

CERTAINLY LLC

WEBTRUST FOR CERTIFICATION AUTHORITIES
TLS BASELINE REPORT

JULY 1, 2025 TO JUNE 30, 2026

Attestation and Compliance Services



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SECTION I

INDEPENDENT ACCOUNTANT'S REPORT

REPORT OF THE INDEPENDENT ACCOUNTANT

To the Management of Certainly LLC ("Certainly"):

Scope

We have examined Certainly's management assertion, that for its Certification Authority ("CA") operations for its locations and CA certificates as enumerated in Attachment A, Certainly has:

- disclosed its TLS certificate lifecycle management business practices in its
    - Certainly CA Certificate Policy (CP) and Certification Practice Statement (CPS) v1.9, dated March 1, 2025
    - Certainly CA Certificate Policy (CP) and Certification Practice Statement (CPS) v2.0, dated November 21, 2025; and
    - Certainly CA Certificate Policy (CP) and Certification Practice Statement (CPS) v2.1, dated May 15, 2026

  including its commitment to provide TLS certificates in conformity with the CA/Browser Forum Requirements on the Certainly website, and provided such services in accordance with its disclosed practices
- maintained effective controls to provide reasonable assurance that:
    - the integrity of keys and TLS certificates it manages is established and protected throughout their lifecycles; and
    - TLS subscriber information is properly authenticated (for the registration activities performed by Certainly)
- 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 July 1, 2025 to June 30, 2026, based on the WebTrust Principles and Criteria for Certification Authorities – TLS Baseline v2.9.

The CA/Browser Forum Baseline Requirements for the Issuance and Management of Publicly-Trusted TLS Server Certificates require the CA to operate controls to adhere to the Network and Certificate System Security Requirements. The WebTrust Principles and Criteria for Certification Authorities - Network Security address this requirement and are reported on in a separate report.

Certification Authority's Responsibilities

Certainly'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 – TLS Baseline v2.9.

Practitioner's Responsibilities

Our responsibility is to express an opinion on Certainly 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 and in accordance with International Standard on Assurance Engagements 3000, Assurance Engagements Other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board. 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 the Code of Professional Conduct established by the AICPA and the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants.

We applied the Statement on Quality Management Standards established by the AICPA and the International Standard on Quality Management established by the International Auditing and Assurance Standards Board (IAASB) and, accordingly, maintain a comprehensive system of quality management including documented policies and procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

The relative effectiveness and significance of specific controls at Certainly 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.

Opinion

In our opinion, management's assertion, as referred to above, is fairly stated, in all material respects.

This report does not include any representation as to the quality of Certainly's services other than its Certification Authority operations at its locations as enumerated in Attachment A, nor the suitability of any of Certainly's services for any customer's intended purpose.

Other Matters

We monitor sources of public disclosure, including Mozilla's Bugzilla and Wiki, for issues related to Certainly, and we have considered publicly disclosed and practitioner-identified issues of certificate mis-issuance or non-compliance in our procedures and conclusions. For the matters noted below, we performed procedures to determine whether the facts and circumstances surrounding each issue were properly disclosed in the bug filed by the CA with Mozilla.

Without modifying our opinion, we noted the following other matters during our procedures and have considered the nature of these matters in our risk assessment and in determining the nature, timing, and extent of our procedures. This included performing procedures to understand the root cause disclosed by the CA, and if facts and circumstances noted in our examination agreed with what has been disclosed, and to review supporting evidence of the CA's remediation activities. We have also considered the procedures the CA has designed and noted if implemented properly and operated effectively, the controls would address the root cause. We did not test the operating effectiveness of these remediated controls and express no opinion thereon. We did not perform any procedures subsequent to this report as to the effectiveness of the controls implemented.

#	Matter Topic	Matter Description
1	Missing Audit Log Entries for Certificates Issued During Capacity Testing	Bugzilla #2052085**:** Certainly identified that 5,868 certificates issued during planned capacity-characterization testing conducted April 1, 2026 to April 2, 2026 were missing one or more required audit log entries. Of the affected certificates, 5,867 were issued to a dedicated non-production test domain used for load testing and one was a subscriber issuance. All affected certificates carried a 30-day validity period and had expired prior to identification of the condition. The capacity testing deliberately drove the issuance rate to 280–360 certificates per second, significantly above normal production volume, to assess infrastructure capacity limits. At that throughput, non-blocking transports within the audit log forwarding pipeline discarded events silently, without returning a write error to the CA application and without producing a monitored signal. No certificate mis-issuance occurred, and issuance, revocation, OCSP, and CRL services remained unaffected during the timeframe of the incident. In response, Certainly replaced the non-blocking log transport with a backpressure-applying stream so issuance stalls rather than drops events under load; built an independent, record-level reconciliation service that compares expected audit events against stored logs; instrumented forwarding-failure and queue-discard counters previously unmonitored; and added an audit log throughput validation step to the load-testing runbook.
2	Expired Certificates on “Valid” and “Revoked” Test Websites	Bugzilla #2052399**:** TLS certificates on Certainly’s “valid” and “revoked” test websites expired on June 8, 2026 and were not renewed for 23 days, through July 2, 2026. The cause was an unpinned upstream ACME client dependency that silently broke certificate renewal, compounded by a monitoring misconfiguration that suppressed the relevant expiry alert and a resilience/fallback mechanism that kept the sites available, together masking the failure from detection until the CA identified it during a routine monthly review. The corresponding "expired" test sites continued to operate as intended throughout. No certificate mis-issuance occurred, and certificate issuance, revocation, OCSP, and CRL services for subscriber certificates were unaffected. In response, Certainly’s remediation activities included pinning upstream dependency to specific major versions, monitoring validation settings on “valid” site monitors, auditing of all external monitoring configurations, migrating to an internal configuration-as-code monitoring tool, and adding pre-expiry alerting for certificates on the test sites.

