

CoreSite Realty Corporation
Foreign Corrupt Practices Act Compliance Policy

Adopted May 19, 2011

This Foreign Corrupt Practices Act Compliance Policy has been adopted to ensure that CoreSite Realty Corporation (“CoreSite”) and each of its subsidiaries and affiliated business entities complies with the general requirements of the United States Foreign Corrupt Practices Act (the “FCPA”), as well as the laws and regulations of each foreign country in which CoreSite conducts business (except to the extent inconsistent with United States law). This Policy applies to CoreSite and anyone acting on its behalf, including its directors, officers, shareholders, employees, independent contractors and consultants.

This Policy is not intended to be an explanation of all the specific provisions of the FCPA or an exhaustive list of activities or practices that could affect the reputation and goodwill of CoreSite’s business. This Policy should be considered a minimum standard. To the extent this Policy requires a higher standard than required by the FCPA or other applicable laws, rules or regulations, CoreSite requires adherence to these higher standards. The full text of the FCPA is available on the U.S. Department of Justice website at <http://www.justice.gov/criminal/fraud/fcpa/docs/fcpa-english.pdf>. In the case of any inconsistency between any of CoreSite’s other policies and this Policy, the provisions of this Policy will govern.

CoreSite is committed to a high standard of business conduct and integrity. This means all of CoreSite’s directors, officers and employees must comply with the spirit and the letter of applicable laws and regulations anywhere in the world where CoreSite conducts business. Should an improper practice or irregularity occur within CoreSite, we are committed to making all necessary corrections, taking remedial action to prevent recurrence and making timely and appropriate disclosure of the improper practices or irregularities to the proper authorities. All questions or problems concerning this Policy, interactions with foreign officials, or payment practices should be directed to CoreSite’s Compliance Officer.

At the time of adoption of this Policy, CoreSite’s activities outside the United States are limited and are not material to CoreSite’s overall business. If CoreSite expands its business operations or relationships overseas, our board of directors will revisit this Policy and consider the need for amendments to the Policy or other measures to help ensure compliance with the FCPA, such as FCPA training and procedures for CoreSite employees who deal regularly with overseas businesses.

FCPA Basics

The FCPA has two components: the bribery prohibition and the recordkeeping and internal control provisions. Violations of the FCPA may constitute both a civil and criminal offense. Liability may be imposed for “willful blindness”—the failure to follow up on FCPA “red flags.” The law carries harsh penalties and administrative consequences, including criminal and civil fines, imprisonment, disgorgement of profits secured through improper payments,

termination of U.S. government licenses, and exclusion from U.S. Government programs and contracting.

ANTI-BRIBERY POLICY

CoreSite officers, directors, employees, independent contractors and consultants are prohibited from paying, offering, giving, authorizing, or promising, either directly or indirectly, money or “anything of value” to any “government official” without prior approval of the Compliance Officer.

- **Anything of Value:** “Anything of value” includes not only cash, but also gifts, gift cards, logo goods and other tangible items, electronic equipment, clothing, meals, entertainment (for example, tickets or invitations to concerts, theater performances, sporting events or other similar events without a prevailing business character), travel, lodging, transportation, loans, use of property or equipment, charitable contributions, and job offers.
- **Government Official:** Officials or employees of federal, state, provincial, county, municipal, and similar officials of any government or any department or agency thereof; any officers or employees of a company or business owned in whole or in part by a government (“state-owned enterprise”); any officers or employees of a public international organization (for example, the World Bank, United Nations, or the European Union); any foreign political party or official thereof; or any candidate for political office. Government officials include officials at every level of government, regardless of rank or position. Under this Policy, “government officials” also include spouses and other immediate family members of government officials. Payments to dependents of officials will be treated the same as payments directly to the officials themselves. Payments to other relatives must also be scrutinized in advance, and safeguards imposed, to protect against the risk that the relatives could act as conduits to the official.

