1. **Introduction**

Cologix is proud to house the most robust, scalable data center ecosystem in North America, and our success relies on the success of a larger ecosystem of partners. We know when the ecosystem thrives, we thrive. Only then are we positioned to create value that benefits all of our stakeholders. To that end, Cologix is committed to leading with our values and putting trust and accountability at the center or our work. We are steadfast in our commitment to strong ethical business practices and extend that commitment to our supply chain partners, vendors, and all other third parties and affiliates from whom Cologix procures goods and services. We work to choose suppliers whose values match our own, and we expect our suppliers to operate ethically and in compliance with the law.

Our Supplier Code of Conduct (the “Supplier Code”) outlines the standards of legal and ethical behavior Cologix expects of its suppliers. The Supplier Code aligns with our Code of Ethical Standards, Business Practices and Conduct (the “Code”), which applies to employees, officers, and directors at Cologix, and it can be found at [www.cologix.com](http://www.cologix.com).

Cologix expects to develop productive and mutually beneficial working partnerships with our suppliers based upon trust, honesty, integrity and fairness. Cologix believes in doing business only with those companies that demonstrate the highest business standards for ethics and integrity. Cologix will make purchasing decisions based upon overall value, and in addition to price, Cologix will consider other factors, including quality, reputation for integrity and service, delivery capabilities and the suppliers’ overall relationship with the company.

As a Cologix supplier, you are responsible for reviewing and understanding the Supplier Code. We expect our suppliers to establish and maintain policies and procedures that ensure their, and their affiliates’, employees, contractors, and agents understand and comply with the Supplier Code at all times.

Suppliers should contact Integrity@Cologix.com with any questions or concerns related to the Supplier Code. Cologix values the contribution its suppliers make to the success of Cologix and building mutually beneficial relationships.

1. **Guiding Principles**

*Compliance with Laws, Rules, and Regulations:* Cologix and its business partners regularly conduct business in many countries and, as a result, may be subject to many different laws, rules and regulations. We expect all suppliers to obey all applicable laws, rules, and regulations.

*Compliance with Cologix Procedures and Policies:* Cologix regularly evaluates the policies and standard operating procedures that govern how business should be conducted in and with Cologix. We will outline these standards in policies, such as this Supplier Code of Conduct, and in supplier contracts. We expect our suppliers to adhere to all Cologix policies and standard operating procedures during the term of our business relationship.

1. **Standards of Ethical and Legal Behavior**
2. *Anti-corruption and Bribery:* Cologix adheres to the highest global standard regarding anti-corruption and anti-bribery laws. Our suppliers are expected to operate with the same standards, and may not participate in bribes, kickbacks, or any other payments whether directly, indirectly or through a third party to public officials, business partners, or potential business partners.
3. *Gifts and Entertainment:* It is prohibited for suppliers to provide gifts or entertainment to Cologix's employees with the expectation of retaining or gaining advantage in our business relationship or improperly influencing a Cologix employee’s actions. Cologix’s employees may accept marketing items bearing the trademark or logo of suppliers and partners if those items are of nominal value and extended only as a business courtesy and not in the direct sourcing or procurement process. Suppliers should never offer to Cologix’s employees gifts during an ongoing vendor selection process.
4. *Disclosing Conflicts of Interest*: Cologix employees are prohibited from making or participating in the making of a decision if a financial or personal conflict of interest exists. Specifically, a Cologix employee may not be involved in purchasing decisions involving purchases from employees, employee‐owned businesses, relatives and near relatives or businesses owned by near relatives. Suppliers must promptly disclose to Cologix all potential conflicts of interest, including conflicts of interest based upon ownership by, or benefits to, Cologix employees, relatives or near relatives. Such disclosure must be made even if the potential conflict is created after an award has been made.
5. *Antitrust, Competitive Behavior and Fair Dealing:* All transactions must conduct business honestly and ethically and within the frameworks of a free market. Cologix competes fairly and follows all applicable antitrust and competition laws and expects our suppliers to do the same. Our suppliers should not:
	* participate in price fixing, restrictions or adjustments to pricing and contractual terms with any key competitor;
	* boycott suppliers or customers;
	* divide or allocate markets, territories or customers with any key competitors;
	* otherwise discuss, plan, or arrange to unreasonably restrain competition; or
	* fail to disclose to Cologix potential conflicts of interest.
6. **Social Responsibilities**
	1. *Human Rights:* Cologix expects our suppliers will share our commitment to respecting human rights across our supply chain. Suppliers should comply with all international human rights principles including, but not limited to, the Trafficking Victims Protection Act and the UK Modern Slavery Act of 2015. Ultimately, this means treating all individuals with respect and dignity, ensuring a lack of violence or harassment in the supply chain, and prohibiting the use of forced or involuntary labor of any kind.
	2. *Prohibition on the Use of Child Labor:* Child labor must not be used under any circumstance. Suppliers should not employ anyone under the age of 15, or under the legal minimum working age for employment in the applicable jurisdiction, whichever requirement is most restrictive. In addition, suppliers should not permit any workers who are under the age of 18 from performing work that is likely to jeopardize their health or safety, including unreasonable night work, overtime, lifting and working with toxic or hazardous materials.
	3. *Anti-Discrimination:* Cologix promotes a policy of equal opportunity employment and business opportunity without regard to age, race, color, region, sex, national origin, sexual orientation, gender identity, disability, or veteran status. We expect all suppliers to promote the same anti-discrimination policies in their work.
	4. *Fair Labor and Wages:* Suppliers should ensure their workers are compensated in compliance with all applicable wage laws including minimum wages, overtime hours, maximum work hours, and respect for free association and collective bargaining.
	5. *Employee Health and Safety:* Cologix is dedicated to ensuring our employees and contractors work in an environment that is safe and prioritizes employee health and safety. We expect suppliers to comply with all applicable laws and regulations related to occupational health and safety, ensuring their employees, contractors, and agents are adequately trained and equipped to remain safe at work whether on our sites or other sites.
	6. *Environmental Excellence:* Cologix is committed to best-in-class environmental management and expects our suppliers share our ideals in protecting our environment. Our suppliers should demonstrate their commitment to environmental excellence by complying all applicable environmental laws, regulations and standards. We may also periodically ask suppliers to provide information regarding environmental activities and results in their direct operations and supply chain related to CO2 emissions, energy, water, waste, and other key topics. Suppliers should respond in a timely manner to reasonable requests and Cologix will do the same.
7. **Fair Business Practices**
	1. *Business Record Keeping and Contractual Relationship Management:* Cologix works to ensure our financial books, records and accounts accurately reflect transactions and events and conform to generally accepted accounting principles and to the Company's system of internal controls. We expect our suppliers to employ similar controls and act with good faith in all financial, contractual and record keeping activities throughout the course of our business relationship.
	2. *Honest and Fair Dealings:* Suppliers should not make any false representations to Cologix during the course of business development or in the course of our relationships including false documentation, fraudulent or forged documents, or inaccurate records.
	3. *Privacy:* Cologix’s data centers are ISO/IEC 27001:2013 certified. ISO/IEC 27001:2013 certification and the Cologix portfolio of information security, information privacy and other industry recognized certifications represents our dedication to insuring the confidentiality, integrity and availability of company and customer information systems and assets. We expect suppliers to join in our commitment to privacy and cyber security by understanding and complying with all applicable laws and regulations related to data protection, privacy, and information security.
8. **Reporting Concerns or Violations**

Cologix expects our suppliers will follow the standards outlined in this Code of Conduct and will bring concerns or reports of violations directly to Cologix in a timely manner via Integrity@Cologix.com.