

Code of Conduct Exemption Request Form

August 5, 2019

Internet Corporation for Assigned Names and Numbers (“ICANN”)
12025 Waterfront Drive, Suite 300
Los Angeles, California 90094
Attention: New gTLD Program Staff

RE: Request for Exemption from Registry Operator Code of Conduct - SCHOLARSHIPS

Scholarships.com, LLC (“Registry Operator”), in connection with the execution of the Registry Agreement for the .Scholarships TLD (the “Registry Agreement”), hereby requests an exemption from the obligations of the Registry Operator Code of Conduct set forth in Specification 9 to the Registry Agreement (the “Code of Conduct”). Pursuant to such request, Registry Operator confirms that each of the following statements is true and correct (collectively, referred to as the “Statements”):

1. All domain name registrations in the TLD are registered to, and maintained by, Registry Operator for the exclusive use of Registry Operator or its Affiliate (as defined in the Registry Agreement);
2. Registry Operator does not sell, distribute or transfer control or use of any registrations in the TLD to any third party that is not an Affiliate of Registry Operator; and
3. Application of the Code of Conduct to the TLD is not necessary to protect the public interest for the following reasons:

The TLD would provide Scholarships.com with the opportunity to extend our brand and reputation through the management of a dedicated domain name space for a trusted scholarship resource service.

Since the only registrants will be Registry Operator and its Affiliates, there is no need for a Code of Conduct to protect other registrants.

Granting the Exemption Request will not materially affect third parties nor will it be perceived as unfair to the general Internet community. To the contrary, Registry Operator’s use of the TLD will provide Scholarships.com with an opportunity to expand its reputation as a trusted web space making it easier for Internet users to identify Scholarships.com’s online tools and services. The TLD will provide a trusted environment where domain names and content can be expanded and visitors can be assured a safe browsing experience backed by Scholarships.com.

Scholarships.com, the Registry Operator, is well positioned to support the TLD by leveraging its expertise in building and managing web properties. Partnered with a best

in class back end registry services provider with a proven record of offering back end registry services, Scholarships.com can guarantee industry-leading uptime.

Scholarships.com, as the Registry Operator, will take great care to ensure that users' needs are served and that users receive a high level of quality, speed, and service backed by Scholarships.com and its 20+ years of experience managing web properties.

Registry Operator represents that the registration policies attached hereto as Exhibit A are a true and correct copy of the Registry Operator's registration policies for the TLD. Registry Operator agrees to notify ICANN promptly in writing in the event any of the Statements has become untrue (whether before or after an exemption has been granted). Registry Operator further acknowledges and agrees that the Exemption will be void if at any time any of the Statements has become untrue.

Submitted by: [REDACTED]
Position: Chief Technology Officer
Date Noted: 8/5/2019
Email: [REDACTED]

Exhibit A

Registry Operator hereby acknowledges that the following are the true and correct registration policies for the TLD:

Domain names may only be registered to Scholarships.com, LLC and its affiliates. Any registrant of a letter/letter two-character ASCII label represents that it will take steps to ensure against misrepresenting or falsely implying that the registrant or its business is affiliated with a government or country-code manager if such affiliation, sponsorship or endorsement does not exist.