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INDEPENDENT ASSURANCE REPORT

To the management of China Financial Certification Authority Co., Ltd. ("CFCA"):

We have been engaged, in a reasonable assurance engagement, to report on CFCA management's assertion that for its Certification Authority ("CA") operations as enumerated in Appendix C, throughout the period 1 August 2024 to 31 July 2025 for its CAs as enumerated in Appendix A, CFCA has:

- disclosed its SSL certificate life cycle management business practices in its Certification Practice Statement (CPS) and Certificate Policy (CP) as enumerated in Appendix B, including its commitment to provide SSL certificates in conformity with the CA/Browser Forum Requirements on the CFCA 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 is established and protected throughout their lifecycles; and
  - SSL certificate 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

in accordance with the WebTrust Principles and Criteria for Certification Authorities - SSL Baseline - v2.8.

CFCA does not escrow its CA keys, does not provide subscriber key generation services, and does not provide certificate suspension services. Accordingly, our procedures do not extend to controls that would address those criteria.

Certification authority's responsibilities

CFCA'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.

Our independence and quality control

We have complied with the independence and other ethical requirements of the *Code of Ethics for Professional Accountants* issued by the International Ethics Standards Board for Accountants, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

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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.

Auditor's responsibilities

Our responsibility is to express an opinion on management's assertion based on our procedures. We conducted our procedures 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. 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:

(1) obtaining an understanding of CFCA's SSL certificate lifecycle management business practices, including its relevant controls over the issuance, renewal, and revocation of SSL certificates, and obtaining an understanding of CFCA's network and certificate system security to meet the requirements set forth by the CA/Browser Forum;
(2) selectively testing transactions executed in accordance with disclosed SSL 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 CFCA 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

Because of the nature and inherent limitations of controls, CFCA's ability to meet the aforementioned criteria may be affected. For example, controls may not prevent, or detect and correct, error, fraud, unauthorized access to systems and information, or failure to comply with internal and external policies or requirements. Also, the projection of any conclusions based on our findings to future periods is subject to the risk that changes may alter the validity of such conclusions.

Opinion

In our opinion, throughout the period 1 August 2024 to 31 July 2025, CFCA 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 - SSL Baseline - v2.8.

This report does not include any representation as to the quality of CFCA's services beyond those covered by the WebTrust Principles and Criteria for Certification Authorities - SSL Baseline - v2.8, nor the suitability of any of CFCA's services for any customer's intended purpose.

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

- On 4 March 2024, the representative of Google Root Program sent an email to CFCA via the registered email of CFCA for status about the error in issuance of certificates. However, CFCA failed to respond to the email in time and was requested to file an incident reporting and processing thread (Bug 1888881) for remediations; Similar Bug 1959733 was filed on 10 April 2025 for failure on receiving two CPR sent to CCADB registered contact email address within the time requirement of Section 4.9.5 of the TLS BRs. We noticed the primary contact email of CFCA in CCADB has been changed to the Gmail address mentioned in the incident reporting and processing thread, which is consistent with the Report Closure Summary dated on 24 March 2025. The person who is responsible for receiving and processing the incoming messages was also interviewed during the audit for his jobs. Bug 1888881 had been closed on 2 April 2025, and Bug 1959733 had been closed on 16 July 2025.

- During handling incident reporting and processing threads Bug 1888881, Bug 1888882 , Bug 1949131, and Bug 1886135, CFCA failed to respond within 7 days as required by the Report Lifecycle Management of Incident Reporting Guidelines. An additional incident reporting and processing thread Bug 1955799 was created on 22 March 2025 per the request. We noticed the implementation of automation workflow solution during the audit as stated in the incident reporting and processing thread on 3 April 2025 to minimize the chance for delayed responses. Bug 1955799 had been closed on 11 April 2025.

