

**Switch, Ltd.****11/10/2019****Environmental Sustainability Policy****I. Purpose**

This Environmental Sustainability Policy (the "Policy") represents Switch's sitting policy to meeting and maintaining its commitment to the renewable principles of additionality, locality, sustainability, advocacy, and compassionate stewardship in its power procurement, use, and operations. Switch is committed to the highest standards of environmental performance and sustainable design in all of our data centers, in the general course of day-to-day business and to improving and enhancing the company's performance and efficiencies over time. Sustainability is central to our business philosophy, and is the guiding principal to our data center designs and operations. Our founder and CEO has more than 500 patents and patent pending claims that not only help us deliver 100% uptime for our clients, but reflect our iconic focus on energy efficiency and innovation in reliability and sustainability.

Additionally, the operation of a data center requires rigorous attention to detail, to ensure mission critical integrity and continuity of operations in a way that supports Switch's renewable energy and sustainability initiatives. The following identifies several key touchstones necessary to align procurement, operational, and construction activities with Switch's sustainability policies. Notwithstanding the foregoing, Switch reserves the right to modify, revise or revoke this Policy, at any time.

II. Scope

This Policy applies to all Switch Activity and all Switch energy procurement.

III. Policy and Responsibility

The Policy is designed to ensure compliance with federal and state laws and regulations, to eliminate waste, carbon emission, and misuse of non-renewable resources, to facilitate Switch's sustainability initiatives by promoting efficiency, advocacy, and operational excellence. Any questions relating to this Policy should be directed to the Policy and Strategy Departments. Violation of this Policy or any Switch policies may result in disciplinary action, up to and including termination of employment.

IV. Leadership

As the global trail-blazer in sustainable data center design and operations, Switch is viewed as a thought leader in corporate citizenship. For example, 2017 Switch was the only technology company to obtain all "A's" by Greenpeace in its 2017 Clicking Clean Report, ranking above entities like Apple, Google, Facebook and Microsoft for sustainable policy, procurement, advocacy and energy use.

The Switch Sustainability Initiative has driven all Switch data centers in North America to be run by 100% renewable energy. Switch's issued and pending patent innovations in design, power, cooling and density resulted in significant efficiencies and outstanding annual PUE ratings. In addition to the Uptime Institute's Tier IV Gold standards, Switch Tech and Switch Design are so advanced they are praised as Tier 5@ Platinum or Tier "Elite". Switch meets and exceeds and/or assists its customers in meeting the following standards: IEEE, ANSI, ASHRAE, 24/7, ISO 9001, SAS 70/SSAE-16/SSAE-

18, SOC-1, SOC-2, SOC-3, BICSI, Green Grid Association, Green-e, and Data Center Standards Foundation Class 5 requirements.

Switch's realizes further efficiencies and operational optimization by maintaining an eighty-percent (80%) original equipment manufacturer ("OEM") requirement.

V. Sustainability Sitting Policy

Switch's sustainability sitting policy includes unyielding commitments to:

- Operate Switch data center facilities with 100% renewable electricity, implement policies and practices that further ensure we are proactive and responsible stewards of the climate and the environment, preventing harmful emissions whenever possible.
- Strive for optimal energy efficiency and tenets of sustainability in the design of our data center facilities, with a level of leadership and innovation that enables us to perform well above industry standards and invite others to do the same.
- Seek higher levels of performance, efficiency, and optimization with each new facility we build.
- Comply with all environmental laws and regulations applicable to our business, including design, construction and building permits; and advocate for advancements in such policies and standards.
- Be transparent and open in our communications about our efforts.
- Advocate for and participate in public policy and industry standards debate to help raise awareness, and champion sustainable initiatives and challenge the industry status quo with annual review of Switch standards and areas for improvement or leadership.

VI. Executive Sponsorship and Leadership.

This Policy is led from the top down. Under the direction and vision of Switch's CEO, Switch's Chief Compliance Office, Switch's EVP of Policy crafts these policies and works with Switch's EVP of Strategy to implement the same, with legislative and regulatory advocacy and support (collectively, "The Sustainability Team").

Together, the Sustainability Team develops the programs and practices to be implemented in support of Switch's sustainability sitting policy. Team members within the Strategy and Policy departments contribute to these initiatives on a day-to-day basis, and all Switch employees support our company posture to operate as green as possible. Switch's CEO reviews strategic sustainability plans and overall progress on a regular basis with sustainability of the world's digital infrastructure as a unyielding priority for Switch.

VII. Customer Transparency

Switch also provides customers with real time and annual reports into their energy usage so Customers can carefully and accurately determine their own carbon foot print and quantify how Switch's 100% green energy utilization helps them meet their own carbon reduction goals. Switch provides the same level of transparency to advocacy groups like Greenpeace, who ranked Switch in 2017 as the greenest technology company in the world, ahead of other illustrious entities like Apple, Google, and Facebook.

If you'd like to learn more about Switch's sustainability policy and standards please visit www.switch.com/sustainability. A comprehensive review of Switch's patented inventions that lift Switch's (and the industry's) sustainability standards to new heights is available at www.switch.com/patent-video.

VIII. Procedure

This Policy requires that all Switch employees act as guardians of Switch’s resources, operations, and sustainability goals. All employees are encouraged to identify areas for increase efficiencies, and rewarded for identifying innovative ways to further enhance Switch’s sustainability goals. of suppliers, providers, and contractors should be done in accordance with this policy and contracts with Switch should reflect the requirements herein, subject to departmental input and need. In no event should this Policy be used in a manner inconsistent with applicable law, which may change from time to time.

Date	Owner	Notes
11/10/2019	Sam Castor	Initial v.1.0
5/19/2020	Sam Castor	Annual Review

Sam Castor
Sam Castor, Executive Vice President of Policy

5/20/2020 | 11:46 PDT
Date