



REPORT OF THE INDEPENDENT ACCOUNTANT

To the management of CertiPath, Inc. (“CertiPath”):

Scope

We have examined the assertions by the management of [CertiPath](#) and [DigiCert, Inc.](#) (“DigiCert”), an independent subservice organization that provides Public Key Infrastructure (“PKI”) management services to CertiPath, that for its Certification Authority (“CA”) operations at California and Utah, in the United States of America, throughout the period November 1, 2019 to September 30, 2020 for its CAs enumerated in [Attachment B](#), CertiPath and DigiCert have:

- disclosed CertiPath’s business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in applicable versions of its CertiPath X.509 Certificate Policy (“CP”) (including sections 1 through 9), CertiPath CBCA Certification Practice Statement (“CBCA CPS”) and CertiPath CRCA Certification Practice Statement (“CRCA CPS”) (collectively the “CPSs”) (including sections 1 through 9), and Memorandum of Agreement between the United States Federal Public Key Infrastructure Policy Authority and CertiPath, Inc. (“MOA”) (including sections 1 through 9), as enumerated in [Attachment A](#)
- provided its CA services in accordance with its disclosed practices, including:
 - CertiPath’s CP (including sections 1 through 9)
 - CertiPath’s CBCA CPS and CRCA CPS that are consistent with CertiPath’s CP (including sections 1 through 9); and
 - the MOA (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; 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

based on the [WebTrust Principles and Criteria for Certification Authorities v2.2.](#)

CertiPath does not escrow its CA keys, does not provide subscriber key lifecycle management controls, does not provide subscriber registration, and does not provide certificate suspension services. Accordingly, our examination did not extend to controls that would address those criteria.



Certification Authority's Responsibilities

CertiPath and DigiCert management are responsible for their respective assertions, including the fairness of their presentation, and the provision of their described services in accordance with the [WebTrust Principles and Criteria for Certification Authorities v2.2.](#)

Practitioner's Responsibilities

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 assertions are 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 assertions, 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.

The relative effectiveness and significance of specific controls at CertiPath and DigiCert 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

Because of the nature and inherent limitations of controls, CertiPath's and DigiCert'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.

Independent Accountant's Opinion

In our opinion, throughout the period November 1, 2019 to September 30, 2020, CertiPath's and DigiCert's management assertions, as referred to above, are fairly stated, in all material respects.

This report does not include any representation as to the quality of CertiPath's or DigiCert's services other than its CA operations at California and Utah, in the United States of America, nor the suitability of any of CertiPath's or DigiCert's services for any customer's intended purpose.



Other Matters

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

Matter Topic	Matter Description
Subordinate CA and Cross Certificate Lifecycle Management	The CertiPath Policy Management Authority agreed to accept temporary documentation in place of a full compliance report for one organization that was not able to complete its engagement in a timely manner due to the COVID-19 pandemic and related travel restrictions.

The World Health Organization classified the COVID-19 outbreak as a pandemic in March 2020. Based on the continued increase in exposure globally, the gravity or length of the impact of the COVID-19 outbreak cannot be estimated at this time.

BDO USA, LLP

March 24, 2021



ATTACHMENT A - POLICIES IN-SCOPE

CertiPath CBCA Certification Practice Statement Version In-Scope

The CertiPath CBCA Certification Practice Statement is consistent with the CertiPath X.509 Certificate Policy and is restricted to authorized program members.

CPS Name	Version	Effective Date
CertiPath CBCA Certification Practice Statement	2.0	August 28, 2020
CertiPath CBCA Certification Practice Statement	1.8	July 11, 2017

CertiPath CRCA Certification Practice Statement Version In-Scope

The CertiPath CRCA Certification Practice Statement is consistent with the CertiPath X.509 Certificate Policy and is restricted to authorized program members.

CPS Name	Version	Effective Date
CertiPath CRCA Certification Practice Statement	2.0	August 28, 2020
CertiPath CRCA Certification Practice Statement	1.8	July 11, 2017

CertiPath X.509 Certificate Policy Versions In-Scope

The CertiPath X.509 Certificate Policy is published on the CertiPath website.

