CORPORATE SOCIAL RESPONSIBILITY POLICY

1. BACKGROUND

GO DADDY INDIA DOMAINS AND HOSTING SERVICES PRIVATE LIMITED ("GoDaddy") believes that its responsibility as a corporate citizen is to make a difference in the communities in which it operates. As part of that philosophy, GoDaddy believes in contributing to non-profit organizations that focus on causes which are meaningful to our business, our customers, our employees and our community. GoDaddy’s vision is to radically shift the global economy toward small, independent ventures. We partner with diverse organizations who share our commitment to equipping entrepreneurs in low-income communities with training, tools and peer networks to accelerate their journeys.

It is our endeavor to contribute to various organizations whose mission relate to technology, education and entrepreneurship. In addition to making monetary contributions, GoDaddy encourages its employees to become involved in community organizations. GoDaddy is passionate about corporate philanthropy. At GoDaddy we understand that when our communities flourish so does our business. For this reason, community outreach is ingrained in our corporate culture. We actively invest resources in the areas most important to our business, customers and employees. Through community partnerships, advocacy, and corporate giving GoDaddy makes a difference in the communities where we work, live and play. At GoDaddy helping others is a vital part of our philosophy - and we showcase this every day through our participation as leaders in our community.

2. GENERAL INTRODUCTION

The value underpinning all business actions at GoDaddy to serve the society, ensuring that all its programs integrate economic, environmental and social performance drivers. GoDaddy's focus remains steadfast on the efficient deployment and utilization of resources - people, processes and materials – in a safe environment for the businesses to run, whilst its operations and presence lead to an improvement in the quality of life of the communities it serves. An enduring legacy of sustainability, this focus is articulated in the two components of its vision – value creation and corporate citizenship.

GoDaddy operates pan-India, and sustainability initiatives and programs are implemented according to the specific needs of diverse groups. GoDaddy has always sought to address the social, economic and environmental concerns for inclusive growth and capacity building measures for all its stakeholders through its activities.

The CSR Policy has been framed keeping in mind the philosophies of the Company in Doing Good.
3. **CSR MISSION & STRATEGY**

To achieve inclusive growth in our areas of operations and neighboring communities through integrated community and rural development that is sustainable, scalable and adaptable. Further, to transform beneficiaries to become producers, entrepreneurs and customers.

4. **GUIDING PRINCIPLES**

By meaningfully engaging in socio-economic development through active expansion of liberal market, GoDaddy has continuously strived to protect, respect and provide remedy to social, ethical and environmental issues involved in the conduct of business.

GoDaddy’s CSR Policy outlined hereunder covers the objectives and reasons behind framing a robust policy. The content and substance of CSR in the business context and the relationship of ethics to concepts of corporate or enterprise social responsibility is, however, difficult to define. The purpose of this CSR Policy is to look at these concepts, primarily as manifested in Companies Act, 2013 ("Companies Act") and regulation, with a focus on governance requirements relating to administration and execution of CSR activities.

Additionally, it also provides insights into the governance model of the CSR Policy, identifies certain key building blocks for initiating and executing CSR policies. The structure and composition of the CSR Committee, its policies and execution has been discussed at length in the CSR Policy and due care has been taken, at the time of drafting the CSR Policy, to make it all-inclusive and consistent with the CSR provisions as contained in the Companies Act.

The objective of GoDaddy's CSR Policy is to ensure that the levels of economic, legal, ethical and discretionary activities of GoDaddy is in line with the values as set out under Section 135 of the Companies Act, Companies (Corporate Social Responsibility) Rules, 2014 (“CSR Rules”), Companies (Corporate Social Responsibility Policy) Amendment Rules, 2021 (“CSR Rules”) and Schedule VII of the Companies Act (“Schedule VII”) marked as Annexure-A.

