Code of Ethics

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Dear Colleagues:

Everyone at Akamai shares an enormous sense of pride in all that we have 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 and secure a significant portion of the world's Web traffic 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 established the following Core Values to guide our business decisions:

- **Customer First**: We put our customers at the forefront of everything we do. Their success is our success.
- **One Akamai**: We achieve success through the cooperative exchange of skills and ideas. Through collaboration, we strive for win-win solutions that best serve our teams and our customers.
- **Innovation**: We constantly challenge ourselves to create new products that deliver real customer value. We continuously find creative ways to solve problems and achieve results. Our technology leadership is unparalleled in the industry, and we are motivated to stay in the lead.
- **Urgency & Persistence**: Like our co-founder, Danny Lewin, we always act with a sense of urgency to solve the hardest problems. Even in the face of the biggest obstacles, we persevere with the courage and fortitude to find solutions.
- **Integrity & Trust**: We conduct our business with the highest degree of ethics, honesty, and transparency. We are committed to earning the trust and confidence of our colleagues and customers, and we always aim to act for the absolute good of the whole.
- **Inclusion**: We consistently treat one another with respect and dignity, while valuing and celebrating diversity of thoughts, ideas, and solutions. We provide opportunities for our people to grow, flourish, and achieve great things.
- **Giving Back**: We provide active support and meaningful enrichment to the communities in which we live and work.

Our Code of Ethics reflects these values, and we expect every employee, director, contractor, and partner to live up to our Core Values and comply with this Code, Akamai's policies, and applicable laws and regulations. Not only is this the right thing to do, it is vital to ensuring our future success.

Tom Leighton
Chief Executive Officer and Co-Founder

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Executive Vice President, General Counsel & Corporate Secretary

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Chief Ethics & Compliance Officer

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INTRODUCTION

Why 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, and we depend on you to help us do so. Our Code of Ethics provides guidance on how to carry out our day to day business activities in accordance with our culture and our values, as well as guidance on how to comply with the letter and the spirit of all applicable laws.

We should always deal honestly, ethically and fairly with our customers, suppliers, partners, competitors, and each other. You must not take unfair advantage of another employee, individual, or company through manipulation, concealment, misuse of confidential information, lying, or other improper dealing. You should never represent Akamai in a manner that violates the trust of the Company or embarrasses us, our customers, shareholders, or other team members.

As a U.S. company with shares traded on a public stock exchange, Akamai must comply with all laws applicable to U.S. public companies. Because we operate globally and have employees and customers all over the world, we must also comply with applicable laws in other jurisdictions – essentially anywhere we conduct business. Our Code establishes a global standard and framework for upholding our values and complying with applicable law. Though we respect differences in culture and business practices, if a local custom violates the Code, we must follow the Code.

While the Code covers a broad range of principles and activities, it cannot address every possible situation. It is up to you to use good judgment and to seek guidance when you are not sure of the right course of action – by discussing with your manager, at Ask Compliance on Aloha Community, or by emailing compliance@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 inappropriate behavior, including unlawful harassment and discrimination. Abusive, harassing, or offensive conduct is unacceptable and will not be tolerated.

Before taking action, consider how your action could be perceived:

- Is the action consistent with Akamai's Core Values?
- Is it consistent with the spirit of the Code of Ethics?
- Could the action create even the appearance of impropriety or embarrass the Company?

When making employment decisions such as hiring, training, compensation, promotion, or disciplinary action, Akamai does not discriminate on the basis of an individual's race, color, gender, sex, religious belief, national origin, sexual orientation, 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 applicable laws where we work.

Who is Covered?

Our Code of Ethics applies to everyone at Akamai – all of our employees, directors, officers, executives, and contractors.

We also expect our contingent workers, partners, agents, and all others acting on behalf of Akamai to hold themselves to the same high standards in our Code.

Everyone is expected to demonstrate commitment to the Code. We require new employees to sign and acknowledge the Code as part of our onboarding process. All employees are thereafter required to complete annual training and certify acceptance of the Code.

Expectations of Managers

Managers and leaders are entrusted with setting an example for their teams and demonstrating Akamai's commitment to acting with integrity and conducting business in accordance with our Core Values.

If you are a manager or in a leadership position, it is not enough for you alone to behave legally and ethically. You have a responsibility to set the tone for your teams and take affirmative steps including a visible commitment to acting with integrity and promoting ethical behavior. You should:

- complete your own compliance training in a timely manner and encourage your team to do the same;
- become familiar with the Code and Akamai's other policies that apply to your team;
- provide appropriate supervision, feedback, and guidance to ensure compliance with the Code; and
- create an environment where team members are comfortable raising questions or concerns without fear of reprisal.

We expect managers and leaders to be positive role models for their teams. Your actions should demonstrate that achieving business goals should never be done at the expense of our ethical values and compliance with the law.

Consequences for Violating the Code

If it is determined that you have violated the Code or any law, rule, or regulation, Akamai may take disciplinary action that it deems appropriate depending on the circumstances – ranging from a warning to termination or referral for criminal prosecution. Any manager who has knowledge of a

suspected or actual violation and fails to report it to the Company may also be subject to disciplinary action.

Asking Questions and Identifying and Raising Concerns

All of us have a responsibility to help maintain Akamai's values and protect our reputation so that our actions do not compromise our future success.

The Code isn't something you read once. It is a guide to putting Akamai's values into action. If you find yourself considering a course of action that may be contrary to our ethical values or applicable laws, consult the Code.

If you have any questions about interpreting or applying the guidance set out in our Code, it is your responsibility to consult your manager, your HR business partner (Ask HR), our Legal Department (Ask Legal), or the Ethics & Compliance team (Ask Compliance).

If you suspect that someone is behaving illegally or unethically, please **speak up.** If someone asks you to do something that you believe is inconsistent with our Code, please **speak up**.

Though it takes courage to raise a concern, you are expected to come forward if you have information about activities or behavior that conflicts with, or could be perceived as conflicting with, our Code or any law, rule, or regulation – whether by Akamai or its employees, officers, directors, or any third party doing business on behalf of Akamai. As an Akamai team member, it is your responsibility to promptly report the matter.

