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, throughout the period January 16, 2020 to January 15, 2021 for its CAs as enumerated in Attachment B, ATS has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environment control 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
- maintained effective controls to provide reasonable assurance that:
  - ATS’ CPS is consistent with its CP; and
  - ATS provides its services in accordance with its CP and CPS
- maintained effective controls to provide reasonable assurance that:
  - the integrity of keys and certificates it manages is established and protected throughout their lifecycles;
  - the integrity of subscriber keys and certificates it manages is established and protected throughout their lifecycles;
  - subscriber information is properly authenticated; and
  - subordinate CA certificate requests are accurate, authenticated, and approved
- 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, 2020 to January 15, 2021, based on the WebTrust Principles and Criteria for Certification Authorities v2.2.

ATS does not escrow CA keys, does not provide certificate suspension services, and does not provide the subscriber key lifecycle management services. Accordingly, our examination did not extend to controls that would address those criteria.
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 v2.2.

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.

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

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.

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 its CA operations in various locations in the United States of America, nor the suitability of any of ATS’ services for any customer’s intended purpose.

Other Matter

The World Health Organization classified the COVID-19 outbreak as a pandemic in March 2020. Based on the rapid increase in exposure globally, the gravity or length of the impact of the COVID-19 outbreak cannot be determined at this time.
Use of the WebTrust Seal

ATS’ use of the WebTrust for Certification Authorities 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 12, 2021
## 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>
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<tbody>
<tr>
<td>Amazon Trust Services Certification Practice Statement</td>
<td>1.0.9</td>
<td>March 30, 2020</td>
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<tr>
<td>Amazon Trust Services Certification Practice Statement</td>
<td>1.0.8</td>
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<td>Amazon Trust Services Certificate Policy</td>
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<td>December 18, 2019</td>
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### ATTACHMENT B - IN-SCOPE CAs

<table>
<thead>
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<th>Subject DN</th>
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<th>SPKI SHA256</th>
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| CN = Starfield Services Root Certificate Authority - G2  
O = Starfield Technologies, Inc.  
L = Scottsdale  
S = Arizona  

### Cross-Signed Root CAs

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<th>Subject DN</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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<td>10/21/2015</td>
<td>10/18/2025</td>
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Amazon Trust Services, LLC ("ATS") operates the Certification Authority ("CA") services for the CAs enumerated in Attachment B, and provides the following CA services:

- Subscriber registration
- Certificate renewal
- Certificate rekey
- Certificate issuance
- Certificate distribution
- Certificate revocation
- Certificate validation
- Subordinate CA and cross-certification

The management of ATS is responsible for establishing and maintaining effective controls over its CA operations, including its CA business practices disclosure on its repository, CA business practices management, CA environmental controls, CA key lifecycle management controls, certificate lifecycle management controls, and subordinate CA 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’ CA 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 CA services. Based on that assessment, in ATS management’s opinion, in providing its CA services in Washington and Virginia, in the United States of America, throughout the period January 16, 2020 to January 15, 2021, ATS has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environment control 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

- maintained effective controls to provide reasonable assurance that:
  - ATS’ CPS is consistent with its CP; and
  - ATS provides its services in accordance with its CP and CPS

- maintained effective controls to provide reasonable assurance that:
  - the integrity of keys and certificates it manages is established and protected throughout their lifecycles;
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maintained effective controls to provide reasonable assurance that:
  o logical and physical access to CA systems and data is restricted to authorized individuals;
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  o CA systems development, maintenance, and operations are properly authorized and performed to maintain CA systems integrity

throughout the period January 16, 2020 to January 15, 2021, based on the WebTrust Principles and Criteria for Certification Authorities v2.2, including the following:

CA Business Practices Disclosure

- Certification Practice Statement (CPS)
- Certificate Policy (CP)

CA Business Practices Management

- Certification Practice Statement (CPS) Management
- CP and CPS Consistency

CA Environmental Controls

- Security Management
- Asset Classification and Management
- Personnel Security
- Physical and Environmental Security
- Operations Management
- System Access Management
- System Development, Maintenance, and Change Management
- Disaster Recovery, Backups, and Business Continuity Management
- Monitoring and Compliance
- Audit Logging

CA Key Lifecycle Management Controls

- CA Key Generation
- CA Key Storage, Backup, and Recovery
- CA Public Key Distribution
- CA Key Usage
- CA Key Archival
- CA Key Destruction
- CA Key Compromise
- CA Cryptographic Hardware Life Cycle Management
- CA Key Transportation
- CA Key Migration
Certificate Lifecycle Management Controls

- Subscriber Registration
- Certificate Renewal
- Certificate Rekey
- Certificate Issuance
- Certificate Distribution
- Certificate Revocation
- Certificate Validation

Subordinate CA and Cross Certificate Lifecycle Management Controls

- Subordinate CA Certificate and Cross Certificate Lifecycle Management

ATS does not escrow CA keys, does not provide certificate suspension services, and does not provide subscriber key lifecycle management services. Accordingly, our assertion does not extend to controls that would address those criteria.

ATS did not delegate subscriber information authentication to any third parties. ATS maintained controls over subscriber information authentication for all certificates issued.

Jonathan Kozolchyk
Vice President
Amazon Trust Services LLC

April 12, 2021
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121533C906C633EA2461 | 5/25/2015 | 5/25/2020 |
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48348D58597803D7ABC9 | 5/25/2015 | 5/25/2020 |
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66543C4E0743AB81D10  
9254DCBF84D4C27853C5 | 5/25/2015 | 5/25/2020 |
| CN = Starfield Services  
Root Certificate Authority - G2  
O = Starfield Technologies, Inc.  
L = Scottsdale  
S = Arizona  
C = US | 56B6905A2C88708A4B3025190EDCFEDB1974A606A13C6E5290FCBAE63EDAB5 | 2B071C59A0A0AE7680EAD  
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