



Modern Slavery and Human Trafficking Statement for FY2021

June 2022

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Introduction

This statement is a joint statement made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 and the Australia Modern Slavery Act 2018 and constitutes the statement against modern slavery and human trafficking by Akamai Technologies, Inc., Akamai Technologies, Limited. (Company Reg. Number: 03921701) (“**Akamai UK**”), and Akamai Technologies Netherlands, B.V. (Australian Branch) (ABN: 52 115 435 955) (“**Akamai Australia**”) for the fiscal year 2021.

Our Structure, Operations, and Supply Chain

Akamai Structure

Akamai Technologies, Inc., is a listed company (NASDAQ:AKAM) registered in the United States under the laws of Delaware and headquartered in Cambridge, Massachusetts. The company is comprised of around 59 subsidiaries (hereinafter collectively referred to as “**Akamai**”) and has offices in 57 locations globally¹. Akamai provides solutions to secure and deliver content and applications via the Internet.

As of December 31, 2021, we had over 8,700 employees worldwide, located in more than 30 countries and representing over 90 nationalities, which brings a diverse, inclusive, and global perspective to our operations. Around 1% and 2% of our global workforce are based in Australia and the United Kingdom respectively.

Our employees – our human capital – are our most valuable assets. It is our belief that an engaged employee base is critical to having a productive, ethical, and inclusive workplace needed to successfully and sustainably compete in today’s marketplace.

Akamai is an equal opportunity employer that values the strength that diversity and inclusion brings to the workplace. All qualified applicants for employment are considered fairly, and we do

¹ A complete list of Akamai affiliates is available at <https://www.akamai.com/us/en/about/akamai-affiliates.jsp>. A list of our locations can be found at <https://www.akamai.com/company/locations>.

Akamai Operations

Akamai provides solutions to power and protect digital experiences. For more than 20 years, Akamai has managed the Akamai Intelligent Edge Platform to create a worldwide network of servers located at the “edge” of the internet. Our approach has provided us with unique visibility and insight into traffic volumes, congestion, attack patterns, vulnerabilities, and other activities across the internet’s complex cloud of networks and systems. Leveraging these insights and our position at the edge, we offer solutions designed to protect our customers from threats and attacks, while empowering them to securely deliver their business as they engage, entertain, and interact with their customers; and extend their internal systems beyond their corporate perimeters to control access and better leverage the cloud.

We market and sell our solutions globally through our direct sales and services organization and through many channel partners including AT&T, Deutsche Telecom, IBM, Optus, Telstra, British Telecommunications plc, Orange Business Services and Telefonica Group. In addition to entering into agreements with resellers, we have several other types of sales and marketing focused alliances with entities such as system integrators, application service providers, referral partners, and sales agents. By aligning with these partners, we believe we are better able to market our solutions and encourage increased adoption of our technology throughout the industry. Our sales, services, and marketing professionals are based in locations across the Americas, Europe, the Middle East, and Asia and focus on direct and channel sales, sales operations, professional services, account management, and technical consulting.



Akamai Supply Chain

During the fiscal year 2021, Akamai engaged with more than 3200 suppliers from 64 countries globally. In Australia, we engaged with 58 suppliers (from 3 countries). In the UK, we engaged with 137 suppliers (from 7 countries).

Akamai's supply chain includes the suppliers of equipment needed to build and maintain the Akamai Intelligent Edge Platform, as Akamai does not manufacture any servers or related equipment. Our main server suppliers are located in the U.S., Canada and Mexico.

In addition, Akamai contracts with external vendors and suppliers that provide goods and services that relate chiefly to the provision of office space, information technology and professional services.

Akamai's major categories of spend include server equipment, real estate, energy and utilities, facility maintenance and repairs, payroll services, professional services (including legal and accounting services), information technology and telecommunications, travel and entertainment, courier and delivery, public relations, and marketing.

Our Policies

Akamai believes that respect for human rights is fundamental to unlocking the potential of the Internet and an essential value for our employees and the communities in which we operate. We are committed to providing an inclusive environment that is free from illegal and inappropriate behavior.

Akamai stands against the damaging effects of slavery, servitude, forced or compulsory labour, and human trafficking in societies around the world. We are committed to the principle that our employees – and those of our suppliers and contractors – should be treated with dignity and respect at all times.

Under our [Code of Ethics](#), Akamai employees are expected to report concerns – including those relating to modern slavery and human trafficking – and management is expected to act appropriately and in accordance with applicable laws in response to such reports. Concerns may be reported to supervisors, company management, or our Human Resources, Legal, and Global Ethics & Compliance departments. All employees are also able to report concerns through our confidential and independently hosted Ethics Hotline, available online and via telephone.

Akamai has also developed a [Human Rights Policy](#) and [Supplier & Partner Guiding Principles](#) that address, among other things, modern slavery, human trafficking, and other labor abuses or human rights violations. These policies embody our corporate values and the international principles encompassed by:

- the Universal Declaration of Human Rights;
- the International Labor Organization's Declaration on Fundamental Principles and Rights at Work;
- the United Nations Global Compact; and
- the United Nations Guiding Principles on Business and Human Rights.

