

CODE OF ETHICS

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Dear Colleagues:

If you're like us, you feel an enormous sense of pride in all that Akamai has accomplished since our founding in 1998. Starting with some brilliant algorithms at MIT, Akamai has transformed our customers' use of the Internet from a chaotic network into a predictable, scalable, and secure business platform. We now routinely carry a significant portion of the world's Web traffic and increasingly are responsible for delivering and processing critical data for some of the world's most respected enterprises and government entities.

Our collective dedication and commitment to excellence not only have made these accomplishments possible but have earned us the trust of our customers, suppliers, shareholders, and colleagues. To remain worthy of that trust, we must always conduct ourselves with the highest degree of integrity.

To help us meet that standard, we have established the following Guiding Principles for how we make business decisions:

- We conduct business in a way that earns and maintains the trust of our customers, partners, shareholders, and colleagues
- We create superior customer satisfaction and shareholder returns
- We act ethically and responsibly
- We provide a great place to work
- We strive continuously to be innovative and profitable ... and to have fun

We expect every employee, director, contractor, and advisory board member to exercise the highest level of excellence and integrity and to comply with the Guiding Principles, this Code, Akamai's policies, and all applicable laws, rules, and regulations. Not only is this the right thing to do, it is key to help ensure that we continue to be successful in the future.

Tom Leighton

Chief Executive Officer

Melanie Haratunian

Executive Vice President, General Counsel

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INTRODUCTION



Why do we have a Code of Ethics?

Akamai and our affiliates are dedicated to operating at the highest level of excellence, honesty, fairness, and integrity. We are committed to obeying the law and treating others with respect. We depend on you to help do so.

You must deal honestly, ethically and fairly with our customers, suppliers, competitors, and employees.

You may not take unfair advantage of another person or company through manipulation, concealment, misuse of confidential information, lying, or other improper dealing.

You should never represent us in a manner that violates the trust of the Company or embarrasses us, our customers, shareholders, or other employees.

This Code of Ethics (the “Code”) is designed to help you keep these values in sight as you conduct business on Akamai’s behalf.

While the Code covers a broad range of activities and provides numerous examples of actions and situations that are either prohibited or acceptable, it cannot address every ethical or difficult situation that may arise. If you are faced with a situation that you believe is not covered here, [Ask Compliance](#) on Aloha Community or send an email to ethics@akamai.com

At Akamai, we appreciate the diversity of our workforce and the uniqueness of every employee. Akamai is committed to a work environment free from all forms of inappropriate behavior, including unlawful harassment and discrimination. Abusive, harassing, or offensive conduct is unacceptable and will not be tolerated.

Who is Covered?

The Code applies to all of our directors, employees, contractors and advisory board members across the world.

Before taking action, anticipate how your action could be perceived, including asking yourself:

- Is my action consistent with Akamai’s Guiding Principles and values?
- Does my action conform with the spirit of this Code?
- Could my action create even the appearance of impropriety or otherwise potentially embarrass the Company?

Example: In making employment decisions – such as hiring, training, compensating, promoting, transferring, disciplining and terminating employees – you must not discriminate on the basis of an individual’s race, color, religious creed, national origin, gender, sex, pregnancy or parental status, sexual orientation, gender identity, gender expression, medical condition, physical or mental disability, genetic information, age, military or veteran status, ancestry, marital status, or any other category protected by Akamai’s policies or the Laws applicable in the location in which you work.

Consequences for Violations of the Code

If it is determined that you have violated the Code or any law, rule or regulation, Akamai will take appropriate disciplinary action against you. This may range from a warning to termination to referral for criminal prosecution or other disciplinary action that Akamai deems appropriate, depending on the circumstances. In addition, any manager who has knowledge of a suspected or actual violation and fails to report it to Global Compliance or an [appropriate person](#) will be subject to disciplinary action, up to and including termination.

How to Ask Questions and Raise Concerns

As a member of the Akamai team, it is your responsibility to report any apparent violation of the Code that becomes known to you. Doing so is not an act of disloyalty but rather is evidence of your commitment to protect Akamai and preserve our culture of ethical business and trust. We encourage you to ask questions if you find yourself considering something that is against the Code but you feel is legal or acceptable where you live.

If for any reason you prefer to remain anonymous, you may call an independent third party who can be reached at (877) 888-0002 (if you are calling from the U.S.) or +1-770-810-1147 (if you are calling from outside the U.S.). There is also a [web form](#) that you can submit confidentially.

