

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 business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in the applicable versions of IdenTrust’s TrustID Certificate Policy (“CP”) and TrustID Certification Practice Statement (“CPS”) enumerated in [Attachment A](#)
- maintained effective controls to provide reasonable assurance that:
 - IdenTrust’s CPS is consistent with its CP; and
 - IdenTrust provides its services in accordance with its CP and 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 (for the registration activities performed by IdenTrust); 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 July 1, 2024 to June 30, 2025, based on the [WebTrust Principles and Criteria for Certification Authorities, v2.2.2](#).

IdenTrust makes use of external registration authorities for specific subscriber registration activities as disclosed in IdenTrust’s business practices. Our examination did not extend to the controls exercised by these external registration authorities.

IdenTrust does not escrow its CA keys. Accordingly, our examination did not extend to controls that would address this criterion.



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, v2.2.2](#).

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 #1919162 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.
		IdenTrust disclosed in Mozilla Bug #1910195 that it issued two (2) S/MIME Certificates with invalid special characters.
2	Certificate Validation	IdenTrust disclosed in Mozilla Bug #1914067 that two (2) CRLs had expired without being renewed.
		IdenTrust disclosed in Mozilla Bug #1933353 that 6,450 TLS Certificates it issued had an incorrect OCSP response of "unauthorized."
3	Subscriber Registration	IdenTrust disclosed in Mozilla Bug #1930029 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, v2.2.2](#).

Use of the WebTrust seal

IdenTrust'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.

September 23, 2025



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

Policy Name	Version	Effective Date
IdenTrust TrustID Certificate Policy	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
IdenTrust TrustID Certification Practice Statement	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

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 Client-Auth ECC CA 2 O = IdenTrust C = US	21E9B3A3A7957B52BF5B9A113CDE238619DEC8B068735152EAA9B996BA5B8575	4/11/2024	4/10/2044
CN = IdenTrust Commercial Root Client-Auth RSA CA 2 O = IdenTrust C = US	4F4D24CCFBEC50C4FCCF0FCF07D7906003AC07E6C8B912012733DE6DD35542	12/17/2024	12/12/2044
CN = IdenTrust Commercial Root Code Signing RSA CA 2 O = IdenTrust C = US	BC7C4E46DA2DCF0C25866027B7D164D8EA0D2E82DECA3B520A67070947B7B5D4	12/17/2024	12/12/2044
CN = IdenTrust Commercial Root SMIME ECC CA 2 O = IdenTrust C = US	3B48B18D6F20B2369A7D4056A0F5736E7650D653802305A50E83B9C3376D9E18	4/11/2024	4/11/2042
CN = IdenTrust Commercial Root Timestamp ECC CA 2 O = IdenTrust C = US	7BA2E6514976AF28A6001CDA8EADE532F7A1AAAF25E4731DF8A04DB00E7801CA	4/11/2024	4/10/2044
CN = IdenTrust Commercial Root Timestamp RSA CA 2 O = IdenTrust C = US	D309931736C8F5AAF3C20ADA97FADF11B5E2D7FD174DC97286ACD613A40AEA55	12/17/2024	12/12/2044
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 Commercial Root SMIME RSA CA 2 O=IdenTrust C=US	53850DBA0B62839FED4C0E3E1B95CB7E9C4CF2ED7C3E5AE2D3D3F535EB5A2653	12/17/2024	12/13/2042
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 01 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 CA A13 O = IdenTrust C = US	76921EDB7FE5553B0CE9DD4388C8416629EBC0ED0A1A399415AAD5C050E950A0	2/12/2020	2/12/2030
CN = TrustID CA A14 O = IdenTrust C = US	7A95A827D6A13C7C191A893D2987E4134ACB403EC9E26E8CD92525A806D794C6	8/16/2023	8/12/2033
CN = TrustID ECC ClientAuth CA 1 O = IdenTrust C = US	D463E4C8B475B21C3EEF8B9B4560A521394D1575E84760907564C398D9A749FC	12/23/2024	6/21/2032
CN = TrustID ECC Server CA 1 O = IdenTrust C = US	E3C8552F6B39366B5AAEDB7608A73E3FD68D100C1309CB15718143EA8683F254	12/23/2024	6/21/2032
CN = TrustID ECC SMIME CA 1 O = IdenTrust C = US	0E5F94F4C41242B98A7C1DB0855A390DC51F65478EF89BA0F5FCA511C355DF64	12/23/2024	6/21/2032
CN = TrustID ECC Timestamp CA 1 O = IdenTrust C = US	06F0ED21179D448A218897948542473DDAD57129A74151C3B241F857438D4E5C	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 EV Code Signing CA 3 O = IdenTrust C = US	BDC61A9F0607410E7132DE9825D5424CC4FFFFD28099B1081B2A273C74957FA4	8/20/2021	8/20/2029
CN = TrustID EV Code Signing CA 4 O = IdenTrust C = US	59AA2D256962125500C18E98014F54DFC47F815DDFC7715DAF81AA759699E431	3/18/2022	3/18/2030
CN = TrustID EV Code Signing CA 5 O = IdenTrust C = US	65D084D249B28C0CE34129263144D2B6836CDEC79060129A94C0B4618DBDB4D2	5/8/2023	5/5/2031
CN = TrustID HID Enterprise CA 1 O = HID Global C = US	64EB21A8003655488E9620EDC2B217CBBCD559253C453E735E552706695CE1878	4/17/2019	4/17/2027
CN = TrustID HID Enterprise CA 2 O = HID Global C = US	AF0926CB0E3C5A37B76F30370583C3CD63BBEC2B33CC8459849CA69D4F9C7CDE	8/16/2023	8/12/2033