5. **INTERPRETATION/DEFINITIONS**

i. “Act” means the Companies Act, 2013;

ii. “Administrative overheads” means the expenses incurred by the Company for ‘general management and administration’ of CSR functions in the Company but shall not include the expenses directly incurred for the designing, implementation, monitoring, and evaluation of a particular CSR project or programme;
iii. “Corporate Social Responsibility” or “CSR” means the activities undertaken by the Company in pursuance of the statutory obligation laid down in Section 135 of the Act in accordance with the provisions contained in CSR Rules, but shall not include the following:

- a. activities undertaken in pursuance of normal course of business of the Company;
- b. any activity undertaken by the Company outside India except for training of Indian sports personnel representing any State or Union territory at national level or India at international level;
- c. contribution of any amount directly or indirectly to any political party under section 182 of the Act;
- d. activities benefitting employees of the company as defined in clause (k) of section 2 of the Code on Wages, 2019;
- e. activities supported by the companies on sponsorship basis for deriving marketing benefits for its products or services;
- f. activities carried out for fulfilment of any other statutory obligations under any law in force in India;

iv. “CSR activities” means the activities enumerated in Schedule VII of the Act as amended from time to time;

v. “CSR Committee” means the Corporate Social Responsibility Committee of the Board referred to in Section 135 of the Act;

vi. “Net profits” means the net profit of a company as per its financial statement prepared in accordance with the applicable provisions of the Act, but shall not include the following, namely:

- a. any profit arising from any overseas branch or branches of the Company, whether operated as a separate company or otherwise; and
- b. any dividend received from other companies in India, which are covered under and complying with the provisions of Section 135 of the Companies Act.

Provided that in case of a foreign company covered under these rules, net profit means the net profit of such company as per profit and loss account prepared in terms of clause (a) of sub-section (1) of section 381, read with section 198 of the Act;
Words and expressions used and not defined in this Policy but defined in the Act or CSR Rules shall have the same meanings respectively assigned to them in the Act or CSR Rules respectively.

For GoDaddy, CSR is the commitment of its businesses to contribute to sustainable economic development by working with civil society organizations, local community and society at large to improve their lives in ways that are good for business and development. Thus, implicit in GoDaddy's understanding of CSR is the recognition of the importance of sustainable behavior where it consistently operates in a manner that increases the social impact to society and stakeholders concerned, and at the same time adheres to the CSR mandate as contained in the Companies Act.

GoDaddy is committed to the establishment and maintenance of best practices in CSR that are designed to achieve Millennium Development Goals ("MDGs") by engaging with its employees, its international parent companies, and communities at large.

GoDaddy strives to use corporate image and efforts to engage and comply more meaningfully with CSR laws and regulations, as prescribed under the Companies Act. Any system can be as good as the people who run it; and GoDaddy is blessed with talented human capital. It is GoDaddy’s belief that engaging into CSR activities could be profound as it follows a robust CSR Policy and programs.

6. CSR PROCESS

GoDaddy's CSR process contemplates following the model which balances social development with economic growth and environmental sustainability. The key assumption is that social development and economic growth are not mutually exclusive, and that CSR mission is achieved only when both the components work together in harmony.

7. POLICY STATEMENT

This CSR Policy lays down a detailed CSR framework and commitments for GoDaddy and sets forth the policies and procedures developed by GoDaddy pursuant to the CSR Rules, 2014, notified by the Central Government of India under the Companies Act and effective as of April 1, 2014, and as amended or supplemented from time to time.
GoDaddy’s involvement in CSR activities

GoDaddy shall make every endeavor to carry out CSR activities as enumerated under Annexure-A to this policy. While planning to undertake activities under CSR and/or during actual execution of CSR projects, either on its own or through any specialized agency/(ies), GoDaddy shall make every endeavor to focus on the local areas in and around where the company operates, but may also choose to implement CSR Projects or make contributions that will have benefits on a national scale as well.

The CSR spend shall be at least 2% (two per cent) of the average net profits made by GoDaddy during the immediately preceding three financial years. CSR spend either in excess or short of the requirement shall be dealt with as provided under the provisions of Section 135 of the Act and CSR Rules.

8. *FORMATION OF CSR COMMITTEE*

GoDaddy has established a Corporate Social Responsibility Committee (“CSR Committee”) to report to the Company’s Board of Directors (“Board”), which is responsible for upholding the CSR Policy and executing the related procedures outlined herein. The CSR Committee comprises of the following members:

- Ms. Nima Kelly, Ms. Erin O’Shea, Ms. Rebecca Morrow and Mr. Nikhil Arora.
- Ms. Nima Kelly shall act as the Chairperson of the CSR Committee. If not, the CSR Committee may elect a Chairperson of its meetings. If no such Chairperson is elected, or if at any meeting the Chairperson is not present within five minutes after the time appointed for holding the meeting, the members present may choose one of their members to be Chairperson of the meeting.