Other Policies

The Code works in conjunction with these additional Akamai policies and they should be considered a part of it:

- [Akamai's Employee Handbooks](#)
- [Anti-Corruption and Anti-Bribery Policy](#)
- [Policy on Trading in Akamai Securities](#)
- [Policy on Social Media and Blogging](#)
- [Policy for Managing Disclosure of Material Information](#)
- [Policy on Protecting Confidential, Proprietary and Personal Information](#)
- [Record Retention Policy](#)

The easiest way to raise an ethics concern or pose a question is to [Ask Compliance](#) on Aloha Community, the ethics hotline, his/her manager, or email ethics@akamai.com.

GIFTS AND ENTERTAINMENT

Akamai makes decisions on whether we do business (and how much) with others based solely on the quality, performance, and cost of their offerings. Similarly, we expect customers and partners to do business with us because of the superiority of our offerings.

Gifts, meals, travel, entertainment, gratuities and other amenities (“Gifts and Entertainment”) should never be given or received in exchange for action (or inaction) by the recipient or the hope they will do (or refrain from doing) something. We must take care to avoid even the appearance of impropriety in this area.

With that in mind, Gifts and Entertainment of modest value may be allowed when dealing with non-government entities. If a government entity or employee is involved, stringent rules and limits apply. We provide guidelines below to help your decision-making in these areas.

Here’s a quick overview of when you need to obtain pre-approval:



- When Government Persons are involved — Always
- General gift/entertainment — \$150
- Sporting events/other combined meals/entertainment — \$300

[Get that pre-approval via this form!](#)



Need to know how and when it’s appropriate to get entertainment for fellow employees reimbursed?

Check out the [Expense Reimbursement Policy](#) for more information.

Providing Gifts and Entertainment to Non-Government Business Associates

Gifts

You may give a gift or use Akamai funds to provide a gift to an employee, advisor, or other person involved with a current or prospective business partner of Akamai only if such a gift:

- is of modest value
- is not a frequent occurrence
- is not in exchange for any action or inaction by the recipient
- is customary / appropriate under the circumstances
- will not embarrass Akamai if publicly known

The price of a gift generally is considered of modest value if it has a retail value of less than US\$150. If you believe that there is a legitimate reason to exceed this limit, you need to get the prior approval of Global Compliance, who at their discretion may also escalate to your SVP/EVP for their approval. You can obtain pre-approval via [this form](#).

Trips, use of vacation homes, and other lavish gifts are inherently compromising and should not be given.

The following gifts are expressly prohibited without the prior approval of Global Compliance:

- cash
- gift cards of any sort (such as online store gift cards, iTunes gift cards, Starbucks gift cards)
- any other cash equivalent

Meals and Entertainment

You may offer business meals and entertainment to Business Associates - those representatives of other companies that Akamai does business with - only if they:

- are of modest value
- are not a frequent occurrence
- are not in exchange for any action or inaction by the recipient
- are customary/ appropriate under the circumstances
- will not embarrass Akamai if publicly known

Outside the U.S., for all dollar amounts mentioned you should use the equivalent value of the local currency.

Example: You learn that your long-time business contact has passed away. You want to send flowers on behalf of Akamai, but are concerned that an arrangement priced below our \$150 gift guideline may reflect poorly on us.

So long as you get pre-approval from Global Compliance, sending a flower arrangement that exceeds the guideline of US\$150 would not violate the Code.

Example: You want to give five employees at your biggest customer gift cards for an online retailer valued at the equivalent of US\$140 for 8 different holidays.

This is not allowed! Gift cards are prohibited unless approved in advance by Global Compliance. In addition, going below US\$150 does not make up for the fact that giving such cards to numerous Business Associates on eight different occasions violates the spirit of the Code.

Example: After closing a major upgrade with a long-time customer, a colleague suggests taking the team that worked on the transaction out to celebrate at an adult entertainment venue. Even if you were to stay within the per person-spending guidelines, such an event would not be permissible under the Code since the value is not modest under the circumstances, the venue is not appropriate for business entertainment purposes, and such entertainment could potentially cause embarrassment for Akamai. Akamaiconsiders adult

As a guideline, the price of a meal generally is considered reasonable if it is less than US\$150 per person, the price of entertainment (sporting event tickets, concerts, etc.) generally is considered reasonable if it is less than US\$150 per person, and if the invitation includes both a meal and entertainment, the combined price of both the meal and entertainment generally is considered reasonable if it is less than US\$300 per person.

If you believe there is a legitimate need to exceed these amounts, you need to get the prior approval of your manager and Global Compliance. You can raise that pre-approval request via [this form](#).

If you unexpectedly exceed these guidelines at a dinner or other event, afterwards you should promptly contact Global Compliance to review the situation and obtain approval of the expenses prior to submitting them for reimbursement.