Subordinate CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN = TrustID RSA ClientAuth CA 2 O = IdenTrust C = US	FDEF51501B9E1C2B9AB2FD1E880D98760FB33878658AAA304298BE493120981C	1/29/2025	1/27/2031
CN = TrustID RSA Code Signing CA 2 O = IdenTrust C = US	31E7D1B6F1B5DBEFB6C547A8580E594786DE2DC1379EB0DF8F2814F138E86A35	1/29/2025	1/28/2031
CN = TrustID RSA Server CA 2 O = IdenTrust C = US	915D668811D195CC7C9614DC3F828DF3B291B35E610ABB2E6B4493862F4DE379	1/29/2025	7/28/2032
CN = TrustID RSA Timestamp CA 2 O = IdenTrust C = US	BBDE6560812BCB31173BBF519A260F3AAFEF16700830368C26A5DCB3FD5B8CA6	1/29/2025	1/28/2031
CN = TrustID SAIC Public Email Issuing CA O = SAIC C = US	AD8D498C08DA249936BABCDDA07206C13C71E75D16BE3120BEA2D8E5720C0BB1	2/28/2019	10/13/2026
CN = TrustID SAIC Public Email Issuing CA 2 O = SAIC C = US	944586DADCE409FC51017EF473B9ADDA6EF7589F70B21430507FD245809B3BF9	8/16/2023	8/12/2033
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
CN = TrustID Timestamping CA 3 O = IdenTrust C = US	0BF6948ED05F56038876F15F305E1038A5A38981C25FCCE8B68D985950D80495	3/16/2022	6/12/2033
CN = TrustID Timestamping CA 4 O = IdenTrust C = US	BCF05F424CEE2DE68775009EFBC921B977B481C64E599CF149F427F14F559950	3/7/2025	3/6/2031
CN = TrustID Timestamping CA 5 O = IdenTrust C = US	8EECA62729D361BE56F3F4234DB73344DF039CFCE80D49418BE93AD187D9850B	3/12/2025	3/11/2031
CN=TrustID RSA SMIME CA 2 O=IdenTrust C=US	4F17A4F8650DF43D87F96CAC0202A5DF90E1F70F4E9FE943348AA3B9C3460875	1/29/2025	7/28/2032



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9/23/2025

IDENTRUST SERVICES, LLC MANAGEMENT'S ASSERTION

IdenTrust Services, LLC ("IdenTrust") operates the Certification Authority ("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 suspension
- Certificate validation
- Subscriber key generation and management
- Subordinate CA certification and cross-certification

The management of IdenTrust 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, certificate lifecycle management controls, and subordinate CA 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 IdenTrust's CA operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

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

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in the applicable versions of IdenTrust's TrustID Certificate Policy ("CP") and TrustID Certification Practice Statement ("CPS") enumerated in [Attachment A](#)
- maintained effective controls to provide reasonable assurance that:
 - IdenTrust's CPS is consistent with its CP; and
 - IdenTrust provides its services in accordance with its CP and CPS
- maintained effective controls to provide reasonable assurance that:
 - the integrity of keys and certificates it manages is established and protected throughout their lifecycles;



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- the integrity of subscriber keys and certificates it manages is established and protected throughout their lifecycles;
- subscriber information is properly authenticated (for the registration activities performed by IdenTrust); 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 July 1, 2024 to June 30, 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
- CP and CPS Consistency

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
- CA Public Key Distribution
- CA Key Usage
- CA Key Archival



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- 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

Subordinate CA and Cross Certificate Lifecycle Management Controls

- Subordinate CA Certificate and Cross Certificate Lifecycle Management Controls

IdenTrust makes use of external registration authorities for specific subscriber registration activities as disclosed in IdenTrust’s business practices. Our examination did not extend to the controls exercised by these external registration authorities.

IdenTrust does not escrow its CA keys. Accordingly, our examination did not extend to controls that would address this criterion.


