



# Code of Business Conduct & Ethics



# A word from our CEO on living our values

Dear team,

We designed our Code of Business Conduct and Ethics to promote a culture of honesty, integrity, and trust among ourselves, our customers, and our business partners.

Why do we do this? 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 GoDaddy to uphold it. So, I ask you to remember the following in everything you do:

Honest conduct is when we act with integrity and without fraud or deception.

Ethical conduct is when we embody our professional standards and our values.

Our Code of Conduct does not cover every issue we might encounter, but it does provide the guidelines we need to exercise good judgment. Not only do we comply with the letter of the law, we comply with the spirit of the law and the regulations applicable to our business.

If you hear or see something that conflicts with our policies or values, speak up. This is a safe place. We do not tolerate retaliation for reporting concerns made in good faith.

Together, we've built something special. Take pride in that. Do the right thing.

Best Regards,

*Aman Bhutani*

Aman Bhutani CEO,  
GoDaddy



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# Own Outcomes

Each of us must comply with all laws, rules and regulations applicable to our business. You are not expected to know all the laws and regulations applicable to our business, but you are expected to OWN OUTCOMES by learning the policies relevant to your job, asking for help if you have questions, and speaking up if you see or hear something you suspect violates our Code of Business Conduct and Ethics (“[Code](#)”).

If you know of a violation and don’t promptly report or correct it, or if you direct or approve violations or retaliate against anyone reporting a violation, you may be subject to disciplinary action up to and including termination.

While the Code applies to all GoDaddy employees, we place particularly high expectations on our managers given they are leaders and role models. This includes not only living the principles set forth in the Code every day, but also acting to create a positive work environment — leading by example and making sure all employees are comfortable raising concerns and asking questions. Our managers are expected to bring reports of any unethical or illegal conduct through appropriate channels, whether witnessing the misconduct themselves or receiving a report about it. We can’t address what we don’t know.

\*Our Code applies to GoDaddy Inc. and all subsidiaries (“GoDaddy”), and their employees worldwide. The GoDaddy Inc. Board of Directors (“Board of Directors”) and certain business partners serve as an extension of GoDaddy, and they are expected to follow our Code as well. We expect our contractors and their employees to act in a way consistent with our Code.

Our Code does not alter the terms and conditions of employment or create a contract of employment.

# Seeking Guidance & Reporting Concerns

There are multiple resources in place to help you respond to questions about the law, the Code, and our policies, as well as to report suspected violations. If you're unsure about a particular situation, use this guidance:

- Ask your immediate supervisor, local management, or local People Operations representative
- Check in with the Chief People Officer
- Connect with the Legal Department at [legal@godaddy.com](mailto:legal@godaddy.com)
- Reach out to [compliance@godaddy.com](mailto:compliance@godaddy.com)
- The Chief Legal Officer, who

reports directly to the CEO, is responsible for overseeing and monitoring compliance with the Code.

If you suspect a violation of law, the Code, or our policies, report it through one of the following channels:

- **Your immediate local supervisor, or any member of local management (including local People Operations)**
- **The Ethics Helpline.** Reports may be made through GoDaddy's third-party helpline provider online at [www.godaddy.com/ethicshelpline](http://www.godaddy.com/ethicshelpline) or by phone at **1-800-461-9330** in the U.S. or the applicable country telephone number provided on the helpline's

website. 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.

**Good faith reports relating to accounting, finance, internal accounting controls, bribery or anti-corruption, or antitrust/competition violations, may also be made directly, to the following:**

- Chief Executive Officer
- Chief Financial Officer
- Legal Department

- Audit Committee Chair of the Board of Directors

Because the manner in which reports of Code or legal violations may be made **varies from country to country\***, [compliance@godaddy.com](mailto:compliance@godaddy.com) is always available if you are uncertain which channel to use.

\*In Brazil and France, local laws do not require, but do encourage, employees to report a suspected violation of the Code.

