

REPORT OF THE INDEPENDENT ACCOUNTANT

To the management of Amazon Trust Services, LLC (“ATS”) and Amazon European Sovereign Cloud Trust Services GmbH (“AESCTS”):

Scope

For ATS’ and AESCTS’ Certification Authority (“CA”) operations in Dublin, Ireland, Berlin, Germany, and Washington, Oregon and Virginia, in the United States of America, for its CAs as enumerated in [Attachment B](#), we have examined whether ATS and AESCTS:

- disclosed its S/MIME certificate lifecycle management business practices in the applicable versions of its Certification Practice Statement (“CPS”), Amazon Trust Services Certificate Policy (“CP”) and Amazon Trust Services Certificate Policy/Certification Practice Statement (“CP/CPS”) enumerated in [Attachment A](#), including its commitment to provide S/MIME certificates in conformity with the CA/Browser Forum Requirements on the ATS and AESCTS [repository](#), and provided such services in accordance with its disclosed practices
- maintained effective controls to provide reasonable assurance that:
 - the integrity of keys and S/MIME certificates it manages is established and protected throughout their lifecycles; and
 - S/MIME 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;
 - 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

throughout the period January 16, 2025 to January 15, 2026, based on the [WebTrust Principles and Criteria for Certification Authorities - S/MIME Certificates v1.0.3](#).

The CA/Browser Forum Baseline Requirements for the Issuance and Management of Publicly-Trusted S/MIME Certificates requires compliance with the Network and Certificate System Security Requirements (“Network Security Requirements”) as set forth by the CA/Browser Forum. The relevant principle and criteria are included as part of WebTrust Principles and Criteria for Certification Authorities - Network Security, which are reported on under separate cover.

Certification Authority’s Responsibilities

ATS’ and AESCTS’ management is responsible for these disclosures and for maintaining effective controls based on the [WebTrust Principles and Criteria for Certification Authorities - S/MIME Certificates v1.0.3](#).



Independent Accountant's Responsibilities

Our responsibility is to express an opinion, based on our examination, about whether, for its CAs as enumerated in [Attachment B](#), in all material respects, ATS and AESCTS have:

- disclosed its S/MIME certificate lifecycle management business practices in the applicable versions of its Amazon Trust Services Certification Practice Statement ("CPS"), Amazon Trust Services Certificate Policy ("CP") and Amazon Trust Services Certificate Policy/Certification Practice Statement ("CP/CPS") enumerated in [Attachment A](#), including its commitment to provide S/MIME certificates in conformity with the CA/Browser Forum Requirements on the ATS and AESCTS [repository](#), and provided such services in accordance with its disclosed practices
- maintained effective controls to provide reasonable assurance that:
 - the integrity of keys and S/MIME certificates it manages is established and protected throughout their lifecycles; and
 - S/MIME 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;
 - 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

throughout the period January 16, 2025 to January 15, 2026, based on the [WebTrust Principles and Criteria for Certification Authorities - S/MIME Certificates v1.0.3](#).

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 the disclosures and controls listed above. An examination involves performing procedures to obtain evidence about the disclosures and controls listed above. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of the disclosures and controls listed above, 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.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

The relative effectiveness and significance of specific controls at ATS and AESCTS 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.



Inherent Limitations

There are inherent limitations in the effectiveness of any system of internal control, including the possibility of human error and the circumvention of controls. For example, because of their nature, controls may not prevent, or detect unauthorized access to systems and information, or failure to comply with internal and external policies or requirements. Also, the projection to the future of any conclusions based on our findings is subject to the risk that controls may become ineffective.

Basis for Qualified Opinion

During the examination period, we noted the following observation, which caused a qualification of our opinion:

Impacted WebTrust Trust Principles and Criteria for Certification Authorities - S/MIME Baseline Requirements		Control Deficiency Noted
1.1	The CA discloses on its website: <ul style="list-style-type: none">• S/MIME Certificate practices, policies and procedures;• Cross Certificates that identify the CA as the Subject, provided that the CA arranged for or accepted the establishment of the trust relationship (i.e. the Cross Certificate at issue); and• its commitment to conform to the latest version of the S/MIME Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates issued by the CA/Browser Forum.	ATS and AESCTS did not disclose its S/MIME certificate practices, policies, procedures, and its commitment to conform to the latest version of the S/MIME Baseline Requirements on its website or in its CP, CPS or CP/CPS documents.
1.4	The Certificate Authority has controls to provide reasonable assurance that the CA CP and/or CPS that describes how the CA implements the latest version of the S/MIME Baseline Requirements are updated at least every 365 days.	

During the examination period, ATS and AESCTS did not operate any CAs for the purpose of issuing an S/MIME subscriber certificate and no S/MIME subscriber certificates were issued.



Qualified Opinion

In our opinion, except for the matters described in the preceding table, for its CAs as enumerated in [Attachment B](#), ATS and AESCTS has, in all material respects:

- disclosed its S/MIME certificate lifecycle management business practices in the applicable versions of its Certification Practice Statement (“CPS”), Amazon Trust Services Certificate Policy (“CP”) and Amazon Trust Services Certificate Policy/Certification Practice Statement (“CP/CPS”) enumerated in [Attachment A](#), including its commitment to provide S/MIME certificates in conformity with the CA/Browser Forum Requirements on the ATS and AESCTS [repository](#), and provided such services in accordance with its disclosed practices
- maintained effective controls to provide reasonable assurance that:
 - the integrity of keys and S/MIME certificates it manages is established and protected throughout their lifecycles; and
 - S/MIME 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;
 - 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

throughout the period January 16, 2025 to January 15, 2026, based on the [WebTrust Principles and Criteria for Certification Authorities - S/MIME Certificates v1.0.3](#).

This report does not include any representation as to the quality of ATS’ and AESCTS’ services other than its CA operations in Dublin, Ireland, Berlin, Germany, and Washington, Oregon and Virginia, in the United States of America, nor the suitability of any of ATS’ and AESCTS’ services for any customer’s intended purpose.

Other Matters

ATS transferred responsibility for the management and operations of CA services in Europe to AESCTS on October 29, 2025.

BDO USA, P.C.

April 7, 2026



ATTACHMENT A - CERTIFICATION PRACTICE STATEMENT AND CERTIFICATE POLICY VERSIONS AND LOCATIONS IN-SCOPE

Policy Name	Version	Effective Date
Amazon Trust Services Certificate Policy	1.0.14	July 24, 2024

Policy Name	Version	Effective Date
Amazon Trust Services Certification Practices Statement	1.0.15	July 24, 2024

Policy Name	Version	Effective Date
Amazon Trust Services Certificate Policy/Certification Practice Statement	2.2	November 27, 2025
Amazon Trust Services Certificate Policy/Certification Practice Statement	2.1	October 20, 2025
Amazon Trust Services Certificate Policy/Certification Practice Statement	2.0	July 23, 2025

Location Name	Location Type	Location	In-Scope for Physical and Environmental Control Testing
CA Office	Office Space	Washington, USA	No
CA Office	Office Space	Berlin, Germany	No
Offline Key Storage 1	Primary site	Washington, USA	Yes
Offline Key Storage 2	Secondary site	Virginia, USA	Yes
Offline Key Storage 3	Primary site	Dublin, Ireland	Yes
Offline Key Storage 4	Secondary site	Berlin, Germany	Yes
Online CA Hosting 1	Datacenter	Oregon, USA	Yes
Online CA Hosting 2	Datacenter	Berlin, Germany	Yes
MPIC Servers	AWS Data Center 1	Africa (Cape Town)	No
MPIC Servers	AWS Data Center 2	Asia Pacific (Hong Kong)	No
MPIC Servers	AWS Data Center 3	Asia Pacific (Hyderabad)	No
MPIC Servers	AWS Data Center 4	Asia Pacific (Jakarta)	No
MPIC Servers	AWS Data Center 5	Asia Pacific (Japan)	No
MPIC Servers	AWS Data Center 6	Asia Pacific (Melbourne)	No
MPIC Servers	AWS Data Center 7	Asia Pacific (Mumbai)	No
MPIC Servers	AWS Data Center 8	Asia Pacific (Osaka)	No
MPIC Servers	AWS Data Center 9	Asia Pacific (Seoul)	No
MPIC Servers	AWS Data Center 10	Asia Pacific (Singapore)	No
MPIC Servers	AWS Data Center 11	Asia Pacific (Australia)	No
MPIC Servers	AWS Data Center 12	Canada (Central)	No
MPIC Servers	AWS Data Center 13	Canada West (Alberta)	No