- CFCA received an email from the representative of Google Root Program about the basicConstraints extension error found in three SSL certificates issued by CFCA. An incident processing thread (Bug 1886135) on Mozilla's Bugzilla Platform created on 19 March 2024 for remediations of the mis-issued certificates. More mis-issued certificates were found after internal investigation. The remediation has been accomplished and the processing thread had been closed on 26 September 2024. Updates to necessarily more current versions of ZLint and PKIlint had been applied for remediations according to the statement on 21 August 2024 and observed during the audit.

- In 13 February 2025, CFCA received a notification from representative of Google Root Program that three certificates had BasicConstraints which were not marked as critical. An incident processing thread (Bug 1949131) on Mozilla's Bugzilla Platform created on 19 February 2025 for remediations of the mis-issuance event. After internal investigation, 47 issued certificates were found affected, but only one certificate had not expired for revocation. The root cause of Bug 1949131 had been identified as making use of the incomplete RA system data for the processing of miss-isissued certificates in Bug 1886135. RA system upgrade, as stated in the incident reporting and processing thread, was applied on 20 November 2024, according to the logs of system change management.

- In the processing of the mis-issuance incident (Bug 1886135), a total of 2098 certificates had been found during the investigation and necessary procedures applied. Following the requirement in Section 4.9.1.1 of TLS baseline requirements, 840 affected certificates were revoked within 5 days. However, the remaining certificates had not been revoked successfully within the window of time required, so a new incident processing thread (Bug 1888882) was filed for processing the delayed revocation issue. We noticed the implementation of ACME automation mechanism during the audit, which is an effort to minimize the chance of delayed revocations in the future. Bug 1888882 had been closed on 26 March 2025.

Use of the WebTrust seal

CFCA'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.

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Anthony Kam & Associates Ltd.
Certified Public Accountants
2105 Wing On Ctr, 111 Connaught Road, HK SAR, China
21 Oct 2025
KAM Hau Choi Anthony
Practising Certificate Number P02558

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Appendix A

The list of keys and certificates covered in the management's assertion is as follow:

Subject DN	Key Type	Signature Algorithm	Key Size	Subject Key Identifier	SHA256 Certificate Thumbprints	Certificate Signed by
CN = CFCA EV ROOT O = China Financial Certification Authority C = CN	Root Key	sha256RSA	4096 bits	e3fe2dfd28d00bb5bab6a2c4bf06aa058c93fb2f	5CC3D78E4E1D5E45547A04E6873E64F90CF9536D1CCC2EF800F355C4C5FD70FD	CFCA EV ROOT
CN = CFCA EV OCA O = China Financial Certification Authority C = CN	Signing Key	sha256RSA	2048 bits	5508e2dccc956d1f5ddeb347e8e916c6c04577c4	CC7253EBDE9F7E92CBA297B5BADED1B22E5CEACA525E201B4DC410F4F3504B5E	CFCA EV ROOT
CN = CFCA OV OCA O = China Financial Certification Authority C = CN	Signing Key	sha256RSA	2048 bits	66b3effb549587e9aca59656aee67ded3ad043d1	F07BBBDE076F9B40C57CC4BEFEDE97CA1F53B9AE147F035D284CBF53F3432FB8	CFCA EV ROOT
CN = CFCA DV OCA O = China Financial Certification Authority C = CN	Signing Key	sha256RSA	2048 bits	55200db47d29fe2c6dcf9dd31cbf015aa7dc81bd	DA738A474EE7473C9699ECBA8EB5F483ADA967988185A05975C4BA0C01B39559	CFCA EV ROOT
CN = CFCA Global RSA ROOT G2 O = China Financial Certification Authority C = CN	Root Key	sha512RSA	4096 bits	fb54011310034c5884e2a70684f962055d1289b7	6E6EB29F5EBA910AFFD462FC921D724E526805EFE908AEC45BD409B624E14C09	CFCA Global RSA ROOT G2
CN = CFCA DV RSA OCA G2 O = China Financial Certification Authority C = CN	Signing Key	sha256RSA	4096 bits	dcaae14b5c5a649f6b570fd0545d66a4e88e7973	CDC4606B6968C6D65FFB61B84FAD3906127C33EC7EACBB0B8B20B389767E6A0F	CFCA Global RSA ROOT G2

