

REPORT OF THE INDEPENDENT ACCOUNTANT

To the management of Internet Security Research Group (“Let’s Encrypt”):

Scope

We have examined the assertions by the management of [Let’s Encrypt](#) and [IdenTrust Services, LLC](#) (“IdenTrust”), an independent subservice organization that provides Certification Authority (“CA”) data center services to Let’s Encrypt, that for its CA operations in Utah and Colorado, in the United States of America, for its CAs enumerated in [Attachment B](#), Let’s Encrypt and IdenTrust have:

- disclosed Let’s Encrypt’s business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in the applicable versions of its ISRG Combined Certificate Policy and Certification Practice Statement (“CP/CPS”), as enumerated in [Attachment A](#)
- maintained effective controls to provide reasonable assurance that Let’s Encrypt provides its services in accordance with its CP/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 of September 1, 2024 to August 31, 2025 based on the [WebTrust Principles and Criteria for Certification Authorities, v2.2.2](#) for the relevant systems and processes used in the issuance of all certificates that assert policy object identifier 2.23.140.1.2.1.

Let’s Encrypt does not archive its CA keys, escrow its CA keys, does not provide subscriber key generation services, subscriber key storage and recovery services, integrated circuit card lifecycle management services and certificate suspension services. Accordingly, our examination did not extend to controls that would address those criteria.

Let’s Encrypt uses IdenTrust (subservice organization) to provide supplemental controls to the CA Environment to address criteria related to Asset Classification and Management, Physical and Environmental Security, Disaster Recovery, Backups, and Business Continuity Management, Monitoring and Compliance and Audit Logging for the Intermediate CAs enumerated in [Attachment B](#). The controls designed by Let’s Encrypt and operated by IdenTrust are necessary, in combination



with controls at Let's Encrypt, for Let's Encrypt to achieve the applicable WebTrust Criteria as set out in Let's Encrypt's assertion.

Certification Authority's Responsibilities

Let's Encrypt's 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, v2.2.2](#).

Subservice Organization's Responsibilities

IdenTrust has provided an accompanying assertion titled "IdenTrust Services, LLC Management's Assertion" (IdenTrust assertion) about the services provided to Let's Encrypt. IdenTrust Management is responsible for its assertion and providing services in accordance with the described practices of Let's Encrypt; and implementing, operating and documenting controls designed in accordance with Let's Encrypt's requirements, which enable Let's Encrypt to achieve the applicable WebTrust Criteria as set out in Let's Encrypt's assertion.

Independent Accountant's responsibilities

Our responsibility is to express an opinion on management's assertion based on our examination. 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.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

The relative effectiveness and significance of specific controls at Let's Encrypt 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

There are inherent limitations in the effectiveness of any system of internal control, including the possibility of human error and the circumvention of controls. For example, because of their nature, controls may not prevent, or detect unauthorised access to systems and information, or failure to comply with internal and external policies or requirements. Also, the projection to the future of any conclusions based on our findings is subject to the risk that controls may become ineffective.



Independent Accountant's Opinion

In our opinion, Let's Encrypt's and IdenTrust's management assertions, as referred to above, are fairly stated, in all material respects.

This report does not include any representation as to the quality of Let's Encrypt's or IdenTrust's services other than its CA operations at Utah and Colorado, in the United States of America, nor the suitability of any of Let's Encrypt's or IdenTrust's services for any customer's intended purpose.

Other Matter

Without modifying our opinion, we noted the following other matters during our procedures:

Matter Topic		Matter Description
1	Systems Development, Maintenance, and Change Management	Let's Encrypt disclosed in Mozilla Bug #1972745 that it deployed code it had developed for its CA software without it going through its review process.
2	Certificate Content	Let's Encrypt disclosed in Mozilla Bug #1921573 that it issued 443,453 certificates with a subject distinguished name not in compliance with its CP/CPS.
3	Certificate Status Validation	Let's Encrypt disclosed in Mozilla Bug #1954861 that two (2) revocation entries on CRLs were removed before the certificates had expired.