MPIC Servers	AWS Data Center 14	Europe (Frankfurt)	No
MPIC Servers	AWS Data Center 15	Europe (Ireland)	No
MPIC Servers	AWS Data Center 16	Europe (Milan)	No
MPIC Servers	AWS Data Center 17	Europe (Paris)	No
MPIC Servers	AWS Data Center 18	Europe (Spain)	No
MPIC Servers	AWS Data Center 19	Europe (Stockholm)	No
MPIC Servers	AWS Data Center 20	Europe (United Kingdom)	No
MPIC Servers	AWS Data Center 21	Europe (Zurich)	No
MPIC Servers	AWS Data Center 22	Israel (Tel Aviv)	No
MPIC Servers	AWS Data Center 23	Middle East (Bahrain)	No
MPIC Servers	AWS Data Center 24	Middle East (UAE)	No
MPIC Servers	AWS Data Center 25	South America (São Paulo)	No
MPIC Servers	AWS Data Center 26	US East (N. Virginia)	No
MPIC Servers	AWS Data Center 27	US East (Ohio)	No
MPIC Servers	AWS Data Center 28	US West (N. California)	No
MPIC Servers	AWS Data Center 29	US West (Oregon)	No



ATTACHMENT B - IN-SCOPE CAs

Root CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN = Amazon Root CA 1 O = Amazon C = US	8ECDE6884F3D87B1125BA31AC3FCB13D7016DE7F57CC904FE1CB97C6AE98196E	FBE3018031F9586BCBF417 27E417B7D1C45C2F47F93B E372A17B96B50757D5A2	5/25/2015	1/16/2038
CN = Amazon Root CA 2 O = Amazon C = US	1BA5B2AA8C65401A82960118F80BEC4F62304D83CEC4713A19C39C011EA46DB4	7F4296FC5B6A4E3B35D3C3 69623E364AB1AF381D8FA7 121533C9D6C633EA2461	5/25/2015	5/25/2040
CN = Amazon Root CA 3 O = Amazon C = US	18CE6CFE7BF14E60B2E347B8DFE868CB31D02EBB3ADA271569F50343B46DB3A4	36ABC32656ACFC645C61B7 1613C4BF21C787F5CABBEE 48348D58597803D7ABC9	5/25/2015	5/25/2040
CN = Amazon Root CA 4 O = Amazon C = US	E35D28419ED02025CFA69038CD623962458DA5C695FBDEA3C22B0BFB25897092	F7ECDE5C66047D28ED64 66B543C40E0743ABE81D10 9254DC8F45D4C2C7853C5	5/25/2015	5/25/2040
CN = Starfield Services Root Certificate Authority - G2 ¹ O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	568D6905A2C88708A4B3025190EDCFEDB1974A606A13C6E5290FCB2AE63EDAB5	2B071C59A0A0AE76B0EAD B2BAD23BAD4580B69C360 1B630C2EAF0613AFA83F92	8/31/2009	12/31/2037
CN = Amazon RSA 2048 Root 2025 S1 O = Amazon C = US	3F16D79CF55236961C9984201C0CB98B8301F03AA5F5EDA47C789DF58ABC15EA	7F4D5C247C68DBA60D189 CD82964307134709FC392C 963BCBEDF518A8580FE04	12/3/2025	11/29/2043
CN = Amazon ECDSA 256 Root 2025 S1 O = Amazon C = US	3D8703F244E34E2C6B63D89698E859F0EFB9D868183008F942D38CD368E7EA96	406562CD2B176CCACAEF9 B47196BCE8C5AA87BB9553 B28FF2EB7DE02BC532C9C	12/3/2025	11/29/2043
CN = Amazon ECDSA 384 Root 2025 S1 O = Amazon C = US	2F0E7830EC63768BA1DA6D3E6524F346B5CFADC6EDF5A9165885EB11BA2D3665	26000A9CDDE7235998000A 020930D8A499C6343DBED CC445421B22CB6AF2B603	12/3/2025	11/29/2043

Cross-Signed CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN = Amazon Root CA 1 O = Amazon C = US	87DCD4DC74640A322CD205552506D1BE64F12596258096544986B4850BC72706	FBE3018031F9586BCBF417 27E417B7D1C45C2F47F93B E372A17B96B50757D5A2	5/25/2015	12/31/2037

¹ ATS assumed operation of this Root CA on June 10, 2015. Starfield Technologies operated this CA prior to June 10, 2015 and was responsible for its key generation.



Cross-Signed CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
	391220705B75BCF3ED3CD4B3631213F569D2CF8226101E170799A5354AB12861		10/21/2015	12/31/2037
CN = Amazon Root CA 2 O = Amazon C = US	8B358466D66126312120645A5875A6A57E3C81D98476A967604244254EAC00F0	7F4296FC5B6A4E3B35D3C3 69623E364AB1AF381D8FA7 121533C9D6C633EA2461	5/25/2015	12/31/2037
CN = Amazon Root CA 3 O = Amazon C = US	40C826FDB22BA32A2F9DB4F94770F72B8B1DA9C8FFDA7B11E6F27AF245C89B5E	36ABC32656ACFC645C61B7 1613C4BF21C787F5CABBEE 48348D58597803D7ABC9	5/25/2015	12/31/2037
CN = Amazon Root CA 4 O = Amazon C = US	543D9B7FC2A6471CD84FCA52C2CF6159DF83EBFCD88D8B08B5AF3F88737F52E6	F7ECDEDE5C66047D28ED64 66B543C40E0743ABE81D10 9254DCF845D4C2C7853C5	5/25/2015	12/31/2037

Intermediate CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN=Amazon RSA 2048 M05 O=Amazon C=US	F1D0D91BD33F9C0600B394481847FCD3069D4532FE55EFC06A12E5259DD4CE2A	3DD9C9093547E6322BB3BD ABFE67D5A929A6FDE215FE 7AE5C528A4797663BC8F	1/13/2025	1/15/2033
CN=Amazon RSA 2048 M06 O=Amazon C=US	64F0C9594F65BD69FCF82E35879827F3AEB36B9F997726A9A9F33CB61EE7BBB	1822A8DD53E117B25D340A 18602BC2D4E6B88B0227CE DA9933BA15DCDAB889B2	1/13/2025	1/15/2033
CN=Amazon RSA 4096 M05 O=Amazon C=US	8714CD260F39B865E4B0ADF16ECBAA748AB0ABE494980E80E196A6DB1B170B5B	69262417C64D056E5EF539 5F7BC65BD7C6D7C3122F5F 1F40E7A6CAF9980ECE8D	1/13/2025	1/15/2033
CN=Amazon ECDSA 256 M05 O=Amazon C=US	36A77659CA91702BC800B527D12A6B4FD0237D506EDBE4670FD3A56CD0AE4243	39F2551D1B91B392031FEB 7822E9587093E76640B46C F2CC546E8ACC96D62CBA	1/13/2025	1/15/2033
CN=Amazon ECDSA 256 M06 O=Amazon C=US	4FF1CF3F6920EEC8D5078ABBA246F198588987DC543B73CD12ABC781125CA0FE	26DC4A8860CAE0ED7D4D7 3C32B6D834AC3A74A9C13 FBBBFCB690EB59168B9429	1/13/2025	1/15/2033
CN=Amazon ECDSA 384 M05 O=Amazon C=US	36FDD1CDE845411BACF3C09E1CA09546DDC5DEA40332DE411AE56EEA349BAEBE	D4355548E497AB4C247A09 75FC6F6A22CC65C88D5346 7D0A000FA5BFC95F3B2D	1/13/2025	1/15/2033
CN=Amazon ECDSA 384 M06 O=Amazon C=US	4F2D3225BA9E26817DFA325A4FB3397FDE34DE62C41D846CE05D815A10276C3B	85DE0208B443F9F869ECA5 8C48FE7E45F1D5494FEC6B 7EE369C7736DD5B04BEB	1/13/2025	1/15/2033