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
#1895006	IdenTrust: unintended creation of a Root CA certificate	5/3/2024	8/23/2024	FIXED
#1897569	IdenTrust: TLS ICA with User Notice in Policy Qualifier	5/17/2024	8/23/2024	FIXED
#1905446	IdenTrust: Unauthorized OCSP response on a Timestamp certificate	6/28/2024	11/6/2024	FIXED



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Bug ID	Summary	Opened	Closed	Resolution
#1910195	IdenTrust: Invalid special characters in S/MIME Certificates	7/26/2024	9/6/2024	FIXED
#1914067	IdenTrust: Expired CRLs	8/20/2024	10/23/2024	FIXED
#1919162	IdenTrust: TLS Certificates with outdated certificate profile	9/16/2024	11/4/2024	FIXED
#1930029	IdenTrust: Approval of TLS certificate renewal without domain validation	11/7/2024	2/19/2025	FIXED
#1933353	IdenTrust: Incorrect response for OCSP validation	11/25/2024	3/21/2025	FIXED

Signed by:

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Don Johnson
Chief Information Officer



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

Policy Name	Version	Effective Date
IdenTrust TrustID Certificate Policy	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
IdenTrust TrustID Certification Practice Statement	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



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ATTACHMENT B - IN-SCOPE CAs

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 Client-Auth ECC CA 2 O = IdenTrust C = US	21E9B3A3A7957B52BF5B9A113CDE238619DEC8B068735152EAA9B996BA5B8575	4/11/2024	4/10/2044
CN = IdenTrust Commercial Root Client-Auth RSA CA 2 O = IdenTrust C = US	4F4D24CCFBCECD50C4FCCF0FCF07D7906003AC07E6C8B912012733DE6DD35542	12/17/2024	12/12/2044
CN = IdenTrust Commercial Root Code Signing RSA CA 2 O = IdenTrust C = US	BC7C4E46DA2DCF0C25866027B7D164D8EA0D2E82DECA3B520A67070947B7B5D4	12/17/2024	12/12/2044
CN = IdenTrust Commercial Root SMIME ECC CA 2 O = IdenTrust C = US	3B48B18D6F20B2369A7D4056A0F5736E7650D653802305A50E83B9C3376D9E18	4/11/2024	4/11/2042
CN = IdenTrust Commercial Root Timestamp ECC CA 2 O = IdenTrust C = US	7BA2E6514976AF28A6001CDA8EAE532F7A1AAAF25E4731DF8A04DB00E7801CA	4/11/2024	4/10/2044
CN = IdenTrust Commercial Root Timestamp RSA CA 2 O = IdenTrust C = US	D309931736C8F5AAF3C20ADA97FADF11B5E2D7FD174DC97286ACD613A40AEA55	12/17/2024	12/12/2044
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 Commercial Root SMIME RSA CA 2 O=IdenTrust C=US	53850DBA0B62839FED4C0E3E1B95CB7E9C4CF2ED7C3E5AE2D3D3F535EB5A2653	12/17/2024	12/13/2042



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Root CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN = IdenTrust Public Sector Root CA 1 O = IdenTrust C = US	30D0895A9A448A262091635522D1F52010B5867ACAE12C78EF958FD4F4389F2F	1/16/2014	1/16/2034



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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



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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 CA A13 O = IdenTrust C = US	76921EDB7FE5553B0CE9DD4388C8416629EBC0ED0A1A399415AAD5C050E950A0	2/12/2020	2/12/2030
CN = TrustID CA A14 O = IdenTrust C = US	7A95A827D6A13C7C191A893D2987E4134ACB403EC9E26E8CD92525A806D794C6	8/16/2023	8/12/2033
CN = TrustID ECC ClientAuth CA 1 O = IdenTrust C = US	D463E4C8B475B21C3EEF8B9B4560A521394D1575E84760907564C398D9A749FC	12/23/2024	6/21/2032
CN = TrustID ECC Server CA 1 O = IdenTrust C = US	E3C8552F6B39366B5AAEDB7608A73E3FD68D100C1309CB15718143EA8683F254	12/23/2024	6/21/2032
CN = TrustID ECC SMIME CA 1 O = IdenTrust C = US	0E5F94F4C41242B98A7C1DB0855A390DC51F65478EF89BA0F5FCA511C355DF64	12/23/2024	6/21/2032
CN = TrustID ECC Timestamp CA 1 O = IdenTrust C = US	06F0ED21179D448A218897948542473DDAD57129A74151C3B241F857438D4E5C	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 EV Code Signing CA 3 O = IdenTrust C = US	BDC61A9F0607410E7132DE9825D5424CC4FFFFD28099B1081B2A273C74957FA4	8/20/2021	8/20/2029
CN = TrustID EV Code Signing CA 4 O = IdenTrust C = US	59AA2D256962125500C18E98014F54DFC47F815DDFC7715DAF81AA759699E431	3/18/2022	3/18/2030
CN = TrustID EV Code Signing CA 5 O = IdenTrust C = US	65D084D249B28C0CE34129263144D2B6836CDEC79060129A94C0B4618DBDB4D2	5/8/2023	5/5/2031
CN = TrustID HID Enterprise CA 1 O = HID Global C = US	64EB21A8003655488E9620EDC2B217CBCD559253C453E735E552706695CE1878	4/17/2019	4/17/2027



