



# Partner Code of Conduct

## Introduction

Equinix is the world's digital infrastructure company, built on a foundation of strong corporate values and a commitment to doing business with honesty, integrity and professionalism to achieve superior results. We rely on our employees as well as our Business Partners to maintain our high ethical standards.

The Equinix Business Partner Code of Conduct ("PCoC") applies to all Business Partners, including but not limited to our suppliers, resellers, consulting partners and service providers. It states our expectations of our Business Partners and their employees, agents and subcontractors when conducting business with or on behalf of Equinix.

Business Partners should require their next-tier suppliers to acknowledge and implement the PCoC in their operations and across their supply chains. Business Partners should promptly inform their Equinix contact, a member of Equinix management, or the contacts provided at the end of this document when any situation develops that causes the Business Partner to operate in violation of this PCoC.

Equinix values Business Partners who join Equinix in supporting these common goals of integrity and ethical business practices.

## The Workplace

### Non-Discrimination or Harassment

Equinix does not tolerate, and Business Partners shall not engage in, any form of discrimination, harassment or demeaning behavior against any individual or group on the basis of race, color, religion, sex, sexual orientation, gender identification, national origin or ancestry, citizenship, age, marital or family status, military or veteran status, physical or mental illness or disability, pregnancy or any other basis prohibited by applicable law.

### Safe Conditions

Business Partners should provide a safe, productive and secure work environment for their employees and provide safety training when appropriate.

## Doing Business with Equinix

### Conflicts of Interest

Business Partners shall avoid situations that create, or even appear to create, a conflict of interest with Equinix. For example, having a material financial interest in Equinix may create a conflict of interest. In deciding whether a financial interest in Equinix is a conflict of interest, the Business Partner shall consider the size and nature of the investment, the Business Partner's ability to influence decisions of Equinix, the Business Partner's access to confidential information about Equinix, and the nature of the relationship. This would include a spouse, relative or close friend of an Equinix employee who can use his/her position or influence the bidding process or other negotiations. The Business Partner should disclose that relationship to the Equinix Ethics and Compliance Office.

### Gifts, Meals and Entertainment

At Equinix, we believe the purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain an unfair advantage or attempt to influence business decisions. Business Partners should never offer or provide any gift or entertainment to an Equinix employee or family member of an Equinix employee unless it:

- is reasonable and not extravagant,
- is appropriate under the circumstances and serves a valid business purpose,
- is customary and appropriate under U.S. and local customs,
- is not being offered for any improper purpose and could not be construed as a bribe or payoff, and
- does not violate any U.S., local or international laws or regulations.

### Communications

Unless otherwise agreed to in writing by Equinix, Business Partners are prohibited from publishing any marketing materials, press releases or media interviews that include a reference to Equinix, our clients/customers or the work being completed together (a "Publication"). Any Publication by a



Business Partner should be pre-approved by the Equinix Marketing Department and will be considered on a case-by-case basis.

### **Product and Service Quality**

Any Business Partner who is supplying products and services to Equinix shall meet and comply with applicable regulatory quality and safety standards, in addition to Equinix's internal quality standards, policies, specifications, procedures and contract requirements. Business Partners also have a responsibility to procure goods and services for Equinix in a responsible manner. Business Partners shall:

- Follow established Equinix procurement rules and procedures, including not beginning any work for Equinix without an authorized purchase order and contract, where required
- Conduct appropriate due diligence before engaging third parties, such as employees, agents, consultants, suppliers, resellers, or distributors
- Not subcontract work for Equinix unless the Business Partner obtains prior written consent from Equinix

## **Equinix Property**

### **Confidential Information and Equinix Property**

Any confidential or proprietary information about Equinix that the Business Partners may become aware of, including anything the Business Partner knows or learns about Equinix, our customers, our suppliers and other third parties that is not available to the public, shall be kept strictly confidential. Business Partners' responsibility to protect Equinix's confidential and proprietary information continues even after the completion of their assignment or contract with Equinix. Business Partners shall notify an Equinix authorized representative of any unauthorized use of Equinix confidential information by a third party. Business Partners shall protect and conserve Equinix's valuable property and resources and use them only for legitimate business with Equinix.