While the Let's Encrypt assertion notes all issues disclosed on Bugzilla from September 1, 2024 through the date of this report, we have only noted those instances relevant to the CAs enumerated in [Attachment B](#) and applicable to the [WebTrust Principles and Criteria for Certification Authorities, v2.2.2](#).

Use of the WebTrust seal

Let's Encrypt's 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, P.C.

November 17, 2025



**ATTACHMENT A - CERTIFICATION PRACTICE STATEMENT AND CERTIFICATE
POLICY VERSIONS IN-SCOPE**

Policy Name	Version	Effective Date
<u>ISRG Combined Certificate Policy and Certification Practice Statement</u>	5.9	August 29, 2025
<u>ISRG Combined Certificate Policy and Certification Practice Statement</u>	5.8	July 30, 2025
<u>ISRG Combined Certificate Policy and Certification Practice Statement</u>	5.7	January 15, 2025
<u>ISRG Combined Certificate Policy and Certification Practice Statement</u>	5.6	December 12, 2024
<u>ISRG Combined Certificate Policy and Certification Practice Statement</u>	5.5	October 25, 2024
<u>ISRG Combined Certificate Policy and Certification Practice Statement</u>	5.4	September 27, 2024
<u>ISRG Combined Certificate Policy and Certification Practice Statement</u>	5.3	March 22, 2024



ATTACHMENT B - IN-SCOPE CAs

Root CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN=ISRG Root X1 O=Internet Security Research Group C=US	96BCEC06264976F37460779ACF28C5A7CFE8A3C0AAE11A8FFCEE05C0BDDF08C6	6/4/2015	6/4/2035
CN=ISRG Root X2 O=Internet Security Research Group C=US	8B05B68CC659E5ED0FCB38F2C942FBFD200E6F2FF9F85D63C6994EF5E0B02701	9/4/2020	9/15/2025
CN=ISRG Root X2 O=Internet Security Research Group C=US	69729B8E15A86EFC177A57AFB7171DFC64ADD28C2FCA8CF1507E34453CCB1470	9/4/2020	9/17/2040
CN=ISRG Root X1 O=Internet Security Research Group C=US	6D99FB265EB1C5B3744765FCBC648F3CD8E1BFFAFDC4C2F99B9D47CF7FF1C24F	1/20/2021	9/30/2024



Subordinate CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN=E1 O=Let's Encrypt C=US	46494E30379059DF18BE52124305E606FC59070E5B21076CE113954B60517CDA	9/4/2020	9/15/2025
CN=E2 O=Let's Encrypt C=US	BACDE0463053CE1D62F8BE74370BBAE79D4FCAF19FC07643AEF195E6A59BD578	9/4/2020	9/15/2025
CN=R3 O=Let's Encrypt C=US	67ADD1166B020AE61B8F5FC96813C04C2AA589960796865572A3C7E737613DFD	9/4/2020	9/15/2025
CN=R4 O=Let's Encrypt C=US	1A07529A8B3F01D231DFAD2ABDF71899200BB65CD7E03C59FA82272533355B74	9/4/2020	9/15/2025
CN=E5 O=Let's Encrypt C=US	5DFDB3CF31B26F23D87C09F3A0CEF642F64069A9FB7CFE29270BB5DC0F1E16BB	3/13/2024	3/12/2027
CN=E5 O=Let's Encrypt C=US	E788D14B0436B5120BBEE3F15C15BADF08C1407FE72568A4F16F9151C380E1E3	3/13/2024	3/12/2027
CN=E6 O=Let's Encrypt C=US	76E9E288A AFC0E37F4390CBF946AAD997D5C1C901B3CE513D3D8FADBAE2AB85	3/13/2024	3/12/2027
CN=E6 O=Let's Encrypt C=US	065AB7D2A050F947587121765D8D070C0E1330D5798FAA42C2072749ED293762	3/13/2024	3/12/2027
CN=E7 O=Let's Encrypt C=US	AEB1FD7410E83BC96F5DA3C6A7C2C1BB836D1FA5CB86E708515890E428A8770B	3/13/2024	3/12/2027
CN=E7 O=Let's Encrypt C=US	54715420224C5B65BEED018DC3940D7338C577E322D5488F633D8C6A8FED61B2	3/13/2024	3/12/2027
CN=E8 O=Let's Encrypt C=US	83624FD338C8D9B023C18A67CB7A9C0519DA43D11775B4C6CBDAD45C3D997C52	3/13/2024	3/12/2027
CN=E8 O=Let's Encrypt C=US	AC1274542267F17B525535B5563BF731FEBB182533B46A82DC869CB64EB528C0	3/13/2024	3/12/2027
CN=E9 O=Let's Encrypt C=US	FDE88F2D4F8913D3DC1664D5F8DE51E07FE2ABFED93B45ACAD5A29BFEBAA23FB	3/13/2024	3/12/2027
CN=E9 O=Let's Encrypt C=US	4185DF97806C2BA76F1D79823F112FFA639A49CCDC990908102067AB6412B886	3/13/2024	3/12/2027
CN=R10 O=Let's Encrypt C=US	9D7C3F1AA6AD2B2EC0D5CF1E246F8D9AE6CBC9FD0755AD37BB974B1F2FB603F3	3/13/2024	3/12/2027



