

# **Human Rights Policy**

Cloudflare's mission is to help build a better Internet. Our goal is to keep striving to make the Internet itself better — always on, always fast, always secure, always private, and available to everyone.

We believe a better Internet is built on human rights, and that human rights should inform how we do business. This policy describes our human rights commitments, the way we implement those commitments, and oversight of this policy.

## Scope

This policy applies to all of Cloudflare's employees, officers, directors, as well as its consultants, agents, contractors, business partners and any other representatives acting on behalf of Cloudflare. Cloudflare requires all employees to read, understand, and comply with this policy.

### **Commitments**

Cloudflare is committed to respecting human rights under the <u>United Nations (UN) Guiding Principles</u> on Business and Human Rights (UNGP).

The strength of international human rights is that they apply equally, to all people, everywhere. Cloudflare's human rights commitments are based on those rights defined by the United Nations as universal. Specifically, this includes all rights and freedoms included in the following:

- Universal Declaration of Human Rights(UDHR)
- International Covenant on Civil and Political Rights (ICCPR)
- International Covenant on Economic, Social and Cultural Rights
- International Labor Organization's (ILO) Fundamental Principles and Rights at Work

Additionally, Cloudflare's commitment to help protect and advance freedom of expression and privacy online is based on:

freedom of expression under <u>Article 19 of the UDHR</u> and <u>Article 19 of the ICCPR</u>, privacy under Article 12 of the UDHR and Article 17 of the ICCPR, as well as the <u>GNI Principles</u> and <u>Implementation Guidelines</u>.

As a signatory of the <u>UN Global Compact</u>, Cloudflare is committed to the <u>UN Ten Principles</u>, as well as helping to promote human rights as part of advancing the <u>UN Sustainable Development Goals</u>.

# Implementing Cloudflare's Commitments

Cloudflare's commitment to respect human rights under the UNGPs means that we will seek to avoid causing human rights harms and work to mitigate any human rights harms with which we are involved. More specifically, the commitment means evaluating whether Cloudflare's actions cause or contribute to an adverse impact on human rights.

We take a number of concrete steps to comply with our commitments.

- Conducting due diligence. Cloudflare uses human rights impact assessments and other human rights due diligence tools to identify, prevent, mitigate, and account for how we address adverse human rights impacts.
- Respecting the privacy of personal data. As laid out in our privacy policy, Cloudflare believes the protection of our customers' and their end users' data is fundamental. We require that any government requests for data strictly adhere to due process of law and be subject to judicial oversight. We build products to expand and improve privacy online, and we minimize our collection of personal data and only use personal data for the purpose for which it was collected. Since our founding, we have committed that we would keep personal information private, so we have never sold or rented our users' personal information to anyone.
- Respecting our employees. As reflected in the Cloudflare Guidebook and our employment
  policies, Cloudflare is committed to building a diverse, inclusive, and equitable workplace that
  respects the rights of our employees, particularly those rights covered under the ILO Declaration
  on Fundamental Principles and Rights at Work and the UN Global Compact.
- Addressing abuse. Cloudflare accepts and responds to complaints about use of our network, as outlined in our abuse process. That process outlines our commitment to help address abuse in an appropriate and proportional manner given the nature of the services being used.
- Being transparent. Cloudflare publishes semi-annual <u>Transparency Reports</u> that describe legal requests for personal information and removal or blocking of content. Cloudflare also maintains a <u>public list</u> of actions it has never taken, including providing encryption keys or access to its network to government entities.
- Assessing our supply chain. Cloudflare takes steps to evaluate our business partners, resellers, suppliers, and vendors for compliance with legal and ethical policies and standards, including fair employment practices. We <u>abide</u> by all applicable anti-slavery and human trafficking laws, including the U.K. Modern Slavery Act of 2015 and Australia's Modern Slavery Act of 2018.
- **Supporting Human Rights Defenders.** Consistent with the UN Declaration on Human Rights Defenders, Cloudflare seeks to protect vulnerable human rights advocates, journalists, and others who seek the promotion and protection of civil and political rights through programs like Project Galileo.

# **Working with Stakeholders**

Effectively implementing the UN Guiding Principles requires consulting with communities and individuals who might be affected by our activities. Cloudflare will work with civil society representatives and other relevant stakeholders to identify and document oursalient human rights issues, and to mitigate any harms with which we are involved.

Cloudflare is committed to engaging with civil society experts, academics, partners and other technology companies to help protect and advance freedom of expression and privacy online through the <u>Global Network Initiative (GNI)</u>. Cloudflare also participates in consultations with the <u>United Nations B-Tech Project</u> as part of its technology and human rights working group. As part of these initiatives, Cloudflare works to implement its human rights commitments, including developing strategies to engage governments on important human rights issues.

# **Policy Development and Oversight**

Cloudflare's Human Rights Policy was published in 2021. It was approved by Cloudflare's Global Head of Public Policy, General Counsel, and CEO. Policy implementation is overseen by our Global Head of Policy, General Counsel, CEO, and Board of Directors.

All new Cloudflare employees will receive training on this policy and Cloudflare's human rights commitments beginning in late 2021.

As part of Cloudflare's commitment as a signatory of the UN Global Compact, Cloudflare will publish updates on its human rights achievements relative to the UN Ten Principles and UN Sustainable Development Goals as part of its annual UNGC Communication on Progress.

In addition, as members of GNI, Cloudflare will undergo regular internal and third-party assessments of its implementation of the GNI Principles and Implementation Guidelines beginning in 2022 and 2023 respectively.

#### **REPORT**



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