



Making the Internet work better

Sandy Spector, CFO
Internet Society
Reston, VA

19 March 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."

This is notification that we now have all the elements of this compliance program in place and so can issue our first annual report, 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/>



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3. At the end of this week we will be announcing our whistleblower hotline and online reporting system, through which anyone can report a concern.

<https://ietf.ethicspoint.com>

4. We have taken legal advice on export controls and the work of the IETF and are satisfied that we are operating legally. Our counsel maintain a close watch on ongoing developments.
5. We have introduced a new Privacy Statement for the IETF/IRTF/IAB, following community consultation, that has been 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. 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, David Frolio