



KPMG Inc  
KPMG Crescent  
85 Empire Road, Parktown, 2193,  
Private Bag 9, Parkview, 2122, South Africa  
Telephone +27 (0)11 647 7111  
Fax +27 (0)11 647 8000  
Docex 472 Johannesburg  
Web <http://www.kpmg.co.za>

Attention: Christi Maherry  
Directors of LAW Trusted Third Party  
Services (Pty) Ltd  
LAW Trusted Third Party Services (Pty) Ltd  
85 Regency Drive  
Route 21  
Corporate Park  
Irene  
Centurion  
0157

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Contact Devon C Duffield  
(+27832867588)

08 July 2019

## **Independent Reasonable Assurance Report on the Certificate Authority Services of 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) and the LAWtrust Vault (Located at Vodacom Corporate Park, 082 Vodacom Boulevard, Vodavally, Midrand, South Africa), throughout the period 1 January 2018 to 31 December 2018 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
  - LAWtrust AeSign CEN-SSCD CA Certification Practice Statement (LAWtrust AeSign CEN-SSCD CA CPS), v103, dated 2018-08-13

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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- Maintained effective controls to provide reasonable assurance that:
  - LAWtrust's Certificate 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 ISO/SANS 21188 standard.

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.

### **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 ISO/SANS 21188 standard.

### **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



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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 an 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.

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



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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 2018 to 31 December 2018, 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 ISO/SANS 21188 standard.

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 ISO/SANS 21188 standard, 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 sincerely

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.

Per Devon C Duffield  
Chartered Accountant (SA)  
Registered Auditor  
Director  
08 July 2019



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**Appendix A – In Scope CAs**

<b>CA Distinguished Name</b>	<b>SHA1 Fingerprint</b>
<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

<b>CA Distinguished Name</b>	<b>SHA256 Fingerprint</b>
<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