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Subordinate CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN = TrustID HID Enterprise CA 2 O = HID Global C = US	AF0926CB0E3C5A37B76F30370583C3CD63BBEC2B33CC8459849CA69D4F9C7CDE	8/16/2023	8/12/2033
CN = TrustID RSA ClientAuth CA 2 O = IdenTrust C = US	FDEF51501B9E1C2B9AB2FD1E880D98760FB33878658AAA304298BE493120981C	1/29/2025	1/27/2031
CN = TrustID RSA Code Signing CA 2 O = IdenTrust C = US	31E7D1B6F1B5DBEFB6C547A8580E594786DE2DC1379EB0DF8F2814F138E86A35	1/29/2025	1/28/2031
CN = TrustID RSA Server CA 2 O = IdenTrust C = US	915D668811D195CC7C9614DC3F828DF3B291B35E610ABB2E6B4493862F4DE379	1/29/2025	7/28/2032
CN = TrustID RSA Timestamp CA 2 O = IdenTrust C = US	BBDE6560812BCB31173BBF519A260F3AAFEF16700830368C26A5DCB3FD5B8CA6	1/29/2025	1/28/2031
CN = TrustID SAIC Public Email Issuing CA O = SAIC C = US	AD8D498C08DA249936BABCDDA07206C13C71E75D16BE3120BEA2D8E5720C0BB1	2/28/2019	10/13/2026
CN = TrustID SAIC Public Email Issuing CA 2 O = SAIC C = US	944586DADCE409FC51017EF473B9ADDA6EF7589F70B21430507FD245809B3BF9	8/16/2023	8/12/2033
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
CN = TrustID Timestamping CA 3 O = IdenTrust C = US	0BF6948ED05F56038876F15F305E1038A5A38981C25FCCE8B68D985950D80495	3/16/2022	6/12/2033
CN = TrustID Timestamping CA 4 O = IdenTrust C = US	BCF05F424CEE2DE68775009EFBC921B977B481C64E599CF149F427F14F559950	3/7/2025	3/6/2031
CN = TrustID Timestamping CA 5 O = IdenTrust C = US	8EECA62729D361BE56F3F4234DB73344DF039CFCE80D49418BE93AD187D9850B	3/12/2025	3/11/2031
CN=TrustID RSA SMIME CA 2 O=IdenTrust C=US	4F17A4F8650DF43D87F96CAC0202A5DF90E1F70F4E9FE943348AA3B9C3460875	1/29/2025	7/28/2032

REPORT OF THE INDEPENDENT ACCOUNTANT

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

Scope

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

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in the applicable versions of its:
 - IdenTrust Global Common Certificate Policy (“IGC CP”) enumerated in [Attachment A](#); and
 - IdenTrust Global Common Certification Practice Statement (“IGC CPS”) enumerated in [Attachment A](#) that are consistent with the X.509 Certificate Policy for the U.S. Federal Bridge Certification Authority (“FBCA CP”) versions as enumerated in [Attachment A](#) (including sections 1 through 9)
- provided its CA services in accordance with its disclosed practices, including:
 - FBCA CP versions as set out in [Attachment A](#) (including sections 1 through 9); and
 - IGC CP and IGC CPS as set out in [Attachment A](#) that are consistent with the FBCA CP versions as set out in [Attachment A](#) (including sections 1 through 9)
- 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 (for the registration activities performed by IdenTrust); 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 July 1, 2024 to June 30, 2025, based on the [WebTrust Principles and Criteria for Certification Authorities v2.2.2](#).

IdenTrust makes use of external registration authorities for specific subscriber registration activities as disclosed in IdenTrust’s business practices. Our examination did not extend to the controls exercised by these external registration authorities.



IdenTrust does not escrow its CA keys and does not provide integrated circuit card lifecycle management services for subscribers. Accordingly, our examination did not extend to controls that would address those criteria.

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 v2.2.2](#).

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.



Other Matter

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

Matter Topic		Matter Description
1	Certificate Content	Where IdenTrust creates the Subject Identifier to be included in the Subject Common Name of subscriber certificates, the subjectID generated does not match the 32-character hexadecimal value described in section 3.1.5.1 of the IGC CPS.
2	Certificate Suspension	Two (2) out of 25 Subscriber Certificates were suspended by Enterprise Accounts without revoking or removing the suspension within 14 days, as described in section 4.9.16 of the IGC CP/CPS.

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 IGC 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.

BDO USA, P.C.