How do I identify an ethics issue?

Some ethical issues are easy to recognize; others may be more difficult to identify. When in doubt, Ask Compliance on Aloha Community or email compliance@akamai.com. The Ethics & Compliance team is available to provide guidance, answer questions, or address concerns that may arise.

The easiest way to ask a question about a commonplace concern is via **Ask Compliance** on Aloha Community.

Would you rather pose your question more discreetly? Email compliance@akamai.com

Speaking up about a concern when you witness something that may be improper enables Akamai to address the issue proactively, learn more about the potentially improper conduct, and avoid the likelihood of serious legal or reputational harm.

How and with Whom do I Raise an Ethics Concern?

Here are four common ways to raise a concern:

1. **Ask Compliance** on Aloha Community: For questions that may be of common interest and broadly applicable to others and where it is not necessary to keep your identity confidential.

2. Email Compliance: Our Chief Ethics & Compliance Officer and all other team members are available at compliance@akamai.com. All concerns raised via email will **be treated confidentially** unless disclosure is required to ensure compliance with the Code, to carry out an effective investigation, or if required by applicable law.

3. Utilize our Ethics Hotline: All submissions or calls to the Ethics Hotline are free of charge and your identity will remain anonymous. The Ethics Hotline is hosted by an independent third party and is available:
    a. Online at: www.akamai.ethicspoint.com
    b. By phone from any of our global locations at the phone numbers appearing in **Appendix B** (p. 30).

4. Escalate internally: If you wish to raise a concern through management or through other avenues, please consult the table appearing in **Appendix A** (p.29).

Be alert to the possibility that there is an ethical issue to consider if:

- You feel uncomfortable about a decision or something that you have been asked to do
- You saw a situation that made you or someone else feel uncomfortable
- You believe Akamai would be embarrassed if the situation was publicly known

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:

1. discuss the matter with your manager; and/or
2. contact Global Ethics & Compliance at compliance@akamai.com; and/or
3. utilize our Ethics Hotline.

Any manager who receives information about a possible Code violation has a responsibility to immediately discuss the issue with Global Ethics & Compliance.

If you do not feel comfortable speaking with your manager or emailing compliance@akamai.com or you wish to remain anonymous when raising a concern, utilize our confidential Ethics Hotline, which is available:

- Online via this link or at akamai.ethicspoint.com
- By phone via toll-free numbers in every country where there is an Akamai office (*see* Appendix B on p. 30)

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 false information was knowingly provided by such employee.

Managers may never retaliate against a team member who has raised concerns in good faith or cooperates in the investigation of a reported concern.

After raising a concern, if you do not feel that the matter has been adequately addressed by Akamai, nothing in this Code prevents you from reporting any illegal activity – including any violation of the securities laws, antitrust laws, anti-bribery laws, anti-discrimination laws, or any other local, national, or international law, rule, or regulation – to Akamai's Audit Committee or to the appropriate regulatory authority.

Additional 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 for Managing Disclosure of Material Information
- Policy on Protecting Confidential, Proprietary and Personal Information
- Policy on Trading in Akamai Securities
- Record Retention Policy

OFFERING AND RECEIVING MEALS, GIFTS, ENTERTAINMENT AND OTHER THINGS OF VALUE

Akamai makes decisions about whom we do business with based upon quality, performance, price, and other *bona fide* business reasons. We expect the same of our customers and partners, which choose Akamai because we are best able to meet their business needs.

It is often customary to offer or receive gifts, meals, entertainment, travel, accommodations, and other gratuities or amenities in the course of doing business and building lasting commercial relationships.

It is **not** acceptable, however, if these things are offered or received in exchange for action (or inaction) by the recipient. Offering things of value to improperly induce a recipient to do business or provide a commercial advantage to Akamai is bribery, which is illegal everywhere we conduct business. Akamai has zero tolerance for bribery, and we must be careful to avoid even the appearance of an improper inducement.

Subject to the following summary overview, guidelines, and pre-approval requirements, it is permissible to offer or receive modest things of value in the course of doing business, and to offer or receive travel and accommodations under certain circumstances.

If you have questions about obtaining reimbursement for business expenses, please consult Akamai's Travel & Expense Policy or reach out to the Global T&E team within Finance.

Pre-approval is an internal control overseen by Ethics & Compliance to prevent bribery (and actions that may be construed as bribery).

SUMMARY OVERVIEW

Pre-approval by Ethics & Compliance is required:

When offering things of value:

- To a Government/SOE (State-owned Enterprise)recipient:
  - All offers of anything of value
- To a non-Government/non-SOE recipient:
  - Gifts or meals over $150 USD equivalent
  - Meals + entertainment or travel over $300 USD equivalent
  - Travel or accommodations over $300 USD equivalent
  - Any cash, gift cards, or other cash equivalents

When receiving things of value:

- Gifts or meals over $150 USD equivalent
- Meals + entertainment (or travel, lodging, etc.) over $300 USD

Click here to access our online pre-approval form

Use the equivalent value in your local currency that corresponds with the dollar values appearing in our Code.

We should exercise caution when offering or receiving things of value that are – or may be perceived as – lavish (too expensive) or excessive (too frequent).

Accordingly, approvable gifts, meals, and entertainment are:

- of modest value
- not a frequent occurrence
- not offered to induce any action or inaction by the recipient
- reasonable, and appropriate under the circumstances and
- not embarrassing to Akamai if publicly known
  (*also see* Business Expenses on p. 23).

Offers of travel and accommodations are generally approvable if they:

- meet the above criteria for gifts, meals, and entertainment (while recognizing the greater cost associated with travel) and
- are directly related to a *bona fide* promotional, demonstrational, or educational event.

Offers to Government Recipients

Pre-Approval Required for All Offers

No Akamai employee may offer anything of value to an employee of any government or State-Owned Enterprise (SOE) in connection with Akamai business without pre-approval from Ethics & Compliance. Pre-approval helps protect Akamai and its employees against violations of applicable anti-bribery laws such as the U.S. Foreign Corrupt Practices Act and the UK Bribery Act.

