

ICANN CONFLICT OF INTEREST ENFORCEMENT AND COMPLIANCE REPORT
5 JANUARY 2016

Pursuant to Section C.6 of IANA Functions Contract SA1301-12-CN-0035 between the U.S. Department of Commerce and the Internet Corporation for Assigned Names and Numbers (ICANN) (Contract), 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 for the Contract. The policy is distributed to all applicable parties at the time of engagement (e.g., start date) 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 of the Contract. The originally designated COIO was Steve Antonoff – Director of Human Resources Operations. Mr. Antonoff has left ICANN effective 2 July 2015. ICANN has designated Amy Stathos, Deputy General Counsel, to serve as the COIO, and who is currently serving as acting COIO pending confirmation from NTIA.

Section C.6.2.1 – The acting COIO has ensured distribution of the conflict of interest policy to all employees, 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 acting COIO has taken all steps necessary to ensure 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 acting COIO, or other appropriate party depending on who has made the disclosure, 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 acting COIO is responsible for ensuring a record is kept of the date each certification is received back and that each is reviewed.

Section C.6.2.3 – The original COIO and the acting COIO have 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 arises during the annual reporting period. Appropriate reminders regarding reporting and compliance are sent out during the annual reporting period.

Section C.6.2.4 – This Report is published in accordance with Section C.6.2.4. No major events have occurred, no problems were encountered, and there are no changes related 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. 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 IANA

Functions 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.