

KPMG Inc KPMG Crescent 85 Empire Road, Parktown, 2193, Private Bag 9, Parkview, 2122, South Africa Telephone +27 (0)11 647 7111
Fax +27 (0)11 647 8000
Docex 472 Johannesburg
Internet kpmg.co.za

# **Independent Assurance Report**

To the Management of Law Trusted Third Party Services (Pty) Ltd ("LAWtrust-CA").

# Scope

We have been engaged, in a reasonable assurance engagement, to report on LAWtrust-CA <u>Management's Assertion</u> that for its Certification Authority ("CA") operations at the following locations throughout the period 1 January 2024 to 31 December 2024:

- LAWtrust Operations (Pretoria & Johannesburg, South Africa)
- LAWtrust Primary Datacenter (Johannesburg, South Africa)
- LAWtrust Back up Datacenter (Pretoria, South Africa)

for its CAs as enumerated in Appendix A, LAWtrust-CA has

- disclosed its business, key lifecycle management, certificate lifecycle management and CA environmental control practices in the applicable versions of its Certificate Policy and Certification Practice Statements as enumerated in Appendix B.
- maintained effective controls to provide reasonable assurance that:
  - LAWtrust-CA's Certification Practice Statements are consistent with its Certificate Policy
  - LAWtrust-CA provides its services in accordance with its Certificate Policy and Certification Practice Statements
- 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; and
  - subscriber information is properly authenticated (for the registration activities performed by LAWtrust-CA)
- 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

in accordance with <u>WebTrust Principles and Criteria for Certificate Authorities, Version 2.2.2</u>, and those provisions contained within Chapter 3 of the Accreditation Regulations of the Electronic Communications and Transaction Act of 2002.

KPMG Incorporated, a South African company with registration number 1999/021543/21 and a member firm of the KPMG global organisation of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee.

KPMG Incorporated is a Registered Auditor, in public practice, in terms of the Auditing Profession Act 26 of 2005.

Chairman: Prof W Nkuhlu

Chief Executive Officer: I Sehoole

Directors: Full list on website

The company's principal place of business is at KPMG Crescent, 85 Empire Road, Parktown.

Registration number 1999/021543/2



LAWtrust-CA makes use of external registration authorities for specific subscriber registration activities as disclosed in LAWtrust-CA's business practices. Our procedures did not extend to the controls exercised by these external registration authorities.

LAWtrust-CA does not provide CA key escrow services and does not provide third-Party subordinate CA or cross certificate issuance or management services. Accordingly, our procedures did not extend to controls that would address those criteria.

# Certification authority's responsibilities

LAWtrust-CA'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, Version 2.2.2, and those provisions contained within Chapter 3 of the Accreditation Regulations of the Electronic Communications and Transaction Act of 2002.

# Our independence and quality management

We have complied with the independence and other ethical requirements of the Code of Professional Conduct for Registered Auditors issued by the Independent Regulatory Board for Auditors (IRBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. The IRBA Code is consistent with the corresponding sections of the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards).

The firm applies International Standard on Quality Management (ISQM) 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements and accordingly maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

# Practitioner's responsibilities

Our responsibility is to express an opinion on Management's Assertion based on our procedures. We conducted our engagement in accordance with International Standard on Assurance Engagements 3000 (Revised), Assurance Engagements Other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board. This standard requires that we plan and perform our procedures to obtain reasonable assurance about whether, in all material respects, management's assertion is fairly stated, and, accordingly, included:

- Obtaining an understanding of LAWtrust-CA's key and certificate lifecycle management business practices and its controls over key and certificate integrity, over the authenticity and confidentiality of subscriber and relying party information, over the continuity of key and certificate lifecycle management operations and over development, maintenance and operation of systems integrity;
- 2. Selectively testing transactions executed in accordance with disclosed key and certificate lifecycle 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. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.



# Relative effectiveness of controls

The relative effectiveness and significance of specific controls at LAWtrust-CA 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.

#### 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, throughout the period 01 January 2024 to 31 December 2024, LAWtrust-CA Management's Assertion, as referred to above, is fairly stated, in all material respects, in accordance with the WebTrust Principles and Criteria for Certification Authorities v2.2.2, and those provisions contained within Chapter 3 of the Accreditation Regulations of the Electronic Communications and Transaction Act of 2002.

