

## Report of Independent Accountants

To the Management of Web.com Group, Inc.

We have examined the accompanying [assertion](#) made by the management of Web.com Group, Inc (“Web.com” the parent company of “Network Solutions”), titled *Management’s Assertion Regarding the Effectiveness of Its Controls Over the SSL Certification Authority Operation Based on the Trust Services Principles and Criteria for Certification Authorities Version 2.1*, that provides Network Solutions’ Certification Authority (CA) services at Herndon, Virginia, United States and the data centers and back-end office support locations listed in Appendix A for the Root and Subordinate Keys listed in Appendix B during the period from April 1, 2018 through March 31, 2019. Web.com has:

- ▶ Disclosed Network Solutions’ business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in its [Certification Practice Statement Version 3.0](#)
- ▶ Maintained effective controls to provide reasonable assurance that that Network Solutions provided its services in accordance with its Certification Practice Statement
- ▶ 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 (for the registration activities performed by Network Solutions); 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

based on the American Institute of Certified Public Accountants (AICPA)’s [Trust Services Principles and Criteria for Certification Authorities 2.1](#).

Web.com’s management is responsible for its assertion and for specifying the aforementioned Criteria. Our responsibility is to express an opinion on management’s assertion based on our examination.

Web.com makes use of external registration authorities for specific subscriber registration activities as disclosed in Network Solutions' business practice disclosures. Our examination did not extend to the controls of external registration authorities.

Network Solutions does not escrow its CA keys, does not provide subscriber key generation services, and does not provide certificate suspension services. Accordingly, our examination did not extend to controls that would address those criteria.

Our examination was conducted in accordance with attestation standards established by the AICPA. Those standards require that we plan and perform our 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, which includes: (1) obtaining an understanding of Network Solutions' key and certificate life cycle management business practices, policies, processes and controls, and its suitability of the design and implementation of the controls intended to achieve the Criteria and examining evidence supporting management's assertion and performing such other procedures over key and certificate integrity, over the authenticity and confidentiality of subscriber and relying party information, over the continuity of key and certificate life cycle management operations, and over the development, maintenance and operation of systems integrity as we considered necessary in the circumstances; (2) selectively testing transactions executed in accordance with disclosed key and certificate life cycle management business practices; (3) testing and evaluating the operating effectiveness of the controls; and (4) performing such other procedures as we considered necessary in the circumstances. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, 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 Network Solutions 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. We have performed no procedures to evaluate the effectiveness of controls at individual subscriber and relying party locations.

Our examination was not conducted for the purpose of evaluating Network Solutions' cybersecurity risk management program. Accordingly, we do not express an opinion or any other form of assurance on its cybersecurity risk management program.

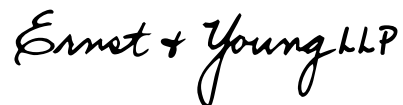
There are inherent limitations in the effectiveness of any system of internal control, including the possibility of human error and the circumvention of controls. Because of inherent limitations in its internal control Network Solutions may achieve reasonable, but not absolute assurance that all security events are prevented and, for those controls may provide reasonable, but not absolute assurance that its commitments and system requirements are achieved. 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.

Examples of inherent limitations of internal controls related to security include (a) vulnerabilities in information technology components as a result of design by their manufacturer or developer; (b) breakdown of internal control at a vendor or business partner; and (c) persistent attackers with the resources to use advanced technical means and sophisticated social engineering techniques specifically targeting the entity. Furthermore, the projection of any evaluations of effectiveness to future periods is subject to the risk that controls may become inadequate because of changes in conditions, that the degree of compliance with such controls may deteriorate, or that changes made to the system or controls, or the failure to make needed changes to the system or controls, may alter the validity of such evaluations.

In our opinion, Web.com management's assertion referred to above, is fairly stated, in all material respects, based on the aforementioned criteria.

The WebTrust seal of assurance for Certification Authority on Network Solutions' website 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.

This report does not include any representation as to the quality of Network Solutions' CA services beyond those covered by the [Trust Services Principles and Criteria for Certification Authorities Version 2.1](#) criteria, or the suitability of any of Network Solutions' services for any customer's intended purpose.



June 26, 2019

**Management's Assertion Regarding the Effectiveness of Its Controls  
Over the SSL Certification Authority Operation  
Based on the Trust Services Principles and Criteria for Certification Authorities Version 2.1**

June 26, 2019

We, as management of Web.com Group, Inc, the parent company of Network Solutions are responsible for operating the Network Solutions' Certification Authority (CA) at Herndon, Virginia for the Root CA(s) and Subordinate CA(s) listed in Appendix B.

