



A Digital Realty and Brookfield Infrastructure JV

Code of Conduct

Version 1.2 – (2022)

Ascenty is a company that values flexibility and agility when delivering its services. The company behaves ethically and practices good professional conduct towards all of its stakeholders, be they suppliers, customers, employees, regulatory agencies, and society at large. Always aiming to honor the commitment of delivering the best data center and telecommunications service in Latin America.

- **We Are Flexible**

We are open to change and to new ideas.

- **We Are Ethical**

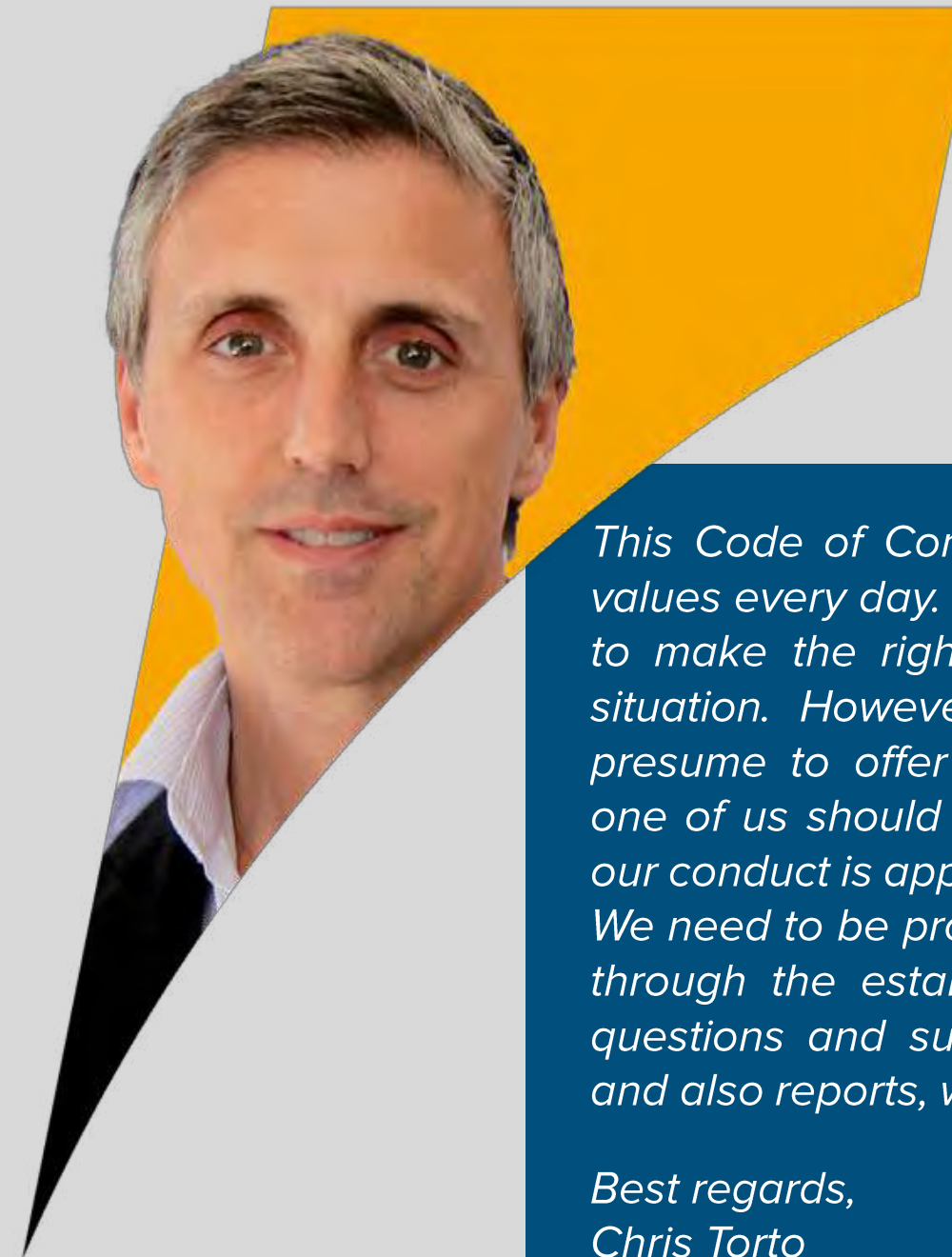
We believe the means are just as important as the ends.

- **We Are Agile**

We don't leave for later what we can do now.

- **We Are Committed**

We value the quality of our solutions, our team spirit, and our social and environmental responsibility.



This Code of Conduct will help us live these values every day. It works as a guideline for us to make the right choices in each business situation. However, this document does not presume to offer all the answers, and each one of us should stop and reflect on whether our conduct is appropriate.

We need to be proactive and seek out support through the established channels to answer questions and submit suggestions, warnings, and also reports, when necessary.

*Best regards,
Chris Torto*

Ethical Relationships

Being ethical means everything pertaining to people's moral behavior and our posture in social situations. Ethics guide our behavior as an organization. Doing the right thing is one of Ascenty's values.