The definition of "anything of value" is broad. Apart from gifts, meals, entertainment, travel, and accommodations, it also includes internships, jobs, and charitable and political contributions.

Zero Tolerance of Bribery

It is illegal to offer, promise, give, solicit, or receive any form of bribe or kickback everywhere that Akamai conducts business.

Akamai does not tolerate bribery. Anyone who is involved in or authorizes a bribe while acting on Akamai's behalf will be terminated.

Example: You learn that your long-time business contact has recently been promoted. It is customary where you do business to send a flower arrangement to express congratulations, but the cost of the flowers may exceed the $150 USD threshold.

By obtaining pre-approval under the Code, you would be able to send a flower arrangement even if it modestly exceeds $150 USD.

Example: You wish to provide travel and accommodations to invite a key customer to our annual conference, where they will conduct a presentation on the impact of Akamai's products and services on their business.

Given the expected cost of travel and entertainment, pre-approval is required. Because the law permits the offer of travel and accommodations in connection with a *bona fide* promotional, demonstrational, or educational event, such an offer would be permissible under the Code.

Example: Our resale partner seeks a sharply discounted price so that it can generate enormous margins. They promise that enabling them to earn a such a large profit will benefit Akamai because the profits can be used to land more customers.

Be wary of such requests, as numerous companies have been prosecuted for granting discounts where the resale partner uses their outsized profits to pay bribes as a way of generating additional business.

This prohibition also applies to resale partners, distributors, consultants, and agents acting on our behalf. Akamai may not provide resellers with rebates, discounts, or credits that enable resellers to offer bribes or kickbacks.

Numerous multi-national companies, executives, and employees have been investigated and penalized for bribery over the last 15 years for violating anti-bribery laws. Such scrutiny of corporate business practices remains a high priority for law enforcement agencies across the world.

Who is a Government Official? What is a State-Owned Enterprise?

Any employee of any government entity, agency, or body – whether national, regional, provincial, state, local, legislative, executive, judicial – is considered to be a government official under the Code (and under applicable law).

State-Owned Enterprises (SOEs) are companies – including publicly listed or partially private companies – where a government exercises substantial ownership or control over its business activities.

If you are unsure whether a customer, prospect, or other counterparty may be an SOE, please consult the Ethics & Compliance team via **Ask Compliance** or by emailing compliance@akamai.com.

Offers to Non-Government Recipients

Gifts and Meals

Under the Code, an offer of gifts or meals to an employee of a current or prospective non-governmental/non-SOE customer or partner is generally considered reasonable if the total cost per recipient is under $150 USD. **Pre-approval by Ethics & Compliance is required if the cost exceeds $150 USD per recipient.**

Meals + Entertainment

Meals and business entertainment may strengthen commercial relationships and provide opportunities for discussions and negotiations. Under the Code, an offer of meals + entertainment is generally considered reasonable for non-governmental/non-SOE recipients if the total cost per recipient is under $300 USD. **Pre-approval by Ethics & Compliance is required if the cost exceeds $300 USD per recipient.**

Example: You are planning a routine business dinner with a prospective customer – the largest bank in your country – but you are not sure if it is government-owned.

Email compliance@akamai.com to seek guidance on whether the prospective customer is an SOE. Many telecommunications, health care, financial services, and natural resource companies are SOEs in the countries where Akamai operates.

Example: You host a business dinner for several customers and later realize that they ordered several expensive items and too many bottles of wine – causing the amount spent per recipient to exceed the $150 USD threshold.

Though it is impossible to pre-approve a meal that has already occurred, you should still use our pre-approval form to obtain retroactive approval. Documenting exceptions to the Code may be required by law in many of the countries where we do business.

Example: A customer wants to celebrate a long-negotiated deal by going to an adult entertainment venue after dinner. Should you go along to make the customer happy?

No. It is inappropriate to engage in business entertainment at such a venue. Any expenses incurred are not eligible for reimbursement. Paying for such entertainment using personal funds does not make this any more appropriate. Please see p. 23 for more details.

If entertainment is being offered without a meal, pre-approval is required if the value (*e.g.*, sporting event, concert ticket, greens fee, etc.) exceeds $150 USD.

Travel and Accommodations

Offering travel and accommodations in connection with a *bona fide* promotional, demonstrational, or educational event is permitted. **Pre-approval by Ethics & Compliance is required if the cost exceeds $300 USD per recipient.**

Receiving Gifts, Meals, and Entertainment

The same guidelines and value thresholds apply if you are offered gifts, meals, entertainment, etc. by an existing or prospective Akamai vendor or counterparty.

Pre-approval by Ethics & Compliance is required before receiving anything of value that exceeds these thresholds, particularly if you are involved in the engagement of, or the procurement of products and services from, the offeror's company. Be wary if you are offered something lavish or if you are repeatedly offered something of value.

If you must accept a gift or invitation to avoid causing offense or embarrassment to the offeror (*e.g.*, due to cultural norms), you may accept on behalf of Akamai so long as you promptly disclose the offer to Ethics & Compliance, which will determine how to proceed with the gift or invitation.

Guidance on Common Situations

Additional illustrative hypotheticals for common situations involving business gifts, meals, entertainment, etc. are available at **Ask Compliance** on Aloha Community.

If you have questions about whether the offer or receipt of these things of value would be appropriate, reasonable, or permissible under the Code, **Ask Compliance** on Aloha Community or email compliance@akamai.com.

Example: You are responsible for selecting a vendor for an upcoming marketing event where you expect to spend $10,000 for the vendor's services. One morning, you discover a pair of front-row tickets to an upcoming championship sporting event valued at $2,000 along with a note from the vendor expressing their interest in doing business with Akamai.

To avoid violating the Code, the best course of action is to politely return the tickets to the vendor and remind them that our Code of Ethics prohibits Akamai employees from receiving lavish gifts from business counterparties because they create the appearance of impropriety.

