

## REPORT OF THE INDEPENDENT ACCOUNTANT

To the management of IdenTrust Services, LLC (“IdenTrust”):

### Scope

We have examined IdenTrust management’s [assertion](#) that for its Certification Authority (“CA”) operations in Salt Lake City, Utah and Centennial, Colorado, for its CAs as enumerated in [Attachment B](#), IdenTrust has:

- disclosed its SSL certificate lifecycle management business practices in the applicable versions of IdenTrust’s TrustID Certificate Policy (“CP”) and TrustID Certification Practice Statement (“CPS”) as enumerated in [Attachment A](#), including its commitment to provide SSL certificates in conformity with the CA/Browser Forum Requirements on its [repository](#), 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 is established and protected throughout their lifecycles; and
  - SSL subscriber information is properly authenticated
- 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 July 1, 2024 to June 30, 2025, based on the [WebTrust Principles and Criteria for Certification Authorities - SSL Baseline, v2.8](#).

The CA/Browser Forum Baseline Requirements for the Issuance and Management of Publicly-Trusted TLS Server Certificates requires compliance with the Network and Certificate System Security Requirements (“Network Security Requirements”) as set forth by the CA/Browser Forum. The relevant principle and criteria are included as part of WebTrust Principles and Criteria for Certification Authorities - Network Security, which are reported on under separate cover.

### Certification Authority’s Responsibilities

IdenTrust’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 - SSL Baseline, v2.8](#).



### **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 IdenTrust 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 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 IdenTrust's services other than its CA operations in the locations in Salt Lake City, Utah and Centennial, Colorado, nor the suitability of any of 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	Certificate Content	IdenTrust disclosed in Mozilla Bug <a href="#">#1919162</a> that it issued seven (7) TLS Certificates with a userNotice in the certificate policy extension and Subject fields in an order not compliant with the TLS BRs.
2	Certificate Validation	IdenTrust disclosed in Mozilla Bug <a href="#">#1933353</a> that 6,450 TLS Certificates it issued had an incorrect OCSP response of "unauthorized."
3	Subscriber Registration	IdenTrust disclosed in Mozilla Bug <a href="#">#1930029</a> that it issued one (1) TLS Certificate without completion of domain validation.
4	Monitoring and Compliance	For two (2) out of two (2) quarters selected for testing, IdenTrust did not select at least three (3) percent of certificates issued as part of the quarterly self-assessment, 2.99% of the DV/OV and EV SSL scopes.

While the IdenTrust assertion notes all issues disclosed on Bugzilla from July 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 - SSL Baseline, v2.8](#).

### Use of the WebTrust seal

IdenTrust's use of the WebTrust for Certification Authorities - SSL 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.

*BDO USA, P.C.*

September 23, 2025



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

Policy Name	Version	Effective Date
<a href="#">IdenTrust TrustID Certificate Policy</a>	4.9.2	December 4, 2024
IdenTrust TrustID Certificate Policy	4.9.1	September 30, 2024
IdenTrust TrustID Certificate Policy	4.9.0	March 12, 2024

Policy Name	Version	Effective Date
<a href="#">IdenTrust TrustID Certification Practice Statement</a>	4.9.2	December 4, 2024
IdenTrust TrustID Certification Practice Statement	4.9.1	September 30, 2024
IdenTrust TrustID Certification Practice Statement	4.9.0	March 12, 2024



## ATTACHMENT B - IN-SCOPE CAs FOR TLS BASELINE REQUIREMENTS

Root CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN = IdenTrust Commercial Root CA 1 O = IdenTrust C = US	5D56499BE4D2E08BCFCAD08A3E38723D50503BDE706948E42F55603019E528AE	1/16/2014	1/16/2034
CN = IdenTrust Commercial Root TLS ECC CA 2 O = IdenTrust C = US	983D826BA9C87F653FF9E8384C5413E1D59ACF19DDC9C98CECAE5FDEA2AC229C	4/11/2024	4/11/2039
CN = IdenTrust Commercial Root TLS RSA CA 2 O = IdenTrust C = US	4C53D6746D9502530D235A82F9CF8382F5779D5DDDDBD373ABE1724FC1EFE796	12/17/2024	12/14/2039
CN = IdenTrust Public Sector Root CA 1 O = IdenTrust C = US	30D0895A9A448A262091635522D1F52010B5867ACAE12C78EF958FD4F4389F2F	1/16/2014	1/16/2034