September 23, 2025



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

Certificate Policies

Policy Name	Version	Effective Date
IdenTrust Global Common Certificate Policy	1.5.9	September 23, 2024
IdenTrust Global Common Certificate Policy	1.5.8	September 19, 2023

Certification Practice Statements

Policy Name	Version	Effective Date
IdenTrust Global Common Certification Practice Statement	1.6.0	September 23, 2024
IdenTrust Global Common Certification Practice Statement	1.5.9	November 8, 2023

FBCA Certificate Policy

Policy Name	Version	Effective Date
X.509 Certificate Policy for the Federal Bridge Certification Authority	3.7	May 5, 2025
X.509 Certificate Policy for the Federal Bridge Certification Authority	3.6	October 25, 2024
X.509 Certificate Policy for the Federal Bridge Certification Authority	3.6	May 8, 2024



ATTACHMENT B - LIST OF CAs IN SCOPE

Root CA Certificate			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN = IdenTrust Global Common Root CA 1 O = IdenTrust C = US	09B15AD8D0CA032861892E55E746AE8DAF1BFDB53A9E5AEE8137D6F89AA11113	1/16/2014	1/16/2034

Cross-Signed CA Certificate			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN = IdenTrust Global Common Root CA 1 O = IdenTrust C = US	31EB4B1F1342406A30A0B7C2862265075B9BF8065117CB10F39E620ADA000FDA	03/28/2024	3/28/2027

Subordinate CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN = IGC CA 1 OU = IdenTrust Global Common O = IdenTrust C = US	6AB50C761E3EE72C34DB75C2F106E03AF15E2D8E2F6A672EC8FF0966BFD42E78	11/9/2017	11/7/2027
CN = IGC CA 2 OU = IdenTrust Global Common O = IdenTrust C = US	B97CF91D60638168B3F9329AA0C35CEA96EF575608B01C603C5340C23B65C2CC	10/2/2024	10/2/2031
CN = Leidos FBCA Cloud PKI CA-1 O = Leidos	AEAAE218BF167AB300A271F1D9D404113D67953E6A9957CCAA75E5A642594220	11/16/2016	11/16/2026
CN = Leidos FBCA Cloud PKI CA-2 O = Leidos	AFE03DBDE38CC874BAC3C013F8EBCD9110A8610A185BFB6E487C3B21967039DB	6/5/2024	6/5/2034
CN = IGC Device CA 1 OU = IdenTrust Global Common O = IdenTrust C = US	CC0AC905FF000B43AB6CE943EA40AD7DA67AAF1631186453AB44546ED744AAD2	3/5/2021	3/5/2031
CN = IGC Device CA 2 OU = IdenTrust Global Common O = IdenTrust C = US	0603EA410E8613A217E35A06489C8F4316F36A6D3F75635BD425A2DAAEB187E	10/12/2022	10/11/2032
CN = SAIC FBCA Cloud PKI CA 1 OU = IdenTrust Global Common O = SAIC LLC C = US	5D6D6CD106AF14BB3DDC6185949963428341B331232AED56CB1FA8B823B5E51F	3/7/2022	3/7/3030



Subordinate CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN = Advanced Health Systems Inc Direct CA 2 OU = IdenTrust Global Common O = IdenTrust S = Mississippi C = US	6A85C579862C0ADDC77D348E7E12CCA800B3511496C5CD3CD8D02A21CE180D85	10/12/2023	10/8/2033
CN = Advanced Health Systems, Inc Direct CA 1 OU = IdenTrust Global Common O = IdenTrust, LLC S = Mississippi C = US	5579B0D3B2234CDDD1D31AE9BB646B6A193B8BAE9119326C8C832CE41C6F720D	1/13/2021	1/13/2031



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9/23/2025

IDENTRUST SERVICES, LLC MANAGEMENT'S ASSERTION

IdenTrust Services, LLC ("IdenTrust") operates the Certification Authority ("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 suspension
- Certificate validation
- Subscriber key generation and management
- Subordinate CA certification

The management of IdenTrust is responsible for establishing and maintaining effective 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, certificate lifecycle management controls, and subordinate CA certificate lifecycle management controls. These controls contain monitoring mechanisms, and actions are taken to correct deficiencies identified.

These 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 CA operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

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

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in the applicable versions of its:
 - IdenTrust Global Common Certificate Policy ("IGC CP") enumerated in [Attachment A](#); and
 - IdenTrust Global Common Certification Practice Statement ("IGC CPS") enumerated in [Attachment A](#) that are consistent with the X.509 Certificate Policy for the U.S. Federal Bridge Certification Authority ("FBCA CP") versions as enumerated in [Attachment A](#) (including sections 1 through 9)
- Provided its CA services in accordance with its disclosed practices, including:
 - FBCA CP versions as set out in [Attachment A](#) (including sections 1 through 9); and



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- IGC CP and IGC CPS as set out in [Attachment A](#) that are consistent with the FBCA CP versions as set out in [Attachment A](#) (including sections 1 through 9)
- 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 (for the registration activities performed by IdenTrust); 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 July 1, 2024 to June 30, 2025, based on [WebTrust Principles and Criteria for Certification Authorities v2.2.2](#), including the following:

CA Business Practices Disclosure

- Certificate Practice Statement (CPS)
- Certificate Policy

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 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



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CA 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
- 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

Subordinate CA Certificate and Cross Certificate Lifecycle Management Controls

- Subordinate CA Certificate and Cross Certificate Lifecycle Management

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



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IdenTrust does not escrow its CA keys and does not provide integrated circuit card lifecycle management services for subscribers. Accordingly, our examination did not extend to controls that would address those criteria.