Intermediate CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN=Amazon RSA 2048 S00 O=Amazon C=US	B687B4900748F3D9890FE7BA81F035BDC07CCA578A47790DE8BFC02915124857	E8ADBA38821F4E64A8D01C8F307E9A382487013B9E62B03926AEF6C7F5A2D140	5/28/2025	5/28/2033
CN=Amazon RSA 2048 S01 O=Amazon C=US	62BBC1627CAB36CB87DEC27C74276D4E742C7ED513192950DA8244C9BC8EE58A	45EE712CE06E202487044F0C7A26EECB441A20B55D862CB946853F58A97405B4	5/28/2025	5/28/2033
CN=Amazon RSA 2048 S02 O=Amazon C=US	C1951C4DED63B526FDCAC5AA28FCD9073CB8E00B57E18DE536F1CACA532A1B3A	F21831D6A9CB809292531613D3C6DFA72243D9F08C8F52243FFA74EB2B9C7DBB	5/28/2025	5/28/2033
CN=Amazon RSA 2048 S03 O=Amazon C=US	63FA7725C0A65F03802A196175C3D793A313D9B3917CDBBBD4E54898F154D38E	F18DB0FE82E282DF9BC3C80AC10394533A8BC267ACD13D4CB10ABBEDDBB60BD6	5/28/2025	5/28/2033
CN=Amazon RSA 2048 S04 O=Amazon C=US	94930D569EEAE4264CF70F69BD7FCD0FCFA5F1A76AD87AD1DBDBEE984E9321E6	67816844432145AFCB9521C6D617450EB0B519FC059A5A45F808054F73C88DAD	5/28/2025	5/28/2033
CN=Amazon RSA 2048 S05 O=Amazon C=US	311554AFD476DEDEA5CAA0D6917F2B05EB12994EE8AD1617B4DAF98ED4CD57AE	43F19FC57567513C0E410F7BDA2B2DE37886AE751D316C363B7A04906403AD58	5/28/2025	5/28/2033
CN=Amazon ECDSA 256 S00 O=Amazon C=US	6E80F9F44C2A983F16DD6A8F0AEFCA46F95586A7210DD3B77ED859FC9DB160CC	FF2CB8895987F63E8B6938BE06C09A1DDA2D0F3C99E79F11D29FEF59A778AFC0	5/28/2025	5/28/2033
CN=Amazon ECDSA 256 S01 O=Amazon C=US	912D7ED2F86EAF8196C85298FE67673352B047B7394AE51C3FED20D2EEB612F4	2DD4665A1ED7CB2A42E947531FA6D2A11615BBF875843A5F8BB69367C9214723	5/28/2025	5/28/2033
CN=Amazon ECDSA 256 S02 O=Amazon C=US	F8D07375A319FF5FB7F7EB9F2B1DEF77D10BF33EFA29A9A64563958A51A11687	BF8353A02BB35C6A25BEE9FF23243D5FC63E759FC32EED8C567216BC19A41904	5/28/2025	5/28/2033
CN=Amazon ECDSA 256 S03 O=Amazon C=US	0F4E9E2C6597A7EBC2C8A9057CD0EE0E3B8D2E0E7582D442E223D520BED9F6EB	236C5BC8B3C62CE31E8CA8045326CD38AF8BFE79231B95DFFC8352DD2C6AA0F3	5/28/2025	5/28/2033
CN=Amazon ECDSA 256 S04 O=Amazon C=US	AF381D37CC376F46EAC13FF7CEDF1BB890F87E5A07754B1B0617B9D8C3BF6D79	E8D133628264F8BA466001935B008B11D687F794AD8B27ED621CD0A81913C1F6	5/28/2025	5/28/2033



Intermediate CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN=Amazon ECDSA 256 S05 O=Amazon C=US	8BB5B3DED8B69610A54149B238A168FC6D77A2BCDB7CEF14E3158D787B039D6A	F0F5A7FB266AD1077FB631 8A77D7F0B825AC531E451A F0033B73FAC6C349BC20	5/28/2025	5/28/2033
CN=Amazon ECDSA 384 S00 O=Amazon C=US	93EC4E9F741860919274887DE4883FA45646CDA8E4F2D81210FA432BB73ACE8E	D593C63CB249989EAF8B0A 216452024C800C5934F664 7AB18CAF784EB4C49704	5/28/2025	5/28/2033
CN=Amazon ECDSA 384 S01 O=Amazon C=US	8D35A11CA3AF4E072045779287D630C4F6D9F27183F7C3A42937181B41A5BF3B	E650E2E91EE664D3BE646D A173C8851393350AA3042D 8C2E3A4EA65389FEBFCF	5/28/2025	5/28/2033
CN=Amazon ECDSA 384 S02 O=Amazon C=US	C0327B482184F0C4205DF9297525AAD2A9F0EFF6BDA7DDF66045BAFDEFD4130E	3A08EBF4F5472AF210A080 C59F8513AE887B8E10FA52 61376D92E8D1BDBEC228	5/28/2025	5/28/2033
CN=Amazon ECDSA 384 S03 O=Amazon C=US	835C93CDA003A8A86C3F4B6BE94950F77545EED8D530EB6DC99140C5149E7FDD	6DAD74032D6CB6D8C69D7 1A50624356432DC22E825B 9338C9E8AABEC8685FECB	5/28/2025	5/28/2033
CN=Amazon ECDSA 384 S04 O=Amazon C=US	28580C4094EF43998D367AAD6D7A71AD3D93DB4C8A4CE21B3FB992AE9EA7F8F3	80FF251CE9D865ED449876 B85C043CDB78F9E7CE02A8 1E9EE4A7C9BC88228E05	5/28/2025	5/28/2033
CN=Amazon ECDSA 384 S05 O=Amazon C=US	684560D8149E60A28EF6A9EB08774FAD0EA49285D278E34AEDEEF291F8DC8F85	C1BA8381552D1C35CE359F 7E1C21D761E95E944628F7 C237235D1A46AFBEB5BA	5/28/2025	5/28/2033



CAs TRANSFERRED TO AESCTS ON OCTOBER 29, 2025

Root CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN = Amazon RSA 2048 Root EU M1 O = Amazon C = DE	EAFFAC50C7E3E15A68F779A5E70EC2F5E9FC4A03FF69AB337B4D6C4510432395	8D935558E6A3C896330148 FFDF6A1AC0A5BFBA1AB44 545135A3B376C9A1A308D	11/14/2024	11/14/2042
CN = Amazon ECDSA 256 Root EU M1 O = Amazon C = DE	9EAD32C9285FE68BA2C5B0FE427D149B103FDFA1D0958D77C3DA0FF246E853D3	9565907725464BE0BFF44B 1232F85EE862A9A0D99DB9 71BA20344AAF41431D58	11/14/2024	11/14/2042
CN = Amazon ECDSA 384 Root EU M1 O = Amazon C = DE	8E136CE0E77C848F2D2910ABD4E3A764358BB1B7A4932202BC9B915732462D85	798FE10957E8C5A0874201 CAF09D5EF4B2E2412C47BF 991949566CB542D3AF3F	11/14/2024	11/14/2042

