

QTS REALTY TRUST, INC.

Policy on Personal Loans to Directors and Executive Officers

A. Background/Purpose

Pursuant to Section 402 of the Sarbanes-Oxley Act of 2002, companies with securities registered in the United States, or that are required to file reports with the U.S. Securities and Exchange Commission are prohibited from extending, arranging or renewing personal loans to or for their directors and executive officers. QTS Realty Trust, Inc. (the “**Company**”) has adopted this Policy on Personal Loans to Directors and Executive Officers (this “**Policy**”) to help ensure the Company’s compliance with Section 402 of Sarbanes-Oxley.

B. Policy

It is the policy of the Company that neither the Company nor any company affiliated with the Company shall be permitted, directly or indirectly, to extend or maintain credit, arrange for the extension of credit, or renew an extension of credit in the form of a personal loan to or for any Director or Executive Officer of the Company or to any immediate family members of such individuals. For purposes of this Policy, the term “**Director**” shall include any member of the Company’s Board of Directors, and the term “**Executive Officer**” shall have the meaning set forth in Section 3b-7 of the Securities Exchange Act of 1934, which includes:

- The Company’s President, Chief Executive Officer, Chief Financial Officer, Chief Operating Officer – Operations, Chief Operating Officer – Sales & Marketing, Chief Investment Officer and General Counsel;
- Any vice president of the Company in charge of a principal business unit, division or function (such as sales, administration or finance);
- Any other officer of the Company who performs a policy making function for the Company;
- Any other person who performs similar policy making functions for the Company; and
- Executive officers of any subsidiaries of the Company, if they perform policy making functions for the Company.