This report does not include any representation as to the quality of LAWtrust-CA's services beyond those covered by the WebTrust Principles and Criteria for Certification Authorities v2.2.2, and those provisions contained within Chapter 3 of the Accreditation Regulations of the Electronic Communications and Transaction Act of 2002, nor the suitability of any of LAWtrust-CA's services for any customer's intended purpose.

#### Restriction on use

This report is for the purpose of providing information to the South African Accreditation Authority

(SAAA) and Chartered Professional Accountants (CPA) Canada solely in connection with the recertification of the WebTrust seal and accreditation with SAAA and may not be suitable for any other purpose (save for the LAWtrust-CA own internal purposes).

## Use of the WebTrust seal

LAWtrust-CA'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.

Yours faithfully

—DocuSigned by:

KPMG Inc.

--- 6F3A95EAB2D5416...

KPMG Inc.

Per Devon C Duffield Chartered Accountant (SA) Registered Auditor Director 14 March 2025



# Appendix A - In Scope CAs

CA Distinguished Name	SHA1 Fingerprint
CN = LAWtrust Root Certification Authority 2048 OU = LAW Trusted Third Party Services PTY Ltd. O = LAWtrust C = ZA	335a7ff00927cf2df278e2c9192f7 a4d5534f80c
CN = LAWtrust AeSign Certification Authority 2048 OU = LAW Trusted Third Party Services PTY Ltd. O = LAWtrust C = ZA	5496dda23f9af49e1db2b39790a 0f6b948f08285

CA Distinguished Name	SHA1 Fingerprint	SHA256 Fingerprint
CN = LAWtrust AeSign CA02 OU = AeSign O = LAWtrust E = info@lawtrust.co.za L = Centurion S = Gauteng C = ZA	4171549317ba4229 9fa09bf1a9c37eddb e313262	f6d0c1d2dd35c9b2a99 44b24eaf47b4f5a061e e8e775e9e206b54a17 432b5d02
CN = LAWtrust AATL CA01 OU = organization identifier (4570229049) O = LAW Trusted Third Party Services PTY Ltd. E = info@lawtrust.co.za L = Centurion S = Gauteng C = ZA	85ce1094a13c25ed d45321329a33e4f8 46d4372b	e37872e123729faa9d8 809c7fde8c1f38c7feebf 2e9af1e5cc870c024de b7837
CN = LAWtrust2048 CA2 O = LAWtrust C = ZA	213cebf3eae015a6d a0e11dab63687814 aa0f11d	4957ded34105464113 9cbab3b96006545d09 4d449590fb08ae9a78d 05a40bd83
CN = LAWtrust Root CA2 (4096) O = LAWtrust C = ZA	eca2d530a9ab2c7d 0e7561644e0ae016 a154387d	48e1cf9e43b688a5104 4160f46d773b8277fe4 5beaad0e4df90d19743 82fea99
CN = LAWtrust AUTH CA01 O = LAWtrust C = ZA		5693c8e01ec5442677 a6c8be5a0b6079b891 d8c9e58e260c65037d 5ab2088926
CN = LAWtrust SIGNING CA01  OU = organization identifier (4570229049)  O = LAW Trusted Third Party Services PTY  Ltd.  E = info@lawtrust.co.za  L = Centurion  S = Gauteng  C = ZA	f14324f24a7e6526a e78d5e52d191ef9f0 8e5e5a	167312e4fca805270ce bc11b1710fb30871b86 0829753d20995f588de 9a5a90c



CA Distinguished Name	SHA1 Fingerprint	SHA256 Fingerprint
CN = LAWtrust Secure CA01 O = LAWtrust C = ZA		0946be0774bf32ac7b0 e2e9abe20d9f44152f4 ef19611c5fb779adc5 a9a5e2f0
CN = LAWtrust AUTH CA02 O = LAWtrust C = ZA	4e4ec5c8e9426a1 dd36d9788936a85 e75d34ab67	066febf4ad7818e8154 98dd2fb7c85d2abf46a 5278339baf163c9f7f fa23e024



# Appendix B – Certificate Policies and Certification Practice Statements in Scope

Certificate Policy	Begin Effective Date	End Effective Date
LAWtrust Certificate Policy V020	31 October 2023	31 October 2024
LAWtrust Certificate Policy V021	31 October 2024	