Here are some of the values that comprise ethical behavior:

1. Integrity

Dedicating yourself completely and wholeheartedly. Acting ethically, consistently, and professionally.

2. Respect

Being considerate of other people's motivations and understanding every point of view involved. Hearing opinions. Building consensus.

3. Confidence

Judging yourself capable. Understanding your potential and your limitations. Always striving to overcome your limitations. Believing in yourself and in others. Contributing to the group.

4. Dignity

Having self-respect and caring about yourself. Infusing respect with the authority resulting from knowledge and experience.

5. Justice

Offering everyone what they are entitled to. Understanding the impact of each of our decisions. Adopting positions with wisdom, courage, and generosity.

6. Independence

Using knowledge to always offer the best solution. Acting impartially. Being able to decide your own fate.

7. Fairness

Understanding you are part of something bigger, recognizing everyone's contribution. Fighting any and all kinds of discrimination, including those based on race, creed, gender, and sexual orientation.

8. Positivity

Being able to take a light-hearted and creative approach. Finding meaning and satisfaction in what you do.

Fair Competition

Brazil's Antitrust Act (Law 12,529 of 2011) is intended to ensure fair and balanced competition in the marketplace, establishing it as a constitutional right. Our relationship with our competitors is respectful, ethical, and based on good business practices as well as the laws of Brazil.

Ascenty abhors any conduct that restricts competition, such as entering into agreements with competitors with regard to bids, conspiring to fix prices, share markets, or create or maintain monopolies or oligopolies.

When doing any business or acquiring any product or service on behalf of Ascenty, make sure you are not committing any economic violations. If you have any legal questions, please ask the Legal department for guidance.

Excuse yourself from any meeting, including those of class associations or corporate entities, where you would be in the presence of representatives of competitors in your market segment and where matters pertaining to competition arise. In addition, make sure that there is a record of your exit. At the earliest opportunity, notify your manager and the Compliance team about what transpired.



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Anti-Bribery Policy

Our policy is to conduct our business activities in an **honest** and **ethical** manner.

We have a zero-tolerance approach towards bribery and corruption. We are committed to acting professionally, with fairness and integrity across all of our business dealings and relationships wherever we operate. We value the implementation of effective anti-bribery and anti-corruption systems.

We maintain all applicable anti-bribery and anti-corruption standards and controls across all jurisdictions where we operate.

All reports will be reviewed in a fair and transparent manner by the Compliance team, which operates independently within Ascenty, and all due corrections will be applied in the event of conduct or ethical violations.





Compliance with laws, rules, regulations, and policies

We operate in different jurisdictions and are subject to different laws, standards and rules. You must be aware of and comply with those applicable to your position, and ignorance of them is not an excuse. The Company has corporate policies with which you should be familiar as they govern your trading activities, business practices and other conduct as an Ascenty employee.



Political contributions

Ascenty does not make any political donations and does not allow its suppliers to make them on behalf of Ascenty, in cash or otherwise. The company does not support any political parties or candidates, since this could be perceived as an attempt to obtain undue business advantages.



Facilitation payments and bribes

Facilitation payments are a form of bribery whose purpose is to expedite or facilitate a routine public process, and not to obtain or retain business activities or any other undue business advantage. Facilitation payments are expressly prohibited.

