REPORT OF INDEPENDENT CERTIFIED PUBLIC ACCOUNTANTS

To the Management of Starfield Technologies, LLC:

Scope
We have examined the assertion by the management of Starfield Technologies, LLC ("Starfield") that in providing its Starfield and GoDaddy Certification Authority (CA) services at its Scottsdale, Arizona, USA, and Phoenix, Arizona, USA, locations, throughout the period from July 1, 2018, to June 30, 2019, for its root and subordinate CA certificates as listed in Appendix A, Starfield has:

- Disclosed its business, key life cycle management, certificate life cycle management, and CA environmental control policies and practices in its:
  - Certificate Policy and Certification Practice Statement (v4.1); and
  - Automated Domain Validation Procedures;
- Maintained effective controls to provide reasonable assurance that:
  - Starfield provides its services in accordance with its Certificate Policy and Certification Practice Statement;
- Maintained effective controls to provide reasonable assurance that:
  - The integrity of keys and certificates it manages is established and protected throughout their life cycles;
  - 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;
  - CA systems development, maintenance, and operations are properly authorized and performed to maintain CA systems integrity; and
- Maintained effective controls to provide reasonable assurance that:
  - Subscriber information was properly authenticated (for the registration activities performed by Starfield).


Starfield’s Responsibilities
Starfield’s management is responsible for its assertion. Our responsibility is to express an opinion on management’s assertion based on our examination.

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.

Independent Certified Public Accountant’s Responsibilities
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 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.

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.

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 Scottsdale, Arizona, USA, and Phoenix, Arizona, USA, locations, nor the suitability of any of Starfield’s services for any customer’s intended purpose.

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
Certified Public Accountants
Tampa, FL 33607
August 14, 2019
Starfield Technologies, LLC ("Starfield") operates the Certification Authority (CA) services known as Starfield and GoDaddy and provides CA the following services:

- Subscriber registration
- Certificate renewal
- Certificate rekey
- Certificate issuance
- Certificate distribution
- Certificate revocation
- Certificate validation

The management of Starfield is responsible for establishing and maintaining effective controls over its CA operations, including:

- Its CA business practices disclosure on its website, CA business practices management, CA environmental controls, CA key lifecycle management controls, subscriber key lifecycle management controls, and 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 provide only reasonable assurance with respect to Starfield’s CA 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 Scottsdale, Arizona, USA, and Phoenix, Arizona, USA, locations, throughout the period from July 1, 2018, to June 30, 2019, for its root and subordinate CA certificates as listed in Appendix A, Starfield has:

- Disclosed its business, key life cycle management, certificate life cycle management, and CA environmental control policies and practices in its:
  - Certificate Policy and Certification Practice Statement (v4.1); and
  - Automated Domain Validation Procedures;

- Maintained effective controls to provide reasonable assurance that:
  - Starfield provides its services in accordance with its Certificate Policy and Certification Practice Statement;

- Maintained effective controls to provide reasonable assurance that:
  - The integrity of keys and certificates it manages is established and protected throughout their life cycles;
  - 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;
  • CA systems development, maintenance, and operations are properly authorized and performed to maintain CA systems integrity; and

• Maintained effective controls to provide reasonable assurance that:
  • Subscriber information was properly authenticated (for the registration activities performed by Starfield).

Based on the WebTrust Principles and Criteria for Certification Authorities - Version 2.1 including the following:

**CA Business Practices Disclosure**

• Certificate Policy and Certification Practice Statement

**CA Business Practices Management**

• Certificate Policy and Certification Practice Statement Management

**CA Environmental Controls**

• Security Management
• Asset Classification and Management
• Personnel Security
• Physical and Environmental Security
• Operations Management
• System Access Management
• Systems 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 Life Cycle Management

**Subscriber Key Lifecycle Management Controls**

• Requirements for Subscriber Key Management
Certificate Life Cycle Management Controls

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

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

Nima Kelly
Chief Legal Officer
Starfield Technologies, LLC
August 14, 2019
## APPENDIX A – STARFIELD AND GODADDY ROOT AND ISSUING CAs

<table>
<thead>
<tr>
<th>Name</th>
<th>Certificate Thumbprint (sha256)</th>
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<tbody>
<tr>
<td>Name</td>
<td>Certificate Thumbprint (sha256)</td>
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† The cross-signed certificates were signed with a key controlled by Starfield, and the certificates are subject to the Starfield CP/CPS. While the cross-signing establishes a trusted relationship, the examination by Schellman & Company, LLC did not extend to the controls exercised or certificates issued by any third parties or external registration authorities.