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Attention : Mrs C Maherry
Directors of LAW Trusted Third Party Services
(Pty) Limited
LAW Trusted Third Party Services (Pty) Ltd
5 Bauhinia Street
Highveld Technopark
Cambridge Office Park, Block A
Centurion, 7441

Your ref Independent Assurance Report

Our ref 261619 LAWtrust _PKO_Audit_2016

Contact Frank Rizzo (+27827192059)

13 April 2016

Dear Mrs Maherry

Independent Assurance Report on the LAWtrust Public Key Operations

We have undertaken a reasonable assurance engagement on the statement by the Directors of LAW Trusted Third Party Services (Pty) Ltd (LAWtrust) that for the period 1 January 2015 to 31 December 2015 LAWtrust has:

- Disclosed its key and certificate life cycle management, business and information privacy practices in its Certification Practice Statements (CPS) for:
 - LAWtrust 2048 Issuing Certificate Authority (LAWtrust2048 CA)
 - LAWtrust 2048 Root Certificate Authority (Root CA); and
 - LAWtrust 2048 AeSign Certificate Authority (AeSign CA).
- Published the CPS for each CA on the website of the LAWtrust Policy Authority and provided services in accordance with the disclosed practices;
- Maintained effective controls to provide reasonable assurance that:
 - Subscriber information was properly authenticated for the registration activities performed by LAWtrust; and
 - The integrity of keys and certificates it managed were established and protected throughout their life cycles.
- Maintained effective controls to provide reasonable assurance that:
 - Subscriber and relying party information was restricted to authorised individuals and protected from use not specified in the CA's business practices disclosure;
 - The continuity of key and certificate life cycle management operations was maintained; and
 - CA systems development, maintenance and operations were properly authorised and performed to maintain CA systems integrity.

KPMG Services Proprietary Limited a company incorporated under the South African Companies Act and a member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative ("KPMG International"), a Swiss entity.

KPMG Services Proprietary Limited is not a Registered Auditor in terms of the Auditing Profession Act, 26 of 2005 and does not provide audit services as defined in Section 1 of this Act.

Registration number 1999/012876/07

Policy Board:

Chief Executive: TH Hoole

Executive Directors: N Dlomu, M Letsitsi, SL Louw, NKS Malaba, MM Mapaya, M Oddy, CAT Smit

Other Directors:

ZH De Beer, LP Fourie, N Fubu, AH Jaffer (Chairman of the Board), FA Karreem, ME Magondo, AMS Mokgabudi, GM Pickering, JN Pierce, T Rossouw, M Saloojee, GCC Smith

The company's principal place of business is at KPMG Crescent, 85 Empire Road, Parktown, where a list of the directors' names is available for inspection.

LAWtrust have based their public key operations on American Institute of Certified Public Accountants (AICPA) / Chartered Professional Accountants of Canada (CPA) Web Trust for Certificate Authorities Criteria (version 2.0, July 1, 2011) standard for the following CA's within the LAWtrust Public Key Infrastructure (referred to collectively as the "LAWtrust PKI"):

- LAWtrust 2048 Issuing Certificate Authority (LAWtrust2048 CA)
- LAWtrust 2048 Root Certificate Authority (Root CA); and
- LAWtrust 2048 AeSign Certificate Authority (AeSign CA).

The above shall collectively be referred to as the Directors' statement that controls have been implemented based on the AICPA/CPA Web Trust for Certificate Authorities Criteria (version 2.0, July 1, 2011) at 31 December 2015.

This report is prepared for the purpose of providing information to AICPA/CPA Web Trust Certification Authorities in order to obtain Web Trust Certification.

Directors' responsibility for the statement and implementation of controls

The Directors of LAWtrust are responsible for preparing the statement in accordance with the requirements of the AICPA/CPA Web Trust for Certificate Authorities Criteria (version 2.0, July 1, 2011). The Directors are also responsible for implementing the controls required ensure that the company has complied with the AICPA/CPA Web Trust for Certificate Authorities Criteria (version 2.0, July 1, 2011).

Our responsibility

Our responsibility is to express a reasonable assurance opinion on the statement based on our work performed. We conducted our engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information. Our procedures selected depend on our judgment.

We have complied with the International Federation of Accountants' Code of Ethics for Professional Accountants, which includes comprehensive independence and other requirements founded on fundamental principles of objectivity, professional competence and due care, confidentiality and professional behaviour.

In accordance with International Standard on Quality Control 1, KPMG Services Proprietary Limited maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Summary of work performed

The work that we performed included:

- Obtaining an understanding of LAWtrust's controls governing:
 - key and certificate life cycle management;
 - business and information privacy practices;
 - key and certificate integrity;

- the authenticity and privacy of subscriber and relying party information;
- continuity of key and certificate life cycle management operations; and
- development, maintenance and operations of CA systems.
- Testing transactions executed in accordance with disclosed key and certificate life cycle management business and information privacy practices;
- Testing and evaluating the operating effectiveness of the controls; and
- Performing such other procedures as we considered necessary in the circumstances.

Limitations of controls

Due to inherent limitations in controls, errors or fraud may occur and may not be detected. Furthermore, the projection of any conclusions based on our findings, to future periods is subject to the following risk:

- Changes made to the system or controls after our review;
- Changes in the processing requirements;
- Changes required due to the passage of time; or
- The degree of compliance with the policies and procedures may alter the validity of such conclusions.

