REPORT OF THE INDEPENDENT ACCOUNTANT

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

Scope

We have examined ATS management’s assertion that for its Certification Authority (“CA”) operations in Washington and Virginia, in the United States of America, for its CAs as enumerated in Attachment B in scope for SSL Baseline Requirements and Network Security Requirements, ATS has:

- disclosed its SSL certificate lifecycle management business practices in the applicable versions of its Amazon Trust Services Certification Practice Statement (“CPS”) and Amazon Trust Services Certificate Policy (“CP”) enumerated in Attachment A, including its commitment to provide SSL 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 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;
  - 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 throughout the period January 16, 2021 to January 15, 2022, based on the WebTrust Principles and Criteria for Certification Authorities - SSL Baseline with Network Security v2.5.

Certification Authority’s Responsibilities

ATS’ management is responsible for its assertion, including the fairness of its presentation, and the provision of its described services in accordance with the WebTrust Principles and Criteria for Certification Authorities - SSL Baseline with Network Security v2.5.
Independent 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.

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 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.

Independent Accountant’s 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 ATS’ services other than is CA operations in Washington and Virginia, in the United States of America, nor the suitability of any of ATS’ services for any customer’s intended purpose.

Other Matter

Without modifying our opinion, we noted the following other matters during our procedures:

<table>
<thead>
<tr>
<th>Matter Topic</th>
<th>Matter Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Certificate Validation</td>
</tr>
<tr>
<td></td>
<td>Amazon Trust Services disclosed in Mozilla Bug #1713978 that its CP included the deprecated domain validation Method 3.2.2.4.6.</td>
</tr>
<tr>
<td>Matter Topic</td>
<td>Matter Description</td>
</tr>
<tr>
<td>-------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>2 Certificate Revocation</td>
<td>Amazon Trust Services disclosed in Mozilla Bug #1713976 that neither its CP nor its CPS specifies the methods parties may use to demonstrate key compromise.</td>
</tr>
<tr>
<td>3 Subject Registration</td>
<td>Amazon Trust Services disclosed in Mozilla Bug #1746945 that it did not perform the CAA records check for its test website certificates.</td>
</tr>
<tr>
<td>4 CA Certificate Content</td>
<td>Amazon Trust Services disclosed in Mozilla Bug #1743935 that it had misissued CA certificates per its CP and CPS policy.</td>
</tr>
<tr>
<td></td>
<td>Amazon Trust Services disclosed in Mozilla Bug #1743943 that revocation of one of the misissued CA certificates was delayed beyond the required timeline.</td>
</tr>
</tbody>
</table>

While the ATS assertion notes all issues disclosed on Bugzilla during the engagement period, we have only noted those instances relevant to the CAs enumerated in Attachment B and applicable to the WebTrust Principles and Criteria for Certification Authorities - SSL Baseline with Network Security v2.5.

Use of the WebTrust Seal

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

April 8, 2022
## ATTACHMENT A - CERTIFICATION PRACTICE STATEMENT AND CERTIFICATE POLICY VERSIONS IN-SCOPE

<table>
<thead>
<tr>
<th>Policy Name</th>
<th>Version</th>
<th>Effective Date</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Amazon Trust Services Certificate Policy</strong></td>
<td>1.0.11</td>
<td>August 18, 2021</td>
</tr>
<tr>
<td>Amazon Trust Services Certificate Policy</td>
<td>1.0.10</td>
<td>July 23, 2021</td>
</tr>
<tr>
<td>Amazon Trust Services Certificate Policy</td>
<td>1.0.9</td>
<td>April 23, 2021</td>
</tr>
<tr>
<td>Amazon Trust Services Certificate Policy</td>
<td>1.0.8</td>
<td>March 30, 2020</td>
</tr>
<tr>
<td><strong>Amazon Trust Services Certification Practice Statement</strong></td>
<td>1.0.12</td>
<td>August 18, 2021</td>
</tr>
<tr>
<td>Amazon Trust Services Certification Practice Statement</td>
<td>1.0.11</td>
<td>July 23, 2021</td>
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<td>April 23, 2021</td>
</tr>
<tr>
<td>Amazon Trust Services Certification Practice Statement</td>
<td>1.0.9</td>
<td>March 30, 2020</td>
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## ATTACHMENT B - IN-SCOPE CAs

