

**Report of Organizational Actions  
Affecting Basis of Securities**

OMB No. 1545-0123

► See separate instructions.

**Part I Reporting Issuer**

<b>1</b> Issuer's name		<b>2</b> Issuer's employer identification number (EIN)	
DIGITAL REALTY TRUST, INC.		26-0081711	
<b>3</b> Name of contact for additional information	<b>4</b> Telephone No. of contact	<b>5</b> Email address of contact	
INVESTOR RELATIONS	415-738-6500	investorrelations@digitalrealty.com	
<b>6</b> Number and street (or P.O. box if mail is not delivered to street address) of contact		<b>7</b> City, town, or post office, state, and ZIP code of contact	
FOUR EMBARCADERO CENTER, SUITE 3200		SAN FRANCISCO, CA 94111	
<b>8</b> Date of action		<b>9</b> Classification and description	
12/31/2018		COMMON SHARES	
<b>10</b> CUSIP number	<b>11</b> Serial number(s)	<b>12</b> Ticker symbol	<b>13</b> Account number(s)
253868103		DLR	

**Part II Organizational Action** Attach additional statements if needed. See back of form for additional questions.

**14** Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ►

Cash distributions were paid in 2018 as described below. A portion of each of the cash distributions paid was a non-dividend distribution.

\$0.930000 per share was paid on 01/12/2018 to common shareholders of record as of 12/15/2017.

\$1.010000 per share was paid on 03/30/2018 to common shareholders of record as of 03/15/2018.

\$1.010000 per share was paid on 06/29/2018 to common shareholders of record as of 06/15/2018.

\$1.010000 per share was paid on 09/28/2018 to common shareholders of record as of 09/14/2018.

**15** Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ►

The common shareholders should reduce the basis in the common shares as a result of the non-dividend distribution. The amount of the non-dividend distribution were as follows:

\$0.184357 per share for the distribution on 01/12/2018

\$0.200216 per share for the distribution on 03/30/2018

\$0.200216 per share for the distribution on 06/29/2018

\$0.200216 per share for the distribution on 09/28/2018

**16** Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ►

The non-dividend distribution was calculated as the amount of cash distribution in excess of Digital Realty Trust, Inc's earnings & profits.

**Part II** Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ► \_\_\_\_\_

IRC Section 301(c)(2) provides that the portion of a distribution which is not a dividend (as defined in IRC Section 316) shall be applied against and reduce the adjusted basis of the stock.

18 Can any resulting loss be recognized? ► \_\_\_\_\_

No loss will be recognized on the distributions made during the 2018 tax year.

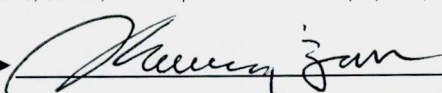
19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ► \_\_\_\_\_

The reportable tax year is 2018.

**Sign Here**

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Signature ►



Date ►

1/25/2019

Print your name ► **Jennifer Xiao**

Title ► **SVP, Tax**

**Paid Preparer Use Only**

Print/Type preparer's name

Preparer's signature

Date

Check ☐ if self-employed

PTIN

Firm's name ►

Firm's EIN ►

Firm's address ►

Phone no.