

Digital Realty Tax Strategy Statement

Digital Realty Tax Strategy

Digital Realty is a global data centre services provider. We provide data centre, colocation and interconnection solutions for customers across a variety of industry verticals, ranging from financial services, cloud and information technology services, to manufacturing, energy, healthcare and consumer products. As of October 2017, our global portfolio consisted of 182 operating properties throughout the United States, Europe, Asia, Australia and Canada. Digital Realty employs more than 1,300 people worldwide.

Digital Realty's common stock is listed on the New York Stock Exchange.

Governance Framework and Attitude to Tax Planning

Digital Realty is committed to effective tax risk management and we organise our tax policies in a consistent manner globally. The tax function builds relationships across the organisation at all levels of seniority to communicate our strategy, promote good governance around tax decisions and mitigate tax risk. Through these relationships, we educate our internal stakeholders and convey our core values including honesty and integrity, which are key to our decision making. The tax function drives regular interaction with the Executive Management team which contributes to the cascading of the tax fundamentals through all levels of the business and promotes the profile and importance of consultation with the tax function. These relationships provide the basis for a broad understanding by the organisation's leaders of our tax risks.

In addition to our internal networks, Digital Realty recognises that using external tax advisors adds value, particularly when providing advice regarding new legislation and case law. External advisors are also used in a supportive capacity to provide additional guidance around particular risk areas where further certainty and expertise is beneficial. All external advice provided is reviewed by the tax function to ensure any resultant action is in line with our tax strategy, thereby assisting Digital Realty in taking a prudent approach to tax risk.

Digital Realty aims to deliver long-term value to its shareholders and accordingly seeks to be efficient in its tax affairs. Digital Realty does not enter into aggressive tax planning or tax strategies that lack economic substance or which are based on unreasonable assumptions. Digital Realty does not structure transactions to produce a tax result which is inconsistent with the underlying economic consequences. Digital Realty is committed to ensuring the integrity of all reported tax numbers and ensuring any resulting tax liability is paid in a timely manner, in the correct jurisdiction. A link to our governance guidelines and documents can be found [here](#).

Approach to Dealing with Tax Authorities

Digital Realty seeks to maintain open and constructive relationships with applicable tax authorities. Digital Realty tax personnel display respect, integrity and professional cooperation in our dealings with tax authorities worldwide.

About This Tax Strategy Statement

This tax strategy statement applies from the date of publication and will be reviewed annually. The strategy covers our approach to all taxes, including, but not limited to, income taxes, corporate taxes, payroll taxes, sales taxes (including value added tax), insurance premium taxes and transfer / stamp taxes.

Digital Realty regards this document as complying with its obligations under Paragraph 16(2), Schedule 19, Finance Act 2016 to publish a group tax strategy.