Gifts and Hospitality

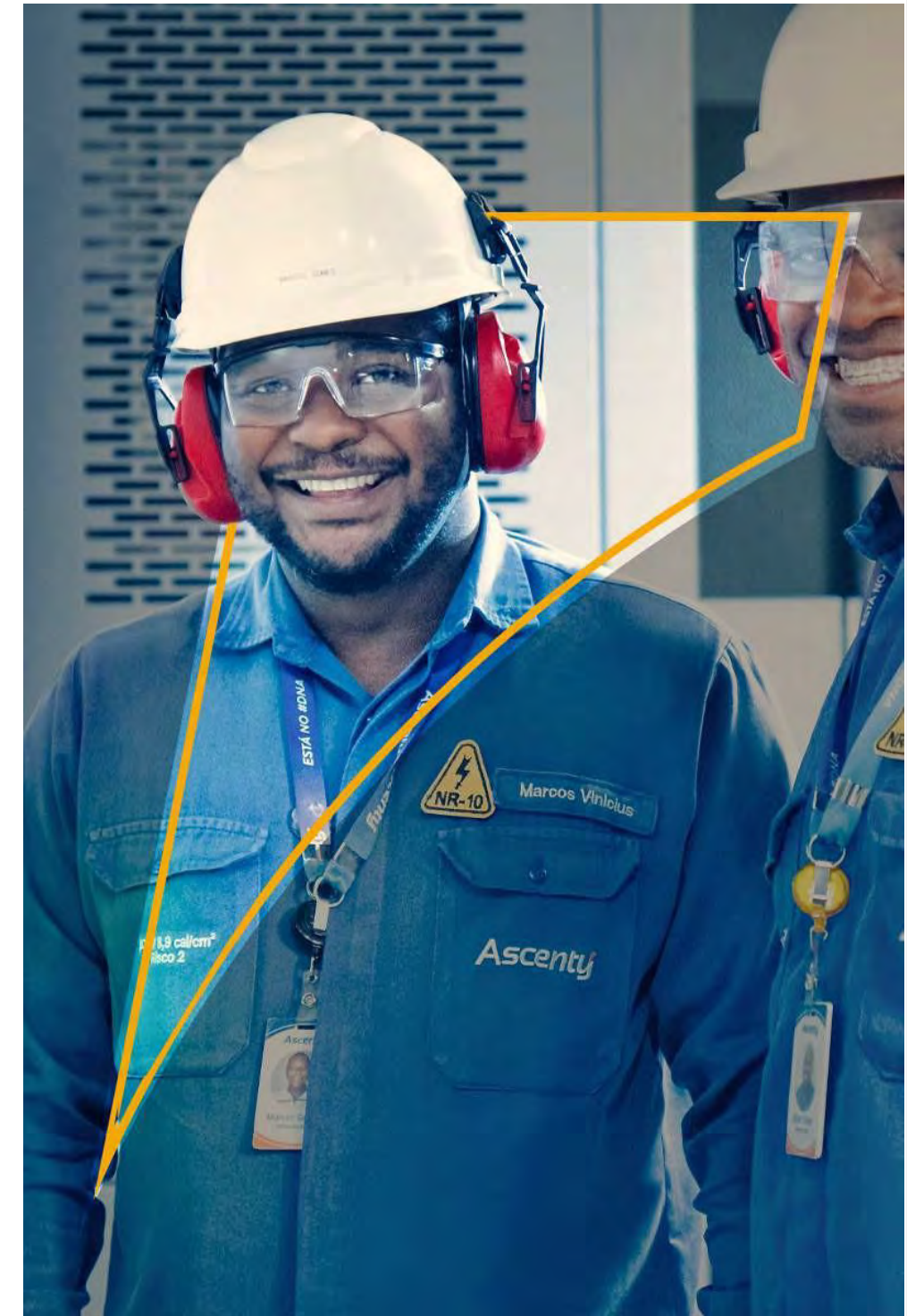
Employees must not offer or receive any gift or hospitality that may be deemed unlawful, inappropriate, or in violation of the recipient's policies.

The amount of the gifts per year value can't exceed BRL 250.00, also it's prohibited if:

- any amount of money is involved;
- any favor or benefit is expected or suggested in return;
- such gift is a lunch, dinner, or another meal;
- such gift is a benefit (travel, training courses, etc.) paid for by third parties.

Ascenty's compliance team must be informed of all gifts and hospitality received, through its own form.

If it is inappropriate for the employee to refuse a gift, it may be accepted and subsequently delivered to the compliance team, so that the gift may be distributed to the company as a whole or donated for charity.





Fairs and events sponsored by third parties

Invitations to trade shows or events sponsored by third parties must be approved by the line manager and informed to the Compliance team. Consideration must be made as to the topic of the trade show or event, and sufficient proof must be provided to show that the event will benefit Ascenty's activities.

