

Modern Slavery and Human Trafficking Statement for FY2023

May 2024

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**”), Akamai Technologies Netherlands, B.V. (Australian Branch) (ABN: 52 115 435 955) (“**Akamai Australia**”) and Akamai Technologies Canada, Inc. (Business Number: 809091465) (“Akamai Canada”) for the fiscal year 2023.

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 62 subsidiaries (hereinafter collectively referred to as “**Akamai**”) and has offices in 48 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, 2023, we had over 10,250 employees worldwide, located in more than 30 countries and representing over 100 nationalities, which brings a diverse, inclusive, and global perspective to our operations. Around 0.9%, 2% and 1.6% of our global workforce are based in Australia, the United Kingdom and Canada 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 Connected Cloud, the fostering and maintenance of relationships with our customers and the management of our operations. The importance of our workforce to our success is

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



underscored by the inclusion of corporate mission critical goals centered on our employees. In 2023, we focused on fostering an inclusive community that supports the success of our employees and continuing 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 diversity and inclusion brings to the workplace. All qualified applicants for employment are considered fairly, and we do not tolerate discrimination on the basis of gender, gender identity, sexual orientation, race or ethnicity, protected veteran status, disability or other protected group status.

Akamai supports varied programs and practices designed to promote a diverse and inclusive working environment. We have nine 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. To help us improve the diversity of our workforce, we participate in or sponsor professional development and recruiting forums. We also train hiring managers to draft inclusive job descriptions intended to broaden the pool of eligible applicants.

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.

Akamai Operations

Since 1998, Akamai has developed and provided solutions for global enterprises to build, deliver and secure their digital experiences on our massively distributed worldwide network. This platform, which we refer to as Akamai Connected Cloud is comprised of an edge and cloud architecture and underlying network for cloud computing, security, and content delivery services. Akamai Connected Cloud provides us with 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 Connected Cloud offers solutions designed to protect our customers from threats and attacks, while empowering them to securely deliver digital experiences to engage, entertain, and interact with their customers. Akamai Connected Cloud also offers a continuum of computing designed to efficiently build, deploy and secure performant applications and workloads that require single-digit millisecond latency and global reach.

Today, billions of people work, learn, shop, bank, communicate and do more online globally. 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. Our strategy is to help continue to drive this transformation by offering compute, security and content delivery services on Akamai Connected Cloud that empower our customers to compete and operate with the scale, resilience and efficiency that their businesses demand.

We provide solutions in three core offerings: security, content delivery and compute. We also provide services and support for our customers as they utilize our core solutions.

We market and sell our solutions globally through our direct sales and services organization and through many channel partners including AT&T, Avant, BV Tech, Carahsoft, Deutsche Telekom, Kyndryl, Microsoft Azure and , Telefonica Group. In addition to entering into agreements with resellers, we have several other types of sales and marketing focused alliances with entities such as system integrators, application service providers, referral partners, and 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 2023, Akamai engaged with more than 3,500 suppliers from 65 countries globally. Please find below the number of suppliers we engaged within the following countries:

Country	N° of suppliers	N° of countries
Australia	68	5
Canada	30	3
UK	184	12
US	749	47

Akamai's supply chain includes the suppliers of equipment needed to build and maintain the Akamai Connected Cloud, as Akamai does not manufacture any servers or related equipment. Our main server suppliers are located in the U.S., Canada and Mexico.

In addition, Akamai contracts with external vendors and suppliers that provide goods and services that relate chiefly to the provision of office space, information technology and professional services.

Akamai's major categories of spend include server equipment, real estate, energy and utilities, facility maintenance and repairs, payroll services, professional services (including legal and accounting services), information technology and telecommunications, travel and entertainment, courier and delivery, public relations, and marketing.

Our Policies

Akamai believes that respect for human rights is fundamental to unlocking the potential of the Internet and an essential value for our employees and the communities in which we operate. We are committed to providing an inclusive environment that is free from illegal and inappropriate behavior.

Akamai stands against the damaging effects of slavery, servitude, forced or compulsory labour, and human trafficking in societies around the world. We are committed to the principle that our employees – and those of our suppliers and contractors – should be treated with dignity and respect at all times.

Under our [Code of Ethics](#), Akamai employees are expected to report concerns – including those relating to modern slavery and human trafficking – and management is expected to act appropriately and in accordance with applicable laws in response to such reports. Concerns may be reported to supervisors, company management, or our Human Resources, Legal, and Global Ethics & Compliance departments. All employees are also able to report concerns through our confidential and independently hosted [Ethics Hotline](#), available online and via telephone.

Akamai has also developed a [Human Rights Policy](#) and [Supplier & Partner Guiding Principles](#) that address, among other things, modern slavery, human trafficking, and other labor abuses or human rights violations. These policies embody our corporate values and the international principles encompassed by:

- the Universal Declaration of Human Rights;
- the International Labor Organization's Declaration on Fundamental Principles and Rights at Work;
- the United Nations Global Compact; and
- the United Nations Guiding Principles on Business and Human Rights.

Risks of Modern Slavery Practices and Mitigation Procedures

Building and maintaining our network of servers is critical to Akamai's business, and Akamai purchases servers from external suppliers as we do not manufacture them internally. We recognize that potential human rights / modern slavery risks are associated with our server supply chain. Our server suppliers, which have manufacturing operations based in Canada, Mexico and elsewhere, are members of the [Responsible Business Alliance](#), a non-profit organization that has played a critical role in driving collaboration in the electronics industry, organizing activities around the common goal of promoting social, ethical, and environmental responsibility in the electronics supply chain.

