

# POLICY

# WHISTLEBLOWER PROTECTION

Effective 03/21/16

Last revised 03/07/19

## Purpose

This Whistleblower Protection Policy outlines the protections under U.S. law for corporate “whistleblowers.”

### I. Introduction

Our reputation as an ethical company depends on all of us working together to ensure our high ethical standards are upheld. We believe it is essential to create an environment in which individuals feel able to raise any matters of genuine concern without fear of retaliation, confident that their concerns will be taken seriously and acted upon by the Company.

Sometimes it may seem easier to keep quiet if you see someone violating our Code of Business Conduct, but doing nothing can result in serious consequences. Speaking up when you observe illegal or unethical behavior means you care about ensuring we maintain an ethical workplace. When you speak up, you can be assured that your concern will be addressed promptly and in confidence.

### II. Scope

The Whistleblower Protection Policy is applicable to every Equinix officer, director and employee, including part-time and temporary employees.

### III. Your Reporting Responsibility

You have the right and the responsibility to protect our Company from conduct that violates our Code of Business Conduct. Speaking up is an important part of our Code and the ethical workplace we maintain. All of us have an obligation to report promptly suspected Code violations and to ask questions, raise issues and seek guidance when the right course of action to take is unclear.

### IV. Confidentiality and Treatment of Reports

Equinix will handle all inquiries and reports discreetly and, to the extent possible and within the limits allowed by law, preserve the confidentiality of anyone reporting a possible violation or providing information in an investigation. When you speak up, you can expect that your report will be investigated promptly, professionally and thoroughly.

### V. Protecting Whistleblowers

Equinix is committed to protecting the rights of any individual who reports concerns to Equinix. We prohibit retaliation against any individual who, in good faith, reports a suspected violation of the law or our Code of Business Conduct or assists with an investigation. Any type of retaliation against an employee for reporting a concern in good faith is itself a serious violation of our Code of Business Conduct and should be reported. Any employee found to have engaged in such retaliation is subject to appropriate disciplinary action, including termination of employment at Equinix.

### VI. Limit on Protection

If you knowingly make a report or provide evidence which is false or do not in good faith believe is truthful and accurate, you will not be protected under this policy and may be subject to disciplinary action, including termination of your employment at Equinix.

### VII. How to Report

Your concerns are important to us. If you see a possible violation of Equinix’s Code of Business Conduct, Company policies, laws or regulatory requirements, it is important to report your concerns as soon as possible.

To help you speak up about your concerns, Equinix offers a variety of reporting options. You may also use these resources to ask questions or obtain guidance regarding a business practice or compliance issue.

- You may report your concern directly to management by contacting:
  - Mary Anne Wellman, Equinix Chief Compliance Officer
  - Brandi Galvin Morandi, Chief Legal Officer and Chief Human Resources Officer
- You may report your concern using Equinix’s Ethics and Compliance Helpline which is available 24 hours a day, 7 days a week and managed by NAVEX, an independent third-party:
  - The Ethics and Compliance Helpline can be accessed via the web at <https://equinix.ethicspoint.com>