



AKAMAI PARTNER CODE OF CONDUCT

At Akamai, we are committed to operating with the highest standards of excellence, integrity, and fairness in all aspects of our business. Our core values guide us in every decision we make, from interactions with customers to relationships with the third parties that represent us.

This Partner Code of Conduct (“CoC”) reflects our commitment to ethical business practices and applies to all Akamai channel partners, resellers, distributors, system integrators, subresellers, consultants, agents, referral partners, subcontractors, intermediaries, and any third party that acts on behalf of or represents Akamai before customers, prospects, public entities or other third parties or markets, sells, delivers, refers or otherwise facilitates the provision of Akamai products and services (“Partners”).

As used in this CoC, “Akamai” means Akamai Technologies, Inc., and all of its wholly owned and operated global affiliates.



Commitment to Compliance

All Partners must comply with this CoC, Akamai’s policies, and applicable laws in the jurisdictions where they operate. Partners must uphold high ethical, human rights, and environmental standards.

While we respect cultural differences, Partners must align with this CoC and immediately disclose and remedy any deviations.

Who Is Covered?

This CoC applies to all individuals and entities acting as Akamai’s Partners as defined above, including their employees, affiliates, subcontractors, representatives, and anyone acting under their direction or control.

Ethical Business Practices

Anti-Corruption and FCPA-Specific Requirements

Akamai strictly prohibits bribery and corruption in any form. Partners must not, directly or indirectly, offer, promise, authorize, give or accept bribes, kickbacks, or anything of value intended to gain an improper advantage or influence decisions. This includes interactions with both public officials and private sector individuals.



All Partners must ensure their actions comply with the U.S. Foreign Corrupt Practices Act (FCPA), the UK Bribery Act, and all other applicable anti-corruption laws worldwide. This includes, but is not limited to:

- No facilitation payments, even if such payments are customary in a jurisdiction.
- No payments, gifts, or offers of value to obtain or retain business or gain an improper advantage, whether to or from any private party or any government official, political party, candidate for public office or employee of a State-Owned Enterprise.
- No use of intermediaries, referral partners, consultants, sub-agents, subcontractors to indirectly engage in prohibited conduct or via schemes designed to circumvent applicable law or this CoC.

Accurate Recordkeeping

Partners must keep accurate books and records that reflect all transactions truthfully. False entries, off-the-book payments or funds, unrecorded accounts, or disguised expenses are strictly prohibited. All payments must be transparent, properly documented, and made only pursuant to a valid invoice that clearly describes the lawful purpose of the payment. Records must be retained in accordance with applicable legal and regulatory requirements and made available to Akamai upon reasonable request.

Anti-Corruption Due Diligence

Akamai may conduct due diligence reviews on all Partners prior to and at any time during the term of the business relationship with Akamai.

Partners must cooperate with Akamai in due diligence activities, including providing accurate and timely responses to compliance questionnaires, certifications, audits, and requests for supporting documentation.

Gifts, Meals, and Entertainment

Gifts or entertainment must be modest, infrequent, and must not be intended to influence business decisions or create a perception of impropriety.

Any gifts, meals, or entertainment offered to government officials, whether directly or indirectly, are generally prohibited unless expressly approved in writing in advance by Akamai.

Partners are responsible for ensuring that any such expenses are transparent, properly recorded, and compliant with all applicable laws and Akamai policies.

Conflicts of Interest

Partners must avoid situations that could create or appear to create a conflict of interest with Akamai. Any potential conflict must be disclosed immediately.

Disclosure of Government Affiliations

Partners must disclose to Akamai if any of their owners, officers, directors, or key employees are current or former government officials, or if any government official has any direct or indirect financial interest in the Partner entity. Such relationships require Akamai's prior review and approval. Partners must ensure that this information remains current and accurate throughout the duration of their business relationship with Akamai and promptly update Akamai if any changes occur.

Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF)

Partners must not engage in or facilitate money laundering, terrorism financing, cartel activity or any other activity involving proceeds of criminal conduct. Partners must perform reasonable due diligence on counterparties and immediately report any suspicious activity related to transactions with or on behalf of Akamai.



Fair Competition, Trade Compliance, Human Rights and Environmental Responsibility

Antitrust and Competition Laws

Partners must compete fairly and comply with all applicable antitrust and competition laws. This includes avoiding any conduct that may restrict fair competition or constitute collusion with competitors.

Prohibited practices include, but are not limited to:

- Price fixing or coordination of prices with competitor.
- Bid rigging or manipulation of tenders.
- Allocation of markets, customers, or territories.
- Agreements to boycott certain customers or suppliers.
- Improper exchanges of competitive information, such as pricing, costs, or sales strategies.
- Favor sales or improperly disadvantage competitors in a manner that unduly restricts or limits competition.

Sanctions and Export Control Requirements

Partners must not engage in any business involving Akamai products or services that would violate or that would cause Akamai to violate applicable economic sanctions or export control laws and regulations, including those administered by the U.S. Office of Foreign Assets Control (OFAC), the Bureau of Industry and Security (BIS), or other relevant authorities and the U.S. Export Administration Regulations (EAR), the International Traffic in Arms

Regulations (ITAR), and relevant regulations of other jurisdictions. This includes, but is not limited to transactions directly or indirectly involving:

- Individuals, entities, or organizations listed on sanctions or denied party lists (e.g., SDN List, Entity List).
- Sanctioned jurisdictions.
- Companies owned, controlled by, or acting on behalf of sanctioned parties.