Cross-Signed CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN = IdenTrust Commercial Root CA 1 O = IdenTrust C = US	1766FE28F034150CDB62B4469531E4D76FBF3A1EC9684CAB3767C3021AB67E50	6/4/2021	9/30/2024
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 = HydrantID Server CA O1 OU = HydrantID Trusted Certificate Service O = IdenTrust C = US	8BB2F6883FED289A521BA27C478482950874E143CACCEC6FC025990C0C46813E	12/12/2019	12/12/2029
CN = IdenTrust Public Sector Server CA 1 OU = TrustID Server O = IdenTrust C = US	288B35466FB8E228B98832019E1A7956AC3E9F154280CC97486ECC8E2C9CABC1	8/12/2020	8/12/2028
CN = TrustID ECC Server CA 1 O = IdenTrust C = US	E3C8552F6B39366B5AAEDB7608A73E3FD68D100C1309CB15718143EA8683F254	12/23/2024	6/21/2032
CN = TrustID Enterprise TLS CA 3 O = IdenTrust C = US	86A2E3105F21D5DEDE5A437CEDA47BBE2044D775F6F77F346B1D4BD03A1F5907	9/16/2024	9/16/2032
CN = TrustID RSA Server CA 2 O = IdenTrust C = US	915D668811D195CC7C9614DC3F828DF3B291B35E610ABB2E6B4493862F4DE379	1/29/2025	7/28/2032
CN = TrustID Server CA E1 OU = TrustID Server O = IdenTrust C = US	743E328F329E194DA252711BF6BFF00CF63B6A4C0AA66B2E1967716910678971	12/12/2019	12/12/2029
CN = TrustID Server CA O1 OU = TrustID Server O = IdenTrust C = US	6BAAB0C433D779FD6A4B6D56D6304D5E6EA5DE689FE35A43038A4028F345DF60	12/12/2019	12/12/2029



IdenTrust Services, LLC  
 5225 Wiley Post Way  
 Suite 450  
 Salt Lake City, Utah, 84116

9/23/2025

**IDENTRUST SERVICES, LLC MANAGEMENT’S ASSERTION**

IdenTrust Services, LLC (“IdenTrust”) operates the Certification Authority (“CA”) services for the CA certificates enumerated in [Attachment B](#) and provides SSL CA services.

IdenTrust management has assessed its disclosures of its certificate practices and controls over its SSL CA services. Based on that assessment, in providing its SSL CA services in Salt Lake City, Utah and Centennial, Colorado, IdenTrust has:

- disclosed its SSL certificate lifecycle management business practices in the applicable versions of IdenTrust’s Certificate Policy (“CP”) and Certification Practice Statements (“CPS”) as enumerated in [Attachment A](#), including its commitment to provide SSL certificates in conformity with the CA/Browser Forum Requirements in its [repository](#), 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 is established and protected throughout their lifecycles; and
  - SSL subscriber information is properly authenticated
- 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 July 1, 2024 to June 30, 2025, based on the [WebTrust Principles and Criteria for Certification Authorities - SSL Baseline, V2.8](#).


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

Bug ID	Summary	Opened	Closed	Resolution
<a href="#">#1895006</a>	IdenTrust: unintended creation of a Root CA certificate	5/3/2024	8/23/2024	FIXED
<a href="#">#1897569</a>	IdenTrust: TLS ICA with User Notice in Policy Qualifier	5/17/2024	8/23/2024	FIXED
<a href="#">#1905446</a>	IdenTrust: Unauthorized OCSP response on a Timestamp certificate	6/28/2024	11/6/2024	FIXED
<a href="#">#1910195</a>	IdenTrust: Invalid special characters in S/MIME Certificates	7/26/2024	9/6/2024	FIXED
<a href="#">#1914067</a>	IdenTrust: Expired CRLs	8/20/2024	10/23/2024	FIXED



IdenTrust Services, LLC  
5225 Wiley Post Way  
Suite 450  
Salt Lake City, Utah, 84116

Bug ID	Summary	Opened	Closed	Resolution
<a href="#">#1919162</a>	IdenTrust: TLS Certificates with outdated certificate profile	9/16/2024	11/4/2024	FIXED
<a href="#">#1930029</a>	IdenTrust: Approval of TLS certificate renewal without domain validation	11/7/2024	2/19/2025	FIXED
<a href="#">#1933353</a>	IdenTrust: Incorrect response for OCSP validation	11/25/2024	3/21/2025	FIXED

Signed by:  
  