CONFLICTS OF INTEREST

Many of us engage in, or are asked to participate in, outside activities that broaden both our personal and professional interests. Some of us may occasionally engage in business dealings with companies that employ family members, or we may have family members that seek employment at Akamai. **These situations create a potential conflict of interest because your personal interest may interfere – or appear to interfere – with your duties and obligations as an Akamai employee.**

Pre-Approval Requirement for Potential Conflicts of Interest

Before you commit to an outside activity where your personal interest may conflict with – or appear to conflict with – Akamai's interests, it is your responsibility to:

- disclose the situation to Ethics & Compliance (using this form)
- disclose the situation to your manager
- receive pre-approval from both Ethics & Compliance and your manager after:
  - it has been determined, after consultation with any business unit or other stakeholders that may be impacted, that the outside activity does not interfere with Akamai's interests or your duties as an Akamai employee, or
  - written disclosures or other procedures are implemented to address and mitigate any potential conflict of interest.

There are, of course, a wide range of outside activities that are unlikely to create any potential conflicts. If you're not sure or if someone else could reasonably have a different view, disclosure and obtaining pre-approval protect both you and Akamai in the event that a conflict arises.

Common Situations

In general, it is violation of our Code to proceed without pre-approval to use, or appear to use, your position with Akamai for your own personal gain (apart from your Akamai compensation), or for the profit or gain of any family member or friend.

Example: Because of your product development expertise, you have been asked by a start-up company to serve on their Board of Directors. The start-up's products appear to be unrelated to what you are working on at Akamai, though the start-up provides services to its customers that seem similar to what Akamai does.

Seek pre-approval from your manager and Ethics & Compliance before making any commitment to join the start-up's Board.

Your manager can help determine whether other teams at Akamai may be developing products that would compete with the start-up's products. Ethics & Compliance can help work with the Legal Department to determine whether there may be disclosures or contractual terms that could address and mitigate any potential conflicts. It is also possible that a clear and present conflict exists that would prevent your joining the Board.

Outside Board Memberships and Governance Roles

Before agreeing to any external corporate board membership where the activities could implicate Akamai's business or your role at the Company, you must obtain pre-approval from your manager and Ethics & Compliance.

Akamai employees are known for their expertise, experience, and insight. For this reason, other companies and non-profits often ask Akamai employees to serve on advisory or governing boards of other companies.

Advisory boards provide strategic advice to the management of an organization. Akamai employees who join advisory boards must avoid the use or disclosure of any information that is confidential, strategic, or proprietary to Akamai.

Boards of Directors and other governing boards create a more direct potential conflict because governing board members owe fiduciary duties to their organizations. In other words, they are required to put that organization's interests ahead of their own interests (and as a result, Akamai's interests). All opportunities to serve on a governing board of an organization where Akamai's business could be impacted must be carefully vetted in advance by your manager and Ethics & Compliance.

Conducting Akamai Business with Families and Friends

Any opportunity to engage in Akamai business with an outside organization where a family member or friend of an Akamai employee stands to benefit from the business opportunity requires pre-approval from Ethics & Compliance and your manager. This includes introducing potential suppliers or advisors to Akamai or possible customers of our solutions.

"Family member" is construed broadly and includes your:

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

Example: Your team is looking to hire someone to assist on a big project. Your colleague refers her daughter, who graduated with a computer science degree a few years ago. Should she be considered for the position, or would she be disqualified?

Consult with your manager, your HR Business Partner or Ask HR if you encounter this situation.

The daughter may well be the best candidate for the role. Though it would be inappropriate for the daughter to report to her mother, there may be a way to manage this conflict of interest so that your team can fill its hiring needs with the best available candidate.

"Friends" include:

- social acquaintances
- classmates
- housemates

The mere fact that the outside organization may be owned or operated by a family member or friend is not necessarily disqualifying. Such an organization may be best-positioned or offer the best price for Akamai's needs. Disclosing these relationships and obtaining pre-approval protects all interested parties from the existence or appearance of any conflicts of interest.

You should also comply with Human Resources policies related to the hiring and employment of your family members.

Outside Employment

Before agreeing to any outside employment, you are required to obtain pre-approval from your manager and Ethics & Compliance.

It is a conflict of interest to engage in any outside employment (including serving as an officer, director, partner, employee, or consultant) if doing so interferes with the performance of your duties at Akamai or requires you to use Akamai's confidential information, property, or systems.

The most obvious examples of this type of conflict are working for, or providing services to, an actual or potential competitor, customer, or supplier of Akamai.

You must avoid any outside employment for an organization that competes with Akamai, that causes you to violate your confidentiality or other obligations to Akamai, or that is illegal, unethical, or would otherwise reflect negatively on our Company.

Other Corporate Opportunities

You may not exploit your position at Akamai to accept any personal payment, opportunity, or other benefit on terms that are more favorable than those generally available to the public. For example, it is not permissible to take personal advantage of your position as an Akamai employee to request or receive special benefits from a vendor or customer, or to pursue any business opportunity that you learn of as a result of your employment at Akamai.

Example: You have been offered the opportunity to write a book by a publisher that pays its authors well. The subject of the book is unrelated to your work, and your writing will not disclose any confidential information that you have learned at Akamai.

Obtain approval from your manager and discuss whether the time commitment required to write the book would interfere with your responsibilities at Akamai. And also obtain pre-approval from Ethics & Compliance.

Example: A well-known customer sponsors an annual summer music festival. This year, one of your favorite performing artists will be featured at the music festival, but the tickets have sold out. You are tempted to ask your business contact at the customer to see if he can obtain tickets for you. Would this be okay?

No. It is inappropriate to leverage your position or business relationships at Akamai for your personal advantage. You should avoid putting yourself in an awkward or conflicted position. What if your business contact seeks a discount when the customer contract is up for renewal – and he reminds you about the music festival tickets that he obtained for you?

Personal Investments

You may not have a financial interest in any organization if that interest would create, or create the appearance of of, a conflict of interest with Akamai. Such organizations include suppliers, customers, business partners, competitors, and other Akamai counterparties.

Pre-approval is required for all investments in startups or other private companies that may be (or become) Akamai competitors, particularly if you might be asked to provide advice or participate in the other company's business decisions.

When considering a personal investment, consider the following factors:

- the extent to which your position with Akamai brings you in contact with the other company
- 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 (1%) of the outstanding stock of a company where you are not involved in advising the company or participating in its business decisions is permissible.