Cross-Signed CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN = Amazon RSA 2048 Root EU M1 O = Amazon C = DE	BDDB011E995A62B9F58507944E04F8A624888EF4C0C41C79CAB032168C86B83B	8D935558E6A3C896330148 FFDF6A1AC0A5BFBA1AB44 545135A3B376C9A1A308D	9/17/2025	9/15/2033
CN = Amazon ECDSA 256 Root EU M1 O = Amazon C = DE	F35A8A529EE51C24078D36A00B918C5080AEDCA0611E5BE55831B4CB66F2C2F5	9565907725464BE0BFF44B 1232F85EE862A9A0D99DB9 71BA20344AAF41431D58	9/17/2025	9/15/2033
CN = Amazon ECDSA 384 Root EU M1 O = Amazon C = DE	C5DF074E1C3A2EAEC742930BEDA6C1A429DB293F96A8F1DB3B1436D772B7C483	798FE10957E8C5A0874201 CAF09D5EF4B2E2412C47BF 991949566CB542D3AF3F	9/17/2025	9/15/2033

Intermediate CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN=Amazon RSA 2048 EU S00 O=Amazon C=DE	2CE3BE72BBF56EDB17095B603ED4D8280B081B38204341546802C1427BB2435F	096C09184878380F0844CC 60D8ADD9B7FA8CF6C27CD 138EC03D07B60CA6FBAD5	10/1/2025	9/29/2033
CN=Amazon RSA 2048 EU S01 O=Amazon C=DE	AD74711E36B04D405884502784E431B370056886F38E4B4CBC80DC3A70520E66	78DCC0CD6B7D39FD9A9A0 0A5BF836D07F622DB71F80 685483749762E41F60B71	10/1/2025	9/29/2033



Intermediate CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN=Amazon RSA 2048 EU S02 O=Amazon C=DE	D784A432804C2D537B9A826BB780A6362A9E02BBCBE2DDB8CFA011A0B70B3C37	4F7CB054ED5269CA01D870E46E43B510BCCF30FB0477ED929138611B775206AA	10/1/2025	9/29/2033
CN=Amazon ECDSA 256 EU S00 O=Amazon C=DE	BC38993AA14B49931877623D95E9394F6C1AE2D32DC5FEC2E8B7259FED99CD24	DB472CBD563283993A34E0BDBFC8E0221437750DBCE95AD89F67D807550590A3	10/1/2025	9/29/2033
CN=Amazon ECDSA 256 EU S01 O=Amazon C=DE	A9C3227FB1CBB1759938EF8718FDF835C0F8B6A546928BB0B4782A570CED4E5	93E3B4856211F193EBBBD0D49B93DDDEA9EC1220A12AD9F1BF3D2B0A256BBDA	10/1/2025	9/29/2033
CN=Amazon ECDSA 256 EU S02 O=Amazon C=DE	EF79C8327BEB51E7B3B4DBCDEF239FCE367B1E09D35A78407000A0270BC232E	0CE0D894EC3562023C6CF727B97148F62F50311C55A2C4963396A27120D522DB	10/1/2025	9/29/2033
CN=Amazon ECDSA 384 EU S00 O=Amazon C=DE	A91AA45C79B99F3ABA79CC677D2BDD4623B54A3D035B37681109D7E38BA02E6C	0839542A639EFD5273FB11C0583E2B4F2C662724E4E8EBFA2DA1286CFF868127	10/1/2025	9/29/2033
CN=Amazon ECDSA 384 EU S01 O=Amazon C=DE	9A471687404FB5C3AAA5B218047A3255A41997C85B6AA8009F4C3DBEFE7A9299	764A931C8D29AEA402511E04FE54E23CAF22DB4D852954C9180CBA39DA101F7F	10/1/2025	9/29/2033
CN=Amazon ECDSA 384 EU S02 O=Amazon C=DE	46D1B2F46F959410BD0201702CB33077A9C34F5CB23F976CDD8D328989B04B27	AC816DBEC0D572A695D3529E64B8807B886E40D78DD61820403C258A542396529	10/1/2025	9/29/2033



April 7, 2026

AMAZON TRUST SERVICES, LLC MANAGEMENT'S ASSERTION

Amazon Trust Services, LLC ("ATS") operates the Certification Authority ("CA") services for the CAs enumerated in [Attachment B](#) in scope for S/MIME Baseline Requirements and provides S/MIME CA services.

The management of ATS is responsible for establishing and maintaining effective controls over its S/MIME CA operations, including its S/MIME CA business practices disclosure on its [repository](#), S/MIME key lifecycle management controls, and S/MIME 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's 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 S/MIME CA services. During our assessment, we noted the following observation, which caused the relevant criteria to not be met:

Impacted WebTrust Trust Principles and Criteria for Certification Authorities - S/MIME Baseline Requirements		Control Deficiency Noted
1.1	The CA discloses on its website: <ul style="list-style-type: none">• S/MIME Certificate practices, policies and procedures;• Cross Certificates that identify the CA as the Subject, provided that the CA arranged for or accepted the establishment of the trust relationship (i.e. the Cross Certificate at issue); and• its commitment to conform to the latest version of the S/MIME Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates issued by the CA/Browser Forum.	ATS does not disclose its S/MIME certificate practices, policies, procedures, and its commitment to conform to the latest version of the S/MIME Baseline Requirements on its website or in its CP, CPS or CP/CPS documents.
1.4	The Certificate Authority has controls to provide reasonable assurance that the CA CP and/or CPS that describes how the CA implements the latest version of the S/MIME Baseline Requirements are updated at least every 365 days.	

Based on that assessment, in ATS management's opinion, except for the matter described in the preceding table, in providing its S/MIME CA services in Dublin, Ireland, Berlin, Germany, and Washington, Oregon and Virginia, in the United States of America, for its CAs as enumerated in [Attachment B](#), ATS has:

- disclosed its S/MIME certificate lifecycle management business practices in the applicable versions of its Amazon Trust Services Certification Practice Statement (“CPS”), Amazon Trust Services Certificate Policy (“CP”) and Amazon Trust Services Certificate Policy/Certification Practice Statement (“CP/CPS”) enumerated in [Attachment A](#), including its commitment to provide S/MIME certificates in conformity with the CA/Browser Forum Requirements on the ATS [repository](#), and provided such services in accordance with its disclosed practices
- maintained effective controls to provide reasonable assurance that:
 - the integrity of keys and S/MIME certificates it manages is established and protected throughout their lifecycles; and
 - S/MIME 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;
 - 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

throughout the period January 16, 2025 to January 15, 2026, based on the [WebTrust Principles and Criteria for Certification Authorities - S/MIME Certificates v1.0.3](#).

ATS transferred responsibility for the management and operations of CA services in Europe to Amazon European Sovereign Cloud Trust Services GmbH (“AESCTS”) on October 29, 2025. The CAs that were transferred are enumerated in [Attachment B](#).

During the examination period, ATS did not operate any CAs for the purpose of issuing an S/MIME subscriber certificate and no S/MIME subscriber certificates were issued.

Kranthi Darapu

Kranthi Darapu
Vice President
Amazon Trust Services, LLC

ATTACHMENT A - CERTIFICATION PRACTICE STATEMENT AND CERTIFICATE POLICY VERSIONS AND LOCATIONS IN-SCOPE

Policy Name	Version	Effective Date
Amazon Trust Services Certificate Policy	1.0.14	July 24, 2024

Policy Name	Version	Effective Date
Amazon Trust Services Certification Practices Statement	1.0.15	July 24, 2024

Policy Name	Version	Effective Date
Amazon Trust Services Certificate Policy/Certification Practice Statement	2.2	November 27, 2025
Amazon Trust Services Certificate Policy/Certification Practice Statement	2.1	October 20, 2025
Amazon Trust Services Certificate Policy/Certification Practice Statement	2.0	July 23, 2025

