

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

RE: .ARAMCO Request for Exemption from Registry Operator Code of Conduct

To Whom it May Concern:

Aramco Services Company, a subsidiary of Saudi Aramco, ("Registry Operator"), in connection with the execution of the Registry Agreement for the .aramco 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:

Aramco Services Company will develop and implement policies to ensure that only Saudi Aramco and its affiliates can own or operate domains under the .aramco gTLD. As there will be no registrants other than Registry Operator and its affiliates the registrant protection mechanisms comprised within the Registry Operator Code of Conduct are not necessary within the context of the .aramco TLD.

Conversely, operating Saudi Aramco.aramco in a closed manner will benefit the Internet community, by clarifying to the general public and to Internet search engines what is an official Saudi Aramco-affiliated website. New gTLD create an opportunity to unify Saudi Aramco's projects and affiliates under a single domain name, in turn, creating a safe, secure, and trusted space for our consumers. Further, this model will allow Saudi Aramco to be operating in a manner that is virtually free from intellectual property infringement.

Registry Operator represents that the registration policies attached hereto as Schedule 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: 

Position: _____ Contracting Representative _____

Date Noted: _____ 9/4/2014 _____

Email: _____  _____

Schedule A

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

.ARAMCO Registration Policies

The .ARAMCO TLD will be managed and operated exclusively by Aramco Services Company; registration and operation of domain names under .ARAMCO will be restricted to Saudi Aramco and its qualified affiliates.

Aramco Services Company will implement the following registration policies:

- .ARAMCO Domain Name Eligibility Requirements
- Acceptable Use Policy
- Rights Protection Mechanisms
- Privacy

1. .ARAMCO Domain Name Eligibility Requirements

The .ARAMCO Domain Registration Eligibility policy sets forth guidelines for what domain names may be registered in the .ARAMCO TLD, as well as which individuals or entities may register or control the DNS records associated with these domains. Aramco Services Company, a wholly owned subsidiary of Saudi Aramco, will implement the following policies, which will ensure that the .ARAMCO TLD is used exclusively by Saudi Aramco and its Affiliates.

Only Saudi Aramco and its qualified affiliates will be allowed to request domain registrations in the .ARAMCO TLD. Saudi Aramco will develop an internal process that will define how qualified individuals and entities can submit registration requests and the process by which such registrations will be approved and executed upon by Aramco Services Company.

Saudi Aramco's internal domain management department will be responsible for the receipt of domain name registration requests from specially designated and approved domain name managers (Domain Managers) through a documented internal request form. Once the Domain Manager receives a registration request, an internal review will be completed to ensure the name complies with internal naming criteria and registration policies, as well as with the specifications described in the ICANN Registry Agreement. Once the name has undergone the standard review and is deemed in compliance with internal rules and procedures, the name will be approved and submitted through a 2013 ICANN-Accredited Registrar for registration.

Upon registration, only Saudi Aramco and its qualified Affiliates will be able to control the DNS records associated with domain names in the .ARAMCO TLD.

Aramco Services Company reserves the right to modify its Domain Name Eligibility Requirements in its sole discretion and without prior notice, as well as the internal procedures established for requesting, approving, and registering names in the .ARAMCO TLD. Aramco Services Company will promptly notify its Domain Managers and .ARAMCO registrants of any

changes to the Domain Name Eligibility Requirements. Aramco Services Company will promptly notify Domain Managers in the event of changes to its internal registration procedures.

2. Acceptable Use Policy

This Acceptable Use Policy sets forth the criteria and procedures by which Aramco Services Company ("Registry Operator") can quickly lock, cancel, suspend, transfer or take ownership of a name in the .ARAMCO TLD, either temporarily or permanently. The Acceptable Use policy may be invoked if a domain name in the .ARAMCO TLD is being used in a manner that appears to threaten the stability, integrity or security of the .ARAMCO Registry or in a fashion that may put the safety and security of a .ARAMCO registrant or user at risk. The process also allows the Registry Operator to take preventive measures to avoid criminal or security threats.

The Acceptable Use Policy may be triggered through a variety of channels, including, among others, private complaint, public alert, government or law enforcement agency outreach, or on-going monitoring by the Registry or its partners. In all cases, Registry Operator or its designees will alert the sponsoring registrar(s) about any identified threats.

