

April 30, 2020

S.C. certSIGN S.A.  
Bvl. Tudor Vladimirescu, nr. 29 A,  
AFI Tech Park 1, Sector 5, Bucharest,  
Romania, CP 050881

In connection with your attestation engagement relating to the assertion specified in the accompanying report by S.C. certSIGN S.A. ("Company") management titled "Assertion by Management of S.C. certSIGN S.A. Regarding Its Disclosure of Its Business Practices and Its Controls Over its Certification Authority Operations During the Period February 8, 2019 through February 7, 2020" (Management's Assertion) based on the American Institute of Certified Public Accountants (AICPA) / Canadian Institute of Chartered Accountants (CICA) *Trust Services Principles and Criteria for Certification Authorities Version 2.2* throughout the period February 8, 2019 to February 7, 2020, we recognize that obtaining representations from us concerning the information contained in this letter is a significant procedure in enabling you to form an opinion on whether the assertion specified in Management's Assertion is fairly stated, in all material respects. Accordingly, we make the following representations with respect to Management's Assertion, which are true to the best of our knowledge and belief.

We understand that your examination of our assertion related to S.C. certSIGN S.A.'s business practices disclosure and controls over its Certification Authority (CA) operations throughout the period February 8, 2019 to February 7, 2020 was made for the purpose of expressing an opinion on whether our assertion is fairly presented, in all material respects, and that your opinion is based on criteria for effective controls as stated in our assertion letter.

Accordingly, we make the following representations, which are true to the best of our knowledge and belief:

***Management's responsibilities***

We acknowledge that we are responsible for Management's Assertion, selecting the Criteria stated in that assertion, and determining that the Criteria are appropriate for our purposes. We reaffirm Management's Assertion a copy of which is attached hereto.

We acknowledge that we are responsible for and have evaluated the suitability of the design and operating effectiveness of the controls over our CA operations at Bvl. Tudor Vladimirescu, nr. 29 A, AFI Tech Park 1, Sector 5, Bucharest, Romania, CP 050881, including CA business practices disclosure, service integrity (including key and certificate life cycle management controls) and CA environmental controls. All relevant matters have been considered and reflected in our evaluation.

We have performed an assessment and believe that S.C. certSIGN S.A.'s CA business practices disclosure, service integrity (including key and certificate life cycle management controls), and CA environmental controls met the minimum requirement of the criteria described in our assertion letter throughout the period from February 8, 2019 to February 7, 2020.

We believe the stated criteria against which our assertion has been assessed are reasonable and appropriate.

We have disclosed to you that there are no significant deficiencies or material weaknesses in the design or operation of the controls which could adversely affect S.C. certSIGN S.A.'s ability to

comply with the control criteria related to S.C. certSIGN S.A.'s CA business practices disclosure, service integrity (including key and certificate life cycle management controls) and CA environmental controls, consistent with the assertions of management.

We have provided to you all relevant information and access to: (1) all information, such as records and documentation, including service level agreements, of which we are aware and that are relevant to Management's Assertion and the suitability of design and operating effectiveness of the Controls; (2) additional information that you have requested; and (3) unrestricted access to personnel within S.C. certSIGN S.A. from whom you determined it necessary to obtain evidence.

We have responded fully to all inquiries made to us by you during the engagement.

### ***Design and operation of controls***

There has been no actual, suspected, or alleged fraud or noncompliance with laws or regulations affecting the System or Controls involving (a) management, (b) employees who have significant roles in the Company's processes and procedures relating to the System or Controls in conformity with the Criteria specified above or (c) others that could have a material effect on measurements or presentation of the System or Controls.

We have disclosed to you any of the following

- Instances in which Controls were not suitably designed and implemented
- Instances in which Controls did not operate effectively or as described, after giving consideration to expected rates of deviation
- Changes in the Controls that are likely to be relevant to user entities through the date of this letter
- Any other known matters contradicting the fairness Management's Assertion or the suitability of the design or operating effectiveness of the controls to achieve the applicable trust services criteria
- Instances of non-compliance with laws and regulations, or uncorrected misstatements attributable to the Company, management or employees that may affect one or more user entities
- Communications from regulatory agencies, user entities, or others affecting the System or Controls, from February 8, 2019 through the date of this letter

### ***Independence***

We are not aware of any capital lease, material cooperative arrangement or other business relationship between the Company and Ernst & Young SRL or any other member firm of the global Ernst & Young organization (any of which, an "EY Firm").

No known events or factors subsequent to the period (or point of time) of the assertion being reported on have occurred or are pending that would have a material effect on our assertion.

We are not aware of any reason that Ernst & Young SRL would not be considered to be independent.

In management's opinion, S.C. certSIGN S.A., in providing its CA services at Bvl. Tudor Vladimirescu, nr. 29 A, AFI Tech Park 1, Sector 5, Bucharest, Romania, CP 050881, S.C. certSIGN S.A., throughout the period February 8, 2019 to February 7, 2020.

