

INDEPENDENT ASSURANCE REPORT

To the management of PSW GROUP GmbH & Co. KG.

Registration Authority ("PSW-GROUP RA"):

Scope

We have been engaged, in a reasonable assurance engagement, to report on PSW-GROUP RA's management's assertion that for its Registration Authority (RA) operations at Fulda, Germany, throughout the period 01.07.2021 to 30.06.2022 for Sectigo Certification Authority has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and RA environment control practices in its webpage (section "Practice Business Disclosure" of Sectigo's products on page <https://www.psw-group.de/ssl-zertifikate/list/all/all/sectigo/all/all/all/all/0/0/ascending/page-1/>) following
 - Sectigo CPs:
 - [Sectigo WebPKI Certificate Policy, Sectigo Limited, Version 1.2, Effective: July 6, 2021,](#)
 - [Sectigo WebPKI Certificate Policy, Sectigo Limited, Version 1.3, Effective: November 15, 2021,](#)
 - [Sectigo WebPKI Certificate Policy, Sectigo Limited, Version 1.3.1, Effective: April 5, 2022,](#)
and
 - Sectigo CPSs:
 - [Sectigo Certification Practice Statement, Sectigo Limited, Version 5.2.3, Effective: May 21, 2021,](#)
 - [Sectigo Certification Practice Statement, Sectigo Limited, Version 5.3, Effective: October 1, 2021,](#)
 - [Sectigo Certification Practice Statement, Sectigo Limited, Version 5.3.1, Effective: November 15, 2021,](#)
 - [Sectigo Certification Practice Statement, Sectigo Limited, Version 5.3.2, Effective: March 22, 2022.](#)
 - [Sectigo Certification Practice Statement Sectigo Limited, Version 5.3.3, Effective: March 28, 2022](#)
- maintained effective controls to provide reasonable assurance that:
 - PSW-GROUP RA provides its services in accordance with Sectigo's Certificate Policy and Certification Practice Statement,
- maintained effective controls to provide reasonable assurance that:
 - the integrity of keys and certificate requests it manages is established and protected throughout their lifecycles;
 - the integrity of subscriber keys and certificate requests it manages is established and protected throughout their lifecycles; and

- subscriber information is properly authenticated (for the registration activities performed by PSW-GROUP RA);
- maintained effective controls to provide reasonable assurance that:
 - logical and physical access to RA systems and data is restricted to authorized individuals;
 - the continuity of key and certificate request management operations is maintained; and
 - RA systems development, maintenance, and operations are properly authorized and performed to maintain RA systems integrity

in accordance with [the WebTrust^{SM/™} Principles and Criteria for Registration Authorities Version 1.1 \(Effective November 1, 2020\)](#).

Registration authority's responsibilities

PSW-GROUP RA'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^{SM/™} Principles and Criteria for Registration Authorities Version 1.1 \(Effective November 1, 2020\)](#). The Qualified Auditor should note that this responsibility was created by Sectigo's obligation in February 2020.

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 behavior.

The firm applies International Standard on Quality Control 1, 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 PSW-GROUP RA's key and certificate request lifecycle management business practices and its controls over key and certificate request integrity, over the authenticity and confidentiality of subscriber and relying party information, over the continuity of key and certificate request lifecycle management operations and over development, maintenance and operation of systems integrity;

- (2) selectively testing transactions executed in accordance with disclosed key and certificate request 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 PSW-GROUP RA 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, PSW-GROUP RA'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 01.07.2021 to 30.06.2022, PSW-GROUP RA management's assertion, as referred to above, is fairly stated, in all material respects, in accordance with [the WebTrust^{SM/TM} Principles and Criteria for Registration Authorities Version 1.1 \(Effective November 1, 2020\)](#).

This report does not include any representation as to the quality of PSW-GROUP RA's services beyond those covered by [the WebTrust^{SM/TM} Principles and Criteria for Registration Authorities Version 1.1 \(Effective November 1, 2020\)](#), nor the suitability of any of PSW-GROUP RA's services for any customer's intended purpose.



