

Speak Up Policy

Table of Contents

Introduction Chart	03
Why is Speaking Up important? What if I just have a question? Why should I get involved?	04
How do I encourage Speaking Up as a manager? What concerns are covered by this Speak Up policy?	05
Our Anti-Retaliation Policy Our Reporting Policy & How to Speak Up	06
Is it possible to report anonymously? What kind of information do I need to provide?	07
What should I do if I don't have all the facts? What can I expect after I Speak Up? Who acts on my concerns and how?	08
Does my report really remain confidential? Will my report be handled fairly and transparently if I Speak Up?	09
How does an investigation work? Things to remember about investigations	10
What is expected of me in connection with an investigation? What happens after an investigation is concluded?	11
What happens if this policy is misused? What if I have additional questions? External Misconduct Reporting	12



Why is speaking up important?

Because we always strive to do the right thing. Our customers and employees trust us. We earned that trust because we have high standards, and we expect everyone at GoDaddy¹ to uphold them. So, if you hear or see something that conflicts with our policies or values, speak up. “Speak up” means communicating with us in whatever way works best for you. GoDaddy is a safe place. We do not tolerate retaliation for reporting concerns made in good faith. By reporting suspected misconduct, you give us the opportunity to investigate the matter and address issues. Not raising potential possible misconduct may worsen a situation and undermine trust.

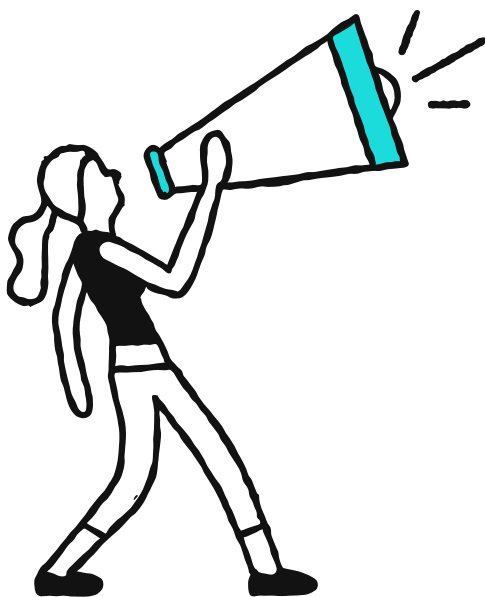
¹GoDaddy, or Company, is GoDaddy Inc. and its subsidiaries and affiliates.

What if I just have a question?

This Speak Up policy also covers questions! All reporting channels outlined in this policy can be used to ask for clarification on any GoDaddy policy or whether a situation might constitute misconduct.

Why should I get involved?

We recognize raising concerns may not be easy and it can sometimes feel simpler not to get involved. However, we’re all tasked to Be A Guardian and protect the Company, our customers, and each other. We cannot address concerns we don’t know about.



How do I encourage Speaking Up as a manager?

Building a safe environment also requires managers to Listen Up. Reporting a concern can be a stressful experience and managers should be supportive. That starts with listening and being fully present in conversations. Managers are also expected to act as role models and encourage their teams to act with high integrity and respect at all times.

What concerns are covered by this Speak Up policy?

Any suspected violation of our Code of Business Conduct and Ethics, and Company policies or criminal offenses. Examples include: Discrimination or harassment; conflicts of interest; disclosure of confidential information; improper use of Company resources; health, environmental and safety concerns; inadequate financial or non-financial recordkeeping; violations of competition laws or rules; insider trading; fraud; human rights violations; money laundering or violations of sanctions laws; bribery; retaliation against anyone for speaking up in good faith; or violations of any other GoDaddy policy.

Do not use this policy to:

- Report events presenting an immediate threat to life or property. If you need emergency assistance, please contact your local authorities or call your country's emergency services phone number.
- To make accusations that you know are false. Doing so may lead to disciplinary measures.



Our Anti-Retaliation Policy

GoDaddy prohibits retaliation against any employee for reporting or participating in an investigation of a possible violation of Company policy or unlawful conduct in good faith. “In good faith” means the person making the report actually believes or perceives the information reported to be true. That person does not have to be correct as long as they are acting in good faith.

Prohibited acts of retaliation include, but are not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make internal employment recommendations impartially, shunning or adversely affecting working conditions or otherwise denying any employment benefit to an employee because they have reported a violation or participated in an investigation into a suspected violation in good faith. If an employee engages in retaliation in violation of this policy, their behavior is not aligned with GoDaddy’s values and is deemed not to have taken place within the course and scope of employment with GoDaddy.



Our Reporting Policy & How to Speak Up

How can I Speak Up?

As a general guideline, often the best way to get your concerns addressed quickly and directly is to reach out to your direct manager, leader, or People Operations in person, by telephone, or via electronic communications. You can also reach out to any manager or leader at the Company with your concerns. However, if you don’t feel comfortable using these reporting channels or would like to consider reporting anonymously, you can also report through the channels below. If you Speak Up through any of the reporting channels below, we will listen, review your concern, and conduct a prompt, thorough, and impartial investigation, if necessary.

