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Independent Assurance Report

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

Scope

We have been engaged, in a reasonable assurance engagement, to report on LAWtrust-CA [Management's Assertion](#) that for its Certification Authority ("CA") operations at the following locations throughout the period 1 January 2023 to 31 December 2023:

- LAWtrust Operations (Pretoria & Johannesburg, South Africa);
- LAWtrust Primary Datacenter (Johannesburg, South Africa); and
- 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 its:

- [LAWtrust Certificate Policy, V020 2023 09 01](#);
- [LAWtrust ROOT CA 2048 Certification Practice Statement, V014 2023-09-01](#);
- [LAWtrust ROOT CA2 \(4096\) Certification Practice Statement, V05 2023-09-01](#);
- [LAWtrust AATL CA01 Certification Practice Statement, V006 2023-09-01](#);
- [LAWtrust Auth CA01 Certification Practice Statement, V007 2023-09-01](#);
- [LAWtrust Auth CA02 Certification Practice Statement, V001 2023-07-14](#);
- [LAWtrust Secure CA01 Certification Practice Statement, V002 2023-09-01](#);
- [LAWtrust Signing CA01 Certification Practice Statement, V007 2023-09-01](#);
- [LAWtrust AeSign Certification Authority 2048 Certification Practice Statement, V008 2023-09-01](#);
- [LAWtrust AeSign CA02 Certification Practice Statement, V007 2023-09-01](#); and
- [LAWtrust 2048 Entrust Chained Certification Practice Statement, V009 2023-09-01](#).

— 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

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.

Registration number 1999/021543/2

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.



— 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 authorized and performed to maintain CA systems integrity

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.

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, v2.2.2, 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 the International Standard on Quality Management 1, which requires the firm to design, implement and operate a system of quality management including policies or 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:

1. 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 2023 to 31 December 2023, 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 re-certification 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
07 March 2024



Appendix A – In Scope CAs

CA Distinguished Name	SHA1 Fingerprint
CN = LAWtrust Root CA01 OU = LAW Trusted Third Party Services PTY Ltd. O = LAWtrust C = ZA	33 5A 7F F0 09 27 CF 2D F2 78 E2 C9 19 2F 7A 4D 55 34 F8 0C
CN = LAWtrust AeSign Certification Authority 2048 OU = LAW Trusted Third Party Services PTY Ltd. O = LAWtrust C = ZA	54 96 DD A2 3F 9A F4 9E 1D B2 B3 97 90 A0 F6 B9 48 F0 82 85

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 93 17 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 = organizationidentifier (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 = organizationidentifier (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	16 73 12 E4 FC A8 05 27 0C EB C1 1B 17 10 FB 30 87 1B 86 08 29 75 3D 20 99 5F 58 8D E9 A5 A9 0C
CN = LAWtrust Secure CA01 O = LAWtrust C = ZA	07 7E 11 40 9C F0 13 27 F7 9F DF 4D 99 D5 16 8B 68 4A 08 54	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

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 CA operations, including its CA business practices disclosure on its website [\[https://www.lawtrust.co.za/repository\]](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 (Glenfields Office Park, Pretoria & 20 Woodlands Drive, Johannesburg, South Africa), the LAWtrust Primary Datacenter (Johannesbrug, South Africa) and the LAWtrust Back Up Datacenter (Pretoria, South Africa), throughout the period 1 January 2023 to 31 December 2023, LAWtrust –CA has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in its:
 - [LAWtrust Certificate Policy, V020 2023 09 01](#);
 - [LAWtrust ROOT CA 2048 Certification Practice Statement, V014 2023-09-01](#);

- [LAWtrust ROOT CA2 \(4096\) Certification Practice Statement, V05 2023-09-01](#);
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 - [LAWtrust AeSign CA02 Certification Practice Statement, V007 2023-09-01](#); and
 - [LAWtrust 2048 Entrust Chained Certification Practice Statement, V009 2023-09-01](#).
- maintained effective controls to provide reasonable assurance that:
 - LAWtrust-CA's Certificate 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 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 v2.2.2](#), 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.

Signed by: Rian Pieter Schoeman
Signed at: 2024-03-07 09:56:32 +02:00
Reason: I approve this document



Rian Schoeman
Managing Executive
7 March 2024

Appendix A – In Scope CAs

CA Distinguished Name	SHA1 Fingerprint
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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	F1 43 24 F2 4A 7E 65 26 AE 78 D5 E5 2D 19 1E F9 F0 8E 5E 5A	16 73 12 E4 FC A8 05 27 0C EB C1 1B 17 10 FB 30 87 1B 86 08 29 75 3D 20 99 5F 58 8D E9 A5 A9 0C

C = ZA		
CN = LAWtrust Secure CA01 O = LAWtrust C = ZA	07 7E 11 40 9C F0 13 27 F7 9F DF 4D 99 D5 16 8B 68 4A 08 54	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