

EQUINIX, INC.

POLICY ON RECOUPMENT OF INCENTIVE COMPENSATION

(Adopted and effective as of November 10, 2016)

The Compensation Committee (the “Committee”) of the Board of Directors of Equinix, Inc. (the “Company”) may, in its sole discretion and to the extent legally permitted, require the return, repayment or forfeiture of any cash or equity-based incentive compensation payment or award received by any current or former Executive Officer of the Company (where “received” and “Executive Officer” are as defined below) during the three completed fiscal years immediately preceding the date on which the Company is required to prepare a restatement of its financial statements due to material noncompliance of the Company with any financial reporting requirement under the securities laws (a “Restatement”), if:

- 1) the payment or award was made, granted, earned or vested based wholly or in part upon the attainment of a Company financial reporting measure (including, without limitation, (a) any measure that is determined and presented in accordance with the accounting principles used in preparing the Company’s financial statements, and/or (b) any measure that is derived wholly or in part from such measure (but, for the avoidance of doubt, not including Company stock price or Company total stockholder return);
- 2) the Committee determines that fraud or intentional misconduct resulted in the need for the Restatement (irrespective of any individual culpability on the part of an Executive Officer); and
- 3) a lower payment or award would have been made or granted to, earned by or vested in the Executive Officer based upon the restated financial results than had there not been such a Restatement.

In each such instance, the amount required to be returned, repaid or forfeited by the Executive Officer shall be the amount by which the Executive Officer’s payment, award or earned or vested amount for the relevant period exceeded the lower payment, award

or amount that would have been made, granted, earned or vested based on the restated financial results.

For purposes of this Policy, the term "Executive Officer" means those persons who are designated by the Board of Directors as "officers" for purposes of Section 16 of the Securities Exchange Act of 1934, as amended, and the rules promulgated thereunder and any cash or equity-based incentive compensation award shall be deemed "received" by an Executive Officer in the fiscal period during which the financial reporting measure specified in such incentive-based compensation award is attained.

The Committee shall make all determinations regarding the application and operation of this Policy in its sole discretion, and all such determinations shall be final and binding. Notwithstanding the foregoing, the Committee may amend or change the terms of this Policy at any time for any reason, including as required to comply with the rules of the Securities and Exchange Commission and the Nasdaq Stock Market LLC implementing Section 954 of the Dodd-Frank Wall Street Reform and Consumer Protection Act. Further, the exercise by the Committee of any rights pursuant to this Policy shall be without prejudice to any other rights that the Company or the Committee may have with respect to any Executive Officer subject to this Policy.

This Policy shall be effective as of the effective date set forth above (the "Effective Date") and shall apply to incentive compensation payments and awards subject to this Policy that are made or granted to Executive Officers on or after the Effective Date.