Risks of Modern Slavery Practices and Mitigation Procedures

Building and maintaining our network of servers is critical to Akamai's business, and Akamai purchases servers from external suppliers as we do not manufacture them internally. We recognize that potential human rights / modern slavery risks are associated with our server supply chain. Our server suppliers, which have manufacturing operations based in Canada, Mexico and elsewhere, are members of the Responsible Business Alliance, a non-profit organization that has played a critical role in driving collaboration in the electronics industry, organizing activities around the common goal of promoting social, ethical, and environmental responsibility in the electronics supply chain.

Akamai routinely engages with our suppliers and vendors, and these relationships are reviewed regularly. Our suppliers and vendors are contractually required to conduct themselves in a manner that is consistent with our [Code of Ethics](#), [Human Rights Policy](#) and [Supplier & Partner Guiding Principles](#). Our contracts also specifically require them to comply with laws and regulations related to the payment of minimum wages and overtime, and non-discrimination in employment. Akamai has the contractual right to audit our suppliers' and vendors' records to

review such compliance, and we contractually reserve the right to terminate any engagement in which we become aware of conduct that violates applicable law, regulation, and policies.

Akamai is committed to maintain a responsible supply chain through engagement in mutually beneficial relationships with diverse, environmentally and socially conscious, and responsible suppliers. Akamai's Responsible Supply Chain Program ("RSCP") has been designed to engage and monitor our suppliers and vendors to align with our corporate goals and values in ESG areas, including those concerning modern slavery. In 2021, we launched our revamped program with our top global suppliers to help mitigate supply chain risks, create opportunities for diverse representation, protect our stakeholders, and inspire better business practices. In partnership with these top suppliers, we are baselining their ESG performance today and establishing goals designed to achieve meaningful ESG improvement by the year 2030.

In addition to our suppliers and vendors, Akamai conducts due diligence on its channel partners and resellers to help ensure that parties that work with us or on our behalf, conduct business in a manner that is consistent with our [Code of Ethics](#), [Human Rights Policy](#) and [Supplier & Partner Guiding Principles](#). Our diligence program includes:

- undertaking due diligence procedures on prospective and existing partners/resellers;
- putting approved partners/resellers on notice of our expectations and [Code of Ethics](#);
- conducting periodic compliance reviews, using a risk-based approach; and
- encouraging the reporting of ethical concerns.

Training, Culture, and Accountability

Through the RSCP, Akamai provides training to help educate employees about the risks of modern slavery and human trafficking in our supply chain and in our business. In addition, Akamai delivers training to its largest suppliers and vendors by hosting periodic Supplier Summits. Numerous stakeholder functions (e.g., Legal, Finance, Human Resources, etc.) collaborate to provide these employee and supplier / vendor trainings to drive awareness across a broad range of issues and to ensure that appropriate guidance and support is provided.

Our CEO and executive management help foster an ethical corporate culture by establishing a clear tone at the top, regularly emphasizing the importance of Akamai's values and [Code of Ethics](#), and holding managers accountable for communicating these expectations to all

employees. In turn, employees are held accountable – and may subject to disciplinary action up to and including termination – if their actions fail to meet these expectations.

Akamai is also a member of Ceres, a sustainability non-profit organization working with the most influential investors and companies to build leadership and drive solutions throughout the economy, working on issues like carbon asset risk, climate crisis and human rights. Through powerful networks and advocacy, Ceres tackles the world's biggest sustainability challenges, including climate change, water scarcity and pollution, and inequitable workplaces.

Akamai established a dedicated Environmental, Social and Governance (“**ESG**”) Office in February 2021 that provides a cohesive approach to ESG matters across Akamai, including on modern slavery and human trafficking. The ESG Office plays a crucial role in helping Akamai serve as a catalyst for positive, systemic change and positive impact for our customers, investors, employees, and communities.

Further information on what Akamai is doing in the ESG space can be found in the [Akamai 2021 ESG Impact Report](#).

Next Steps

In October 2021, as part of our RSCP, we sent to our global top 100 suppliers (by 2020 spend) our RSCP Questionnaire to assess their commitment in areas like human rights and labour practices, diversity & inclusion, and sustainability, among others. As of December 2021, 82% of these suppliers provided their responses to the Questionnaire. During FY22, Akamai will review and analyze the responses of the suppliers and plans to reach out to those suppliers with responses that flag up any areas of concern, including for human rights and labour practices, and work together with them to help them improve in such areas and also their grades for the 2021 Questionnaire.

The RSCP Questionnaire will be sent out annually to Akamai global Top 100 suppliers, with goals of measuring improvements over time and towards 2030 goals.

Akamai also plans to develop and provide by the end of 2022 a more specific employee training module on modern slavery to raise awareness amongst management and employees on what are the various forms of modern slavery, provide the tools to identify it, and how to report suspected modern slavery violations.

Signatures

This joint statement was prepared by Akamai's ESG Office, Legal and Ethics & Compliance departments, and approved by Akamai Technologies, Inc., Akamai UK, and Akamai Australia (including by way of board resolutions of Akamai UK and Akamai Australia). In the preparation of this joint statement, Akamai's ESG Office, Legal and Ethics & Compliance departments engaged and consulted with the reporting entities covered by this statement and the entities owned and/or controlled by Akamai Technologies Netherlands B.V. Akamai UK does not own or control any other entities.



Jeffrey Huang

Chief Ethics & Compliance Officer

Akamai Technologies, Inc.



Gerald Deck

Director

Akamai Technologies Netherlands, B.V.

(Australian Branch) (ABN: 52 115 435 955)

and

Akamai Technologies, Limited.

(UK Co. Reg. No.: 03921701)