

## INDEPENDENT ACCOUNTANT'S REPORT

To the management of Microsoft Public Key Infrastructure Services ("MS PKI Services"):

### Scope

We have examined MS PKI Services management's [assertion](#) that for its Certification Authority ("CA") operations in the United States of America, and in Ireland, for CAs as enumerated in [Attachment A](#), MS PKI Services has:

- 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

throughout the period May 1, 2024 to April 30, 2025 based on the [WebTrust Principles and Criteria for Certification Authorities – Network Security, v1.7](#).

There are other CA hierarchies and PKI operations across Microsoft that are not managed by MS PKI services. These CA hierarchies and PKI operations are not in the scope of this examination, and this opinion does not extend to these services.

### Certification authority's responsibilities

MS PKI Services' 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 – Network Security, v1.7.

### Practitioner's responsibilities

Our responsibility is to express an opinion, based on our examination. Our examination was conducted in accordance with AT-C Section 205, *Assertion-Based Examination Engagements*, established by the American Institute of Certified Public Accountants, and International Standard on Assurance Engagements ("ISAE") 3000, *Assurance Engagements Other Than Audits Or Reviews Of Historical Financial Information*. Those standards require that we plan and perform our examination to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects. An examination involves performing procedures to obtain evidence about management's assertion. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of management's assertion, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

### Our independence and quality control

We are required to be independent and to meet other ethical responsibilities in accordance with the Code of Professional Conduct established by the American Institute of Certified Public Accountants ("AICPA") and Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board of Accountants' ("IESBA"). We have complied with those requirements. We applied the Statements on Quality Control Standards established by the AICPA and the International Standards on Quality Management issued by the International Auditing and Assurance Standards Board ("IAASB") and, accordingly, maintain a comprehensive system of quality control.

### Relative effectiveness of controls

The relative effectiveness and significance of specific controls at MS PKI Services 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. Our examination did not extend to controls at individual subscriber and relying party locations and we have not evaluated the effectiveness of such controls.

### Inherent limitations

There are inherent limitations in the effectiveness of any system of internal control, including the possibility of human error and the circumvention of controls. For example, because of their nature, controls may not prevent, or detect unauthorised access to systems and information, or failure to comply with internal and external policies or requirements. Also, the projection to the future of any conclusions based on our findings is subject to the risk that controls may become ineffective.

### Emphasis of matters

Without modifying our opinion, we noted the following other matters during our procedures:

Matter topic	Matter description
<p><b>1 Vulnerability Management Exception Tracking</b></p>	<p>As publicly disclosed in Bugzilla <a href="#">1906028</a>, the auditors issued a qualified opinion for the audit period that ended March 31, 2024, citing deficiencies in the documentation of vulnerability mitigation plans and timelines within the Microsoft PKI Services Vulnerability Management process.</p> <p>As of August 6, 2024, the CA remediated the observation noted by implementing controls to provide reasonable assurance that it performs the vulnerability correction process within ninety-six (96) hours of the discovery of a critical vulnerability not previously addressed by the CA’s vulnerability correction process. For the period from August 7, 2024, to April 30, 2025, the CA maintained sufficient controls to provide reasonable assurance that the Network and Certificate System Security Requirements for Principle 4 Criterion 4.6 as set forth by the CA/Browser Forum were achieved.</p> <p>The Bugzilla ticket was RESOLVED on August 15, 2024.</p> <p>We examined that MS PKI Services maintained effective controls to provide reasonable assurance that it meets the Network and Certificate System Security Requirements for Principle 4 Criterion 4.6 as set forth by the CA/Browser Forum throughout the period May 1, 2024 to October 31, 2024 based on the WebTrust Principles and Criteria for Certification Authorities – Network Security, v1.7, and provided an independent accountant’s report with our opinion on February 12, 2025.</p>

**Opinion**

In our opinion MS PKI Services’ assertion, as referred to above, is fairly stated, in all material respects.

This report does not include any representation as to the quality of MS PKI Services’ services other than its CA operations in the United States of America, and in Ireland, nor the suitability of any of MS PKI Services’ services for any customer's intended purpose.

**Use of the WebTrust seal**

MS PKI Services’ use of the WebTrust for Certification Authorities – 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.

