

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

WEBTRUST FOR CERTIFICATION AUTHORITIES
TLS BASELINE REPORT

JULY 1, 2025 TO JUNE 30, 2026

Attestation and Compliance Services



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Table of Contents

Section 1 Independent Accountant's Report 1

Section 2 Management's Assertion 7

Attachment A
Starfield's Root CAs, Cross-Signed CAs, Issuing CAs, and Location in scope for TLS Baseline 10

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 Starfield and GoDaddy Certification Authority ("CA") operations for its locations and CA certificates as enumerated in Attachment A, Starfield has:

- disclosed its TLS certificate lifecycle management business practices in its
    - 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 Certification Practice Statement (CPS) v5.04, dated September 26, 2025;
    - Starfield CA Certificate Policy (CP) and Certification Practice Statement (CPS) v5.05, dated November 28, 2025; and
    - Starfield CA Public TLS Certificate Policy (CP) and Certification Practice Statement (CPS) v5.06, dated April 15, 2026

  including its commitment to provide TLS certificates in conformity with the CA/Browser Forum Requirements on the Starfield website, and provided such services in accordance with its disclosed practices
- maintained effective controls to provide reasonable assurance that:
    - the integrity of keys and TLS certificates it manages is established and protected throughout their lifecycles; and
    - TLS subscriber information is properly authenticated (for the registration activities performed by Starfield)
- 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 July 1, 2025 to June 30, 2026, based on the WebTrust Principles and Criteria for Certification Authorities – TLS Baseline v2.9.

The CA/Browser Forum Baseline Requirements for the Issuance and Management of Publicly-Trusted TLS Server Certificates require the CA to operate controls to adhere to the Network and Certificate System Security Requirements. The WebTrust Principles and Criteria for Certification Authorities - Network Security address this requirement and are reported on in a separate report.

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 – TLS Baseline v2.9.

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 Statement on Quality Management Standards established by the AICPA and the International Standard on Quality Management established by the International Auditing and Assurance Standards Board (IAASB) and, accordingly, maintain a comprehensive system of quality management including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

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 Certification Authority operations at its locations as enumerated in Attachment A, nor the suitability of any of Starfield's services for any customer's intended purpose.

Other Matters

We monitor sources of public disclosure, including Mozilla's Bugzilla and Wiki, for issues related to Starfield, and we have considered publicly disclosed and practitioner-identified issues of certificate mis-issuance or non-compliance in our procedures and conclusions. For the matters noted below, we performed procedures to determine

whether the facts and circumstances surrounding each issue were properly disclosed in the bug filed by the CA with Mozilla.

Without modifying our opinion, we noted the following other matters during our procedures and have considered the nature of these matters in our risk assessment and in determining the nature, timing, and extent of our procedures. This included performing procedures to understand the root cause disclosed by the CA, and if facts and circumstances noted in our examination agreed with what has been disclosed. We have also considered the procedures the CA has designed and noted if implemented properly and operated effectively, the controls would address the root cause. We did not perform any procedures subsequent to this report as to the effectiveness of the controls implemented.

Matter Topic		Matter Description
1	CA Certificates Published in PEM format	Bugzilla **#2004845:** The AIA CA Issuer URI for the Starfield TLS Root CA – R1 served the issuer certificate in a non-conforming file format (PEM rather than the required DER encoding), contrary to RFC 5280 §4.2.2.1 and CA/Browser Forum Baseline Requirements §7.1.2.10.3. Certificates remained valid and functioned normally; the matter was limited to file-format compliance. In response, Starfield updated the CA certificate generation procedures and review playbook to require explicit validation that all Authority Information Access (AIA) issuer URLs resolve to correctly DER-encoded CA certificate files. Additionally, monitoring controls have been configured across hosted CA certificate repositories to continuously verify that URLs serve the expected certificate, including checks for proper DER encoding and SHA-256 thumbprint validation. Schellman tested the updated CA certificate generation procedures, review playbook and monitoring controls from January 29, 2026, to June 30, 2026, and noted that the controls sufficiently addressed the root cause.
2	Missing R1 Intermediate Full CRL URLs in CCADB	Bugzilla **#2002402:** CRL URLs were missing from CCADB for the GoDaddy and Starfield R1 intermediate certificates, contrary to CCADB policy §6.2. Certificate validity, revocation functionality, and end-user trust functioned normally as full CRLs were properly generated; the matter was limited to the disclosure of the CRL URLs within CCADB. In response, GoDaddy updated the entries for the R1 Intermediate certificates in CCADB with the full CRL distribution URLs. GoDaddy also updated their internal playbook to require the entry of full CRL distribution points for new CA certificates into CCADB. Schellman reviewed the CCADB database and tested the updated internal playbook from December 9, 2025, to June 30, 2026, and noted that the controls sufficiently addressed the root cause. Additionally, Schellman noted that no additional TLS CA certificates were generated since the R1 Intermediate certificates.

