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Sae Park, CFO  
Internet Society  
Reston, VA

30 January 2023

## **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 2022 is as follows:

1. We have a published 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 2022. Counsel maintain a close watch on ongoing developments and this policy is regularly reviewed.

[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. In response to a request from the Internet Society that the IETF develop an antitrust policy, we engaged specialist antitrust counsel to examine our antitrust exposure and to advise on the need for any further policies or other measures to strengthen our position. They concluded that our current position is strong, based on the existing policies, and no further strengthening was necessary. Their advice supported our existing plans to produce
  - a. An informational RFC (assuming community consensus can be obtained) setting out how our existing policies provide a robust antitrust position and providing informational guidance for participants. This work is progressing.



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- b. Training for IETF leadership positions. This was first delivered in-person to Working Groups chairs at IETF 115 London and work is underway on a video version.
9. No compliance issues have been raised with the LLC Board or Management.

Please let me know if you have any questions.

Yours sincerely,

A handwritten signature in black ink that reads "Jay Daley".

Jay Daley, IETF Executive Director

cc: IETF LLC Board, Brad Biddle, Ilona Levine