*Deloitte & Touche LLP*

Deloitte & Touche LLP  
July 16, 2025

**ATTACHMENT A**

**LIST OF IN SCOPE CAs**

<b>Root CAs</b>
<ol style="list-style-type: none"><li>1. AP Root Certificate Authority 2014</li><li>2. Azure Hardware Root Certificate Authority 2019</li><li>3. Azure Sphere Root Certificate Authority 2020</li><li>4. Microsoft Android Platform Root CA 2021</li><li>5. Microsoft Code Verification Root</li><li>6. Microsoft Corporation Third Party Marketplace Root</li><li>7. Microsoft Development Root Certificate Authority 2014</li><li>8. Microsoft ECC Development Root Certificate Authority 2018</li><li>9. Microsoft ECC Devices Root CA 2023</li><li>10. Microsoft ECC Devices Root Certificate Authority 2017</li><li>11. Microsoft ECC Services Root CA 2021</li><li>12. Microsoft ESRP Root Certificate Authority 2017</li><li>13. Microsoft Mariner RSA Root CA 2023</li><li>14. Microsoft Mobile Root Certificate Authority 2015</li><li>15. Microsoft Overlake Root Certificate Authority 2019</li><li>16. Microsoft RSA Devices Root CA 2021</li><li>17. Microsoft RSA Devices Root CA 2023</li><li>18. Microsoft RSA Services Root CA 2021</li><li>19. Microsoft Services Federal Root 1</li><li>20. Microsoft Services Partner Root</li><li>21. Microsoft Supply Chain ECC Root CA 2022</li><li>22. Microsoft Supply Chain RSA Root CA 2022</li><li>23. Microsoft Surface Device Authentication Root CA 2014</li><li>24. Microsoft TPM Root Certificate Authority 2014</li></ol>
<b>Intermediate CAs</b>
<ol style="list-style-type: none"><li>25. Azure RSA PS CA EOC CA 01</li><li>26. Azure RSA PS CA EOC CA 02</li><li>27. Azure RSA PS CS AOC CA 01</li><li>28. Azure RSA PS CS AOC CA 02</li><li>29. Azure RSA PS CS EOC CA 01</li><li>30. Azure RSA PS CS EOC CA 02</li><li>31. Azure RSA Public Services Code Signing PCA</li><li>32. Azure Services Linux Kmod PCA</li><li>33. ESRP0 RSA PCA 2017</li><li>34. ESRP2 RSA PCA 2017</li><li>35. IDNA SK PCA</li><li>36. J2ME Manufacturer Domain CA 2015</li><li>37. J2ME Trusted Third Party Domain CA 2015</li><li>38. Linux Boot Loader Signing CA 2016</li><li>39. Lumia Labeling CA</li><li>40. M365 RSA Services Code Signing PCA</li><li>41. Mariner Trusted Base RSA Code Signing CA</li><li>42. Microsoft Android Code Transparency and Upload PCA</li><li>43. Microsoft Android Play App PCA</li><li>44. Microsoft Andromeda Attestation CA 2017</li><li>45. Microsoft Andromeda Attestation PCA 2017</li><li>46. Microsoft Andromeda Firmware Debug CA 2017</li><li>47. Microsoft Atlas Attestation CA 2020</li><li>48. Microsoft Atlas Attestation PCA 2020</li><li>49. Microsoft Atlas Firmware Debug CA 2020</li><li>50. Microsoft Band Firmware CA 2015</li><li>51. Microsoft Band Firmware Debug CA 2016</li><li>52. Microsoft Benham Attestation CA</li></ol>

