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Your ref PKI WebTrust
Accreditation
Assessment 2021

Our ref LAWTrust_CYBER2
0_0_Webtrust 2021-
2021 Assessment

Contact Duffield, Devon
(+27832867588)

31 March 2022

Independent Assurance Report

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

Introduction

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 LAWtrust House (85 Regency Drive, Route 21, Corporate Park, Irene, Centurion, 0157, (Pre 30 November 2021)), at Altron Head office (20 Woodlands Drive, Woodmead, Johannesburg, Gauteng, 2191), (Post 30 November 2021), the LAWtrust Vault (Located at Vodacom Corporate Park, 082 Vodacom Boulevard, Vodavalley, Midrand, South Africa) and the LAWtrust Back Up Vault (Located at 231 Frans Du Toit Street, Rosslyn East, Pretoria), throughout the period 1 January 2021 to 31 December 2021 for the 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 ROOT CA 2048 CERTIFICATION PRACTICE STATEMENT, V011, Dated 2021-08-05;](#)
 - [LAWTRUST ROOT CA2 \(4096\) CERTIFICATION PRACTICE STATEMENT, V002, Dated 2021-08-06;](#)
 - [LAWtrust AATL CA01 Certification Practice Statement \(LT ISP AATL CEN-SSCD CPS\), V004, Dated 2021-08-25;](#)
 - [LAWtrust Auth CA01 Certification Practice Statement \(LT ISP AuthCA01 CPS\), V002, Dated 2021-09-28;](#)
 - [LAWtrust Signing CA01 Certification Practice Statement \(LAWtrust SigningCA01 CEN-SSCD CPS\), V002, Dated 2021-08-22;](#)
 - [LAWTRUST AESIGN CERTIFICATION AUTHORITY 2048 CERTIFICATION PRACTICE STATEMENT, V006, Dated 2021-08-31;](#)
 - [LAWtrust AeSign CEN-SSCD CA Certification Practice Statement \(LAWtrust AeSign CEN-SSCD CPS\), V005, Dated 2021-08-14;](#)
 - [LAWtrust 2048 Entrust Chained Certification Practice Statement \(LAWtrust 2048 CA2 CPS\), V007, Dated 2021-10-04](#)
- Maintained effective controls to provide reasonable assurance that:
- LAWtrust-CA's Certification Practice Statements are consistent with its Certificate Policy
 - LAWtrust-CA provided its services in accordance with its Certificate Policy(ies) 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;
 - subscriber information is properly authenticated (for the registration activities performed by LAWtrust-CA); 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 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 *Trust Service Principles and Criteria for Certification Authorities v2.2.1*, 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 escrow its CA keys. Accordingly, our procedures did not extend to controls that would address those criteria.

Certification authority's responsibilities

LAWtrust-CA management are responsible for their assertion, including the fairness of its presentation, and the provision of its described services in accordance with the WebTrust *Trust Service Principles and Criteria for Certification Authorities v2.2.1* and those provisions contained within Chapter 3 of the Accreditation Regulations of the Electronic Communications and Transaction Act of 2002.

Our independence and quality control

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 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 (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

Because of the nature and inherent limitations of controls, LAWtrust-CA's ability to meet the aforementioned criteria may be affected. For example, controls may not prevent, or detect and correct, error, fraud, unauthorised 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 January 2021 to 31 December 2021, LAWtrust-CA Management's Assertion, as referred to above, is fairly stated, in all material respects, in accordance with the WebTrust *Trust Service Principles and Criteria for Certification Authorities v2.2.1*, 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 *Trust Service Principles and Criteria for Certification Authorities v2.2.1*, 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

As indicated, this report is for the purpose of providing information to the CPA Web Trust Certification Authorities in order to obtain Web Trust Certification and may not be suitable for any other purpose.

Use of WebTrust's Seal for Certification Authorities

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.



LAW Trusted Third Party Services (Pty) Ltd
Independent Assurance Report
31 March 2022

KPMG Inc

A handwritten signature in black ink, appearing to read 'Devon C Duffield'. The signature is fluid and cursive, with a horizontal line underneath the main body of the text.