<table>
<thead>
<tr>
<th>Subject DN</th>
<th>SHA2 Thumbprint</th>
<th>SPKI SHA256</th>
<th>Valid From</th>
<th>Valid To</th>
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</thead>
</table>
| CN = Amazon Root CA 1  
O = Amazon  
C = US | 8ECDE6884F3D87B1125BA31AC3F9C13D7016DE7F57CC904FE1C897C6AE98196E | FBE301B031F95868C5F417  
27E41787D1C45C2F47F938  
E372A17B96850757D5A2 | 5/25/2015 | 1/16/2038 |
| CN = Amazon Root CA 2  
O = Amazon  
C = US | 1BA5B2AA8C65401A82960118F80BEC4F62304D83CEC4713A19C39C011EA46DB4 | 7F4296FC5B6A4E3B55D3C3  
69623E364AB1AF381D8FA7  
121533C906C633EA2461 | 5/25/2015 | 5/25/2040 |
| CN = Amazon Root CA 3  
O = Amazon  
C = US | 18CE6CFE7BF14E6082E347FBDE868CB31D02EBB3ADA271569F50343B46DB3A4 | 36AB32656ACFC6G5C61B7  
1613C4BF21C787F5CABBEE  
48348D58597803D7ABC9 | 5/25/2015 | 5/25/2040 |
| CN = Amazon Root CA 4  
O = Amazon  
C = US | E35D28419ED02D5CF86038CD62962458A5C695FBDEA322B0BF8B25897092 | 7FECDED5C66047D28ED64  
66854C40E074A881D10  
9254DCFB8454D4C7853C5 | 5/25/2015 | 5/25/2040 |
| CN = Starfield Services Root Certificate Authority - G2¹  
O = Starfield Technologies, Inc.  
L = Scottsdale  
S = Arizona  
C = US | 56D6905A2C88708A4B3025190EDCFEB1974A606A13C6E5290FCB2AE63EDAB5 | 28071C59AD0A0AE768DEAD  
B2BAD23BAD4580B69C360  
1B6302EAF0613AFA83F92 | 8/31/2009 | 12/31/2037 |

<table>
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<tr>
<th>Subject DN</th>
<th>SHA2 Thumbprint</th>
<th>SPKI SHA256</th>
<th>Valid From</th>
<th>Valid To</th>
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</table>
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O = Amazon  
C = US | 87DCD4DC74E60A322CD205552506D1BE64F12396258096544986B4850BC72706 | FBE301B031F95868CB5F417  
27E41787D1C45C2F47F938  
E372A17B96850757D5A2 | 5/25/2015 | 12/31/2037 |
| 391220705B75BFC3ED3CD4B3631Z1F5692DCF8226101E17079A5354AB12861 | | | 10/21/2015 | 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 Root CAs

<table>
<thead>
<tr>
<th>Subject DN</th>
<th>SHA2 Thumbprint</th>
<th>SPKI SHA256</th>
<th>Valid From</th>
<th>Valid To</th>
</tr>
</thead>
</table>
| CN = Amazon Root CA 2  
O = Amazon  
C = US | 8B358466D66126312120645A5875A6A57E3C81D98476A967604244254EAC00F0 | 7F4296FC586A4E3B35D3C3 69623E64AB1AF381DB8FA7 121533C9D6C633EAA2461 | 5/25/2015 | 12/31/2037 |
| CN = Amazon Root CA 3  
O = Amazon  
C = US | 40C826FDB22BA32A2F9DB4F94770F72B8B10DA9C8FFDA7B11E6F27AF245CB9B5E | 36ABC32656AFC645C61B7 16134BF21C787F5CABBEE 4B348D5857B03D7ABC9 | 5/25/2015 | 12/31/2037 |
| CN = Amazon Root CA 4  
O = Amazon  
C = US | 543D987FC2A6471CD84FCA52C2CF6159DF83EBFCD88DBB0B5FA3F88737F52E6 | F7EDED5C66047D28ED64 66B543C40E0743ABE81D10 92549CF845D2C7853C5 | 5/25/2015 | 12/31/2037 |