53. Microsoft Benham Attestation PCA
54. Microsoft Cerberus AOC CA 01
55. Microsoft Cerberus AOC CA 02
56. Microsoft Cerberus EOC CA 01
57. Microsoft Cerberus EOC CA 02
58. Microsoft Cloud Server AOC CA 01
59. Microsoft Cloud Server AOC CA 02
60. Microsoft Cloud Server EOC CA 01
61. Microsoft Cloud Server EOC CA 02
62. Microsoft Corporation KEK 2K CA 2023
63. Microsoft Corporation KEK 3K CA 2023
64. Microsoft Corporation KEK 4K CA 2023
65. Microsoft Corporation KEK CA 2011
66. Microsoft Corporation Third Party Marketplace PCA
67. Microsoft Corporation UEFI CA 2011
68. Microsoft Corsica AOC CA 01
69. Microsoft Corsica AOC CA 02
70. Microsoft Corsica EOC CA 01
71. Microsoft Corsica EOC CA 02
72. Microsoft Development PCA 2014
73. Microsoft Devices OEM Code Sign CA 2018
74. Microsoft Devices UEFI CA 2016
75. Microsoft ECC Development PCA 2018
76. Microsoft ECC LFF Platform Attestation CA
77. Microsoft ECC LFF Platform Attestation PCA
78. Microsoft ECC NFF Platform Attestation CA
79. Microsoft ECC NFF Platform Attestation PCA
80. Microsoft ECC Surface Accessory Firmware CA 2018
81. Microsoft ECC Surface Accessory Firmware CA 2023
82. Microsoft ECC Third Party PCA 2019
83. Microsoft HoloLens Attestation CA 2018
84. Microsoft HoloLens Attestation PCA 2018
85. Microsoft HoloLens Firmware Debug CA 2018
86. Microsoft IDNA RSA Policy Signing CA
87. Microsoft IoT Hardware AOC CA 01
88. Microsoft IoT Hardware AOC CA 02
89. Microsoft IoT Hardware EOC CA 01
90. Microsoft IoT Hardware EOC CA 02
91. Microsoft Mobile Development PCA 2014
92. Microsoft Mobile PCA 2015
93. Microsoft OEM Custom CA 2014
94. Microsoft Option ROM UEFI CA 2023
95. Microsoft Overlake Agent Signing PCA 2019
96. Microsoft Overlake Celestial Peak AOC CA 01
97. Microsoft Overlake Celestial Peak AOC CA 02
98. Microsoft Overlake Celestial Peak EOC CA 01
99. Microsoft Overlake Celestial Peak EOC CA 02
100. Microsoft Overlake OS Signing PCA 2019
101. Microsoft Overlake Policy Signing PCA 2020
102. Microsoft Overlake STOS Signing PCA 2020
103. Microsoft Pinewood Attestation CA 2019
104. Microsoft Pinewood Attestation PCA 2019
105. Microsoft RSA Third Party PCA 2023
106. Microsoft SCD Claimants RSA CA
107. Microsoft SCD Products RSA CA
108. Microsoft SCD Systems RSA CA
109. Microsoft Secure Launch ECC PCA 2017
110. Microsoft Services Federal PCA 1

111. Microsoft SH2 Firmware CA 2018
112. Microsoft SH2 Firmware Debug CA 2018
113. Microsoft Surface Accessories Windows Firmware CA 2013
114. Microsoft Surface AFF Firmware CA 2021
115. Microsoft Surface AFF Firmware Debug CA 2021
116. Microsoft Surface AFF UEFI PK CA 2021
117. Microsoft Surface Common Services CA 2014
118. Microsoft Surface FFF Firmware CA 2018
119. Microsoft Surface FFF Firmware Debug CA 2018
120. Microsoft Surface for RT Firmware CA 2012
121. Microsoft Surface for Windows 8 Pro Firmware CA 2012
122. Microsoft Surface for Windows RT CA 2012
123. Microsoft Surface for Windows RT EK Issuing CA 01
124. Microsoft Surface for Windows RT EK Issuing CA 02
125. Microsoft Surface for Windows RT EK Issuing CA 03
126. Microsoft Surface for Windows RT EK Issuing CA 04
127. Microsoft Surface Ganymede Attestation CA 2017
128. Microsoft Surface Ganymede Attestation PCA 2017
129. Microsoft Surface Hub Firmware CA 2015
130. Microsoft Surface Hub UEFI PK CA 2015
131. Microsoft Surface LFF 3 Firmware CA 2016
132. Microsoft Surface LFF 3 Firmware Debug CA 2016
133. Microsoft Surface LFF 3 UEFI PK CA 2016
134. Microsoft Surface LFF Firmware CA 2021
135. Microsoft Surface LFF Firmware Debug CA 2021
136. Microsoft Surface LFF UEFI PK CA 2021
137. Microsoft Surface MoBB-1 Boot Core CA 2019
138. Microsoft Surface MoBB-1 CA 2014
139. Microsoft Surface NFF Firmware CA 2015
140. Microsoft Surface NFF Firmware CA 2021
141. Microsoft Surface NFF Firmware Debug CA 2015
142. Microsoft Surface NFF Firmware Debug CA 2021
143. Microsoft Surface NFF UEFI PK CA 2015
144. Microsoft Surface NFF UEFI PK CA 2021
145. Microsoft Surface Services for Windows 8 Pro CA 2012
146. Microsoft Surface Services for Windows RT CA 2012
147. Microsoft Surface SFF Attestation CA 2013
148. Microsoft Surface SFF Firmware CA 2013
149. Microsoft Surface SFF Platform Key CA 2013
150. Microsoft Surface SH2 Firmware CA 2022
151. Microsoft Surface SH2 Firmware Debug CA 2022
152. Microsoft Surface SH2 UEFI PK CA 2022
153. Microsoft Surface Silicon Partner PCA 2018
154. Microsoft Surface Stamps CA 2024
155. Microsoft Surface with Windows RT v2 Boot ROM Fuse CA 2013
156. Microsoft Surface with Windows RT v2 Firmware CA 2013
157. Microsoft Surface with Windows RT v2 Platform Key CA 2013
158. Microsoft Surface with Windows RT v2 Services Mobile CA 2013
159. Microsoft Surface XLFF 2 Firmware CA 2016
160. Microsoft Surface XLFF 2 Firmware Debug CA 2016
161. Microsoft Surface XLFF 2 UEFI PK CA 2016
162. Microsoft Surface XLFF Firmware CA 2021
163. Microsoft Surface XLFF Firmware Debug CA 2021
164. Microsoft Surface XLFF UEFI PK CA 2021
165. Microsoft Surface XSFF Firmware CA 2018
166. Microsoft Surface XSFF Firmware Debug CA 2018
167. Microsoft Surface XSFF UEFI PK CA 2018
168. Microsoft UEFI CA 2023