The following are some (but not all) activities that may trigger rapid domain compliance:

Phishing: the attempt by a third party to acquire personally identifiable information by masquerading as an Aramco website.

Pharming: the redirection of Internet users to websites other than those the user intends to visit, usually through unauthorized changes to the Hosts file on a victim's computer or DNS records in DNS servers.

Dissemination of Malware: the intentional creation and distribution of "malicious" software designed to infiltrate a computer system without the owner's consent, including, without limitation, computer viruses, worms, key loggers, and Trojans.

Fast Flux Hosting: a technique used to shelter Phishing, Pharming and Malware sites and networks from detection and to frustrate methods employed to defend against such practices, whereby the IP address associated with fraudulent websites are changed rapidly so as to make the true location of the sites difficult to find.

Botnetting: the development and use of a command, agent, motor, service, or software which is implemented: (1) to remotely control the computer or computer system of an Internet user without their knowledge or consent, (2) to generate direct denial of service (DDOS) attacks.

Malicious Hacking: the attempt to gain unauthorized access (or exceed the level of authorized access) to a computer, information system, user account or profile, database, or security system.

Child Pornography: the storage, publication, display and/or dissemination of pornographic materials depicting individuals under the age of majority in the relevant jurisdiction.

Aramco Services Company reserves the right, in its sole discretion, to take any administrative and operational actions necessary, including, but not limited to, the use of computer forensics and information security technological services in order to implement the Acceptable Use Policy. In addition, Aramco Services Company reserves the right to deny, cancel, suspend, transfer, or otherwise alter any registration or transaction, or to place any domain name(s) on registry lock, hold or similar status, that it deems necessary, in its discretion (1) to protect the integrity and stability of the registry; (2) to comply with any applicable laws, government rules or requirements, requests of law enforcement, or any dispute resolution process; (3) to avoid any liability, civil or criminal, on the part of Registry Operator as well as its affiliates, subsidiaries, officers, directors, and employees; (4) to enforce the terms of the registration agreement or (5) to correct mistakes made by Registry Operator or any Registrar in connection with a domain name registration. Aramco Services Company also reserves the right to place upon registry lock, hold or similar status a domain name during resolution of a dispute or court proceeding or (5) to enforce the .ARAMCO Domain Eligibility Requirements.

Aramco Services Company Reserves the right to modify its Acceptable Use Policies without prior notice and in its sole discretion. Aramco Services Company will promptly notify its Domain Managers and .ARAMCO registrants of any changes to its Acceptable Use Policies.

3. Rights Protection Mechanisms

Aramco Services Company is committed to following all mandatory ICANN rights protection mechanisms aimed at protecting third party intellectual property rights within the .ARAMCO TLD. Aramco Services Company plans to limit the registration and control of DNS records associated with .ARAMCO domain names to Saudi Aramco and its qualified affiliates; therefore, it is highly unlikely that names under .ARAMCO infringe upon with the intellectual property rights of third parties.

Nevertheless, Aramco Services Company plans to implement all Rights Protection Mechanisms (RPMs) as required by ICANN.

4. Privacy

Aramco Services Company will ensure that the operation of the .ARAMCO TLD is consistent with Saudi Aramco's Privacy Policy, available on its website at <http://www.jobsataramco.eu/privacy-statement>.

Mission:

Aramco Services Company is the wholly-owned US subsidiary of Saudi Arabian Oil Company (“Saudi Aramco”) and the applicant for the .ARAMCO new gTLD and its Arabic equivalent. Our acquisition of these new gTLDs will serve several purposes, chief among them the unification of our global network of affiliates under a common identity.

Saudi Aramco is involved in a diverse array of businesses in Saudi Arabia, North America, Europe and Asia. We are moving into new areas of business, including ventures with global chemicals and refining companies, and also are expanding our efforts in Saudi Arabia to promote new business development, entrepreneurship and sustainability programs such as energy efficiency and environmental awareness. New gTLDs create the opportunity to gather all of these affiliates and programs under one unified domain name. This creates a stronger identity for Saudi Aramco, domestically and globally, clarifies the scope and scale of our operations and the breadth and reach of our corporate social responsibility programs. In addition, operating the .ARAMCO gTLD provides us with the ability to add a significant number of second-level domain names as Saudi Aramco continues to expand its activities.