# Confidentiality & Self-Identification

Information reported will be treated as confidentially as possible. You're encouraged to share your identity so GoDaddy can conduct the most thorough investigation possible. However, if you're uncomfortable identifying yourself, you may report anonymously unless prohibited under local law.



# After You Make A Report

Regardless of how you choose to report, we take all reports of actual or suspected misconduct seriously. All reports will be carefully investigated, and appropriate and necessary action will be taken. This includes disciplinary action up to and including termination, or possible civil or criminal penalties.

You may be asked by GoDaddy, an auditor, or a government official to take part in the investigation. If you receive a request to take part in a

government investigation or a request for information or documentation from a government official, immediately contact [legal@godaddy.com](mailto:legal@godaddy.com). You're expected to fully and honestly cooperate with these requests. Do not attempt to improperly or unduly influence any investigation or make untrue or misleading statements during an investigation. Similarly, to ensure the concern is properly investigated, do not conduct an investigation on your own.

# No Retaliation

Retaliating against anyone for reporting a possible violation in good faith is strictly prohibited.

“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. No one who reports or participates in an investigation will be retaliated against for participating in good faith. If you believe you have been subject to retaliation, reach out to a contact from the reporting channels above.



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# Respect Each Other, What We Do, & How We Do It

# Anti-Discrimination & Harassment

Our diversity is one of our greatest strengths. We are committed to providing equal opportunity in all aspects of employment and will not tolerate any discrimination, harassment or retaliation. Contact your local People Operations member or the Legal Department if you have any questions about applicable discrimination, harassment, or retaliation laws\*.

You should also review local policies, which include the US Anti-Discrimination, Harassment & Retaliation Policy.

\*Embrace our diversity to create an environment where colleagues can contribute, develop and fully utilize their talents.

Offensive messages, derogatory remarks and inappropriate jokes are inconsistent with our culture and beliefs, and are never acceptable.

Sexual harassment in any form, including, but not limited to, unwanted advances, inappropriate touching, requests for sexual favors, and inappropriate comments about another's appearance, is strictly prohibited.



# Health & Safety

We strive to provide a safe and healthy environment\*. Practice our safety and health rules, and report accidents, injuries and unsafe equipment, practices or conditions. Please review local safety and health rules. Violence and threatening behavior are never permitted.

\*We must perform our duties free from the influence of illegal drugs or alcohol. The use or possession of illegal drugs in the workplace is not tolerated.

# Protection & Proper Use of GoDaddy Assets

Take care of our GoDaddy equipment. Use it responsibly for legitimate business purposes, and immediately return all equipment when your relationship ends with GoDaddy. All GoDaddy computers and electronic devices will remain GoDaddy property, whether used entirely or partially on GoDaddy's premises or with the aid of GoDaddy's equipment or resources.

All software used for business must be appropriately licensed. Illegal or unauthorized copies of any software may constitute copyright infringement and may expose you and GoDaddy to potential civil and criminal liability. We may, consistent with applicable data privacy laws and policies, inspect GoDaddy computers periodically and will remove any non-licensed/supported software. This may include other necessary actions to ensure compliance with applicable policies or laws.





# Use of Information Technologies

You must, at all times, use GoDaddy-issued electronic communications devices (computers and voicemail) in a legal, ethical, policy-compliant, and appropriate manner, including after hours and during travel. You may not use our devices to engage in prohibited conduct. This includes viewing unauthorized, discriminatory, harassing, sexually explicit, or otherwise offensive or inappropriate material\*.

Use the same care when writing emails, instant messages, and text messages that you would take with any other GoDaddy document. When using emails, instant messages or text messages:

- consider when a meeting or call may be better
- limit recipients
- keep the communication brief and tone flat
- make sure your behavior is ethical and proper.

Remember, emails may be copied and forwarded worldwide without your knowledge or consent and electronic communications may become discoverable in investigations, audits and litigation.

