

AUDIT ATTESTATION FOR NETLOCK LTD.

Unique Document ID	I-NL22T_TAN-AAL-01	
Project ID	I-NL22T	NETLOCK Ltd. Trust Services Certification 2022.
MATRIX Director of Certification	Ádám Molnár	
Date	Budaörs, 2022-09-01	

To whom it may concern,

This is to confirm that MATRIX Ltd. as an accredited conformity assessment body has audited the Cas of the NETLOCK Ltd. without critical findings.

This present Audit Attestation Letter is registered under the unique identifier number I-NL22T_TAN-AAL-01 and consist of 14 pages.

Kindly find here below the details accordingly.

In case of any question, please contact:

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With best regards,

Ádám Molnár
Director of Certification

1. AUDIT ATTESTATION FOR NETLOCK LTD.

<p>Identification of the conformity assessment body (CAB) and assessment organization acting as ETSI auditor:</p>	<ul style="list-style-type: none"> • MATRIX Auditing, Evaluating and Certification Ltd., Szabadság út 290., H-2040 Budaörs, Hungary registered under 13-09-084216 • Accredited by National Accreditation Authority under registration NAH-6-0054/2019/K for the certification of trust services according to EN ISO/IEC 17065:2013 and ETSI EN 319 403 V2.2.2 (2015-08) and/or ETSI EN 319 403-1 V2.3.1 (2020- 06) respectively. • Insurance Carrier (BRG section 8.2): K&H Biztosító Zrt. (K&H Insurance) • Third-party affiliate audit firms involved in the audit: none.
<p>Identification and qualification of the audit team:</p>	<ul style="list-style-type: none"> • Number of team members: 3 • Academic qualifications of team members: All team members have formal academic qualifications or



	<p>professional training or extensive experience indicating general capability to carry out audits based on the knowledge given below and at least four years full time practical workplace experience in information technology, of which at least two years have been in a role or function relating to relevant trust services, public key infrastructure, information security including risk assessment/management, network security and physical security.</p> <ul style="list-style-type: none"> • Additional competences of team members: All team members have knowledge of <ol style="list-style-type: none"> 1) audit principles, practices and techniques in the field of CA/TSP audits gained in a training course of at least five days; 2) the issues related to various areas of trust services, public key infrastructure, information security including risk assessment/management, network security and physical security; 3) the applicable standards, publicly available specifications and regulatory requirements for CA/TSPs and other relevant publicly available specifications including standards for IT product evaluation; and 4) the Conformity Assessment Body's processes. <p>Furthermore, all team members have language skills appropriate for all organizational levels within the CA/TSP organization; note-taking, report-writing, presentation, and interviewing skills; and relevant personal attributes: objective, mature, discerning, analytical, persistent and realistic.</p> <ul style="list-style-type: none"> • Professional training of team members: See "Additional competences of team members" above. Apart from that are all team members trained to demonstrate adequate competence in: <ol style="list-style-type: none"> a) knowledge of the CA/TSP standards and other relevant publicly available specifications; b) understanding functioning of trust services and information security including network security issues; c) understanding of risk assessment and risk management from the business perspective; d) technical knowledge of the activity to be audited; e) general knowledge of regulatory requirements relevant to TSPs; and f) knowledge of security policies and controls. <ul style="list-style-type: none"> • Types of professional experience and practical audit experience: The CAB ensures, that its personnel performing audits maintains competence on the basis of appropriate education, training or experience; that all relevant experience is current
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	<p>and prior to assuming responsibility for performing as an auditor, the candidate has gained experience in the entire process of CA/TSP auditing. This experience shall have been gained by participating under supervision of lead auditors in a minimum of four TSP audits for a total of at least 20 days, including documentation review, on-site audit and audit reporting.</p> <ul style="list-style-type: none"> Additional qualification and experience Lead Auditor: On top of what is required for team members (see above), the Lead Auditor <ul style="list-style-type: none"> a) has acted as auditor in at least three complete TSP audits; b) has adequate knowledge and attributes to manage the audit process; and c) has the competence to communicate effectively, both orally and in writing. <ul style="list-style-type: none"> Special skills or qualifications employed throughout audit: none. Special Credentials, Designations, or Certifications: All members are qualified and registered assessors within the accredited CAB. Auditors code of conduct incl. independence statement: Code of Conduct as of Annex A, ETSI EN 319 403 or ETSI EN 319 403-1 respectively.
Identification and qualification of the reviewer performing audit quality management:	<ul style="list-style-type: none"> Number of Reviewers/Audit Quality Managers involved independent from the audit team: 1 The reviewer fulfils the requirements as described for the Audit <p>Team Members above and has acted as an auditor in at least three complete CA/TSP audits.</p>
Identification of the CA / Trust Service Provider (TSP):	NETLOCK Informatics and Network Security Services Limited Liability Company, Expo tér 5-7., H-1101 Budapest, Hungary, registered under company registration 01-09-563961

