



Modern Slavery and Human Trafficking Statement for FY2025

May 2026



Table of Contents

Introduction	2
Our Structure, Operations, and Supply Chain	2
Akamai Structure	2
Akamai Operations	3
Akamai Supply Chain	4
Our Policies	5
Risks of Modern Slavery Practices and Mitigation Procedures	6
Training, Culture, and Accountability	8
Next Steps	9
Signatures	10



Introduction

This statement is a joint statement made pursuant to Section 54(1) of the UK Modern Slavery Act 2015, the Australia Modern Slavery Act 2018 and Canada's Fighting Against Forced Labour and Child Labour in Supply Chains Act, and constitutes the statement against modern slavery, forced labor, child labor 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 2025 (period from 1 January 2025 to 31 December 2025).

In this statement, the term modern slavery refers to all forms of forced labor, including child labor, prison labor, indentured labor, bonded labor, military labor, slave labor, and any form of human trafficking.

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 57 subsidiaries (hereinafter collectively referred to as "**Akamai**") and has offices in multiple locations globally¹. Akamai, as the cloud company that powers and protects life online, provides leading solutions for content delivery, cybersecurity, and cloud computing.

As of December 31, 2025, we had over 11,000 employees worldwide, located in more than 30 countries and representing over 100 nationalities, all of which we believe helps bring a global perspective to our operations. Around 0.8% and 2.1% of our global workforce are based in Australia and the United Kingdom respectively.

Our employees – our human capital – are our most valuable resources as they are fundamental to our innovation, the operation and ongoing enhancement of Akamai's solutions and global network, the fostering and maintenance of relationships with our customers and the management of our operations. The importance of our workforce to our success is underscored by the inclusion of corporate mission critical goals centered on our employees.

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



In 2025, we continued to focus on fostering a community that enables employees to be productive and continue to deliver a positive experience for both employees and customers by living our values each day. Different aspects of our human capital management are overseen by our board of directors as well as its Talent, Leadership and Compensation Committee and Environmental, Social and Governance Committee.

Akamai is an equal opportunity employer that values the strength that diverse perspectives bring to the workplace. 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 support an optimal working environment. We have eight employee resource groups ("ERGs") that offer opportunities for employees to come together for mutual support, education, and development. ERGs encompass different racial and ethnic groups, persons with different physical or cognitive abilities, parents, military veterans, the LGBTQIA+ community and women and are open to all employees.

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.

We conduct annual internal pay equity analyses (with the assistance of a nationally-recognized outside consultant), and we take action to remedy identified discrepancies when we believe it is appropriate. To date, no widespread patterns of disparity have been identified.

Akamai Operations

Since 1998, Akamai has developed and provided solutions for global enterprises to build, deliver and secure their applications and digital experiences on our globally distributed infrastructure. As of December 31, 2025, our massively distributed global infrastructure was comprised of core and distributed compute sites, more than 4,300 edge points-of-presence in over 130 countries and approximately 700 cities, and our underlying global network integrated with roughly 1,200 network partners. With this scale and distribution, Akamai has visibility and insight into traffic volumes, congestion, attack patterns, vulnerabilities, and other activities across the internet's complex intersections of networks and systems. Leveraging these insights, Akamai offers solutions designed to protect our customers from threats and attacks, along with full-stack compute solutions to build and deliver high-performance, low-latency applications across our uniquely distributed architecture and edge network.



Today, billions of people go online to work, learn, shop, bank, and communicate more . We firmly believe that the internet’s role in transforming the way we exchange ideas and information and conduct business is more vital than ever, especially as those interactions are increasingly driven by AI. Our strategy is to help continue to power and protect business online by offering security, computing, delivery and infrastructure services with the industry-leading reliability, scale and expertise our customers need to grow their business with confidence.

We market and sell our solutions globally through our field sales and services organization and through many channel partners, including AHEAD, Avant, BV Tech, Carahsoft, CPD, Deloitte, Deutsche Telecom, Doyen, Guidepoint, Kyndryl, LevelBlue, Macnica, Microsoft Azure, Netpoleon, Oplium, Optiv, Presidio, SHI, Telefonica Group, Trace3 and WWT. 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 marketplaces. By aligning with these partners, we believe we are better able to market our solutions and leverage partners to add valuable services to complement our offering and improve the customer experience. Our sales, services, and marketing professionals are based in locations across the Americas, Europe, the Middle East, and Asia-Pacific and focus on direct and channel sales, sales operations, professional services, account management, and technical consulting.

