CoreSite Realty Corporation
Whistleblower Policy

Adopted February 23, 2011

CoreSite is committed to maintaining the highest standards of business conduct and ethics in its accounting standards and disclosures, internal accounting controls, audit practices, and general compliance with federal, state and local laws. It is CoreSite’s policy to comply with and require its directors, officers, and employees to comply with such laws and regulations. Every employee has the responsibility to assist the company in meeting these requirements. Even the best systems of control and procedures, however, cannot provide absolute safeguards against such violations. CoreSite has a responsibility to investigate and, if required, report to appropriate governmental authorities, any violations relating to corporate reporting and disclosure, accounting and auditing controls and procedures, securities compliance, other matters pertaining to fraud against stockholders, and any other violations of federal, state or local law, and to take appropriate action to remedy such violations.

This Policy governs the process through which employees and others, either directly or anonymously, can notify CoreSite’s Ethics Committee of potential violations or concerns. In addition, this Policy establishes a mechanism for responding to, and keeping records of, complaints from employees and others regarding such potential violations or concerns.

What is “whistleblowing”?

Whistleblowing may occur when an employee, applicant, or vendor discloses information when alleging willful misconduct carried out by an individual or group of individuals within an organization. In some cases, what constitutes “whistleblowing” is defined by applicable law. Reports can be internal or external. The first occurs when an employee raises their complaint internally, through designated channels in the organization. The latter occurs when an employee makes a report outside the organization, which may include to the media, law enforcement officials, or some other public entity.

This Policy is intended to cover serious concerns such as ethical or legal violations, including actions that:

- May lead to incorrect, inaccurate or misleading financial reporting;
- Are “unlawful”;
- Are not in line with company guidelines, including the Code of Business Conduct, the Insider Trading Policy, the Fair Disclosure Policy, or this Whistleblower Policy;
- Otherwise amount to serious improper conduct.

Reporting Alleged Violations or Concerns

If any employee becomes aware of any violation of a legal or ethical obligation, or any unfair or improper treatment of a customer, the employee must immediately report the matter so that it can be investigated right away. CoreSite takes such violations very seriously, and strongly encourages each employee to feel comfortable coming forward to the Company to work together to try to resolve any problem. In addition, where the situation warrants doing so, CoreSite and our employees remain free to engage in formal reporting to an authorized
In most cases, you should report a violation to your manager. Any manager or other supervisory employee who receives a report of an alleged violation must immediately forward the report to the Ethics Committee. CoreSite has contracted with NAVEX Global’s EthicsPoint, an independent, third-party service provider to provide a method for submitting reports of alleged violations to the Ethics Committee anonymously.

In cases of potential misconduct, individuals are encouraged to contact our Ethics Committee at ethics.committee@coresite.com or Human Resources department directly. In addition, employees and other stakeholders can report through our anonymous, confidential, third-party hotline.

If you prefer to report potential misconduct to American Tower, you can report through their anonymous, confidential, third-party hotline.

All reports of alleged violations, whether or not they were submitted anonymously, will be kept in strict confidence to the extent possible, consistent with the company’s need to conduct an adequate investigation.

Reports of alleged violations should be factual, rather than speculative or conclusory, and should contain as much specific detail as possible to allow for proper assessment. This is especially true if the report is being made anonymously. The complaint describing an alleged violation or concern should be candid and should set forth all of the information that the employee knows regarding the allegation or concern. In addition, the complaint should contain corroborating information to support the commencement of an investigation. CoreSite may, in its reasonable discretion, determine not to commence an investigation if a complaint contains only unspecified or broad allegations of wrongdoing without appropriate factual support.

Investigation of Complaints

Upon receipt of a complaint alleging a violation of any applicable law or internal policy, the Ethics Committee, or a designated member of the Ethics Committee, will convene a meeting for the purposes of making a determination as to whether a reasonable basis exists for commencing an investigation into the conduct alleged in the complaint. If the Ethics Committee or its designated member concludes that an investigation is warranted, it shall take appropriate measures to implement a thorough investigation of the allegations. The Ethics Committee shall have the authority to obtain assistance from CoreSite’s management, counsel or auditors, or to retain separate outside legal or accounting expertise as it deems necessary or desirable in order to conduct the investigation.