Type of audit:	Period of time, full audit
Audit period covered for all policies:	2021-09-04 to 2022-08-26
Point in time date:	none, as audit was pot audit
Audit dates:	2022-07-26 to 2022-08-12 2022-08-15 to 2022-08-22

Audit location:	H-1143 Budapest, Hungária körút 17, Hungary H-1101 Budapest, Expo tér 5-7, Hungary H-1087 Budapest, Asztalos Sándor út 13., Hungary
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Standards considered:	<p>European Standards:</p> <p>ETSI EN 319 401 V2.3.1 (2021-05) ETSI EN 319 411-1 V1.3.1 (2021-05) ETSI EN 319 411-2 V2.4.1 (2021-11) ETSI EN 319 412-1 V1.4.4 (2021-05) ETSI EN 319 412-2 V2.2.1 (2020-07) ETSI EN 319 412-3 V1.2.1 (2020-07) ETSI EN 319 412-4 V1.2.1 (2021-11) ETSI EN 319 412-5 V2.3.1 (2020-04)</p> <p>CA Browser Forum Requirements:</p> <p>EV SSL Certificate Guidelines, version 1.7.8 Baseline Requirements, version 1.8.0</p> <p>Other:</p> <p>Mozilla Root Store Policy V2.8 (2022-06-01) Microsoft Trusted Root Certificate Program (2022-08-19) Chrome Root Program (2022-06-01)</p> <p>For the Trust Service Provider Conformity Assessment:</p> <p>ETSI EN 319 403 V2.2.2 (2015-08) ETSI TS 119 403-2 V1.2.4 (2020-11)</p>
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The full annual audit was based on the following policy and practice statement documents of the CA / TSP:

1. PKI Disclosure Statement, version 20210716, as of 2021-07-16
2. Service Policy for Qualified Certification Services, version 211015, as of 2021-10-15
3. Service Policy for Non-Qualified Certification Service, version 20200731, as of 2020-07-31
4. Service Policy for Non-eIDAS Certification Service, version 20210429, as of 2021-04-29
5. Service Practice Statement for Qualified Certificate Services, version 220815, as of 2022-08-15
6. Service Practice Statement for Non-Qualified Certification Service, version 20201119, as of 2020-11-19
7. Service Practice Statement for Non-eIDAS Certification Service, version 20210830, as of 2021-08-30

In the following areas, non-conformities have been identified throughout the audit:

Findings with regard to ETSI EN 319 401:

7.1 Internal organization

The TSP shall provide sufficient human resources for the compliance department, as on audit it was found that lower resources have been delegated for the department which leads to risk to fulfill their roles. [REQ-7.1.1-05]

7.8 Human resources

The TSP shall make report of the new personnel's training in trusted roles. [REQ-7.2-10]

Findings with regard to ETSI EN 319 411-1:

6.5 Technical security controls

The TSP shall clarify the CA key generation script with the Trusted role personnel's tasks. [GEN-6.5.1-12]

The TSP shall improve the CA key generation report in compliance with the key generation procedure [GEN-6.5.1-12]

Findings with regard to ETSI EN 319 411-2:

6.5 Technical Security Controls

The TSP shall specify the CPS documentation section 6.2.1 with regards to the QSCD change policy. [SDP-6.5.1-7A]

For all non-conformities, remediation has been scheduled within three months after the onsite audit at latest and will be covered by a corresponding audit.