## **\*Potentially Offensive Web Content**

Because GoDaddy hosts many different types of web content, sexually explicit or otherwise potentially offensive web images and content may arise in the work you perform. No one is required to view such images or content.

You should let your supervisor or [compliance@godaddy.com](mailto:compliance@godaddy.com) know if you are confronted with such images or content in the course of your work and are not comfortable.

# Privacy & Personal Information

Our data privacy policies ensure we comply with all applicable data privacy laws. These requirements can be complex and change often.

Contact [dl-privacyreview@godaddy.com](mailto:dl-privacyreview@godaddy.com) if you have any questions on our privacy policies or your obligations regarding personal information.

# Social Media

When you speak about GoDaddy in personal or unofficial online activities, remember the following:

- **Be transparent**

Disclose your affiliation with GoDaddy when promoting GoDaddy or its products and culture. Failure to be transparent could result in liability for false advertising or misrepresentation, among other things.

- **Be responsible**

GoDaddy respects your rights to use social media as a form of self-expression. We expect you to also respect our reputation and legal standing. Do not discuss confidential or proprietary GoDaddy information or provide false information. Participate in online discussions in a responsible manner, exercising sound judgment and common sense.



Patti Curtis  
Fogues Studios & Gallery  
FOGUESTUDIOS.COM

# Confidentiality & Security

As a trusted partner to our customers, we are vigilant about protecting their data and keeping it confidential. We also maintain the confidentiality of all other information entrusted to us, except when disclosure is made pursuant to an approved and executed non-disclosure agreement or required by law. Confidential information entrusted to us by our employees, suppliers, customers, and other business partners must be protected as carefully as our own. Confidential information includes all non-public information that might be of use to competitors, or harmful to GoDaddy, its affiliates, customers, partners, distributors and suppliers if disclosed. We must follow all applicable policies, security measures, and internal

control procedures for computer systems, portable electronic devices, Wi-Fi hotspots, laptops, and other storage devices (flash drives and USB devices).

Be cautious when discussing confidential information, including trade secrets, on a mobile device or with a coworker, partner, customer, or supplier in public places or your workspace. Do not leave documents containing confidential information in a place where an unauthorized person might have an opportunity to read them. When communicating with coworkers, only include those who need to be involved. The obligation to preserve confidential information continues even after employment ends\*.

\*In the U.S., the Defend Trade Secrets Act of 2016 allows disclosure of trade secrets under the following limited circumstances:

When made in confidence to an attorney, or to a U.S. Federal, State or local government official for the purpose of reporting or investigating a suspected violation of the law.

When made in a U.S. complaint or other document filed in a U.S. lawsuit or other proceeding under seal.

When made in connection with a U.S. lawsuit for retaliation, based upon a suspected violation of the law, and the disclosure is made to an attorney who is engaged for representation in the lawsuit.

All documents containing trade secrets are filed under seal; and trade secrets are not disclosed except pursuant to court order.



# Insider Trading

Our insider trading policy establishes guidelines to ensure employees and GoDaddy contractors and consultants who buy or sell GoDaddy stock, comply with laws prohibiting insider trading. The following is a summary of those guidelines, but please review the Insider Trading Policy for additional information related to insider trading restrictions. No one in possession of material, non-public information (“MNPI”) may buy or sell GoDaddy stock (or advise others to trade) from the time they obtain MNPI until the MNPI (1) has been publicly disclosed or (2) is no longer considered material. Once MNPI has been disclosed or no longer considered material and it is no longer considered MNPI, GoDaddy stock can then be traded.

However, such information may still be confidential and should be treated as such. Information is considered “material” if a reasonable investor would consider the information important in deciding whether to buy, sell, or hold a stock or other security. “Non-public” information refers to that which has not yet been disclosed to the public\*. Trading GoDaddy stock while in possession of MNPI and tipping MNPI to others are prohibited. “Tipping” occurs when MNPI is provided to another person and that person trades on the basis of that information. Tipping can result in the same consequences as insider trading. Insider trading and tipping are crimes with severe penalties, including fines and potential imprisonment.