### **Intellectual Property**

Business Partners may only use Equinix's intellectual property to the extent permitted under their contract with Equinix and must not infringe or misuse the intellectual property of Equinix or others. Intellectual property includes, among other things, Equinix copyrights, patents, trademarks, trade secrets and other intangible property. Business Partners should notify an Equinix authorized representative of any unauthorized use of Equinix intellectual property by a third party.

## **Laws and Regulations**

All Business Partners shall conduct their business activities in full compliance with all applicable laws and regulations while conducting business with and/or on behalf of Equinix.

### **Privacy**

Business Partners shall comply with all applicable data privacy laws.

### **Trade**

Business Partners shall comply with all applicable trade controls, as well as all applicable export, re-export and import laws and regulations in providing goods and/or services to Equinix.

### **Audit**

While Business Partners are expected to self-monitor and demonstrate their compliance with the PCoC, Equinix may audit Business Partners' or inspect Business Partners' facilities to confirm compliance. Business Partners that behave in a manner that is unlawful or inconsistent with the PCoC or any other Equinix policy risk termination of their business relationship with Equinix.

### **Anti-Bribery, Corruption, Anti-Money Laundering and Fair Dealing**

At Equinix, our business practices are based on honesty, integrity and compliance with the law. Equinix is committed to dealing fairly and honestly with all our Business Partners, regardless of where they are located or the type of products or services they provide. We engage in open and fair procurement practices where Business Partners are selected on a competitive basis and establish a mutually beneficial relationship based on close cooperation and open communications. Business Partners should never propose or enter into any agreement with a competitor to fix margins, prices or contractual terms, or to divide up the market in any way.

Business Partners should not offer, provide, authorize or receive bribes, kickbacks or other improper payments for any reason. Business Partners also should comply with all applicable anti-bribery and corruption laws, including but not limited to the U.S. Foreign Corrupt Practices Act (FCPA) and the U.K. Bribery Act.

Business Partners should prevent and monitor for possible money laundering, terrorist financing or activity violating any applicable sanctions or export-based restrictions. Business Partners should ensure they are conducting business only with reputable business partners, for legitimate business purposes, with funds derived from legitimate sources.



### **Insider Trading**

Business Partners should comply with securities laws and may never use any confidential, non-public information obtained during their relationship with Equinix for the personal benefit of the Business Partner, their employees or any other person.

### **Business Records**

Business Partners shall always honestly and accurately record and report all business information and comply with all applicable laws regarding their completion and accuracy. Business Partners shall create, retain and dispose of business records in full compliance with all applicable legal and regulatory requirements.

### **Work Hours and Age Laws**

Business Partners shall comply with all applicable laws on work hours and overtime, as well as all applicable laws on wages and benefits. Business Partners shall not hire workers who are younger than 15 years of age (or 14 years of age, where consistent with International Labour Organization guidelines, and the local law allows such exception), the age for completing compulsory education, or the minimum age established by law, whichever is greater. In addition, Business Partners shall observe all applicable legal requirements for work of employees under 18 years of age, particularly those pertaining to hours of work and working conditions.

## **Environment, Social and Governance**

### **Environment & Sustainability**

At Equinix we are committed to protecting our planet and the climate, and to reducing our consumption of all resources. We are on a journey to embed sustainability into our business to protect, connect and power a more sustainable digital world. We expect our Business Partners to, at a minimum, comply with all local, state and federal environmental regulations. Equinix encourages its Business Partners to develop environmental and energy management systems and take steps to measure, report and manage their environmental footprints including their greenhouse gas emissions, energy consumption, water use, air pollution and waste generation. Business Partners shall review Equinix's annual sustainability report (available at <https://www.equinix.com/company/sustainability/>) and set quantifiable goals to reduce their impacts. In the spirit of collaboration and promoting continuous improvement, Equinix may request participation on

an annual basis for Business Partners to disclose sustainability-related data. Equinix may at times offer sustainability education and capacity building opportunities for Business Partners.