Subordinate CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN=R11 O=Let's Encrypt C=US	591E9CE6C863D3A079E9FABE1478C7339A26B21269DDE795211361024AE31A44	3/13/2024	3/12/2027
CN=R12 O=Let's Encrypt C=US	131FCE7784016899A5A00203A9EFC80F18EBBD75580717EDC1553580930836EC	3/13/2024	3/12/2027
CN=R13 O=Let's Encrypt C=US	D3B128216A843F8EF1321501F5DF52A5DF52939EE2C19297712CD3DE4D419354	3/13/2024	3/12/2027
CN=R14 O=Let's Encrypt C=US	24D45AA9B8D6053D281F3842C8CC0C6C1AF7CCDFD42DD5C12F6A74FA9323F7A2	3/13/2024	3/12/2027



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11/17/2025

INTERNET SECURITY RESEARCH GROUP MANAGEMENT'S ASSERTION

Internet Security Research Group ("Let's Encrypt") operates the CA services for the root and subordinate 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 certification and cross-certification

Let's Encrypt uses IdenTrust Services, LLC ("IdenTrust"), an independent subservice organization, to provide Certification Authority ("CA") data center services to Let's Encrypt.

The management of Let's Encrypt is responsible for establishing and maintaining 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, subscriber key lifecycle management controls and certificate lifecycle management controls. These controls contain monitoring mechanisms, and actions are taken to correct deficiencies identified.

Let's Encrypt uses IdenTrust (subservice organization) to provide supplemental controls to the CA Environment to address criteria related to Asset Classification and Management, Physical and Environmental Security, Disaster Recovery, Backups, and Business Continuity Management, Monitoring and Compliance and Audit Logging for the Intermediate CAs enumerated in [Attachment B](#). The controls designed by Let's Encrypt and operated by IdenTrust are necessary, in combination with controls at Let's Encrypt, for Let's Encrypt to achieve the applicable WebTrust Criteria as set out in Let's Encrypt's assertion.

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 Let's Encrypt's CA operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

Let's Encrypt's management has assessed its disclosures of its certificate practices and controls over its CA services. Based on that assessment, in Let's Encrypt's management's opinion, in providing its CA services in Utah and Colorado, in the United States of America, Let's Encrypt has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environment control practices in the applicable versions of its ISRG Combined Certificate Policy and Certification Practice Statement ("CP/CPS"), as enumerated in [Attachment A](#)



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- maintained effective controls to provide reasonable assurance that it provides its services in accordance with its CP/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
- 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 of September 1, 2024 to August 31, 2025 based on the [WebTrust Principles and Criteria for Certification Authorities, v2.2.2](#), including the following:

CA Business Practices Disclosure

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

CA Business Practices Management

- CPS Management
- CP Management

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



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- CA Public Key Distribution
- CA Key Usage
- CA Key Destruction
- CA Key Compromise
- CA Cryptographic Hardware Lifecycle Management
- CA Key Transportation
- CA Key Migration

Subscriber Key Lifecycle Management Controls

- Requirements for Subscriber Key Management

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 Controls

Let's Encrypt does not archive its CA keys, escrow its CA keys, does not provide subscriber key generation services, subscriber key storage and recovery services, integrated circuit card lifecycle management services and certificate suspension services. Accordingly, our assertion does not extend to controls that would address those criteria.

