



Making the Internet work better

Sandy Spector, CFO
Internet Society
Reston, VA

16 December 2020

Report on IETF Administration LLC Compliance Program

Dear Sandy

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 2020 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 a specific OFAC Compliance policy in place and counsel maintain a close watch on ongoing developments.

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 are preparing a compliance training video due to be rolled out to key individuals before the end of the year.
8. No compliance issues have been raised with the LLC Board or Management.

Please let me know if you have any questions.

Yours sincerely,

Jay Daley, IETF Executive Director

cc: IETF LLC Board, Brad Biddle, Ilona Levine