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Your ref PKI WebTrust  
Accreditation  
Assessment 2019-  
2020  
Our ref LAWTrust\_CYBER2  
O\_Webtrust PKI  
Accreditation  
Contact Devon C Duffield  
(+27832867588)

31 March 2020

## **Independent Practitioner's Reasonable Assurance Report on the Certification Authority Operations of the LAW Trusted Third Party Services (Pty) Ltd**

### **Introduction**

We have been engaged to provide reasonable assurance on the LAW Trusted Third Party Services (Pty) Ltd (LAWtrust) Management's assertion that, for its Certification Authority (CA) operations at LAWtrust House (85 Regency Drive, Route 21, Corporate Park, Irene, Centurion, 0157), the LAWtrust Vault (Located at Vodacom Corporate Park, 082 Vodacom Boulevard, Vodavally, Midrand, South Africa) and the LAWtrust Back Up Vault (Located at 231 Frans Du Toit Street, Rosslyn East, Pretoria), throughout the period 1 January 2019 to 31 December 2019 for the CAs as enumerated in [Appendix A](#), LAWtrust has:

- Disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in its:
  - LAWtrust Root Certification Practice Statement (LAWtrust Root CA 2048 CPS), v109, dated 2018-12-14
  - LAWtrust AeSign CA Certification Practice Statement (LAWtrust AeSign CPS), v105, dated 2018-12-12

KPMG Inc, a company incorporated under the South African Companies Act and a member firm of the KPMG network of independent member firms affiliated with KPMG International Cooperative ("KPMG International"), a Swiss entity.

KPMG Inc is a Registered Auditor, in public practice, in terms of the Auditing Profession Act, 26 of 2005.

Registration number 1999/021543/21

Chief Executive: I Sehoole  
Directors: Full list on website

The company's principal place of business is at KPMG Crescent, 85 Empire Road, Parktown, where a list of the directors' names is available for inspection.



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- LAWtrust AeSign CEN-SSCD CA Certification Practice Statement (LAWtrust AeSign CEN-SSCD CA CPS), v103, dated 2018-08-13
  - LAWtrust AATL CA01 Certification Practice Statement (LAWtrust AATL CEN-SSCD CPS), VI02, dated 2019-03-18
  - LAWtrust 2048 Entrust Chained Certification Practice Statement (LAWtrust 2048 CA2 CPS), V006, dated 2019-12-11
- Maintained effective controls to provide reasonable assurance that:
- LAWtrust's Certification Practice Statements are consistent with its Certificate Policy
  - LAWtrust provided its services in accordance with its 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); 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 v2.1*, and those provisions contained within Chapter 3 of the Accreditation Regulations of the Electronic Communications and Transaction Act of 2002.

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

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



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## **Certification authority's responsibilities**

LAWtrust 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 v2.1* 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 Sections 290 and 291 of the Independent Regulatory Board for Auditors' *Code of Professional Conduct for Registered Auditors (Revised January 2018)* and parts 1 and 3 of the Independent Regulatory Board for Auditors' *Code of Professional Conduct for Registered Auditors (Revised November 2018)* (together the IRBA Codes), which are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. The IRBA Codes are consistent with the corresponding sections of the International Ethics Standards Board for Accountants' *Code of Ethics for Professional Accountants (including International Independence Standards)* respectively.

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.

## **Practitioner's responsibilities**

Our responsibility is to express a reasonable assurance opinion on the LAWtrust 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:

- obtaining an understanding of LAWtrust'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;
- selectively testing transactions executed in accordance with disclosed key and certificate lifecycle management business practices;
- testing and evaluating the operating effectiveness of the above controls; and
- performing such other procedures as we considered necessary in the circumstances.



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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 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'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 2019 to 31 December 2019, LAWtrust 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 v2.1*, 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's services beyond those covered by the WebTrust *Trust Service Principles and Criteria for Certification Authorities v2.1*, 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'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. This report is also intended for customers who have used LAWtrust's services who have a sufficient understanding to consider it, along with other information including information about controls operated by customers themselves, when obtaining an understanding of customers' information systems.



