

Modern Slavery and Human Trafficking Statement for the Fiscal Year Ended December 31, 2023

Introduction

Equinix's ethics and values are core to our people and culture and how we conduct our business around the world. Equinix is opposed to modern slavery and human trafficking in all forms, and we expect the same opposition from all who work for us and with whom we have business dealings.

This Statement describes how Equinix, Inc. and its subsidiaries (hereinafter collectively referred to as "Equinix") met our commitment during Fiscal Year 2023 to prevent modern slavery and human trafficking in our operations and our supply chains pursuant to the [UK \(United Kingdom\) Modern Slavery Act](#), the [Australian Modern Slavery Act](#), and [Canadian Forced and Child Labour in Supply Chains Act](#). Unless otherwise noted in this Statement, the policies and practices described herein apply to Equinix, Inc. and all of its subsidiaries.

In addition to Equinix, Inc., the United Kingdom (UK) subsidiaries that qualify as reporting entities under the UK (United Kingdom) Modern Slavery Act include:

- Equinix (UK) Limited
- Equinix (UK) Enterprises Ltd
- Equinix (Services) Limited

In addition to Equinix, Inc., the Australian subsidiaries that qualify as reporting entities under the Australian Modern Slavery Act include:

- Equinix Australia Pty Ltd
- Entities from the Metronode Group (acquired in 2018)

In addition to Equinix, Inc., the Canadian subsidiaries that qualify as reporting entities under the Canadian Forced and Child Labour in Supply Chain Act include:

- Equinix Canada Ltd
- Equinix (Canada) Enterprises Ltd
- Equinix (Canada) Services Limited

1. Equinix structure and business operations

Equinix is the world's digital infrastructure company, enabling digital leaders to harness our trusted platform to bring together and interconnect the foundational infrastructure that powers their success – sustainably and securely. Equinix enables today's businesses to access all the right places, partners and possibilities they need to accelerate advantage. With Equinix, they can scale with agility, speed the launch of digital services, deliver world-class experiences and multiply their value.

Our International Business Exchange™ (IBX®) data centers are present across the globe. A full list of our IBX locations is available [here](#).

- In Australia, we have 18 IBX data centers located throughout Sydney, Melbourne, Perth, Canberra, Adelaide and Brisbane.
- In the UK, we have 14 IBX data centers located throughout London and Manchester.
- In Canada, we have 16 IBX data centers located throughout Calgary, Kamloops, Montreal, Ottawa, Saint John, Toronto, Vancouver, Winnipeg.

Equinix had 14,213 regular employees as of 31 December 2023.

2. Our supply chains

Our supply chains contain a mixture of global and local suppliers. These include large global equipment



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manufacturers that supply and maintain parts of our high availability data centers; global IT suppliers and service providers that support our business systems and processes; and locally based suppliers such as engineering firms, consultancy firms, and materials and utilities suppliers needed to provide the space and power and cooling infrastructure for our customers.

- The space consists of the materials used to build our data centers and the contractors we hire during the construction phases. Additionally, where we lease premises or purchase existing premises, we may engage entities which specialize in construction to 'fit-out' the premises.
- The power and cooling infrastructure consist of equipment that brings power to our customers' electronic equipment (including backup generators and uninterruptible power supply units) and HVAC equipment to maintain the necessary temperatures, airflow and humidity needed to keep our customers' equipment running effectively and reliably. Our power supply chain is heavily monitored and managed for both price and environmental concerns.
- We use a variety of suppliers to help us maintain aspects of data center operations such as physical security measures and security personnel, janitors, waste management companies, etc.
- We also use consultants and vendors to help us improve our business strategy and processes. These suppliers are engaged to help support our business across a number of different functional areas, for example, Operations, IT, Sales & Marketing, Finance, and Human Resources.

3. Our policies and training

As our baseline, Equinix's ethics and values are embodied in our [Code of Business Conduct](#). We have processes in place to ensure that all employees certify compliance with our Code of Business Conduct, and we require all employees to complete annual compliance training to maintain awareness. Our trainings cover various topics in our Code, including human rights and anti-bribery and corruption, and our trainings are provided live and online in multiple languages. Equinix's Code also establishes the company's whistleblower protection practices, including our zero tolerance, non-retaliation policy that protects individuals who report a concern. Equinix's Code is posted on the company website and is publicly accessible including to those acting on our behalf, such as agents, representatives and partners.

Consistent with our Code, we expect our suppliers and partners to support and respect the protection of human rights around the world. We are committed to upholding the fundamental human rights of our employees and of the workers of companies we engage. We outline our standards for suppliers and partners in our Equinix [Business Partner Code of Conduct](#).

Since June 2015, our Global Purchasing Policy requires that: a) suppliers receive an electronic copy of the Business Partner Code of Conduct; b) our supplier contracts contain an obligation upon the supplier to comply with the Business Partner Code of Conduct; and c) suppliers comply with all applicable wage and hour, anti-slavery and human trafficking laws, statutes, regulations and codes and will not engage in any activity, practice or conduct related to human trafficking or use child or forced labor in providing the deliverables under the contracts, including our right to request evidence of compliance with such requirements at any time upon reasonable notice.

4. Modern slavery risk areas

We recognize that the level of risk of modern slavery is influenced by a range of factors, including sector and industry-specific risks, products and services risks, geographic risks and entity-specific risks. We recognize that some industries which involve the increased use of unskilled, temporary and outsourced labor have a higher risk of modern slavery. Similarly, we know that there are greater risks of modern slavery when sourcing materials from regions which are more exposed to factors such as poor governance, weak rule of law or conflict.

