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, 2022 to January 15, 2023, 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 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 CA Certificate Content</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 from January 16, 2022 through the date of this report, 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 6, 2023
## ATTACHMENT A - CERTIFICATION PRACTICE STATEMENT AND CERTIFICATE POLICY VERSIONS IN-SCOPE

<table>
<thead>
<tr>
<th>Policy Name</th>
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<tbody>
<tr>
<td>Amazon Trust Services Certificate Policy</td>
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</tr>
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<td>Amazon Trust Services Certificate Policy</td>
<td>1.0.11</td>
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<td>Amazon Trust Services Certification Practices Statement</td>
<td>1.0.13</td>
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## ATTACHMENT B - IN-SCOPE CAs

<table>
<thead>
<tr>
<th>Root CA Certificates</th>
<th>SHA2 Thumbprint</th>
<th>SPKI SHA256</th>
<th>Valid From</th>
<th>Valid To</th>
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<tr>
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<tr>
<th>Cross-Signed CA Certificates</th>
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<th>Valid To</th>
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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.
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## Intermediate CA Certificates

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<td>CN = Amazon &lt;br&gt; OU = Server CA 3A &lt;br&gt; O = Amazon &lt;br&gt; C = US</td>
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<td>10/21/2015</td>
<td>10/18/2025</td>
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</table>
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. These matters were included below due to being open during the period January 16, 2022, through the date of this report:
<table>
<thead>
<tr>
<th>Bug ID</th>
<th>Summary</th>
<th>Opened</th>
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<th>Resolution</th>
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<tbody>
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<td>1743943</td>
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<td>12/1/2021</td>
<td>Open</td>
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<tr>
<td>1757615</td>
<td>Amazon Trust Services - Overdue audit statements for intermediate certificates</td>
<td>3/1/2022</td>
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<td>Fixed</td>
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<tr>
<td>1800405</td>
<td>Amazon Trust Services - DigiCert: 404 error when fetching CRL</td>
<td>11/13/2022</td>
<td>12/5/2022</td>
<td>Fixed</td>
</tr>
</tbody>
</table>

Jonathan Kozolchyk
Vice President
Amazon Trust Services, LLC

April 6, 2023
### ATTACHMENT A - CERTIFICATION PRACTICE STATEMENT AND CERTIFICATE POLICY VERSIONS IN-SCOPE

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## ATTACHMENT B - IN-SCOPE CAs

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696236E4AB1AF381D8FA7  
121533C9D6C633EA2461 | 5/25/2015 | 5/25/2040 |
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C = US | 1B654CFE7BF14E60B54645B823A3D025748CD62369624583A5C695FBDEA3C22B0BB2589092 | 36ABC32656ACF6C45C61B7  
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48348D58597803D7ABC9 | 5/25/2015 | 5/25/2040 |
| CN = Amazon Root CA 4  
O = Amazon  
C = US | E35D28419E025CFA69038CD62369624583A5C695FBDEA3C22B0BB2589092 | F7EC5D5C66047D28EBD4  
66B543C4E0743ABE81D10  
9254D984D4C2C7B853C5 | 5/25/2015 | 5/25/2040 |
| CN = Starfield Services  
Root Certificate Authority - G2  
O = Starfield Technologies, Inc.  
L = Scottsdale  
S = Arizona  
C = US | 56B6905A2C88708A4B3025190EDCF6EB1974A606A13C6E5290FCB2AE63E6A8F5 | 28071C59A0A0AEE7B0EAD  
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696236E4AB1AF381D8FA7  
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