Location Name	Location Type	Location	In-Scope for Physical and Environmental Control Testing
CA Office	Office Space	Washington, USA	No
CA Office	Office Space	Berlin, Germany	No
Offline Key Storage 1	Primary site	Washington, USA	Yes
Offline Key Storage 2	Secondary site	Virginia, USA	Yes
Offline Key Storage 3	Primary site	Dublin, Ireland	Yes
Offline Key Storage 4	Secondary site	Berlin, Germany	Yes
Online CA Hosting 1	Datacenter	Oregon, USA	Yes
Online CA Hosting 2	Datacenter	Berlin, Germany	Yes
MPIC Servers	AWS Data Center 1	Africa (Cape Town)	No
MPIC Servers	AWS Data Center 2	Asia Pacific (Hong Kong)	No
MPIC Servers	AWS Data Center 3	Asia Pacific (Hyderabad)	No
MPIC Servers	AWS Data Center 4	Asia Pacific (Jakarta)	No
MPIC Servers	AWS Data Center 5	Asia Pacific (Japan)	No
MPIC Servers	AWS Data Center 6	Asia Pacific (Melbourne)	No
MPIC Servers	AWS Data Center 7	Asia Pacific (Mumbai)	No
MPIC Servers	AWS Data Center 8	Asia Pacific (Osaka)	No
MPIC Servers	AWS Data Center 9	Asia Pacific (Seoul)	No
MPIC Servers	AWS Data Center 10	Asia Pacific (Singapore)	No
MPIC Servers	AWS Data Center 11	Asia Pacific (Australia)	No
MPIC Servers	AWS Data Center 12	Canada (Central)	No

MPIC Servers	AWS Data Center 13	Canada West (Alberta)	No
MPIC Servers	AWS Data Center 14	Europe (Frankfurt)	No
MPIC Servers	AWS Data Center 15	Europe (Ireland)	No
MPIC Servers	AWS Data Center 16	Europe (Milan)	No
MPIC Servers	AWS Data Center 17	Europe (Paris)	No
MPIC Servers	AWS Data Center 18	Europe (Spain)	No
MPIC Servers	AWS Data Center 19	Europe (Stockholm)	No
MPIC Servers	AWS Data Center 20	Europe (United Kingdom)	No
MPIC Servers	AWS Data Center 21	Europe (Zurich)	No
MPIC Servers	AWS Data Center 22	Israel (Tel Aviv)	No
MPIC Servers	AWS Data Center 23	Middle East (Bahrain)	No
MPIC Servers	AWS Data Center 24	Middle East (UAE)	No
MPIC Servers	AWS Data Center 25	South America (São Paulo)	No
MPIC Servers	AWS Data Center 26	US East (N. Virginia)	No
MPIC Servers	AWS Data Center 27	US East (Ohio)	No
MPIC Servers	AWS Data Center 28	US West (N. California)	No
MPIC Servers	AWS Data Center 29	US West (Oregon)	No

ATTACHMENT B - IN-SCOPE CAs

Root CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN = Amazon Root CA 1 O = Amazon C = US	8ECDE6884F3D87B1125BA31AC3FCB13D7016DE7F57CC904FE1CB97C6AE98196E	FBE3018031F9586BCBF417 27E417B7D1C45C2F47F93B E372A17B96B50757D5A2	5/25/2015	1/16/2038
CN = Amazon Root CA 2 O = Amazon C = US	1BA5B2AA8C65401A82960118F80BEC4F62304D83CEC4713A19C39C011EA46DB4	7F4296FC5B6A4E3B35D3C3 69623E364AB1AF381D8FA7 121533C9D6C633EA2461	5/25/2015	5/25/2040
CN = Amazon Root CA 3 O = Amazon C = US	18CE6CFE7BF14E60B2E347B8DFE868CB31D02EBB3ADA271569F50343B46DB3A4	36ABC32656ACFC645C61B7 1613C4BF21C787F5CABBEE 48348D58597803D7ABC9	5/25/2015	5/25/2040
CN = Amazon Root CA 4 O = Amazon C = US	E35D28419ED02025CFA69038CD623962458DA5C695FBDEA3C22B0BFB25897092	F7ECDE5C66047D28ED64 66B543C40E0743ABE81D10 9254DC845D4C2C7853C5	5/25/2015	5/25/2040
CN = Starfield Services Root Certificate Authority - G2 ¹ O = Starfield Technologies, Inc. L = Scottsdale S = Arizona C = US	568D6905A2C88708A4B3025190EDCFEDB1974A606A13C6E5290FCB2AE63EDAB5	2B071C59A0A0AE76B0EAD B2BAD23BAD4580B69C360 1B630C2EAF0613AFA83F92	8/31/2009	12/31/2037
CN = Amazon RSA 2048 Root 2025 S1 O = Amazon C = US	3F16D79CF55236961C9984201C0CB98B8301F03AA5F5EDA47C789DF58ABC15EA	7F4D5C247C68DBA60D189 CD82964307134709FC392C 963BCBEDF518A8580FE04	12/3/2025	11/29/2043
CN = Amazon ECDSA 256 Root 2025 S1 O = Amazon C = US	3D8703F244E34E2C6B63D89698E859F0EFB9D868183008F942D38CD368E7EA96	406562CD2B176CCACAEF9 B47196BCE8C5AA87BB9553 B28FF2EB7DE02BC532C9C	12/3/2025	11/29/2043
CN = Amazon ECDSA 384 Root 2025 S1 O = Amazon C = US	2F0E7830EC63768BA1DA6D3E6524F346B5CFADC6EDF5A9165885EB11BA2D3665	26000A9CDDE7235998000A 020930D8A499C6343DBED CC445421B22CB6AF2B603	12/3/2025	11/29/2043

¹ ATS assumed operation of this Root CA on June 10, 2015. Starfield Technologies operated this CA prior to June 10, 2015 and was responsible for its key generation.

Cross-Signed CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN = Amazon Root CA 1 O = Amazon C = US	87DCD4DC74640A322CD205552506D1BE64F12596258096544986B4850BC72706	FBE3018031F9586BCBF417 27E417B7D1C45C2F47F93B E372A17B96B50757D5A2	5/25/2015	12/31/2037
	391220705B75BCF3ED3CD4B3631213F569D2CF8226101E170799A5354AB12861		10/21/2015	12/31/2037
CN = Amazon Root CA 2 O = Amazon C = US	8B358466D66126312120645A5875A6A57E3C81D98476A967604244254EAC00F0	7F4296FC5B6A4E3B35D3C3 69623E364AB1AF381D8FA7 121533C9D6C633EA2461	5/25/2015	12/31/2037
CN = Amazon Root CA 3 O = Amazon C = US	40C826FDB22BA32A2F9DB4F94770F72B8B1DA9C8FFDA7B11E6F27AF245C89B5E	36ABC32656ACFC645C61B7 1613C4BF21C787F5CABBEE 48348D58597803D7ABC9	5/25/2015	12/31/2037
CN = Amazon Root CA 4 O = Amazon C = US	543D9B7FC2A6471CD84FCA52C2CF6159DF83EBFCD88D8B08B5AF3F88737F52E6	F7ECDEED5C66047D28ED64 66B543C40E0743ABE81D10 9254DCF845D4C2C7853C5	5/25/2015	12/31/2037

Intermediate CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN=Amazon RSA 2048 M05 O=Amazon C=US	F1D0D91BD33F9C0600B394481847FCD3069D4532FE55EFC06A12E5259DD4CE2A	3DD9C9093547E6322BB3BD ABFE67D5A929A6FDE215FE 7AE5C528A4797663BC8F	1/13/2025	1/15/2033
CN=Amazon RSA 2048 M06 O=Amazon C=US	64F0C9594F65BD69FCF82E35879827F3AEB36B9F9977726A9A9F33CB61EE7BBB	1822A8DD53E117B25D340A 18602BC2D4E6B88B0227CE DA9933BA15DCDAB889B2	1/13/2025	1/15/2033
CN=Amazon RSA 4096 M05 O=Amazon C=US	8714CD260F39B865E4B0ADF16ECBAA748AB0ABE494980E80E196A6DB1B170B5B	69262417C64D056E5EF539 5F7BC65BD7C6D7C3122F5F 1F40E7A6CAF9980ECE8D	1/13/2025	1/15/2033
CN=Amazon ECDSA 256 M05 O=Amazon C=US	36A77659CA91702BC800B527D12A6B4FD0237D506EDBE4670FD3A56CD0AE4243	39F2551D1B91B392031FEB 7822E9587093E76640B46C F2CC546E8ACC96D62CBA	1/13/2025	1/15/2033
CN=Amazon ECDSA 256 M06 O=Amazon C=US	4FF1CF3F6920EEC8D5078ABBA246F198588987DC543B73CD12ABC781125CA0FE	26DC4A8860CAE0ED7D4D7 3C32B6D834AC3A74A9C13 FBBBFCB690EB59168B9429	1/13/2025	1/15/2033