Receiving Gifts and Entertainment from Business Associates

The same guidelines and value thresholds apply when you are receiving a gift or entertainment from a non-government client. Gifts and Entertainment must:

- be appropriate as to time and place
- not be in exchange for any action or inaction on your part
- not cause Akamai embarrassment if publicly known
- be of reasonable price
- be infrequent

The price of customary business-related entertainment (such as a golf outing or a local sports, cultural, or civic event) may be deemed reasonable even if it exceeds the \$150 per person guideline, so long as the price is reasonable, the entertainment (and any associated meal) otherwise meets the bulleted standards above, and your EVP/SVP or Global Compliance pre-approves the invitation.

entertainment venues and similar establishments to be inappropriate locations for conducting business or entertaining and as such, attendance at, or use of, any strip clubs, "gentleman's clubs", escort services, sex workers, brothels, or any other adult entertainment venues in connection with any business activity, is not permitted. Other situations, such as expensive "bottle service" at night clubs and other immodest indulgences could create similar concerns. When in doubt, Ask Compliance.

Example: You want to take a customer out to dinner, but your principal contact has expensive tastes. What should you do? You could select a restaurant that is interesting but not so expensive. Often, wine causes the bills to be above our guidelines; call ahead and pre-order wine that is reasonable. Seek pre-approval for the dinner if it is likely to exceed the guidelines.

Example: You are responsible for choosing the vendor who will supply us with a US\$1,000 printer. You arrive at work one morning to find a US\$250 clock with a note thanking you for your consideration of XYZ Supplier Corp, a supplier soliciting Akamai's business from you. To avoid violating the Code, you are expected politely to return the clock.

You can raise that pre-approval request via [this form](#).

If you are in a situation where a gift or invitation may exceed these guidelines, you need to get the prior approval of Global Compliance, who at their discretion may also escalate to your SVP/EVP for their approval, to accept them.

If you are offered a gift or invited to a meal/event that is inconsistent with these standards or otherwise appears inappropriate, inform the business associate of our Code, courteously decline and/or return any gift or invitation received, and notify Global Compliance. If you must accept the gift or invitation to avoid causing embarrassment or offense to the person offering it, you may accept the gift on behalf of Akamai, so long as you promptly report it to Global Compliance and turn it over to the Company.

Guidance on Common Situations

Akamai-Sponsored Events

From time to time, we may have tickets to a cultural or sporting event or other forms of entertainment. In distributing access to such events, the order of priority should generally be as follows:

1. Customers
2. Individual employees who work directly with the particular customer that is the focus of the event
3. Other meritorious employees
4. Others such as spouses, children and/or friends of Akamai employees

Offers to attend entertainment events of this kind can be changed or revoked at any time if needed in order to better satisfy Akamai's best interests (e.g., if a customer previously indicated that she could not attend but changed her mind, it may be required to revoke an invitation made to an Akamai family member).

If the nature of the event or other circumstances suggest that the priorities listed above should not be followed, you should contact Global Compliance for approval prior to attending the event.

Example: A valued client has given you a watch as a thank you for the Akamai relationship. It costs more than \$150. In your country, it would be seen as rude to refuse to accept the gift. How should this be resolved?

If you must accept the watch, make it clear that you are accepting on behalf of Akamai (rather than individually) and then promptly notify your supervisor and give the watch to Akamai (e.g., your your EVP or manager could then use the watch to reward an employee in your department or country for their exemplary performance).

Example: Akamai has a luxury suite for a sports game and 12 tickets. Can you and your wife take two of the tickets?

Usually, no. Tickets should primarily be offered to Akamai customers and Akamai personnel who have a direct relationship with those customers and would help host the event. Only if there are still extra tickets after doing so, it may be appropriate to invite your partner, assuming your manager and Global Compliance approves and other partners/spouses will be attending.

Business Associate Offers Tickets or the Right to Buy Tickets to a Premium Event.

A customer or vendor may offer you tickets to an event. In addition to the guidelines on whether the opportunity is reasonable in terms of price and is otherwise appropriate, the order of priority in distributing such tickets or the opportunity to purchase such tickets should generally be as follows:

1. Individual employees who work directly with the particular customer or vendor that is the focus of the event
2. Other meritorious employees
3. Others such as spouses, children and/or friends of Akamai employees

If the nature of the event or other circumstances suggest that the priorities listed above cannot be followed, you should contact your manager and the Global Compliance for approval prior to attending the event. Also see the section that follows.