Conclusion

In our opinion, the Directors' statement that controls have been implemented by LAWtrust based on the AICPA/CPA Web Trust for Certificate Authorities Criteria (version 2.0, July 1, 2011) for the period 01 January 2015 to 31 December 2015 is, in all material respects, fairly stated.

Restriction on use

As indicated, this report is for the purpose of providing information to the AICPA/CPA Web Trust Certification Authorities in order to obtain Web Trust Certification and may not be suitable for another purpose. This report is intended only for customers who have used LAWtrust's services, who have a sufficient understanding to consider it, along with other information including information about controls operated by customers themselves, when obtaining an understanding of customers' information systems.

Yours sincerely

Per F Rizzo
Director

Statement by the Directors as to its Disclosure of its Business Practices and its Controls over its Certification Authority Operations during the period 01 January 2015 to 31 December 2015

13 April 2016

LAW Trusted Third Party Services (Pty) Ltd (“LAWtrust”) operates as a Certification Authority (“CA”) known as LAWtrust. LAWtrust, operating an Entrust chained Issuing CA, an AeSign chained CA and a separate off-line Root CA, provides the following certification authority services:

- Certificate Request
- Subscriber Registration
- Certificate Issuance
- Certificate Distribution
- Subscriber Key Management (where applicable)¹
- Certificate Renewal
- Certificate Rekey
- Certificate Revocation
- Certificate Suspension
- Certificate Status Information Processing

The Directors of LAWtrust are responsible for establishing and maintaining effective controls over its CA operations, including CA business practices disclosure in its Certification Practice Statements on its website, service integrity (including key and certificate life cycle management controls), and CA environmental 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 provide only reasonable assurance with respect to LAWtrust’s Certification Authority operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

The Directors have assessed LAWtrust’s controls over its CA operations for the period from 01 January 2015 to 31 December 2015. Based on that assessment, it is the opinion of the Directors of LAWtrust, in providing its CA services at LAWtrust House (located at 5 Bauhinia Street, Highveld Technopark, Cambridge Office Park, Block A, Centurion, South Africa) and the LAWtrust Vault (located at Vodacom Corporate Park, 082 Vodacom Boulevard, Vodavalley, Midrand, South Africa), that at 31 December 2015 it has:

- disclosed its key and certificate life cycle management business and information privacy practices and provided such services in accordance with its disclosed practices;
- published the CPS for each CA on the website of the LAWtrust Policy Authority and provided services in accordance with the disclosed practices;
- maintained effective controls to provide reasonable assurance that:

¹ LAWtrust provides some Key Management Services for its Enterprise solution. However, these services exclude the following: Subscriber Key Generation; Subscriber Key Destruction and Subscriber Private Signing Key Escrow.

- subscriber information was properly authenticated (for the registration activities performed by LAWtrust); and
- the integrity of keys and certificates it managed was established and protected throughout their life cycles;
- maintained effective controls to provide reasonable assurance that:
 - subscriber and relying party information was restricted to authorised individuals and protected from uses not specified in the CA's business practices disclosure;
 - the continuity of key and certificate life cycle management operations was maintained; and
 - CA systems development, maintenance and operations were properly authorised and performed to maintain CA systems integrity;

LAWtrust have based their public key operations on American Institute of Certified Public Accountants (AICPA) / Chartered Professional Accountants of Canada (CPA) Web Trust for Certificate Authorities Criteria (version 2.0, July 1, 2011) for the following CA's (referred to collectively as the "LAWtrust PKI"):

- LAWtrust 2048 Issuing Certificate Authority (LAWtrust2048 CA)
- LAWtrust 2048 Root Certificate Authority (Root CA); and
- LAWtrust 2048 AeSign Certificate Authority (AeSign CA).

LAWtrust directors further assert that it has operated the relevant services in accordance with the criteria defined in AICPA/CPA WebTrust for Certification Authorities V2.0; including the following:

CA Business Practices Disclosure

- Certification Practice Statement (CPS)
- Certificate Policy

CA Environmental Controls

- Certification Practice Statement and Certificate Policy Management
- Certification Practice Statement and Certificate Policy Consistency
- Security Management
- Asset Classification and Management
- Personnel Security
- Physical and Environmental Security
- Operations Management
- System Access Management
- Systems Development and Maintenance
- Business Continuity Management
- Monitoring and Compliance
- Audit Logging

CA Service Integrity Assessment

- CA Key Life Cycle Management Controls
 - CA Key Generation

- CA Key Storage, Backup and Recovery
- CA Public Key Distribution
- CA Key Usage
- CA Key Archival and Destruction
- CA Key Compromise
- CA Cryptographic Hardware Life Cycle Management
- Subscriber Key Life Cycle Management Controls
 - CA-Provided Subscriber Key Storage and Recovery Services
 - Requirements for Subscriber Key Management
- Certificate Life Cycle Management Controls
 - Subscriber Registration
 - Certificate Renewal
 - Certificate Rekey
 - Certificate Issuance
 - Certificate Distribution
 - Certificate Revocation
 - Certificate Suspension
 - Certificate Validation
- Subordinate CA Certificate Life Cycle Management Controls
 - Subordinate CA Certificate Life Cycle Management

Christi Maherry



Chief Executive Officer
25 April 2016