Akamai Supply Chain

During the fiscal year 2025, Akamai engaged with more than 3,541 suppliers from 78 countries globally. Please find below the number of suppliers we engaged within the following countries:

Country	N° of suppliers	N° of countries
Australia	56	3
UK	178	17
US	1251	39

Akamai’s supply chain includes the suppliers of equipment needed to build and maintain our globally distributed infrastructure, 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 spending 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](#) that addresses, among other things, modern slavery, human trafficking, and other labor abuses or human rights violations. In addition, effective April 1, 2026, Akamai replaced its former [Supplier & Partner Guiding Principles](#) with two dedicated codes of conduct: a [Code of Conduct for Suppliers](#) and a [Partner Code of Conduct](#). Both codes contain detailed human rights provisions, including the strict prohibition of forced labor, slavery, human trafficking, and any form of involuntary labor, as well as requirements relating to the prohibition of child labor, fair working conditions, freely chosen employment, and compliance with applicable modern slavery and human trafficking laws. These policies embody our corporate values and international human rights principles, such as those 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.



Our Human Rights Policy is intended to promote respect for human rights, foster understanding and provide value to the communities in which we operate. We are committed to ensuring that our employees, the people who work for our contractors, customers, suppliers and individuals in the communities affected by our activities, are treated with dignity and respect.

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 comply with applicable laws and regulations and conduct themselves in a manner that is consistent with our [Code of Ethics](#), [Human Rights Policy](#) and Akamai's [Code of Conduct for Suppliers](#). Akamai has the contractual right to audit our suppliers' and vendors' records to review such compliance, and we contractually reserve the right to terminate any engagement in which we become aware of conduct that violates applicable law, regulation, and policies.

Akamai's Responsible Supply Chain Program (RSCP) is focused on fostering a responsible supply chain through engagement in mutually beneficial relationships with a wide range of responsible suppliers and partners that are environmentally and socially conscious. We look to partner with businesses that share our values, mitigate supply chain risks, care for their employees, inspire better business, and keep evolving with our corporate goals and corporate responsibility values that Akamai is committed to as a company, including those concerning modern slavery.

To gain insight into potential supply chain risks and opportunities and to enhance our engagement with suppliers, in 2022 we entered into a professional partnership with EcoVadis. EcoVadis is a trusted provider of business sustainability ratings serving a global network of more than 150,000 rated companies. The EcoVadis sustainability assessment provides an evaluation of how well a company has integrated the principles of sustainability and corporate social responsibility into their business and management processes. Using the EcoVadis platform, we have collected details on the performance of our participating suppliers in



different key ESG focus areas, which are environment, labor and human rights, ethics, and sustainable procurement.

Between 2022 and 2024 we ran annual RSCP campaigns in collaboration with EcoVadis to assess the performance of our participating strategic suppliers in the key ESG focus areas mentioned above. Our rated suppliers scored throughout all of our campaigns significantly better than the EcoVadis network-wide average of evaluated companies.

For our 2024 campaign — which closed at the end of February 2025 — we invited 168 significant and strategic suppliers and partners to participate in our RSCP via the EcoVadis platform, representing a significant portion of our annual spend or holding strategic importance to our business. Our focus remained on two key categories: strategic traditional procurement vendors and strategic network partners, which are essential for expanding our global infrastructure. At the campaign's conclusion we received scorecards for 113 invited suppliers and partners, representing approximately 67.3% of invitees - also scoring significantly better than the EcoVadis network-wide average of evaluated companies.

As regulatory expectations and supply chain due diligence requirements continue to evolve, we advanced our Responsible Supply Chain Program by transitioning in the third quarter of 2025 from EcoVadis to osapiens - a leading European EGS software provider, with over 2500 customers worldwide - as our partner for supplier sustainability and supplier due diligence assessments to move from a strategic supplier evaluation approach to a risk-based model with broader supply chain coverage.

While in the past, we invited the most significant and strategic suppliers and partners — representing a substantial portion of our annual spend or holding strategic importance to our business — to participate in our supply chain review through the EcoVadis platform, we expanded our scope in 2025 to assess through the osapiens platform our entire supply chain using AI-enabled tools and a streamlined, audit-ready process with defined risk categories and supplier self-assessments. Based on an initial screening, a sub-set of our supply chain with a higher risk profile were invited to complete a more detailed self-assessment for enhanced due diligence on environmental, social, and governance risks, which are currently reviewed during the first half of 2026 and will inform ongoing engagement and risk mitigation activities.

Besides our annual RSCP campaigns we work closely with our suppliers and partners to support continuous improvement and identify partnerships and programs to help them reduce their environmental impact and improve their ESG practices. We remain focused on increasing participation in and awareness of the program internally and externally.

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 [Code of Conduct for Suppliers](#). 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.

Remediation: Akamai did not identify any instances of forced labour or child labour in its activities or supply chains in FY 2025. Accordingly, no remediation measures were required during the reporting period.

Remediation of loss of income to vulnerable families: In FY2025, Akamai did not identify any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in its activities or supply chains. Accordingly, no such remediation measures were required during the reporting period.

Training, Culture, and Accountability

Through the RSCP, Akamai provides training to help educate employees about the risks of modern slavery and human trafficking in our supply chain and in our business.

