STARFIELD TECHNOLOGIES, LLC, A SUBSIDIARY OF GODADDY, INC.

WEBTRUST FOR CERTIFICATION AUTHORITIES REPORT

JANUARY 1, 2025 TO DECEMBER 31, 2025

Attestation and Compliance Services

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Section I

Independent Accountant's Report

REPORT OF THE INDEPENDENT ACCOUNTANT

To the Management of Starfield Technologies, LLC ("Starfield"), a subsidiary of GoDaddy, Inc. ("GoDaddy"):

Scope

We have examined Starfield's management assertion that for its Certification Authority ("CA") operations at its Phoenix, Arizona, USA, and Ashburn, Virginia, USA, locations, for its Starfield and GoDaddy CA certificates as enumerated in Appendix A, Starfield has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices within its
    - Starfield CA Certificate Policy (CP) and Certification Practice Statement (CPS) v5.01, dated April 1, 2024; and
    - Starfield CA Certificate Policy (CP) and Certification Practice Statement (CPS) v5.02, dated February 28, 2025
    - Starfield CA Certificate Policy (CP) and Certification Practice Statement (CPS) v5.03, dated August 28, 2025
    - Starfield CA Certificate Policy (CP) and Certificate Practice Statement (CPS) v5.04, dated September 26, 2025
    - Starfield CA Certificate Policy (CP) and Certificate Practice Statement (CPS) v5.05, dated November 28, 2025
- maintained effective controls to provide reasonable assurance that:
    - Starfield provides its services in accordance with its Certificate Policies and Certificate Practice Statements;
- maintained effective controls to provide reasonable assurance that:
    - the integrity of keys and certificates it manages is established and protected throughout their lifecycles;
    - the integrity of subscriber keys and certificates it manages is established and protected throughout their lifecycles;
    - subscriber information is properly authenticated (for the registration activities performed by Starfield); and
    - subordinate CA certificate requests are accurate, authenticated, and approved
- maintained effective controls to provide reasonable assurance that:
    - logical and physical access to CA systems and data is restricted to authorized individuals;
    - the continuity of key and certificate management operations is maintained; and
    - CA systems development, maintenance, and operations are properly authorized and performed to maintain CA systems integrity

throughout the period January 1, 2025 to December 31, 2025, based on the WebTrust Principles and Criteria for Certification Authorities v2.2.2.

Starfield does not escrow its CA keys, does not provide subscriber key generation services, subscriber key storage and recovery services, integrated circuit card lifecycle management, and does not provide certificate suspension services. Accordingly, our examination did not extend to controls that would address those criteria.

Certification Authority's Responsibilities

Starfield's management is responsible for its assertion, including the fairness of its presentation, and the provision of its described services in accordance with the WebTrust Principles and Criteria for Certification Authorities v2.2.2.

Practitioner's Responsibilities

Our responsibility is to express an opinion on Starfield management's assertion based on our examination. Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants and in accordance with International Standard on Assurance Engagements 3000, Assurance Engagements Other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects. An examination involves performing procedures to obtain evidence about management's assertion. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of management's assertion, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with the Code of Professional Conduct established by the AICPA and the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants.

We applied the Statements on Quality Control Standards established by the AICPA and, accordingly, maintain a comprehensive system of quality control.

The relative effectiveness and significance of specific controls at Starfield and their effect on assessments of control risk for subscribers and relying parties are dependent on their interaction with the controls and other factors present at individual subscriber and relying party locations. Our examination did not extend to controls at individual subscriber and relying party locations and we have not evaluated the effectiveness of such controls.

Inherent Limitations

There are inherent limitations in the effectiveness of any system of internal control, including the possibility of human error and the circumvention of controls. For example, because of their nature, controls may not prevent, or detect unauthorised access to systems and information, or failure to comply with internal and external policies or requirements. Also, the projection to the future of any conclusions based on our findings is subject to the risk that controls may become ineffective.

Opinion

In our opinion management's assertion, as referred to above, is fairly stated, in all material respects.

This report does not include any representation as to the quality of Starfield's services other than its CA operations at its Phoenix, Arizona, USA, and Ashburn, Virginia, USA, locations, nor the suitability of any of Starfield's services for any customer's intended purpose.