Signed by:

5AEF09ABDA0A425... 9/23/2025

Don Johnson
Chief Information Officer



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

Policy Name	Version	Effective Date
IdeaTrust Global Common Certificate Policy	1.5.9	September 23, 2024
IdeaTrust Global Common Certificate Policy	1.5.8	September 19, 2023

Policy Name	Version	Effective Date
IdeaTrust Global Common Certification Practice Statement	1.6.0	September 23, 2024
IdeaTrust Global Common Certification Practice Statement	1.5.9	November 8, 2023

FBCA Certificate Policy

Policy Name	Version	Effective Date
X.509 Certificate Policy for the Federal Bridge Certification Authority	3.7	May 5, 2025
X.509 Certificate Policy for the Federal Bridge Certification Authority	3.6	October 25, 2024
X.509 Certificate Policy for the Federal Bridge Certification Authority	3.6	May 8, 2024



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ATTACHMENT B - LIST OF CAs IN SCOPE

Root CA Certificate			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN = IdenTrust Global Common Root CA 1 O = IdenTrust C = US	09B15AD8D0CA032861892E55E746AE8DAF1BFDB53A9E5AEE8137D6F89AA11113	1/16/2014	1/16/2034

Cross-Signed CA Certificate			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN = IdenTrust Global Common Root CA 1 O = IdenTrust C = US	31EB4B1F1342406A30A0B7C2862265075B9BF8065117CB10F39E620ADA000FDA	03/28/2024	3/28/2027

Subordinate CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN = IGC CA 1 OU = IdenTrust Global Common O = IdenTrust C = US	6AB50C761E3EE72C34DB75C2F106E03AF15E2D8E2F6A672EC8FF0966BFD42E78	11/9/2017	11/7/2027
CN = IGC CA 2 OU = IdenTrust Global Common O = IdenTrust C = US	B97CF91D60638168B3F9329AA0C35CEA96EF575608B01C603C5340C23B65C2CC	10/2/2024	10/2/2031
CN = Leidos FBCA Cloud PKI CA-1 O = Leidos	AEEAE218BF167AB300A271F1D9D404113D67953E6A9957CCAA75E5A642594220	11/16/2016	11/16/2026
CN = Leidos FBCA Cloud PKI CA-2 O = Leidos	AFE03DBDE38CC874BAC3C013F8EBCD9110A8610A185BFB6E487C3B21967039DB	6/5/2024	6/5/2034
CN = IGC Device CA 1 OU = IdenTrust Global Common O = IdenTrust C = US	CC0AC905FF00B43AB6CE943EA40AD7DA67AAF1631186453AB44546ED744AAD2	3/5/2021	3/5/2031
CN = IGC Device CA 2 OU = IdenTrust Global Common O = IdenTrust C = US	0603EA410E8613A217E35A06489C8F4316F36A6D3F75635BD425A2DAAEB187E	10/12/2022	10/11/2032
CN = SAIC FBCA Cloud PKI CA 1 OU = IdenTrust Global Common O = SAIC LLC C = US	5D6D6CD106AF14BB3DDC6185949963428341B331232AED56CB1FA8B823B5E51F	3/7/2022	3/7/3030



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Subordinate CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN = Advanced Health Systems Inc Direct CA 2 OU = IdenTrust Global Common O = IdenTrust S = Mississippi C = US	6A85C579862C0ADDC77D348E7E12CCA800B3511496C5CD3CD8D02A21CE180D85	10/12/2023	10/8/2033
CN = Advanced Health Systems, Inc Direct CA 1 OU = IdenTrust Global Common O = IdenTrust,LLC S = Mississippi C = US	5579B0D3B2234CDDD1D31AE9BB646B6A193B8BAE9119326C8C832CE41C6F720D	1/13/2021	1/13/2031

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”) in Salt Lake City, Utah and Centennial, Colorado, for its CAs enumerated in [Attachment B](#), IdenTrust has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in the applicable versions of its:
 - Certification Practice Statement for the US Department of Defense External Certification Authority (ECA) Program (“ECA CPS”) enumerated in [Attachment A](#) that is consistent with the United States Department of Defense External Certification Authority X.509 Certificate Policy (“DoD CP”) versions as enumerated in [Attachment A](#) (including sections 1 through 9);
 - IdenTrust Key Recovery Practices Statement for the US Department of Defense External Certification Authority (ECA) Program (“ECA KRP”) enumerated in [Attachment A](#) that is consistent with the Key Recovery Policy for External Certification Authorities (“DoD KRP”); and
 - Memorandum of Agreements as set out in [Attachment A](#) between the External Certificate Authority Policy Management Authority and IdenTrust (including all sections)
- provided its CA services in accordance with its disclosed practices, including:
 - DoD CP versions as set out in [Attachment A](#) (including sections 1 through 9);
 - ECA CPS versions as set out in [Attachment A](#) that is consistent with the DoD CP versions as set out in [Attachment A](#) (including sections 1 through 9); and
 - Memorandum of Agreements as set out in [Attachment A](#) between the Federal PKI Policy Authority and IdenTrust (including all sections)
- 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 (for the registration activities performed by IdenTrust); 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 July 1, 2024 to June 30, 2025, based on the [WebTrust Principles and Criteria for Certification Authorities v2.2.2](#).