- disclosed its key and certificate life cycle management business practices and provided such services in accordance with its disclosed practices
- maintained effective controls to provide reasonable assurance that:
  - subscriber information was properly authenticated (for the registration activities performed by S.C. certSIGN S.A. 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 authorized 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 authorized and performed to maintain CA systems integrity

for the certSIGN ROOT CA, certSIGN CA Class 2 G2, certSIGN Qualified CA Class 3 G2, certSIGN Enterprise CA Class 3 G2, certSIGN Code Signing CA Class 3 G2, certSIGN SSL DV CA Class 3 G2, certSIGN SSL EV CA Class 3 G2, certSIGN Non-Repudiation CA Class 4 G2, CERTSIGN FOR BANKING SIMPLE SSL PRODUCTION CA V3, CERTSIGN FOR BANKING SIMPLE SSL TEST CA V3, CERTSIGN FOR BANKING QUALIFIED DS PRODUCTION CA V3, CERTSIGN FOR BANKING QUALIFIED DS TEST CA V3, based on the AICPA/CICA *Trust Services Criteria for Certification Authorities*, including the following:

### **CA Business Practices Disclosure**

CA Business Practices Management  
Certification Practice Statement Management  
Certificate Policy Management  
CP and CPS Consistency

### **Service Integrity**

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  
CA Key Escrow (if applicable)

Subscriber Key Life Cycle Management Controls  
Requirements for Subscriber Key Management

Certificate Life Cycle Management Controls  
Subscriber Registration  
Certificate Renewal (if supported)  
Certificate Rekey  
Certificate Issuance  
Certificate Distribution  
Certificate Revocation  
Certificate Suspension (if supported)  
Certificate Validation  
Subordinate CA Certificate Life Cycle Management Controls  
Subordinate CA Certificate Life Cycle Management

**CA Environmental Controls**

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

Very truly yours,

---

Adrian FLOAREA, General Director  
S.C. certSIGN S.A.

## **Management's Assertion Regarding the Effectiveness of Its Controls Over the Certification Authority Operations Based on the WebTrust Principles and Criteria for Certification Authorities – Extended Validation SSL v1.6.8**

April 30, 2020

We, as management of S.C. certSIGN S.A., are responsible for operating a Certification Authority (CA) at Bvl. Tudor Vladimirescu, nr. 29 A, AFI Tech Park 1, Sector 5, Bucharest, Romania, CP 050881, Romania for the Root CA and Subordinate CAs in scope for Extended Validation SSL listed at Appendix A.

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 S.C. certSIGN S.A.'s CA operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

Management of S.C. certSIGN S.A. has assessed the disclosures of its certificate practices and controls over its Extended Validation SSL CA services. Based on that assessment, in providing its Extended Validation SSL Certification Authority (CA) services at Bvl. Tudor Vladimirescu, nr. 29 A, AFI Tech Park 1, Sector 5, Bucharest, Romania, CP 050881, Romania throughout the period from February 08, 2019 through February 07, 2020, S.C. certSIGN S.A. has:

- Disclosed its Extended Validation SSL certificate lifecycle management business practices in its:
  - S.C. certSIGN S.A. - CA's Certification Practice Statement (Appendix B No.2);
  - and
  - S.C. certSIGN S.A. - Certificate Policy (Appendix B No.1),including its commitment to provide SSL certificates in conformity with the CA/Browser Forum Requirements on the S.C. certSIGN S.A. website, 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 was established and protected throughout their lifecycles; and
  - SSL subscriber information was properly authenticated (for the registration activities performed by S.C. certSIGN S.A.)
- 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 are properly authorized and performed to maintain CA systems integrity
- Maintained effective controls to provide reasonable assurance that it meets the Extended Validation SSL requirements as set forth by the CA/Browser Forum

for the Root CAs and Subordinate CAs in scope for Extended Validation SSL requirements at Appendix A, based on the *WebTrust Principles and Criteria for Certification Authorities – Extended Validation SSL v1.6.8*

Adrian FLOAREA, General Director  
S.C. certSIGN S.A.

## Appendix A

Root/Subordinate Name	Subject Key Identifier	Certificate Serial Number	SHA 256 fingerprint
C=RO, O=certSIGN, OU=certSIGN ROOT CA	E0:8C:9B:DB:25:49:B3:F 1:7C:86:D6:B2:42:87:0B: D0:6B:A0:D9:E4	35210227249154 (0x200605167002)	<a href="#">EAA962C4FA4A6BAFEBE415 196D351CCD888D4F53F3FA 8AE6D7C466A94E6042BB</a>
C=RO, O=certSIGN, OU=certSIGN SSL EV CA Class 3 G2, CN=certSIGN SSL EV CA Class 3 G2	36:3B:A2:9E:25:87:2A:0F :FD:9A:4A:3C:27:DA:CB: A7:79:C3:0C:7F	20:06:05:16:70:03:18:57 :92:60:1a:cb:75:e1:27	<a href="#">7826DE1BE414E454CFCAE0 D17B17FF0CAD12EE68CF48 7F357B38499E274B0171</a>

## Appendix B

No.	The list of audited certificate practices and procedures	Document Links
1.	<b>Certification Policy certSIGN</b> Version 1.7 Date: 31 January, 2019	<a href="https://www.certsign.ro/media/document/bXBCT2FNWUR4b0ZrcDNjY09qYmRhdz09/original/CP_certSIGN_Law_v1.7_January_2019_rev_.pdf">https://www.certsign.ro/media/document/bXBCT2FNWUR4b0ZrcDNjY09qYmRhdz09/original/CP_certSIGN_Law_v1.7_January_2019_rev_.pdf</a>
2.	<b>Certification Practice Statement certSIGN SSL EV CA Class 3 for SSL EV Certificates</b> Version 1.4 Date: 31 January, 2019	<a href="https://www.certsign.ro/media/document/OXNkbFhldVYy9yWHV4YkFSUytsZz09/original/CPS_EV-v_1.4_Law_January_rev&amp;underscore_.pdf">https://www.certsign.ro/media/document/OXNkbFhldVYy9yWHV4YkFSUytsZz09/original/CPS_EV-v_1.4_Law_January_rev&amp;underscore_.pdf</a>