LAWtrust Root CA 2048 CPS	Begin Effective Date	End Effective Date
LAWtrust ROOT CA 2048 CPS V014	31 October 2023	31 October 2024
LAWtrust ROOT CA 2048 CPS V015	31 October 2024	

LAWtrust Root CA2 (4096) CPS	Begin Effective Date	End Effective Date
LAWtrust ROOT CA2 (4096) CPS V05	31 October 2023	31 October 2024
LAWtrust ROOT CA2 (4096) CPS V06	31 October 2024	

LAWtrust AATL CA01 CPS	Begin Effective Date	End Effective Date
LAWtrust AATL CA01 CPS V006	31 October 2023	31 October 2024
LAWtrust AATL CA01 CPS V007	31 October 2024	

LAWtrust Auth CA01 CPS	Begin Effective Date	End Effective Date
LAWtrust Auth CA01 CPS V007	31 October 2023	31 October 2024
LAWtrust Auth CA01 CPS V008	31 October 2024	

LAWtrust Auth CA02 CPS	Begin Effective Date	End Effective Date
LAwtrust Auth CA02 CPS V001	21 June 2023	31 October 2024
LAwtrust Auth CA02 CPS V002	31 October 2024	

LAWtrust Secure CA01 CPS	Begin Effective Date	End Effective Date
LAWtrust Secure CA01 CPS V002	31 October 2023	31 October 2024
LAWtrust Secure CA01 CPS V003	31 October 2024	

LAWtrust Signing CA01 CPS	Begin Effective Date	End Effective Date
LAWtrust Signing CA01 CPS V007	31 October 2023	31 October 2024
LAWtrust Signing CA01 CPS V008	31 October 2024	



LAWtrust AeSign CA1 CPS	Begin Effective Date	End Effective Date
LAWtrust AeSign CA1 CPS V008	31 October 2023	31 October 2024
LAWtrust AeSign CA1 CPS V009	31 October 2024	

LAWtrust AeSign CA2 CPS	Begin Effective Date	End Effective Date
LAWtrust AeSign CA2 CPS V007	31 October 2023	31 October 2024
LAWtrust AeSign CA2 CPS V008	31 October 2024	

LAWtrust2048 CA2 CPS	Begin Effective Date	End Effective Date
LAWtrust2048 CA2 CPS V009	31 October 2023	31 October 2024
LAWtrust2048 CA2 CPS V010	31 October 2024	





#### LAWTRUST-CA MANAGEMENT'S ASSERTION

LAWtrust Certificate Authority ("LAWtrust-CA") operates the Certification Authority (CA) services known and enumerated in Appendix A, and provides the following CA services:

- Subscriber registration
- Certificate Renewal
- Certificate rekey
- Certificate issuance
- Certificate distribution
- Certificate revocation
- Certificate suspension
- Certificate validation
- Subscriber key generation and management

The Management of LAWtrust-CA is responsible for establishing and maintaining effective controls over its operations, including its CA business practices disclosure [https://www.lawtrust.co.za/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.

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 LAWtrust-CA's Certification Authority operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

LAWtrust-CA's Management has assessed its disclosures of its certificate practices and controls over its CA services. Based on that assessment, in LAWtrust-CA's Management's opinion, in providing its Certification Authority (CA) services at LAWtrust operations (Pretoria & Johannesburg, South Africa), the LAWtrust Primary Datacenter (Johannesburg, South Africa) and the LAWtrust Back Up Datacenter (Pretoria, South Africa), throughout the period 1 January 2024 to 31 December 2024, LAWtrust –CA has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in the applicable versions of its Certificate Policy and Certification Practice Statements as enumerated in Appendix B.
- maintained effective controls to provide reasonable assurance that:
  - LAWtrust-CA's Certificate Practice Statements are consistent with its Certificate Policy
    - **t** +27 12 676 9240 **f** +27 12 665 3997
    - e info@lawtrust.co.za w www.lawtrust.co.za
    - a Altron Woodlands Campus, 20 Woodlands Drive, Woodmead, Johannesburg, Gauteng p Postnet Suite 412, Private Bag X111, Centurion, 0046

