



Making the Internet work better

Sae Park, CFO
Internet Society
Reston, VA

9 January 2025

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 2024 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. 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_2022-09-26.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 2024 the IETF community reached consensus on an Informational RFC providing education and guidance for IETF participants on compliance with antitrust laws and how to reduce antitrust risks in connection with IETF activities. This is published as RFC 9680 "Antitrust Guidelines for IETF Participants"

<https://www.rfc-editor.org/rfc/rfc9680.html>

Following the publication of this RFC, the training presentation/video is being reviewed for reintroduction in 2025.

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



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Please let me know if you have any questions.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Jay Daley". The signature is written in a cursive, flowing style.

Jay Daley, IETF Executive Director

cc: IETF LLC Board, Vigdis Bronder, Ilona Levine