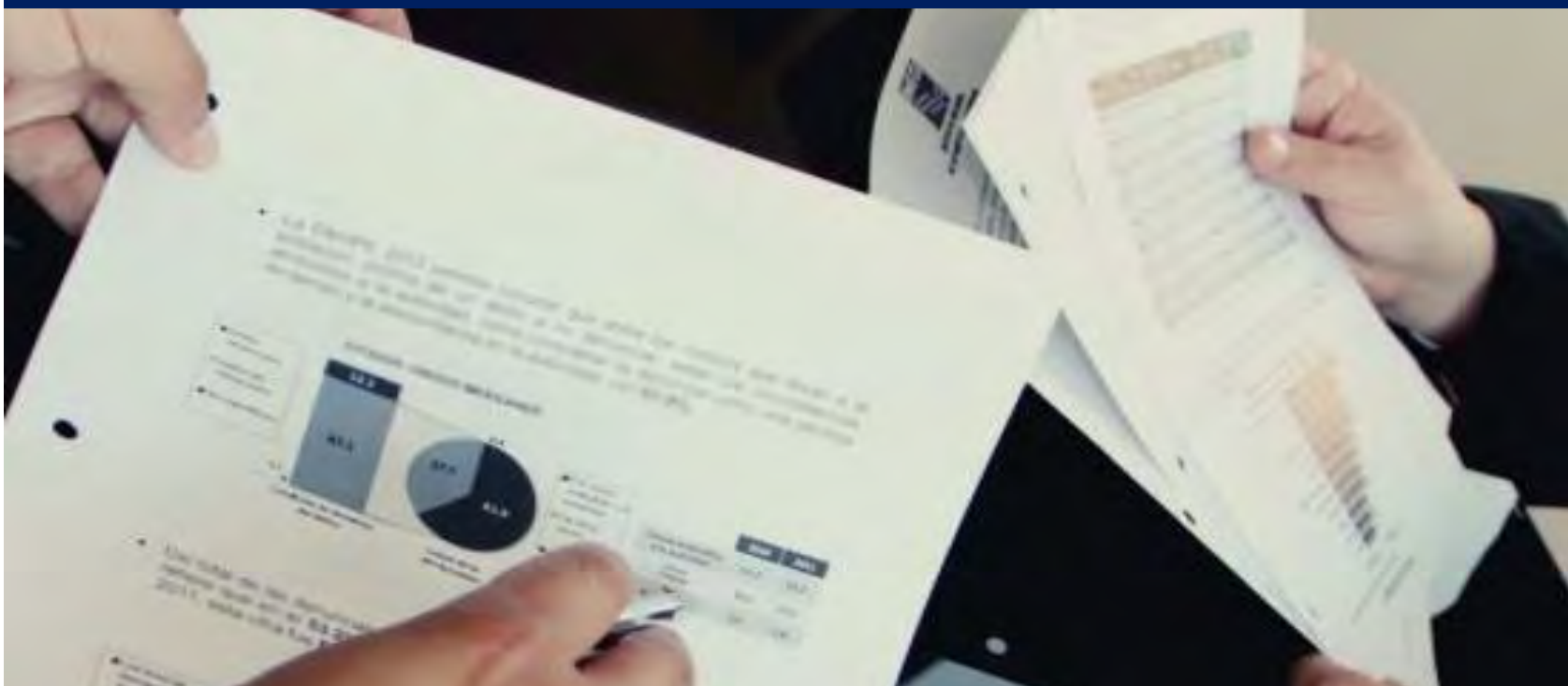


Employee Conduct

Ascenty seeks to constantly attract, retain, and develop its employees. It values diversity of experience and knowledge and encourages employees to grow personally and professionally.

To this end, we act in compliance with Brazilian standards, regulations, and legislation and maintain a dignified, responsible, and fair workplace.

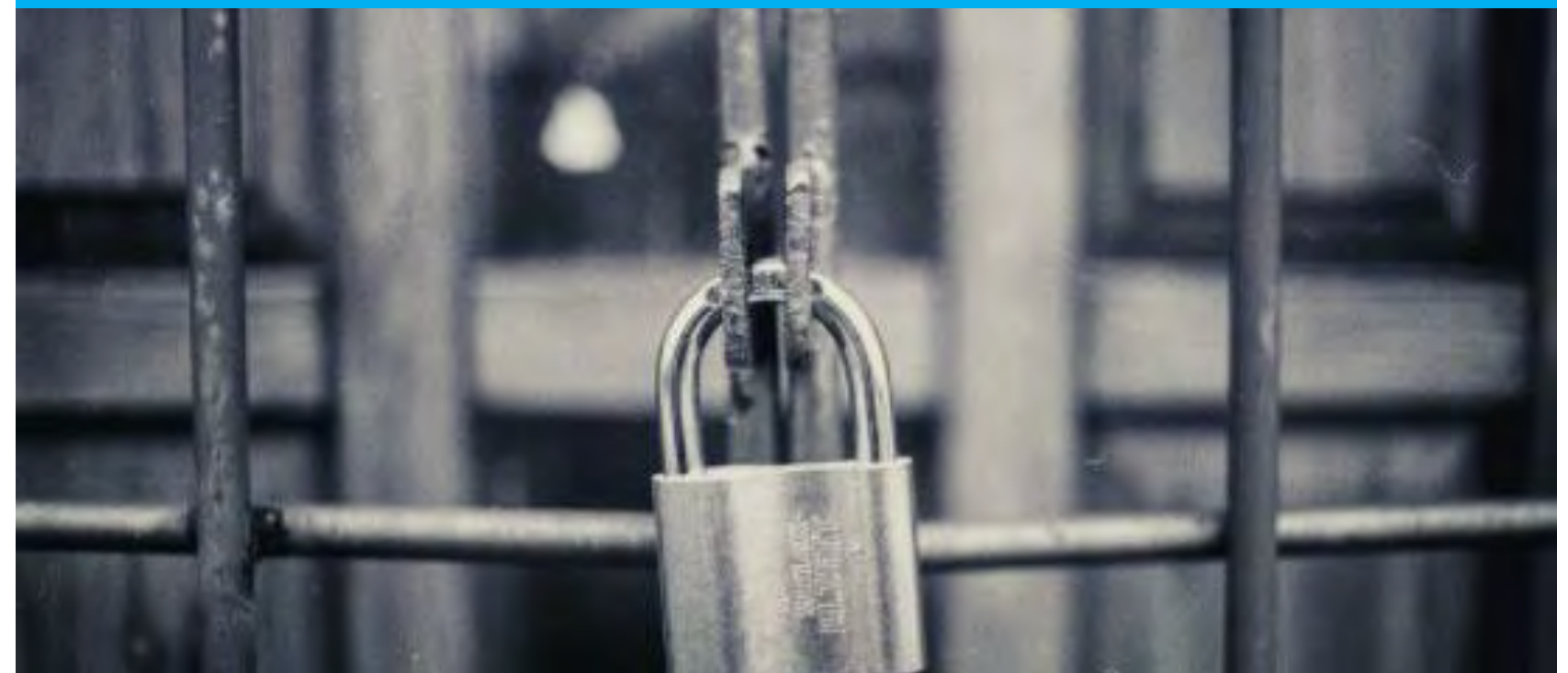
Ascenty encourages employees to question any instruction that contradicts the company's principles and values.