\*Examples of MNPI may include:

- Unannounced pending mergers or acquisitions
- Unannounced/unreleased earnings
- Unannounced adjustments to key personnel positions

# Fair Disclosure & Outside Communications

The U.S. Securities and Exchange Commission (“SEC”) rules and regulations require publicly traded companies to make public any MNPI (oral or written) a company discloses to the financial community and stockholders. As a result, we must comply with our External Communications Policy that clarifies who may communicate information to the public, the press and the financial analyst communities. Public disclosure must be made prior to or at the same time as the communication of the information. For example, GoDaddy could comply with this requirement by filing the information on a report with the

SEC, distributing a press release or having conference calls with advance notice and access for the public. Only our Chairman of the Board of Directors, Chief Executive Officer, Chief Financial Officer, Vice President of Investor Relations, Chief Communications Officer, and Chief Legal Officer may make disclosures of MNPI. If GoDaddy discovers that it has made an unintentional non-public disclosure of material information, public disclosure must be made promptly. If you have a concern about a disclosure, contact [compliance@godaddy.com](mailto:compliance@godaddy.com).

# Document Management & Litigation Holds

We comply with all laws and regulations regarding the preservation of our records. Records shall be retained or destroyed only in accordance with our Record Retention Policy. Legal holds\* suspend all document destruction procedures. Do not destroy, alter or modify records or supporting documents subject to a legal hold until it is officially released by the Legal Department.

\*A legal hold is an instruction from the Legal Department regarding the preservation of records for purposes of litigation, audit, government investigation, or other special circumstances.

The Legal Department will identify which records are required to be placed under a legal hold and will notify you if a legal hold is placed on records you're responsible for.



Gabrielle & Sebastian Jackson  
The Social Club  
ATTHESOCIALCLUB.COM

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# Demonstrate Integrity



# Anti-Corruption Compliance

The U.S. Foreign Corrupt Practices Act\* (“FCPA”), the UK Bribery Act and numerous other anti-corruption and anti-bribery laws prohibit giving or offering anything of value, directly or indirectly, to a foreign government official in order to obtain or retain business or gain an unfair advantage. “Foreign government officials” include:

- officers, employees or consultants of a government or governmental department or agency at all levels,
- an officer or employee of a state-owned enterprise or partially state-owned enterprise, political party or an official or candidate for political office,
- an officer or employee of a public international organization such as the World Bank,
- members of a royal family, or an immediate family member\*\* of any of the foregoing persons.

These laws apply to indirect payments made through agents and include the use of personal funds—we cannot do indirectly what we’re prohibited from doing directly. See our Anti-Corruption Policy and Guidelines for more info.

- \*Did you know that many businesses in China are partially or wholly state owned entities, which may mean gifts to an employee of such business may be subject to the FCPA?
- Did you know that gifts, travel and entertainment provided or offered to foreign government officials are the focus of many FCPA enforcement actions?
- Did you know that enforcement actions hold individual employees as or more responsible for FCPA violations than the employee’s company?

Contact [compliance@godaddy.com](mailto:compliance@godaddy.com) with any questions.

\*\*“Immediate family member” means:

- spouse or domestic partner
- parents, step-parents
- children, step-children
- siblings, aunts, uncles, nephews, nieces
- grandparents and grandchildren (whether related by blood, marriage, or adoption)

# Gifts & Entertainment

You may occasionally provide or accept business gifts and entertainment from customers or other parties who have or seek a business relationship with GoDaddy, but only if they are consistent with customary business practices and in accordance with anti-corruption and anti-bribery laws. Examples include reasonable business-related meals, logoed gifts, and small pre-approved prizes or awards given at GoDaddy-sponsored events — none of which is intended to induce or reward the obtaining or retaining of business or otherwise influence a business decision. Such gifts and entertainment must

not improperly influence any of your business decisions. In fact, no gift, thing of value or entertainment shall be offered, given or accepted by any of us or immediate family member unless it:

- is not a cash gift
- is consistent with customary business practices
- is not excessive in value
- cannot be construed as a bribe or payoff
- does not violate any laws or regulations
- is not one of a series of small gifts or entertainments that can add up to a larger, expensive gift\*

Additional information regarding gifts and business expenses can be found in our Anti-Corruption Policy and Guidelines or contact [compliance@godaddy.com](mailto:compliance@godaddy.com) with any questions.