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

IdenTrust does not escrow its CA keys, does not provide certificate suspension services and does not provide integrated circuit card lifecycle management services for subscribers. Accordingly, our examination did not extend to controls that would address those criteria.

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 v2.2.2](#).

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 unauthorized 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.

Other Matter

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

Matter Topic		Matter Description
1	Certificate Content	Where IdenTrust creates the globally unique identifier (GUID) to be included in the Subject Common Name of subscriber certificates, the GUID generated does not match the 32-character hexadecimal value described in section 3.1.5 of the IdenTrust CPS for US DoD ECA.
2	CA Key Usage	For two (2) out of five (5) Subordinate CAs selected for testing, the validity periods were greater than the maximum validity period stated in the IdenTrust ECA CPS.

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 Salt Lake City, Utah and Centennial, Colorado, nor the suitability of any of IdenTrust's services for any customer's intended purpose.

BDO USA, P.C.

September 23, 2025



ATTACHMENT A - POLICY DOCUMENT VERSIONS IN-SCOPE

Certificate Policy

Policy Name	Version	Effective Date
United States Department of Defense External Certification Authority X.509 Certificate Policy	4.8	June 3, 2024

Certificate Practice Statements

Policy Name	Version	Effective Date
Certification Practice Statement for the US Department of Defense External Certification Authority (ECA) Program	2.5	September 9, 2024
Certification Practice Statement for the US Department of Defense External Certification Authority (ECA) Program	2.4	April 24, 2023

Key Recovery Policy

Policy Name	Version	Effective Date
Key Recovery Policy for External Certification Authorities	1.0	June 4, 2003

Key Recovery Practice Statement

Policy Name	Version	Effective Date
IdenTrust Key Recovery Practices Statement for the US Department of Defense External Certification Authority (ECA) Program	1.2	October 25, 2018

Memorandum of Agreement

Policy Name	Effective Date
Memorandum of Agreement between the External Certificate Authority Policy Management Authority and IdenTrust	March 16, 2016



ATTACHMENT B - LIST OF CAs IN SCOPE

Subordinate CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN = IdenTrust ECA S22 OU = Certification Authorities OU = ECA O = U.S. Government C = US	87F627D2EED16D206E9CE3302BE2D28BEBD9D8AE43D0A4322CAEC9C436A86E96	5/7/2019	5/7/2025
CN = IdenTrust ECA S22C OU = Certification Authorities OU = ECA O = U.S. Government C = US	C1B718CAF85E4535A07012D6F040B15B2AB3D719DC4D09F4A785E30868097FD8	5/7/2019	5/7/2025
CN = IdenTrust ECA S24 OU = Certification Authorities OU = ECA O = U.S. Government C = US	BC0F1D7DDE39ABD1440E581B46F37FACC01278EF1BFF66524C6E40D61FD8410E	2/25/2025	2/24/2035
CN = IdenTrust ECA S23 OU = Certification Authorities OU = ECA O = U.S. Government C = US	13564E34FEE6838BA9C5B042A5BF3F3FF4A80FDB67C74986E7FB306DDFA06479	4/5/2022	4/5/2028
CN = IdenTrust ECA Component S23 OU = Certification Authorities OU = ECA O = U.S. Government C = US	DBF2107C25639FE95AE2468B4279C9C88BD780AA96470875F8D9C26A2427039B	4/5/2022	4/5/2028
CN = IdenTrust ECA Component S24 OU = Certification Authorities OU = ECA O = U.S. Government C = US	A8CB0A3F7C263F29D83CDA362B3EBAADDC2C1FBAB1779BB68EF8BCD7EB36F46D	2/25/2025	2/24/2035



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9/23/2025

IDENTRUST SERVICES, LLC MANAGEMENT'S ASSERTION

IdenTrust Services, LLC ("IdenTrust") operates the Certification Authority ("CA") services for the root and subordinate CAs as enumerated in [Attachment B](#) and provides the following CA services:

- Subscriber registration
- Certificate renewal
- Certificate rekey
- Certificate issuance
- Certificate distribution
- Certificate revocation
- Certificate validation
- Subscriber key generation and management
- Subordinate CA certification

The management of IdenTrust is responsible for establishing and maintaining effective 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, certificate lifecycle management controls, and subordinate CA certificate lifecycle management controls. These controls contain monitoring mechanisms, and actions are taken to correct deficiencies identified.

