

## Modern Slavery Statement (Australia)

Equinix Australia Pty Ltd (**Equinix Australia**) has prepared this statement in accordance with the requirements of the *Modern Slavery Act 2018 (Cth)* in respect of Equinix's actions and activities during the financial year ending 31 December 2022.

### 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 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. Equinix had 12,331 regular employees as of 31 December 2022.

In Australia, our International Business Exchange™ (IBX®) data centres are present in the top 6 markets across the country. We have 18 IBX data centres located throughout Sydney, Melbourne, Perth, Canberra, Adelaide and Brisbane.

### 2. Our supply chains

Our 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 assessment and governance, which includes identifying potential risks of modern slavery across all of our suppliers with special attention to people-intensive industries (such as construction, janitorial, hospitality, etc.).

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 factors 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 taking steps to enhance our global Supplier Risk Management 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 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.

As our baseline, Equinix's ethics and values are clearly embodied in our [Code of Business Conduct](#). We have compliance 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. Our trainings cover various topics in our Code of Business Conduct, including human rights and anti-bribery and corruption, and are provided live and online and available in multiple languages. Equinix's Code of Business Conduct 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 of Business Conduct 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 that our suppliers and partners 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 expect our suppliers and partners to adhere to these same high standards, which we share in our Equinix [Business Partner Code of Conduct](#).

Since June 2015, our Global Purchasing Policy requires that: a) suppliers receive an electronic copy of the Business Partner Code of Conduct; b) our supplier contracts contain an obligation upon the supplier to comply with the Business Partner Code of Conduct; and c) 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 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, our supplier contracts stipulate that Equinix does not engage with suppliers who engage in any practices related to human trafficking and that Equinix maintains its right to terminate or not renew its contract with any supplier that engages in these practices.

To support our due diligence processes and enforce our expectations of suppliers, we have established a governance function within our Global Procurement Supply Chain ESG organization. The responsibilities of this function include ensuring that Equinix's operations and purchasing activities are in line with our supplier policies and standards, including proper due diligence and appropriate supplier selection criteria, with due regard to the ethical standards and corporate values set forth under the *Modern Slavery Act 2018 (Cth)*.

In 2019, Equinix rolled out a global supplier source-to-pay platform to identify and manage supplier risks, assign roles and responsibilities for supplier due diligence and monitoring, and document our supplier assessments. Throughout 2022, we made additional investments in digital tools and automation to support our supplier risk management processes. In 2023, we have continued to devote resources in this area.

#### **5. Our remediation processes**

Equinix is committed to continuous improvement including 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 22 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**

Equinix has various measures to monitor and assess the effectiveness of its actions, including tracking the number and completion rates of internal compliance trainings that we have rolled out to employees, the proportion and number of

complaints resolved by our confidential ethics helpline, and a number of due diligence procedures and preventive controls that we have developed and implemented with our suppliers and business partners.

In 2022, we began implementing a triannual supply-chain Human Rights Impact Assessment to measure the effectiveness of our controls and benchmark our internal management systems against the requirements of applicable modern slavery legislation and best practices.

As a global company, Equinix must comply with laws in all places where we do business. Our Code of Business Conduct and compliance trainings make clear that all employees are responsible for understanding and complying with the laws and regulations that affect their jobs. In this way, we proactively avoid monetary and reputation risks associated with non-compliance. As an indicator of our compliance controls and operations, in 2022 Equinix received no significant or material fines or non-monetary sanctions for non-compliance with laws and regulations.

#### **7. Our consultation processes**

Equinix 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 Equinix are responsible for designing policies, procedures and training programmes relevant to the function's areas of expertise to help all employees know about and act within all relevant laws and Equinix policies. The Supply Chain ESG Governance team within the Global Procurement function creates, maintains and oversees the relevant policies and procedures surrounding our procurement activities and interactions with suppliers. Together with Global Legal, 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, including Equinix Australia, 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. 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, responsible and respectful way. We are driven by a shared commitment to deliver strong operating performance while never losing sight of our #InServiceTo 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/>

This statement was viewed and approved by the board of directors of Equinix Australia via a circular resolution.

Mr Guy Danskin has been authorised to sign this modern slavery statement made pursuant to the *Modern Slavery Act 2018* (Cth).



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Guy Danskin  
Managing Director, Australia