



**Environmental Procurement Policy**

**I. Purpose**

This Environmental Procurement Policy (the "Policy") represents Switch's best in class practices to procure goods and services in a manner that enhances the sustainability of our data centers, operations, and those of our suppliers. The purposes of the Policy include guidelines to ensure Switch is appropriately selective when identifying and managing the suppliers involved in its day-to-day operations and construction efforts. Building a new data center is a large, complex construction effort involving land management, multi-year planning, and careful management and oversight of contractor performance to maintain design and operational integrity for the infrastructure that powers the digital world. 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 key touchstones necessary to align procurement, operational, and construction activities with Switch's sustainability policies. Notwithstanding the foregoing, the organization reserves the right to modify, revise or revoke this Policy, at any time.

**II. Scope**

This Policy applies to all Switch Activity.

**III. Policy and Responsibility**

The Policy is designed to ensure compliance with federal and state laws and regulations, to comply with ISO 50001 purchasing requirements, to eliminate waste, carbon emission, and misuse of non-renewable resources, to facilitate Switch's sustainability initiatives by promoting efficiency 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 policy may result in disciplinary action, up to and including termination of employment.

**IV. Procurement**

As a global leader 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. In this vein, Switch will place a high propriety on procuring goods and services (even at a premium) to enhance the sustainability of our data centers and our operations.

While a policy cannot contemplate all scenarios, careful attention should be given to selecting suppliers of our most important and impactful commodities to ensure they 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.

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 the following standards:

1. IEEE
2. ANSI
3. ASHRAE
4. 24/7
5. ISO 27001
6. SAS 70/SSAE-16/SSAE-18
7. BICSI
8. Green Grid Association
9. Data Center Standards Foundation and many more.

Suppliers should be selected that align with and further Switch's historical record for setting and meeting transparent sustainability goals. Additionally, contractors and suppliers should not exceed Switch's commitment to the efficiencies and operational optimization inherent in maintaining an eighty percent (80%) original equipment manufacturer ("OEM") policy.

## **V. Construction**

Building any data center is a large, complex construction effort involving land management, multi-year planning, and careful oversight of contractor performance to maintain design and operational integrity for the infrastructure that power the digital world. The bar is even higher with construction and operation of Switch's Tier 5 Platinum data center ecosystems, which incorporate more than 500 patented and pending patent claims.

Switch Chief Construction Officer is responsible for the performance of construction and acquisition of equipment from suppliers across the country. Under the oversight of Switch's Founder and CEO Rob Roy, his team procures and selects firms to complete all phases of data center construction.

Contracts with these suppliers include requirements to comply with Switch's rigorous development standards, permit conditions, and land use authority rules. 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 Switch's internal certified Qualified Compliance Inspector of Stormwater and Preparer of Storm Water Pollution Prevention Plans.

Inspections are to be conducted on a weekly basis unless an unexpected event occurs that requires an inspection to be conducted more frequently and in accordance with any and all local, County, State and/or Federal requirements.

Suppliers who breach their obligations must be notified and managed through appropriate contractual, monetary, or legal actions as the case requires. This includes setting deadlines for remedial actions or improvements, if possible.

## **VI. Procedure**

This Policy requires that all use 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.

Reviewed and approved by Associate General Counsel.

<b>Date</b>	<b>Owner</b>	<b>Notes</b>
11/10/2019	Sam Castor	Initial v.1.0
5/19/2020	Sam Castor	Annual Review
4/11/2021	Sam Castor	Annual Review
4/4/2022	Lynnel Reyes	Annual Review
4/4/2023	Lynnel Reyes	Annual Review / Revision
5/2/2023	Lynnel Reyes	Revision