

## Equinix Australia

### Modern Slavery Statement

Equinix Australia Pty Ltd ('**Equinix Australia**') has prepared this statement in accordance with the requirements of the *Modern Slavery Act 2018* (Cth).

#### 1. Structure and operations of Equinix Australia

Equinix Australia is part of the Equinix group (**Equinix, we, our**). The ultimate parent company of Equinix Australia is Equinix, Inc. Equinix Australia has a number of subsidiaries, which has expanded to include entities from the Metronode Group, which we acquired in 2018.

Equinix Group is the world's digital infrastructure company, enabling digital leaders to harness a trusted platform to bring together and interconnect the foundational infrastructure that powers their success. 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. Equinix Group had 10,013 regular employees as of December 31, 2020.

In Australia, our IBX data centres are present in the top 6 markets across the country. We have 17 International Business Exchange™ (IBX®) data centres nationwide, which are located in Sydney, Melbourne, Perth, Canberra, Adelaide and Brisbane.

#### 2. Our Supply Chains

Our Australian supply chains contain a mixture of global and local suppliers. 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 the more locally based suppliers such as engineering firms, consultancy firms, and other types of service providers.

Our supply chains consist of the materials and utilities needed to provide the space, power and cooling that we offer our customers:

- The space consists of the materials used to build our data centres and the contractors we hire during the construction phases. Additionally, where we lease premises or purchase existing premises, we may engage entities which specialise in construction to 'fit-out' the premises.
- The power and cooling infrastructure consist of equipment inside the sites that bring power to our customers' electronic equipment reliably (including backup generators and UPS units) and maintain the necessary temperatures, airflow and humidity needed to keep our customers' equipment running effectively and reliably (HVAC equipment). Our power supply chain is heavily monitored and managed for both price and environmental concerns.

We also use a variety of suppliers who help us maintain some aspects of data centre operations and reliability, such as physical security measures and security personnel, janitors, waste management companies, etc. and we use a variety of 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. Modern slavery risk areas**

In accordance with the *Guidance for Reporting Entities* produced by the Australian Department of Home Affairs, we know 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. Our Global Procurement function is responsible for carrying out an overall supply side risk factor assessment, which pays particular attention to potential risks of modern slavery in our construction, cleaning supply chains and IBX Operations.

We know that some industries, which involve the increased use of unskilled, temporary and outsourced labour have a higher risk of modern slavery. Similarly, we know that there are greater risks of modern slavery if we source materials from regions which are more exposed to elements such as poor governance, weak rule of law or conflict. We remain vigilant to these risks by requiring our suppliers to confirm compliance with our ethical standards during our due diligence process, and we are undertaking a global programme to assess and monitor our suppliers using a risk-based approach.

### **4. Our risk assessment and due diligence processes**

Equinix's ethics and values are core to our people and culture and how we conduct our business in Australia 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. We require employees to complete our global compliance training, which includes training on our Code of Business Conduct and Anti-Bribery and Corruption. Annual trainings are provided live and online and are available in multiple languages. In addition, we maintain a confidential ethics helpline where employees are encouraged to speak up if they have any questions or concerns that our Code is being violated. Equinix has a zero-tolerance, non-retaliation policy that protects our employees when they speak up.

Our Equinix Code of Business Conduct is also available to those acting on our behalf, such as agents, representatives and partners via a publicly accessible URL site. Consistent with the Code, we expect that our suppliers and partners support and respect the protection of all 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 expect our suppliers and partners to adhere to these same high standards.

These same ethics and values are impugned to our suppliers through a series of due diligence measures, including our Business Partner Code of Conduct. It is our policy that each supplier contract must contain an obligation upon the supplier to comply with the Business Partner Code of Conduct as current from time to time and able to be reviewed or an Equinix approved equivalent document. Since June 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 to comply with our Business Partner Code of Conduct. This requirement has also been part of our global supplier on boarding process since 2015.

We have also 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 to 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 labour in providing the deliverables under the contracts, including our right to request evidence of compliance with such requirements at any time upon reasonable notice. Additionally, each contract stipulates that Equinix must make sure that it does not engage with any suppliers who engage in any practices related to human trafficking, and that it can terminate or not renew the contract with any supplier that engages in these practices.

We also maintain a Global Compliance & Governance function within the Global Strategic Sourcing and Procurement function, which (among other things) is responsible for ensuring global purchasing is in line with our expected standards. This ensures that we carry out proper due diligence and implement appropriate supplier selection criteria that include due regard to ethical standards and corporate values, having regard to Equinix Australia's operations under the *Modern Slavery Act 2018* (Cth).

In 2019, Equinix rolled out a global supplier source-to-pay platform with the aim of driving compliance with applicable modern slavery laws at the point of on-boarding. Having rolled out this global supplier source-to-pay platform, we have also automated the supplier on-boarding and compliance checking process.

We are also evolving our global procurement Know-Your-Supplier initiative to include sustainability and diversity attributes. All new suppliers must agree to terms and conditions that cover environment, health and safety topics, among other priority commitments.

## **5. Our Remediation Processes**

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. 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 20 languages, 24 hours a day, 7 days a week, 365 days a year.

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

## **6. How we assess the effectiveness of our actions**

The primary way in which we assess the effectiveness of the above actions is conducting supplier assessments. Our Know-Your-Supplier starts when a supplier is on-boarded and helps identify any high risk suppliers. Suppliers are then subject to an on-going assessment process against a range of criteria, including compliance with our ethical standards and corporate values, with key suppliers being reviewed more frequently by the Global Strategic Sourcing and Procurement function. Assessments are now being extended to include a range of sustainability and diversity attributes.

We may also determine to conduct reviews and investigations on an ad-hoc basis if issues are raised by whistleblowers, or on our ethics and compliance hotline.

## 7. Our consultation processes

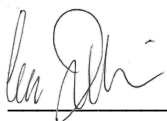
The Equinix Group has a global Approval Authority Policy which aligns across regions based on functions. All companies that form part of the Equinix Australia group adhere to this policy when engaging in consultation processes. Functional teams within the Equinix Group are responsible for designing policies, 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. There is a Global Compliance & Governance team within the Global Strategic Sourcing and Procurement function which is responsible for designing policies and procedures surrounding our procurement activities and interactions with suppliers. As part of that, together with the Global Legal, Compliance and Human Resources teams, it co-ordinates management communication to employees regarding the importance of compliance with these policies and procedures. Using these means of communication, there is ongoing dialogue within the Equinix Group, including the Equinix Australia group, to ensure that modern slavery risks have been appropriately identified, assessed and addressed and that these other entities are aware of what actions they need to take. This process of consultation culminates in Equinix Australia being in a position to approve this statement as confirmed below.

## 8. Our Shared Commitment

As the leading global interconnection and data centre company, we are dedicated to powering, protecting and connecting the organizations and ecosystems that will shape this new era, and doing so in a sustainable and responsible way. We are driven by a shared commitment to deliver strong operating performance while never losing sight of our #InServiceTo mindset...in service to each other, to our customers, to our shareholders and to the communities in which we operate.

For comprehensive information on all our sustainability efforts please visit our sustainability website: [Sustainability.Equinix.com](https://Sustainability.Equinix.com)

This statement was viewed and approved by the board of directors of Equinix Australia via a circular resolution on 23 June 2021. Mr Guy Danskine has been authorised to sign this modern slavery statement made pursuant to the *Modern Slavery Act 2018* (Cth).



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Guy Danskine  
Managing Director, Australia