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 – if their actions fail to meet these expectations.

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

Akamai maintains a dedicated ESG Office that provides a cohesive approach to ESG matters across Akamai, including on the prevention of modern slavery and human trafficking. Our ESG team is responsible for driving a global strategy and ensuring that Akamai's initiatives align with regulatory requirements, industry standards and stakeholder expectations. By doing so, it strives to promote long-term sustainability and uphold ethical business practices across the organization.

To foster a strong ESG governance structure, Akamai maintains an ESG Expert Committee, bringing together subject matter experts tasked with guiding the organization's strategy and initiatives around corporate responsibility and related factors. The committee provides insights



into emerging trends and risk mitigation and advises on relevant environmental or social topics impacting Akamai.

Board oversight of these matters primarily occurs through the committees of the Board, including our ESG Committee, which oversees management's environmental initiatives, including our sustainability goals, corporate governance matters and social matters (including receiving periodic management reports on social matters, corporate culture and engagement as it relates to employees and the charitable activities of the Akamai Foundation); the Audit Committee, which provides regular oversight of our ethics and compliance, data privacy protection program and cyber and network security and resiliency matters; and the TL&C Committee, which reviews social matters on an ongoing basis, including employee and leadership development, and recommends to the Board certain compensation metrics. Our Board also exercises direct oversight of these initiatives. For example, the Board conducts at least annual reviews of our employee related matters with management. The Board or its committees offers management feedback on ESG best practices that help guide development of our various corporate responsibilities and related initiatives.

Investing in our ESG initiatives is a core part of our purpose to make life better for billions of people, trillions of times a day through:

- Sustainability: Improving our energy efficiency and reducing our environmental footprint — and that of our partners — to minimize our impact on biodiversity and society
- Our People: Providing a work environment and culture where all employees are able to give, thrive and be productive
- Governance: Continually refining our corporate governance policies, building a responsible supply chain, and operating our business ethically
- Data Privacy and Security: Committing to robust and cutting-edge data security, privacy best practices and customer protection
- Communities: giving back to local communities through STEM education and community through employee volunteerism, educational partnerships, disaster relief and crisis response

Further information on Akamai's corporate responsibility and ESG initiatives can be found on [Akamai's Corporate Responsibility website](#).

In late 2024, Akamai rolled out its annual online training module on modern slavery to raise awareness on what are the various forms of modern slavery, provide the tools to identify it, and how to report suspected modern slavery violations. This training module is available to all employees, being mandatory to those employees who are involved in the procurement of goods and services from our suppliers, which are the groups that most likely could come



across any modern slavery issues. The completion rate of the modern slavery training by this group in 2024 was 84%.

Assessing effectiveness

We assess the effectiveness of our program using the following methods and indicators:

- Monitoring the risk of modern slavery utilizing the risk assessment model under the osapiens platform and running annual campaigns to have selected higher risk suppliers complete risk assessment questionnaires,
- Evaluating the effectiveness of modern slavery training for employees, especially those involved in procurement.
- Periodically reviewing relevant policies, due diligence processes, supplier engagement outcomes and governance reporting to identify opportunities to improve Akamai's approach over time.

Next Steps

We remain committed to preventing modern slavery within our business operations and supply chains. To uphold this commitment, we continuously assess and improve our human rights initiatives by regularly reviewing our policies, procedures, and practices, and staying informed about industry best practices.

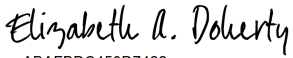
In 2025, we completed the drafting of two formal codes of conduct to replace the existing Guiding Principles for Suppliers & Partners: the [Code of Conduct for Suppliers](#) and the [Partner Code of Conduct](#). These two codes of conduct were published in Akamai's website in April 2026.

Signatures

This joint statement was prepared by Akamai's ESG Office, Legal and Ethics & Compliance departments, and approved by Akamai Technologies, Inc., Akamai UK, and Akamai Australia by the appropriate governing body (including by way of board resolutions of Akamai UK and Akamai Australia adopted on 27 May 2026). In the preparation of this joint statement, Akamai's ESG Office, Legal and Ethics & Compliance departments engaged and consulted with the reporting entities covered by this statement and the entities owned and/or controlled by Akamai Technologies Netherlands B.V. and Akamai UK do not own or control any other entities.



In accordance with the requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, signatories attest that they have reviewed the information contained in the report for the entities listed above. Based on their knowledge, and having exercised reasonable diligence, they attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above. All signatories have the authority to bind their respective entities.

Signed by:

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Liz Doherty

Chief Ethics & Compliance Officer

Akamai Technologies, Inc.

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Gerald Deck

Director

Akamai Technologies Netherlands B.V.

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

and

Akamai Technologies Limited.

(UK Co. Reg. No.: 03921701)

May 27th, 2026