

Modern Slavery and Human Trafficking Statement for FY2020

May 2021



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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 2020.

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 46 subsidiaries (hereinafter collectively referred to as “**Akamai**”) and has offices in 70 locations globally¹. Akamai provides solutions to secure and deliver content and applications via the Internet.

As of December 31, 2020, we had 8,368 employees worldwide, located in more than 30 countries and representing over 85 nationalities, which brings a diverse, inclusive, and global perspective to our operations. Around 1.1% and 2.3% 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 not tolerate discrimination on the basis of gender, gender identity, sexual orientation, race or ethnicity, protected veteran status, disability or other protected group status.

Akamai supports varied programs and practices designed to promote a diverse and inclusive working environment. We have a demonstrated history of investing in our workforce by offering competitive salaries, wages, and benefits. Our compensation and benefits philosophy is to maximize the effectiveness of pay and benefits programs to attract and retain the high-caliber individuals needed to drive the success of our business, while balancing cost-effectiveness and competitive factors.

¹ A complete list of Akamai affiliates and offices is available at <https://www.akamai.com/us/en/about/akamai-affiliates.jsp> and <https://www.akamai.com/us/en/locations.jsp>

Akamai Operations

Akamai provides solutions for securing and delivering content and business applications over the internet. At the core of our solutions is our globally distributed Akamai Intelligent Edge Platform, which is designed to help our customers leverage the power and reach of the internet while protecting them from malicious threats to their business. We deploy servers and technology at the “edge” of the internet – establishing touch points in networks around the world. Leveraging our position at the edge, we offer our customers solutions designed to protect them from threats and attacks, while empowering them to securely deliver their business as they engage, entertain and interact with their customers; extend their internal systems beyond their corporate perimeters to control access and better leverage the cloud; and help them compete and operate with the scale, resilience and security that businesses demand.

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, Microsoft, 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 2020, Akamai engaged with more than 3800 suppliers from 24 countries globally. In Australia, we engaged with 68 suppliers (from 5 countries). In the UK, we engaged with 179 suppliers (from 5 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.

This year, Akamai established a Responsible Supply Chain Program to strengthen existing efforts to engage with our suppliers and vendors, and help ensure that they operate in a manner that is consistent with Akamai's values and policies, including those concerning modern slavery.

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 Responsible Supply Chain Program, 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 be subject to disciplinary action up to and including termination of employment– 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.

Next Steps

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 will play a crucial role in helping Akamai serve as a catalyst for positive, systemic change and positive impact for our customers, investors, employees, and communities.

The ESG Office will be undertaking a comprehensive materiality assessment and gap analysis that includes benchmarking against peer companies, identifying and reviewing key ESG rankings and indexes, reviewing emerging ESG and modern slavery standards and regulations, and validating its findings with external parties and advisors to develop a company-wide strategy for establishing and strengthening procedures for ongoing assessment, improvement, and communication.

Akamai's Responsible Supply Chain Program will also establish procedures by year-end 2021 that include:

- requiring all new suppliers to complete an onboarding questionnaire that incorporates questions on modern slavery / human trafficking, environmental sustainability, diversity and inclusion, sanctions and embargoes, anti-bribery, and other issues to enable risk assessment and informed decision-making around the suppliers and vendors that Akamai works with;
- conducting periodic reviews or audits with key suppliers (such as our server suppliers) to ensure compliance with, amongst others, Akamai's [Code of Ethics](#), [Human Rights Policy](#) and [Supplier & Partner Guiding Principles](#).

Signatures

This 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).



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