Events and Family Members and Friends

Customers, suppliers, or others may specifically invite an Akamai employee and a spouse, child, or friend to attend an event, or Akamai might host a customer or vendor event to which spouses or friends (both yours and those of a customer or vendor) are invited. **Subject to the reasonableness and appropriateness guidelines above, it is often possible to accept such an invitation.**

However, if the event involves travel or the payment of expenses for your spouse or friend by a customer or vendor, you should obtain prior approval from your manager and Global Compliance. **Unless it is an Akamai-sponsored event that specifically includes family members or friends that has been approved in advance by Global Compliance, who at their discretion may also escalate to your SVP/ EVP for their approval, Akamai will not reimburse expenses associated with your family member's or friend's participation.**

It will rarely be acceptable for an Akamai employee to request to bring a family member or friend to an event if that was not part of the invitation. If you have questions about whether it is appropriate to accept an invitation involving a friend or family member that is not described above, you should consult Global Compliance prior to accepting the invitation.

Example: A customer offers you four US\$200 tickets to a show.

You should decline: the dollar amount of the tickets is considerably above the US\$150 guideline above. Therefore, you will need to get the prior approval of the Global Compliance.

Example: Your principal contact at a vendor is in town with his wife and invites you and your partner out to dinner. Subject to the dollar limitations and other applicable guidelines, it is okay to accept the invitation.

A Business Associate Has Access to Tickets or an Event and You Would Like to Attend

Over the years, Akamai has developed relationships with numerous sports leagues, media and entertainment companies and other organizations that produce enticing events. Many times admission to these events is exclusive or very expensive.

It is generally not permissible under the Code for Akamai personnel to leverage these relationships to try to get access to tickets or admission to events for personal use.

There is a difference between being invited to an event by a customer or a vendor and proactively reaching out and asking a customer or vendor for help in buying or otherwise getting tickets to an event. The former is permitted and the latter is prohibited.

The solicitation of benefits is rarely permitted and then only after Global Compliance, who at their discretion may also escalate to your SVP/EVP for their approval, has determined that the request is not against Akamai's interest and provides you with prior approval.

Gifts and Entertainment involving Government Persons

All invitations involving family members or friends of a Government Person must be pre-approved by Global Compliance and your SVP/EVP. Please also refer to the section on Gifts and Entertainment involving Government Persons, below.

Doing business with government entities is different than doing business with commercial businesses. There are numerous Laws, rules, and regulations that impose strict requirements on contractors and businesses, like Akamai, that do business with the government; gifts and entertainment valued even at nominal amounts could be illegal or subject you and/or Akamai to sanctions. These Laws, rules, and regulations are in place to protect the public trust and violating them may cause us to lose valuable government contracts and subject us to civil fines and criminal sanctions.

Bribes and kickbacks are criminal acts that are never proper and are strictly prohibited by Law.

Example: Your favourite sports team is playing; the game is completely sold out but you know that Akamai has a relationship with the stadium. Is it okay to ask someone on the stadium team to see if there's a way for you to get or buy tickets from the office to the game?

No. In the Conflicts of Interest section of the Code above, it's clear that you may not exploit your position with Akamai to solicit any benefit on terms or conditions more favorable than those generally available to the public and that are made available because of your position at Akamai.

Before you offer anything to a government employee or employee of a state-owned enterprise, or are unsure if they're a government official, raise a pre-approval request via this form or by emailing ethics@akamai.com. Be prepared to provide the a description of the gift or entertainment, the amount of money, the individuals involved, whether there is any pending business involving the recipient, and the reason for offering or accepting it.

Restrictions on Gifts and Entertainment

You may not offer, promise, give, solicit, or receive any form of bribe or kickback anywhere in the world.

No Akamai employee may pay any sum of money or provide anything of value (gifts, entertainment, travel, job offers, internships or scholarships for family members, etc.) to government officials, agencies or organizations for the purpose of obtaining, retaining, or directing business or any other commercial advantage with such agencies or organizations without pre-approval from Global Compliance.

You also may not make charitable or political contributions that are intended to influence the behavior of a government agency or person in favor of Akamai.

These restrictions also apply to channel partners, consultants and agents acting on our behalf; you may not provide them with rebates, discounts, or credits to enable them to offer or give bribes or kickbacks.

Who is a Government Official or Entity?

While in many cases the answer is obvious, this can sometimes be a tricky question. Even private companies with significant government ownership, like a state-run airline or telecoms company, can be considered a government entity.

A government official is any employee, officer, director, agent, consultant, or board member of any agency or branch of

- national
- regional
- provincial
- state or
- local government

whether legislative, executive, or judicial, or any person acting in an official capacity on behalf of a government entity and the family members of any of the aforementioned individuals.

Example: We want to do business with a government entity. Our reseller approaches us and asks us to share expenses associated with doing business with government agencies in that country. It is clear from the context of the request that funds advanced by Akamai would be paid to government officials and/or intermediaries to influence their decision to choose Akamai services. This is illegal wherever we do business and thus would be prohibited under the Code.