These matters were disclosed publicly subsequent to the end of the examination period. Our procedures with respect to these matters were performed during the course of our engagement through the date of this report.

Use of the WebTrust seal

Certainly's use of the WebTrust for Certification Authorities – TLS Baseline 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.

Schellman & Company, LLC

Schellman & Company, LLC
Tampa, Florida, United States of America
August 10, 2026

SECTION 2

MANAGEMENT'S ASSERTION

MANAGEMENT'S ASSERTION

Certainly LLC ("Certainly") operates the Certification Authority ("CA") services as enumerated in Attachment A and provides TLS CA services.

The management of Certainly is responsible for establishing and maintaining effective controls over its TLS CA operations, including its network and certificate security system controls, its TLS CA business practices disclosure on its website, TLS key lifecycle management controls, and TLS certificate 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 Certainly's Certification Authority operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

Certainly management has assessed its disclosures of its certificate practices and controls over its TLS CA services. Based on that assessment, in providing its TLS CA services at its locations as enumerated in Attachment A, Certainly has:

- disclosed its TLS certificate lifecycle management business practices in its:
    - Certainly CA Certificate Policy (CP) and Certification Practice Statement (CPS) v1.9, dated March 1, 2025
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  including its commitment to provide TLS certificates in conformity with the CA/Browser Forum Requirements on the Certainly website, and provided such services in accordance with its disclosed practices
- maintained effective controls to provide reasonable assurance that:
    - the integrity of keys and TLS certificates it manages is established and protected throughout their lifecycles; and
    - TLS subscriber information is properly authenticated (for the registration activities performed by Certainly)
- 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 July 1, 2025 to June 30, 2026, based on the WebTrust Principles and Criteria for Certification Authorities – TLS Baseline v2.9.

Certainly has disclosed the following matters publicly on Mozilla's Bugzilla platform. These matters were reported subsequent to the period July 1, 2025 to June 30, 2026 and remained open as of the date of this assertion.

Bug ID	Summary	Opened	Closed	Resolution
2052085	Missing Audit Log Entries for Certificates Issued During Capacity Testing	2026-07-01	Pending	Open
2052399	Expired Certificates on "Valid" and "Revoked" Test Websites	2026-07-02	Pending	Open



Marshall Erwin
Chief Information Security Officer
Certainly LLC
August 10, 2026

ATTACHMENT A

CERTAINLY'S ROOT CAS, ISSUING CAS, AND LOCATIONS IN SCOPE FOR TLS BASELINE

Certainly's Root CAs

Root CA	Subject Common Name	SHA256 Fingerprint
Certainly Root E1	Certainly Root E1	B4585F22E4AC756A4E8612A1361C5D9D031A93FD84FEBB778FA3068B0FC42DC2
Certainly Root R1	Certainly Root R1	77B82CD8644C4305F7ACC5CB156B45675004033D51C60C6202A8E0C33467D3A0

Certainly's Issuing CAs

Root CA	Subject Common Name	SHA256 Fingerprint
Certainly Intermediate E1	Certainly Intermediate E1	98DD2A75F65748F2667BC4B079177813647C17EDCC6DEE92F1F06668BE0F1A3D
Certainly Intermediate R1	Certainly Intermediate R1	575C09B07A001CA0EF6B3B1C5730BFAFEBC7AD9F56A009F1966C32F08E659713

The following certificates were signed by Starfield Technologies, LLC for Certainly

Root CA	Subject Common Name	SHA256 Fingerprint
Starfield Root Certificate Authority - G2	Certainly Intermediate E1	3379233C434610C8EAA9361ACBDD24C7D655409C6D680A8C2585FFDA27011EE7
Starfield Root Certificate Authority - G2	Certainly Intermediate R1	FEC41E32CA75C295A6240FA639D3ABE3BFB5CB131D6690E2331A176BED2E5BD2

CERTAINLY'S LOCATIONS

Location Name	Location Type	Location	In-Scope for Physical and Environmental Control Testing
Certainly Corporate Headquarters	Main Office	San Francisco, California, USA	No
Online CA Hosting 1	Data-Center 1	Santa Clara, California, USA	Yes
Online CA Hosting 2	Data-Center 2	Reston, Virginia, USA	Yes
Offline Key Storage 1	Backup/DR/Activation Materials	Santa Clara, California, USA	Yes
Offline Key Storage 2	Backup/DR/Activation Materials	Reston, Virginia, USA	Yes
MPIC Servers	Cloud Provider	Moncks Corner, South Carolina, USA	No
MPIC Servers	Cloud Provider	Council Bluffs, Iowa, USA	No
MPIC Servers	Cloud Provider	The Dalles, Oregon, USA	No
MPIC Servers	Cloud Provider	St. Ghislain, Belgium	No
MPIC Servers	Cloud Provider	Hamina, Finland	No