Reports may be made through GoDaddy’s third-party helpline provider online at www.godaddy.com/ethicshelpline or by phone at 1-800-461-9330 in the U.S. or the applicable country telephone number as instructed by the helpline. If local country laws prohibit certain reports via a helpline, the helpline provider will give instructions on how and to whom to report a particular concern. The helpline is available 24 hours a day, 7 days a week and accommodates multiple languages.

EMAIL

You can also send an email directly to the Compliance department at compliance@godaddy.com.

Is it possible to report anonymously?

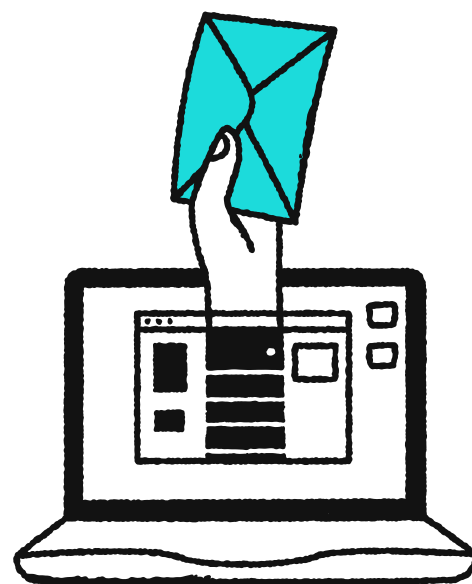
When using our ethics helpline or submitting an online report, you always have the option of remaining anonymous (where permitted by the laws of your country). We do, however, encourage reports to include identities because it is much more difficult, and in some circumstances even impossible, to properly or thoroughly investigate anonymous reports.

Information reported through these channels is, to the extent possible, kept confidential and only shared on a need-to-know basis with Compliance, People Operations, or Legal.

What kind of information do I need to provide?

A report can only be thoroughly investigated if it contains sufficient information. When you report suspected misconduct, please provide as much information as possible, including details such as: the background, history, and reason for the concern; names/witnesses, dates, places, times, and other relevant information; and any documents that may support your report.

Note that some countries have their own rules on 'speaking up' and 'whistleblowing'. In those locations you have the choice of speaking up through this policy or any other channel which may be specified in your local handbook or policies. Please check the handbook or policies in your country to determine if there are additional options or approaches in your home country and, in the event of doubt, please check with compliance@godaddy.com



What should I do if I don't have all the facts?

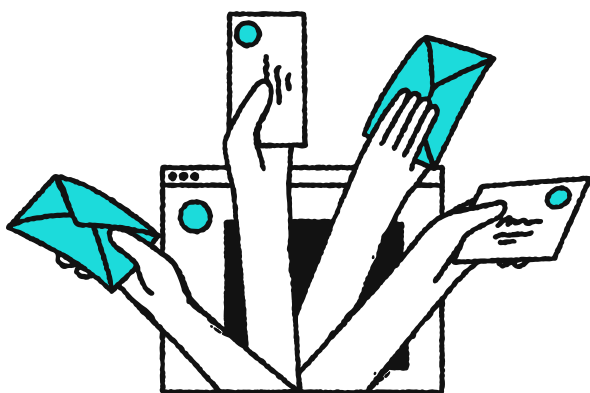
We encourage you to Speak Up as soon as possible. It is always better to discuss a situation upfront than to report afterwards. Memories also fade over time. If you know about or suspect misconduct, Speak Up with the information you have. We do not expect you to have all the answers. Our investigations teams will look into the matter to determine if there is a reason for concern. Never investigate the matter yourself and do not seek evidence yourself in an effort to build a case. No disciplinary measures or other steps will be taken against you if your good faith concern later turns out to be mistaken.

What can I expect after I Speak Up?

GoDaddy takes every report of possible misconduct seriously. If you submit a report, you will receive confirmation of receipt within 1 to 3 business days. Unless the circumstances of your report require immediate intervention, your report will undergo an initial review, and if appropriate, it will be investigated. You will be informed of the progress and contacted once the issue has been resolved. Please note that we will not be able to give you full details of the outcome of a case (or related actions taken) for reasons of confidentiality, privacy, and the legal rights of all parties involved.

Who acts on my concerns and how?

Based on the nature of your concerns, specific departments such as People Operations, Legal, Internal Audit, and Information Security may be assigned to conduct an investigation. Depending on the seriousness of the allegation, level at which it may have occurred, and internal departments' bandwidth, external parties (for example, law firms) may be retained to conduct the investigation.



Does my report really remain confidential?

When you Speak Up, your concern is treated with confidentiality. This means that any information you provide will only be shared with a limited number of people on a strict need-to-know basis in order to properly investigate the report or to take remedial actions. Information, including the identities of reporters and witnesses, will only be disclosed outside this small group of people if we are required to do so by law or an important public interest is at stake.

Will my report be handled fairly and transparently if I Speak Up?