Further, subject to the requirements of the Companies Act, read with the rules and schedule made thereunder, the Board may alter the composition of the CSR Committee by passing appropriate resolution.

5.1 The roles and responsibilities of CSR Committee shall be as follows:

a. The CSR Committee shall formulate, monitor and recommend to the Board of Directors, a Corporate Social Responsibility Policy or any amendments therein, which shall indicate the activities to be undertaken by the Company as specified in this Policy and Schedule VII of the Companies Act 2013 and any amendments thereto;

b. The CSR Committee shall recommend the amount of expenditure to be incurred on the activities as defined in this Policy read with Schedule VII of the Act and any amendments thereto;
The CSR Committee shall recommend to the Board of Directors, the CSR projects or the programs which the Company may plan to fund / undertake, specifying the necessary details of the projects or programs and implementation schedules for the same, if any;

d. The CSR programs / projects of the Company shall be undertaken under the supervision of the CSR Committee of the Board;

e. The CSR Committee shall formulate and recommend to the Board of Directors, an annual action plan which shall include the following –

- the list of CSR projects or programmes that are approved to be undertaken in areas or subjects specified in Schedule VII of the Act;
- the manner of execution/implementation of such projects/programmes;
- the modalities of utilization of funds and implementation schedules for the projects of programmes;
- monitoring and reporting mechanism for the projects or programmes;
- details of need and impact assessment, if any, for the projects undertaken by the Company; Provided that Board of Directors may alter the annual action plan at any time during the financial year, as per the recommendation of the CSR Committee, based on the reasonable justification to that effect.

f. The CSR Committee shall submit the utilization report of the approved CSR Projects to the Board of Directors every year or whenever the Committee deems fit;

g. The CSR Committee shall at all times act in a manner that is consistent with the provisions contained in this CSR Policy, the Act and CSR Rules.

Meetings of the CSR Committee

(a) Quorum of the CSR Committee meeting shall be 2 (two) members or 1/3rd of the Committee strength, whichever is higher. A duly convened meeting of the CSR Committee at which a quorum is present shall be competent to exercise all or any of the authorities, powers and discretions vested in or exercisable by the CSR Committee.

(b) No one other than the CSR Committee Chairperson and other members is entitled to vote at a meeting of the CSR Committee.
(c) The CSR Committee may, at its discretion, invite employees of the Company, Advisors / Consultants, representatives of Social Organizations, Auditors of the Company and such other person(s) as it may consider necessary to participate in the meetings of the Committee and assist the CSR Committee in implementation of the projects or programs. However, such invitees shall not be entitled to vote at the meetings of the CSR Committee.

(d) Committee may elect a Chairperson of its meetings. If no such Chairperson is elected, or if at any meeting the Chairperson is not present within five minutes after the time appointed for holding the meeting, the members present may choose one of their members to be Chairperson of the meeting.

*GoDaddy can dissolve the CSR committee if it is not applicable as provided under the provisions of Section 135 of the Act and CSR Rules

9. CSR IMPLEMENTATION

9.1. Committee and the Board of Directors of the Company shall ensure that the CSR activities are undertaken by the Company itself or through -

a) a company established under Section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80 G of the Income Tax Act, 1961, established by the company, either singly or along with any other company; or

b) a company established under Section 8 of the Act or a registered trust or a registered society, established by the Central Government or State Government; or

c) any entity established under an Act of Parliament or a State legislature; or

d) a company established under Section 8 of the Act, or a registered public trust or a registered society, registered under section 12A and 80G of the Income Tax Act, 1961, and having an established track record of at least three years in undertaking similar activities.

9.2. Selection of CSR Partner(s)

The CSR Committee after conducting appropriate diligence of CSR Partners may recommend its selection before the Board. The CSR Committee, after receiving approval from the Board, may direct GoDaddy to make grants or contributions out of its CSR Funds to such approved CSR Partners, and, where applicable, concurrently provide such CSR Partners with directions as to how GoDaddy would like such CSR Funds to be utilized.
9.3. Monitoring and Evaluation

After making a grant or a contribution, the CSR Committee shall use reasonable efforts to monitor the usage of such CSR Funds by CSR Partners, and if required, through independent verification, to ensure compliance with any instructions given to such CSR Partners. CSR Partners shall be required to submit a detailed report of activities carried out by them to GoDaddy.