Bribes from third parties

Ascenty does not tolerate any bribery by third parties to secure business negotiations or to favor such third parties in negotiations.

In the event of questions or concerns about gifts, contact the Compliance team for more details.



Employee protection

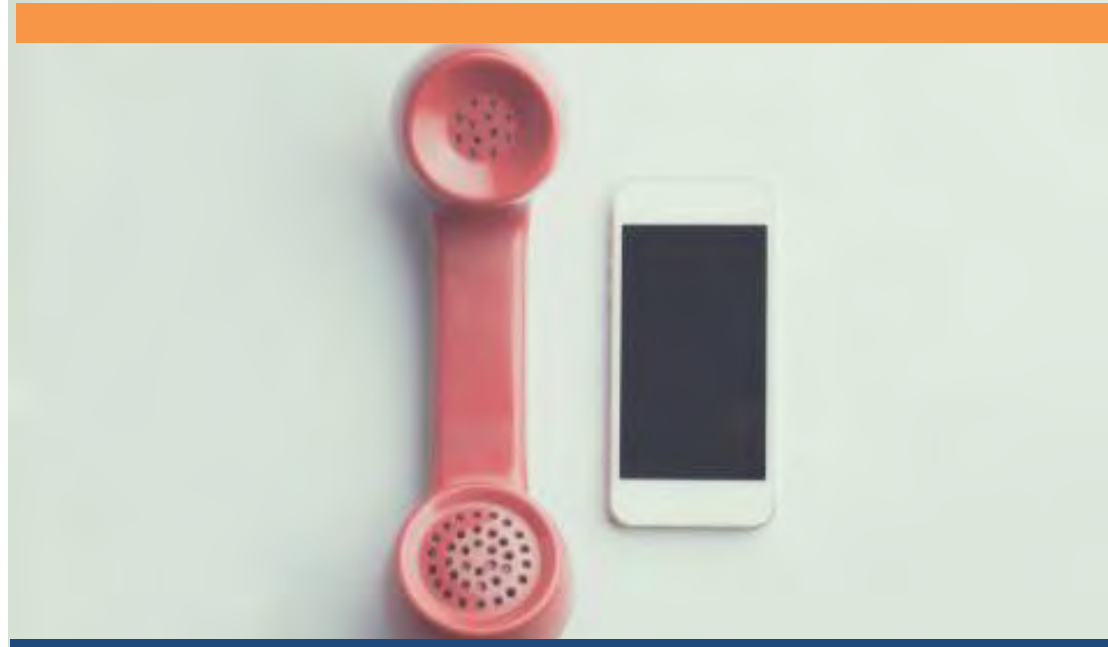
Ascenty is committed to ensuring that no one suffers any kind of ill treatment for not participating in acts of bribery or corruption, or for voicing, in good faith, suspicions of actual or potential bribes or any other act of corruption that has occurred or may occur in the future. Therefore, it strives for transparency and supports anyone who raises genuine concerns in good faith under this policy, even if done by mistake.

If anyone believes they have suffered any detrimental treatment, they should notify the Compliance team immediately. If their concern is not solved, it should be escalated to a Director.



Third-party protection

If the third party (suppliers and clients) feels harmed by any act of bribery or corruption committed by an Ascenty employee, in any business dealing, please contact Ascenty's Compliance team. It will investigate the issue and take the appropriate internal actions. It is important to emphasize that we guarantee that the third party will be treated in accordance with the best practices and with complete transparency and integrity.



Reporting violations

Employees and third parties are encouraged to voice their concerns regarding any issue or suspected negligence as soon as possible. The matter must be reported immediately to the Compliance team, either in person or through the reporting channels available. If you are not sure whether a certain action constitutes bribery or corruption, it should be assessed by the Compliance team so that it may properly address each event and take appropriate action.



Incident or violation

Employees and third parties who breach this Code of Conduct or Ascenty's Policies are subject to penalties. Depending on the gravity of the situation, these penalties may result in termination of the employment contract, in the case of employees, or immediately terminating any contracts, in the case of third parties (suppliers and customers).