Other Matters

Without modifying our opinion, we noted the following other matters during our examination:

Matter Topic		Matter Description
1	Does Not Provide a Method for Domain Owners to Revoke Their Certificates	Bugzilla #1924992: On October 16, 2024, GoDaddy was notified that GoDaddy CA (formerly Starfield) did not provide a method for domain owners to revoke their certificates.
2	Delayed CRL File Updates	GoDaddy disclosed in Bugzilla #1949895 that on February 19, 2025, GoDaddy identified an issue which prevented CRL updates from happening as expected. This bug started on February 17, 2025 04:00 UTC and was the result of a server level configuration change. The impact was 7,899 certificate revocations that were not updated on CRL files within 24 hours of their revocation which is a violation of Section 4.9.7 of the Baseline Requirements for the Issuance and Management of Publicly-Trusted TLS Server Certificates which states that "CAs issuing Subscriber Certificates MUST update and publish a new CRL within twenty-four (24) hours after recording a Certificate as revoked." The issue was limited to CRL updates and was corrected on February 19, 2025 19:01 UTC. Certificate issuance was not impacted. A full incident report was made available on February 28, 2025.
3	Delayed Revocation	Bugzilla #1942877: On January 21, 2025, GoDaddy received a problem report alerting them to a delayed revocation of 31 certificates reported to have compromised keys due to the Fortinet leak. The compromised certificates were first reported on January 17, 2025, however, the mail address did not accept e-mails with attachments. The user was then contacted by GoDaddy that afternoon requesting the affected keys to be sent to GoDaddy. The certificates and keys were immediately sent to GoDaddy. The following day, three additional certificates and keys were identified and sent to GoDaddy. The certificates were still not revoked as of January 21, 2025, the day the report was submitted.
4	Revocation Process is Unusable Due to Contact Address Not Accepting Attachments	Bugzilla #1942241: On January 16, 2025, GoDaddy received a problem report alerting them unusable revocation process for reporting a large number of certificates with compromised keys. The compromised keys were first reported in an e-mail with an attachment to 'practices@starfieldtech.com.' However, the mail address did not accept mail attachments. Alternate methods for submitting the compromised keys were attempted, including a tarball and a .zip file, however, the same response was received each time indicating that the mail address could not accept the attachment type.
5	Missing R1 Intermediate Full CRL URLs in CCADB	Bugzilla #2002402: On November 25, 2025, GoDaddy reported that full CRL URLs were missing on the GoDaddy and Starfield R1 intermediate certificate CCADB entries.
6	CA Certificates Published in PEM Format	Bugzilla #2004845: On December 8, 2025, GoDaddy reported that two CA certificate files referenced in the CA Issuers URI (AIA) of issued certificates were being served in PEM format.
7	CRL Disclosure in CCADB Mismatch with Issued Certificates	Bugzilla #2007216: On December 19, 2025, GoDaddy reported a mismatch of their CRL files for issuing intermediate certificates on the CCADB and what was listed on the leaf certificates.

Matter Topic		Matter Description
8	Partitioned CRL Files Missing Issuing Distribution Point	Bugzilla #2007217: On December 19, 2025, GoDaddy reported that partitioned CRL files were missing an issuing distribution point.

In addition, our examination identified certain CAs disclosed in the Starfield CP/CPS that were not included in the publicly available repository as required under Control 6.5 of the WebTrust Principles and Criteria for Certification Authorities v2.2.2. Starfield added the certificates to the publicly available repository in August 2025. Additionally, It was determined that the certificates were constrained and Starfield management represented that these roots were never operationalized, did not issue certificates, and had no impact on relying parties or certificate subscribers. During our assessment, Schellman performed testing of certificate issuance, on a sample basis, and noted that there were no certificate issuance deficiencies identified in the samples tested. As a result, our opinion is not modified with respect to these matters.

Use of the WebTrust seal

Starfield's use of the WebTrust for Certification Authorities Seal constitutes a symbolic representation of the contents of this report and it is not intended, nor should it be construed, to update this report or provide any additional assurance.

