

# Modern Slavery and Human Trafficking Statement for FY2022

June 2023

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### Introduction

This statement is a joint statement made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 and the Australia Modern Slavery Act 2018 and constitutes the statement against modern slavery and human trafficking by Akamai Technologies, Inc., Akamai Technologies, Limited. (Company Reg. Number: 03921701) ("Akamai UK"), and Akamai Technologies Netherlands, B.V. (Australian Branch) (ABN: 52 115 435 955) ("Akamai Australia") for the fiscal year 2022.

# 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 60 subsidiaries (hereinafter collectively referred to as "**Akamai**") and has offices in 53 locations globally<sup>1</sup>. 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, 2022, we had over 9,800 employees worldwide, located in more than 30 countries and representing over 95 nationalities, which brings a diverse, inclusive, and global perspective to our operations. Around 1% and 2% of our global workforce are based in Australia and the United Kingdom respectively.

Our employees – our human capital – are our most valuable assets. It is our belief that an engaged employee base is critical to having a productive, ethical, and inclusive workplace needed to successfully and sustainably compete in today's marketplace.



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

The importance of our workforce to our success is underscored by the inclusion of corporate mission critical goals centered on our employees – in 2022 we focused on further developing an inclusive, diverse, productive, and flexible work environment by embracing the future of work, and on putting our culture and our purpose into action by applying a growth mindset to creatively and collaboratively solve our toughest challenges.

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.

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**

For 25 years, Akamai has developed and provided solutions to power and protect life online through our massively distributed worldwide network of servers. This platform, which we recently began referring to as the Akamai Connected Cloud is comprised of an edge and cloud architecture for cloud computing, security, and content delivery. The 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, the Akamai Connected Cloud offers solutions designed to protect our customers from threats and attacks, while empowering them to securely deliver their business as they engage, entertain, and interact with their customers; and extend their internal systems beyond their corporate perimeters to control access and better leverage the cloud by efficiently building, deploying, and securing performant workloads that require single-digit millisecond latency and global reach.

After multiple years of the COVID-19 pandemic, which shifted how millions of people work and communicate 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 categories: security, content delivery and compute. We also provide solutions for carriers and certain 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, Deutsche Telekom, Kyndryl, IBM, Microsoft, Orange Business Services and Telefonica Group. In addition to entering into agreements with resellers, we have several other types of sales and marketing focused alliances with entities such as system integrators, application service providers, referral partners, and sales agents. By aligning with these partners, we believe we are better able to market our solutions and encourage increased adoption of our technology throughout the industry. Our sales, services, and marketing professionals are based in locations across the Americas, Europe, the Middle East, and Asia-Pacific and focus on direct and channel sales, sales operations, professional services, account management, and technical consulting.



#### Akamai Supply Chain

During the fiscal year 2022, Akamai engaged with more than 5,000 suppliers from 140 countries globally. In Australia, we engaged with 107 suppliers (from 6 countries). In the UK, we engaged with 236 suppliers (from 18 countries).

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 <u>Code of Ethics</u>, 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 <u>Human Rights Policy</u> and <u>Supplier & Partner Guiding Principles</u> 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 <u>Code of Ethics</u>, <u>Human Rights Policy</u> and <u>Supplier & Partner Guiding Principles</u>. 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 seeks to ensure a responsible supply chain by working with diverse, environmentally, and socially conscious, and responsible suppliers. Akamai's Responsible Supply Chain Program ("RSCP") is designed to encourage our suppliers and vendors to align with, 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 100,000 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 200 spend categories and over 175 countries. The EcoVadis Sustainability Scorecards for each participating supplier illustrate 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 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 <u>Code of Ethics</u>, <u>Human Rights Policy</u> and <u>Supplier & Partner Guiding Principles</u>. 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 <u>Code of Ethics</u>, 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.



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

• <u>Sustainability</u>: Improving our energy efficiency and reducing our environmental footprint — and that of our partners — to minimize our impact on biodiversity and society

• <u>Our People</u>: Fostering an inclusive, diverse, and equitable workplace and investing in the health, safety, and development of our employees

• <u>Responsible Business Practices</u>: Continually refining our corporate governance policies, building a responsible supply chain, and operating our business ethically

• <u>Data Privacy and Security</u>: Committing to robust and cutting-edge data security, privacy best practices and customer protection

• <u>Akamai Foundation</u>: 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 in the <u>Akamai</u> <u>2022 ESG Impact Report</u>.



# **Next Steps**

End of 2022 Akamai developed a 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 has been rolled out in early 2023 and it 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. During this year we will be closely monitoring completion of the training by this group.

We will also be reviewing 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.



## 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 (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 control by Akamai Technologies Netherlands B.V. Akamai UK does not own or control any other entities.

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