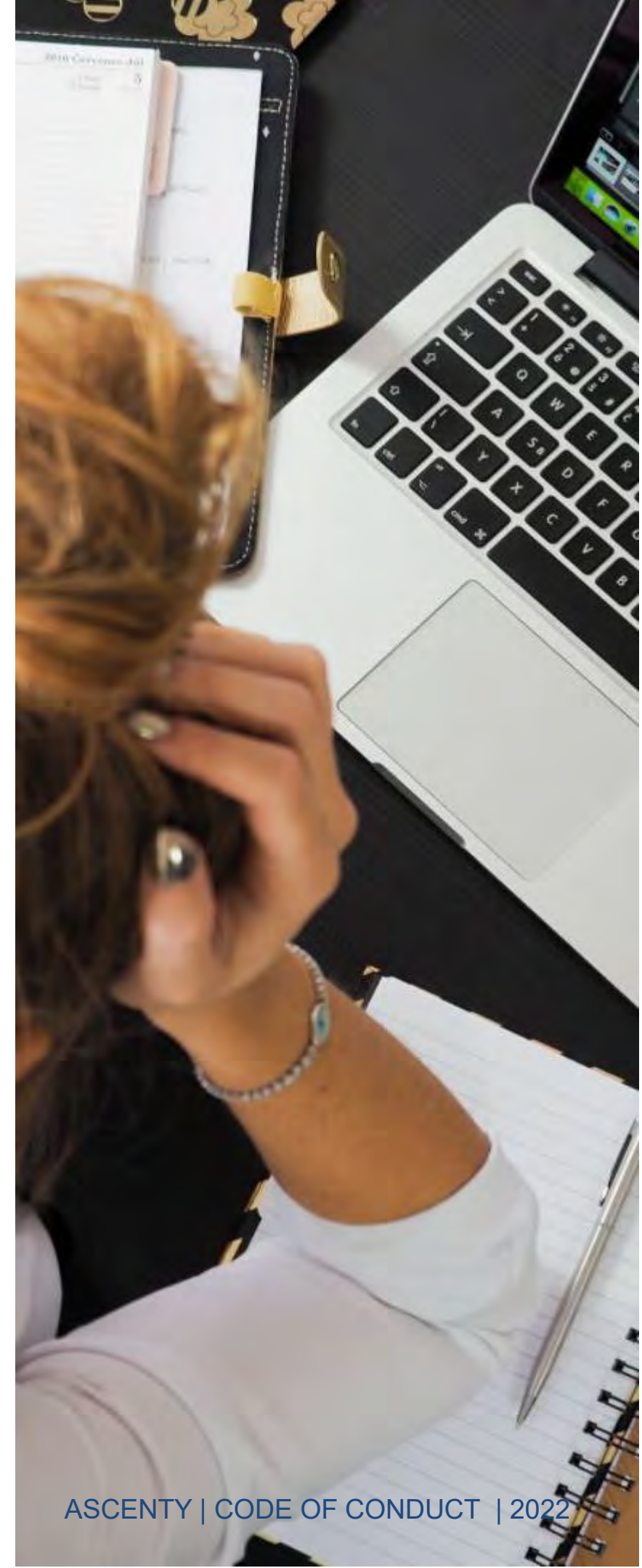
It is important to emphasize that, if the action violates the laws of the country where the operation was established, the offender will be subject to prosecution by the appropriate agencies, as well as to civil and criminal penalties.

Harassment

Harassment means any action, conduct, or behavior that an individual or group of individuals may consider inappropriate, humiliating, intimidating, or hostile. We should avoid actions and behavior that are or may be interpreted as moral, sexual, or any other type of harassment. Furthermore, we should all be careful when it comes to actions or behaviors that may be acceptable in one culture, but not in another.

Moral harassment: This is defined as exposing professionals to embarrassing and humiliating situations at the workplace, repeatedly and for an extended period of time. It's what is known as "moral violence." These actions aim to humiliate, disqualify, and emotionally destabilize the victim's relationship with the organization and workplace, which may put their health or their job at risk.

Sexual harassment: This is defined as embarrassing colleagues by means of constant and embarrassing insinuations with the goal of obtaining advantages or sexual favors. These actions may be clear or subtle, explicit or insinuated, written or using gestures, and may come in the form of coercion or blackmail. Encouraging a posture based on respect and teamwork between professionals is one way to ensure a healthy workplace. All types of harassment must be reported.



Policies and Procedures

We have adopted this code and policies and procedures to preserve our culture and ensure compliance with the legal, regulatory and fiduciary requirements applicable to our activities. We expect and require everyone to comply with this Code (and related policies and procedures). This Code refers to the following corporate policies and programs:

- Information Security Policy
- IT Services Policy
- Environmental Policy
- Anti-Bribery and Anti-Corruption Policy
- Donation Policy
- Dress Code Policy
- Travel Policy
- Ascenty Brand Usage Policy
- Data Privacy Policy
- Energy Management Policy
- Occupational Health and Safety Policy
- Compliance Policy
- Business Continuity Policy
- Conflict of Interests Policy



Conflict of interest and personal behavior

Personal behavior, both on and off the job, should reinforce a positive public image, both of the employee and of the company and its business activities. It is essential to use common sense in all personal and business relationships. Employees must avoid participating in any activities that could damage their reputation or Ascenty's reputation, compromising the relationship of trust between them and the company or between the company and its customers. Employees who exhibit inappropriate behavior are subject to the appropriate disciplinary measures, including dismissal for cause. It is important to remember your duties to Ascenty when engaging in personal activities away from the company, and to obtain permission before engaging in business activities beyond the scope of your role with the company.

The company encourages employees to be active members of their community. When engaging in personal, political, or similar activities, whether for-profit or not-for-profit, you must be aware that participation in any outside interest must not prevent you from properly performing your duties in the company and must not conflict with or run counter to the company's interests. In addition, you must ensure that when you are involved in these activities you are not allowed to speak or act on behalf of the company, regardless of cause or position.