This Audit Attestation also covers the following incidents as documented under

- Bug 1680378, NETLOCK Incident description: Replacement of enduser certificates after the EVGL 1.7.4 self-audit

https://bugzilla.mozilla.org/show_bug.cgi?id=1680378

- Bug 1716874, NETLOCK: Incident description: CA Certificate Missing from Audit Reports

https://bugzilla.mozilla.org/show_bug.cgi?id=1716874

- Bug 1734114, NETLOCK Incident description: Problem with NETLOCK's codesigning CA

https://bugzilla.mozilla.org/show_bug.cgi?id=1734114

The remediation measures taken by NETLOCK Ltd. as described on Bugzilla (see link above) have been checked by the auditors and properly addressed the incident. The long-term effectiveness of the measures will be rechecked at the next regular audit.



Distinguished Name	SHA-256 fingerprint	Applied policy and OID
CN = NetLock Arany (Class Gold) Főtanúsítvány, O = NetLock Kft. C = HU	6C61DAC3A2DEF031506BE036D2A6FE401994FBD13DF9C8D466599274C446EC98	ETSI EN 319 411-1 V1.3.1, ETSI EN 319 411-2 V2.4.1, QCP-n; QCP-l; QCP-n-qscd; QCP-l-qscd; IVCP; OVCP; EVCP; LCP; NCP; NCP+; DVCP
CN = NetLock Platina (Class Platinum) Főtanúsítvány, O = NetLock Kft. C = HU	EB7E05AA58E7BD328A282BF8867033F3C035342B516EE85C01673DFFFFBFFE58	ETSI EN 319 411-1 V1.3.1, ETSI EN 319 411-2 V2.4.1, DVCP; QEVCP-w
CN = NETLOCK Root CA RSA4096, O = NetLock Kft. C = HU	92F0D139DC223E4C6AF7FC101637F642B9534F07C326860EADD7A65BD4DAF8A3	ETSI EN 319 411-1 V1.3.1, ETSI EN 319 411-2 V2.4.1, QCP-n; QCP-l; QCP-n-qscd; QCP-l-qscd; IVCP; OVCP; EVCP; LCP; NCP; NCP+; DVCP
CN = NETLOCK Root CA ECC, O = NetLock Kft. C = HU	CF1794A62DC233D6CFBBF09198322AB8899B0B3F493419ACA1DBFC0D562B9B5B	ETSI EN 319 411-1 V1.3.1, ETSI EN 319 411-2 V2.4.1, QCP-n; QCP-l; QCP-n-qscd; QCP-l-qscd; IVCP; OVCP; EVCP; LCP; NCP; NCP+; DVCP

Table 1: Root-CA in scope of the audit

The TSP named the Sub-CAs that have been issued by the aforementioned Root-CA, that are listed in the following table and that have been covered in this audit.