All suspected misconduct reports and resulting investigations will be conducted in an independent, fair, and unbiased manner with respect to all parties involved and in accordance with relevant laws and principles. Details of the case, your identity, and the identity of anyone else mentioned in the report are kept confidential throughout and after the investigation and are only shared on a need-to-know basis. For certain types of concerns, including retaliation, discrimination, harassment, and hostile workplace, we take other steps to ensure the safety, health, emotional well-being, and the ability to work of all involved, but especially those that Speak Up on these concerns. You can also request that investigators provide an update at any time during the investigation.



How does an investigation work?

Our investigation process typically follows six main steps, unless circumstances require otherwise:

1. INTAKE

Questions or concerns come in through any of the reporting channels outlined in this policy.

2. ASSESS & ASSIGN

The People Operations, Legal or Compliance Department will review the report to determine if an investigation is necessary and if applicable, assign the matter to an investigator.

3. INVESTIGATE

The assigned investigator will conduct background research and interview participant(s) with empathy and care. Reporters and subjects of the investigation will be able to discuss the matter with the investigator and provide information or documentation separately. Investigators may request additional information, but there is no obligation to do so.

4. REPORT

The investigator will analyze their findings and determine if a violation of policy or Code of Business Conduct & Ethics has occurred.

5. ALIGN & ACTION

The investigator will share the investigation report findings and recommendations with need-to-know partners for any necessary remedial actions.

6. CLOSE

The investigator will close the case and inform the reporter that the case is closed.

Things to remember about investigations

- To maintain the integrity of the investigative process, we ask that you keep the details of the investigation confidential.
- You should not attempt to influence the investigation by trying to persuade others to support a particular viewpoint.
- You are also prohibited from altering, destroying or removing any information or documentation relating to the issues that you know or believe may be relevant.
- At the conclusion of the investigation, you may or may not be included in any review of the findings. What we share is limited and may vary by your involvement.



What is expected of me in connection with an investigation?

If you are involved in an investigation, we expect you to cooperate and answer all questions completely and honestly. Providing untruthful or misleading statements (including those that are only partially truthful) or purposely omitting relevant facts can lead to disciplinary measures. Improperly or unduly interfering with or influencing an investigation or refusal to cooperate in good faith can also result in disciplinary action. All parties involved, including the accused, will be treated with the highest level of confidentiality possible under the circumstances.

What happens after an investigation is concluded?

At the conclusion of the investigation, you may or may not be included in any review of the findings. What we share is limited and may vary based on your involvement. Individuals who reported concerns or were the subject of the reported concerns will receive a follow-up notification and will be informed once the issue has been resolved. Any disciplinary actions taken will be based upon, and limited to, the findings of the investigation. Please note that we will not be able to give you full details of the outcome of a case (or related actions taken) for reasons of confidentiality, privacy, and the legal rights of all parties involved.

For certain types of concerns that are raised, including retaliation, discrimination, harassment, and hostile workplace, we may reach out after the closure of an investigation to learn if any additional support is needed, unless you opt out. Often, we cannot provide details about the specific actions taken for privacy and legal reasons. Decisions related to disciplinary actions take all relevant factors into account (for example, the severity of the incident and whether it was a first offense). We perform regular reviews to ensure the consistency and fairness of disciplinary actions. Everyone will be held to the same standard of accountability regardless of their position or level at the company.



What happens if this policy is misused?

It is a violation of our Code of Business Conduct & Ethics to knowingly make a false accusation, lie to or mislead investigators, interfere with or unduly influence an investigation, or refuse to cooperate in an investigation. Doing so may lead to disciplinary measures.

What if I have additional questions?

If you have any questions related to this Speak Up Policy or if you need help in reporting suspected misconduct, please contact any of the following:

- Your direct manager, leader, or People Operations
- Our Ethics Hotline at www.godaddy.com/ethicshelpline or 1-800-461-9330
- The Compliance team at compliance@godaddy.com

External Misconduct Reporting

GoDaddy endeavors to be transparent and wants to be made aware of suspected wrongdoings so it can address them as soon as possible. However, nothing in this policy (i) prohibits providing truthful testimony or accurate information in connection with any investigation being conducted into the business or operations of the Company or any of its affiliates by any government agency or regulatory or law enforcement authority, including but not limited to the Department of Justice, the Securities and Exchange Commission, the Equal Employment Opportunity Commission, any Inspector General, the New York Stock Exchange or the Financial Industry Regulatory Agency, that is responsible for enforcing a law on behalf of the government or otherwise providing information to the appropriate government regulatory agency or body regarding conduct or action undertaken or omitted to be taken by the Company or any of its affiliates that is reasonably believed to be illegal or in material non-compliance

with any financial disclosure or other regulatory requirement applicable to the Company or any of its affiliates; (ii) requires obtaining the approval of, or giving notice to, the Company or any of its employees or representatives to take any action permitted under preceding clause (i); or (iii) shall bar or impede in any way the ability to seek or receive any monetary award or bounty from any governmental agency or regulatory or law enforcement authority in connection with protected “whistleblower” activity. Additionally, nothing in this policy shall be interpreted or applied in a manner that would conflict with rights, if any, under the National Labor Relations Act.