Schellman & Company, LLC

Schellman & Company, LLC
Tampa, Florida
February 24, 2026

SECTION 2

MANAGEMENT'S ASSERTION

MANAGEMENT'S ASSERTION

Starfield Technologies, LLC ("Starfield") operates the Certification Authority ("CA") services for its Starfield and GoDaddy CA certificates as enumerated in Appendix A, and provides the following CA services

- Subscriber registration
- Certificate renewal
- Certificate rekey
- Certificate issuance
- Certificate distribution
- Certificate revocation
- Certificate validation
- Subordinate CA and cross-certification

The management of Starfield is responsible for establishing and maintaining effective controls over its CA operations, including its CA business practices disclosures on its website, CA business practices management, CA environmental controls, CA key lifecycle management controls, certificate lifecycle management controls, and subordinate CA certificate lifecycle management controls. These controls contain monitoring mechanisms, and actions are taken to correct deficiencies identified.

There are inherent limitations in any controls, including the possibility of human error, and the circumvention or overriding of controls. Accordingly, even effective controls can only provide reasonable assurance with respect to Starfield's Certification Authority operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

Starfield management has assessed its disclosures of its certificate practices and controls over its CA services. Based on that assessment, in Starfield management's opinion, in providing its CA services at its Phoenix, Arizona, USA, and Ashburn, Virginia, USA, locations, Starfield has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in its:
    - Starfield CA Certificate Policy (CP) and Certification Practice Statement (CPS) v5.01, dated April 1, 2024; and
    - Starfield CA Certificate Policy (CP) and Certification Practice Statement (CPS) v5.02, dated February 28, 2025
    - Starfield CA Certificate Policy (CP) and Certification Practice Statement (CPS) v5.03, dated August 28, 2025
    - Starfield CA Certificate Policy (CP) and Certificate Practice Statement (CPS) v5.04, dated September 26, 2025
    - Starfield CA Certificate Policy (CP) and Certificate Practice Statement (CPS) v5.05, dated November 28, 2025
- maintained effective controls to provide reasonable assurance that:
    - Starfield provides its services in accordance with its Certificate Policies and Certificate Practice Statements;
- maintained effective controls to provide reasonable assurance that:
    - the integrity of keys and certificates it manages is established and protected throughout their lifecycles;
    - the integrity of subscriber keys and certificates it manages is established and protected throughout their lifecycles;

    - subscriber information is properly authenticated (for the registration activities performed by Starfield); and
    - subordinate CA certificate requests are accurate, authenticated, and approved
- maintained effective controls to provide reasonable assurance that:
    - logical and physical access to CA systems and data is restricted to authorized individuals;
    - the continuity of key and certificate management operations is maintained; and
    - CA systems development, maintenance, and operations are properly authorized and performed to maintain CA systems integrity.

throughout the period January 1, 2025 to December 31, 2025, based on the WebTrust Principles and Criteria for Certification Authorities v2.2.2, including the following:

CA Business Practices Disclosure

- Certificate Policy (CP) and Certificate Practice Statement (CPS)

CA Business Practices Management

- Certificate Policy and Certificate Practice Statement Management

CA Environmental Controls

- Security Management
- Asset Classification and Management
- Personnel Security
- Physical and Environmental Security
- Operations Management
- System Access Management
- System Development and Maintenance
- Business Continuity Management
- Monitoring and Compliance
- Audit Logging

CA Key Lifecycle Management Controls

- CA Key Generation
- CA Key Storage, Backup, and Recovery
- CA Public Key Distribution
- CA Key Usage
- CA Key Archival and Destruction
- CA Key Compromise
- CA Cryptographic Hardware Lifecycle Management

Subscriber Key Lifecycle Management Controls

- Requirements for Subscriber Key Management

Certificate Lifecycle Management Controls

- Subscriber Registration
- Certificate Renewal
- Certificate Rekey
- Certificate Issuance
- Certificate Distribution
- Certificate Revocation
- Certificate Validation

Subordinate CA Certificate Lifecycle Management Controls

- Subordinate CA Certificate Lifecycle Management

Starfield does not escrow its CA keys, does not provide subscriber key generation services, subscriber key storage and recovery services, integrated circuit card lifecycle management, and does not provide certificate suspension services. Accordingly, our assertion does not extend to controls that would address those criteria.

GoDaddy has disclosed the following matters publicly on Mozilla's Bugzilla platform. These matters were included below due to being open during the period January 1, 2025 to December 31, 2025.

