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## REPORT OF THE INDEPENDENT ACCOUNTANT

To the management of Starfield Technologies, LLC (“Starfield”):

### Scope

We have examined Starfield, subsidiary of GoDaddy Inc. (“GoDaddy”), management’s [assertion](#) that for its Starfield and GoDaddy Certification Authority (“CA”) operations in Arizona and Virginia, in the United States of America, for the CAs enumerated in [Attachment B](#) in scope for SSL Baseline Requirements and Network Security Requirements, Starfield has:

- disclosed its SSL certificate lifecycle management business practices in the applicable versions of its Starfield Certificate Policy and Certification Practice Statement (“CP/CPS”) enumerated in [Attachment A](#), including its commitment to provide SSL certificates in conformity with the CA/Browser Forum Requirements on its [repository](#), and provided such services in accordance with its disclosed practices
- maintained effective controls to provide reasonable assurance that:
  - the integrity of keys and SSL certificates it manages is established and protected throughout their lifecycles; and
  - SSL subscriber information is properly authenticated
- 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
- maintained effective controls to provide reasonable assurance that it meets the Network and Certificate System Security Requirements as set forth by the CA/Browser Forum

throughout the period July 1, 2020 to June 30, 2021 based on the [WebTrust Principles and Criteria for Certification Authorities - SSL Baseline with Network Security v2.4.1](#).

### 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 - SSL Baseline with Network Security v2.4.1](#).

### Independent Accountant’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. Those standards require that we plan and perform the examination to obtain reasonable assurance about whether

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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.

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**

Because of the nature and inherent limitations of controls, Starfield’s ability to meet the aforementioned criteria may be affected. For example, controls may not prevent, or detect and correct, error, fraud, unauthorized access to systems and information, or failure to comply with internal and external policies or requirements. Also, the projection of any conclusions based on our findings to future periods is subject to the risk that changes may alter the validity of such conclusions.

### **Independent Accountant’s 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 in Arizona and Virginia, in the United States of America, nor the suitability of any of Starfield’s services for any customer’s intended purpose.

### **Other Matter**

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

Matter Topic		Matter
1	Certificate Validity	Starfield disclosed in <a href="#">Mozilla Bug 1662807</a> it issued 107 SSL certificates with validity periods greater than 398 days after the effective date for the new validity period maximum went into effect.

We have noted any instances of possible non-conformance above that are relevant to the CAs enumerated in [Attachment B](#). Starfield’s assertion notes all instances of possible non-conformance, addressed by Starfield, during the engagement period, regardless of the particular CAs enumerated in [Attachment B](#).



### **Use of the WebTrust Seal**

Starfield's use of the WebTrust for Certification Authorities - SSL Baseline with Network Security 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.

*BDO USA, LLP*

August 31, 2021



**ATTACHMENT A - CERTIFICATION PRACTICE STATEMENT AND CERTIFICATE POLICY VERSIONS IN-SCOPE**

Policy Name	Policy Version	Policy Date
<a href="#">Starfield Technologies, LLC Certificate Policy and Certification Practice Statement</a>	Version 4.11	June 15, 2021
Starfield Technologies, LLC Certificate Policy and Certification Practice Statement	Version 4.10	April 19, 2021
Starfield Technologies, LLC Certificate Policy and Certification Practice Statement	Version 4.9	October 21, 2020
Starfield Technologies, LLC Certificate Policy and Certification Practice Statement	Version 4.8	September 30, 2020
Starfield Technologies, LLC Certificate Policy and Certification Practice Statement	Version 4.7	September 1, 2020
Starfield Technologies, LLC Certificate Policy and Certification Practice Statement	Version 4.6	July 30, 2020
Starfield Technologies, LLC Certificate Policy and Certification Practice Statement	Version 4.5	July 24, 2020
Starfield Technologies, LLC Certificate Policy and Certification Practice Statement	Version 4.4	June 19, 2020



**ATTACHMENT B - IN-SCOPE CAs FOR SSL BASELINE REQUIREMENTS AND NETWORK SECURITY REQUIREMENTS**

Root CAs			
Subject	SHA2 Thumbprint	Valid From	Valid To
OU = Go Daddy Class 2 Certification Authority O = The Go Daddy Group, Inc. C = US	C3846BF24B9E93CA64274C0EC67C1ECC5E024FFCACD2D74019350E81FE546AE4	6/29/2004	6/29/2034
CN = Go Daddy Root Certificate Authority - G2 O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	45140B3247EB9CC8C5B4F0D7B53091F73292089E6E5A63E2749DD3ACA9198EDA	9/1/2009	12/31/2037
OU = Starfield Class 2 Certification Authority O = Starfield Technologies, Inc. C = US	1465FA205397B876FAA6F0A9958E5590E40FCC7FAA4FB7C2C8677521FB5FB658	6/29/2004	6/29/2034
CN = Starfield Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	2CE1CB0BF9D2F9E102993FBE215152C3B2DD0CABDE1C68E5319B839154DBB7F5	9/1/2009	12/31/2037
CN = Starfield Services Root Certificate OU = <a href="http://certificates.starfieldtech.com/repository/">http://certificates.starfieldtech.com/repository/</a> O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	B5BD2CB79CBD1907298D6BDF4842E516D8C78FA6FC96D25F71AF814E16CC245E	6/2/2008	12/31/2029