5AEF09ABDA0A425... 9/23/2025

---

Don Johnson  
Chief Information Officer



IdenTrust Services, LLC  
 5225 Wiley Post Way  
 Suite 450  
 Salt Lake City, Utah, 84116

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

Policy Name	Version	Effective Date
<a href="#">IdenTrust TrustID Certificate Policy</a>	4.9.2	December 4, 2024
IdenTrust TrustID Certificate Policy	4.9.1	September 30, 2024
IdenTrust TrustID Certificate Policy	4.9.0	March 12, 2024

Policy Name	Version	Effective Date
<a href="#">IdenTrust TrustID Certification Practice Statement</a>	4.9.2	December 4, 2024
IdenTrust TrustID Certification Practice Statement	4.9.1	September 30, 2024
IdenTrust TrustID Certification Practice Statement	4.9.0	March 12, 2024



IdenTrust Services, LLC  
 5225 Wiley Post Way  
 Suite 450  
 Salt Lake City, Utah, 84116

### ATTACHMENT B - IN-SCOPE CAs FOR TLS BASELINE REQUIREMENTS

Root CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN = IdenTrust Commercial Root CA 1 O = IdenTrust C = US	5D56499BE4D2E08BCFCAD08A3E38723D50503BDE706948E42F55603019E528AE	1/16/2014	1/16/2034
CN = IdenTrust Commercial Root TLS ECC CA 2 O = IdenTrust C = US	983D826BA9C87F653FF9E8384C5413E1D59ACF19DDC9C98CECAE5FDEA2AC229C	4/11/2024	4/11/2039
CN = IdenTrust Commercial Root TLS RSA CA 2 O = IdenTrust C = US	4C53D6746D9502530D235A82F9CF8382F5779D5DDDDBD373ABE1724FC1EFE796	12/17/2024	12/14/2039
CN = IdenTrust Public Sector Root CA 1 O = IdenTrust C = US	30D0895A9A448A262091635522D1F52010B5867ACAE12C78EF958FD4F4389F2F	1/16/2014	1/16/2034



IdenTrust Services, LLC  
 5225 Wiley Post Way  
 Suite 450  
 Salt Lake City, Utah, 84116

Cross-Signed CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN = IdenTrust Commercial Root CA 1 O = IdenTrust C = US	1766FE28F034150CDB62B4469531E4D76FBF3A1EC9684CAB3767C3021AB67E50	6/4/2021	9/30/2024
CN = ISRG Root X1 O = Internet Security Research Group C = US	6D99FB265EB1C5B3744765FCBC648F3CD8E1BFFAFDC4C2F99B9D47CF7FF1C24F	1/20/2021	9/30/2024



IdenTrust Services, LLC  
 5225 Wiley Post Way  
 Suite 450  
 Salt Lake City, Utah, 84116

Subordinate CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN = HydrantID Server CA O1 OU = HydrantID Trusted Certificate Service O = IdenTrust C = US	8BB2F6883FED289A521BA27C478482950874E143CACCEC6FC025990C0C46813E	12/12/2019	12/12/2029
CN = IdenTrust Public Sector Server CA 1 OU = TrustID Server O = IdenTrust C = US	288B35466FB8E228B98832019E1A7956AC3E9F154280CC97486ECC8E2C9CABC1	8/12/2020	8/12/2028
CN = TrustID ECC Server CA 1 O = IdenTrust C = US	E3C8552F6B39366B5AAEDB7608A73E3FD68D100C1309CB15718143EA8683F254	12/23/2024	6/21/2032
CN = TrustID Enterprise TLS CA 3 O = IdenTrust C = US	86A2E3105F21D5DEDE5A437CEDA47BBE2044D775F6F77F346B1D4BD03A1F5907	9/16/2024	9/16/2032
CN = TrustID RSA Server CA 2 O = IdenTrust C = US	915D668811D195CC7C9614DC3F828DF3B291B35E610ABB2E6B4493862F4DE379	1/29/2025	7/28/2032
CN = TrustID Server CA E1 OU = TrustID Server O = IdenTrust C = US	743E328F329E194DA252711BF6BFF00CF63B6A4C0AA66B2E1967716910678971	12/12/2019	12/12/2029
CN = TrustID Server CA O1 OU = TrustID Server O = IdenTrust C = US	6BAAB0C433D779FD6A4B6D56D6304D5E6EA5DE689FE35A43038A4028F345DF60	12/12/2019	12/12/2029