



EQUINIX

Positioning Statement

MODERN SLAVERY ACT 2015 (UK) POSITIONING STATEMENT

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

Our ethics and values are clearly embodied in our Code of Business Conduct, and we have processes in place to ensure that all of our employees agree to comply with our Code of Business Conduct, and all employees undergo on-going training and are asked to certify such compliance.

These same ethics and values are impugned to our suppliers and vendors through a series of measures, including our Business Partner Code of Conduct.

Our supply chain in the United Kingdom is a mixture of global and local vendors. These include large global equipment manufacturers that supply and maintain infrastructure that forms part of our high availability data centres, global IT suppliers and service providers that support our business systems, processes and procedures and then more locally based suppliers such as engineering firms, consultancy firms, and other types of service providers. These suppliers are engaged to help support our UK business across a number of different functional areas, e.g. Operations, IT, Sales & Marketing, Finance, Human Resources, etc.

With regard to the major suppliers and vendors, global and local, to our UK business, we have employees focused on procurement activities to ensure that we carry out proper due diligence and implement appropriate vendor selection criteria that include due regard to the ethical standards and corporate values which are consistent with the principles embodied in the Modern Slavery Act 2015. We have implemented contractual provisions into our standard terms and conditions of purchase and supplemental contracts for the supply of goods and services that require such suppliers and vendors to comply with the requirements of the Modern Slavery Act 2015, including our right to request evidence of compliance with such requirements at any time upon reasonable notice. In 2019, we continued to consider the risk of modern slavery and human trafficking in our and supply chains.

We continue to take a risk-based approach to monitoring our suppliers and vendors and the way we assess these suppliers and vendors in relation to compliance with our Business Partner Code of Conduct. In 2019, Equinix rolled out a global supplier sourcing platform with the aim of driving compliance with the requirements of the Modern Slavery Act 2015 at the point of onboarding and at annual vendor reviews. Having rolled out this global supplier sourcing platform, we are now working toward automation of the supplier onboarding and compliance checking process, with the aim of having this in place before the end of 2020.

Equinix is committed to continuing to improve 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.

Russell Poole

Russell Poole (Apr 30, 2020)

Russell Poole
Director
Equinix (UK) Limited
Equinix (UK) Enterprises Ltd

Michael Winterson (May 4, 2020)

Michael Winterson
Director
Equinix (Services) Limited

This statement has been approved by the Boards of Equinix (UK) Limited, Equinix (Services) Limited and Equinix (UK) Enterprises Ltd, in compliance with the UK Modern Slavery Act.