

## **GODADDY INC.**

### **POLICY REGARDING REPORTING OF ACCOUNTING AND AUDITING MATTERS**

**Adopted December 10, 2014**

GoDaddy Inc. (the “Company”) is committed to maintaining high standards of financial integrity, and the audit committee (the “Audit Committee”) of the Company’s board of directors takes very seriously all complaints and concerns regarding accounting, internal accounting controls, auditing and other legal matters. The Company relies upon its officers, directors, employees, independent contractors and others who do business with it to bring to light good faith concerns regarding its business practices as set forth below.

The Company strongly encourages its officers, directors, employees, independent contractors and others who reasonably believe that they are aware of questionable accounting, internal accounting controls or auditing matters, or of the reporting of fraudulent financial information, or of certain violations of securities laws or other laws, to raise these concerns as soon as possible after discovery. Individuals who raise such concerns should know that in doing so they will not be subject to any harassment, discrimination or retaliation of any kind.

Accordingly, the Audit Committee has established the following procedures for:

- The receipt, retention and treatment of complaints regarding accounting, internal accounting controls or auditing matters; and
- The confidential, anonymous submission by employees of the Company (and its subsidiaries) (collectively, “employees”) of concerns regarding accounting or auditing matters they believe to be questionable or violations of the Company’s Code of Business Conduct and Ethics, the U.S. federal securities laws or Foreign Corrupt Practices Act (the “FCPA”) (or similar laws).

The Audit Committee is committed to continuously reviewing and updating Company policies and procedures. The Company may modify this policy at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with state or federal regulations and/or to accommodate organizational changes.

#### **A. Matters that Should be Reported**

Employees are strongly encouraged to immediately report and submit complaints of accounting and auditing and other legal matters for which there is actual or suspected:

- Intentional error or fraud in the preparation, review or audit of any of the Company’s financial statements;
- Significant deficiencies in internal and reporting controls or intentional noncompliance with those controls;
- Violations of U.S. Securities and Exchange Commission (“SEC”) rules and regulations that are related to accounting, internal accounting controls and auditing matters;
- Fraud against investors, securities fraud, mail or wire fraud, bank fraud or fraudulent statements to management, the SEC or members of the investing public; or
- Violations of the Company’s Insider Trading Policy, the U.S. federal securities laws or the FCPA (or similar laws including, but not limited to, the United Kingdom Bribery Act and the European Union’s Data Protection Directive).

## **B. Receipt of Complaints**

1. Non-employees are strongly encouraged to submit complaints regarding accounting, internal accounting controls or auditing matters by mail to:

GoDaddy Inc.  
14455 N. Hayden Road  
Scottsdale, Arizona 85260  
Attn: General Counsel

2. Employees are strongly encouraged to submit concerns regarding the information set forth in Section A that they believe to be questionable (confidentially and anonymously, if they wish) in one of the following ways:

- Via electronic mail directly to the Audit Committee at [auditcommittee@godaddy.com](mailto:auditcommittee@godaddy.com);
- Via electronic mail to the Company's General Counsel at [nkelly@godaddy.com](mailto:nkelly@godaddy.com);
- Via Internet to the Company's third party service provider at [www.godaddy.com/ethicshelpline](http://www.godaddy.com/ethicshelpline)
- Via the Company's telephone hotline at 1.800.461.9330 or
- Via regular mail as set forth above.

3. The methods of submitting complaints shall be published on the Company's external and internal websites in such manner as the General Counsel, in consultation with the Audit Committee, deems appropriate. It shall be emphasized to employees that the methods of submitting complaints listed above may be used anonymously and that such complaints shall be treated confidentially.

4. Except for complaints sent directly to the Audit Committee or complaints concerning the General Counsel's office, which should be conveyed directly to the Audit Committee, all complaints will be forwarded to the General Counsel's office, as appropriate, for coordination of their treatment as set forth below.