- \*Receipt of a box of cookies from a supplier at the holidays is consistent with customary business practices, not excessive in value, and acceptable.
- An invitation to attend an all-expense paid weekend at a five star resort in Hawaii during final contract negotiations with a prospective supplier is not a customary business practice, it is excessive in value, and it could be construed to be a payoff, thus not acceptable.
- Offering to pay a supplier inflated sums of money for substandard or non-existent products or services is likely to be determined to be a kickback, which is a form of bribery.

# Conflicts of Interest

A conflict of interest is when private interests interfere in any way, or appear to interfere, with the interests of GoDaddy. A conflict of interest can arise if you take action or have interests that may make it difficult to perform your work objectively, effectively and without bias. For example, working for, serving on the board of directors, or receiving compensation from any person, organization, or business entity that does or seeks to do business with GoDaddy may be a conflict of interest. Employees are encouraged to participate in their communities, but they must obtain advance approval from the Chief Legal Officer before serving as a director, trustee or officer of any company or organization.

Although activities outside GoDaddy are not necessarily a conflict of interest, a conflict could arise depending upon your position with GoDaddy and GoDaddy's relationship with its suppliers, customers or competitors. You are required to disclose to [compliance@godaddy.com](mailto:compliance@godaddy.com) any financial interests that you or your immediate family members have with any GoDaddy competitor, supplier or any other entity that may affect objective decision-making. This disclosure requirement does not apply to investment in mutual funds or retirement accounts over which you or an immediate family member exercise no discretionary control\*.

\*Other examples of potential or actual Conflicts of Interest include:

- Working for a competitor in any capacity
- Using customer information for personal or immediate family interests.
- If you are unsure if a conflict of interest exists or have any questions, please contact [compliance@godaddy.com](mailto:compliance@godaddy.com).

# Workplace Relationships

Certain workplace relationships may be considered or perceived to be conflicts of interest. As a result, GoDaddy employees who have a romantic or close personal relationship, or become related, may not remain in a reporting relationship. This includes being in a position of influence on and control of the other's compensation or conditions of employment. Workplace relationships should be reported to People Operations. Where appropriate, we'll attempt to identify other opportunities such as job transfer or reassignment. If no alternate position is available or meets GoDaddy and the employee's expectations, GoDaddy reserves the right to take other appropriate action.



# Corporate Opportunities

Each GoDaddy employee has a duty to advance the company's interests when the opportunity arises. Failing to do so may create a conflict of interest. For example, GoDaddy employees who talk with customers during work are prohibited from soliciting business for their family member's business because doing so would put the employee's personal interests before GoDaddy's business interests. Contact [compliance@godaddy.com](mailto:compliance@godaddy.com) if you have any questions. Also, we may not seize a corporate opportunity by having an immediate family member or other do what we are prohibited from doing\*.

\*Prohibited conduct includes:

- Personally taking for yourself, or your family members, opportunities that are discovered through the use of GoDaddy property or information or your GoDaddy position;
- Using GoDaddy property or information, such as customer data, or your GoDaddy position for personal gain or for the gain of your family members.

# Competition & Antitrust Laws

As part of our commitment to developing long-term relationships with our customers and suppliers, we take pride in competing fairly and with integrity. We compete solely on the basis of our quality products and services, and never take advantage of anyone through unfair practices.

We are accurate and truthful in all of our business dealings and never making misleading statements about our competitors or their products or services.