Akamai routinely engages with our suppliers and vendors, and these relationships are reviewed regularly. Our suppliers and vendors are contractually required to comply with applicable laws and regulations and conduct themselves in a manner that is consistent with our [Code of Ethics](#), [Human Rights Policy](#) and [Supplier & Partner Guiding Principles](#). 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 diverse, environmentally and socially conscious, and responsible suppliers and partners. We look to partner with businesses that share our values, mitigate supply chain risks, promote diversity, inspire better business, and keep evolving with our corporate goals and Environmental, Social and Governance ("ESG") 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, we entered into a professional partnership with EcoVadis in 2022. EcoVadis is a trusted provider of business sustainability ratings. Serving a global network of more than 130,000 rated companies, it is considered one of the world's largest providers of such ratings. The EcoVadis sustainability assessment provides an evaluation of how well a company has integrated the principles of sustainability and corporate social responsibility ("CSR") into their business and management processes. Using the EcoVadis platform, we have collected details on the performance of participating suppliers in different key ESG focus areas. The EcoVadis methodology is built on international sustainability standards, including the Global Reporting Initiative, the United Nations Global Compact, and the ISO 26000 standard, covering more than 220 spend categories and over 180 countries. The EcoVadis Sustainability Scorecards for each participating supplier illustrate after performance across 21

indicators in four key ESG themes: environment, labor and human rights, ethics, and sustainable procurement.

By sharing their EcoVadis Sustainability Scorecards, suppliers provide insight into their ESG performance, which allows us to understand the ESG efforts of our suppliers and find places for improvement.

In our first campaign in collaboration with EcoVadis - initiated in October 2022 - we invited a total of 179 suppliers to participate in our RSCP. The initial invited suppliers represented a number of our top suppliers by spend (which represent about 70% of our current total annual supplier spend) as well as other suppliers who actively participate in the EcoVadis Scorecard system and thus were in a position to share their scorecard with us easily.

In 2023, we established a clear vision statement, goals, KPIs, and a refined governance structure for our Responsible Supply Chain Program. Our revised RSCP governance structure helps manage risks and define the roles and responsibilities of program participants.

In 2023, we invited 231 suppliers to participate in our RSCP – a 29% increase over 2022. In 2023 we targeted two main categories of suppliers and partners: strategic suppliers and partners, and higher-risk suppliers and partners. By the end of the campaign (i.e., January 31, 2024) we received scorecards for 122 suppliers or partners, or approximately 52.8% of those invited to participate in our 2023 campaign. The participation rate of strategic suppliers and partners in our 2023 campaign was 69.2%. We continue to work with the remaining suppliers to emphasize the importance of their participation. Overall, our rated suppliers score significantly better than the EcoVadis network-wide average of evaluated companies. According to our supplier dashboard within the EcoVadis platform, the average score of all of our rated suppliers is well above the EcoVadis network-wide average benchmark score.

To support continuous improvement, we work closely with our suppliers and partners to 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 [Supplier & Partner Guiding Principles](#). Our diligence program includes:

- undertaking due diligence procedures on prospective and existing partners/resellers;
- putting approved partners/resellers on notice of our expectations and [Code of Ethics](#);
- conducting periodic compliance reviews, using a risk-based approach; and
- encouraging the reporting of ethical concerns.

Training, Culture, and Accountability

Through the 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 established a dedicated ESG Office in February 2021 that provides a cohesive approach to ESG matters across Akamai, including on modern slavery and human trafficking. The ESG Office plays a crucial role in helping Akamai serve as a catalyst for positive, systemic change and positive impact for our customers, investors, employees, and communities. Continuing to foster a strong ESG governance structure, in 2024 Akamai also established an ESG Expert Committee with the primary function of providing subject matter expertise on individual ESG topics, advice, feedback and overall guidance, including on a responsible supply chain management.

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:** Fostering an inclusive, diverse, and equitable workplace and investing in the health, safety, and development of our employees
- **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: Working to create equitable access and a more inclusive technology sector while contributing to the communities in which we live and work through employee volunteerism, educational partnerships, disaster relief and crisis response.

Further information on what Akamai is doing in the ESG space can be found on Akamai's ESG website in the Akamai 2023 ESG Impact Report.

In early 2023, Akamai rolled out an 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 2023 was 97%.

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.

Some specific actions for 2024 will be to review the valid EcoVadis Sustainability Scorecards of our participating suppliers to understand their ESG efforts and follow up with low scoring suppliers in the area of modern slavery and human rights to find areas for improvement and request corrective actions if necessary.

We are also planning some specific trainings for key suppliers on human rights and modern slavery topics in 2024.

Signatures

This joint statement was prepared by Akamai’s ESG Office, Legal and Ethics & Compliance departments, and approved by Akamai Technologies, Inc., Akamai Technologies Canada, Inc., Akamai UK, and Akamai Australia (including by way of board resolutions of Akamai UK and Akamai Australia). 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. Akamai UK and Akamai Canada do not own or control any other entities.

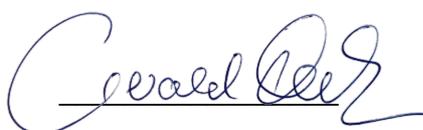
In accordance with the requirements of the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act, and in particular section 11 thereof, signatories attest that they have reviewed the information contained in the report for the entities listed above. Based on their knowledge, and 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.



Jeffrey Huang

Chief Ethics & Compliance Officer

Akamai Technologies, Inc.



Gerald Deck

Director

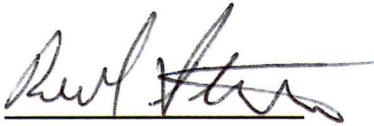
Akamai Technologies Netherlands B.V.

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

and

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(UK Company Registration No.: 03921701)



Rick Stevens

Director

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May 31, 2024