Example: You are a direct sales rep who has been trying to sign up a potentially valuable government agency as an Akamai customer. Without checking with Akamai's Global Compliance Department, you invite one of the agency's principal decision-makers to a US\$25 lunch to learn more about the agency's business needs and better explain what Akamai does. Such a lunch may violate that particular agency's ethics requirements and thus potentially subject the official and/or Akamai to civil and criminal sanctions, loss of business opportunities, and public embarrassment.

If you're not sure, [Ask Compliance](#) on Aloha Community

Read our [Anti-Bribery & Anti-Corruption Policy](#) for additional details on dealing with government agencies and officials. This policy has specific guidance about making charitable or political contributions that could violate anti-corruption laws.

CONFLICTS OF INTEREST



A “conflict of interest” occurs when your personal interests interfere, or appear to interfere, with the interests of Akamai. You must always avoid conflicts of interest because they impair your ability to make decisions that are solely in our best interests, and they damage the trust among you, Akamai, our business partners, and the public.

We expect you to act in the best interests of Akamai and refrain from entering into any business, financial, or other relationship with our existing or potential customers, competitors, or suppliers that might impair, or appear to impair, the exercise of your judgment for Akamai. Similarly, you may not make a business decision on behalf of Akamai that is, or could be construed to be, motivated by personal gain.

Pre-Approval Requirement When You Have a Personal Interest

Before committing yourself or Akamai to any transaction or relationship where you have a personal interest that could create the appearance of a conflict of interest, it is your responsibility to:

- Disclose the situation to Global Compliance
- Receive approval to proceed from both your manager and Global Compliance (after they determine that the transaction or relationship is in Akamai’s best interests)

Guidance on Common Situations

Doing Akamai Business with Family Members or Friends

If you are recommending that Akamai conduct business with a family member or friend of yours, or with a business in which they play any significant role (such as an executive or decision-maker in connection with an Akamai-related transaction), stop!

Example: You want to make a small investment in a start-up that is related to network infrastructure but not in an area that Akamai is currently pursuing. Is that okay?

Yes, for now. You’ll need to keep an eye on where the business goes and if it starts to converge with Akamai’s operations. In that case, you may need to stop being involved with the start up.

Need pre-approval?

Fill out this form.

You must disclose your relationship to your manager and Global Compliance and allow them to make the final decision whether it is appropriate to proceed. Akamai construes a “family member” very broadly to include your:

- spouse / partner
- boyfriend / girlfriend
- parents
- children / grandchildren
- siblings
- in-laws
- aunts / uncles, cousins, spouses of such relatives
- any adoptive and step relationships

Examples of people we classify as “friends” include:

- social acquaintances
- classmates
- housemates

Outside Employment

It is a conflict of interest to engage in any business outside of Akamai (including serving as an officer, director, partner, or consultant) if it could interfere with your performance at Akamai or require you to use Akamai’s confidential information, property, or systems. **Working for, or providing services to, an actual or potential competitor, customer, or supplier of the Company raises the greatest concerns about a possible conflict of interest.** However, other situations exist where a less obvious conflict of interest may be present.

Before you start to work on or with an outside business, you must first obtain the written approval of your manager and Global Compliance or Akamai’s Chief Human Resources Officer or his/her delegate. You should initiate the process by contacting your HR business partner or Global Compliance (ethics@akamai.com).

Use of Position for Personal Benefit

It is against the Code to exploit, or appear to exploit, your position with Akamai for your own personal profit or gain (other than your compensation paid by the Company), or for the profit or gain of any family member or person with whom you have a personal relationship.

Example: Your sister, a sales rep for a telecoms company, suggests that Akamai work with her to put in place a network deal.

It would not be appropriate for you to decide whether we should enter into the deal or to personally negotiate the terms of such a deal with her company. Instead, you should bring the opportunity to your manager’s attention so that an impartial member of the team can evaluate it.

Example: You have been asked to write a fiction novel, unrelated to your role at Akamai.

You would only be allowed to accept the book contract if it does not interfere with your duties at Akamai, and after obtaining the approval of your manager, and Global Compliance or HR.

Example: You work with an Akamai customer to develop an app used to select the winners in an online contest.

You may not use your knowledge of how the app works to win the contest for yourself or your friends or family members.

It is against the Code for you to accept any payment, opportunity, or other benefit on terms or conditions more favorable than those generally available to the public and that are made available because of your position at Akamai. While broad-based discount programs available to all Akamai employees are not prohibited, attempts to take advantage of your knowledge of Akamai or your position here to request or receive special benefits from a vendor or customer are not permitted.

Similar issues can arise if you become aware of a business opportunity in the course of your employment at Akamai that relates to our business. You may not take advantage of those opportunities without the specific prior approval of Global Compliance, which will evaluate whether the company should first pursue it.