9.4. Grants/Contributions

GoDaddy may make grants or contributions of the CSR Funds to one or more CSR Partners in any given year. GoDaddy reserves the right to choose new CSR Partners in any year, and the contribution of CSR Funds to a particular CSR Partner in one year in no way guarantees that such CSR Partner will receive CSR funds from GoDaddy in any subsequent year. GoDaddy shall allocate its CSR funds each financial year in accordance with the CSR Rules, and shall retain no such amounts for its own use or in its own accounts. For the avoidance of doubt, in the event that any budget surplus does arise out of any CSR Projects or remain after all expenditures of CSR Funds have been completed in any financial year, such surplus shall not form part of the business profits of GoDaddy.

For the avoidance of doubt, the CSR activities of GoDaddy shall not include: (i) direct or indirect contributions of any of the CSR funds to any political party; (ii) any CSR activities or CSR projects otherwise conducted in the ordinary course of business of GoDaddy; (iii) any CSR activities or CSR Projects conducted solely for the benefit of employees or their families; or (iv) any CSR activities or CSR Projects conducted or intended to benefit persons outside India.

If the CSR Committee decides in any year that it wishes to recommend to the Board that GoDaddy implement and run a CSR Project in its own direct capacity, without the use or assistance of a CSR Partner, then CSR Committee shall revise the CSR Policy so as to reflect any additional requirements of the Companies Act that may apply to such CSR Project, and shall provide the Board with a detailed report on all ethical, social, legal, economic and other issues to be considered in connection therewith.

GoDaddy will not be under any obligation to make contributions to CSR activities if the profits of the Company fall below the amount mentioned in the provisions of Section 135 of the Companies Act, 2013 and rules made thereunder (including amendments from time to time).
9.5. Initial Procedures

Within the first quarter of the fiscal year, the CSR Committee shall consult with GoDaddy’s accounting team to determine the amount of CSR funds that can be made available for expenditure for that financial year. The CSR funds for each year shall be calculated in accordance with the CSR Rules as described above.

Concurrently, the CSR Committee shall determine which CSR activity or CSR activities best aligns with the GoDaddy’s social and entrepreneurial goals for that year. In making this determination, the CSR Committee shall consider, among other factors: (i) the amount of the CSR funds available; and (ii) the areas of need in which the CSR Committee believes the CSR funds may have a positive impact. The CSR Committee shall then seek to identify CSR Partners that are focused on such CSR activities.

9.6. Parameters for selecting/re-selecting CSR Partners

If GoDaddy has made grants or contributions of all or a portion of the CSR funds to a CSR Partner in any previous year, the CSR Committee may recommend to the Board that GoDaddy allocate such CSR funds to such former or current CSR Partner in any subsequent year, provided that the CSR Committee is satisfied after reasonable diligence and independent verification (if appropriate), that the CSR Projects conducted by such CSR Partner provide aid and/or support to the intended beneficiaries.

Prior to making any recommendation to the Board, the CSR Committee shall use reasonable diligence, in accordance with industry standards, in identifying and maintaining relationships with its CSR Partners and in verifying any information provided by its prospective or incumbent CSR Partners or in connection with the conduct of any CSR Projects or CSR activities. Where applicable, the CSR Committee shall discuss with prospective or incumbent CSR Partners the feasibility of (i) specific instructions the CSR Committee would propose to give regarding the expenditure of GoDaddy’s CSR funds; and (ii) monitoring mechanisms the CSR Committee would propose to use, if any, to verify compliance with such instructions.