Matter Topic		Matter Description
3	CRL Disclosure in CCADB Mismatch with Issued Certificates	Bugzilla **#2007216**: A mismatch existed between the CRL disclosure in CCADB (Full CRL list) and what was listed in the leaf certificates (Partitioned CRL List), contrary to CCADB policy version 2.0. Certificate validity, revocation functionality, and end-user trust functioned normally; the matter was limited to a CCADB disclosure inconsistency. In response, GoDaddy updated CCADB to include the full JSON array of partitioned CRL files. Where CCADB limitations prevented the full publication of the partitioned CRL JSON array, GoDaddy published the authoritative CRL URL dataset in their public GitHub repository. Additionally, GoDaddy has implemented a full CCADB policy review, monthly verification of disclosure accuracy, and enhanced monitoring of root and intermediate certificate data to proactively detect inconsistencies. Further, GoDaddy is actively migrating issuance from the intermediate CAs where the partitioned CRL JSON array could not be fully published to a Root Hierarchy that permits full publishing. Schellman reviewed the CCADB database, the GoDaddy public GitHub repository, updated monitoring and review controls, and the active issuance migration plan as of June 30, 2026. Schellman has considered the procedures the CA has designed and noted if implemented properly and operated effectively, the controls would address the root cause.
4	Partitioned CRL files missing Issuing Distribution Point	Bugzilla **#2007217**: A configuration change caused partitioned CRL files to be generated without the required Issuing Distribution Point extension, contrary to CA/Browser Forum Baseline Requirements §7.2.2.1. Certificate validity, revocation functionality, and end-user trust functioned normally; the matter was limited to a compliance deviation in CRL structure. In response, GoDaddy re-enabled the configuration responsible for including the IDP extension and regenerated affected CRLs. Additionally, GoDaddy hard-coded CRL generation logic for inclusion of the IDP extension and reviewed compliance-impacting functionality to eliminate reliance on configurable properties. Further, GoDaddy integrated automated linting into the CRL generation process to enable validation of CRL structure prior to publication. Schellman tested the updated CRL generation logic configurations and automated linting controls from April 1, 2026, to June 30, 2026, and noted that the controls sufficiently addressed the root cause.

Use of the WebTrust seal

Starfield's use of the WebTrust for Certification Authorities – TLS Baseline 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, United States of America
July 27, 2026

SECTION 2

MANAGEMENT'S ASSERTION

MANAGEMENT'S ASSERTION

Starfield Technologies, LLC ("Starfield"), a subsidiary of GoDaddy, Inc. ("GoDaddy") operates the Certification Authority ("CA") services as enumerated in Attachment A and provides TLS CA services.

The management of Starfield is responsible for establishing and maintaining effective controls over its TLS CA operations, including its network and certificate security system controls, its TLS CA business practices disclosure on its website, TLS key lifecycle management controls, and TLS 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 TLS CA services. Based on that assessment, in providing its TLS CA services at its locations as enumerated in Attachment A, Starfield has:

- disclosed its TLS certificate lifecycle management business practices in its:
    - 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 Certification Practice Statement (CPS) v5.04, dated September 26, 2025;
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  including its commitment to provide TLS certificates in conformity with the CA/Browser Forum Requirements on the Starfield website, and provided such services in accordance with its disclosed practices
- maintained effective controls to provide reasonable assurance that:
    - the integrity of keys and TLS certificates it manages is established and protected throughout their lifecycles; and
    - TLS subscriber information is properly authenticated (for the registration activities performed by Starfield)
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throughout the period July 1, 2025 to June 30, 2026, based on the WebTrust Principles and Criteria for Certification Authorities – TLS Baseline v2.9.

Starfield has disclosed the following matters publicly on Mozilla's Bugzilla platform. These matters were included below due to being open during the period July 1, 2025 to June 30, 2026.

Bug ID	Summary	Opened	Closed	Resolution
2004845	CA Certificates Published in PEM format	12/08/2025	02/11/2026	Closed
2002402	Missing R1 Intermediate Full CRL URLs in CCADB	11/25/2025	01/13/2026	Closed
2007216	CRL Disclosure in CCADB Mismatch with Issued Certificates	12/19/2025	Pending	Open
2007217	GoDaddy: Partitioned CRL files missing Issuing Distribution Point	12/19/2025	04/17/2026	Closed



Sarath Geethakumar
Chief Information Security Officer
Starfield Technologies, LLC, a subsidiary of GoDaddy, Inc.
July 27, 2026

ATTACHMENT A

STARFIELD'S ROOT CAS, CROSS-SIGNED CAS, ISSUING CAS, AND LOCATION IN SCOPE FOR TLS BASELINE

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 Certification Authority - G2	9F43D52E808C20AFF69E02FAAC205AAC684E6975213D6620FAC64BDE5FCAB4BC
Starfield Class 2 Certification Authority	Starfield Root Certification 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
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
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

Root CA	Subject Common Name	SHA256 Fingerprint
Starfield TLS Root CA – R1	Starfield TLS Intermediate CA EV – R1v1	CB5A1827D55838C04F9E8C8C152CA8711B026745A3255412A30173DCAB2A661A
Starfield TLS Root CA – R1	Starfield TLS Intermediate CA OV – R1v1	D25CE348C06DFD65D8D751BB94FAF7113820FD535FE1471A282EC738F3FC3CBF

STARFIELD'S LOCATIONS

Location Name	Location Type	Location	In-Scope for Physical and Environmental Control Testing
GoDaddy Corporate Headquarters	Main Office	Tempe, Arizona, USA	No
Online CA Hosting 1	Data-Center 1	Phoenix, Arizona, USA	Yes
Online CA Hosting 2	Data-Center 2	Ashburn, Virginia, USA	Yes
Offline Key Storage 1	Backup/DR/Activation Materials	Scottsdale, Arizona, USA	Yes
Offline Key Storage 2	Backup/DR/Activation Materials	Phoenix, Arizona, USA	Yes
Offline Key Storage 3	Backup/DR/Activation Materials	Tempe, Arizona, USA	Yes
MPIC Servers	Cloud Provider	Asia Pacific Southeast (Singapore)	No
MPIC Servers	Cloud Provider	Asia Pacific Sount (Mumbai)	No
MPIC Servers	Cloud Provider	Europe West (Ireland)	No
MPIC Servers	Cloud Provider	Europe West (Paris)	No
MPIC Servers	Cloud Provider	US West (Oregon)	No
MPIC Servers	Cloud Provider	US East (N. Virginia)	No