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CN = CFCA OV RSA OCA G2 O = China Financial Certification Authority C = CN	Signing Key	sha256RSA	4096 bits	31f12de8b7576955bb857340 14b6214a21c2fbdd	EB6C466E647A5EB633A38290FD30131DD7B887B51E1340ABB502C7AB31688F04	CFCA Global RSA ROOT G2
CN = CFCA EV RSA OCA G2 O = China Financial Certification Authority C = CN	Signing Key	sha256RSA	4096 bits	b1bcbe24db2d0a94810afa5001290dcafc2f443b	4D452B952FDCDE663C10400AED613C96BED8C4BF1A8F750D8A74D5C4183B1920	CFCA Global RSA ROOT G2
CN = CFCA Global ECC ROOT G2 O = China Financial Certification Authority C = CN	Root Key	sha384ECDSA	384 bits	cc4708eaa3d4f57626500f8786321dc992d610bd	23E4F8DA7D482CD105289433C2E10CE67C1E1092B4DC50101F6D0C346E965972	CFCA Global ECC ROOT G2
CN = CFCA DV ECC OCA G2 O = China Financial Certification Authority C = CN	Signing Key	sha384ECDSA	384 bits	c8cdaa65512277cf837ae5586899be2a0ac73069	ADBB46AF1FE1426F69BBCD0CDBD671650313A5C63993708CC4B465F14BD4E01B	CFCA Global ECC ROOT G2
CN = CFCA OV ECC OCA G2 O = China Financial Certification Authority C = CN	Signing Key	sha384ECDSA	384 bits	064e6c68b695d1454d4965838f60805657da05d6	6F6478FBFF45CC30AC0FE4EC3CC4EF3CAF0E959508B00342C229DD60C9A432A1	CFCA Global ECC ROOT G2
CN = CFCA EV ECC OCA G2 O = China Financial Certification Authority C = CN	Signing Key	sha384ECDSA	384 bits	b7202c74b5b5a5fceb183f3de7bd4ed225c5a044	80C868B316313761E34D6122AD687D462E7016FC54FDCBBA8D70F149752891C3	CFCA Global ECC ROOT G2

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Appendix B

Applicable versions of Certification Practice Statement (CPS) and Certificate Policy (CP) in-scope:

Name	Version	Date
CFCA Certificate Policy and Certification Practice Statement for Global Trusted System	4.8	21 July 2025
CFCA Certificate Policy and Certification Practice Statement for Global Trusted System	4.7	30 May 2025
CFCA Certificate Policy and Certification Practice Statement for Global Trusted System	4.6	30 August 2024
CFCA Certificate Policy and Certification Practice Statement for Global Trusted System	4.5	August 2023

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Appendix C

Locations in-scope:

Location	Function
Beijing (North), China	Datacenter Facility, Main Site
Beijing (South), China	Datacenter Facility, Backup Site
Beijing (Central), China	Administration and Support
Chengdu, China	Registrations and Customer Services

CFCA MANAGEMENT'S ASSERTION

China Financial Certification Authority Co., Ltd. ("CFCA") operates the Certification Authority (CA) services known as CAs in Appendix A and provides SSL CA services.

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

CFCA management has assessed its disclosures of its certificate practices and controls over its SSL CA services. Based on that assessment, in CFCA management's opinion, in providing its SSL CA services at locations as enumerated in Appendix C, throughout the period 1 August 2024 to 31 July 2025, CFCA has:

- disclosed its SSL certificate life cycle management business practices in its Certification Practice Statement (CPS) and Certificate Policy (CP) as enumerated in Appendix B, including its commitment to provide SSL certificates in conformity with the CA/Browser Forum Requirements on the CFCA 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 is established and protected throughout their lifecycles; and
  - SSL certificate 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 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 WebTrust Principles and Criteria for Certification Authorities - SSL Baseline - v2.8.