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 a trade and even if you have not been notified that you are "blacked out" from trading. 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.

Example: While making a cup of coffee, you overhear colleagues discussing a substantial change to our expected revenue in the next quarter. Can you buy or sell Akamai shares based upon the information you overheard?

No. Under these circumstances, you may not trade Akamai securities until the beginning of the business day after the public announcement of our quarterly earnings regardless of whether you were notified by the Legal Department about being "blacked out" from trading.

POLITICAL AND CHARITABLE CONTRIBUTIONS

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

Political Contributions

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 Akamai funds, property, or services, consult with Ethics & Compliance prior to making the contribution or statement.

You may not, except with prior approval from Akamai's Chief Financial Officer and its 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 (except for Akamai services provided to a *bona fide* customer that happens to be political in nature).

Charitable Contributions

Akamai is proud of the generous spirit of our employees and encourages you to volunteer your time, talents, and energy to support charitable causes and non-profit organizations. Akamai employees may freely donate to charities in their personal capacity.

Established in 2000, the Akamai Foundation is dedicated to encouraging the next generation of technology innovators by supporting STEM education, with a focus on the pursuit of excellence in mathematics in grades K-12. Requests for donations from the Foundation in support of these causes should be directed to akamaifoundation@akamai.com.

Our customers occasionally seek contributions from Akamai in support of charities that are important to them. These *ad hoc* requests often arise through our sales organizations and may sometimes create the appearance of impropriety. **Pre-approval by Ethics & Compliance is required for customer-requested charitable contributions.**

Example: While you are negotiating a renewal agreement with a customer, your customer business contact sends you a request for Akamai to purchase a $10,000 table at an annual fundraising dinner of a charity that the customer sponsors. It is a well-known charity that supports an important cause, and a charitable donation from Akamai would probably help ensure that the customer renews its contract.

Use our pre-approval form to disclose the request. The Ethics & Compliance team will coordinate with business unit leadership and the Legal Department to evaluate the circumstances around the request to assess the ethical and legal implications.

EMPLOYEE RELATIONS

Equal Opportunity

At Akamai, we value and celebrate the diversity of our workforce and the uniqueness of every employee. We believe that we best serve our customers and enrich our own culture through the diverse skills, experiences, and backgrounds that each of us brings to the company.

Akamai is subject to a broad range of laws and regulations relating to employment rights in the countries where our employees live and work. We strive to provide equal employment opportunities to candidates and employees. We do not discriminate based on race, color, ethnicity, ancestry, national origin, religious creed, gender, sex, pregnancy, sexual orientation, gender identity, gender expression, parental status, physical or mental disability, genetic information, age, military or veteran status, or any other characteristic protected by Akamai's policies or applicable laws.

All employees are expected to report suspected discrimination promptly and to never retaliate against anyone who raises a good faith concern that unlawful discrimination has occurred.

Mutual Respect

At Akamai, we nurture our professional relationships and create an environment of inclusion and collaboration. We do this by supporting a safe and productive environment that fosters open dialogue and the expression of ideas, free from harassment and hostile conduct. We treat everyone with dignity and respect.

Akamai will not tolerate harassment, abuse, or offensive conduct based on race, color, ethnicity, ancestry, national origin, religious creed, gender, sex, pregnancy, sexual orientation, gender identity, gender expression, parental status, physical or mental disability, genetic information, age, military or veteran status, or any other characteristic protected by Akamai's policies or applicable laws.

Harassment includes any actions, language, written materials or objects that are directed or used in a way that undermines or interferes with a person's performance at work or creates an intimidating, hostile or offensive work environment.

Akamai strives to provide a work environment and culture where all employees feel that they can contribute and perform to the best of their abilities. Our diverse workforce combines individuals from different backgrounds and experiences that together form a more creative, innovative, and productive workplace.

By fully embracing diversity, we foster the growth of our talent that not only leads to creating better products, solutions, and services, but also to being better people. We are able to bring together our shared values and culture to build stronger relationships, to see ourselves within each customer, and to bring our best to work each and every day.

If you believe that you have been harassed or have witnessed such behavior, please report the incident to any member of the Human Resources team, the Ethics & Compliance team, or our confidential Ethics Hotline.

Workplace Safety

All Akamai employees are expected to perform their work in accordance with Akamai health and safety policies and to comply with applicable health, safety and environmental laws and regulations. Accidents, injuries, unsafe work conditions, discharges to the environment, and other safety concerns should be immediately reported to your manager, to the Global Real Estate & Workplace Productivity team, or to the Human Resources team.

If you encounter a work-related accident at work, please report the situation using GREWP's Incident/Accident Report Form.

You may not use, consume, be under the influence, possess, or distribute narcotics, pharmaceuticals, or any other controlled substance (except when authorized for medical treatment) while at an Akamai office location.

Prudent, moderate, and lawful alcohol consumption during legitimate business entertainment is acceptable. However, consumption of alcoholic beverages on Akamai premises is only permitted with prior management approval and during company-sponsored events.

WORKING WITH THIRD PARTIES

Akamai works with numerous external organizations, including our customers, suppliers and business partners. How we interact with these organizations is critical to Akamai's continued success.

Working with Suppliers and Vendors

To determine the best suppliers and vendors for Akamai, our Global Procurement team impartially assesses the qualifications of our suppliers and vendors, the quality of their products and services, as well as the company's track record of performance and its reputation for ethical business practices.

Akamai employees must not exert or attempt to exert influence with the aim of obtaining or deriving a personal or familial benefit from suppliers or vendors or from Akamai's decision to procure products or services from a particular supplier or vendor. Even the appearance of undue influence undermines Akamai's integrity.

Before entering into any new purchasing agreement or commitment to any suppliers or vendors, you should review the Global Procurement Policy and reach out to the Global Procurement Team.

If you wish to refer a vendor or supplier that is owned or operated (or that employs) a family member or friend, seek pre-approval before making the referral to our Global Procurement team.

Working with Resale Partners, Distributors, and Similar Third Parties

We only engage honest and professional partners, resellers, distributors, and similar third parties that commit to doing business ethically and in compliance with applicable laws. The actions of these third parties can have a significant reputational and legal impact on Akamai.

