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Sae Park, Acting CFO  
Internet Society  
Reston, VA

27 January 2022

## **Report on IETF Administration LLC Compliance Program**

Dear Sae

Section 11.viii of the Limited Liability Agreement of IETF Administration LLC sets out the following obligation on the company:

"Develop a compliance program, reasonably acceptable to Member's CFO or the CFO's delegate, with a goal of ensuring compliance with applicable laws, rules and regulations (including without limitation laws governing bribery, anti-terrorism sanctions, export controls, and data protection/privacy and other legal regimes applicable to United States entities with global operations) and report to Member annually on such program."

Our annual report for 2021 is as follows:

1. We have consulted on and published a set of policies addressing the areas listed above.

<https://ietf.org/about/administration/policies-procedures/>

2. We have a process in place to request, assess and publish COI disclosures from key personnel and contractors.

<https://ietf.org/about/administration/policies-procedures/conflict-interest/coi-disclosures/>  
<https://ietf.org/about/administration/rfps/>

3. We have a whistleblower hotline and online reporting system, through which anyone can report a concern.



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<https://ietf.ethicspoint.com>

4. We have an OFAC Compliance policy in place, which was actively invoked in 2021, and counsel maintain a close watch on ongoing developments.

[https://www.ietf.org/media/documents/IETF\\_LLC\\_OFAC\\_Compliance\\_Policy\\_2020-10-06.pdf](https://www.ietf.org/media/documents/IETF_LLC_OFAC_Compliance_Policy_2020-10-06.pdf)

5. We have a Privacy Statement for the IETF/IRTF/IAB, introduced following community consultation, and signed off by independent privacy counsel.

<https://ietf.org/privacy-statement/>

6. Our counsel have developed a formal employment checklist and all items on that checklist have been met for all employees to ensure that we are fully compliant with employment laws.

7. Our counsel have prepared a compliance training video to assist with the reading of our policies.

<https://www.youtube.com/watch?v=scL7oqpHfD4>

8. Concerns have been raised about our antitrust exposure by both a counsel representing one of our participants and ISOC. While the current antitrust position of the IETF is long-standing and well supported within the community, we have started to engage the IETF community on possible policy options, and have commissioned a review of our current position and possible options from specialist antitrust litigation counsel.

9. No compliance issues have been raised with the LLC Board or Management.

Please let me know if you have any questions.

Yours sincerely,



**I E T F**<sup>®</sup>

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A handwritten signature in black ink that reads "Jay Daley". The signature is written in a cursive, flowing style.

Jay Daley, IETF Executive Director

cc: IETF LLC Board, Brad Biddle, Ilona Levine