### Intermediate CAs

<table>
<thead>
<tr>
<th>Subject DN</th>
<th>SHA2 Thumbprint</th>
<th>SPKI SHA256</th>
<th>Valid From</th>
<th>Valid To</th>
</tr>
</thead>
</table>
| CN = Amazon  
OU = Server CA 0A  
O = Amazon  
C = US | DFCC775C644DB4A33AD71293433F463C8E31057CE22CB267F9D31A0353F4FC2F | B58539ECA13921CCDB80 D38D34875FDE6471C5A159 D9BEEF2A6F99983BD611 | 10/21/2015 | 10/18/2025 |
| CN = Amazon  
OU = Server CA 1A  
O = Amazon  
C = US | 39C763A9CF19D923F977D23626AB890449A44ABBB795CB815EF1EF81FEBBC1E38 | 64B258BD0311FA3F53BD99 404ACAB8762AD6E4B447DD0 A97F219FCECA1661F37C | 10/21/2015 | 10/18/2025 |
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OU = Server CA 2A  
O = Amazon  
C = US | 72130E3B28900349214617F4D6F3FB85D0B475EE78BF095CS9458A14D1828866 | 18DA5AFFF83781380BF708 1989F7D2DB1E067F14BB9 EA78AE70AAC0B0305EB | 10/21/2015 | 10/18/2025 |
| CN = Amazon  
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O = Amazon  
C = US | 205154B777EDC55A5146585A5E54EO54A70BE4AAD3B85D02318DA27B807ADF1 | 7C53B5DF791359AF6195E 6F6B73AB98C2CB9958892 B192D6F784DB925A41C | 10/21/2015 | 10/18/2025 |
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O = Amazon  
C = US | 7BED29276ACBED9F176F388BA3A67CE58155BCEF1522C7BB59ECD86B09E16ED2 | 17708DF2B7FAEC9CB1B52 15EBBB2421D97B0543C936F AC9D6E02B92F20E5C707 | 10/21/2015 | 10/18/2025 |
Amazon Trust Services, LLC (“ATS”) operates the Certification Authority (“CA”) services for the CAs enumerated in Attachment B in scope for SSL Baseline Requirements and Network Security Requirements and provides SSL CA services.

ATS management has assessed its disclosures of its certificate practices and controls over its SSL CA services. Based on that assessment, in providing its SSL CA services in Washington and Virginia, in the United States of America, ATS has:

- disclosed its SSL certificate lifecycle management business practices in the applicable versions of its Amazon Trust Services Certificate Practice Statement (“CPS”) and Amazon Trust Services Certificate Policy (“CP”) enumerated in Attachment A, including its commitment to provide SSL certificates in conformity with the CA/Browser Forum Requirements on the ATS repository, and provided such services in accordance with its disclosed practices

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ATS has disclosed the following matters publicly on Mozilla’s Bugzilla platform:

<table>
<thead>
<tr>
<th>Bug ID</th>
<th>Summary</th>
<th>Opened</th>
<th>Closed</th>
<th>Resolution</th>
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</thead>
<tbody>
<tr>
<td>1713668</td>
<td>Amazon Trust Services: ALV Errors</td>
<td>5/31/2021</td>
<td>7/30/2021</td>
<td>Fixed</td>
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<tr>
<td>1713978</td>
<td>Amazon Trust Services: Forbidden Domain Validation Method 3.2.2.4.6</td>
<td>6/1/2021</td>
<td>7/30/2021</td>
<td>Fixed</td>
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<tr>
<td>1713976</td>
<td>Amazon Trust Services: CP/CPS does not specify key compromise methods</td>
<td>6/1/2021</td>
<td>9/7/2021</td>
<td>Fixed</td>
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<tr>
<td>1719920</td>
<td>Amazon Trust Services: Revocation Time for Intermediate Certificates</td>
<td>7/9/2021</td>
<td>9/7/2021</td>
<td>Fixed</td>
</tr>
<tr>
<td>1743943</td>
<td>Amazon Trust Services - Delayed Revocation of Subordinate CA</td>
<td>12/1/2021</td>
<td>Open as of Report Date</td>
<td>---</td>
</tr>
<tr>
<td>1743935</td>
<td>Amazon Trust Services - Misissuance of Subordinate Per CPS</td>
<td>12/1/2021</td>
<td>12/22/2021</td>
<td>Fixed</td>
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<tr>
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<td>Summary</td>
<td>Opened</td>
<td>Closed</td>
<td>Resolution</td>
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<tr>
<td>--------</td>
<td>-------------------------------------------------------</td>
<td>--------------</td>
<td>--------------</td>
<td>------------</td>
</tr>
<tr>
<td>1746945</td>
<td>Amazon Trust Services - Missing CAA Check For Test Website Certificates</td>
<td>12/20/2021</td>
<td>1/14/2022</td>
<td>Fixed</td>
</tr>
</tbody>
</table>

Jonathan Kozolchyk

Jonathan Kozolchyk
Vice President
Amazon Trust Services, LLC

April 8, 2022
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## ATTACHMENT B - IN-SCOPE CAs