- LAWtrust-CA provides its services in accordance with its Certificate Policy and Certification Practice Statements
- 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; and
  - subscriber information is properly authenticated (for the registration activities performed by LAWtrust-CA);
- maintained effective controls to provide reasonable assurance that:
  - logical and physical access to CA systems and data is restricted to authorised individuals;
  - the continuity of key and certificate management operations is maintained; and
  - CA systems development, maintenance, and operations are properly authorised and performed to maintain CA systems integrity

in accordance with the <u>WebTrust Principles and Criteria for Certification Authorities v2.2.2</u>, and those provisions contained within Chapter 3 of the Accreditation Regulations of the Electronic Communications and Transaction Act of 2002, including the following:

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

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

## **CA Business Practices Management**

- Certificate Policy Management
- Certification Practice Statement Management
- CP and CPS Consistency

#### **CA Environmental Controls**

- Security Management
- Asset Classification and Management
- Personnel Security
- Physical & Environmental Security
- Operations Management
- System Access Management
- System Development, Maintenance and Change Management
- Disaster Recovery, Back up and 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

- CA Key Destruction
- CA Key Compromise
- CA Cryptographic Hardware Lifecycle Management
- CA Key Transportation
- CA Key Migration

# **Subscriber Key Lifecycle Management Controls**

- 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
- Certificate Validation

## **ECTA Chapter VI**

• Requirements for Certification Service Providers

LAWtrust-CA does not provide CA key escrow services and does not provide third-Party subordinate CA or cross certificate issuance or management services. Accordingly, our procedures did not extend to controls that would address those criteria.

Rian Schoeman Managing Executive 14 March 2025

R. Sham

# Appendix A -In Scope CAs

CA Distinguished Name	SHA1 Fingerprint
CN = LAWtrust Root Certification Authority 2048	33 5a 7f f0 09 27 cf 2d f2 78 e2 c9 19 2f 7a 4d 55 34 f8 0c
OU = LAW Trusted Third Party Services PTY Ltd. O = LAWtrust	C9 19 21 7a 4d 55 34 18 0C
C = ZA	
CN = LAWtrust AeSign Certification Authority 2048	54 96 dd a2 3f 9a f4 9e 1d b2
OU = LAW Trusted Third Party Services PTY Ltd.	b397 90 a0 f6 b9 48 f0 82 85
O = LAWtrust	
C = ZA	

CA Distinguished Name	SHA1 Fingerprint	SHA256 Fingerprint
CN = LAWtrust AeSign CA02 OU = AeSign O = LAWtrust E = info@lawtrust.co.za L = Centurion S = Gauteng C = ZA	41 71 54 9317 ba 42 29 9f a0 9b f1 a9 c3 7e dd be 31 32 62	f6 d0 c1 d2 dd 35 c9 b2 a9 94 4b 24 ea f4 7b 4f 5a 06 1e e8 e7 75 e9 e2 06 b5 4a 17 43 2b 5d 02
CN = LAWtrust AATL CA01 OU = organization identifier (4570229049) O = LAW Trusted Third Party Services PTY Ltd. E = info@lawtrust.co.za L = Centurion S = Gauteng C = ZA	85 ce 10 94 a1 3c 25 ed d4 53 21 32 9a 33 e4 f8 46 d4 37 2b	e3 78 72 e1 23 72 9f aa 9d 88 09 c7 fd e8 c1 f3 8c 7f ee bf 2e 9a f1 e5 cc 87 0c 02 4d eb 78 37
CN = LAWtrust2048 CA2 O = LAWtrust C = ZA	21 3c eb f3 ea e0 15 a6 da 0e 11 da b6 36 87 81 4a a0 f1 1d	49 57 de d3 41 05 46 41 13 9c ba b3 b9 60 06 54 5d 09 4d 44 95 90 fb 08 ae 9a 78 d0 5a 40 bd 83
CN = LAWtrust Root CA2 (4096) O = LAWtrust C = ZA	ec a2 d5 30 a9 ab 2c 7d 0e 75 61 64 4e 0a e0 16 a1 54 38 7d	48 e1 cf 9e 43 b6 88 a5 10 44 16 0f 46 d7 73 b8 27 7f e4 5b ea ad 0e 4d f9 0d 19 74 38 2f ea 99
CN = LAWtrust AUTH CA01 O = LAWtrust C = ZA	5c c1 64 d1 0b 9f d0 24 98 ca f9 5d d2 62 41 29 2a 6e 62 fe	56 93 c8 e0 1e c5 44 26 77 a6 c8 be 5a 0b 60 79 b8 91 d8 c9 e5 8e 26 0c 65 03 7d 5a b2 08 89 26
CN = LAWtrust SIGNING CA01 OU = organization identifier (4570229049) O = LAW Trusted Third Party Services PTY Ltd. E = info@lawtrust.co.za L = Centurion S = Gauteng C = ZA	f1 43 24 f2 4a 7e 65 26 ae 78 d5 e5 2d 19 1e f9 f0 8e 5e 5a	27 0c eb c1 1b 17 10