These 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 CA operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

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

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in the applicable versions of its:
 - Certification Practice Statement for the US Department of Defense External Certification Authority (ECA) Program ("ECA CPS") enumerated in [Attachment A](#) that is consistent with the United States Department of Defense External Certification Authority X.509 Certificate Policy ("DoD CP") versions as enumerated in [Attachment A](#) (including sections 1 through 9);
 - IdenTrust Key Recovery Practices Statement for the US Department of Defense External Certification Authority (ECA) Program ("ECA KRP") enumerated in [Attachment A](#) that is consistent with the Key Recovery Policy for External Certification Authorities ("DoD KRP"); and



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- Memorandum of Agreements as set out in [Attachment A](#) between the External Certificate Authority Policy Management Authority and IdenTrust (including all sections)
- provided its CA services in accordance with its disclosed practices, including:
 - DoD CP versions as set out in [Attachment A](#) (including sections 1 through 9);
 - ECA CPS versions as set out in [Attachment A](#) that is consistent with the DoD CP versions as set out in [Attachment A](#) (including sections 1 through 9); and
 - Memorandum of Agreements as set out in [Attachment A](#) between the Federal PKI Policy Authority and IdenTrust (including all sections)
- 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 (for the registration activities performed by IdenTrust); 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 July 1, 2024 to June 30, 2025, based on [WebTrust Principles and Criteria for Certification Authorities v2.2.2](#), including the following:

CA Business Practices Disclosure

- Certificate Practice Statement (CPS)

CA Business Practices Management

- Certification Practice Statement Management
- CP and CPS Consistency

CA Environmental Controls

- Security Management
- Asset Classification and Management
- Personnel Security
- Physical and Environmental Security
- Operations Management
- System Access Management



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- System Development, Maintenance, and Change Management
- Disaster Recovery, Backups, and Business Continuity Management
- Monitoring and Compliance
- Audit Logging

CA 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
- 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 Certificate and Cross Certificate Lifecycle Management Controls

- Subordinate CA Certificate and Cross Certificate Lifecycle Management

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



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IdeaTrust does not escrow its CA keys, does not provide certificate suspension services and does not provide integrated circuit card lifecycle management services for subscribers. Accordingly, our examination did not extend to controls that would address those criteria.

Signed by:

5AEF09ABDA0A425... 9/23/2025

Don Johnson
Chief Information Officer



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

Certificate Policy

Policy Name	Version	Effective Date
United States Department of Defense External Certification Authority X.509 Certificate Policy	4.8	June 3, 2024

Certificate Practice Statements

Policy Name	Version	Effective Date
Certification Practice Statement for the US Department of Defense External Certification Authority (ECA) Program	2.5	September 9, 2024
Certification Practice Statement for the US Department of Defense External Certification Authority (ECA) Program	2.4	April 24, 2023

Key Recovery Policy

Policy Name	Version	Effective Date
Key Recovery Policy for External Certification Authorities	1.0	June 4, 2003

Key Recovery Practice Statement

Policy Name	Version	Effective Date
IdenTrust Key Recovery Practices Statement for the US Department of Defense External Certification Authority (ECA) Program	1.2	October 25, 2018

Memorandum of Agreement

Policy Name	Effective Date
Memorandum of Agreement between the External Certificate Authority Policy Management Authority and IdenTrust	March 16, 2016



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ATTACHMENT B - LIST OF CAs IN SCOPE

Subordinate CA Certificates			
Subject DN	SHA-256 Thumbprint	Valid From	Valid To
CN = IdenTrust ECA S22 OU = Certification Authorities OU = ECA O = U.S. Government C = US	87F627D2EED16D206E9CE3302BE2D28BEBD9D8AE43D0A4322CAEC9C436A86E96	5/7/2019	5/7/2025
CN = IdenTrust ECA S22C OU = Certification Authorities OU = ECA O = U.S. Government C = US	C1B718CAF85E4535A07012D6F040B15B2AB3D719DC4D09F4A785E30868097FD8	5/7/2019	5/7/2025
CN = IdenTrust ECA S24 OU = Certification Authorities OU = ECA O = U.S. Government C = US	BC0F1D7DDE39ABD1440E581B46F37FACC01278EF1BFF66524C6E40D61FD8410E	2/25/2025	2/24/2035
CN = IdenTrust ECA S23 OU = Certification Authorities OU = ECA O = U.S. Government C = US	13564E34FEE6838BA9C5B042A5BF3F3FF4A80FDB67C74986E7FB306DDFA06479	4/5/2022	4/5/2028
CN = IdenTrust ECA Component S23 OU = Certification Authorities OU = ECA O = U.S. Government C = US	DBF2107C25639FE95AE2468B4279C9C88BD780AA96470875F8D9C26A2427039B	4/5/2022	4/5/2028
CN = IdenTrust ECA Component S24 OU = Certification Authorities OU = ECA O = U.S. Government C = US	A8CB0A3F7C263F29D83CDA362B3EBAADD2C1FBAB1779BB68EF8BCD7EB36F46D	2/25/2025	2/24/2035