Let's Encrypt has disclosed the following matters publicly on Mozilla's Bugzilla platform. These matters were included below due to being open during the period September 1, 2024 through the date of this report.



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Bug ID	Summary	Opened	Closed	Resolution
#1921573	Let's Encrypt: No Meaningful Subject Distinguished Name	9/27/2024	11/6/2024	FIXED
#1954861	Let's Encrypt: Early CRL Removal Incident	3/18/2025	4/9/2025	FIXED
#1955721	Let's Encrypt: Failure to Document Analysis of Detected Vulnerabilities	3/21/2025	6/10/2025	FIXED
#1966515	Let's Encrypt: Issuance for Invalid Internationalized Domain Name	5/14/2025	6/4/2025	INVALID
#1972745	Let's Encrypt: Deployed Unreviewed Boulder Code	6/17/2025	7/30/2025	FIXED

DocuSigned by:

Josh Aas

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Josh Aas

Executive Director

11/19/2025



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ATTACHMENT A - CERTIFICATION PRACTICE STATEMENT AND CERTIFICATE POLICY VERSIONS IN-SCOPE

Policy Name	Version	Effective Date
ISRG Combined Certificate Policy and Certification Practice Statement	5.9	August 29, 2025
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ISRG Combined Certificate Policy and Certification Practice Statement	5.5	October 25, 2024
ISRG Combined Certificate Policy and Certification Practice Statement	5.4	September 27, 2024
ISRG Combined Certificate Policy and Certification Practice Statement	5.3	March 22, 2024



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ATTACHMENT B - IN-SCOPE CAs

Root CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN=ISRG Root X1 O=Internet Security Research Group C=US	96BCEC06264976F37460779ACF28C5A7CFE8A3C0AAE11A8FFCEE05C0BDDF08C6	6/4/2015	6/4/2035
CN=ISRG Root X2 O=Internet Security Research Group C=US	8B05B68CC659E5ED0FCB38F2C942FBFD200E6F2FF9F85D63C6994EF5E0B02701	9/4/2020	9/15/2025
CN=ISRG Root X2 O=Internet Security Research Group C=US	69729B8E15A86EFC177A57AFB7171DFC64ADD28C2FCA8CF1507E34453CCB1470	9/4/2020	9/17/2040
CN=ISRG Root X1 O=Internet Security Research Group C=US	6D99FB265EB1C5B3744765FCBC648F3CD8E1BFFAFDC4C2F99B9D47CF7FF1C24F	1/20/2021	9/30/2024



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Subordinate CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN=E1 O=Let's Encrypt C=US	46494E30379059DF18BE52124305E606FC59070E5B21076CE113954B60517CDA	9/4/2020	9/15/2025
CN=E2 O=Let's Encrypt C=US	BACDE0463053CE1D62F8BE74370BBAE79D4FCAF19FC07643AEF195E6A59BD578	9/4/2020	9/15/2025
CN=R3 O=Let's Encrypt C=US	67ADD1166B020AE61B8F5FC96813C04C2AA589960796865572A3C7E737613DFD	9/4/2020	9/15/2025
CN=R4 O=Let's Encrypt C=US	1A07529A8B3F01D231DFAD2ABDF71899200BB65CD7E03C59FA82272533355B74	9/4/2020	9/15/2025
CN=E5 O=Let's Encrypt C=US	5DFDB3CF31B26F23D87C09F3A0CEF642F64069A9FB7CFE29270BB5DC0F1E16BB	3/13/2024	3/12/2027
CN=E5 O=Let's Encrypt C=US	E788D14B0436B5120BBEE3F15C15BADF08C1407FE72568A4F16F9151C380E1E3	3/13/2024	3/12/2027
CN=E6 O=Let's Encrypt C=US	76E9E288AAFC0E37F4390CBF946AAD997D5C1C901B3CE513D3D8FADBAE2AB85	3/13/2024	3/12/2027
CN=E6 O=Let's Encrypt C=US	065AB7D2A050F947587121765D8D070C0E1330D5798FAA42C2072749ED293762	3/13/2024	3/12/2027
CN=E7 O=Let's Encrypt C=US	AEB1FD7410E83BC96F5DA3C6A7C2C1BB836D1FA5CB86E708515890E428A8770B	3/13/2024	3/12/2027
CN=E7 O=Let's Encrypt C=US	54715420224C5B65BEED018DC3940D7338C577E322D5488F633D8C6A8FED61B2	3/13/2024	3/12/2027
CN=E8 O=Let's Encrypt C=US	83624FD338C8D9B023C18A67CB7A9C0519DA43D11775B4C6CBDAD45C3D997C52	3/13/2024	3/12/2027
CN=E8 O=Let's Encrypt C=US	AC1274542267F17B525535B5563BF731FEBB182533B46A82DC869CB64EB528C0	3/13/2024	3/12/2027
CN=E9 O=Let's Encrypt C=US	FDE88F2D4F8913D3DC1664D5F8DE51E07FE2ABFED93B45ACAD5A29BFEBAA23FB	3/13/2024	3/12/2027



