HOW DO WE COMPLY WITH LAWS?

Anti-Corruption

We do not offer or accept bribes or kickbacks. We must remain honest and transparent in our interactions with government officials and obtain and retain business fairly on our own merits. Anti-corruption laws prohibit anyone employed by or acting on our behalf from offering or paying bribes to government officials in order to obtain or retain business, gain any improper advantage, or influence any act or decision of a government official. Similarly, we prohibit offering bribes, kickbacks, or other improper benefits in any commercial transactions or to any employees of private entities. We would rather lose business than pay a bribe, kickback or provide other improper benefits.

Offering gifts, meals, entertainment or travel to government officials can easily be perceived as bribery. Consequently, Vantage prohibits the giving or receiving of any gifts or hospitality to government officials and their immediate family members.

Also, any charitable contributions must be made to support a legitimate charitable cause, have a legitimate purpose, and be pre-approved.

Competition

We compete honestly and fairly. We want to win and retain business, but how we compete is as important as the results. We comply with antitrust and competition laws that apply to us and do not engage in anticompetitive practices, such as agreeing to prices with competitors, bid rigging, or boycotting a supplier or customer.

Trade

We comply with global trade controls and economic sanctions that prohibit us from doing business with certain countries, governments, entities and individuals. These laws cover the export and import of physical items and intangible items, such as data and information. In addition, we do not participate in any unauthorized economic boycott.

Privacy and Data Protection

We are committed to transparently handle customer data. Our customers trust us to protect their privacy and use their data in only ways they permit. We protect our customers' data by providing secure products, services and facilities. We know that data privacy laws and regulations are complex, constantly evolving and vary by country. We are committed to complying with all applicable privacy, security and data protection laws.

We foster a culture of transparency and accountability. We are committed to demonstrating respect for individual privacy rights by maintaining the confidentiality of personal information and employee data entrusted to us.

The Code in action

We avoid formal or informal agreements with competitors that limit or restrict competition. We do not engage in illegal or dishonest tactics. Our marketing materials focus on the positive aspects of our products and services without disparaging our competitors. We do not need to create an unfair business advantage—our competitive advantage is achieved with our superior performance.

Intellectual Property and Confidentiality

We protect and respect information and ideas—both ours and others. We actively take measures to protect our intellectual property and respect the intellectual property of others, especially our customers. We have a responsibility to protect and safeguard the confidential information of our customers and business partners. We treat it like our own. We never disclose confidential information to anyone who does not need to know it and do not use or share this information without permission. Our customers and partners trust us to be ethical and protect their valuable information and intellectual property.

Our own confidential information and intellectual property are important assets. We preserve our own intellectual property rights through copyrights, patents, trademarks and protecting trade secrets. We respect the intellectual property rights of others and every employee is responsible for doing the same. Every employee is also responsible for protecting our confidential information and intellectual property. This obligation continues even after an employee leaves the company.

Financial Integrity

We understand that financial integrity and conformity with applicable financial laws and regulations are core to our business. We maintain books, records, accounts and financial statements in reasonable detail that accurately and fairly reflect our payments, assets and transactions. We have developed internal controls designed to preserve the integrity of accounting records and information.

The Code in action

Confidential information, which is broadly defined as information about our company or business not available to the public, is vital to our success. We do not share our confidential information without a legitimate business reason and without proper authorization.

Our records must be accurate and complete. Keeping accurate and complete records is essential to meeting our regulatory and financial obligations, maintaining our customers' trust and making good business decisions.

Each employee is responsible for making sure that money is spent appropriately, financial records are accurate and complete, and internal controls are followed. This is especially important every time we hire a new vendor, sign a new business contract, enter into a new deal or expense something to the company.

BEING RESPONSIBLE CITIZENS IN OUR COMMUNITY

We strive to make a positive impact in our community and around the world. For us to achieve our mission and live our values, we must be responsible citizens wherever we operate and conduct business.

