



Modern Slavery and Human Trafficking Statement for the Fiscal Year Ended December 31, 2024

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 2024 to assess and address the risk of 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 the [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.

The board of directors of each reporting entity listed in **Appendix A** ("In-Scope Entities") has considered and approved this statement prior to publication.

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 Adelaide, Brisbane, Canberra, Melbourne, Perth and Sydney.
- In Canada, we have 15 IBX data centers located throughout Calgary, Kamloops, Montreal, Ottawa, Saint John, Toronto, Vancouver, and Winnipeg.
- In the UK, we have 14 IBX data centers located throughout London and Manchester.

Equinix had 13,606 regular employees as of 31 December 2024.

2. Our supply chains

Equinix's supply chains are diverse and encompass a mix of global and local suppliers, each playing a crucial role in the operation and maintenance of our high-performance data centers.

- Global Equipment Manufacturers: We partner with global manufacturers who supply and maintain essential components for our data centers.
- Global IT and Service Providers: Our global IT and service suppliers support our business systems and processes, ensuring our operations run smoothly.
- Local Suppliers: We engage locally based suppliers, including engineering and consultancy firms, as well as suppliers of materials and utilities needed to provide the space, and power and cooling infrastructure for our customers.

In particular, our supply chains include:

- Construction Contractors: Our supply chain includes contractors responsible for the construction of our data centers. Where we lease premises or purchase existing premises, we may engage entities which specialize in construction to 'fit-out' the premises.



EQUINIX

- **Power and Cooling Infrastructure Suppliers:** We rely on suppliers of power and cooling infrastructure, including backup generators and uninterruptible power supply units. Additionally, HVAC equipment is sourced to maintain the temperatures, airflow and humidity levels 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.
- **Operational Support Suppliers:** We use a variety of suppliers to help us maintain aspects of our data center operations such as physical security measures and security personnel, janitors, waste management companies, etc.
- **Consultants:** We engage consultants to enhance our business strategies and processes across various functional areas, including Operations, IT, Sales & Marketing, Finance, Legal and Human Resources.

3. Our policies and training

As our baseline, Equinix's ethics and values are embodied in our [Code of Business Conduct](#) (Code). 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 of the requirements of the Code. 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 (GPP) sets sourcing standards for employees, including compliance and sustainability considerations, and provides guidelines for business process owners responsible for purchasing decisions. The GPP requires that:

- Suppliers receive an electronic copy of the Business Partner Code of Conduct;
- Our supplier contracts contain an obligation upon the supplier to comply with the Business Partner Code of Conduct; and
- 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.

We regularly update the GPP to reflect evolving standards.

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. For Equinix, some industries which involve the increased use of unskilled, temporary and outsourced labor have a higher risk of modern slavery (such as construction, janitorial, hospitality, etc.). 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 overall supply-side risk assessment across the organization, which includes identifying potential risks of modern slavery across all of our suppliers with special attention to people-intensive industries. Tier one suppliers are continuously monitored across a range of ESG criteria and the Supply Chain ESG function assesses their



EQUINIX

performance at least annually. 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 2021, Equinix rolled out Third Party Risk Management (TPRM) to identify assess and monitor suppliers across multiple risk domains. Internal risk domain teams are responsible for managing identified risks to completion. Each year, we make investments in additional capabilities 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.

Each year, 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 and the changing risk landscape impacting suppliers.

We require suppliers to comply with all applicable wage and hour, anti-slavery and human trafficking laws, statutes, regulations and codes and to 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. Equinix maintains the 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 (AAP) which aligns across regions based on functions. The AAP sets minimum requirements for the approval of significant transactions, detailing the necessary approval levels, evidence of approval, delegation of authority and transaction commitment types. All Equinix entities must adhere to this policy. 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 the 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.

In order to prepare this joint statement, we engaged with the Supply Chain ESG, Legal and Ethics & Compliance teams, as well as each of the reporting entities covered by this statement.

7. Our remediation processes

Equinix is committed to continuous improvement, including through its procurement policies, processes and practices, 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 Human Resources 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 2024 reporting period, we did not identify any instances of forced labor or child labor in our supply chains and,



EQUINIX

therefore, no remedial measures were taken, including any 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 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 and compliance 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 any risks associated with modern slavery and human trafficking. As an indicator of our compliance controls and operations, in 2024, 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, we build our business on a foundation of ethical conduct for accessible, resilient and responsibly managed digital infrastructure. We focus on responsible business practices, strong corporate governance and global compliance. 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/>.



Appendix A – In-Scope Entities

Equinix has chosen to make a joint Modern Slavery and Human Trafficking Statement at the group level. The specific Equinix entities in scope of reporting that have approved the statement for the fiscal year end 31 December 2024 are:

Australia

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

- Equinix Australia Pty Ltd
- Equinix Australia National Pty Ltd
- Equinix (Australia) Enterprises Pty Limited

Canada

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

United Kingdom

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) Ltd
- Equinix (UK) Enterprises Ltd

United States

- Equinix, Inc.



Appendix B – Signature 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 2024.

- Equinix Canada Ltd
- Equinix (Canada) Enterprises Ltd

Signed by:

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Marc Mondesir, Managing Director

I have the authority to bind the above listed entities.

Date: 30 May 2025