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27E417B7D1C45C2F47F93B  
E372A17B9650757D5A2 | 5/25/2015 | 1/16/2038 |
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69263E346AB1AF381D8BFA7  
121533C906C633EA2461 | 5/25/2015 | 5/25/2040 |
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O = Amazon  
C = US | 18CE6CFE7BF14E60B2E347B8DE68CB31D02EBBB3DA271569F50343B46DB3A4 | 36ABC32656ACFC645C61B7  
1613C4BF21C787F5CABBEE  
48348D58597803D7ABC9 | 5/25/2015 | 5/25/2040 |
| CN = Amazon Root CA 4  
O = Amazon  
C = US | E35D28419ED02025CFA69038CD623962458DA5C695FBDEA3C22B08FBB255797092 | F7ECD7D5560B47D25B6D4  
66B543C0E0743A8B1D10  
9254DF845D4C7853C5 | 5/25/2015 | 5/25/2040 |
| CN = Starfield Services Root Certificate Authority - G2†  
O = Starfield Technologies, Inc.  
L = Scottsdale  
S = Arizona  
C = US | 56B6905A2C88708A4B3025190EDCFEDB1974A606A13C6E5290FCB2AE63E4A85F | 2B071C59A0A0AE7680EAD  
B2B23AD4580B69C360  
1B630CEAF6013AFA93F92 | 8/31/2009 | 12/31/2037 |

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</tr>
</thead>
</table>
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O = Amazon  
C = US | 87DCD4DC746-40A322CD20552506D1BE64F1259625809654986B48508BC72706 | FBE3018031FF9586BCBF417  
27E417B7D1C45C2F47F93B  
E372A17B9650757D5A2 | 5/25/2015 | 12/31/2037 |
| CN = Amazon Root CA 2  
O = Amazon  
C = US | 391220705B75BCF3ED3CD4B3631213F569D2CF8226101E170799A5354AB12861 | 7F4296FC5B66A4E3B35D3C3  
69263E346AB1AF381D8BFA7  
121533C906C633EA2461 | 10/21/2015 | 12/31/2037 |
| CN = Amazon Root CA 3  
O = Amazon  
C = US | 8B35B4660D66126312120645A5875A6A57E3C81BD98476A967604244254EAC00F0 | 36ABC32656ACFC645C61B7  
1613C4BF21C787F5CABBEE  
48348D58597803D7ABC9 | 5/25/2015 | 12/31/2037 |

† 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.
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<tr>
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<td>543D9B7FC2A6471CD84FCA52C2CF6159DF83EDFC8D88D8B08B5AF3F88737F52E6</td>
<td>F7ECDDED5C66047D28ED64668543C40E0743ABE81D109254DCF845D4C2C7853C5</td>
<td>5/25/2015</td>
<td>12/31/2037</td>
</tr>
</tbody>
</table>

### Intermediate CAs

<table>
<thead>
<tr>
<th>Subject DN</th>
<th>SHA2 Thumbprint</th>
<th>SPKI SHA256</th>
<th>Valid From</th>
<th>Valid To</th>
</tr>
</thead>
<tbody>
<tr>
<td>CN = Amazon OU = Server CA 0A O = Amazon C = US</td>
<td>DFCC775C644DB4A33AD71293433F463C8E31057CE22CB267F9D31A0353F4FC2F</td>
<td>B58539ECAA13921CCDB80D38D34B75FDE6471C5A159D9BEEF2FA6F99983BD611</td>
<td>10/21/2015</td>
<td>10/18/2025</td>
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<td>39C763A9CF19D923F977D23626AB890449A444AB8B795C815EF1EF81FEBC1E38</td>
<td>64BB55B0D8311FFA3F53BD99404CAB8762AD6E048447D0A97F219FCECA1661F37C</td>
<td>10/21/2015</td>
<td>10/18/2025</td>
</tr>
<tr>
<td>CN = Amazon OU = Server CA 2A O = Amazon C = US</td>
<td>72130E3B28900349214617F4D6F3FB85D08475EE78BF095C59458A14D828866</td>
<td>1BDA5AFF837B1380BF708198F9F7D2BD1ED67F14BB9EA7B8E70AAC080303E7B</td>
<td>10/21/2015</td>
<td>10/18/2025</td>
</tr>
<tr>
<td>CN = Amazon OU = Server CA 3A O = Amazon C = US</td>
<td>205154B777EDC55A5146585A5E54E054A70BE4AAD3BB5D0D2318DA27B807ADEF1</td>
<td>7C53B5DF7913D9A6F6195E6F873B73A98C2C89908B892B192DFD784DB925A41C</td>
<td>10/21/2015</td>
<td>10/18/2025</td>
</tr>
<tr>
<td>CN = Amazon OU = Server CA 4A O = Amazon C = US</td>
<td>7BED29276ACBED9F176F38BBA3A67CE5815B5CBF1522C7BB59ECD86B09E16ED2</td>
<td>177080EFF2B7FAEC9CB15B215EBB242197B0543C936FAC9D6E02892F20E5C707</td>
<td>10/21/2015</td>
<td>10/18/2025</td>
</tr>
</tbody>
</table>