HOW DO WE ACT AS RESPONSIBLE CITIZENS?

Human Rights and Fair Labor Practices/Conditions

We support and promote the protection of human rights around the world. We are committed to upholding the human rights of both our employees and those of companies we engage. We strictly prohibit child labor, prison or forced labor, human trafficking, or physical punishment. We require our business partners and suppliers to avoid such practices, and we expect them to also promote and protect human rights.

Gifts, Meals, Entertainment and Travel

Gifts, meals, entertainment and travel can build goodwill between Vantage and our customers, suppliers and the community. Business decisions should never be based on gifts, meals, entertainment or travel. When we provide gifts, meals, entertainment or travel, we make sure they are reasonable in value, given transparently, and have a legitimate business purpose. We never give cash. We never ask for or solicit gifts, meals, entertainment or travel from anyone. We never ask any of our suppliers to provide gifts, meals, entertainment or travel on our behalf.

Choosing Suppliers

We always strive to select the best suppliers and secure the best possible terms for the company. While price, reputation and ability to deliver are always considerations in choosing suppliers, we also require our suppliers to conduct business ethically, fairly and in compliance with all applicable laws and regulations.

We only work with suppliers who meet our high standards for integrity, respect and transparency. A supplier's failure to meet these standards or failure to comply with applicable laws and regulations can result in termination of their relationship with Vantage. If you suspect any supplier is not meeting our standards for ethical behavior, you should disclose this as soon as possible to your manager/supervisor or the Legal Department.

Environmental, Social and Corporate Governance

We incorporate Environmental, Social and Corporate Governance (“ESG”) principles across our business to create long-term value. This core value is foundational in the way we conduct business and in the way we build and maintain our culture. Our customers have come to expect it just as we demand the same from our partners and vendors. We are committed to being a responsible global citizen and a good neighbor as we build the digital infrastructure for today and the next generation.

Environmental: We are committed to protecting our environment. Environmental sustainability is seen through a broad lens at Vantage. We are dedicated to designing, building and operating sustainable data center campuses in ways that minimize the environmental impacts on our communities, from reducing our carbon footprint to using renewable energy sources and virtually eliminating water from our cooling systems. We aim to advance technology while remaining an exemplar of good corporate citizenship.

Social: We provide a safe and protected workplace and view employee diversity as one of our greatest strengths. A safe workplace means both physical safety—a workplace free from health and safety hazards—as well as a diverse workplace where people are included, supported and can be their authentic selves.

Corporate Governance: With a focus on policies, programs, training and reporting, we are transparent and accountable at every level, from our customers and employees to our communities, investors and board of directors.

6.0 your responsibilities



You are expected to uphold a high standard of integrity and ethical conduct, both for yourself and for Vantage. We expect all employees to be guided by both the letter and spirit of the Code of Conduct. Here are some of your responsibilities in helping all of us act ethically:

ACT WITH INTEGRITY AND RESPECT

Conduct yourself with integrity and treat co-workers, customers, suppliers and business partners with respect.

CREATE TRUST IN THE MARKETPLACE

Conduct business honestly, fairly and with transparency to protect Vantage's reputation.

FOLLOW THE RULES

Read, understand and comply with the Code of Conduct, Vantage policies and the law.

SPEAK UP

If you have a question, are unsure about what to do, witness a violation or see something that does not feel right, please raise this to your manager/supervisor, any other company manager or any member of the executive team.

COOPERATE

Fully cooperate with any internal company investigations.

The Code in action

When faced with a difficult decision or find yourself in an uneasy situation, ask yourself:

1. Is it legal?
2. Is it ethical?
3. Is it in line with the Core Values?
4. Would you be comfortable if your actions were made public?

If you need support or guidance, ask for help from Human Resources, Corporate Compliance or any member of our Executive Team.

To access the most recent Code of Conduct policy resources, visit the Corporate Documents icon on the (em)Power homepage.