## **C. Treatment of Complaints**

1. Accounting and Auditing Complaints:

A. All accounting and auditing complaints received shall be entered on an accounting and auditing matters log, which shall include, among other things, information regarding the date the complaint was received, a description of the complaint, the submitter (if provided), and the status and disposition of an investigation of the complaint. Receipt of the complaint will be acknowledged to the sender, within a reasonable period following receipt, if appropriate information for response is supplied.

B. With respect to complaints not initially directed to the Audit Committee regarding accounting or auditing matters, the General Counsel will report immediately to the Audit Committee matters she deems significant (*e.g.*, allegations of fraud or allegations of accounting or auditing matters she believes to be questionable involving executive officers). The Audit Committee shall direct and oversee an investigation of such complaints, as well as any complaints initially directed to the Audit Committee, as it determines to be appropriate.

C. All other complaints regarding accounting or auditing matters that the General Counsel deems not to be significant shall be reviewed under the direction and oversight of the General Counsel, who will involve such other parties (*e.g.*, members of the internal audit team or outside advisors) as deemed appropriate. The General Counsel shall provide the Audit Committee with a quarterly report of all accounting or auditing

complaints received and an update of pending investigations. The Audit Committee may request special treatment for any complaint and may assume the direction and oversight of an investigation of any such complaint.

2. Non-Accounting and Auditing Complaints: Non-accounting or non-auditing complaints shall be logged separately and will be forwarded to the appropriate person or department for investigation (*e.g.*, the General Counsel, Human Resources or Security), unless the Audit Committee or General Counsel, as appropriate, deems other treatment is necessary (*e.g.*, such complaint involves a finance employee or an executive officer). Complaints regarding security matters shall also be forwarded to the [Security Committee] which shall inform the Audit Committee and/or the Company's board of directors as it deems appropriate.

3. Confidentiality will be maintained to the fullest extent possible, consistent with the need to conduct an adequate review. Access to reports and records of complaints may be granted to regulatory agencies and other parties at the discretion of the Audit Committee. Documents that are covered by the attorney-client communication and/or work-product privileges should not be disclosed unless the General Counsel's office has consented in writing to a waiver of privilege.

4. In all cases, prompt and appropriate corrective action shall be taken as determined by the General Counsel or Audit Committee. Where questionable accounting, internal accounting controls or auditing matters or the reporting of fraudulent financial information is verified, corrective action will be taken and, if appropriate, the persons responsible will be disciplined.

5. Reprisal, threats, retribution or retaliation in any way against any person who has in good faith made a complaint or reported a concern, or against any person who assists in any investigation or process with respect to such a complaint or concern, is strictly prohibited. Employees who believe that they have been subjected to any discrimination, retaliation or harassment for having submitted a complaint regarding questionable accounting, internal accounting controls or auditing matters, or the reporting of fraudulent financial information under this policy, or participating in an investigation relating to such a complaint, should immediately report the concern to the General Counsel or to any of their supervisors. Any complaint that such discrimination, retaliation or harassment has occurred will be promptly and thoroughly investigated by the General Counsel or the Audit Committee. If such a complaint is substantiated, appropriate disciplinary action will be taken, up to and including termination.

6. The General Counsel or Audit Committee will report the results of any investigation regarding a complaint, including any corrective actions taken, to the person making the complaint, if appropriate information for response was supplied, maintaining the anonymity of the person making the complaint to the fullest extent possible.

7. The Audit Committee shall provide reports to the Company's board of directors periodically, and at least annually, regarding all significant complaints and the results of any investigation regarding a complaint, including any corrective actions taken.

#### **D. Retention of Complaints**

The General Counsel shall retain written complaints, the accounting and auditing matters log and all related documentation as required under applicable law.

#### **E. Additional Enforcement Information**

Our Company endeavors to operate on a highly transparent basis, and we want to be made aware of alleged wrongdoings and to address them as soon as possible. However, nothing in this policy is intended to prevent any employee from reporting information to federal or state law enforcement agencies when an employee has reasonable cause to believe that the violation of a federal or state statute has occurred. A report to law enforcement agencies may be made instead of, or in addition to, a report directly to the Company through its management or the Company's reporting hotline.