Network Solutions' CA services provide the following certification authority services:

- ▶ Subscriber registration
- ▶ Certificate renewal
- ▶ Certificate rekey
- ▶ Certificate issuance
- ▶ Certificate distribution
- ▶ Certificate revocation
- ▶ Certificate suspension (not applicable – service not provided by Network Solutions)
- ▶ Certificate validation
- ▶ Subscriber key generation and management

Management of Web.com is responsible for establishing and maintaining effective controls over Network Solutions' CA operations, including its CA business practices disclosure on its website CA business practices management, CA environmental controls, CA key lifecycle management controls, subscriber 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.

Controls have inherent limitations, 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 Network Solutions' CA operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

Management of Web.com has assessed the disclosure of its certificate practices and its controls over Network Solutions' CA operations. Based on that assessment, in Web.com Management's opinion, in providing Network Solutions' CA services for the Root CA(s) and Subordinate CA(s) listed in Appendix B at Herndon, Virginia, United States locations during the period from April 1, 2018 through March 31, 2018 Network Solutions has:

- ▶ Disclosed its Business, Key Life Cycle Management, and Certificate Life Cycle Management, and CA Environmental Control practices in its [Certification Practice Statement \(Version 3.0\)](#) for the Root and Subordinate Keys listed in Appendix B
- ▶ Maintained effective controls to provide reasonable assurance that Network Solutions provided its services in accordance with its Certification Practice Statement

- ▶ Maintained effective controls to provide reasonable assurance that:
  - The integrity of keys and certificates it manages was established and protected throughout their life cycles;
  - The integrity of subscriber keys and certificates it manages was established and protected throughout their life cycles;
  - The Subscriber information was properly authenticated (for the registration activities performed by Network Solutions and Subordinate CA certificate requests were accurate, authenticated and approved
- ▶ Maintained effective controls to provide reasonable assurance that:
  - Logical and physical access to CA systems and data was restricted to authorized individuals;
  - The continuity of key and certificate management operations was maintained; and
  - CA systems development, maintenance and operations were properly authorized and performed to maintain CA systems integrity

for the Root Keys listed in Appendix A, based on the [Trust services Principles and Criteria for Certification Authorities Version 2.1](#), including the following:

#### **CA Business Practices Disclosure**

- ▶ Certification Practice Statement (CPS)
- ▶ Certificate Policy (CP) (CP is not applicable per Network Solutions' requirements)

#### **CA Business Practices Management**

- ▶ Certificate Policy Management (CP is not applicable per Network Solutions' requirements)
- ▶ Certification Practice Statement Management
- ▶ CP and CPS Consistency (CP is not applicable per Network Solutions' requirements)

#### **CA Environmental Controls**

- ▶ Security Management
- ▶ Asset Classification and Management
- ▶ Personnel Security
- ▶ Physical & Environmental Security
- ▶ Operations Management
- ▶ System Access Management
- ▶ System Development and Maintenance
- ▶ 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 and Destruction
- ▶ CA Key Compromise
- ▶ CA Cryptographic Hardware Lifecycle Management
- ▶ CA Key Escrow

**Subscriber Key Lifecycle Management Controls (not applicable – Subscriber Key Life Cycle Management services not provided by Network Solutions)**

- CA-Provided Subscriber Key Generation Services
- CA-Provided Subscriber Key Storage and Recovery Services
- Integrated Circuit Card (ICC) Lifecycle Management
- Requirements for Subscriber Key Management

**Certificate Lifecycle Management Controls**

- Subscriber Registration
- Certificate Renewal
- Certificate Rekey
- Certificate Issuance
- Certificate Distribution
- Certificate Revocation
- Certificate Suspension (not applicable – service not provided by Network Solutions)
- Certificate Validation

**Subordinate CA Certificate Lifecycle Management Controls**

- Subordinate CA Certificate Lifecycle Management

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## Appendix A

### Locations

Location	Function
Secaucus, NJ USA	Data Center
Manchester, UK	Data Center
Bradford, UK	Back End Office Support
Manchester, UK	Back End Office Support
Roseland, NJ USA	Back End Office Support
Murray, UT USA	Back End Office Support
Kanata, ON Canada	Back End Office Support
Chennai, IN	Back End Office Support
Mandaluyong City, PH	Back End Office Support
Iasi, Romania	Back End Office Support