169. Microsoft Universal Store OnePay PCA 2015
170. Microsoft VSMC PCA 2017
171. Microsoft Windows Group Edition KEK CA 2015
172. Microsoft Windows IoT KEK CA 2015
173. Microsoft Windows IoT PCA 2015
174. Microsoft Windows UEFI PK CA 2017
175. Microsoft XCloud PCA 2018
176. MR0 RSA PCA 2022
177. MR1 RSA PCA 2022
178. Phones UEFI CA 2016
179. Surface Factory CA 2018
180. Windows Hello 11B0C61D CA 2021
181. Windows Hello 1767C8B4 CA 2018
182. Windows Hello 19B92965 CA 2018
183. Windows Hello 2096ADCC CA 2021
184. Windows Hello 41738710 CA 2021
185. Windows Hello 5CF190F8 CA 2018
186. Windows Hello 73CA926A CA 2021
187. Windows Hello 7BB5EEFC CA 2018
188. Windows Hello 9F10CB1F CA 2021
189. Windows Hello B5A8CEAC CA 2018
190. Windows Hello FPR-I-256 CA 2023
191. Windows Hello GD-256 CA 2023
192. Windows Hello Secure Devices PCA 2018
193. Windows Phone KEK CA 2012
194. Microsoft ID Verified C2PA CA 2024
195. Microsoft ID Verified C2PA ICA AOC 01
196. Microsoft ID Verified C2PA ICA AOC 02
197. Microsoft ID Verified C2PA ICA EOC 01
198. Microsoft ID Verified C2PA ICA EOC 02
199. Microsoft RSA Document Signing CA 2023

## MICROSOFT PUBLIC KEY INFRASTRUCTURE SERVICES MANAGEMENT'S ASSERTION

Microsoft Public Key Infrastructure Services ("MS PKI Services") operates the Certification Authority ("CA") services as enumerated in [Attachment A](#).

The management of MS PKI Services is responsible for establishing and maintaining effective controls over its CA operations, including its network and certificate security system 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 MS PKI Services' CA operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

MS PKI Services management has assessed its controls over its CA services. Based on that assessment, in providing its Certification Authority (CA) services at United States of America and Ireland, MS PKI Services has:

- 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

throughout the period May 1, 2024 to April 30, 2025 based on the [WebTrust Principles and Criteria for Certification Authorities – Network Security, v1.7](#).

Microsoft Public Key Infrastructure Services  
July 16, 2025

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146. Microsoft Surface Services for Windows RT CA 2012
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