A conflict of interest situation, for this purpose, occurs when a person's private interest interferes, or even appears to interfere, with the interests of the company. If there is any activity that prevents you from properly performing your duties to the company, or that could create a situation that would affect your ability to act objectively, effectively and in Ascenty's best interests, it could characterize a conflict of interest situation.

Therefore, it is essential to put the company's interest in any business above one's own, remembering that the company's interest includes its obligations to its customers. A "close personal relationship" with another Ascenty employee, supplier or customer may also constitute a conflict of interest or potential conflict of interest situation. To ensure that such relationships are handled properly and potential conflicts of interest are handled appropriately and responsibly, it is important to report any such relationships to the Ascenty Human Resources and/or Compliance Department.

Health and Safety Policy

With a focus on the well-being of everyone involved in the operation, Ascenty is committed to ensuring occupational health and safety, in accordance with local laws and regulations. Together with its employees, the company works to reduce or eliminate dangerous and high-risk work, taking the necessary actions in the workplace in line with the following objectives:

- *Providing a safe and healthy work environment for employees;*
- *Identifying and managing risks and opportunities associated to activities, processes, facilities, products or services;*
- *Adopting a preventive approach to manage Health & Safety risks of people and the integrity of facilities;*
- *Meeting legal requirements and other rules for Occupational Health and Safety at Work;*
- *Establishing, implementing, maintaining and continuously improving Health and Safety performance, focusing on the use of innovative solutions and people development;*
- *Supplying resources and adequate structure to fulfill all of these objectives.*
- *Supporting workers and safety committees to consult and collaborate on work-related matters;*
- *Recording and investigating incidents (accidents or near-misses) and non-conformities occurring at any of the company's sites with any of its employees, customers and contractors, and publishing the results.*



Reporting potential violations of code and policies

You must make reports in good faith. Reporting the facts internally is fundamental to the company's success, and the company expects and appreciates this behavior. You are required to be proactive and promptly report any violation or suspected violation of this Code or established policies or any illegal or unethical behavior or misconduct that you become aware of or are involved in.

When reporting a violation, you should include specific details and supporting documentation, where possible, to allow for proper investigation of the reported incident. Vague, non-specific, or unsupported allegations are more difficult to deal with. You have an obligation to report actual or potential misconduct or violations promptly to your immediate superior, as he or she is usually in the best position to resolve the issue. Alternatively, you may contact the Compliance Department (through the channels provided) or you may also report the matter to Ascenty's Audit and Compliance Committee (CAC) to report potential or actual misconduct or a violation of this Code and/or internal policies.

The confidentiality of reports and complaints will be maintained to the maximum extent possible, but in a manner compatible with the needs of conducting a proper investigation and in accordance with the law. You may want to identify yourself to facilitate our investigation.

If you feel that you have been treated unfairly or are facing reprisals or retaliation after your report, you should file your report directly with your immediate superior, the Compliance Department, the Human Resources Department or the Audit and Compliance Committee, or through the Confidential Channel itself.



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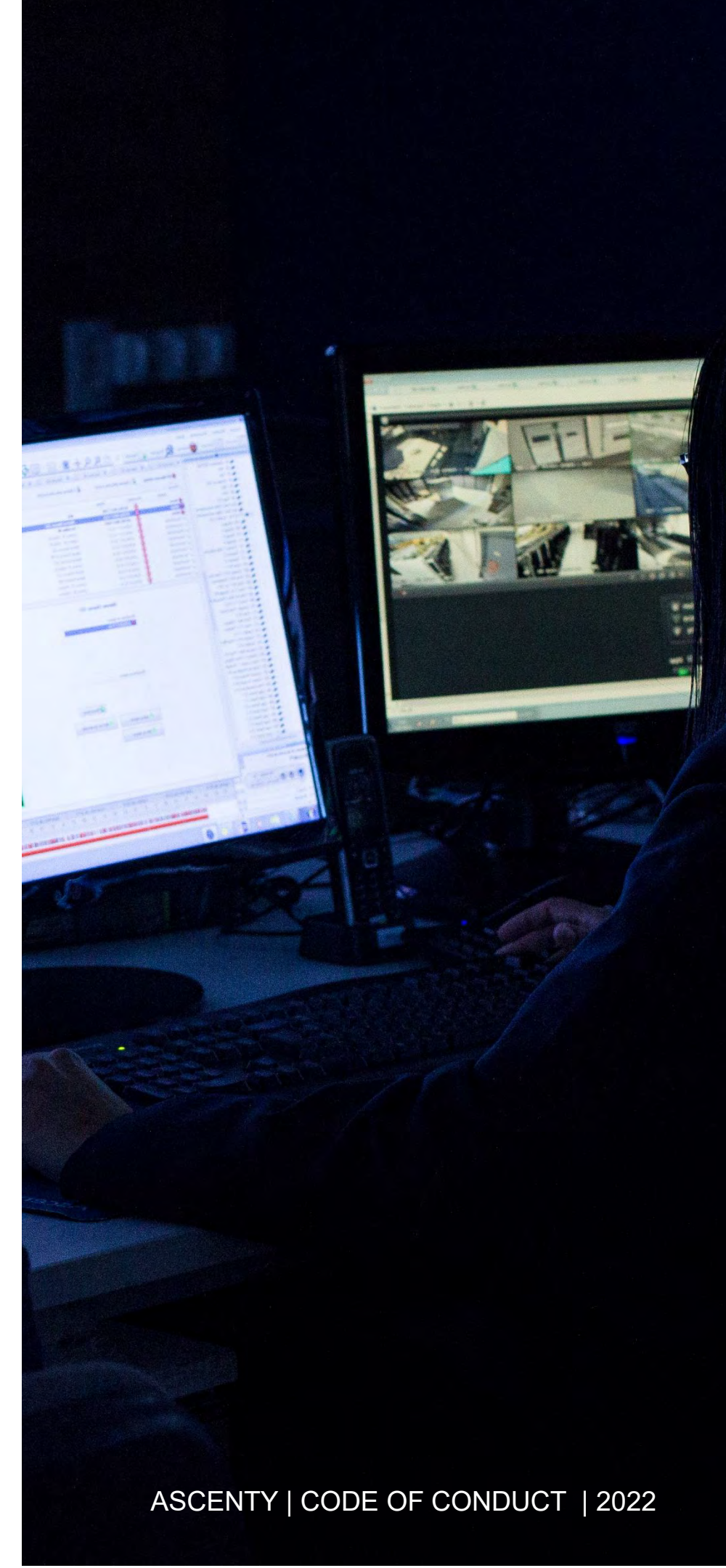
Legal and disciplinary measures for violations of this code

