



AL-ALAC-ST-0525-01-EN

ORIGINAL: English

DATE: 14 July 2025

STATUS: Ratified

AT-LARGE ADVISORY COMMITTEE

Updated ICANN Community Participant Code of Conduct Concerning SOIs

Preamble

On 12 May 2025, the Public Comment proceeding opened for the Updated ICANN Community Participant Code of Conduct concerning SOIs. An At-Large workspace was created in preparation for this Public Comment submission. The At-Large Operations, Finance and Budget working group (OFB-WG) reviewed the public comment title and decided it would be in the interest of end users to develop and submit an ALAC Public Comment Statement.

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Ratification Record

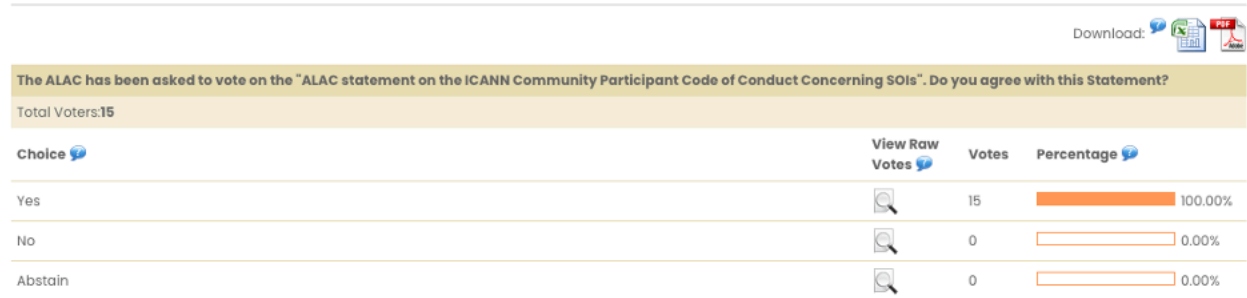
On 12 May 2025, the Public Comment proceeding opened for the Updated ICANN Community Participant Code of Conduct Concerning SOIs. On 22 May 2025, Satish Babu, Judith Hellerstein, Eunice Alejandra Pérez Coello, Michel Tchonang, and Nkoro Essang Nkoro discussed the comments for the ALAC statement during the Operations, Finance and Budget Working Group (OFB-WG) call. The At-Large OFB-WG decided it would be in the interest of end users to develop and submit an ALAC statement for this Public Comment proceeding. Eunice Alejandra Pérez Coello and Judith Hellerstein volunteered to draft the initial ALAC statement for OFB-WG consideration and ALAC endorsement.

On 26 June 2025, the initial draft statement was shared with the Operations, Finance, and Budget Working Group OFB-WG for review and input. On 10 July the At-Large Public Comment Statement was finalized. The ALAC Chair, Jonathan Zuck, requested that the Public Comment Statement be ratified by the ALAC before submission to the ICANN Public Comment feature.

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On 14 July 2025, staff confirmed the online vote resulted in the ALAC endorsing the statement with 15 out of 15 votes in favor. 0 votes against, and 0 abstentions. Please note 100% of ALAC members participated in the poll. The ALAC members who participated in the poll are (alphabetical order by first name): Aziz Hilali, Bukola Oronti, Claire Craig, Emilia Zalewska-Czajczynska, Eunice Alejandra Perez Coello, Jonathan Zuck, Judith Hellerstein, Justine Chew, Kathleen Scoggin, Lilian Ivette De Luque, Natalie Tercova, Pari Esfandiari, Raihanath Gbadamassi, Satish Babu, Shah Zahidur Rahman. You may view the results here:

Results by Question



ALAC and At-Large Community Comments

The At-Large Advisory Committee (ALAC), in representing the views of the At-Large community, appreciates the opportunity to comment on the Updated ICANN Community Participant Code of Conduct concerning Statements of Interest (SOIs). We find the updated ICANN Community Participant Code of Conduct Concerning Statements of Interest (Code) to be a vital step forward. At-Large/ALAC has always championed transparency and accountability, seeing them as the bedrock of ICANN's unique multistakeholder model. The ALAC/At-Large supports the overall goal of enhancing transparency and accountability. However, we offer the following comments and recommendations to ensure that the updated Code is inclusive and equitable across ICANN's diverse community structures. ALAC/At-Large feels that the updated Code broadens what counts as an "interest" that needs to be disclosed (covering both money-related and non-money-related influences), we think a bit more detail would help everyone. Some examples are a better definition of what the term **"Tiny Ownership" means?**

1. Ensuring Participation Despite Disclosure Challenges

The updated Code prohibits individuals from participating in ICANN processes or sessions if they have not submitted a complete SOI. We support the need for increased and strengthened transparency and enhanced accountability, but this may unintentionally exclude participants from the At-Large community, especially newcomers, who may face challenges due to unfamiliarity with ICANN terminology, digital tools, or procedural expectations. ALAC/At-Large recommends increased training on what to include in the SOI, with better and more relevant examples tailored to community realities. ALAC/At Large also believes that there should be

standardization of each of the SOIs to enhance inclusion. In each section of the SOI, Staff can provide examples of what type of information should be included in each section. This way, participants filling out multiple SOIs for each constituency will know what to include.