CP Name	Version	Effective Date
CertiPath X.509 Certificate Policy	3.41	July 27, 2020
CertiPath X.509 Certificate Policy	3.40	April 14, 2020
CertiPath X.509 Certificate Policy	3.39	December 18, 2019
CertiPath X.509 Certificate Policy	3.38	October 17, 2019

Memorandum of Agreement Version In-Scope

The Memorandum of Agreement pertains to the CertiPath Bridge CAs and is restricted to authorized program members.

Memorandum Name	Effective Date
Memorandum of Agreement between the United States Federal Public Key Infrastructure Policy Authority and CertiPath, Inc.	November 28, 2016



ATTACHMENT B - LIST OF CAs IN-SCOPE

CertiPath Bridge CA (“CBCA”)			
Subject Name	Serial Number	Valid From	Valid To
CN = CertiPath Bridge CA OU = Certification Authorities O = CertiPath LLC C = US	38 ef 47 1b a1 6f 9d d8 f8 fa e4 c9 a1 84 6f 9c	6/13/2011	2/21/2021
CN = CertiPath Bridge CA - G2 OU = Certification Authorities O = CertiPath LLC C = US	42 f4 67 0e 39 2a 72 2b 3e ce 45 68 40 5f 85 39	11/3/2010	11/3/2020
CN = CertiPath Bridge CA - G3 OU = Certification Authorities O = CertiPath C = US	12 17 51 7b 7a b3 a9 9a 58 3e b0 08 1a 0d 84 33	1/20/2020	1/20/2040

CertiPath Common Policy Root CA (“CRCA”)			
Subject Name	Serial Number	Valid From	Valid To
CN = CertiPath Common Policy Root Certification Authority OU = Certification Authorities O = CertiPath LLC C = US	47 ba 97 dc b5 e3 27 13 81 a6 82 7f f2 b2 e2 64	1/10/2006	1/10/2026
CN = CertiPath Common Policy Root Certification Authority - G2 OU = Certification Authorities O = CertiPath LLC C = US	59 ea fd 3a 27 1b 46 d9 34 8f e9 5d 13 39 45 51	11/3/2010	11/3/2030

CERTIPATH, INC. MANAGEMENT'S ASSERTION

CertiPath, Inc. ("CertiPath") and DigiCert, Inc. ("DigiCert"), an independent subservice organization that provides Public Key Infrastructure ("PKI") management services to CertiPath, operate the Certification Authority ("CA") services for the CAs enumerated in [Attachment B](#), and provide the following CA services:

- Certificate renewal
- Certificate rekey
- Certificate issuance
- Certificate distribution
- Certificate revocation
- Certificate validation
- Subordinate CA and cross certificate lifecycle management

The management of CertiPath is responsible for establishing controls over its CA operations, including its CA business practices disclosure on its [website](#), CA business practices management, applicable CA environmental controls, CA key lifecycle management controls, and subordinate CA 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 CertiPath's CA operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

CertiPath's management has assessed its disclosure of its certificate practices and controls over its CA services. Based on that assessment, in CertiPath management's opinion, in providing its CA services in California and Utah, in the United States of America, throughout the period November 1, 2019 to September 30, 2020, CertiPath has:

- disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in applicable versions of its CertiPath X.509 Certificate Policy ("CP") (including sections 1 through 9), CertiPath CBCA Certification Practice Statement ("CBCA CPS") and CertiPath CRCA Certification Practice Statement ("CRCA CPS") (collectively the "CPSs") (including sections 1 through 9), and Memorandum of Agreement between the United States Federal Public Key Infrastructure Policy Authority and CertiPath, Inc. ("MOA") (including sections 1 through 9), as enumerated in [Attachment A](#)
- provided its CA services in accordance with its disclosed practices, including:
 - CertiPath's CP (including sections 1 through 9)
 - CertiPath's CBCA CPS and CRCA CPS that are consistent with CertiPath's CP (including sections 1 through 9); and
 - the MOA (including sections 1 through 9)
- maintained effective controls to provide reasonable assurance that subordinate CA certificate requests are accurate, authenticated, and approved

based on the [WebTrust Principles and Criteria for Certification Authorities v2.2](#), including the following:

CA Business Practices Disclosure

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

CA Business Practices Management

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

CA Environmental Controls

- Security Management
- Personnel Security
- Disaster Recovery, Backups, and Business Continuity Management
- Monitoring and Compliance
- Audit Logging

CA Key Lifecycle Management Controls

- CA Public Key Distribution

Subordinate CA Certificate Lifecycle Management Controls

- Subordinate CA and Cross Certificate Lifecycle Management

CertiPath does not escrow its CA keys, does not provide subscriber key lifecycle management controls, does not provide subscriber registration, and does not provide certificate suspension services. Accordingly, our assertion does not extend to controls that would address those criteria.