Intermediate CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN=Amazon ECDSA 384 M05 O=Amazon C=US	36FDD1CDE845411BACF3C09E1CA09546DDC5DEA40332DE411AE56EEA349BAEBE	D4355548E497AB4C247A0975FC6F6A22CC65C88D53467D0A000FA5BFC95F3B2D	1/13/2025	1/15/2033
CN=Amazon ECDSA 384 M06 O=Amazon C=US	4F2D3225BA9E26817DFA325A4FB3397FDE34DE62C41D846CE05D815A10276C3B	85DE0208B443F9F869ECA58C48FE7E45F1D5494FEC6B7EE369C7736DD5B04BEB	1/13/2025	1/15/2033
CN=Amazon RSA 2048 S00 O=Amazon C=US	B687B4900748F3D9890FE7BA81F035BDC07CCA578A47790DE8BFC02915124857	E8ADBA38821F4E64A8D01C8F307E9A382487013B9E62B03926AEF6C7F5A2D140	5/28/2025	5/28/2033
CN=Amazon RSA 2048 S01 O=Amazon C=US	62BBC1627CAB36CB87DEC27C74276D4E742C7ED513192950DA8244C9BC8EE58A	45EE712CE06E202487044F0C7A26EECB441A20B55D862CB946853F58A97405B4	5/28/2025	5/28/2033
CN=Amazon RSA 2048 S02 O=Amazon C=US	C1951C4DED63B526FDCAC5AA28FCD9073CB8E00B57E18DE536F1CACA532A1B3A	F21831D6A9CB809292531613D3C6DFA72243D9F08C8F52243FFA74EB2B9C7DBB	5/28/2025	5/28/2033
CN=Amazon RSA 2048 S03 O=Amazon C=US	63FA7725C0A65F03802A196175C3D793A313D9B3917CDBBBD4E54898F154D38E	F18DB0FE82E282DF9BC3C80AC10394533A8BC267ACD13D4CB10ABBEDDBB60BD6	5/28/2025	5/28/2033
CN=Amazon RSA 2048 S04 O=Amazon C=US	94930D569EEAE4264CF70F69BD7FCD0FCFA5F1A76AD87AD1DBDBEE984E9321E6	67816844432145AFCB9521C6D617450EB0B519FC059A5A45F808054F73C88DAD	5/28/2025	5/28/2033
CN=Amazon RSA 2048 S05 O=Amazon C=US	311554AFD476DEDEA5CAA0D6917F2B05EB12994EE8AD1617B4DAF98ED4CD57AE	43F19FC57567513C0E410F7BDA2B2DE37886AE751D316C363B7A04906403AD58	5/28/2025	5/28/2033
CN=Amazon ECDSA 256 S00 O=Amazon C=US	6E80F9F44C2A983F16DD6A8F0AEFCA46F95586A7210DD3B77ED859FC9DB160CC	FF2CB8895987F63E8B6938BE06C09A1DDA2D0F3C99E79F11D29FEF59A778AFC0	5/28/2025	5/28/2033
CN=Amazon ECDSA 256 S01 O=Amazon C=US	912D7ED2F86EAF8196C85298FE67673352B047B7394AE51C3FED20D2EEB612F4	2DD4665A1ED7CB2A42E947531FA6D2A11615BBF875843A5F8BB69367C9214723	5/28/2025	5/28/2033

Intermediate CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN=Amazon ECDSA 256 S02 O=Amazon C=US	F8D07375A319FF5FB7F7EB9F2B1DEF77D10BF33EFA29A9A64563958A51A11687	BF8353A02BB35C6A25BEE9 FF23243D5FC63E759FC32E ED8C567216BC19A41904	5/28/2025	5/28/2033
CN=Amazon ECDSA 256 S03 O=Amazon C=US	0F4E9E2C6597A7EBC2C8A9057CD0EE0E3B8D2E0E7582D442E223D520BED9F6EB	236C5BC8B3C62CE31E8CA B045326CD38AF8BFE79231 B95DFFC8352DD2C6AA0F3	5/28/2025	5/28/2033
CN=Amazon ECDSA 256 S04 O=Amazon C=US	AF381D37CC376F46EAC13FF7CEDF1BB890F87E5A07754B1B0617B9D8C3BF6D79	E8D133628264F8BA466001 935B008B11D687F794AD8B 27ED621CD0A81913C1F6	5/28/2025	5/28/2033
CN=Amazon ECDSA 256 S05 O=Amazon C=US	8BB5B3DED8B69610A54149B238A168FC6D77A2BCDB7CEF14E3158D787B039D6A	F0F5A7FB266AD1077FB631 8A77D7F0B825AC531E451A F0033B73FAC6C349BC20	5/28/2025	5/28/2033
CN=Amazon ECDSA 384 S00 O=Amazon C=US	93EC4E9F741860919274887DE4883FA45646CDA8E4F2D81210FA432BB73ACE8E	D593C63CB249989EAF8B0A 216452024C800C5934F664 7AB18CAF784EB4C49704	5/28/2025	5/28/2033
CN=Amazon ECDSA 384 S01 O=Amazon C=US	8D35A11CA3AF4E072045779287D630C4F6D9F27183F7C3A42937181B41A5BF3B	E650E2E91EE664D3BE646D A173C8851393350AA3042D 8C2E3A4EA65389FEBFCF	5/28/2025	5/28/2033
CN=Amazon ECDSA 384 S02 O=Amazon C=US	C0327B482184F0C4205DF9297525AAD2A9F0EFF6BDA7DDF66045BAFDEFD4130E	3A08EBF4F5472AF210A080 C59F8513AE887B8E10FA52 61376D92E8D1BDBEC228	5/28/2025	5/28/2033
CN=Amazon ECDSA 384 S03 O=Amazon C=US	835C93CDA003A8A86C3F4B6BE94950F77545EED8D530EB6DC99140C5149E7FDD	6DAD74032D6CB6D8C69D7 1A50624356432DC22E825B 9338C9E8AABEC8685FECB	5/28/2025	5/28/2033
CN=Amazon ECDSA 384 S04 O=Amazon C=US	28580C4094EF43998D367AAD6D7A71AD3D93DB4C8A4CE21B3FB992AE9EA7F8F3	80FF251CE9D865ED449876 B85C043CDB78F9E7CE02A8 1E9EE4A7C9BC88228E05	5/28/2025	5/28/2033
CN=Amazon ECDSA 384 S05 O=Amazon C=US	684560D8149E60A28EF6A9EB08774FAD0EA49285D278E34AEDEEF291F8DC8F85	C1BA8381552D1C35CE359F 7E1C21D761E95E944628F7 C237235D1A46AFBEB5BA	5/28/2025	5/28/2033

CAs TRANSFERRED TO AESCTS ON OCTOBER 29, 2025

Root CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN = Amazon RSA 2048 Root EU M1 O = Amazon C = DE	EAFAC50C7E3E15A68F779A5E70EC2F5E9FC4A03FF69AB337B4D6C4510432395	8D935558E6A3C896330148 FFDF6A1AC0A5BFBA1AB44 545135A3B376C9A1A308D	11/14/2024	11/14/2042
CN = Amazon ECDSA 256 Root EU M1 O = Amazon C = DE	9EAD32C9285FE68BA2C5B0FE427D149B103FDFA1D0958D77C3DA0FF246E853D3	9565907725464BE0BFF44B 1232F85EE862A9A0D99DB9 71BA20344AAF41431D58	11/14/2024	11/14/2042
CN = Amazon ECDSA 384 Root EU M1 O = Amazon C = DE	8E136CE0E77C848F2D2910ABD4E3A764358BB1B7A4932202BC9B915732462D85	798FE10957E8C5A0874201 CAF09D5EF4B2E2412C47BF 991949566CB542D3AF3F	11/14/2024	11/14/2042

