

GoDaddy EMEA Modern Slavery Act Statement

1. Introduction

Slavery and human trafficking remain an affliction on global society. GoDaddy EMEA is committed to preventing acts of modern slavery and human trafficking from occurring, within both our business and supply chains.

GoDaddy EMEA takes seriously its responsibility to be alert and vigilant to the risk of modern slavery within its supply chain. We are committed to ensuring that our employees and our wider supply chain are aware of these risks and understand how to report them.

A key value of our business is an open culture where staff should feel comfortable to report any concerns that they may have regarding slavery and human trafficking. To ensure all directors, managers, and staff feel at ease when dealing with issues that may arise, we have begun to develop a modern slavery and human trafficking training in order to educate our employees.

2. Structure and business

GoDaddy Inc. is a leading technology provider to small businesses, web design professionals and individuals, delivering simple, easy to use cloud-based products and outcome-driven, personalized Customer Care. We operate the world's largest domain marketplace, where our customers can find that unique piece of digital real estate perfectly matching their idea. We provide website building, hosting and security tools to help customers easily construct and protect their online presence. As our customers grow, we provide applications and access to relevant third-party products helping them connect to their customers, manage and grow their businesses and get found online. As of December 31, 2017, we had more than 17 million customers globally and provided localized solutions in over 50 markets. Approximately 33% of our total bookings were attributable to customers outside of the U.S.

As of December 31, 2017, we had 5,990 employees worldwide, including 3,588 in our Customer Care team, 1,360 in technology and development, 268 in marketing and advertising and 774 in general and administrative. Excluded from our employee figures are nearly 1,900 Customer Care specialists located in Bulgaria, China, Colombia, India, Mexico, the Philippines and the United Kingdom who are directly employed by third-party partners, but who are dedicated to GoDaddy on a full-time basis. Substantially all of our employees are based in the U.S. and Europe.

Our people and unique culture have been integral to our success. We live by the same principles that enable new ventures to survive and thrive: hard work, perseverance, conviction, an obsession with customer satisfaction and a belief that no one can do it better. We take responsibility for driving successful outcomes and are accountable to our customers, which we believe has been a key factor in enabling our rapid customer and revenue growth. We believe we have one of the most recognized technology brands in the U.S.

To find out more about the nature of our business, please visit our website:

<https://uk.godaddy.com/>

GoDaddy Inc. is headquartered in Scottsdale, Arizona and sells its products and services throughout Europe, including the United Kingdom, through its GoDaddy EMEA subsidiaries, including GoDaddy.com LLC, Europe Domains/Hosting Services, Ltd., and 123-Reg Limited, all of which are covered by this Group Statement.

3. Update to relevant policies

We do not consider that we work in high-risk sectors or locations because the majority of our products and services are online and our offices and support services are not located in high-risk locations. The substantial majority of our suppliers are IT, software, financial and professional services organizations, including banks, lawyers, accountants, consultants, insurers and recruitment

agencies. Other suppliers include providers of office supplies, catering, office cleaning, and other facilities management providers. Notwithstanding the relatively low risk, we understand the importance of combatting slavery and human trafficking and are committed to ensuring that modern slavery is not taking place in our business or our supply chains.

As such, we recently updated our Global Master Services Agreement - Supplier Code of Conduct ("Supplier Code") with the following language:

Labor: GoDaddy will not tolerate Service Providers that use child labor or forced labor such as slave, prison, indentured, bonded, or otherwise. GoDaddy will not tolerate any Service Providers that engage in the trafficking or exploitation of workers in any manner. GoDaddy Service Providers must at a minimum comply with all applicable laws for the issues identified below:

- Freely Chosen Employment; Anti-Human Trafficking
- Humane Treatment
- Child Labor Avoidance; Student Interns
- Non-Discrimination
- Working Hours
- Freedom of Association and Collective Bargaining
- Wages and Benefits
- Immigration Law and Compliance

In addition, the Supplier Code gives us the right to audit and/or inspect service providers to ensure compliance. The Supplier Code also gives us the right to terminate contractual relationships with suppliers if the audits demonstrate that the supplier has failed to follow the Code.

In addition to the Supplier Code, GoDaddy has its own Code of Conduct, which includes policies and procedures to combat discrimination, harassment and sets forth workplace expectations for employee behavior and conduct. Lastly, GoDaddy has a dedicated and confidential Ethics Helpline where an employee may ask a question or report a potential violation regarding an ethics or compliance issue. The Ethics Helpline is administered by a third party to maintain confidentiality and when requested and permitted by local law, anonymity.

4. Identifying and assessing risk

During the 2018 financial year, we identified 10 of our top UK suppliers and sent them a questionnaire with the aim of better understanding our suppliers' self-assessment of slavery and human trafficking issues within their organizations. We are analyzing the results of the questionnaire and will use the information we have gained to improve standards and identify areas of core risk if any. We plan to expand this questionnaire program to most of our UK suppliers as well as instituting it as an automated supplier onboarding process for new suppliers in 2019. We feel that this will allow us to better identify and track slavery and human trafficking issues as they develop over time.

5. Key performance indicators

To assess the effectiveness of our anti-slavery and human trafficking measures we will be reviewing the following key performance indicators:

- Number of slavery and human trafficking issues reported in violation of the Supplier Code
- Staff training levels

6. Training

A key part of our anti-slavery and human trafficking strategy is to promote cultural change through training. This last financial year we commenced development of training materials, which staff will be able to access to: (i) learn about modern slavery and human trafficking; and (ii) understand how to report any issues in the workplace. We will start delivering such training to key operational areas where the potential risks are the highest (e.g. procurement) by the end of the 2019 financial year. Over the course of the next financial year, we will continue to enhance our procedures to help us identify, prevent and mitigate any risks of modern slavery or human trafficking in relation to new and existing suppliers.

7. Our statement

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 (the “Act”) and constitutes GoDaddy EMEA’s (inclusive of the relevant subsidiaries to which the Act applies) slavery and human trafficking statement for the financial year commencing January 2018 and ending December 2018.

Signature:
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