CertiPath, Inc.

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3/24/2021

Jeff Nigriny
CEO

ATTACHMENT A - POLICIES IN-SCOPE

CertiPath CBCA Certification Practice Statement Version In-Scope

The CertiPath CBCA Certification Practice Statement is consistent with the CertiPath X.509 Certificate Policy and is restricted to authorized program members.

CPS Name	Version	Effective Date
CertiPath CBCA Certification Practice Statement	2.0	August 28, 2020
CertiPath CBCA Certification Practice Statement	1.8	July 11, 2017

CertiPath CRCA Certification Practice Statement Version In-Scope

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Subject Name	Serial Number	Valid From	Valid To
CN = CertiPath Bridge CA OU = Certification Authorities O = CertiPath LLC C = US	38 ef 47 1b a1 6f 9d d8 f8 fa e4 c9 a1 84 6f 9c	6/13/2011	2/21/2021
CN = CertiPath Bridge CA - G2 OU = Certification Authorities O = CertiPath LLC C = US	42 f4 67 0e 39 2a 72 2b 3e ce 45 68 40 5f 85 39	11/3/2010	11/3/2020
CN = CertiPath Bridge CA - G3 OU = Certification Authorities O = CertiPath C = US	12 17 51 7b 7a b3 a9 9a 58 3e b0 08 1a 0d 84 33	1/20/2020	1/20/2040

CertiPath Common Policy Root CA ("CRCA")			
Subject Name	Serial Number	Valid From	Valid To
CN = CertiPath Common Policy Root Certification Authority OU = Certification Authorities O = CertiPath LLC C = US	47 ba 97 dc b5 e3 27 13 81 a6 82 7f f2 b2 e2 64	1/10/2006	1/10/2026
CN = CertiPath Common Policy Root Certification Authority - G2 OU = Certification Authorities O = CertiPath LLC C = US	59 ea fd 3a 27 1b 46 d9 34 8f e9 5d 13 39 45 51	11/3/2010	11/3/2030



DIGICERT, INC. MANAGEMENT'S ASSERTION

DigiCert, Inc. ("DigiCert") provides Public Key Infrastructure ("PKI") management services to CertiPath, Inc. ("CertiPath"), who operates the Certification Authority ("CA") services for the CAs enumerated in [Attachment B](#). DigiCert provides the following PKI services to CertiPath:

- Certificate renewal
- Certificate rekey
- Certificate issuance
- Certificate distribution
- Certificate revocation
- Certificate validation

The management of DigiCert is responsible for establishing controls over its operations, to support CertiPath's CA business practices disclosures on CertiPath's [repository](#), applicable CA environmental controls, CA key lifecycle management controls, and subordinate CA 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 DigiCert's PKI services. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

DigiCert's management has assessed CertiPath's disclosure of its certificate practices and DigiCert's controls to provide its PKI services to CertiPath. Based on that assessment, in DigiCert management's opinion, in providing its PKI services at California and Utah, in the United States of America, throughout the period November 1, 2019 to September 30, 2020, DigiCert has:

- maintained effective controls to provide reasonable assurance that the integrity of keys and certificates it manages is established and protected throughout their lifecycles
- 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

based on the [WebTrust Principles and Criteria for Certification Authorities v2.2](#), including the following:



CA Environmental Controls

- Security Management
- Asset Classification and Management
- Personnel Security
- Physical and Environmental Security
- Operations Management
- System Access Management
- Systems 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
- CA Key Destruction
- CA Key Compromise
- CA Cryptographic Hardware Lifecycle Management
- CA Key Transportation
- CA Key Migration

Certificate Lifecycle Management Controls

- Certificate Renewal
- Certificate Rekey
- Certificate Issuance
- Certificate Distribution
- Certificate Revocation
- Certificate Validation

DigiCert, Inc.

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3/24/2021

Jeremy Rowley
EVP of Product