

## **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 Audit 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 can be defined as "disclosing information by an employee, applicant, or vendor who alleges willful misconduct carried out by an individual or group of individuals within an organization." It can be internal or external. The first occurs when an employee airs his or her complaint internally, through designated channels in the organization. The latter occurs when an employee blows the whistle outside the organization to the media, law enforcement officials, or some other public entity.

This Policy is intended to cover serious concerns that could have a large impact on a company such as actions that:

- May lead to incorrect 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;  
or
- 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 each employee should seek to resolve any problem within the company before reporting it to any outside person or entity.

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 Audit Committee Chair. The Audit Committee is composed entirely of directors of the company who are independent of the officers and management of CoreSite. 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 Audit Committee anonymously. EthicsPoint allows employees, independent contractors and consultants to report incidents either over the internet or by telephone. Both methods allow the reporting employee to remain anonymous, based upon the employee's choice and information they provide. Online reporting enables the employee to monitor action taken on the incident and continue to communicate with the company regarding the incident with anonymity maintained. (Note that this follow-up ability is not available when reporting via the telephone.) CoreSite employees may access the hotline at <http://www.coresite.com/ethics-hotline> or by calling 844-802-6642.

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. 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 sufficient 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 state or federal law or internal policy, the Audit Committee, or a designated member of the Audit 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 Audit 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 Audit 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.

At each of its quarterly meetings, the Audit Committee will discuss the status of any ongoing investigation and review the resolution of each complaint submitted during the previous quarter, whether or not the complaint resulted in the commencement of a formal investigation.

### ***Corrective Action***

The Audit 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 Audit 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 Chief Financial Officer, any member of the Audit 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 Audit Committee will convene a meeting for the purposes of making a determination about the investigation. The Chair of the Audit Committee may request any documentation or verbal statements by employees as may be legitimately required for appropriate fact finding. The employee filing the complaint may at the time of the hearing, present their complaint to the Audit Committee in person.

### ***Decision***

If a finding that interference or retaliation has occurred, the Chair of the Audit Committee will provide that information to the CEO. The determination is final and binding. The CEO will ensure that, through the appropriate channels, corrective action is taken against the employee who is found to have interfered or retaliated. The CEO 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 CEO interfered or took retaliatory action, the finding of the investigation shall be presented for a decision to the CFO.

### ***Appeal***

An employee may appeal a decision of the Audit Committee to the Board of Directors 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.