

ICANN CONFLICT OF INTEREST ENFORCEMENT AND COMPLIANCE REPORT
5 JANUARY 2015

Pursuant to Section C.6 of contract SA1301-12-CN-0035 between the U.S. Department of Commerce and the Internet Corporation for Assigned Names and Numbers (ICANN), the following report has been developed and published as required

Section C.6.1 – ICANN maintains a written, enforced conflicts of interest policy in accordance with Section C.6.1 of the contract. This policy is distributed to all applicable parties at the time of engagement (e.g., hire) and is redistributed on an annual basis.

Section C.6.2 – ICANN has appointed a Conflict of Interest Officer (COIO) as required by Section C.6.2. The COIO is Steven Antonoff – Director of Human Resources Operations.

Section C.6.2.1 – The COIO has ensured distribution of the conflict of interest policy to all employee's, directors and subcontractors upon their election, re-election or appointment and annually thereafter in compliance with Section C.6.2.1 of the contract.

Section C.6.2.2 – The COIO has ensured that each of ICANN's employees, directors and subcontractors has completed a certification with disclosures of any known conflicts of interest upon their election, re-election or appointment, and annually thereafter. Each certification is reviewed by the COIO to determine if there are any disclosures of known conflicts of interest and what actions, if any, need to be taken based on any disclosed known conflicts of interest. The COI ensures a record is kept of the date each certification is received back and reviewed.

Section C.6.2.3 – The COIO has required that each of ICANN's employees, directors, and subcontractors promptly update the certificate to disclose any interest, transaction, or opportunity covered by the conflict of interest policy that may have arisen during the annual reporting period.

Section C.6.2.4 – This report is published in accordance with Section C.6.2.4. There are no major events, problems encountered, or changes related to Section C.6 to report.

Section C.6.2.5 – In accordance with Section H.5 [sic] {Section H.9}, ICANN warrants that, to the best of ICANN's knowledge and belief, it has not received or otherwise been exposed to any nonpublic source selection or competing contractor information, and there are no relevant facts or circumstances which would give rise to an Organizational Conflict of Interest (OCI). To the best of ICANN's knowledge and belief, there are no impediments to ICANN's ability to do the following: (i) render impartial assistance or advice; or (ii) objectively perform work under the contract. Further, to the best of ICANN's knowledge and belief, there is nothing that would provide ICANN with an unfair competitive advantage because of access to non-public government information. Moreover, there is nothing in the statement of work in the solicitation that would entail access to proprietary information of a competing contractor.