Investments

Insider Trading

You may not buy or sell Akamai securities (stock, bonds, options) or encourage others to do so if you have material, non-public information about Akamai, even if you do not use such information as a basis for such trade and even if you have not been notified that you are “blackout.”

Doing so would violate both the Code and the Law. Please refer to the Policy on Trading in Akamai Securities for a detailed discussion of your obligations in this area.

It is a conflict of interest if you use Akamai's, suppliers, or contractors in a personal capacity and do not pay market value for the product or service received.

Example: You know our quarterly revenue estimate has changed materially or that we are about to acquire a sizable company.

You may not trade in Akamai securities until the beginning of the second business day after the public announcement of the information about such change has been publicly disseminated, regardless of whether you have been notified that you are “blackout”.

Investment in a Business Outside of Akamai.

An investment that benefits you or a family member in an entity that does business with Akamai violates the Code if the investment compromises, or appears to compromise, your responsibilities to Akamai, including creating, or appearing to create, a conflict of interest. In particular, an investment in a startup or other private company that could be considered an Akamai competitor raises concerns, particularly where you may be providing advice or participating in its business decision. Before making an investment in a company that could involve circumstances like these, contact the Legal Department for guidance.

Factors to consider when determining whether a conflict of interest exists with an outside business investment include:

- the extent to which your position with Akamai brings you in contact with the other company
- the amount of the investment or expected return
- the nature of the company's business
- the type of relationship the company has with Akamai

As a general guideline, an investment in less than one percent of the outstanding stock of a company where you are not involved in advising the company or participating in its business decisions generally is permissible.

Example: Your best friend from university who is running a startup streaming company recognizes that you won't be able to serve on its Board of Directors; instead, he asks you to invest in the company. This would be a conflict of interest and not allowed.

POLITICAL AND CHARITABLE CONTRIBUTIONS



Political and charitable contributions can be problematic under the Code and various Laws if the contribution is intended to improperly influence a government official or an employee or representative of a private company.

Akamai respects your right to actively support the political parties and candidates of your choice, but campaign work and fund raising must be done on your own time. **If a planned personal political contribution or public statement could in any way be perceived as involving Company funds, property, or services, consult with Global Compliance prior to making the contribution or statement.**

You may not, except with prior approval from Akamai's Chief Financial Officer and General Counsel, make any political contribution, either monetary or in-kind, on behalf of Akamai or use Akamai's name, funds, property, equipment, or services for the support of any political party, initiative, committee, or candidate.

If you receive a request to make a charitable donation to something connected with an Akamai client, supplier, or prospect, you will need to get pre-approval via **this form**. Global Compliance will work with you to determine who benefits from the charity and whether it has adequate transparency and procedures to prevent inappropriate diversion of contributions and whether making a gift is consistent with the Code.

Example: A political candidate asks to use an Akamai conference room after hours for a fundraiser or meet and greet before an election. This constitutes a political contribution unless the candidate pays the commercially reasonable rate for the room.

PROTECTION AND PROPER USE OF AKAMAI PROPERTY

You have a responsibility to protect and preserve our property, to use it appropriately and to prevent its theft or waste.

The services, software and products that Akamai offers may only be used for legitimate business purposes and not for your personal benefit or the personal benefit of others.

Company property, such as computers, office supplies, and printers, should be used to further Akamai's legitimate business objectives and primarily for our business. To the extent that our property is used for occasional personal use, it should not interfere with our business or the performance of your responsibilities for Akamai.

Examples of prohibited conduct include, but are not limited to:

- Taking office supplies or equipment home for personal use
 - Using Akamai-leased corporate housing for a personal stay
 - Downloading porn, even after business hours
 - Downloading illegal copies of films, TV shows, music
 - Creating or forwarding an email containing offensive jokes to fellow employees or others outside Akamai.
-

PROTECTING CONFIDENTIAL INFORMATION



Preserving the Confidentiality of Our Information

Our continued success depends on our ability to protect our confidential and proprietary information including our intellectual property, which is our most valuable asset. This includes all non-public information that might be of use to our competitors or harmful to us or to our customers if disclosed.

Only disclose our confidential information to others within Akamai who need to know such information. Outside of Akamai, be aware of inadvertent disclosure. Do not have conversations about our confidential information in public areas such as elevators, trains, or airplanes, where such conversations can be overheard. Be careful when talking about Akamai on social media - please refer to our Social Media Policy.