To ensure markets operate fairly and efficiently, many countries have implemented laws to combat anti-competitive practices. These are designed to protect free

enterprise and/or consumer interests. Anti-competition and antitrust laws generally forbid discussing or entering into formal or informal agreements regarding activities that may restrain trade, such as bid rigging, price fixing and dividing or allocating specific market territories with **competitors\***.

Illegal agreements do not have to be signed contracts and may be as simple as informal understandings between two parties. If any of these topics of discussion arise when talking with a competitor, stop the conversation immediately and report it to **compliance@godaddy.com**.

Violations of anti-competition laws carry severe consequences. These laws are complex and every country maintains its own laws regulating competition. Contact **compliance@godaddy.com** with any questions. Exercise caution and avoid any interaction with competitors that may place you or GoDaddy at risk.

\*Examples of scenarios where competition/antitrust issues could arise include:

- Attending an industry tradeshow, such as ICANN or NamesCon, and participating in discussions with competitors about pricing, margins or other non-public information.
- Emailing a competitive registrar about not pursuing sales activities in a certain market.

If you have a question, contact **compliance@godaddy.com**.

# Financial & Accounting Integrity

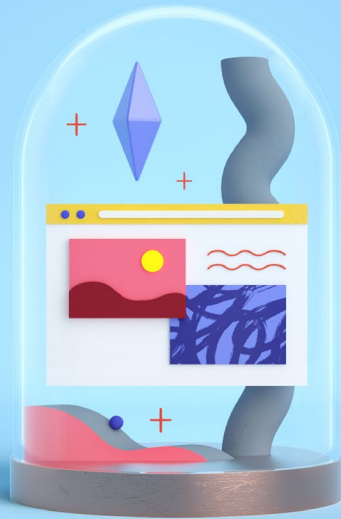
The information in our public communications, including filings with the SEC, must be full, fair, accurate, timely and understandable. We are all responsible for complying with GoDaddy's disclosure controls and procedures, and internal controls for financial reporting. We must maintain our books, records, accounts, and financial statements in reasonable detail. We must also ensure that these records reflect the related transactions and matters and conform both to applicable legal requirements and our system of internal controls.

Making false or misleading records or documentation is strictly prohibited. Honest and accurate recording and reporting of information is critical to making responsible business decisions. Never falsify or alter any GoDaddy records or reports. Unrecorded funds or assets shall not be maintained.

Even if you are not directly involved in financial reporting or accounting, you are likely involved with financial records or reports of some kind (e.g. an application for employment, voucher, time sheet, expense report, sales

report or invoice, purchase order or other record kept in the course of business). Regardless of whether you are otherwise required to be familiar with finance or accounting matters, we expect you to ensure that every financial record or report is full, fair, accurate, timely and understandable.

Anyone who believes that questionable accounting or auditing conduct has occurred or is occurring must comply with GoDaddy's Policy Regarding Reporting of Accounting and Auditing Matters.



# Money Laundering Prevention

Money laundering is the act of concealing the sources or use of money, or to avoid paying taxes or other legal monetary requirements. More than one hundred countries have laws against money laundering. These laws prohibit conducting transactions that involve proceeds from criminal activities. People involved in criminal activities (e.g. terrorism, narcotics, tax evasion and fraud) may try to “launder” the proceeds of their crimes to hide

them or make them appear legitimate. A related concern, sometimes called reverse money laundering, is the use of legitimate funds to finance terrorists or other improper activity. GoDaddy is committed to complying fully with all anti-money laundering and anti-terrorism laws.

Notify [compliance@godaddy.com](mailto:compliance@godaddy.com) if a transaction or wiring instructions appears suspicious.

