REPORT OF THE INDEPENDENT ACCOUNTANT

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

Scope

We have examined for ATS’ Certification Authority (“CA”) operations in Washington and Virginia, in the United States of America, for its CAs as enumerated in Attachment B, ATS has:

- disclosed its code signing (“CS”) 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 CS certificates in conformity with the Code Signing Working Group 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 CS certificates it manages is established and protected throughout their lifecycles throughout the period January 16, 2020 to January 15, 2021, based on the WebTrust Principles and Criteria for Certification Authorities - Publicly Trusted Code Signing Certificates v1.0.1.

Certification Authority’s Responsibilities

ATS’s management is responsible for these disclosures and for maintaining effective controls based on WebTrust Principles and Criteria for Certification Authorities - Publicly Trusted Code Signing Certificates v1.0.1.

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

- disclosed its CS certificate lifecycle management business practices in the applicable versions of its CPS and CP enumerated in Attachment A, including its commitment to provide CS certificates in conformity with the Code Signing Working Group 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 CS certificates it manages is established and protected throughout their lifecycles

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.

During the examination period, ATS did not issue any CS subscriber certificates.

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.

Basis for Modified Opinion

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

<table>
<thead>
<tr>
<th>Impacted WebTrust Trust Principles and Criteria for Certification Authorities - Publicly Trusted Code Signing Certificates</th>
<th>Control Deficiency Noted</th>
</tr>
</thead>
<tbody>
<tr>
<td>2-9.1</td>
<td>ATS did not operate a timestamp authority during the examination period.</td>
</tr>
</tbody>
</table>

The CA maintains controls to provide reasonable assurance that:

- It operates a RFC-3161-compliant Timestamp Authority that is available for use by customers of its Code Signing Certificates
- It recommends to Subscribers that they use the CA’s Timestamping Authority to time-stamp signed code.

Modified Opinion

In our opinion, except for the matter described in the preceding table, throughout the period January 16, 2020 to January 15, 2021, ATS has, in all material respects:

- disclosed its CS certificate lifecycle management business practices in the applicable versions of its CPS and CP enumerated in Attachment A, including its commitment to provide CS certificates in conformity with the Code Signing Working Group 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 CS certificates it manages is established and protected throughout their lifecycles throughout the period January 16, 2020 to January 15, 2021, based on the WebTrust Principles and Criteria for Certification Authorities - Publicly Trusted Code Signing Certificates v1.0.1.

This report does not include any representation as to the quality of ATS’ services other than its CA services 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

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

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>
</tr>
</thead>
<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>
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</tr>
<tr>
<td>Amazon Trust Services Certificate Policy</td>
<td>1.0.7</td>
<td>December 18, 2019</td>
</tr>
</tbody>
</table>
### 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>
</tr>
</thead>
<tbody>
<tr>
<td>CN = Amazon Root CA 1 O = Amazon C = US</td>
<td>8ECDE6884F3D87B1123BA31AC3FCB13D7016DE7F5CC904F1C0C97C6AE98196E</td>
<td>FBE301831F95868CBF41727E417B7D1C45C2F47F93B</td>
<td>5/25/2015</td>
<td>1/16/2038</td>
</tr>
<tr>
<td>CN = Amazon Root CA 2 O = Amazon C = US</td>
<td>1BA5B2AA8C65401A8285D0188F808BEC4F62304D33CEC471A19C39C0111EA462B4</td>
<td>7F4296FC586A4E3B35D3C369623E3641AF381D8FA7</td>
<td>5/25/2015</td>
<td>5/25/2020</td>
</tr>
<tr>
<td>CN = Amazon Root CA 4 O = Amazon C = US</td>
<td>E35D2B49E02025CFA69038CD6239624580A5C695FBDEA322BB0BF25897092</td>
<td>F7CDED5C66047D28ED6466B43C40E0743AEB81D10921DF845D4C2C7853C5</td>
<td>5/25/2015</td>
<td>5/25/2020</td>
</tr>
</tbody>
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### Cross-Signed Root CAs

<table>
<thead>
<tr>
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<tr>
<td>CN = Amazon Root CA 1 O = Amazon C = US</td>
<td>87DCD4DC746A0A3223C2D05555250D18E46F12956280965498684850BC72706</td>
<td>FBE301831F95868CBF41727E417B7D1C45C2F47F93B</td>
<td>5/25/2015</td>
<td>12/31/2037</td>
</tr>
<tr>
<td></td>
<td>391220785BCF3ED3CD4B3631213F569D2CF8226101E170799A5354AB12861</td>
<td></td>
<td>10/21/2015</td>
<td>12/31/2037</td>
</tr>
</tbody>
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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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| CN = Amazon Root CA 2  
O = Amazon  
C = US | 8B358466D66126312120645A5875A6A57E3C81D98476A967604244254EAC00F0 | 7F4296FC5B6A4E3B35D3C369623E364AB1AF381DBFA7121533C9D6C633EAA2461 | 5/25/2015 | 12/31/2037 |
| CN = Amazon Root CA 3  
O = Amazon  
| CN = Amazon Root CA 4  
O = Amazon  
C = US | 543D987FC2A6471CD84FC62C2CF6159DF83EBFCD88DB085AF3F88737F52E6 | F7ECDED5C66047D28ED6466B543C0E0743ABE81D109254DCF845D4C2C7853C5 | 5/25/2015 | 12/31/2037 |
Amazon Trust Services LLC ("ATS") operates the Certification Authority ("CA") services for the CAs enumerated in Attachment B in scope, and provides code signing ("CS") CA services.

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

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<td>2-9.1 The CA maintains controls to provide reasonable assurance that:</td>
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Based on that assessment, in ATS management’s opinion, except for the matter described in the preceding table in providing its CS 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 CS 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 CS certificates in conformity with the Code Signing Working Group requirements on the ATS repository, and provided such services in accordance with its disclosed practices
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During the examination period, ATS did not issue any CS subscriber certificates.

Jonathan Kozolchyk
Vice President
Amazon Trust Services LLC
April 12, 2021
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69623E364ABA1F381D8FA7  
121533C9D6C633EA2461 | 5/25/2015 | 5/25/2040 |
| CN = Amazon Root CA 3  
O = Amazon  
C = US | 18CE6C Heather  
O = Amazon  
C = US | 36AB3C32656ACFC645C61B7  
1613C4BF21C787F5CABBBEE  
48348D58597803D7ABC9 | 5/25/2015 | 5/25/2040 |
| CN = Amazon Root CA 4  
O = Amazon  
C = US | E35D28419ED02025CFA69038CD623962458DA5C695FBDEA3C22B08FB25897902 | F7ECDDED5C66047D28ED64  
66B543CE0E743ABE81D10  
9254DCF845D4C27853C5 | 5/25/2015 | 5/25/2040 |
| CN = Starfield Services Root Certificate Authority - G2  
O = Starfield Technologies, Inc.  
L = Scottsdale  
S = Arizona  
C = US | 568D6905A2C88708A4B302519EDCFEDB1974A606A13C6E5290FCB2AE63EDAB5 | 2B071C59A0A0AE76B0EAD  
B2BAD23BAD4580B69C360  
1B630C2EAF0613AFA83F92 | 8/31/2009 | 12/31/2037 |

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<td>F7ECD86D47D28ED64 66B543C40E0743AEB81D10 9254DCF845D4C2C7853C5</td>
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