Bug ID	Summary	Opened	Closed	Resolution
1924992	Does Not Provide a Method for Domain Owners to Revoke Their Certificates	10/16/2024	4/2/2025	Closed
1949895	Delayed CRL File Updates	2/21/2025	5/8/2025	Closed
1942877	Delayed Revocation	1/21/2025	5/8/2025	Closed
1942241	Revocation Process is Unusable Due to Contact Address Not Accepting Attachments	1/16/2025	5/8/2025	Closed
2002402	Missing R1 Intermediate Full CRL URLs in CCADB	11/25/2025	1/13/2026	Closed
2004845	CA Certificates Published in PEM Format	12/8/2025	Pending	Open
2007216	CRL Disclosure in CCADB Mismatch with Issued Certificates	12/19/2025	Pending	Open
2007217	Partitioned CRL Files Missing Issuing Distribution Point	12/19/2025	Pending	Open

In addition, Certain CAs disclosed in the Starfield CP/CPS were not included in the publicly available repository as required under Control 6.5 of the WebTrust Principles and Criteria for Certification Authorities v2.2.2. Starfield added the certificates to the publicly available repository in August 2025. These roots were constrained and never operationalized, did not issue certificates, and had no impact on relying parties or certificate subscribers.

Sarath Geethakumar

Sarath Geethakumar
Chief Information Security Officer
Starfield Technologies, LLC
February 24, 2026

APPENDIX A

STARFIELD'S ROOT, CROSS-SIGNED, AND ISSUING CAS

Starfield's Root CAs

Root CA	Subject Common Name	SHA256 Fingerprint
Go Daddy Class 2 Certification Authority	Not applicable.	C3846BF24B9E93CA64274C0EC67C1ECC5E024FFCACD2D74019350E81FE546AE4
Go Daddy Root Certificate Authority - G2	Go Daddy Root Certificate Authority - G2	45140B3247EB9CC8C5B4F0D7B53091F73292089E6E5A63E2749DD3ACA9198EDA
Starfield Class 2 Certification Authority	Not applicable.	1465FA205397B876FAA6F0A9958E5590E40FCC7FAA4FB7C2C8677521FB5FB658
Starfield Root Certificate Authority - G2	Starfield Root Certificate Authority - G2	2CE1CB0BF9D2F9E102993FBE215152C3B2DD0CABDE1C68E5319B839154DBB7F5
Starfield Services Root Certificate Authority	Starfield Services Root Certificate Authority	B5BD2CB79CBD1907298D6BDF4842E516D8C78FA6FC96D25F71AF814E16CC245E
Starfield Root Certificate Authority - G5	Starfield Root Certificate Authority - G5	414F6C10FA816561832751BDB241ED8AE2BB0E2EBE651DE48E317ABB774E38F0
Starfield Root Certificate Authority - G6	Starfield Root Certificate Authority - G6	FDB2C428AC393FD61B386497E0CC6652D71F35F6683C8E0AD0E754CF8F133D2A
GoDaddy Root Certificate Authority - G5	GoDaddy Root Certificate Authority - G5	E0562C0CD4CD5959DB2AB9D8E7426B248FD75534F5D50CFAF8CB312239F93086
GoDaddy Root Certificate Authority - G6	GoDaddy Root Certificate Authority - G6	DB3C05E9C55D5259B057474D7F7F3E54A2A51AFAA71EC5C41D8C3CBE68108799
GoDaddy TLS Root CA – R1	GoDaddy TLS Root CA – R1	25CF3DA8E9B97ADDBF92543C2B82527C8A4E2CFF2062A6483040D4B64ACE719F
Starfield TLS Root CA – R1	Starfield TLS Root CA – R1	97366DA00BAF6730A84D1A8CBA5BAD7961C46BCE707E09241CC9C4C7E3C64F10

Starfield's Cross-Signed CAs

Root CA	Subject Common Name	SHA256 Fingerprint
Go Daddy Class 2 Certification Authority	Go Daddy Root Certificate Authority - G2	3A2FBE92891E57FE05D57087F48E730F17E5A5F53EF403D618E5B74D7A7E6ECB
Go Daddy Class 2 Certification Authority	Go Daddy Root Certificate Authority - G2	9BF58967545996194512DB6177151AFE99706AEA3DA36FEEE7AD9F8B3C0507CB