Partners are responsible for maintaining appropriate screening processes designed to ensure compliance and prevent such violations. Technical data subject to export controls must be safeguarded through appropriate physical, electronic, and administrative measures.

Sanctions Screening Obligations

Partners must screen all counterparties, end users, and transactions associated with Akamai products or services against current sanctions lists before any transaction occurs and must re-screen periodically as required by law or Akamai.

Labor and Human Rights

Partners must uphold internationally recognized human rights and ensure that all workers, i.e. employees, contractors, and temporary personnel, are treated with dignity and respect.

At a minimum, Partners are expected to:

- Prohibit forced, bonded, or involuntary labor, including human trafficking and restrictions on workers' freedom of movement.
- Prohibit child labor and comply with all minimum-age laws and hazardous-work restrictions.
- Provide fair and safe working conditions, including a workplace free from discrimination and harassment.
- Ensure freely chosen employment, allowing workers to resign with reasonable notice and without penalty.
- Follow all applicable laws on wages, hours, benefits, and legally mandated leave.
- Allow lawful freedom of association and collective bargaining.

Health, Safety, and Well-Being

Partners must maintain a safe and healthy working environment. This includes identifying and mitigating workplace hazards, providing appropriate training and protective equipment, and preparing for emergencies.

Environmental Responsibility

Partners are expected to conduct their operations in an environmentally responsible manner and to comply with all applicable environmental laws and regulations.

Notification Obligations

If a Partner becomes aware of any actual or potential violation related to its work with Akamai, it must notify Akamai immediately.



Data Privacy, Confidentiality, and Intellectual Property

Privacy

Partners must handle personal data responsibly and comply with applicable data protection laws as well as any data processing agreements pertaining to Akamai products and services to which it is a party. Akamai's applicable data protection principles and other resources are available at [Privacy Trust Center - Compliance](#).

Confidentiality

Non-public and/or proprietary information shared by Akamai must be kept confidential unless explicitly authorized in writing. Partners must take care to prevent inadvertent disclosures.

Intellectual Property

Partners must respect and protect Akamai's intellectual property and not use Akamai-provided data to train, fine-tune, or otherwise develop artificial intelligence or machine learning models without prior written consent.

Cooperation; Audits and Investigations

Partners must cooperate fully with any compliance inquiry, audit, or investigation initiated by Akamai or a competent authority, including by providing access to relevant personnel, documents, records, and facilities, and must not obstruct or mislead investigators. Partners shall permit Akamai, or an independent third party acting on Akamai's behalf, to conduct periodic audits or assessments of the Partner's books, records, internal controls, and compliance program to verify adherence to this CoC.





Internal Controls

Partners must implement and maintain internal controls reasonably designed to comply with this CoC and to prevent and detect corruption, including conducting due diligence on subcontractors, representatives, or any third parties engaged in furtherance of Akamai business.

Proper Use of Funds

Partners must ensure that any funds, discounts, incentives, or benefits provided by Akamai are used only for their intended and legitimate purposes. Under no circumstances may these be diverted to improperly influence any third party or secure an improper advantage.



Reporting Concerns

Partners must maintain a process to report concerns or violations confidentially and protect whistleblowers from retaliation.

Violations or concerns can be reported via Akamai's Ethics Hotline: www.akamai.ethicspoint.com. Reporters to the Hotline may choose to remain anonymous if they wish to.

Partners are expected to inform their own employees and affiliates about the availability of the Akamai Ethics Hotline and encourage its use when necessary.

When in doubt about the right course of action, Partners are encouraged to seek guidance from their Akamai contact or through Akamai's Ethics Hotline.

Non-Retaliation Commitment

Partners must not retaliate or permit retaliation against anyone who raises a concern in good faith, whether through Akamai's Ethics Hotline or other appropriate channels. Partners are expected to ensure their own reporting systems reflect this principle.





Consequences of Non-Compliance

Failure to comply with this CoC may result in immediate corrective action, up to and including termination of the business relationship. Akamai reserves the right to suspend payments, current or future orders, benefits, or access to its systems and resources for Partner and its clients, pending investigation of any suspected violation. Failure to comply with this CoC may further result in a requirement that the Partner refund commissions, rebates, discounts or other compensation received in connection with the non-compliant activity.

Akamai also reserves the right to report violations of law to appropriate governmental or regulatory authorities and to pursue all other rights and remedies available to it.

Implementation, Training and Acknowledgment

Partners are responsible for cascading this CoC to their employees and representatives and for implementing appropriate compliance training programs to ensure understanding and adherence to this CoC. Such training must include periodic refresher sessions on key topics, including anti-corruption, sanctions compliance, and data protection. Akamai may request documentation of these trainings at any time.



By doing business with Akamai, the Partner acknowledges and agrees to uphold the standards in this CoC. This CoC is an integral part of the agreement between Akamai and its Partners.

Certifications

Akamai may require periodic certifications from Partners affirming their compliance with this CoC.