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To the Management of Telia Company AB

Amstelveen, 27 June 2022

Subject: Independent Auditor's Report WebTrust for CAs Baseline Requirements

We have been engaged, in a reasonable assurance engagement, to report on Telia Company AB's (Telia) management's assertion that for its Certification Authority (CA) operations in Finland and Sweden, throughout the period 1 April 2021 through 31 March 2022 for its CAs as enumerated in Attachment A, Telia has:

- disclosed its SSL certificate lifecycle management business practices in its:
 - Certificate Policy and Certification Practice Statement for Telia Client Certificates, version 3.2, dated October 2021
 - <u>Certificate Policy and Certification Practice Statement for Telia Server Certificates,</u> version 4.4, dated October 2021

including its commitment to provide SSL Certificates in conformity with the CA/Browser Forum Guidelines, as published on the Telia website, and provided such services in accordance with its disclosed practices

- maintained effective controls to provide reasonable assurance that:
 - the integrity of keys and SSL certificates it manages is established and protected throughout their lifecycles; and
 - SSL subscriber information is properly authenticated (for the registration activities performed by Telia)
- 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.



And, for its CAs as enumerated in Attachment A

- maintained effective controls to provide reasonable assurance that it meets the Network and Certificate System Security Requirements as set forth by the CA/Browser Forum in accordance with the WebTrust Principles and Criteria for Certification Authorities – SSL Baseline with Network Security v2.5.

Certification Authority's responsibilities

Telia' management is responsible for its assertion, including the fairness of its presentation, and the provision of its described services in accordance with the WebTrust Principles and Criteria for Certification Authorities – SSL Baseline with Network Security v2.5.

Our independence and quality control

We have complied with the independence and other ethical requirements of the *Code of Ethics* for *Professional Accountants* issued by the International Ethics Standards Board for Accountants, which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour. Therefore, we are independent of Telia and complied with other ethical requirements in accordance with the Code of Ethics of NOREA (IT Auditors Association in The Netherlands) and the Code of Ethics for Professional Accountants (a regulation with respect to independence) of the NBA, Royal Netherlands Institute of Chartered Accountants.

We apply the 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. We also apply the 'Reglement Kwaliteitsbeheersing NOREA' (RKBN, Regulations for Quality management systems) and, accordingly, maintain 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 (ISAE) 3000, Assurance Engagements Other than Audits or Reviews of Historical Financial Information, issued by the International Auditing and Assurance Standards Board and the related Dutch Directive 3000A 'Attestation engagements', as issued by NOREA.

These standards 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 Telia' SSL certificate lifecycle management business practices, including its relevant controls over the issuance, renewal, and revocation of SSL



certificates, and obtaining an understanding of Telia's network and certificate system security to meet the requirements set forth by the CA/Browser Forum;

- 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 Telia 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, Telia' 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.



Basis for qualified opinion

During our procedures, we noted the following that caused a qualification of our opinion:

	Observation	Relevant WebTrust Criteria
1	The Key Usage extension in the root CA certificates of <i>TeliaSonera Root CA v1</i> and <i>Sonera Class 2 CA</i> is not marked critical and <i>TeliaSonera Root CA v1</i> certificate's subject information does not include subject:countryName. This caused WebTrust Principles and Criteria for Certification Authorities – SSL Baseline with Network Security v2.3, Principle 2, Criterion 2.3 to not be met.	Principle 2, Criteria 2.3 The CA maintains controls to provide reasonable assurance that the extensions, key sizes, and certificate policy identifiers (including Reserved Certificate Policy Identifiers) of Root CA certificates generated conform to the Baseline
	However, Telia generated a new root CA, <i>Telia Root CA v2</i> , on 29 November 2018, which is planned to eventually replace <i>TeliaSonera Root CA v1</i> and <i>Sonera Class 2 CA</i> . Extensions, key sizes, and Certificate Policy Identifiers (including Reserved Certificate Policy Identifiers) of the new Telia Root CA v2 certificate conform to the Baseline Requirements.	Requirements

Qualified opinion

In our opinion, except for the matters described in the basis for qualified opinion section above, throughout the period 1 April 2021 through 31 March 2022, Telia has, in all material respects:

- disclosed its SSL certificate life cycle management business practices in its:
 - Certificate Policy and Certification Practice Statement for Telia Client Certificates, version 3.2, dated October 2021
 - <u>Certificate Policy and Certification Practice Statement for Telia Server Certificates</u>, version 4.4, dated October 2021

including its commitment to provide SSL certificates in conformity with the CA/Browser Forum Requirements on the Telia website, and provided such services in accordance with its disclosed practices

- maintained effective controls to provide reasonable assurance that:
 - the integrity of keys and SSL certificates it manages is established and protected throughout their lifecycles; and
 - SSL subscriber information is properly authenticated (for the registration activities performed by Telia)
- maintained effective controls to provide reasonable assurance that:
 - logical and physical access to CA systems and data is restricted to authorized individuals;



- o 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
- maintained effective controls to provide reasonable assurance that it meets the Network and Certificate System Security Requirements as set forth by the CA/Browser Forum.

in accordance with the <u>WebTrust Principles and Criteria for Certification Authorities – SSL</u> Baseline with Network Security v2.5.

This report does not include any representation as to the quality of Telia' services beyond those covered by the WebTrust Principles and Criteria for Certification Authorities – SSL Baseline with Network Security v2.5, nor the suitability of any of Telia' services for any customer's intended purpose.

Use of the WebTrust seal

Telia's use of the WebTrust Principles and Criteria for Certification Authorities – SSL Baseline with Network Security 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.

On behalf of KPMG Advisory N.V. Amstelveen, 27 June 2022

Original signed by

drs. ing. R.F. Koorn RE CISA Partner



Attachment A: List of CAs in scope
The following CAs were in scope of the WebTrust for CAs Baseline Requirements Audit:

CA #	Cert #	Subject	Issuer	Serial	Key Algorithm	Key Size	Digest Algorithm	Not Before	Not After	SKI	SHA2 Fingerprint	Other information
1	1	CN = TeliaSonera Root CA v1 O = TeliaSonera	Self-signed	0095BE16A0F 72E46F17B398 272FA8BCD96	RSA	4096 bits	sha1RSA	18 October 2007	18 October 2032	F08F593800B3F58 F9A960CD5EBFA7 BAA17E81312	DD6936FE21F8F077C123A1A 521C12224F72255B73E03A72 60693E8A24B0FA389	
1	2	CN = TeliaSonera Root CA v1 O = TeliaSonera	Sonera Class2 CA	87ED2E1A282 64AC519AA3A EBB90DA2CB	RSA	4096 bits	sha256RSA	5 December 2014	5 April 2021	F08F593800B3F58 F9A960CD5EBFA7 BAA17E81312	E9563581E712B290F23A7493 46535EB0D981E3D4A39D56D 604684CD0B1698C89	Cross-certificate, Expired 5 April 2021
2	1	CN = Sonera Class2 CA O = Sonera C = FI	Self-signed	1D	RSA	2048 bits	sha1RSA	16 April 2001	16 April 2021	4AA0AA5884D35E 3C	7908B40314C138100B518D07 35807FFBFCF8518A00953371 05BA386B153DD927	Expired 16 April 2021
3	1	CN = Telia Root CA v2 O = Telia Finland Oyj C = FI	Self-signed	01675F27D6F E7AE3E4ACB E095B059E	RSA	4096 bits	sha256RSA	29 November 2018	29 November 2043	72ACE43379AA45 87F6FDAC1D9ED6 C72F86D82439	242B69742FCB1E5B2ABF988 98B94572187544E5B4D99117 86573621F6A74B82C	
3	2	CN = Telia Root CA v2 O = Telia Finland Oyj C = FI	TeliaSonera Root CA v1	01675F82BE00 17DE8955A93 76EB1F9	RSA	4096 bits	sha256RSA	29 November 2018	18 October 2032	72ACE43379AA45 87F6FDAC1D9ED6 C72F86D82439	EF6F29F636F62BDD4753122F 41F3419EE7C2877587BE4A98 07ADF58946458E7F	Cross-certificate
4	1	CN = TeliaSonera Server CA v2 O = TeliaSonera C = FI	TeliaSonera Root CA v1	4C462AF6DBF BF7804F84C1 7CFEA972B6	RSA	4096 bits	sha256RSA	16 October 2014	16 October 2032	2F493C294FD7072 5F9C68CD564F56 63D12832295	D721110388CA6F20BBA9FD1 A8DBA4EFB8C16392A3DEBA D97C553EEAF0ACACAAC	