During this audit period, we have the following matters addressed and tracked via Mozilla's Bugzilla Platform:

- On 4 March 2024, the representative of Google Root Program sent an email to CFCA via the registered email of CFCA for status about the error in issuance of certificates. However, CFCA failed to respond to the email in time and was requested to file an incident reporting and processing thread (Bug 1888881) for remediations; Similar Bug 1959733 was filed on 10 April 2025 for failure on receiving two CPR sent to CCADB registered contact email address within the time requirement of Section 4.9.5 of the TLS BRs. We noticed the primary contact email of CFCA in CCADB has been changed to the Gmail address mentioned in the incident reporting and processing thread, which is consistent with the Report Closure Summary dated on 24 March 2025. The person who is responsible for receiving and processing the incoming messages was also interviewed during the onsite audit for the jobs. Bug 1888881 had been closed on 2 April 2025, and Bug 1959733 had been closed on 16 July 2025.

- During handling incident reporting and processing threads Bug 1888881, Bug 1888882 , Bug 1949131, and Bug 1886135, CFCA failed to respond within 7 days as required by the Report Lifecycle Management of Incident Reporting Guidelines. An additional incident reporting and processing thread Bug 1955799 was created on 22 March 2025 per the request. The implementation of an automation workflow solution as stated in the incident reporting and processing thread on 3 April 2025 to minimize the chance of delayed responses. Bug 1955799 had been closed on 11 April 2025.

- CFCA received an email from the representative of Google Root Program about the basicConstraints extension error found in three SSL certificates issued by CFCA. An incident processing thread (Bug 1886135) on Mozilla's Bugzilla Platform created on 19 March 2024 for remediations of the mis-issued certificates. More mis-issued certificates were found after internal investigation. The remediation has been accomplished and the processing thread had been closed on 26 September 2024. Updates for necessarily more current versions of ZLint and PKIlint had been applied for remediations according to the statement on 21 August 2024.

- In 13 February 2025, CFCA received a notification from representative of Google Root Program that three certificates had BasicConstraints which were not marked as critical. An incident processing thread (Bug 1949131) on Mozilla's Bugzilla Platform created on 19 February 2025 for remediations of the mis-issuance event. After internal investigation, 47 issued certificates were found affected, but only one certificate had not expired for revocation. The root cause of Bug 1949131 had been identified as making use of the incomplete RA system data for the processing of miss-isissued certificates in Bug 1886135. RA system upgrade applied on 20 November 2024 as stated in the incident reporting and processing thread for remediation on this issue.

- In the processing of the mis-issuance incident (Bug 1886135), a total of 2098 certificates had been found during the investigation and necessary procedures applied. Following the requirement in Section 4.9.1.1 of TLS baseline requirements, 840 affected certificates were revoked within 5 days. However, the remaining certificates had not been revoked successfully within the window of time required, so a new incident processing thread (Bug 1888882) was filed for processing the delayed revocation issue. The implementation ACME automation mechanism which is an effort to minimize the chance of delayed revocations in the future has been accomplished. Bug 1888882 had been closed on 26 March 2025.

Mr. 赵之印海

CEO of China Financial Certification Authority Co., Ltd.
20-3, Pingyuanli, Caishikou South Avenue, Xi Cheng District, Beijing, China

21 October 2025

Appendix A

The list of keys and certificates covered in the management's assertion is as follow:

Subject DN	Key Type	Signature Algorithm	Key Size	Subject Key Identifier	SHA256 Certificate Thumbprints	Certificate Signed by
CN = CFCA EV ROOT O = China Financial Certification Authority C = CN	Root Key	sha256RSA	4096 bits	e3fe2dfd28d00bb5bab6a2c4bf06aa058c93fb2f	5CC3D78E4E1D5E45547A04E6873E64F90CF9536D1CCC2EF800F355C4C5FD70FD	CFCA EV ROOT
CN = CFCA EV OCA O = China Financial Certification Authority C = CN	Signing Key	sha256RSA	2048 bits	5508e2dccc956d1f5ddeb347e8e916c6c04577c4	CC7253EBDE9F7E92CBA297B5BADED1B22E5CEACA525E201B4DC410F4F3504B5E	CFCA EV ROOT
CN = CFCA OV OCA O = China Financial Certification Authority C = CN	Signing Key	sha256RSA	2048 bits	66b3effb549587e9aca59656aee67ded3ad043d1	F07BBBDE076F9B40C57CC4BEFEDE97CA1F53B9AE147F035D284CBF53F3432FB8	CFCA EV ROOT
CN = CFCA DV OCA O = China Financial Certification Authority C = CN	Signing Key	sha256RSA	2048 bits	55200db47d29fe2c6dcf9dd31cbf015aa7dc81bd	DA738A474EE7473C9699ECBA8EB5F483ADA967988185A05975C4BA0C01B39559	CFCA EV ROOT
CN = CFCA Global RSA ROOT G2 O = China Financial Certification Authority C = CN	Root Key	sha512RSA	4096 bits	fb54011310034c5884e2a70684f962055d1289b7	6E6EB29F5EBA910AFFD462FC921D724E526805EFE908AEC45BD409B624E14C09	CFCA Global RSA ROOT G2
CN = CFCA DV RSA OCA G2 O = China Financial Certification Authority C = CN	Signing Key	sha256RSA	4096 bits	dcaae14b5c5a649f6b570fd0545d66a4e88e7973	CDC4606B6968C6D65FFB61B84FAD3906127C33EC7EACBB0B8B20B389767E6A0F	CFCA Global RSA ROOT G2
CN = CFCA OV RSA OCA G2 O = China Financial Certification Authority C = CN	Signing Key	sha256RSA	4096 bits	31f12de8b7576955bb85734014b6214a21c2fbdd	EB6C466E647A5EB633A38290FD30131DD7B887B51E1340ABB502C7AB31688F04	CFCA Global RSA ROOT G2

CN = CFCA EV RSA OCA G2 O = China Financial Certification Authority C = CN	Signing Key	sha256RSA	4096 bits	b1bcbe24db2d0a94810afa5001290dcafc2f443b	4D452B952FDCDE663C10400AED613C96BED8C4BF1A8F750D8A74D5C4183B1920	CFCA Global RSA ROOT G2
CN = CFCA Global ECC ROOT G2 O = China Financial Certification Authority C = CN	Root Key	sha384ECDSA	384 bits	cc4708eaa3d4f57626500f8786321dc992d610bd	23E4F8DA7D482CD105289433C2E10CE67C1E1092B4DC50101F6D0C346E965972	CFCA Global ECC ROOT G2
CN = CFCA DV ECC OCA G2 O = China Financial Certification Authority C = CN	Signing Key	sha384ECDSA	384 bits	c8cdaa65512277cf837ae5586899be2a0ac73069	ADBB46AF1FE1426F69BBCD0CDBD671650313A5C63993708CC4B465F14BD4E01B	CFCA Global ECC ROOT G2
CN = CFCA OV ECC OCA G2 O = China Financial Certification Authority C = CN	Signing Key	sha384ECDSA	384 bits	064e6c68b695d1454d4965838f60805657da05d6	6F6478FBFF45CC30AC0FE4EC3CC4EF3CAF0E959508B00342C229DD60C9A432A1	CFCA Global ECC ROOT G2
CN = CFCA EV ECC OCA G2 O = China Financial Certification Authority C = CN	Signing Key	sha384ECDSA	384 bits	b7202c74b5b5a5fceb183f3de7bd4ed225c5a044	80C868B316313761E34D6122AD687D462E7016FC54FDCBBA8D70F149752891C3	CFCA Global ECC ROOT G2

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Appendix C

Locations in-scope:

Location	Function
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Beijing (South), China	Datacenter Facility, Backup Site
Beijing (Central), China	Administration and Support
Chengdu, China	Registrations and Customer Services