Cross-Signed Certificates			
Subject	SHA2 Thumbprint	Valid From	Valid To
CN = Go Daddy Root Certificate Authority - G2 O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	3A2FBE92891E57FE05D57087F48E730F17E5A5F53EF403D618E5B74D7A7E6ECB	1/1/2014	5/30/2031
CN = Go Daddy Root Certificate Authority - G2 OU = https://certs.godaddy.com/repository/ O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	9BF58967545996194512DB6177151AFE99706AEA3DA36FEEE7AD9F8B3C0507CB	5/3/2011	5/3/2031
CN = Starfield Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	9F43D52E808C20AFF69E02FAAC205AAC684E6975213D6620FAC64BDE5FCAB4BC	1/1/2014	5/30/2031
CN = Starfield Root Certificate Authority - G2 OU = https://certs.starfieldtech.com/repository/ O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	454040E4969070401CC35BDF7F2A4EBCE5797BB7694AE731D93A8115FD59929C	5/3/2011	5/3/2031
CN = Starfield Services Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	EB159C922A3FC2191475CA20A53816D87A38A1A79A7264789193D2F1F750E85E	1/1/2014	5/30/2031
CN = Starfield Services Root Certificate Authority - G2 OU = https://certs.starfieldtech.com/repository/ O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	A24B9440F9FCBEBB48C274C03DE7D24C5ED1CA59D2D362F29ED3B457762C75BB	5/3/2011	5/3/2031



Cross-Signed Certificates			
Subject	SHA2 Thumbprint	Valid From	Valid To
CN = Starfield Services Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	2D12B619A660CEFB013271831D891213FC434E982A21568256CF4E2E86324BEA	8/30/2009	6/28/2034
CN = Starfield Services Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	28689B30E4C306AAB53B027B29E36AD6DD1DCF4B953994482CA84BDC1ECAC996	9/2/2009	6/28/2034



Intermediate CAs			
Subject	SHA2 Thumbprint	Valid From	Valid To
serialNumber = 07969287 CN = Go Daddy Secure Certification Authority OU = http://certificates.godaddy.com/repository O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	09ED6E991FC3273D8FEA317D339C02041861973549CFA6E1558F411F11211AA3	11/16/2006	11/16/2026
CN = Go Daddy Secure Certificate Authority - G2 OU = http://certs.godaddy.com/repository/ O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	973A41276FFD01E027A2AAD49E34C37846D3E976FF6A620B6712E33832041AA6	5/3/2011	5/3/2031
serialNumber = 10688435 CN = Starfield Secure Certification Authority OU = http://certificates.starfieldtech.com/repository O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	05A6DB389391DF92E0BE93FDFA4DB1E3CF53903918B8D9D85A9C396CB55DF030	11/16/2006	11/16/2026
CN = Starfield Secure Certificate Authority - G2 OU = http://certs.starfieldtech.com/repository/ O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	93A07898D89B2CCA166BA6F1F8A14138CE43828E491B831926BC8247D391CC72	5/3/2011	5/3/2031





## STARFIELD TECHNOLOGIES, LLC MANAGEMENT'S ASSERTION

Starfield Technologies, LLC ("Starfield"), subsidiary of GoDaddy Inc. ("GoDaddy"), operates the Starfield and GoDaddy Certification Authority ("CA") services for the CAs enumerated in [Attachment B](#) in scope for SSL Baseline Requirements and Network Security Requirements and provides SSL CA services.

Starfield management has assessed its disclosures of its certificate practices and controls over its SSL CA services. Based on that assessment, in providing its SSL CA services in Arizona and Virginia, in the United States of America, Starfield has:

- disclosed its SSL certificate lifecycle management business practices in the applicable versions of its Starfield Technologies, LLC Certificate Policy and Certification Practice Statement ("CP/CPS") enumerated in [Attachment A](#), including its commitment to provide SSL certificates in conformity with the CA/Browser Forum Requirements on its [repository](#), and provided such services in accordance with its disclosed practices
- maintained effective controls to provide reasonable assurance that:
  - the integrity of keys and SSL certificates it manages is established and protected throughout their lifecycles; and
  - SSL subscriber information is properly authenticated
- 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
- maintained effective controls to provide reasonable assurance that it meets the Network and Certificate System Security Requirements as set forth by the CA/Browser Forum

throughout the period July 1, 2020 to June 30, 2021 based on the [WebTrust Principles and Criteria for Certification Authorities - SSL Baseline with Network Security v2.4.1](#).

Starfield has disclosed the following matters publicly on Mozilla Bugzilla's platform. These matters were included below due to being open during the period July 1, 2020 through June 30, 2021.