You may sometimes need to disclose our Confidential Information to potential customers or business partners. In that case, you should first contact the Legal Department to ensure that an appropriate written nondisclosure agreement is signed by all necessary parties before any such disclosure occurs. **You should never sign a third party's nondisclosure agreement before the Legal Department approves the agreement.**

Preserving the Confidentiality of Others' Information Entrusted to Us

Almost all nondisclosure agreements executed by Akamai are mutual in nature. This means **you must protect the confidential information of our partners, suppliers, contractors, competitors and customers that is exchanged under such an agreement in the same manner as you are required to protect our Confidential Information.** If you have access to confidential information about any of our partners, suppliers, contractors, competitors, and customers as part of your job, you must check with the Legal Department and use it solely for legitimate business purposes and as permitted by any applicable Law, agreement, and the Code.

Do not leave documents containing Akamai Confidential Information where unauthorized individuals can read or obtain them.

Questions about NDAs?
[Ask Legal on Aloha Community](#)

If you accidentally disclose such information, you must contact the Legal Department immediately.

ACCURACY OF BOOKS, RECORDS AND PUBLIC REPORTS

Our reputation and our ability to meet our legal obligations are dependent upon the integrity of our business practices, including our internal record keeping and external reporting systems. Therefore, **it is critical that you make every effort to report and record accurately and completely all transactions, assets and liabilities in accordance with our policies and procedures and applicable legal and accounting requirements.** You should use good judgment and common sense when preparing any Company document to ensure that it objectively and accurately reflects the facts of the situation. Reports or records should not be used to mislead those who receive them or conceal anything that is improper.

Expense reports should only include appropriate business-related expenses. Similarly, to the extent that you are compensated on an hourly basis, you must accurately report the time worked.

Examples of prohibited conduct include, but are not limited to:

- Submitting information that will be used in the Company's financial statements, books, or records that intentionally hides or disguises the true nature or timing of any transaction
- Failing to record a required entry in a timely manner
- Failing to provide supporting documentation for purchases or commitments
- Attaching falsified or inaccurate receipts to an expense report
- Interfering with an audit or investigation by destroying or tampering with documents

As a publicly traded company, Akamai is under a legal obligation to provide full, fair, accurate, and timely disclosure in reports and documents filed with, or submitted to, regulatory agencies and in other public communications. If we fail to do so, not only will our business suffer, but we could also face possible civil and criminal penalties that could extend to you.

Example: You receive an email from a customer cancelling their service but do not forward it to Finance for processing until a month when the lost monthly recurring revenue will not be as problematic.

Your actions would violate the Code and could call into question the accuracy and integrity of Akamai's reported result and potentially subject you and/or Akamai to legal liability.

For more guidance, please refer to the [T&E policy](#).

COMPLIANCE WITH LAWS

Akamai conducts business around the world and, as a result, is subject to local, national, and international laws, rules and regulations (“Laws”). **You are required to be generally familiar with the Laws that apply to your responsibilities at Akamai and to comply with all applicable Laws wherever Akamai does business.** Similarly, if you are advised by Global Compliance or the Legal Department not to take an action that would constitute a violation of a Law, or to take action that is required by a Law, you are expected to follow that advice.

A specific area to be mindful of is antitrust laws, also known as competition law. The main purpose of these Laws is to **preserve competition by prohibiting arrangements or actions that could unreasonably restrain the functioning of a free and competitive marketplace, including using a dominant market position to drive, or try to drive, a competitor out of business or to artificially increase prices.**

Before engaging in any of the following types of activities, even if verbal, you should consult with the Legal Department:

- Discussing, setting, or agreeing to influence prices with a competitor of Akamai (you should also avoid any meeting or communication with a competitor without a lawyer present where there is the possibility that prices, discounts, or other business terms could be discussed)
- Any discussions that may appear to involve the coercion of a customer to purchase products or services that they do not require/desire by tying the unwanted purchase to the contemplated transaction
- Agreeing with a competitor to divide customers, territories, or markets or to boycott suppliers or customers

In particular, you must comply with the U.S. Foreign Corrupt Practices Act, the U.K. Anti-Bribery Act and other anti-corruption laws that apply in areas where we do business.

Questions about this?

[Ask Legal on Aloha Community](#)

Be mindful of your spoken and written communication which if taken out of context, could create an impression of anti-competitive practices.

AMENDMENTS AND WAIVERS OF THIS CODE



Akamai reserves the right to amend or revise this Code at any time but won't do so without the approval of a majority of the Board and/or of an appropriate committee thereof. Certain changes and supplements may be made to the Code to comply with local jurisdictional regulatory requirements; such modifications shall apply only to those employees of Akamai employed in those jurisdictions.

We will grant a waiver of this Code only in exceptional circumstances. The General Counsel shall be responsible for maintaining a complete record and approving any exception or waiver of the Code.

A majority of disinterested directors, or of the appropriate committee of Akamai's Board of Directors, must approve a waiver for any director or executive officer.