### **Business Partners Diversity & Inclusion**

We are committed to creating an environment where our employees are free to bring their best selves to work and to pursue any opportunity before them. We want Equinix to be a place where every employee, every day, can truly say "I'm safe, I belong and I matter" and for our workforce, at all levels, to better reflect and represent the communities in which we operate. We acknowledge that we have work to do in achieving this vision, but are fully committed to demonstrating measurable, enduring progress. We encourage our Business Partners to put in place their own diversity and inclusion goals, comply with all local laws and regulations, and ensure that a broad range of perspectives are included. We encourage our Business Partners to engage with their communities and contribute to economic development and social impact causes. Equinix also encourages its Business Partners to partner with small and socio-economically diverse suppliers in its own procurement and subcontracting activities.

### **Community Involvement**

Equinix seeks to work with Business Partners who share our commitment to social and economic development and the sustainability of the communities we serve. Therefore, we encourage Business Partners to engage with their communities proactively and positively.

### **Human Rights & Freedom of Association**

We are opposed to all forms of discrimination with respect to employment and occupation, modern slavery, human trafficking, forced or compulsory labor, and child labor. In accordance with the United Nations Declaration on Human Rights and the International Labour Organization Declaration on Fundamental Principles and Rights at Work, we expect our Business Partners to share in our respect for human rights, employee health and safety, and a voluntary labor force. We expect our Business Partners to comply with all relevant human rights laws and regulations and respect their employees' right to associate or engage in collective bargaining and ensure workers have access to work-related documents. Business Partners are prohibited from withholding employee identity or immigration papers (including but not limited to passports, drivers' licenses or work permits), or destroying concealing, confiscating, or otherwise restricting or denying workers' access to



such documents. Workers shall be free to resign their employment in accordance with local and national laws or regulations without unlawful penalty.

### Health and Safety

Business Partners are expected to strive to achieve the highest levels of health and safety. As a part of this, Business Partners shall develop and implement health and safety management practices in all aspects of their business. Without limitation, Business Partners shall:

- Comply with all applicable occupational health and safety laws and regulations, including but not limited to laws and regulations that address occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food and housing;
- Establish and implement business continuity plans that address topics including but not limited to natural disasters, emergencies and other potential business interruptions; and
- Allow under any circumstance any physical abuse or discipline, or the threat of physical abuse, sexual abuse or other sexual harassment, verbal abuse, or other forms of intimidation.

### Protection of Identity and Non-Retaliation

Business Partners shall maintain programs that ensure the confidentiality, anonymity and protection of Business Partners and their employee whistleblowers, unless prohibited by law. Business Partners shall implement a communicated process for Business Partners' employees to be able to raise any concerns without fear of retaliation.

### Pre-Placement Background Screens

Business Partners shall comply with Equinix's Background Screening Policy, as may be amended, and perform background checks on all Business Partner's personnel as required by Equinix.

## Monitoring and Reporting Misconduct

### Subcontractor Monitoring

Business Partners shall engage in monitoring and verification of their subcontractors to assess, prevent, remediate and/or report any actual or potential non-compliance associated with all sections of this PCoC.

### Reporting

Business Partners are encouraged to report to Equinix any conduct, including conduct of any Equinix employee, that the Business Partners believe in good faith to be an actual, apparent or potential violation of this PCoC. Prompt reporting of misconduct is in the best interest of everyone and helps ensure our continued ethical business relationship. Equinix will maintain confidentiality to the extent possible and will not tolerate any retaliation taken against any individual who has, in good faith, reported questionable behavior or a possible violation of this PCoC.

Business Partners can contact Equinix with questions about PCoC or to report a potential violation.

[Equinix.Ethicspoint.com](https://Equinix.Ethicspoint.com)



## Power Your Digital Leadership at Equinix

On Platform Equinix®, digital leaders bring together all the right places, partners and possibilities to create the foundational infrastructure they need to succeed. On a single global platform, place infrastructure wherever you need it. Connect to everything you need to succeed. Seize opportunity with agility, speed and confidence.