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Subordinate CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN=E9 O=Let's Encrypt C=US	4185DF97806C2BA76F1D79823F112FFA639A49CCDC990908102067AB6412B886	3/13/2024	3/12/2027
CN=R10 O=Let's Encrypt C=US	9D7C3F1AA6AD2B2EC0D5CF1E246F8D9AE6CBC9FD0755AD37BB974B1F2FB603F3	3/13/2024	3/12/2027
CN=R11 O=Let's Encrypt C=US	591E9CE6C863D3A079E9FABE1478C7339A26B21269DDE795211361024AE31A44	3/13/2024	3/12/2027
CN=R12 O=Let's Encrypt C=US	131FCE7784016899A5A00203A9EFC80F18EBBD75580717EDC1553580930836EC	3/13/2024	3/12/2027
CN=R13 O=Let's Encrypt C=US	D3B128216A843F8EF1321501F5DF52A5DF52939EE2C19297712CD3DE4D419354	3/13/2024	3/12/2027
CN=R14 O=Let's Encrypt C=US	24D45AA9B8D6053D281F3842C8CC0C6C1AF7CCDFD42DD5C12F6A74FA9323F7A2	3/13/2024	3/12/2027



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11/17/2025

IDENTRUST SERVICES, LLC MANAGEMENT'S ASSERTION

IdenTrust Services, LLC ("IdenTrust") provides Certification Authority ("CA") data center services to Internet Security Research Group ("Let's Encrypt"), who operates the CA services for the CAs enumerated in [Attachment B](#).

The management of IdenTrust is responsible for establishing controls over its operations, to support Let's Encrypt's CA business practices disclosures on Let's Encrypt's [repository](#), applicable CA environmental controls, and CA key 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 IdenTrust's services. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

IdenTrust's management has assessed Let's Encrypt's disclosure of its certificate practices and IdenTrust's controls to provide its CA data center services to Let's Encrypt. Based on that assessment, in IdenTrust management's opinion, in providing its PKI services at Utah and Colorado, in the United States of America, IdenTrust has maintained effective controls to provide reasonable assurance that:

- physical access to CA systems and data is restricted to authorized individuals; and
- CA systems maintenance and operations are properly authorized and performed to maintain CA systems integrity

throughout the period September 1, 2024 to August 31, 2025 based on the [WebTrust Principles and Criteria for Certification Authorities v2.2.2](#), including the following:

CA Environmental Controls

- Asset Classification and Management
- Physical and Environmental Security
- Disaster Recovery, Backups, and Business Continuity Management
- Monitoring and Compliance
- Audit Logging



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IdenTrust services include controls to support the physical and environmental security for CA operations systems. These controls include the relevant logging and monitoring controls related to physical and environmental controls provided by IdenTrust. The controls provided by IdenTrust support some elements of criteria include in the [WebTrust Principles and Criteria for Certification Authorities v2.2.2](#), however, IdenTrust is not responsible for the entirety of the controls to address any single criterion.

IdenTrust Services, LLC

Signed by:

Don Johnson

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Don Johnson

Chief Information Officer

11/18/2025