Per Devon C Duffield
Chartered Accountant (SA)
Registered Auditor
Director
31 March 2022

Appendix A – In Scope CAs

CA Distinguished Name	SHA1 Fingerprint
CN = LAWtrust Root Certification Authority 2048 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	FA FF F8 C2 03 9B 4B 45 AA B8 7E EB CD 4A 56 1F CE A4 46 D6

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	C3 BA B7 57 3F C7 84 2E F8 91 F7 A8 2D 29 79 72 B3 E6 49 69	1D F0 A4 70 EA BE DB D3 A8 CD 7C 78 14 C9 A6 E6 D0 D3 BF B4 21 B2 DB FA 87 83 DF D9 69 52 46 D6



CN = LAWtrust AUTH CA01 O = LAWtrust C = ZA	B6 53 87 FD 7E A0 11 31 C9 A3 12 DD 48 3D 27 C0 EC 75 B2 24	5D 4E 80 ED DE 6A 9A FC 86 10 DF 15 15 C2 BF 6D 46 1D 4E 56 74 A6 D8 B2 35 12 C1 F9 F2 26 7D 8A
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	FD 36 45 2B B7 F3 4A A4 76 30 E7 A0 DD 63 40 85 72 88 4B CB	42 94 CE 35 BE B1 DE 5B 6D 14 98 B0 37 62 2C D4 70 87 6B 92 81 14 51 F8 C9 26 CE C1 D1 DE 12 76



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 validation
- Subordinate CA certification

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>], 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 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 House (85 Regency Drive, Route 21, Corporate Park, Irene, Centurion, 0157, (Pre 30 November 2021)), at Altron Head office (20 Woodlands Drive, Woodmead, Johannesburg, Gauteng, 2191), (Post 30 November 2021), the LAWtrust Vault (Located at Vodacom Corporate Park, 082 Vodacom Boulevard, Vodavalley, Midrand, South Africa) and the LAWtrust Back Up Vault (Located at 231 Frans Du Toit Street, Rosslyn East, Pretoria), throughout the period 1 January 2021 to 31 December 2021, has:

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 - [LAWtrust AATL CA01 Certification Practice Statement \(LT ISP AATL CEN-SSCD CPS\), V004, Dated 2021-08-25](#);

- [LAWtrust Auth CA01 Certification Practice Statement \(LT ISP AuthCA01 CPS\), V002, Dated 2021-09-28;](#)
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 - 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 *Trust Service Principles and Criteria for Certification Authorities v2.2.1*, 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 and Maintenance
- 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 and Destruction
- CA Key Compromise
- CA Cryptographic Hardware Lifecycle Management

Subscriber Key Lifecycle Management Controls

- 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 Lifecycle Management Controls

- Subordinate CA Certificate Lifecycle Management

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 escrow its CA keys. Accordingly, our procedures did not extend to controls that would address those criteria.

Rian Schoeman
Managing Executive
31 March 2022

Appendix A – In Scope CAs

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CN = LAWtrust AeSign Certification Authority 2048 OU = LAW Trusted Third Party Services PTY Ltd. O = LAWtrust C = ZA	FA FF F8 C2 03 9B 4B 45 AA B8 7E EB CD 4A 56 1F CE A4 46 D6

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	C3 BA B7 57 3F C7 84 2E F8 91 F7 A8 2D 29 79 72 B3 E6 49 69	1D F0 A4 70 EA BE DB D3 A8 CD 7C 78 14 C9 A6 E6 D0 D3 BF B4 21 B2 DB FA 87 83 DF D9 69 52 46 D6
CN = LAWtrust AUTH CA01 O = LAWtrust C = ZA	B6 53 87 FD 7E A0 11 31 C9 A3 12 DD 48 3D 27 C0 EC 75 B2 24	5D 4E 80 ED DE 6A 9A FC 86 10 DF 15 15 C2 BF 6D 46 1D 4E 56 74 A6 D8 B2 35 12 C1 F9 F2 26 7D 8A
CN = LAWtrust SIGNING CA01 OU = organizationidentifier(4570229049) O = LAW Trusted Third Party Services PTY Ltd.	FD 36 45 2B B7 F3 4A A4 76 30 E7 A0 DD 63 40 85 72 88 4B CB	42 94 CE 35 BE B1 DE 5B 6D 14 98 B0 37 62 2C D4 70 87 6B 92 81 14 51 F8 C9 26 CE C1 D1 DE 12 76

E = info@lawtrust.co.za L = Centurion S = Gauteng C = ZA		
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