Due Diligence

To protect against the business and legal risks of dealing with third parties who do not share CoreSite’s commitment to fair dealing, CoreSite must carefully choose its partners and representatives. Therefore, prior to entering into an agreement with any agent, consultant, joint venture partner or other representative who will act on behalf of CoreSite with regard to foreign governments on international business development or retention, CoreSite will perform appropriate FCPA-related due diligence and impose prudent safeguards against improper payments. Contracts with representatives who will interact with foreign governments on international business development or retention must be approved by the Compliance Officer or CoreSite’s Legal Department (the “Legal Department”).

Red Flags

One of the key aspects of FCPA-related due diligence investigations is the identification of “red flags” that may indicate the potential existence of an FCPA problem. The following is a list of some commonly encountered “red flags”:

- Companies with significant overseas operations
- Operations in countries with high risk for bribery (i.e. Southeast Asia, Middle East)
- Operations in high risk industries (i.e. defense, aircraft, oil, engineering, construction)
- Requests for payments in cash
- Reimbursement requests for inadequately documented expenses
- Acquisitions of foreign subsidiaries
- Joint ventures with foreign government entities
- Foreign consulting/agency relationships
- Large payments to foreign agents relative to local prevailing rates for services provided
- Use of a non-affiliated local sales representative
- Requests for payment in a country other than where the company's operations are located or where the service provider is located
- Refusal to provide FCPA representations
- Unusual bonuses paid to foreign operational managers
- Unusual payment arrangements to vendors
- Commissions inconsistent with the going rate
- "Public red flags" such as political contributions, payoffs, bribes, kickbacks or excessive rebates

Pre-Hiring Due Diligence

Whenever CoreSite intends to engage or retain an agent, distributor, marketing consultant or other third party that will have (or is reasonably expected to have) interactions with foreign entities, foreign officials, any foreign political party or official thereof, or any candidate for foreign political office, CoreSite will conduct a due diligence inquiry of the prospective third party in order to determine the reputation, beneficial ownership, professional capability and experience, financial standing and credibility of the prospective third party and the history of such prospective third party's compliance with applicable provisions of the FCPA or similar applicable laws in other countries. The specific information to be obtained in connection with such due diligence shall be specified by, and the results of such investigation shall be reviewed and approved by, the Legal Department.

Key information concerning prospective third parties shall be recorded in a due diligence questionnaire that must be certified as correct by the relevant prospective third party and such third party's direct contact at CoreSite. Additional due diligence may be required depending on the third party's risk profile results. Files supporting CoreSite's third party due diligence shall be maintained by the Legal Department and updated from time to time as necessary to manage CoreSite's compliance.

Agreements with Contractors

Agreements with third parties that will have (or are reasonably expected to have) interactions with foreign entities, foreign officials, any foreign political party or official thereof, or any candidate for foreign political office, will contain a provision in substantially the following form, in addition to other terms as may be deemed to be necessary from time to time:

"Neither party, nor any of its respective subsidiaries or affiliates, directors, officers, employees, agents or subcontractors, shall make any payment or give anything of value,

directly or indirectly, to any government official (including any director, employee or agent of any government department, agency or instrumentality) to influence any of his, her or its decisions, for the purpose of obtaining or retaining business or to gain any other advantage, or for any improper purpose, except that the foregoing shall not apply to payments to facilitate or expedite performance of a routine governmental action as permitted by the U.S. Foreign Corrupt Practices Act, as amended.”

Post-Hiring Monitoring

Once CoreSite retains a third party, employees have a responsibility to continue monitoring ongoing activities for any FCPA red flags or concerns. If any employee knows or reasonably believes that a payment or promise of payment prohibited by the FCPA has been made or may be made by an agent, distributor, consultant or other third party intermediary for or on CoreSite’s behalf, the employee shall immediately advise the Legal Department and, in the case of anticipated payments or promises of payment, shall use all reasonable efforts to prevent the payment or promise from occurring.

Acquisitions

Whenever CoreSite pursues the acquisition of any business entity, the due diligence process associated with the proposed acquisition shall include an inquiry of the acquisition target’s compliance with the FCPA. The specific information to be obtained in connection with such investigation shall be specified by, and the written results of such investigation shall be reviewed and approved by, the Compliance Officer and the Legal Department.