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# Practice Ethical Conduct When Joining Forces With Partners





# Supplier Relationships

We purchase supplies and services based on need, quality, price, and terms and conditions. We select suppliers through a competitive bid process where possible. We don't discriminate on characteristics protected by applicable law. It is also important to our reputation, as a responsible partner, to engage only those suppliers that comply with all applicable laws, including laws regarding the eradication of human trafficking and slavery and compliance with other applicable employment, environmental, anti-corruption,

fair competition and intellectual property laws. No one should engage any supplier without first consulting with and following the protocols of the Procurement Department. A GoDaddy supplier is generally free to sell its products or services to any other party, including GoDaddy competitors, unless GoDaddy and the supplier have agreed to exclusivity based on the proprietary nature of the products or services. If you have questions, contact [purchasing@finance.godaddy.com](mailto:purchasing@finance.godaddy.com)

# Export Controls

The United States and other countries maintain economic and trade sanctions targeted at individuals, entities and jurisdictions engaging in activities believed to pose a threat to foreign policy or national security objectives. Sanctions may be aimed at certain countries (e.g., Iran, Cuba, North Korea, Syria) or persons and entities (e.g., terrorist organizations and drug traffickers). Sanctions can take various forms and may require companies to refrain from doing business with certain entities and persons, to refrain from exporting or importing certain goods or services, and to comply with travel bans or other restrictions. The regulations

are complex and apply both to exports from the United States and to exports of products from other countries, when those products contain U.S.-origin components or **technology**\*.

In some circumstances, an oral presentation containing technical data made to foreign nationals in the United States may constitute an export subject to control. You may not authorize, approve, or knowingly enter into any transaction to provide products, services or technology to any individual, company or country subject to national or international sanctions. If you have any questions, contact [\*\*compliance@godaddy.com\*\*](mailto:compliance@godaddy.com).

\*The US Treasury Department's Office of Foreign Assets Control ("OFAC") and other countries' agencies administer and enforce economic and trade sanctions imposed against certain countries, individuals and companies.

GoDaddy has a Sanctions Compliance Program that screens customers to ensure we do not do business with someone subject to OFAC and other applicable sanctions.



Max Henriquez  
Phat Birds  
PHATBIRDS.COM

# Anti-Boycott Laws

A boycott occurs when one group, business or country refuses to do business with a particular person or country. U.S. anti-boycott laws prohibits us from cooperating with boycotts not sanctioned by the United States. Even when we are conducting business outside of the United States, we must comply with U.S. anti-boycott laws. The law requires us to report all requests to participate in an unsanctioned boycott. Requests may be hidden in seemingly harmless documents, like letters of credit or bills of lading. If you have a question regarding anti-boycott laws or receive such a request, contact [compliance@godaddy.com](mailto:compliance@godaddy.com).



# U.S. Government Business

When dealing with U.S. federal, state, municipal or any other U.S. government officials, you must avoid any activity that either is or appears to be, illegal or unethical. U.S. Government officials at all levels are obligated to follow specific codes of conduct and laws. Promising, offering or giving favors, gratuities or gifts (including meals, entertainment, transportation, and lodging) to officials in the various branches of U.S. government, as well as state and local governments, is restricted by law. You must obtain pre-approval from our Chief Legal Officer before providing anything of value to a government official (except in the case of lawful personal political contributions).

# Political Contributions

We encourage our employees to actively participate in the political process on a voluntary basis and during personal time, unless applicable law requires otherwise. GoDaddy funds or assets must not be used for, or be contributed to, political campaigns or political practices without the prior written approval of GoDaddy's Chief Legal Officer.



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# Amendments & Waivers

If you'd like to apply for a waiver of any of the provisions of this Code, fully disclose your particular circumstances in writing to [compliance@godaddy.com](mailto:compliance@godaddy.com) and wait for approval before engaging in any activity that would violate this Code. The Board of Directors will approve waivers for any its members, executive officers or senior financial or accounting officers. The Board of Directors will also review and approve any material amendments to this Code. The Chief Legal Officer will approve waivers of or amendments to the Code that are not required to be approved by the Board of Directors.

Have a Question?

# We're here to help

For all questions on this document please  
write us at [compliance@godaddy.com](mailto:compliance@godaddy.com)