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CA #	Cert #	Subject	Issuer	Serial	Key Algorithm	Key Size	Digest Algorithm	Not Before	Not After	SKI	SHA2 Fingerprint	Other information
5	1	CN = TeliaSonera Gateway CA v2 O = TeliaSonera C = FI	TeliaSonera Root CA v1	00863C756411 95854FB43138 A0A0CF8AA3	RSA	4096 bits	sha256RSA	16 October 2014	16 October 2032	87AAE313129F118 BCA68CD1E2DC4 29A8FA101ACB	46226B7B89E02CA8F5D85D6 7ED8CB4B19C48382058BB16 242199D540CABE9268	Revoked (Cessation Of Operation) 28 April 2021
6	1	CN = Telia Domain Validation CA v3 O = Telia Finland Oyj C = FI	Telia Root CA v2	01675FFDE7E 41811E2CD76 B0CDB50A	RSA	4096 bits	sha256RSA	29 November 2018	29 November 2043	5BF1EE298D31B2 3B3AE017CBA407 E93F82421FA3	A7E83056E9B3D9DDB1816B9 5518F6A5E5A1DFDFA28F605 33B1C850855EAA4263	
7	1	CN = Telia Domain Validation CA v2 O = Telia Finland Oyj C = FI	TeliaSonera Root CA v1	016584E34A38 D9E963EBEED 2174784	RSA	4096 bits	sha256RSA	29 August 2018	18 October 2032	ED3D749C2C53BB 71937B4B11F6B89 1E282F992DB	5B312B7E11B70D07C14E0AB 99F08D00748966098C52AA85 A06A0822BBE59A02C	
8	1	CN = Telia Server CA v3 O = Telia Finland Oyj C = FI	Telia Root CA v2	01675FE78F10 F349257F16B3 731F7A	RSA	4096 bits	sha256RSA	29 November 2018	29 November 2043	46668D0E072316B 0EA4F05EB965AD EA5EEC97EA4	1281AD8FABE883F209E96364 48D1A80C373DAA7686C813A 270FAD48F5F5E589A	
9	1	CN = TeliaSonera Class 1 CA v2 O = TeliaSonera C = FI	TeliaSonera Root CA v1	00FD41DD7FD 19F3EE9F85D 9E437133D4D B	RSA	4096 bits	sha256RSA	16 October 2014	16 October 2032	D147228FCBA85D 1AFE2641466ECB 824B657D8AE4	B95AE54F838E3ABF0B57ACC C1B1266DC68C7A3FA774015 FA128D60CDD1AAE280	

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CA #	Cert #	Subject	Issuer	Serial	Key Algorithm	Key Size	Digest Algorithm	Not Before	Not After	SKI	SHA2 Fingerprint	Other information
10	1	CN = TeliaSonera Class 2 CA v2 O = TeliaSonera C = SE	TeliaSonera Root CA v1	637C0BD785A 5BF29DA602D 7C4D7A70B1	RSA	4096 bits	sha256RSA	16 October 2014	16 October 2032	9E19FFE50D3AFE 0097153F69F1DC5 A3CAA0C9483	092829433D231949F4A9BC66 6CBF54B3AA27D7BEBCA048 D75E59093E15A72EA5	
11	1	CN = TeliaSonera Email CA v4 O = TeliaSonera C = SE	TeliaSonera Root CA v1	52EBA0D8B74 B46EB8557CD 6DA2A3DDDD	RSA	4096 bits	sha256RSA	16 October 2014	16 October 2032	89862A82D178FAF 0A629543587956F D3776019F0	D1F2656AC8382739A3B087C 47AB5CAB945A32F162B6149 C308783C7E06AF8AE8	

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Attachment B: Publicly disclosed incidents

#	Disclosure	Publicly Disclosed Link
1	Invalid email contact address was used for few domains	Bugzilla Ticket Link
2	Delayed revocation of 5 EE certificates in connection to id=1736020	Bugzilla Ticket Link
3	Issued three pre-certificates with non-NIST EC curve	Bugzilla Ticket Link



TELIA'S MANAGEMENT'S ASSERTION

Telia Company AB (Telia) operates the Certificate Authority (CA) services as listed in Attachment A, and provides SSL services.