It is therefore critical to understand the third party's qualifications and reputation prior to engagement. You must work with Legal, Ethics & Compliance, Finance, and any other applicable stakeholders to ensure that Akamai may comfortably engage a new partner, reseller, distributor, or similar third party.

You should never ask or suggest that a third party act in a manner that is illegal or contrary to Akamai's policies. If you believe a third party has engaged in illegal, corrupt, or unethical conduct while working with Akamai, please report this immediately to the Ethics & Compliance team or to Akamai's confidential Ethics Hotline.

Akamai conducts due diligence on prospective resale partners, distributors, and similar third parties that act on our behalf.

If you are seeking to engage a new partner, please coordinate with Channels leadership and have the prospective partner complete our online Due Diligence Form.

Akamai may be responsible for the actions of third parties that act on our behalf. Their misconduct may result in legal and reputational harm to Akamai.

PRIVACY AND CONFIDENTIAL INFORMATION

Privacy

Akamai is committed to the ethical treatment and handling of personal information that it processes as part of its business operations and services. Our commitment to the data protection rights of Internet users, customers, and employees is a critical part of the trust granted to Akamai by those whose data we process.

Beyond Akamai's commitment to complying with the privacy and data protection laws in the countries where we operate, we also have an ethical obligation to protect and avoid misuse of personal information. If you have access to any personal information as part of your role, you must ensure that you protect such information and use it only for the legitimate purposes for which it was collected, in accordance with applicable law, Akamai's policies on handling personal data, and this Code.

More information about Akamai's Data Protection and Privacy Program is available through our Privacy Trust Center.

Preserving the Confidentiality of Our Information

Our continued success depends on our ability to protect information that is confidential, strategic, or proprietary to Akamai – including our intellectual property, which is one of our most valuable assets. Confidential information 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 confidential information in public areas such as elevators, trains, or airplanes, where such conversations can be overheard. Use care when communicating about Akamai on social media.

You may sometimes need to disclose our confidential information to potential customers or business partners. If so, you should first contact the Legal Department to ensure that an appropriate non-disclosure agreement is signed by all necessary parties before any such disclosure occurs. You should never sign a third party's nondisclosure agreement without prior approval by the Legal Department.

Do not leave documents containing information that is confidential, strategic, or proprietary to Akamai in areas where unauthorized individuals can read or obtain them.

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

Questions about Non-Disclosure Agreements (NDAs)?

Ask Legal on Aloha Community

Preserving the Confidentiality of Others' Information

Almost all non-disclosure agreements executed by Akamai are mutual in nature. This means you must protect the confidential information of our partners, suppliers, contractors, and customers that is exchanged under such an agreement in the same manner as you are required to protect Akamai's 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 to confirm there is an NDA in place and use that information solely for legitimate business purposes and as permitted by any applicable Law, agreement, and the Code.

PROTECTION AND PROPER USE OF AKAMAI PROPERTY

Akamai provides information technology and other resources to you for the purpose of performing your role. You have a responsibility to protect and preserve our property, to use it appropriately and to prevent its misuse, theft, or waste.

The services, software and products that Akamai provides may only be used for legitimate business purposes and not for the personal benefit of you or others. Company property, such as computers, office supplies, and printers, should be used in accordance with your employment to further Akamai's legitimate business objectives.

To the extent that Akamai property is used for occasional personal use, it should not interfere with our business or the performance of your responsibilities. Personal use should be appropriate and kept to a minimum. Impermissible uses include (but are not limited to) engaging in illegal activity, viewing inappropriate material such as pornography, illegal online gambling, visiting hate sites or those that advocate intolerance of others, or sites that may jeopardize Akamai's reputation.

Akamai resources should never be used for outside employment or personal political activities.

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

- Taking office supplies or equipment for personal use at home or outside the office
- Using Akamai-leased corporate housing for a personal stay
- Downloading pornographic materials, even outside of business hours
- Downloading illegal copies of movies, television shows, books, or music
- Creating or forwarding emails containing crude or offensive materials to fellow employees or others outside of Akamai

BUSINESS EXPENSES

Akamai funds may only be used for legitimate business purposes. All employees are therefore expected to engage in the responsible use of Akamai funds for travel, meals, entertainment, and other business-related activity. Expense claims must be honest and accurate.

You are required to follow Akamai's policies regarding the use of corporate credit cards, preferred travel vendors, expense limits, receipts, expense reports and other travel-related matters. You are expected to truthfully, accurately, and completely record travel and hospitality expenses. Akamai funds should not be used for personal travel or entertainment or to supplement personal income. False, fraudulent, or exaggerated expense claims will be investigated and may result in disciplinary action, up to and including termination.

Akamai-sponsored business entertainment should never take place at establishments that would negatively reflect on Akamai or that are not aligned with our values. Such inappropriate establishments include, but are not limited to, "adult entertainment" venues (*e.g.*, strip clubs, "gentleman's clubs", hostess bars, room salons, brothels, etc.), businesses that promote the use of escort services or sex workers, and those that use forced or child labor.

In addition, business entertainment should not take place at establishments that restrict entrance or participation based on discriminatory factors such as race, ethnicity, national origin, religion, gender, sexual orientation, disability, or any other characteristic protected by Akamai's policies or applicable laws.

Expenses incurred at the prohibited establishments described above will not be reimbursed. Moreover, these venues are not acceptable for business entertainment, even if such expenses are not submitted for reimbursement.

Please consult the Global Travel & Expense Policy for more information about the rules and guidelines regarding reimbursable expenses.

It is fraudulent to obtain reimbursement for expenses that are personal in nature or that are based upon fake receipts, falsified documents, or manipulated exchange rates:

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

- Seeking reimbursement for clothing, jewelry, electronics, and other personal items while falsely claiming that they are gifts for customers
- Seeking reimbursement for personal meals that are disguised as meals with customers
- Using favorable exchange rates to increase your reimbursement amount
- Seeking reimbursement for exaggerated mileage claims while driving to conduct Akamai business
- Adding non-participants to an expense claim for business entertainment to artificially reduce the cost per person
- Using fake receipts to support a reimbursement claim
- Seeking reimbursement for expenses at an inappropriate entertainment venue by claiming that the venue was a restaurant

Employees that engage in these forms of fraud will be subject to disciplinary action, up to and including termination or referral for criminal prosecution.