Contact ethics@akamai.com if you believe that a waiver of the Code is warranted in a particular situation.

IDENTIFYING AND RAISING CONCERNS



We all have a responsibility to help maintain Akamai's values and protect our reputation so that our actions don't compromise our future successes. Although it can take courage to raise an ethical issue, we expect you to come forward if you have information about activities or behavior that conflicts with, or could be perceived as conflicting with, this Code or any Law, rule, or regulation, whether by Akamai, its employees, officers, directors, or any third party doing business on behalf of Akamai. It is your responsibility to promptly report the matter to the Company.

If you do not feel that the matter has been adequately resolved by Akamai, nothing in this Code should prevent you from reporting any illegal activity, including any violation of the securities Laws, antitrust Laws, or any other local, national, or international Law, rule, or regulation, to Akamai's Audit Committee or to the appropriate regulatory authority.

How do I identify an ethics issue?

Some types of ethical issues are easy to recognize, but some may be more difficult to identify.

When in doubt, [Ask Compliance](#) on Aloha Community.

We are here to help provide guidance and to address problems that may arise.

If you request so, your identity will remain confidential, unless required to ensure compliance with the Code, to carry out an effective investigation, or if required by Law.

Questions about this?

[Ask Legal on Aloha Community](#)

Watch for these signs that there may be an ethical issue involved:

- You feel uncomfortable about a decision or something you've been asked to do
 - You saw a situation that made you or someone else feel uncomfortable
 - You feel Akamai would be embarrassed if the situation became public.
-

With whom should I raise an ethics issue?

Global Compliance - as an independent avenue, whether in the form of the Chief Compliance Officer or Global Compliance Department, generally - should be your first port of call for all ethics related issues. That team can be contacted via their [Ask Compliance](#) page on Aloha Community as well as at ethics@akamai.com. All questions which flow to those two avenues **will always be treated confidentially**.

Furthermore, you should refer to the following table if you prefer to raise an ethics issue via a different channel:

TYPE OF ISSUES	PERSON TO CONTACT
General question, concern or issue	<ul style="list-style-type: none"> • Your supervisor or • The Legal Department
Ethical concerns about your supervisor	<ul style="list-style-type: none"> • The Legal Department or • Your HR Business Partner
Ethical concerns about the Chief Human Resources Officer	<ul style="list-style-type: none"> • General Counsel or • Chief Executive Officer
Ethical concerns about the General Counsel	<ul style="list-style-type: none"> • Chief Executive Officer and/or • Chairman of the Audit Committee of our Board of Directors
Ethical concerns about the Internal Audit function	<ul style="list-style-type: none"> • General Counsel or • Chief Human Resources Officer
Ethical concerns about an executive officer or member of the Board of Directors	<ul style="list-style-type: none"> • General Counsel or • Chief Executive Officer or • Director of Internal Audit and/or • Chairman of the Audit Committee of our Board of Directors
Concerns regarding questionable auditing or accounting matters or complaints regarding accounting, internal accounting controls or auditing matters	<ul style="list-style-type: none"> • General Counsel or • Chief Executive Officer or • Director of Internal Audit and/or • Chairman of the Audit Committee of our Board of Directors

How do I raise an ethics concern?

The easiest way to raise an ethics concern is to send an email to ethics@akamai.com.

That team will treat your concern confidentially and will also escalate any concerns you have about senior management to the right place (e.g., an allegation about the General Counsel won't be investigated by the General Counsel).

What if someone brings a concern to me?

If you receive a question about an ethics issue or someone brings an allegation of improper conduct to your attention, you should listen carefully and then discuss the matter with your manager and contact Global Compliance at ethics@akamai.com. Any manager who receives information about a possible Code violation has a responsibility immediately to discuss the issue with Global Compliance.

Fairness

When matters require investigation, we are committed to conducting an impartial process that is fair to all involved and allows for each person to speak openly and honestly about the issue. Investigations will not be conducted by individuals who have been accused of wrongdoing.

No retaliation

No employee who, in good faith, reports ethical or legal issues, questionable practices, or irregularities to management, or who cooperates in an investigation of the same, will be discharged, demoted, suspended, threatened, harassed, or in any other manner discriminated against in the terms and conditions of his/her employment because of the making of such a report or providing such cooperation, unless it is determined that the false information was knowingly provided by such employee.

If you are not comfortable using ethics@akamai.com or want to remain anonymous, you can call the Network, an independent third party, at (877) 888-0002 or +1 (770) 810-1147 (if you are calling from outside the U.S.).

There is also a confidential [web form](#) you can submit.

For more information about our process, please [see the overview here](#).

[Click here to acknowledge that you have read and understood the Akamai Code of Ethics](#)