Distinguished Name	SHA-256 fingerprint	Applied policy and OID	EKU
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CN = NETLOCK Trust Advanced Plus CA, O = NetLock Kft. C = HU	F2603670BEDEAD1D977D6992FA6554E6CA595BC50F3B03F416DCF0F20DAC36C2	ETSI EN 319 411-1 V1.3.1 LCP	not defined
CN = NETLOCK Trust Advanced CA, O = NetLock Kft. C = HU	D82F87F93D31D5FC818DD66BD50E7F319AE179FC1C5D00547B658E8EB3F4CE56	ETSI EN 319 411-1 V1.3.1 LCP	not defined
CN = NETLOCK Trust CA, O = NetLock Kft. C = HU	58D7A197F09A6EA552B8EA6B1A53185A030A3AD8D52220C00C44E3F450E4FB90	ETSI EN 319 411-1 V1.3.1 LCP; NCP; NCP+	not defined
CN = NETLOCK Trust SSL CA, O = NetLock Kft. C = HU (revoked)	0A778BF9DD7F75B2F983FB7FA705C987CCCB5877404BE7EB5D8BA0B73545D0D9	ETSI EN 319 411-1 V1.3.1 IVCP; OVCP	not defined
CN = NETLOCK Trust EV CA, O = NetLock Kft. C = HU (revoked)	A476FE1FBFEBA08175A0C34807990B86E63B5AA2D6CE579C4F456C95575BB1F6	ETSI EN 319 411-1 V1.3.1 OVCP; EVCP	not defined
CN = NETLOCK Trust EV CA 2, O = NetLock Kft. C = HU (revoked)	CD0CC3A6F6857D427D6D98F6BF877E0845E365C5BAC61C9BAF27AE0AC3681A57	ETSI EN 319 411-1 V1.3.1 OVCP; EVCP	not defined
CN = NETLOCK Trust EV CA 3, O = NetLock Kft. C = HU	047795785CDCFF9E6E0AE122492E5B7BF08A9E5C49762E2BCB52747C69031561	ETSI EN 319 411-1 V1.3.1 OVCP; EVCP	1.3.6.1.5.5.7.3.1 (id-kpserverAuth) 1.3.6.1.5.5.7.3.2 (id-kpclientAuth)
CN = NetLock CodeSign CA, O = NetLock Kft. C = HU	C56F0F286618C1E7B0E112C97B9EE96FEB4D71E79496C151FA1FE8A8CEBD06CD	ETSI EN 319 411-1 V1.3.1 LCP; NCP; NCP+	not defined
CN = NETLOCK DVSSL CA, O = NetLock Kft.	F91606D1BC52C610136CAA856AB500C48C3B993BAC4808CD82BC4B78ABF24156	ETSI EN 319 411-1 V1.3.1 DVCP	1.3.6.1.5.5.7.3.1 (id-kpserverAuth)



C = HU			1.3.6.1.5.5.7.3.2 (id-kpclientAuth)
CN = NETLOCK Public Administration CA, O = NetLock Kft. C = hu	DB71EC6A5F220A7FB90FE0D18AAA0CFE16CFD0FA63F279DAC4FF3A73FC82C4A0	ETSI EN 319 411-1 V1.3.1 NCP+	not defined
CN = NETLOCK Trust Qualified QSCD CA, O = NetLock Kft. C = HU	9E4362A918A89009877C7B8B190E763AE012AD47C1CCA5FCCF166FC092BC2ADE	ETSI EN 319 411-2 V2.4.1 QCP-n-qscd; QCP-l-qscd	not defined
CN = NETLOCK Trust Qualified RQSCD CA, O = NetLock Kft. C = HU	A59F880816A50886D4D5996E64918DD9D401472AA685D28E7DECA5299F05FCE0	ETSI EN 319 411-2 V2.4.1 QCP-n-qscd; QCP-l-qscd	1.3.6.1.4.1.311.10.3.12 (12) 1.3.6.1.5.5.7.3.4 (id-kpemailProtection)
CN = NETLOCK Trust Qualified SCD CA, O = NetLock Kft. C = HU	7CE1DB7D16E9BFE80693214A3D7C6263AA24789E399017E69EDE4802ECF6F711	ETSI EN 319 411-2 V2.4.1 QCP-n; QCP-l	not defined
CN = NETLOCK Trust Qualified CA, O = NetLock Kft. C = HU	5498963DFFA651604F467E108E65A183470FA9B557C129DDF8C9D812B4F0BF96	ETSI EN 319 411-2 V2.4.1 QCP-n; QCP-l	not defined
CN = NETLOCK Trust Qualified EV CA, O = NetLock Kft. C = HU (revoked)	B0F25A6D9A96315C7CDAAE3E490E7BFA9FB17310B0701B7CD6FF432530837730	ETSI EN 319 411-1 V1.3.1 ETSI EN 319 411-2 V2.4.1 QEVCP-w	not defined
CN = NETLOCK Trust Qualified EV CA 2, O = NetLock Kft. C = HU (revoked)	36EFD13AE5DC6D01B6C1956841B45D18CE8085FBC197D90E8A8A21A9B01EBFBA	ETSI EN 319 411-1 V1.3.1 ETSI EN 319 411-2 V2.4.1 QEVCP-w	not defined



