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## REPORT OF THE INDEPENDENT ACCOUNTANT

To the management of Amazon Trust Services, LLC ("ATS"):

We have examined ATS management's <u>assertion</u> that for its Certification Authority ("CA") operations in the United States of America, throughout the period January 16, 2016 to January 15, 2017 for its root CAs known as Amazon Root CA 1, Amazon Root CA 2, Amazon Root CA 3, Amazon Root CA 4, Starfield Services Root Certificate Authority - G2 and other CAs listed in <u>Appendix A</u> in scope for SSL Baseline Requirements and Network Security Requirements ATS has:

- disclosed its SSL certificate lifecycle management business practices in its:
  - o Amazon Trust Services Certificate Policy v1.0.4; and
  - o Amazon Trust Services Certification Practice Statement v1.0.5,

including its commitment to provide SSL certificates in conformity with the CA/Browser Forum Requirements on the ATS <u>website</u>, 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;
  - o 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

based on the WebTrust Principles and Criteria for Certification Authorities - SSL Baseline with Network Security, Version 2.0.

ATS' management is responsible for its assertion. Our responsibility is to express an opinion on management's assertion based on our examination.

We conducted our examination in accordance with standards for attestation engagements established by the American Institute of Certified Public Accountants and, accordingly, included:



- (1) obtaining an understanding of ATS' SSL certificate lifecycle management business practices, including its relevant controls over the issuance, renewal, and revocation of SSL certificates, and obtaining an understanding of ATS' network and certificate system security to meet the requirements set forth by the CA/Browser Forum;
- (2) selectively testing transactions executed in accordance with disclosed SSL certificate lifecycle management practices;
- (3) testing and evaluating the operating effectiveness of the controls; and
- (4) performing such other procedures as we considered necessary in the circumstances.

We believe that our examination provides a reasonable basis for our opinion.

The relative effectiveness and significance of specific controls at ATS 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. We have performed no procedures to evaluate the effectiveness of controls at individual subscriber and relying party locations.

Because of the nature and inherent limitations of controls, ATS' 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.

In our opinion, throughout the period January 16, 2016 to January 15, 2017, ATS management's assertion, as referred to above, is fairly stated, in all material respects, based on the WebTrust Principles and Criteria for Certification Authorities - SSL Baseline with Network Security, Version 2.0.

This report does not include any representation as to the quality of ATS' services beyond those covered by the WebTrust Principles and Criteria for Certification Authorities - SSL Baseline with Network Security, Version 2.0, nor the suitability of any of ATS' services for any customer's intended purpose.

ATS' 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

Certified Public Accountants St. Louis, Missouri March 28, 2017



## **Amazon Trust Services LLC Management's Assertion**

March 28, 2017

Amazon Trust Services LLC ("ATS") operates the Certification Authorities ("CAs") known as Amazon Root CA 1, Amazon Root CA 2, Amazon Root CA 3, Amazon Root CA4, Starfield Services Root Certificate Authority - G2 and other CAs as listed in <a href="Appendix A">Appendix A</a> in scope for SSL Baseline Requirements and Network Security Requirements and provides SSL CA services.

The management of ATS is responsible for establishing and maintaining effective controls over its SSL CA operations, including its network and certificate security system controls, its SSL CA business practices disclosure on its <a href="website">website</a>, SSL key lifecycle management controls, and SSL 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 only provide reasonable assurance with respect to ATS' Certification Authority operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

ATS management has assessed its disclosures of its certificate practices and controls over its SSL CA services. Based on that assessment, in ATS management's opinion, in providing its SSL CA services in the United States of America, throughout the period January 16, 2016 to January 15, 2017, ATS has:

- disclosed its SSL certificate lifecycle management business practices in its:
  - o Amazon Trust Services Certificate Policy v1.0.4; and
  - o Amazon Trust Services Certification Practice Statement v1.0.5,

including its commitment to provide SSL certificates in conformity with the CA/Browser Forum Requirements on the ATS website, and provided such services in accordance with its disclosed practices

- maintained effective controls to provide reasonable assurance that:
  - o 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:
  - o logical and physical access to CA systems and data is restricted to authorized individuals:
  - o the continuity of key and certificate management operations is maintained; and
  - o 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

based on the <u>WebTrust Principles and Criteria for Certification Authorities - SSL Baseline with</u> Network Security, Version 2.0.

Jonathan Kozolchyk

Jonathan Kozolchyk Vice President Amazon Trust Services LLC

## APPENDIX A - IN-SCOPE CAS

Root CAs	SHA-256 Hash of Subject Public
	Key Information
CN=Amazon Root CA 1,O=Amazon,C=US	fbe3018031f9586bcbf41727e417b7d1
	c45c2f47f93be372a17b96b50757d5a2
CN=Amazon Root CA 2,O=Amazon,C=US	7f4296fc5b6a4e3b35d3c369623e364a
	b1af381d8fa7121533c9d6c633ea2461
CN=Amazon Root CA 3,O=Amazon,C=US	36abc32656acfc645c61b71613c4bf21
	c787f5cabbee48348d58597803d7abc9
CN=Amazon Root CA 4,O=Amazon,C=US	f7ecded5c66047d28ed6466b543c40e0
	743abe81d109254dcf845d4c2c7853c5
CN=Starfield Services Root Certificate Authority - G2,O=Starfield Technologies	2b071c59a0a0ae76b0eadb2bad23bad4
Inc.,L=Scottsdale,ST=Arizona,C=US	580b69c3601b630c2eaf0613afa83f92

Other CAs	SHA-256 Hash of Subject Public
	Key Information
CN=Amazon,OU=Server CA 0A,O=Amazon,C=US	b58539ecaa13921ccdb80d38d34875fd
	e6471c5a159d9beef2fa6f99983bd611
CN=Amazon,OU=Server CA 1A,O=Amazon,C=US	64bb5bd80311fa3f53bd99404cab8762
	ad6e048447d0a97f219fceca1661f37c
CN=Amazon,OU=Server CA 2A,O=Amazon,C=US	1bda5afff83781380bf708198f9f7d2d
	b1e067f14bb9ea7bae70aac0b0305e7b
CN=Amazon,OU=Server CA 3A,O=Amazon,C=US	7c53b5df79135d9af6195ef6bb73ab98
	c2c89950b892b192dffd784db925a41c
CN=Amazon,OU=Server CA 4A,O=Amazon,C=US	17708dff2b7faec9cb1b5215ebb2421d
	97b0543c936fac9d6e02b92f20e5c707

Notes: Amazon Trust Services assumed operation of Starfield Services Root Certificate Authority - G2 (SFSG2) on June 10, 2015. Starfield Technologies operated SFSG2 prior to June 10, 2015 and was responsible for the key generation for SFSG2.