Root CA	Subject Common Name	SHA256 Fingerprint
Starfield Class 2 Certification Authority	Starfield Root Certificate Authority - G2	9F43D52E808C20AFF69E02FAAC205AAC684E6975213D6620FAC64BDE5FCAB4BC
Starfield Class 2 Certification Authority	Starfield Root Certificate Authority - G2	454040E4969070401CC35BDF7F2A4EBCE5797BB7694AE731D93A8115FD59929C
Starfield Class 2 Certification Authority	Starfield Services Root Certificate Authority - G2	2D12B619A660CEFB013271831D891213FC434E982A21568256CF4E2E86324BEA
Starfield Class 2 Certification Authority	Starfield Services Root Certificate Authority - G2	28689B30E4C306AAB53B027B29E36AD6DD1DCF4B953994482CA84BDC1ECAC996
Go Daddy Root Certificate Authority - G2	GoDaddy Secure Certificate Authority - G5	880FBC44FE71AA1BE40DB130917B1BAEC1BD889B2B3D7478EDA04728667E8B44
Starfield Root Certificate Authority - G2	Starfield Secure Certificate Authority - G5	29E502995310403685DD6258F9D04856878963042D4749C6D5D9773A310C31C0
GoDaddy Root Certification Authority – G2	GoDaddy TLS Root CA – R1	7BCB0F2F2D1031A6AF8D61BAA835D2835A3B8BCC26D94A3B048B1655FB81298C
Starfield Root Certification Authority – G2	Starfield TLS Root CA – R1	26A93D60039077654C0DDA1FB634AF5FF5C114C7AC1FD0449B1C9D2178B028FF

Starfield's Issuing CAs

Root CA	Subject Common Name	SHA256 Fingerprint
Go Daddy Root Certificate Authority - G2	Go Daddy Secure Certificate Authority - G2	973A41276FFD01E027A2AAD49E34C37846D3E976FF6A620B6712E33832041AA6
Go Daddy Class 2 Certification Authority	Go Daddy Secure Certification Authority	09ED6E991FC3273D8FEA317D339C02041861973549CFA6E1558F411F11211AA3
Starfield Root Certificate Authority - G2	Starfield Secure Certificate Authority - G2	93A07898D89B2CCA166BA6F1F8A14138CE43828E491B831926BC8247D391CC72
Starfield Class 2 Certification Authority	Starfield Secure Certification Authority	05A6DB389391DF92E0BE93FDFA4DB1E3CF53903918B8D9D85A9C396CB55DF030
Go Daddy Root Certificate Authority - G2	Go Daddy Secure Code Signing Certificate Authority - G2	EF356CC299AA637916C81A48891B5BA2F333A2064D93A89BA14F63A14AA6B251

Root CA	Subject Common Name	SHA256 Fingerprint
Go Daddy Root Certificate Authority - G2	Go Daddy Secure Extended Validation Code Signing CA - G2	9EFC910271094B886BD9A8FC9E394DBF2AE514778CB373544085AF815CABFE2D
Starfield Root Certificate Authority - G2	Starfield Secure Code Signing Certificate Authority - G2	26CFA206753E96AED7C30F5674E7C6F5A0CB2F93837AF6A1596C2F799C725385
Starfield Root Certificate Authority - G2	Starfield Secure Extended Validation Code Signing CA - G2	F41A694B3825942DB89523E9775F997DB9FA2998398DC39A74B72670DACFD468
GoDaddy TLS Root CA – R1	GoDaddy TLS Intermediate CA DV – R1v1	7A43BC7747D0633FBD90FF900C9242417C027DBDCA05AF72DA9A70E3518DBE2E
GoDaddy TLS Root CA – R1	GoDaddy TLS Intermediate CA EV – R1v1	9B0654F08DF9026CBB43A2C58BFF690D0DF4FAAA2B98A3E5F27416686FEFE365
GoDaddy TLS Root CA – R1	GoDaddy TLS Intermediate CA OV – R1v1	1655A304F080E05A1CB9B29E91F9A9D1922E271A8645EB7270F463BC3B332063
Starfield TLS Root CA – R1	Starfield TLS Intermediate CA DV – R1v1	06891C34A2E4687C630B29850CC9F6D45DED39491CF877C7246B6EC633587A2C
Starfield TLS Root CA – R1	Starfield TLS Intermediate CA EV – R1v1	CB5A1827D55838C04F9E8C8C152CA8711B026745A3255412A30173DCAB2A661A
Starfield TLS Root CA – R1	Starfield TLS Intermediate CA OV – R1v1	D25CE348C06DFD65D8D751BB94FAF7113820FD535FE1471A282EC738F3FC3CBF