We remain vigilant in taking steps to minimize these risks by requiring our suppliers to confirm compliance with our ethical standards during our due diligence process, and we are taking steps to enhance our global Supplier Risk Management program to assess and monitor our suppliers using a risk-based approach.

5. Our risk assessment and due diligence processes

Our Supply Chain Environmental Social and Governance (ESG) function within Global Procurement is responsible for carrying out an overall supply-side risk assessment, which includes identifying potential risks of modern slavery across all of our suppliers with special attention to people-intensive industries (such as construction, janitorial,



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hospitality, etc.). This function is also responsible for ensuring that Equinix's operations and purchasing activities are in line with our policies and standards, including proper due diligence and appropriate supplier selection criteria.

In 2019, Equinix rolled out a global supplier source-to-pay platform to identify and manage supplier risks, assign roles and responsibilities for supplier due diligence and monitoring, and document our supplier assessments. Throughout 2023, we continued to make investments in digital tools and automation to support our supplier risk management processes.

In 2023, Equinix also conducted its first triennial supply chain-facing Human Rights Impact Assessment (HRIA). The assessment aims to identify and understand inherent human rights risks by market and category, assess the current effectiveness of our policy and controls, and identify specific areas to further reduce residual risk across our supply chain. Key findings of our report are available [here](#).

In 2024, we continue to enhance our supplier due diligence processes and focus our efforts on high-risk categories and geographies, as informed by the outcome of our risk assessments.

Additionally, our supplier contracts stipulate that Equinix does not engage with suppliers who engage in any practices related to human trafficking and that Equinix maintains its right to terminate or not renew its contract with any supplier that engages in these practices.

6. Our consultation processes

Equinix has a global Approval Authority Policy which aligns across regions based on functions. All Equinix entities adhere to this policy when engaging in consultation processes. Functional teams within Equinix are responsible for designing policies, procedures and training programs relevant to the function's areas of expertise to help all employees know about and act within all relevant laws and Equinix policies. Our Supply Chain ESG function creates, maintains and oversees the relevant policies, procedures, assessments, training and tools specific to human rights in the supply chain and surrounding our procurement activities and interactions with suppliers. Together with Global Legal, Ethics & Compliance and Human Resources teams, they coordinate communications to employees regarding the importance of compliance with these policies and procedures. Through these means of communication, there is ongoing dialogue within Equinix to ensure that modern slavery risks have been appropriately identified and are being addressed, and that our Equinix entities are aware of what actions they need to take.

7. Our remediation processes

Equinix is committed to continuous improvement, including through its procurement policies, processes and practices, in order to play its part towards the goal of eradicating any form of modern slavery and human trafficking in global supply chains around the world. We have established processes for reporting and addressing any risks or complaints of violations of our Code, including violations relating to modern slavery, should they come to our attention. In particular, we:

- Maintain a whistleblower protection policy, which emphasizes zero tolerance for any discrimination or retaliation against whistleblowers; and
- Maintain an ethics and compliance helpline which is accessible by employees through our internal website, online and by third parties. The helpline is managed and hosted by an independent provider for independent online and telephone helpline services. The online reporting function is available in 22 languages, 24 hours a day, 7 days a week, 365 days a year.

All reports of potential violations of our policies are promptly and adequately addressed by members of our HR and/or Legal departments. If we determine that a complaint or report is substantiated, we will take appropriate action to address the circumstances of the complaint.

For the 2023 reporting period, we did not identify any instances of forced labor or child labor in our supply chains and, therefore, no remedial measures were taken, including those related to remediating the economic impact on the most vulnerable families.

8. How we assess the effectiveness of our actions

Equinix takes various measures to monitor and assess the effectiveness of its actions to address modern slavery



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risks, including tracking the number and completion rates of internal compliance trainings that we have rolled out to employees, tracking the proportion and number of complaints resolved by our confidential ethics helpline, and benchmarking our internal management systems against the requirements of applicable modern slavery legislation and best practices.

We also evaluate the inherent and residual risks in our supply chain as an indicator of the effectiveness of our controls, and we audit our due diligence procedures, preventive controls, and risk identification procedures with an eye towards continuous improvement.

Equinix seeks to effectively avoid monetary and reputational risks associated with modern slavery and human trafficking. As an indicator of our compliance controls and operations, in 2023 Equinix received no significant or material fines or non-monetary sanctions for non-compliance with laws and regulations.

9. Our shared commitment

As a global interconnection and data center company, Equinix is dedicated to powering, protecting and connecting the organizations and ecosystems that will shape this new era, and doing so in a sustainable, responsible and respectful way. We are driven by a shared commitment to deliver strong operating performance while never losing sight of our “In Service To” mindset which holds us in service to each other, to our customers, to our suppliers and business partners, to our shareholders and to the communities in which we operate.

For comprehensive information on all our sustainability efforts please visit our sustainability website:
<https://sustainability.equinix.com/>

Approvals

Canada

This statement was approved by the board of directors for Equinix Canada in compliance with the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act.

In accordance with the requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities below. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purpose of the Act, for the reporting year 2023.

- Equinix Canada Ltd
- Equinix (Canada) Enterprise Ltd
- Equinix (Canada) Services Limited

Andrew Eppich

Andrew Eppich, Managing Director

Date: May 29th, 2024.