Notwithstanding the foregoing, if in any year CSR Committee chooses the Prime Minister’s National Relief Fund, or any similar fund set up by the Central Government of India, as a CSR Partner, then no such discussions, diligence, verification or identification procedures shall be required with respect to such CSR Partner.
10. RECOMMENDATION OF CSR COMMITTEE AND ALLOCATION OF CSR FUNDS

10.1. Recommendations of the CSR Committee to the Board

Once the CSR Committee has identified appropriate CSR activities and CSR Partners for such year, and determined the amount of CSR funds available, the CSR Committee shall make a formal recommendation to the Board on various ways through which GoDaddy’s CSR funds should be allocated for that fiscal year. Such recommendation should be made in writing and contain, at a minimum, with respect to such financial year:

(i) the amount of the CSR funds available for expenditure;

(ii) those CSR activities on which the CSR Committee wishes GoDaddy to focus;

(iii) the intended beneficiaries of GoDaddy’s CSR activities;

(iv) names of the recommended CSR Partners;

(v) reasonable information with respect to each such CSR Partner’s reputation and track record to support the selection of such CSR Partner;

(vi) wherever applicable, proposed instructions to each CSR Partner on how the CSR funds should be utilized or directed within the CSR Partner’s organization; and

(vii) wherever applicable, proposed methods of monitoring such CSR Partners’ compliance with any such instructions.

These recommendations shall be signed by the Chairperson of the CSR Committee.

The Board shall review such recommendation and determine the suitability and appropriateness thereof in its sole discretion. The Board may request that the CSR Committee provide more information or conduct further diligence on any CSR Partner and may require the CSR Committee’s recommendation to be revised in any manner whatsoever, subject to the CSR Rules, be resubmitted for approval. In any event, the Board shall approve a formal recommendation of the CSR Committee by June 30th of each year. Such approved recommendations shall be kept in the books and records of the Company.
10.2. Allocating CSR Funds; Instructing and Monitoring the CSR Partners

The CSR Funds shall be allocated each year in accordance with the Board-approved CSR recommendation for such year. When disbursing CSR funds, the CSR Committee shall provide each CSR Partner with specific written instructions detailing:

(i) the specific CSR Projects within the CSR Partner’s organization towards which the Go Daddy’s CSR funds should be directed;

(ii) adjustments or modifications which GoDaddy believes may increase the efficacy of such CSR Projects, if any, including the reasons therefor;

(iii) conditions GoDaddy would like to place on the CSR Partner’s use of the CSR funds, if any; and

(iv) the manner in which the CSR Committee proposes to monitor the CSR Partner’s use of the CSR funds.

After making a grant or contribution of CSR funds to a CSR Partner, the CSR Committee may/ shall monitor such CSR Partner’s subsequent use thereof. It may choose to do so in any commercially-reasonable manner, in accordance with the recommendations made by the CSR Committee to the Board and any discussions with such CSR Partner prior to making such grant or contribution. At a minimum, the CSR Committee must ensure that each CSR Partner provides, by December 31st of each financial year, a written description of how GoDaddy’s CSR funds were utilized (a “CSR Partner Report”), or if such CSR Funds have not been utilized within such year, a written description of the CSR Partner’s intentions for such CSR funds, including a reasonable explanation as to why they were not spent that year.

In the event that a CSR Partner has accrued any kind of income through the use of GoDaddy’s CSR funds, the CSR Partner must direct such income back into its CSR Projects, and must provide evidence thereof in its CSR Partner Report.

If the CSR Committee has provided a CSR Partner with specific instructions or conditions with respect to the CSR funds as described above, such CSR Partner’s Report must also show compliance with such instructions or conditions, provided that a CSR Partner shall have no obligation to show compliance (or comply) with instructions of the CSR Committee that constitute mere suggestions.
The CSR Committee shall review each CSR Partner Report and any other information provided to it by such CSR Partner, and shall be entitled to rely on the reasonable representations of any CSR Partner, provided that the CSR Committee reserves the right to conduct reasonable diligence or seek independent verification of any such representation or information, as determined appropriate in the CSR Committee’s sole discretion. The CSR Committee, together with the Board of Directors, shall also periodically review the CSR activities of GoDaddy as a whole, to ensure that such CSR activities are related to the permissible CSR activities specified in the Companies Act and CSR Rules.

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10.3. MISCELLANEOUS

10.3.1. CSR Partners or personnel engaged to carry CSR activities are strictly prohibited to use any part of the CSR funds to provide money or gifts, or any other things of value directly or indirectly to anyone in order to improperly influence any act or decision relating to the CSR Partner or the CSR funds, including by assisting any party to secure an improper advantage.