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. 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.

Accuracy of Books, Records, and Public Reports

As a publicly traded company, Akamai is required by applicable law to provide full, fair, accurate, and timely disclosure in reports and documents submitted to regulatory agencies and in other public communications. Failure to do so may result in legal and reputational harm and may include civil and criminal penalties for the Company and its employees.

It is therefore 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.

Side Deals and Side Letters Prohibited

You must never submit information that may be included in the Company's financial statements, books, or records that intentionally hides or disguises the true nature or timing of any transaction. You must not enter into any unauthorized agreements or allow any activity that leads to the same.

All terms and conditions of agreements entered into by Akamai must be formally documented. Contract terms and conditions define the key attributes of Akamai's rights, obligations, and liabilities. Making business commitments outside of the formal contracting process, through side deals or side letters (whether written or verbal) is prohibited. You should not make any verbal or written commitments that create a new agreement or modify an existing agreement outside of the formal contracting process.

Example: You receive an email from a customer that provides notice of their intention to terminate their agreement with Akamai. Because the cancellation will negatively impact your team's quarterly sales performance, you decide to delay reporting the termination to Finance until a subsequent quarter.

Akamai is required by law to accurately report its financial performance every quarter. Misrepresenting or delaying the recognition of customer revenues or losses may subject you and/or Akamai to legal liability.

Example: Your customer business contact asks if you will informally agree to a significant discount while promising you that the customer will purchase additional products and services at the time of renewal. She suggests putting the agreement in a side letter that only she and you will know about. That way, she'll get credit from her employer for obtaining a discount, and you'll receive commissions for additional sales in the future.

This type of side deal is prohibited. If the customer really does intend to purchase additional future products in exchange for a discount on existing products, the agreement must be transparently documented in a formal, written contract.

Record Retention

Akamai employees are responsible for properly managing information and records. The definition of "information" is very broad and includes all documents and data. "Records" are a subset of information and must be kept because either they have enduring business value or because there is a legal requirement to do so.

Specific retention periods for particular record types may be established by the appropriate business unit, department, or function that is responsible for creating, receiving or maintaining such records, in consultation with Akamai's Legal and Finance Departments.

Legal Hold

From time to time, Akamai may be required to retain records and information beyond the period they would normally be kept. This is typically due to audits, litigation, or other legal matters.

Records and information that may be required for litigation or other legal matters may be subject to a "legal hold" by the Legal Department and may include materials in a wide range of formats and media, including paper, memory devices, emails, instant messages, discs, and data from corporate networks and systems. Information that is subject to a legal hold cannot be altered, destroyed, deleted, or modified in any manner.

The Legal Department will notify the relevant individuals about a legal hold and will provide instructions for retaining the records and information. Recipients of a legal hold must ensure that these instructions are followed. A legal hold remains in effect until further written notice from the Legal Department.

Audits and Investigations

From time to time, you may encounter auditors, attorneys or investigators who request information from Akamai. All employees must support any audit or investigation by providing timely and accurate information. Never mislead or attempt to improperly influence any investigation, audit, or inquiry.

If you become aware of threatened litigation or receive an investigative demand or subpoena from a law enforcement agency, immediately contact the Legal Department.

COMPLIANCE WITH LAWS

Akamai conducts business around the world and, as a result, is subject to local, national, and international laws, rules and regulations. You are required to be generally familiar with the laws that apply to your responsibilities at Akamai and to comply with such laws wherever Akamai does business. In particular, you must comply with the U.S. Foreign Corrupt Practices Act, the UK Bribery Act, and other anti-bribery and anti-corruption laws where Akamai business is conducted.

If you are advised by Ethics & 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.

Antitrust and Competition Law

Antitrust and competition laws prohibit arrangements or actions that could unreasonably restrict a free and competitive marketplace, including using a dominant market position to try to drive a competitor out of business or to artificially increase prices.

Therefore, you should not discuss, set, or agree to influence prices with an Akamai competitor and should avoid any meeting or communication with a competitor where there is the possibility that prices, discounts, or other business terms could be discussed, unless an Akamai lawyer is present. You should never agree with a competitor to divide customers, territories, or markets, or to boycott particular suppliers or customers.

You should also avoid any discussions that may appear to involve the coercion of a customer to purchase products or services that they do not require or desire by improperly tying the unwanted purchase to the contemplated transaction.

Sanctions and Export Controls

Akamai may be subject to laws and regulations that restrict the export of certain technologies or software because of national security and other considerations. In addition, certain countries may be subject to comprehensive sanctions that prohibit Akamai from engaging in any business or operations in those countries. **If you encounter issues relating to sanctions or export controls, you must consult Ethics & Compliance and the Legal Department before taking any action.**

Seek advice from Legal before you:

- enter into joint ventures or other agreements with competitors;
- exchange any confidential, proprietary, or strategic information with competitors;
- accept invitations from competitors outside of normal business contexts.

It is permissible to:

- Discuss general matters with competitors, provided that no commercially or company-sensitive information is disclosed or exchanged;
- research our competitors using public sources;
- provide technical documentation in support of a public tender;
- provide product specifications to potential customers.

Example: A government official involved in the administration of a public tender asks you to help draft some of the tender requirements. Is that okay?

No. It is illegal to ghostwrite the contents of public tender documents or to exert illicit influence by granting undue advantages or through gifts, meals, or entertainment.

Example: A competitor is granting special rebates to customers to grow market share. May I contact the competitor and agree on sales prices and rebates to allocate market share?

No. Jointly determining rebates and sales prices is a serious violation of anti-trust and competition law.

Theft and Fraud

Anyone who engages in or assists others with theft, fraud, embezzlement or forgery in connection with their roles at Akamai will be subject to disciplinary action up to and including termination (and may be subject to criminal prosecution). Help safeguard our assets and reputation by being alert to and reporting any kind of fraudulent activities at or against Akamai, its employees, customers, business partners or stakeholders.