Saudi Aramco will develop and implement policies to ensure that only genuine its employees, affiliates, and trademark licensees can own or operate domains under the .ARAMCO gTLD. This will clarify to the general public and to Internet search engines what is an official Saudi Aramco-affiliated website and what is not. Saudi Aramco frequently confronts the issue of other companies or individuals setting up websites that claim to represent Saudi Aramco. These non-sanctioned and unaffiliated websites can potentially damage our reputation and image and, in some cases, are designed with the purpose of committing fraud.

.ARAMCO Registration Policies

The .ARAMCO TLD will be managed and operated exclusively by Aramco Services Company; registration and operation of domain names under .ARAMCO will be restricted to Saudi Aramco and its qualified affiliates and trademark licensees.

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1. .ARAMCO Domain Name Eligibility Requirements
2. Acceptable Use Policy
3. Rights Protection Mechanisms
4. Privacy

1. .ARAMCO Domain Name Eligibility Requirements

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Only Saudi Aramco and its qualified affiliates, and trademark licensees will be allowed to request domain registrations in the .ARAMCO TLD. Saudi Aramco will develop an internal process that will define how qualified individuals and entities can submit registration requests and the process by which such registrations will be approved and executed upon by Aramco Services Company.

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Upon registration, only Saudi Aramco and its qualified Affiliates and Licensees will be able to control the DNS records associated with domain names in the .ARAMCO TLD.

Aramco Services Company reserves the right to modify its Domain Name Eligibility Requirements in its sole discretion and without prior notice, as well as the internal procedures established for requesting, approving, and registering names in the .ARAMCO TLD. Aramco Services Company will promptly notify its Domain Managers and .ARAMCO registrants of any changes to the Domain Name Eligibility Requirements. Aramco Services Company will promptly notify Domain Managers in the event of changes to its internal registration procedures.

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- Botnetting: the development and use of a command, agent, motor, service, or software which is implemented: (1) to remotely control the computer or computer system of an Internet user without their knowledge or consent, (2) to generate direct denial of service (DDOS) attacks.
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operational actions necessary, including, but not limited to, the use of computer forensics and information security technological services in order to implement the Acceptable Use Policy. In addition, Aramco Services Company reserves the right to deny, cancel, suspend, transfer, or otherwise alter any registration or transaction, or to place any domain name(s) on registry lock, hold or similar status, that it deems necessary, in its discretion (1) to protect the integrity and stability of the registry; (2) to comply with any applicable laws, government rules or requirements, requests of law enforcement, or any dispute resolution process; (3) to avoid any liability, civil or criminal, on the part of Registry Operator as well as its affiliates, subsidiaries, officers, directors, and employees; (4) to enforce the terms of the registration agreement or (5) to correct mistakes made by Registry Operator or any Registrar in connection with a domain name registration. Aramco Services Company also reserves the right to place upon registry lock, hold or similar status a domain name during resolution of a dispute or court proceeding or (5) to enforce the .ARAMCO Domain Eligibility Requirements.

Aramco Services Company Reserves the right to modify its Acceptable Use Policies without prior notice and in its sole discretion. Aramco Services Company will promptly notify its Domain Managers and .ARAMCO registrants of any changes to its Acceptable Use Policies.

Aramco Services Company is committed to following all mandatory ICANN rights protection mechanisms aimed at protecting third party intellectual property rights within the .ARAMCO TLD. Aramco Services Company plans to limit the registration and control of DNS records associated with .ARAMCO domain names to Saudi Aramco and its qualified affiliates and licensees; therefore, it is highly unlikely that names under .ARAMCO infringe upon with the intellectual property rights of third parties.

Nevertheless, Aramco Services Company plans to implement all Rights Protection Mechanisms (RPMs) as required by ICANN, including:

- Implementation of the Trademark Claims Process
- Implementation of the Uniform Dispute Resolution Policy (UDRP)
- Implementation of the Uniform Rapid Suspension (URS) mechanism

4. Privacy

Aramco Services Company will ensure that the operation of the .ARAMCO TLD is consistent with Saudi Aramco's Privacy Policy, available on its website at <http://www.jobsataramco.eu/privacy-statement>.