Joint Ventures

Whenever CoreSite elects to form a joint venture outside the United States, we will conduct a review of the prospective joint venture partner or partners in order to determine the reputation, beneficial ownership, professional capability and experience, financial standing and credibility of the prospective joint venture partner or partners and the history of their compliance with the FCPA and similar laws in other countries. The specific information to be obtained in connection with such investigation shall be specified by, and the written results of such investigation shall be reviewed and approved by, the Compliance Officer and/or the Legal Department.

Penalties, Fines and Imprisonment

Penalties for violation of the anti-bribery provisions of the FCPA include fines of up to \$2 million per violation for companies and fines of up to \$100,000 and/or imprisonment for up to five years per violation for individuals. The FCPA prohibits a company from reimbursing a director, officer, employee, or consultant for the amount of the fine involved. Individuals are subject to criminal liability under the FCPA regardless of whether the company has been found guilty or prosecuted for a violation. ***Violation of this Policy may also result in disciplinary action up to and including termination of employment by, or association with, CoreSite.***

RECORDKEEPING AND INTERNAL CONTROL POLICY

The FCPA also requires CoreSite to keep books, records and accounts in reasonable detail that accurately and fairly show CoreSite's assets and how CoreSite's money has been spent. A system of internal accounting controls must be maintained to provide reasonable assurances of adequate internal controls over the accounting and reporting activities at all levels.

The record-keeping and accounting provisions of the FCPA apply to all transactions, not just those that could be viewed as illegal payments. Under the FCPA, if CoreSite has a majority interest in a joint venture, CoreSite is required to comply with the FCPA accounting and recordkeeping requirements. When CoreSite has a minority interest, we are required by law to make a good faith effort to request that the joint venture comply with these FCPA internal accounting controls and recordkeeping requirements. Many cases under the FCPA are brought under these "controls" provisions of the FCPA.

CoreSite has adopted a system of internal accounting and operating controls and procedures that must be strictly adhered to by all directors, officers, employees, independent contractors and consultants involved in providing financial and business transaction information to and within CoreSite so that all underlying transactions are properly documented, recorded and reported. These internal controls are the backbone of the integrity of CoreSite's financial records and financial statements

Each director, officer and employee must promptly report to the Compliance Officer any actual or suspected breach or violation of CoreSite's internal accounting controls that come to their attention.

Each director, officer and employee must also promptly report to the Compliance Officer any actual or suspected fraudulent or questionable transactions or occurrences that come to their attention. Potentially fraudulent transactions include, without limitation, embezzlement, forgery or alteration of checks and other documents, theft, misappropriation or conversion to personal use of company assets, and falsification of records.

Because of its importance, directors, officers, employees, independent contractors and consultants are all encouraged to bring to the attention of the Compliance Officer any changes that they believe may improve CoreSite's system of internal controls.

Each director, officer and employee shall be candid in discussing matters concerning our internal controls and business disclosures with CoreSite's management, internal auditors, outside auditors, outside counsel and directors. Factual information is important. Opinions and observations are strongly encouraged.

Penalties, Fines and Imprisonment

Any director, officer and employee who willfully violates the record keeping provisions of the FCPA or any person who willfully and knowingly makes, or causes to be made, any statement in any application, report, or document required to be filed in violation of those provisions may be fined up to \$5 million, or imprisoned for up to 20 years, or both. Violations of the FCPA may also expose CoreSite and its directors, officers, employees, independent

contractors and consultants to additional governmental or private action and penalties under United States and/or foreign laws and treaties. CoreSite is not permitted by law to pay fines imposed on its directors, officers, employees, independent contractors or consultants for FCPA violations. ***Violation of this Policy may also result in disciplinary action up to and including termination of employment by, or association with, CoreSite.***

QUESTIONS?

Although on the surface the FCPA's requirements and prohibitions seem straightforward, in practice FCPA issues are often difficult. Every CoreSite officer, director or employee whose duties are likely to lead to involvement in or exposure to any of the areas covered by the FCPA is expected to become familiar with and comply with this Policy to avoid inadvertent violations and to recognize potential issues in time for them to be appropriately addressed.

If you have questions or problems concerning this Policy, interactions with foreign officials, or payment practices, you should contact the Compliance Officer or the Legal Department.