The management of Telia has assessed its disclosure of its certificate practices and controls over its SSL CA services. During our assessment, we noted the following deviation which caused the relevant criteria to not be met:

Observation

The Key Usage extension in the root CA certificates of TeliaSonera Root CA v1 and Sonera Class 2 CA is not marked critical and TeliaSonera Root CA v1 certificate's subject information does not include subject:countryName. This caused WebTrust Principles and Criteria for Certification Authorities – SSL Baseline with Network Security v2.3, Principle 2, Criterion 2.3 to not be met.

However, Telia generated a new root CA, *Telia Root CA v2*, on 29 November 2018, which is planned to eventually replace *TeliaSonera Root CA v1* and *Sonera Class 2 CA*. Extensions, key sizes, and certificate policy identifiers (including Reserved Certificate Policy Identifiers) of the new Telia Root CA v2 certificate conform to the Baseline Requirements.

Relevant WebTrust Criteria

Principle 2, Criteria 2.3

The CA maintains controls to provide reasonable assurance that the extensions, key sizes, and certificate policy identifiers (including Reserved Certificate Policy Identifiers) of Root CA certificates generated conform to the Baseline Requirements

Based on that assessment, in Telia management's opinion, except for the matters as described in the preceding table, in providing its SSL and non-SSL Certification Authority (CA) services in Finland and Sweden, throughout the period 1 April 2021 to 31 March 2022, Telia has:

- disclosed its SSL certificate life cycle management business practises in its:
 - <u>Certificate Policy and Certification Practice Statement for Telia Client Certificates,</u> version 3.2, dated October 2021
 - <u>Certificate Policy and Certification Practice Statement for Telia Server Certificates,</u> version 4.4, dated October 2021

including its commitment to provide SSL certificates in conformity with the CA/Browser Forum Requirements on the Telia website, and provided such services in accordance with its disclosed practices

- maintained effective controls to provide reasonable assurance that:
 - the integrity of keys and SSL certificates it manages is established and protected throughout their lifecycles; and
 - SSL subscriber information is properly authenticated (for the registration activities performed by Telia)



- maintained effective controls to provide reasonable assurance that:
 - logical and physical access to CA systems and data is restricted to authorized individuals;
 - o 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
- maintained effective controls to provide reasonable assurance that it meets the Network and Certificate System Security Requirements as set forth by the CA/Browser Forum

in accordance with the <u>WebTrust Principles and Criteria for Certification Authorities – SSL</u> Baseline with Network Security v2.5.

Helsinki, 27 June 2022

Telia Company AB

Original signed by

Tomi Hautala

Head of Trust Services



Attachment A: List of CAs in scope

The following CAs were in scope for the SSL Baseline Requirements and Network Security Requirements:

	Cert #	Subject	Issuer	Serial	Key Algorithm	Key Size	Digest Algorithm	Not Before	Not After	SKI	SHA2 Fingerprint	Other information
1	1	CN = TeliaSonera Root CA v1 O = TeliaSonera	Self-signed	0095BE16A0F 72E46F17B398 272FA8BCD96	RSA	4096 bits	sha1RSA	18 October 2007	18 October 2032	F08F593800B3F58 F9A960CD5EBFA7 BAA17E81312	DD6936FE21F8F077C 123A1A521C12224F72 255B73E03A7260693E 8A24B0FA389	
1	2	CN = TeliaSonera Root CA v1 O = TeliaSonera	Sonera Class2 CA	87ED2E1A282 64AC519AA3A EBB90DA2CB	RSA	4096 bits	sha256RSA	5 December 2014	5 April 2021	F08F593800B3F58 F9A960CD5EBFA7 BAA17E81312	E9563581E712B290F2 3A749346535EB0D981 E3D4A39D56D604684 CD0B1698C89	Cross-certificate, Expired 5 April 2021
2	1	CN = Sonera Class2 CA O = Sonera C = FI	Self-signed	1D	RSA	2048 bits	sha1RSA	16 April 2001	16 April 2021	4AA0AA5884D35E 3C	7908B40314C138100B 518D0735807FFBFCF 8518A0095337105BA3 86B153DD927	Expired 16 April 2021
3	1	CN = Telia Root CA v2 O = Telia Finland Oyj C = FI	Self-signed	01675F27D6F E7AE3E4ACB E095B059E	RSA	4096 bits	sha256RSA	29 November 2018	29 November 2043	72ACE43379AA45 87F6FDAC1D9ED6 C72F86D82439	242B69742FCB1E5B2 ABF98898B945721875 44E5B4D99117865736 21F6A74B82C	
3	2	CN = Telia Root CA v2 O = Telia Finland Oyj C = FI	TeliaSonera Root CA v1	01675F82BE00 17DE8955A93 76EB1F9	RSA	4096 bits	sha256RSA	29 November 2018	18 October 2032	72ACE43379AA45 87F6FDAC1D9ED6 C72F86D82439	EF6F29F636F62BDD4 753122F41F3419EE7C 2877587BE4A9807AD F58946458E7F	Cross-certificate
4	1	CN = TeliaSonera Server CA v2 O = TeliaSonera C = FI	TeliaSonera Root CA v1	4C462AF6DBF BF7804F84C1 7CFEA972B6	RSA	4096 bits	sha256RSA	16 October 2014	16 October 2032	2F493C294FD7072 5F9C68CD564F56 63D12832295	D721110388CA6F20B BA9FD1A8DBA4EFB8 C16392A3DEBAD97C5 53EEAF0ACACAAC	
5	1	CN = TeliaSonera Gateway CA v2 O = TeliaSonera C = FI	TeliaSonera Root CA v1	00863C756411 95854FB43138 A0A0CF8AA3	RSA	4096 bits	sha256RSA	16 October 2014	16 October 2032	87AAE313129F118 BCA68CD1E2DC4 29A8FA101ACB	46226B7B89E02CA8F 5D85D67ED8CB4B19C 48382058BB16242199 D540CABE9268	Revoked (Cessation Of Operation) 28 April 2021
6	1	CN = Telia Domain Validation CA v3	Telia Root CA v2	01675FFDE7E 41811E2CD76 B0CDB50A	RSA	4096 bits	sha256RSA	29 November 2018	29 November 2043	5BF1EE298D31B2 3B3AE017CBA407 E93F82421FA3	A7E83056E9B3D9DDB 1816B95518F6A5E5A1 DFDFA28F60533B1C8 50855EAA4263	



CA #	Cert #	Subject	Issuer	Serial	Key Algorithm	Key Size	Digest Algorithm	Not Before	Not After	SKI	SHA2 Fingerprint	Other information
		O = Telia Finland Oyj C = FI										
7	1	CN = Telia Domain Validation CA v2 O = Telia Finland Oyj C = FI	TeliaSonera Root CA v1	016584E34A38 D9E963EBEED 2174784	RSA	4096 bits	sha256RSA	29 August 2018	18 October 2032	ED3D749C2C53BB 71937B4B11F6B89 1E282F992DB	5B312B7E11B70D07C 14E0AB99F08D007489 66098C52AA85A06A08 22BBE59A02C	
8	1	CN = Telia Server CA v3 O = Telia Finland Oyj C = FI	Telia Root CA v2	01675FE78F10 F349257F16B3 731F7A	RSA	4096 bits	sha256RSA	29 November 2018	29 November 2043	46668D0E072316B 0EA4F05EB965AD EA5EEC97EA4	1281AD8FABE883F20 9E9636448D1A80C373 DAA7686C813A270FA D48F5F5E589A	
9	1	CN = TeliaSonera Class 1 CA v2 O = TeliaSonera C = FI		00FD41DD7FD 19F3EE9F85D 9E437133D4D B	RSA	4096 bits	sha256RSA	16 October 2014	16 October 2032	D147228FCBA85D 1AFE2641466ECB 824B657D8AE4	B95AE54F838E3ABF0 B57ACCC1B1266DC68 C7A3FA774015FA128 D60CDD1AAE280	
10	1	CN = TeliaSonera Class 2 CA v2 O = TeliaSonera C = SE		637C0BD785A 5BF29DA602D 7C4D7A70B1	RSA	4096 bits	sha256RSA	16 October 2014	16 October 2032	9E19FFE50D3AFE 0097153F69F1DC5 A3CAA0C9483	092829433D231949F4 A9BC666CBF54B3AA2 7D7BEBCA048D75E59 093E15A72EA5	
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3	Issued three precertificates with non-NIST EC curve	Bugzilla Ticket Link