All action taken by the Company in response to a concern will necessarily depend on the nature and severity of the concern. This may include initial inquiries and fact-gathering to decide whether an investigation is appropriate and, if so, the form and scope of the investigation. Note that an investigation into concerns raised is not an indication that they have either been confirmed or rejected. The Company complies with the law in conducting investigations and expects that employees will cooperate with an investigation, except when voluntary compliance with an investigation is being requested. The Company also expects that employees will provide truthful information when participating in an investigation and, during the investigation, will keep matters related to the investigation confidential.
Corrective Action

The Ethics Committee is ultimately responsible for determining the validity of each complaint and fashioning, with the input of its advisors and CoreSite management, if requested, the appropriate corrective action. The Ethics Committee shall report any legal or regulatory noncompliance to CoreSite management and ensure that management takes corrective action including, where appropriate, reporting any violation to relevant governmental authorities.

Any director, officer, or employee deemed to have violated any law, rule or regulation, or any internal policy regarding accounting standards and disclosures, internal accounting controls, or matters related to the internal or external audit of CoreSite’s financial statements, may be subject to disciplinary action, up to and including termination.

No Retaliation

Employees should feel confident to report violations as described above or to assist in investigations of such alleged violations. CoreSite will not tolerate retaliation or discrimination of any kind by or on behalf of the company and its employees against any employee making a good faith complaint of, or assisting in the investigation of, any violation of government laws, rules, or regulations, CoreSite’s Code of Business Conduct and Ethics, internal policies regarding accounting standards or disclosures, internal accounting controls, or matters related to the internal or external audit of CoreSite’s financial statements, even if an investigation shows that there has not been a violation.

Filing a Retaliation Complaint. A whistleblower retaliation complaint may be filed directly with the Vice President of Legal, the Ethics Committee, or through the EthicsPoint program discussed above. A whistleblower retaliation claim must be filed within 6 years of the retaliation behavior or within 3 years of when the employee becomes aware of it.

Investigation of Retaliation Complaints. All retaliation complaints will be investigated. The Ethics Committee will convene a meeting for the purposes of making a determination about the investigation. The Ethics Committee may request any documentation or verbal statements by employees as may be legitimately required for appropriate fact finding.

Decision. If a finding that interference or retaliation has occurred, the Ethics Committee will provide that information to the CEO and President. The determination is final and binding. The President will ensure that, through the appropriate channels, corrective action is taken against the employee who is found to have interfered or retaliated. The CEO and President will communicate the determination in writing to the complainant, if known, and to the person or persons accused of violating this guideline. With regard to complaints where it is alleged that the President and CEO interfered or took retaliatory action, the finding of the investigation shall be presented for a decision to the Vice President of Legal.

Appeal. An employee may appeal a decision of CoreSite’s Ethics Committee to American Tower’s Ethics Committee only on the basis of whether the complaint is timely and qualifies for review under the scope of this Policy.
Compliance with this Policy

All employees must follow the procedures outlined in this Policy and cooperate with any investigation initiated pursuant to this Policy. Adhering to this Policy is a condition of employment. CoreSite takes seriously its duty to investigate and remedy any alleged violations or employee concerns and relies on each employee to ensure that CoreSite has an opportunity to undertake such an investigation.

However, this Policy does not constitute a contractual commitment on the part of CoreSite. This Policy should not be construed as preventing, limiting, or delaying CoreSite from taking disciplinary action against any individual, up to and including termination, in circumstances (such as, but not limited to, those involving problems of performance, conduct, attitude, or demeanor) where CoreSite deems disciplinary action appropriate.

This Policy in no way alters an employee’s at-will employment status with CoreSite. Either CoreSite or an employee can terminate the employment relationship at CoreSite at any time, for any reason or no reason, with or without cause, warning, or notice.