A lack of clarity may discourage participants (volunteers) representing grassroots users or underrepresented regions unfamiliar with legal or institutional norms from participating. Such exclusion undermines At-Large's mission to ensure inclusive, diverse, and effective end-user representation within ICANN's multistakeholder model.

Clear Deadlines for Updates:

The Code states there should be "deadlines specified to guide the timeliness of submitting or updating a statement of interest". The ALAC/At Large believes these deadlines should be clearly outlined and, where possible, standardized across different ICANN processes. This ensures consistency and prevents disclosures from being perpetually open-ended.

The ALAC/At-Large feels that the examples provided by ICANN were not as relevant to some communities and made it more difficult for At-Large users to create higher-quality SOIs that meet the guidelines set out. It would be useful to add concrete cases adapted to the reality and diversity of the ALAC/At-Large community. For example, ALAC and selected At-Large participants attending ICANN public meetings as supported travelers do so purely as volunteers. Additional examples could include participants serving as volunteer trainers or mentors, academics whose research is funded by third parties, individuals contributing across multiple working groups with intersecting interests, or community members receiving pro bono assistance. These scenarios reflect common forms of engagement in At-Large and should be acknowledged as legitimate non-financial interests to be disclosed proportionally.

At-Large/ALAC participants participate in a volunteer capacity, this support should not be misinterpreted as a financial conflict of interest or grounds for exclusion. Clarifying this in the Code would help prevent confusion and reinforce the need for more community-relevant examples.

To this end, ICANN could encourage the regular updating of SOIs with examples that are better adapted to the varied contexts of members. This would enable At-Large members, for example, to better express their multiple roles while maintaining essential transparency.

2. Supporting New and Less Experienced Participants in Disclosure Compliance

The revised Code imposes stricter disclosure requirements and prohibits participation in ICANN processes when those disclosures are incomplete or missing. This may unintentionally exclude At-Large members, especially from underrepresented regions or those with limited experience in formal policy environments. Such exclusion undermines At-Large's mission to ensure inclusive, diverse, and effective end-user representation within ICANN's multistakeholder model.

The ALAC/At-Large believes that ICANN's Code of Conduct should be supported by regular training initiatives, developed within community structures such as At-Large, to ensure accessibility and understanding. Such training would clearly explain the obligations associated with Statements of Interest (SOIs) and would also aim to reinforce a genuine culture of transparency within the community. These materials may be localized or multilingual when appropriate, as part of At-Large's internal capacity-building efforts, while respecting ICANN's working language.

Incomplete or misunderstood disclosures may be perceived as ethical lapses; as such the updated Code should clearly define what it means by "interest." For example, we seek some clarity on what constitutes a relationship with ICANN. Many of the At-Large staff are volunteers and are also supported by ICANN to travel to meetings; as such, they receive funding from ICANN, as do other supported travellers, but this funding should not be construed as having a relationship or being employed by ICANN. As such, we seek clarity on this issue and other issues. Additionally, it would be helpful to distinguish between participants who act in a formal representative capacity on behalf of an organization, and those who, while affiliated with a group, contribute based on their own expertise or experience. Making this distinction explicit would help avoid excessive or unnecessary disclosures and support a more proportional approach to transparency.

The updated Code expands requirements for disclosing familial, financial, professional, and representational interests without clear examples of what constitutes "Interests," . ALAC/At-Large recommends the inclusion of plain-language explanations, example scenarios tailored to non-commercial participation, and orientation resources to help newcomers navigate disclosure obligations. This could include examples involving community mentors or trainers, academics conducting externally funded research relevant to ICANN policies, pro bono legal assistance offered to community members, or volunteers engaged in multiple working groups. These scenarios reflect legitimate, non-financial forms of influence that should be transparently acknowledged without discouraging participation.

In addition to compliance, the updated Code should promote a culture of community learning. Regular, accessible training sessions can help members better understand SOI obligations while reinforcing transparency across ICANN structures. This also supports the principle of continuous disclosure, where the responsibility to maintain up-to-date SOIs lies with each participant rather than solely with meeting organizers. The ALAC/At-Large also supports the provision of clear guidance and practical tools for volunteer leaders responsible for supporting SOI compliance. Offering consistent training and interpretative support would help ensure fair and uniform application of the Code across different community groups. In situations where a group chair is unable or unwilling to act upon a disclosure issue, the Code should outline an escalation pathway that allows for community concerns to be addressed transparently and fairly, while respecting the autonomy of individual structures.

ALAC/At-Large suggests that on each policy call, participants should be reminded to make sure that their SOIs are up to date. The ALAC/At-Large recommends that ICANN provide operational support and tools to assist community structures in meeting this expectation.

End-User Impact

At-Large/ALAC is mandated to represent the interests of Internet end users globally, especially those from underrepresented regions and marginalized communities. The updated Code, if implemented without adequate safeguards, may hinder their ability to engage meaningfully in ICANN processes.

Many end-user representatives participate as volunteers and may lack the institutional knowledge, legal fluency, or access to reliable digital tools and platforms needed to comply easily with detailed SOI obligations.

To fulfill ICANN's Bylaws Article 1.2(b)(ii)—which calls for broad, informed, and culturally diverse participation—the Code must prioritize equity alongside transparency. Applying the Code as a facilitative, community-enabling instrument will help ensure that ICANN continues to benefit from authentic end-user perspectives.