Cross-Signed CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN = Amazon RSA 2048 Root EU M1 O = Amazon C = DE	BDDB011E995A62B9F58507944E04F8A624888EF4C0C41C79CAB032168C86B83B	8D935558E6A3C896330148 FFDF6A1AC0A5BFBA1AB44 545135A3B376C9A1A308D	9/17/2025	9/15/2033
CN = Amazon ECDSA 256 Root EU M1 O = Amazon C = DE	F35A8A529EE51C24078D36A00B918C5080AEDCA0611E5BE55831B4CB66F2C2F5	9565907725464BE0BFF44B 1232F85EE862A9A0D99DB9 71BA20344AAF41431D58	9/17/2025	9/15/2033
CN = Amazon ECDSA 384 Root EU M1 O = Amazon C = DE	C5DF074E1C3A2EAEC742930BEDA6C1A429DB293F96A8F1DB3B1436D772B7C483	798FE10957E8C5A0874201 CAF09D5EF4B2E2412C47BF 991949566CB542D3AF3F	9/17/2025	9/15/2033

Intermediate CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN=Amazon RSA 2048 EU S00 O=Amazon C=DE	2CE3BE72BBF56EDB17095B603ED4D8280B081B38204341546802C1427BB2435F	096C09184878380F0844CC 60D8ADD9B7FA8CF6C27CD 138EC03D07B60CA6FBAD5	10/1/2025	9/29/2033
CN=Amazon RSA 2048 EU S01 O=Amazon C=DE	AD74711E36B04D405884502784E431B370056886F38E4B4CBC80DC3A70520E66	78DCC0CD6B7D39FD9A9A0 0A5BF836D07F622DB71F80 685483749762E41F60B71	10/1/2025	9/29/2033

Intermediate CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN=Amazon RSA 2048 EU S02 O=Amazon C=DE	D784A432804C2D537B9A826BB780A6362A9E02BBCBE2DDB8CFA011A0B70B3C37	4F7CB054ED5269CA01D870E46E43B510BCCF30FB0477ED929138611B775206AA	10/1/2025	9/29/2033
CN=Amazon ECDSA 256 EU S00 O=Amazon C=DE	BC38993AA14B49931877623D95E9394F6C1AE2D32DC5FEC2E8B7259FED99CD24	DB472CBD563283993A34E0BDBFC8E0221437750DBCE95AD89F67D807550590A3	10/1/2025	9/29/2033
CN=Amazon ECDSA 256 EU S01 O=Amazon C=DE	A9C3227FB1CBBD1759938EF8718FDF835C0F8B6A546928BB0B4782A570CED4E5	93E3B4856211F193EBBBD0D49B93DDDEA9EC1220A12AD9F1BF3D2B0A256BBDA	10/1/2025	9/29/2033
CN=Amazon ECDSA 256 EU S02 O=Amazon C=DE	EF79C8327BEB51E7B3B4DBCCDEF239FCE367B1E09D35A78407000A0270BC232E	0CE0D894EC3562023C6CF727B97148F62F50311C55A2C4963396A27120D522DB	10/1/2025	9/29/2033
CN=Amazon ECDSA 384 EU S00 O=Amazon C=DE	A91AA45C79B99F3ABA79CC677D2BDD4623B54A3D035B37681109D7E38BA02E6C	0839542A639EFD5273FB11C0583E2B4F2C662724E4E8EBFA2DA1286CFF868127	10/1/2025	9/29/2033
CN=Amazon ECDSA 384 EU S01 O=Amazon C=DE	9A471687404FB5C3AAA5B218047A3255A41997C85B6AA8009F4C3DBEFE7A9299	764A931C8D29AEA402511E04FE54E23CAF22DB4D852954C9180CBA39DA101F7F	10/1/2025	9/29/2033
CN=Amazon ECDSA 384 EU S02 O=Amazon C=DE	46D1B2F46F959410BD0201702CB33077A9C34F5CB23F976CDD8D328989B04B27	AC816DBEC0D572A695D3529E64B8807B86E40D78DD61820403C258A542396529	10/1/2025	9/29/2033



April 7, 2026

AMAZON EUROPEAN SOVEREIGN CLOUD TRUST SERVICES GMBH MANAGEMENT’S ASSERTION

Amazon European Sovereign Cloud Trust Services GmbH (“AESCTS”) operates the Certification Authority (“CA”) services for the CAs enumerated in [Attachment B](#) in scope for S/MIME Baseline Requirements and provides S/MIME CA services.

The management of AESCTS is responsible for establishing and maintaining effective controls over its S/MIME CA operations, including its S/MIME CA business practices disclosure on its [repository](#), S/MIME key lifecycle management controls, and S/MIME 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 AESCTS’s Certification Authority operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

AESCTS management has assessed its disclosures of its certificate practices and controls over its S/MIME CA services. During our assessment, we noted the following observation, which caused the relevant criteria to not be met:

Impacted WebTrust Trust Principles and Criteria for Certification Authorities - S/MIME Baseline Requirements		Control Deficiency Noted
1.1	The CA discloses on its website: <ul style="list-style-type: none">• S/MIME Certificate practices, policies and procedures;• Cross Certificates that identify the CA as the Subject, provided that the CA arranged for or accepted the establishment of the trust relationship (i.e. the Cross Certificate at issue); and• its commitment to conform to the latest version of the S/MIME Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates issued by the CA/Browser Forum.	AESCTS does not disclose its S/MIME certificate practices, policies, procedures, and its commitment to conform to the latest version of the S/MIME Baseline Requirements on its website or in its CP/CPS documents.
1.4	The Certificate Authority has controls to provide reasonable assurance that the CA CP and/or CPS that describes how the CA implements the latest version of the S/MIME Baseline Requirements are updated at least every 365 days.	

Based on that assessment, in AESCTS management’s opinion, except for the matter described in the preceding table, in providing its S/MIME CA services in Dublin, Ireland and Berlin, Germany, for its CAs as enumerated in [Attachment B](#), AESCTS has:

- disclosed its S/MIME certificate lifecycle management business practices in the applicable versions of its Amazon Trust Services Certificate Policy/Certification Practice Statement (“CP/CPS”) enumerated in [Attachment A](#), including its commitment to provide S/MIME certificates in conformity with the CA/Browser Forum Requirements on the AESCTS [repository](#), and provided such services in accordance with its disclosed practices
- maintained effective controls to provide reasonable assurance that:
 - the integrity of keys and S/MIME certificates it manages is established and protected throughout their lifecycles; and
 - S/MIME 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;
 - 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

throughout the period October 29, 2025 to January 15, 2026, based on the [WebTrust Principles and Criteria for Certification Authorities - S/MIME Certificates v1.0.3](#).

Amazon Trust Services, LLC (“ATS”) transferred responsibility for the management and operations of CA services in Europe to AESCTS on October 29, 2025. The CAs that were transferred are enumerated in [Attachment B](#).

During the examination period, AESCTS did not operate any CAs for the purpose of issuing an S/MIME subscriber certificate and no S/MIME subscriber certificates were issued.