RESPONSIBLE COMMUNICATION

Akamai strives to communicate in ways that demonstrate our values, further our purpose, and enhance our reputation and brand. You must avoid offensive, inflammatory, or aggressive language when communicating in connection with your role and avoid language that would embarrass or disparage Akamai.

The use of foul, obscene, or harassing language or images on e-mail, the Internet or voicemail is prohibited. Employees are expected to act professionally when using our business systems and should not send messages that harass or annoy other employees or third parties.

E-mail messages should be treated with the same degree of security and confidentiality as written documents and should only be sent to recipients who have a legitimate need to receive them.

Public Disclosures & Press Inquiries

Public statements made by Akamai must be carefully prepared to ensure accuracy, fairness and compliance with legal requirements. Only an appropriate member of Akamai senior management, Public Relations or Investor Relations should respond to inquiries from the media or the financial community.

You may not discuss internal Akamai matters with any outside party, except as required in the performance of your responsibilities. Avoid discussions about Akamai's financial performance, strategic objectives, legal matters, policy decisions, or rumors or conjecture on the Internet.

If you receive any inquiries about Akamai from the media or financial community, you should politely decline from commenting and refer the inquirer to someone in Public Relations or Investor Relations.

Example: A new employee who recently worked for a competitor has joined Akamai. He tells you in confidence that he has important sensitive information about his former company, including pricing and sales strategy. Are you allowed to review and use that information?

No. Explain to your new colleague that Akamai employees are not permitted to accept or abuse a competitor's commercially sensitive information. Reach out to Legal and to Ethics & Compliance.

Be thoughtful about verbal or written communications (including emails and text messages) that may be taken out of context and create the appearance of misconduct.

AMENDMENTS AND WAIVERS OF THIS CODE

Akamai reserves the right to amend or revise this Code at its discretion. Certain changes and supplements may be made to the Code to comply with local legal or regulatory requirements; such modifications shall apply only to Akamai employees in those jurisdictions.

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

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

Contact compliance@akamai.com if you have any suggestions or proposed amendments to our Code of Ethics.

Appendix A

If you wish to raise a concern through management or through other avenues, please consult the table:

Types of Issues	Persons to Contact
General question, issue, or concern	• Your supervisor • compliance@akamai.com • Anyone in the Legal Department
Concerns about your supervisor	• Your HR business partner • compliance@akamai.com • Anyone in the Legal Department
Concerns about the Chief Human Resources Officer	• compliance@akamai.com • General Counsel • Chairperson of the Audit Committee of our Board of Directors • Chief Executive Officer
Concerns about the General Counsel	• Chairperson of the Audit Committee of our Board of Directors • Chief Executive Officer
Concerns about the Internal Audit function	• compliance@akamai.com • General Counsel • Chairperson of the Audit Committee of our Board of Directors
Concerns about an executive officer or members of the Board of Directors	• compliance@akamai.com • Head of Internal Audit • General Counsel • Chairperson of the Audit Committee of our Board of Directors • Chief Executive Officer
Concerns about questionable accounting, auditing, financial matters, or internal controls	• compliance@akamai.com • Head of Internal Audit • General Counsel • Chairperson of the Audit Committee of our Board of Directors • Chief Executive Officer

Appendix B

All calls to the Ethics Hotline are free of charge and your identity will remain anonymous upon your request. The Ethics Hotline is hosted by an independent third party.

Argentina	From an outside line, dial the direct access number for your location and then: 0800-345-5411
Australia	From an outside line, dial the ITFS number for your location and then: 1-800-549-661
Belgium	From an outside line, dial the direct access number for your location and then: 08-800-100-10. At the English prompt, dial: 844-459-7722
Brazil	From an outside line, dial the ITFS number for your location and then: 0800-892-0406
Canada	1-844-459-7722
China	From an outside line, dial the GIS number for your location and then: 400-661-2225
Costa Rica	From an outside line, dial the direct access number for your location and then: 0-800-228-8288 (Spanish) or 0-800-225-5288 (English). At the prompt, dial 844-459-7722
Czech Republic	From an outside line, dial the ITFS number for your location and then: 800-143-882
Denmark	From an outside line, dial the direct access number for your location and then: 800-100-10. At the English prompt, dial: 844-459-7722
France	From an outside line, dial the ITFS number for your location and then: 0800-91-8346
Germany	From an outside line, dial the direct access number for your location and then: 0-800-225-5288
Hong Kong	From an outside line, dial the ITFS number for your location and then: 800-96-0022
India	From an outside line, dial the direct access number for your location and then: 000-117. At the English prompt, dial: 844-459-7722
Israel	From an outside line, dial the ITFS number for your location and then: 180-931-7242
Italy	From an outside line, dial the ITFS number for your location and then: 800-797131
Japan	From an outside line, dial the GIS number for your location and then: 0-120914682
Korea	From an outside line, dial the ITFS number for your location and then: 00798-1-1-003-7887
Malaysia	From an outside line, dial the ITFS number for your location and then: 1-800-81-9042
Mexico	From an outside line, dial the direct access number for your location and then: 800-681-8153
Netherlands	From an outside line, dial the GIS number for your location and then: 0800-020-1727
Poland	From an outside line, dial the GIS number for your location and then: 00-800-151-0277
Singapore	From an outside line, dial the GIS number for your location and then: 800-110-2353
Spain	From an outside line, dial the direct access number for your location and then: 900-99-0011. At the English prompt, dial: 844-459-7722
Sweden	From an outside line, dial the GIS number for your location and then: 0201408298
Switzerland	From an outside line, dial the direct access number for your location and then: 0-800-890011. At the English prompt, dial: 844-459-7722
Taiwan	From an outside line, dial the direct access number for your location and then: 00-801-102-880
Turkey	From an outside line, dial the direct access number for your location and then: 0811-288-0001
United Arab Emirates	From an outside line, dial the direct access number for your location and then: 8000-021 or 8000-555-66 or 8000-061 (for military, USO, and cellular). At the English prompt, dial: 844-459-7722
United Kingdom	From an outside line, dial the ITFS number for your location and then: 0808-234-3765
United States	1-844-459-7722