CN = NETLOCK Trust Qualified EV CA 3, O = NetLock Kft. C = HU	7ECACA4A3585A3B40E25574415512D56B57999B 753017856F2AB15FA1F21F6D0	ETSI EN 319 411-1 V1.3.1 ETSI EN 319 411-2 V2.4.1, QEVCP-w	1.3.6.1.5.5.7.3.1 (id- kpserverAuth) 1.3.6.1.5.5.7.3.2 (id- kpclientAuth)
CN = NETLOCK Qualified Public Administration CA, O = NetLock Kft. C = HU	9E48A8B70E6CF4CF7099DB8995EE9EF5179911D C8830369BF66518CD5FA8AC01	ETSI EN 319 411-2 V2.4.1 QCP-n; QCP-l; QCP-n-qscd; QCP-l-qscd	not defined
CN = NetLock Minősített Eat. (Class Q Legal) Tanúsítványkiadó, O = NetLock Kft. C = HU	6284A03BAFAE861A30E3A25A030428306F7EB52B D0BA577A1D962A809A830C9E	ETSI EN 319 411-2 V2.4.1 QCP-n; QCP-l; QCP-n-qscd; QCP-l-qscd	not defined
CN = NetLock Minősített Eat. Spec.(Class Q Legal Spec.) Tanúsítványkiadó, O = NetLock Kft. C = HU	A5F2FD0D66DB4DD77A2914ED3C747CBD97E734 CF4E2B6F217FB41AA4EAFDEAD2	ETSI EN 319 411-2 V2.4.1 QCP-n; QCP-l; QCP-n-qscd; QCP-l-qscd	not defined
CN = NetLock Közjegyzői Eat. (Class A Legal) Tanúsítványkiadó, O = NetLock Kft. C = HU	AD47883A48C86A3469E32C972B39A3EE155804D 32BF53FF002000BCA11D295D9	ETSI EN 319 411-1 V1.3.1, LCP	not defined
CN = NetLock Üzleti Eat. (Class B Legal) Tanúsítványkiadó, O = NetLock Kft. C = HU	1D93686CA42C70394FBDC2BC1F98461D19871C2 A00078B815499312ED9F6FE0C	ETSI EN 319 411-1 V1.3.1, LCP	not defined
CN = NetLock Expressz Eat. (Class C Legal)	BB661D750C53166181807A6898FD464065CE5929 8986AD66D9D6FFFCBBD4738A	ETSI EN 319 411-1 V1.3.1, LCP	not defined



Tanúsítványkiadó, O = NetLock Kft. C = HU			
CN = NetLock Közjegyzői (Class A) Tanúsítványkiadó, O = NetLock Kft. C = HU	75894D4C94C22D7296EE19FB447623258C2591B17031288BB386A20AA1F0E0A6	ETSI EN 319 411-1 V1.3.1, IVCP; OVCP	not defined
CN = NetLock Üzleti (Class B) Tanúsítványkiadó, O = NetLock Kft. C = HU	6B23FAD890180C337B864155DAE0DE9BAD9EF0BDA78D112F2CBDC3D02AD17956	ETSI EN 319 411-1 V1.3.1, IVCP; OVCP	not defined
CN = NetLock Expressz (Class C) Tanúsítványkiadó, O = NetLock Kft. C = HU	372B8F4CE73BEDFC88718C407BB6B3E6D8F9A79BE957190D0E7101C7B0EF9A32	ETSI EN 319 411-1 V1.3.1, IVCP; OVCP	not defined
CN = MKB Hitelesítő alegység 2, O = NetLock Kft. C = HU (revoked)	E53A9D8C0046C6366D3C6A18E23B4F4CBAAADB7D79B8C2F18786821DEE046AF3	ETSI EN 319 411-2 V2.4.1, QCP-n; QCP-I	not defined
CN = MKB SubCA 5, O = NetLock Kft. C = HU (renewed)	BC81F4A347BCBE1D53AF1C71B0D7E403246389D7465D5296D3B963AB208C2080	ETSI EN 319 411-2 V2.4.1, QCP-n; QCP-I	not defined
CN = MNB Hitelesítő Alegység 2. Eat., O = NetLock Kft. C = HU (expired)	878EF628267A15493D2BD9B1BA12311874680BD8E1C4F04A8B369241DB034DFA	ETSI EN 319 411-2 V2.4.1, QCP-n; QCP-I	not defined
CN = Keler Hitelesítő Alegység Eat., O = NetLock Kft. C = HU (revoked)	73C27704C3B312807D18155B3AD06907DC9A374B66FBEDC2BC2973031A6BE988	ETSI EN 319 411-2 V2.4.1, QCP-n; QCP-I	not defined