Crowe FST Audit Ltd.

Budapest, Hungary

2022-08-30

PSW GROUP GmbH & Co. KG.

MANAGEMENT'S ASSERTION

PSW GROUP Registration Authority ("PSW-GROUP RA") is operated by PSW GROUP GmbH & Co. KG, in Fulda as Sectigo Germany relating to the issuance of website authentication, codesigning and s/mime certificates provides the following RA services related to website authentication (SSL), codesigning and s/mime certificates:

- Subscriber registration
- Receiving the Certificate Signing Requests from Applicants
- Forwarding the Certificate Signing Requests to Sectigo

The management of PSW-GROUP RA is responsible for establishing and maintaining effective controls over its RA operations, including its RA business practices disclosure on its website (<https://www.psw-group.de/>), RA business practices management, RA environmental controls, and subscriber certificate request 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 PSW-GROUP RA's Registration Authority operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

PSW-GROUP RA management has assessed its disclosures of its certificate practices and controls over its RA services. Based on that assessment, in providing its Registration Authority (RA) services at Fulda, Germany, throughout the period 01.07.2021 to 30.06.2022, PSW-GROUP RA has:

- disclosed its business, certificate request lifecycle management, and CA environment control practices in the following documents related to website authentication (SSL certificates), codesigning and s/mime certificates registered as External RA of Sectigo:
 - [Sectigo WebPKI Certificate Policy, Sectigo Limited, Version 1.2, Effective: July 6, 2021,](#)
 - [Sectigo WebPKI Certificate Policy, Sectigo Limited, Version 1.3, Effective: November 15, 2021,](#)
 - [Sectigo WebPKI Certificate Policy, Sectigo Limited, Version 1.3.1, Effective: April 5, 2022](#)
 - [Sectigo Certification Practice Statement, Sectigo Limited, Version 5.2.3, Effective: May 21, 2021,](#)
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 - [Sectigo Certification Practice Statement Sectigo Limited, Version 5.3.3, Effective: March 28, 2022.](#)
- maintained effective controls to provide reasonable assurance that:
 - PSW-GROUP RA provides its services in accordance with Sectigo's Certificate Policies and Certification Practice Statements above,
- maintained effective controls to provide reasonable assurance that:
 - the integrity of keys and certificate requests it manages is established and protected throughout their lifecycles;
 - the integrity of subscriber keys and certificate requests it manages is established and protected throughout their lifecycles; and

- subscriber information is properly authenticated (for the registration activities performed by PSW-GROUP RA;
- maintained effective controls to provide reasonable assurance that:
 - logical and physical access to RA systems and data is restricted to authorized individuals;
 - the continuity of key and certificate request management operations is maintained; and
 - RA systems development, maintenance, and operations are properly authorized and performed to maintain RA systems integrity

in accordance with [the WebTrust^{SM/TM} Principles and Criteria for Registration Authorities Version 1.1 \(Effective November 1, 2020\)](#) including the following:

RA Business Practices Disclosure

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

RA Business Practices Management

- Certificate Policy Management of Sectigo
- Certification Practice Statement Management of Sectigo

RA Environmental Controls

- Security Management
- Asset Classification and Management
- Personnel Security
- Physical & Environmental Security
- Operations Management
- System Access Management
- System Development and Maintenance
- Business Continuity Management
- Monitoring and Compliance
- Audit Logging

Subscriber Application Lifecycle Management Controls

- Subscriber-Provided Subscriber Certificate Request Acceptance Services
- Subscriber-Provided Subscriber Certificate Request Processing Services

Certificate Application Lifecycle Management Controls

- Subscriber Registration
- Subscriber Validation
- Subscriber Support

Schrenk

Patrycja Schrenk,

Geschäftsführerin of PSW GROUP GmbH & Co. KG.

Fulda, 2022-08-30