Bug ID	Summary	Opened	Closed	Resolution
<a href="#">1639798</a>	GoDaddy: Failure to revoke key-compromised certificates within 24 hours	5/20/2020	7/8/2020	Duplicate
<a href="#">1640310</a>	GoDaddy: Failure to revoke certificate with compromised key within 24 hours	5/22/2020	11/17/2020	Fixed
<a href="#">1645832</a>	GoDaddy: Expired CRLs	6/15/2020	2/23/2021	Fixed
<a href="#">1646226</a>	GoDaddy: Document Reuse Issue	6/16/2020	7/23/2020	Fixed



Bug ID	Summary	Opened	Closed	Resolution
<a href="#">1647030</a>	GoDaddy: Agreed-Upon Website Domain Validation Issue	6/19/2020	8/7/2020	Fixed
<a href="#">1662807</a>	GoDaddy: Certificates issued with validity periods greater than 398-days	9/2/2020	2/26/2021	Fixed
<a href="#">1662810</a>	GoDaddy: DV certificates with organizationalUnit field in subject	9/2/2020	10/12/2020	Fixed

DocuSigned by:

*Todd Redfoot*

8/31/2021

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Todd Redfoot

Chief Corporate Transformation Officer  
Starfield Technologies, LLC



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Subject	SHA2 Thumbprint	Valid From	Valid To
OU = Go Daddy Class 2 Certification Authority O = The Go Daddy Group, Inc. C = US	C3846BF24B9E93CA64274C0EC67C1ECC5E024FFCACD2D74019350E81FE546AE4	6/29/2004	6/29/2034
CN = Go Daddy Root Certificate Authority - G2 O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	45140B3247EB9CC8C5B4F0D7B53091F73292089E6E5A63E2749DD3ACA9198EDA	9/1/2009	12/31/2037
OU = Starfield Class 2 Certification Authority O = Starfield Technologies, Inc. C = US	1465FA205397B876FAA6F0A9958E5590E40FCC7FAA4FB7C2C8677521FB5FB658	6/29/2004	6/29/2034
CN = Starfield Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	2CE1CB0BF9D2F9E102993FBE215152C3B2DD0CABDE1C68E5319B839154DBB7F5	9/1/2009	12/31/2037
CN = Starfield Services Root Certificate OU = <a href="http://certificates.starfieldtech.com/repository/">http://certificates.starfieldtech.com/repository/</a> O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	B5BD2CB79CBD1907298D6BDF4842E516D8C78FA6FC96D25F71AF814E16CC245E	6/2/2008	12/31/2029



Cross-Signed Certificates			
Subject	SHA2 Thumbprint	Valid From	Valid To
CN = Go Daddy Root Certificate Authority - G2 O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	3A2FBE92891E57FE05D57087F48E730F17E5A5F53EF403D618E5B74D7A7E6ECB	1/1/2014	5/30/2031
CN = Go Daddy Root Certificate Authority - G2 OU = <a href="https://certs.godaddy.com/repository/">https://certs.godaddy.com/repository/</a> O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	9BF58967545996194512DB6177151AFE99706AEA3DA36FEEE7AD9F8B3C0507CB	5/3/2011	5/3/2031
CN = Starfield Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	9F43D52E808C20AFF69E02FAAC205AAC684E6975213D6620FAC64BDE5FCAB4BC	1/1/2014	5/30/2031
CN = Starfield Root Certificate Authority - G2 OU = <a href="https://certs.starfieldtech.com/repository/">https://certs.starfieldtech.com/repository/</a> O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	454040E4969070401CC35BDF7F2A4EBCE5797BB7694AE731D93A8115FD59929C	5/3/2011	5/3/2031
CN = Starfield Services Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	EB159C922A3FC2191475CA20A53816D87A38A1A79A7264789193D2F1F750E85E	1/1/2014	5/30/2031



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CN = Starfield Services Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	2D12B619A660CEFB013271831D891213FC434E982A21568256CF4E2E86324BEA	8/30/2009	6/28/2034
CN = Starfield Services Root Certificate Authority - G2 O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	28689B30E4C306AAB53B027B29E36AD6DD1DCF4B953994482CA84BDC1ECAC996	9/2/2009	6/28/2034



Intermediate CAs			
Subject	SHA2 Thumbprint	Valid From	Valid To
serialNumber = 07969287 CN = Go Daddy Secure Certification Authority OU = http://certificates.godaddy.com/repository O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	09ED6E991FC3273D8FEA317D339C02041861973549CFA6E1558F411F11211AA3	11/16/2006	11/16/2026
CN = Go Daddy Secure Certificate Authority - G2 OU = http://certs.godaddy.com/repository/ O = GoDaddy.com, Inc. L = Scottsdale S = Arizona C = US	973A41276FFD01E027A2AAD49E34C37846D3E976FF6A620B6712E33832041AA6	5/3/2011	5/3/2031
serialNumber = 10688435 CN = Starfield Secure Certification Authority OU = http://certificates.starfieldtech.com/repository O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	05A6DB389391DF92E0BE93FDFA4DB1E3CF53903918B8D9D85A9C396CB55DF030	11/16/2006	11/16/2026
CN = Starfield Secure Certificate Authority - G2 OU = http://certs.starfieldtech.com/repository/ O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	93A07898D89B2CCA166BA6F1F8A14138CE43828E491B831926BC8247D391CC72	5/3/2011	5/3/2031