We reserve the right to take appropriate legal and disciplinary action for violations of this Code. This may result in immediate dismissal for cause and, as the case may be, legal action may be taken against you.

As for suppliers and customers, we also reserve the right to immediate contract termination, and legal action may be taken.



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Environment

Ascenty cares about the environment and takes measures to maintain or minimize any kind of impact on nature.

Always put your trash in a proper container, and recycle paper, plastic, glass, and metal. At Ascenty, hazardous waste is handled in a way that does not pollute or damage the environment, and is disposed of by specialized companies. Therefore, always check whether waste is being disposed of correctly. If you see a water or sewage leak, call the site manager immediately so that actions can be taken immediately.

All equipment that can pollute the air, water, or soil must be inspected periodically and must always be adjusted as indicated by the manufacturers. Any activity that may impact the environment must be studied before being carried out so that actions can be taken to eliminate or minimize this impact.

If you identify an action taken by an employee, third party, or customer that may be impacting the environment, you must immediately notify your manager and file an environmental incident report so that the event can be analyzed and appropriate action can be taken.





Environmental Policy

Ascenty is committed to the global environment and encourages its employees to carry out their activities sustainably, respecting:

- Public environmental policies;
- Natural resources, by recycling and efficient use;
- Efforts to reduce generated waste and prevent environmental damage resulting from the company's activities;
- The use of environmentally sound procedures and technologies to manage products and services, aiming to continuously improve environmental performance.

Information Security

We must take care of information both internal and external, always respecting the pillars of confidentiality, availability, and integrity (CAI). We must not disclose information without authorization, and we must always respect the information's confidentiality level. When we receive privileged information, we must keep the information's confidentiality level. Avoid talking about Ascenty business in the halls or in public places. Always keep your workplace clean and free of exposed confidential documents. These documents must always be kept in safe places where only you have access to them. Your work equipment, such as your cell phone, computer, and any external media (disk, pen drive, etc.), should always be password-protected and/or encrypted. Never leave equipment in public without your presence.

If you see an unidentified individual (i.e., not wearing a badge) on Ascenty's premises, find out who their contact is at Ascenty and take the person to them, so that the person can be identified and have access only to permitted locations.

If you identify a security breach, contact the responsible person and have them file an information security incident. This will allow the breach to be analyzed and action to be taken to prevent the problem from recurring.

We have taken strict measures to comply with the data privacy law for our employees, customers and suppliers, so we ask you to have the appropriate knowledge of how you should handle information, and if you have any questions, please contact the Ascenty Information Security team.



Information Security Policy

Caring for our customers' assets while ensuring that the information contained within our data center remains available, with integrity and confidentiality:

- We maintain an active and effective physical and logical security force.
- We train and educate our employees about the importance of information.
- We protect our assets ethically and in keeping with the best practices in the market.

Data Privacy Policy

As a data center and telecommunications infrastructure provider, Ascenty adopts physical protection measures for the equipment installed on its premises, ensuring physical access only to the right personnel who manage Ascenty's private data and providing the appropriate logical security to ensure that only data accessing the Data Center is secure in accordance with federal laws and IT best practices. This policy also aims at privacy and transparency in how Acenty handles the personal data of its customers and employees.



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The following channels are available to report any violation:

By email to compliance@ascenty.com

External phone Brazil 55 19 3517 7665

External phone Chile 56 (2) 2760-4600

External phone Mexico +52 (55) 9252-3102

Internal phone extension: 7665

Ascenty Intranet – via form

Online at: www.ascenty.com/contato (form)