CN = NetLock Minositett Kozjegyzoi (Class QA) Tanúsítványkiadó, O = NetLock Kft. C = HU	E606DDEEE2EE7F5CDEF5D9058FF8B7D0A9F042 877F6A171ED8FF6960E4CC5EA5	ETSI EN 319 411-1 V1.3.1 LCP; NCP; NCP+	not defined
CN = MNB Hitelesítő Alegység 2., O = NetLock Kft. C = HU	4A3BB05DB15EE3BE9774206B8B6AFE229C6F7C8 7C3A5CFA08861568EBDCE7DB3	ETSI EN 319 411-2 V2.4.1, QCP-n; QCP-I	not defined
CN = Keler Hitelesítő Alegység Eat. O = NetLock Kft. C = HU (revoked)	E2723FB2591671774DE5EF80BEC656A7AF01F3B 24067AF269EE35301891AC51	ETSI EN 319 411-2 V2.4.1, QCP-n; QCP-I	not defined
CN = NetLock Kozjegyzoi (Class A) Tanusitvanykiado O = NetLock Halozatbiztonsagi Kft. C = HU (expired)	7F12CD5F7E5E290EC7D85179D5B72C20A5BE750 8FFDB5BF81AB9684A7FC9F667	ETSI EN 319 411-1 V1.3.1, LCP; NCP; NCP+; IVCP; OVCP	not defined
CN = NetLock Uzleti (Class B) Tanusitvanykiado O = NetLock Halozatbiztonsagi Kft. C = HU (expired)	39DF7B682B7B938F84715481CCDE8D60D8F22EC 598877D0AAAC12B59182B0312	ETSI EN 319 411-1 V1.3.1, LCP; NCP; NCP+; IVCP; OVCP	not defined
CN = NetLock Expressz (Class C) Tanusitvanykiado, O = NetLock Halozatbiztonsagi Kft. C = HU (expired)	0B5EED4E846403CF55E065848440ED2A82758BF 5B9AA1F253D4613CFA080FF3F	ETSI EN 319 411-1 V1.3.1, LCP; NCP; NCP+; IVCP; OVCP	not defined
CN = NetLock OnlineSSL (Class Online)	CC9F72544FF617C14CEBE828319A70F1E8981C F163D5A3FD8DCCFD846D5DC1A	ETSI EN 319 411-1 V1.3.1, DVCP	not defined



Tanúsítványkiadó, O = NetLock Kft. C = HU			
CN = NETLOCK Domain Validated CA, O = NETLOCK Ltd. C = HU	A1663E37B8992D819C69FB89707065CABDFE3D53C278FC3EC2601001798602F8	ETSI EN 319 411-1 V1.3.1, DVCP	not defined
CN = KGYHSZ (Public Administration Root CA - Hungary) C = hu	833492D73A6CF4E319C59F358D37DFB55198ED38A98890FE471091F4E3DF2720	0.2.216.1.100.42.1.200.2 cPSuri = http://cp.kgyhsz.gov.hu	not defined
CN = NetLock Minősített Közigazgatási (Class Q) Tanúsítványkiadó O = NetLock Kft. C = HU (expired)	EBA22784D20902A9F9AF3F640D14889A53D7F3C4B5B0697016B8D749ADE97F3E	ETSI EN 319 411-2 V2.4.1, QCP-n; QCP-l; QCP-n-qscd; QCP-l-qscd	not defined
CN = NetLock Közigazgatási (Class B) Tanúsítványkiadó O = NetLock Kft. C = HU (expired)	F7F8CD8A0BCFEF0376B4DE06904BD4F179BF3B54257FCF305CDCCF7ED7F3524	ETSI EN 319 411-1 V1.3.1, NCP+	not defined

Table 2: Sub-CA's issued by the Root-CA or its Sub-CA's in scope of the audit



Modifications record

Version	Issuing Date	Changes
Version 1	2022-08-31	Initial attestation
Version 2	2022-10-17	ALV clarifications

End of the audit attestation letter.