CN = LAWtrust Secure CA01 O = LAWtrust C = ZA	13 27 f7 9f df 4d	09 46 be 07 74 bf 32 ac 7b 0e 2e 9a be 20 d9 f4 41 52 f4 ef 19 61 1c 5f b7 79 ad c5 a9 a5 e2 f0
CN = LAWtrust AUTH CA02 O = LAWtrust C = ZA	4e 4e c5 c8 e9 42 6a 1d d3 6d 97 88 93 6a 85 e7 5d 34 ab 67	06 6f eb f4 ad 78 18 e8 15 49 8d d2 fb 7c 85 d2 ab f4 6a 52 78 33 9b af 16 3c 9f 7f fa 23 e0 24

# Appendix B – Certificate Policies and Certification Practice Statements in Scope

Certificate Policy	Begin Effective Date	End Effective Date
LAWtrust Certificate Policy	31 October 2023	31 October 2024
<u>V020</u>		
LAWtrust Certificate Policy	31 October 2024	
V021		

LAWtrust Root CA 2048 Certificate Practice Statement	Begin Effective Date	End Effective Date
LAWtrust ROOT CA 2048 CPS	31 October 2023	31 October 2024
<u>V014</u>		
LAWtrust ROOT CA 2048 CPS	31 October 2024	
V015		

LAWtrust Root CA2 (4096) Certificate Practice Statement	Begin Effective Date	End Effective Date
LAWtrust ROOT CA2 (4096)	31 October 2023	31 October 2024
<u>CPS V05</u>		
LAWtrust ROOT CA2 (4096)	31 October 2024	
CPS V06		

LAWtrust AATL CA01 Certificate Practice Statement	Begin Effective Date	End Effective Date
LAWtrust AATL CA01 CPS V006	31 October 2023	31 October 2024
LAWtrust AATL CA01 CPS V007	31 October 2024	

LAWtrust Auth CA01 Certificate Practice Statement	Begin Effective Date	End Effective Date
LAWtrust Auth CA01 CPS V007	31 October 2023	31 October 2024
LAWtrust Auth CA01 CPS V008	31 October 2024	

LAWtrust Auth CA02 Certificate Practice Statement	Begin Effective Date	End Effective Date
LAwtrust Auth CA02 CPS V001	21 June 2023	31 October 2024
LAwtrust Auth CA02 CPS V002	31 October 2024	

LAWtrust Secure CA01 Certificate Practice Statement	Begin Effective Date	End Effective Date
LAWtrust Secure CA01 CPS	31 October 2023	31 October 2024
<u>V002</u>		
LAWtrust Secure CA01 CPS	31 October 2024	
<u>V003</u>		

LAWtrust Signing CA01 Certificate Practice Statement	Begin Effective Date	End Effective Date
LAWtrust Signing CA01 CPS V007	31 October 2023	31 October 2024
LAWtrust Signing CA01 CPS V008	31 October 2024	

LAWtrust AeSign CA1 Certificate Practice Statement	Begin Effective Date	End Effective Date
LAWtrust AeSign CA1 CPS	31 October 2023	31 October 2024
<u>V008</u>		
LAWtrust AeSign CA1 CPS	31 October 2024	
<u>V009</u>		

LAWtrust AeSign CA2 Certificate Practice Statement	Begin Effective Date	End Effective Date
LAWtrust AeSign CA2 CPS V007	31 October 2023	31 October 2024
LAWtrust AeSign CA2 CPS V008	31 October 2024	

LAWtrust2048 CA2 Certificate Practice Statement	Begin Effective Date	End Effective Date
LAWtrust2048 CA2 CPS V009	31 October 2023	31 October 2024
LAWtrust2048 CA2 CPS V010	31 October 2024	