## Appendix B

### Root and Subordinate Keys

#	Root/Subordinate Name	Subject Key Identifier	Certificate Serial Number	SHA-256 Fingerprint
1	CN=Network Solutions Certificate Authority O=Network Solutions L.L.C. C=US	2130C9FB00D74E98DA87AA2AD0A72EB14031A74C	1CA02DC1523B6A6D8B5C1F954AEDAC30	001686CD181F83A1B1217D305B365C41E3470A78A1D37B134A98CD547B92DAB3
2	CN=Network Solutions Certificate Authority O=Network Solutions L.L.C. C=US	2130C9FB00D74E98DA87AA2AD0A72EB14031A74C	57CB336FC25C16E6471617E3903168E0	15F0BA00A3AC7AF3AC884C072B1011A077BD77C097F40164B2F8598ABD83860C
3	CN=Network Solutions EV Server CA O=Network Solutions L.L.C. C=US	8A35E4353ABC11A19EFBF54F3466D54BAC4C6268	7AACA21D539D1454113C045ED835F8EA	29F8C1CEB1ABB0D7164791FF13B4FD268631A882F89FE658A4B5EC5172774B8B
4	CN=Network Solutions EV SSL CA O=Network Solutions L.L.C. C=US	B64E859D841F1B1DD452894E07962DF9DEF18FCC	2810921E00E65D225321CF627BFE30EE	4CC308DA28285A18542200EAB3C61DE7387B06667A6CB6574794A70FE1DEF928
5	CN=Network Solutions EV SSL CA O=Network Solutions L.L.C. C=US	B64E859D841F1B1DD452894E07962DF9DEF18FCC	331F38D107F33B3B1750C4CB09FED18D	A8FC6359078323A2541752386694FA643F1434EA063BEBAC6EF0D189E3676915
6	CN=Network Solutions EV Server CA 2 O=Network Solutions L.L.C. L=Herndon ST=VA C=US	8F374A849CF48EC7669690B4AE8FBA5EA216AAC4	548E7BA0C030C65DBE531C9C362F2F6C	799E20564D45484DFA0F28ED726037FF070D66C51DE8E2343284DECAB0FC9991
7	CN=Network Solutions ECC Certificate Authority O=Network Solutions L.L.C. L=Jacksonville ST=FL C=US	9B7BEBBC8FF83F2529847300A56F838BEE3EB00CE	79384BB4191A8D7422CCFF8532F2E4BA	2193CFEA381211A1AEAA2DE984E630643A87160B120818145EAFB8E1BC69958
8	CN=Network Solutions ECC DV Server CA O=Network Solutions L.L.C. L=Jacksonville ST=FL C=US	894A8964B520B7FA51EE85AC729AEA3BF654FE1E	008521621AD08BC6BF0F069D956C51BD33	6A7204D6F6E852A914CC0AE45AFAD91FA28D1AA4ECA3844097A929A8E11F3A17
9	CN=Network Solutions ECC EV Server CA O=Network Solutions L.L.C. L=Jacksonville ST=FL C=US	2B0B089803B61DFD0C43ECD788CB7FDA1DDFE E71	1850470B6B8C610DDE23FCC047FEA039	875FD03C6C1AA2E80C8E8467E99192A3A55D51B1F9DABAE1E6821F56C4E1E783
10	CN=Network Solutions ECC OV Server CA O=Network Solutions L.L.C. L=Jacksonville ST=FL C=US	09ED181B676853F44FC00BD3DDDFB3790EBD779	372175802BAB5311D1362884C3AE7621	1C8CF4171AE81798EB7C85DA604D8C21076D769119471E5B476C91858A4850E9
11	CN=Network Solutions RSA Certificate Authority O=Network Solutions L.L.C. L=Jacksonville ST=FL C=US	0FF14A4A757405110C1DD85B99EBBFFEEAA7D5ED7	4C034BAC67184C7FAF44084D8296C7B2	DDBF149733BC2BF8A09D7F012B01A6DEA11D7BAE26713783EF6407A2495BF189
12	CN=Network Solutions RSA DV Server CA O=Network Solutions L.L.C. L=Jacksonville ST=FL C=US	713060A80D017902590D77E151DB51E2F46CD391	759D11B752DD4B9E241CC270F824114B	7752EE9D27528294579E449BE6AB07D720BDEAE3A5E39C05AF7F26C2D431BEFF
13	CN=Network Solutions RSA EV Server CA O=Network Solutions L.L.C. L=Jacksonville ST=FL C=US	3A4079DD980526A4F09A2AF135DCAB8554723AEE	4B8427B828A7B1D89BD473C1373C6DBA	CB5535486404A82E5079AF0F9CCB7EA3DFFDF9DA4FC925B711062249E6502851
14	CN=Network Solutions RSA OV Server CA O=Network Solutions L.L.C. L=Jacksonville ST=FL C=US	CE95DAA4FC31D3B6150636184E96AC56EDFA44D5	202516B004AD5FC2698D9549005A5876	CB0BADA3AD53A99B4B7A96020C2869A43E2DB2D0183263F3303AC7E41877A665