10.3.2. All the parties shall comply with all anti-corruption laws, rules and regulations of India.

10.4. ANNUAL REPORT

For every financial year, GoDaddy shall prepare an annual report on the CSR Activities in the format set forth in Annexure-B hereto. Such report shall include, at a minimum: (i) a brief outline of the CSR Policy; (ii) the composition of the CSR Committee; (iii) the average net profit of GoDaddy for the three (3) immediately preceding financial years; and (iv) CSR funds available for such financial year, calculated in accordance with the CSR Rules. GoDaddy has been unable to spend the entire CSR funds on CSR activities or CSR Projects as envisaged under the Companies Act or CSR Rules, the report shall specify the reasons therefor.

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The CSR Policy shall at all times be subject to the approval of the Board and GoDaddy shall display the CSR Policy on GoDaddy’s website. If you have any questions on this Policy, please contact a member of the CSR Committee.
10.5. Review / Amendment

The Board may amend, abrogate, modify, or revise any or all clauses of this Policy, on recommendation of the CSR Committee (if any) and in accordance with the Act and the CSR Rules framed thereunder. In case any provision(s) of this policy is contrary to or inconsistent with the CSR Provisions, such CSR provisions shall prevail.
ANNEXURE-A

SCHEDULE VII

The Companies Act specifies that the requirements of the CSR Rules may be fulfilled through implementing programs or projects, or making contributions to certain third parties, focused on:

(i) eradicating hunger, poverty and malnutrition, promoting preventive health care including preventive health care and sanitation including contribution to the Swach Bharat Kosh set-up by the Central Government for the promotion of sanitation and making available safe drinking water;

(ii) promoting education, including special education and employment enhancing vocation skills especially among children, women, elderly, and the differently abled and livelihood enhancement projects;

(iii) promoting gender equality, empowering women, setting up homes and hostels for women and orphans; setting up old age homes, day care centres and such other facilities for senior citizens and measures for reducing inequalities faced by socially and economically backward groups;

(iv) ensuring environmental sustainability, ecological balance, protection of flora and fauna, animal welfare, agroforestry, conservation of natural resources and maintaining quality of soil, air and water including contribution to the Clean Ganga Fund set up by the Central Government for rejuvenation of river Ganga;

(v) protection of national heritage, art and culture including restoration of buildings and sites of historical importance and works of art; setting up public libraries; promotion and development of traditional arts and handicrafts;

(vi) measures for the benefit of armed forces veterans, war widows and their dependents, Central Armed Police Forces (CAPF) and Central Para Military Forces (CPMF) veterans, and their dependents including widows;

(vii) training to promote rural sports, nationally recognized sports, paralympic sports and Olympic sports;
(viii) contribution to the Prime Minister's National Relief Fund or Prime Minister's Citizen Assistance and Relief in Emergency Situations Fund (PM CARES Fund) or any other fund set up by the Central Government for socio-economic development and relief and welfare of the Scheduled Castes, the Scheduled Tribes, other backward classes, minorities and women;

(ix) (a) Contribution to incubators or research and development projects in the field of science, technology, engineering and medicine, funded by the Central Government or State Government or Public Sector Undertaking or any agency of the Central Government or State Government; and

(b) Contributions to public funded Universities; Indian Institute of Technology (IITs); National Laboratories and autonomous bodies established under Department of Atomic Energy (DAE); Department of Biotechnology (DBT); Department of Science and Technology (DST); Department of Pharmaceuticals; Ministry of Ayurveda, Yoga and Naturopathy, Unani, Siddha and Homoeopathy (AYUSH); Ministry of Electronics and Information Technology and other bodies, namely Defense Research and Development Organisation (DRDO); Indian Council of Agricultural Research (ICAR); Indian Council of Medical Research (ICMR) and Council of Scientific and Industrial Research (CSIR), engaged in conducting research in science, technology, engineering and medicine aimed at promoting Sustainable Development Goals (SDGs).]

(x) rural development projects;

(xi) slum area development;

(xii) Disaster management, including relief, rehabilitation and reconstruction activities;

(xiii) Any other programs or projects as may be notified by the Ministry of Corporate Affairs from time to time.

Explanation. — For the purposes of this item, the term ‘slum area’ shall mean any area declared as such by the Central Government or any State Government or any other competent authority under any law for the time being in force.