



EQUINIX

EQUINIX BUSINESS PARTNER CODE OF CONDUCT



INTRODUCTION

Equinix is a global 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 applies to all Equinix Business Partners, including but not limited to our vendors, resellers, consulting partners, suppliers, 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.

We value our Business Partners who join us in supporting these common goals of integrity and ethical business practices.

The Workplace

Non-Discrimination or Harassment

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

Safe Conditions

Equinix 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

Equinix Business Partners should avoid situations that create, or even appear to create, a conflict of interest with Equinix. Transparency is essential to avoiding conflicts of interest. If an Equinix Business Partner employee has a spouse, relative or close friend who works for Equinix, you should disclose that relationship to the Equinix Compliance Office or ensure that the Equinix employee does so. Equinix employees and their family members may not hold a material financial interest in an Equinix Business Partner and Equinix Business Partners are required to avoid such relationships with Equinix employees.

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. Equinix Business Partners should never offer or provide any gift or entertainment to an Equinix employee or family member 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.

Equinix Property

Confidential Information and Equinix Property

Any confidential information about Equinix that you may become aware of as an Equinix Business Partner, including everything you know about Equinix, our customers, our vendors and other third parties that is not available to the public, must be kept strictly confidential. Your responsibility to protect our confidential information continues even after the completion of your assignment or contract with Equinix. Equinix Business Partners must protect and conserve Equinix's valuable property and resources and use them only for legitimate business with Equinix.

Intellectual Property

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

Laws and Regulations

Anti-Bribery and Corruption

At Equinix, our business practices are based on honesty, integrity, and compliance with the law. Equinix Business Partners must not offer, provide, authorize, or receive bribes, kickbacks or other improper payments for any reason. Equinix Business Partners also must 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.

Competition and Fair Dealing

Equinix is committed to dealing fairly and honestly with all of 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 Equinix Business Partners are selected on a competitive basis and establish a mutually beneficial relationship based on close cooperation and open communications. Equinix 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.

Insider Trading

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

Reporting Misconduct

Reporting

You are encouraged to report to Equinix any conduct, including conduct of any Equinix employee, that you believe in good faith to be an actual, apparent or potential violation of this Code. 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 Business Partner Code of Conduct.

Equinix Business Partners can contact the Equinix Compliance Office with questions about the Business Partner Code of Conduct or to report a potential violation at compliance@equinix.com



EQUINIX

WHERE OPPORTUNITY CONNECTS