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**Use of WebTrust's Seal for Certification Authorities**

LAWtrust'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

KPMG Inc.

A handwritten signature in black ink, appearing to read 'Devon C Duffield', with a horizontal line underneath.

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

31 March 2020



**LAW Trusted Third Party Services (Pty) Ltd**

ISAE 3000 Reasonable Assurance Engagement Letter on Law Trusted Third Party Services (Pty) Ltd Public Key Operations (PKO)  
31 March 2020

**Appendix A – In Scope CAs**

CA Distinguished Name	SHA1 Fingerprint
<b>CN = LAWtrust Root Certification Authority 2048</b> 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
<b>CN = LAWtrust AeSign Certification Authority 2048</b> 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
<b>CN = LAWtrust AeSign CA02</b> 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
<b>CN = LAWtrust AATL CA01</b> 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
<b>CN = LAWtrust2048 CA2</b> 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

Statement by Management as to its Disclosure of its Business Practices and its Controls over its Certification Authority Operations during the period 01 January 2019 to 31 December 2019

#### LAWTrust MANAGEMENT'S ASSERTION

Law Trusted Third Party Services (Pty) Ltd ("LAWtrust") operates the Certification Authority (CA) services known as

- LAWtrust Root Certification Authority 2048 (Root CA)
- LAWtrust AeSign Certification Authority 2048 (AeSign CA01)
- LAWtrust AeSign CA02 (AeSign CA02)
- LAWtrust AATL CA01 (AATL CA01)
- LAWtrust2048 CA2 (LT2048 CA),

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 LAWtrust 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>] and/or internal repositories, 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's Certification Authority operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

LAWtrust's Management has assessed its disclosures of its certificate practices and controls over its CA services. Based on that assessment, in LAWtrust's Management's opinion, in providing its Certification Authority (CA) services at operations at LAWtrust House (85 Regency Drive, Route 21, Corporate Park, Irene, Centurion, 0157), the LAWtrust Vault (Located at Vodacom Corporate Park, 082 Vodacom Boulevard, Vodavally, Midrand, South Africa) and the LAWtrust Back Up Vault (Located at 231 Frans Du Toit Street, Rosslyn East, Pretoria),

t +27 12 676 9240 f +27 12 665 3997

e [info@lawtrust.co.za](mailto:info@lawtrust.co.za) w [www.lawtrust.co.za](http://www.lawtrust.co.za)

a 85 Regency Drive, Route 21 Corporate Park, Irene, Centurion 0157

p Postnet Suite 412, Private Bag X111, Centurion, 0046

d Maeson Maherry, Elvin de Kock, Anrisha Ramsunkar (CFO), Christi Maherry (Executive)  
**LAW TRUSTED THIRD PARTY SERVICES (PTY) LTD** • Registration Number 2001/004386/07

throughout the period 1 January 2019 to 31 December 2019 for the CAs as enumerated in [Appendix A](#), LAWtrust has

- Disclosed its business, key lifecycle management, certificate lifecycle management, and CA environmental control practices in its:
  - LAWtrust Root Certification Practice Statement (LAWtrust Root CA 2048 CPS), v109, dated 2018-12-14
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  - 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;
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  - 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 v2.1*, 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**

- 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 Lifecycle Management Controls**

- Subordinate CA Certificate Lifecycle Management

LAWtrust does not escrow its CA keys. Accordingly, our assertion does not extend to controls that would address those criteria.

Christi Maherry  
Chief Executive Officer

31/03/2020

## Appendix A – In Scope CAs

CA Distinguished Name	SHA1 Fingerprint
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CA Distinguished Name	SHA1 Fingerprint	SHA256 Fingerprint
<b>CN = LAWtrust AeSign CA02</b> 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
<b>CN = LAWtrust AATL CA01</b> 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
<b>CN = LAWtrust2048 CA2</b> 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