Istvan Kroh

Istvan Kroh
Geschaeftsfuehrer (Managing Director)
Amazon European Sovereign Cloud Trust Services GmbH

ATTACHMENT A - CERTIFICATION PRACTICE STATEMENT AND CERTIFICATE POLICY VERSIONS AND LOCATIONS IN-SCOPE

Policy Name	Version	Effective Date
Amazon Trust Services Certificate Policy/Certification Practice Statement	2.2	November 27, 2025
Amazon Trust Services Certificate Policy/Certification Practice Statement	2.1	October 20, 2025

Location Name	Location Type	Location	In-Scope for Physical and Environmental Control Testing
CA Office	Office Space	Washington, USA	No
CA Office	Office Space	Berlin, Germany	No
Offline Key Storage 1	Primary site	Washington, USA	Yes
Offline Key Storage 2	Secondary site	Virginia, USA	Yes
Offline Key Storage 3	Primary site	Dublin, Ireland	Yes
Offline Key Storage 4	Secondary site	Berlin, Germany	Yes
Online CA Hosting 1	Datacenter	Oregon, USA	Yes
Online CA Hosting 2	Datacenter	Berlin, Germany	Yes
MPIC Servers	AWS Data Center 1	Africa (Cape Town)	No
MPIC Servers	AWS Data Center 2	Asia Pacific (Hong Kong)	No
MPIC Servers	AWS Data Center 3	Asia Pacific (Hyderabad)	No
MPIC Servers	AWS Data Center 4	Asia Pacific (Jakarta)	No
MPIC Servers	AWS Data Center 5	Asia Pacific (Japan)	No
MPIC Servers	AWS Data Center 6	Asia Pacific (Melbourne)	No
MPIC Servers	AWS Data Center 7	Asia Pacific (Mumbai)	No
MPIC Servers	AWS Data Center 8	Asia Pacific (Osaka)	No
MPIC Servers	AWS Data Center 9	Asia Pacific (Seoul)	No
MPIC Servers	AWS Data Center 10	Asia Pacific (Singapore)	No
MPIC Servers	AWS Data Center 11	Asia Pacific (Australia)	No
MPIC Servers	AWS Data Center 12	Canada (Central)	No
MPIC Servers	AWS Data Center 13	Canada West (Alberta)	No
MPIC Servers	AWS Data Center 14	Europe (Frankfurt)	No
MPIC Servers	AWS Data Center 15	Europe (Ireland)	No
MPIC Servers	AWS Data Center 16	Europe (Milan)	No
MPIC Servers	AWS Data Center 17	Europe (Paris)	No
MPIC Servers	AWS Data Center 18	Europe (Spain)	No
MPIC Servers	AWS Data Center 19	Europe (Stockholm)	No
MPIC Servers	AWS Data Center 20	Europe (United Kingdom)	No
MPIC Servers	AWS Data Center 21	Europe (Zurich)	No

MPIC Servers	AWS Data Center 22	Israel (Tel Aviv)	No
MPIC Servers	AWS Data Center 23	Middle East (Bahrain)	No
MPIC Servers	AWS Data Center 24	Middle East (UAE)	No
MPIC Servers	AWS Data Center 25	South America (São Paulo)	No
MPIC Servers	AWS Data Center 26	US East (N. Virginia)	No
MPIC Servers	AWS Data Center 27	US East (Ohio)	No
MPIC Servers	AWS Data Center 28	US West (N. California)	No
MPIC Servers	AWS Data Center 29	US West (Oregon)	No

ATTACHMENT B - IN-SCOPE CAs

Root CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN = Amazon RSA 2048 Root EU M1 O = Amazon C = DE	EAFAC50C7E3E15A68F779A5E70EC2F5E9FC4A03FF69AB337B4D6C4510432395	8D935558E6A3C896330148 FFDF6A1AC0A5BFBA1AB44 545135A3B376C9A1A308D	11/14/2024	11/14/2042
CN = Amazon ECDSA 256 Root EU M1 O = Amazon C = DE	9EAD32C9285FE68BA2C5B0FE427D149B103FDFA1D0958D77C3DA0FF246E853D3	9565907725464BE0BFF44B 1232F85EE862A9A0D99DB9 71BA20344AAF41431D58	11/14/2024	11/14/2042
CN = Amazon ECDSA 384 Root EU M1 O = Amazon C = DE	8E136CE0E77C848F2D2910ABD4E3A764358BB1B7A4932202BC9B915732462D85	798FE10957E8C5A0874201 CAF09D5EF4B2E2412C47BF 991949566CB542D3AF3F	11/14/2024	11/14/2042

Cross-Signed CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN = Amazon RSA 2048 Root EU M1 O = Amazon C = DE	BDD011E995A62B9F58507944E04F8A624888EF4C0C41C79CAB032168C86B83B	8D935558E6A3C896330148 FFDF6A1AC0A5BFBA1AB44 545135A3B376C9A1A308D	9/17/2025	9/15/2033
CN = Amazon ECDSA 256 Root EU M1 O = Amazon C = DE	F35A8A529EE51C24078D36A00B918C5080AEDCA0611E5BE55831B4CB66F2C2F5	9565907725464BE0BFF44B 1232F85EE862A9A0D99DB9 71BA20344AAF41431D58	9/17/2025	9/15/2033
CN = Amazon ECDSA 384 Root EU M1 O = Amazon C = DE	C5DF074E1C3A2EAEC742930BEDA6C1A429DB293F96A8F1DB3B1436D772B7C483	798FE10957E8C5A0874201 CAF09D5EF4B2E2412C47BF 991949566CB542D3AF3F	9/17/2025	9/15/2033

Intermediate CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN=Amazon RSA 2048 EU S00 O=Amazon C=DE	2CE3BE72BBF56EDB17095B603ED4D8280B081B38204341546802C1427BB2435F	096C09184878380F0844CC 60D8ADD9B7FA8CF6C27CD 138EC03D07B60CA6FBAD5	10/1/2025	9/29/2033
CN=Amazon RSA 2048 EU S01 O=Amazon C=DE	AD74711E36B04D405884502784E431B370056886F38E4B4CBC80DC3A70520E66	78DCC0CD6B7D39FD9A9A0 0A5BF836D07F622DB71F80 685483749762E41F60B71	10/1/2025	9/29/2033

Intermediate CA Certificates				
Subject DN	SHA2 Thumbprint	SPKI SHA256	Valid From	Valid To
CN=Amazon RSA 2048 EU S02 O=Amazon C=DE	D784A432804C2D537B9A826BB780A6362A9E02BBCBE2DDB8CFA011A0B70B3C37	4F7CB054ED5269CA01D870E46E43B510BCCF30FB0477ED929138611B775206AA	10/1/2025	9/29/2033
CN=Amazon ECDSA 256 EU S00 O=Amazon C=DE	BC38993AA14B49931877623D95E9394F6C1AE2D32DC5FEC2E8B7259FED99CD24	DB472CBD563283993A34E0BDBFC8E0221437750DBCE95AD89F67D807550590A3	10/1/2025	9/29/2033
CN=Amazon ECDSA 256 EU S01 O=Amazon C=DE	A9C3227FB1CBBD1759938EF8718FDF835C0F8B6A546928BB0B4782A570CED4E5	93E3B4856211F193EBBBD0D49B93DDDEA9EC1220A12AD9F1BF3D2B0A256BBDA	10/1/2025	9/29/2033
CN=Amazon ECDSA 256 EU S02 O=Amazon C=DE	EF79C8327BEB51E7B3B4DBCCDEF239FCE367B1E09D35A78407000A0270BC232E	0CE0D894EC3562023C6CF727B97148F62F50311C55A2C4963396A27120D522DB	10/1/2025	9/29/2033
CN=Amazon ECDSA 384 EU S00 O=Amazon C=DE	A91AA45C79B99F3ABA79CC677D2BDD4623B54A3D035B37681109D7E38BA02E6C	0839542A639EFD5273FB11C0583E2B4F2C662724E4E8EBFA2DA1286CFF868127	10/1/2025	9/29/2033
CN=Amazon ECDSA 384 EU S01 O=Amazon C=DE	9A471687404FB5C3AAA5B218047A3255A41997C85B6AA8009F4C3DBEFE7A9299	764A931C8D29AEA402511E04FE54E23CAF22DB4D852954C9180CBA39DA101F7F	10/1/2025	9/29/2033
CN=Amazon ECDSA 384 EU S02 O=Amazon C=DE	46D1B2F46F959410BD0201702CB33077A9C34F5CB23F976CDD8D328989B04B27	AC816DBEC0D572A695D3529E64B8807B86E40D78DD61820403C258A542396529	10/1/2025	9/29/2033