

# TLS BR Audit Attestation for Buypass AS

**Reference: 2024.ETS-053-018.TLS-BR**

Amsterdam, 2025-01-28

To whom it may concern,

This is to confirm that BSI Group The Netherlands B.V has audited the CAs of Buypass AS without critical findings.

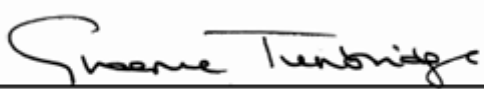
This present Audit Attestation Letter is registered under the unique identifier number 2024.ETS-053-018.TLS-BR covers multiple Root-CAs and consists of 10 pages.

Kindly find here below the details accordingly.

In case of any question, please contact:

In case of any question, please contact:  
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Phone: +31 20 3460780

With best regards,



Graeme Tunbridge, Senior Vice President Global Regulatory & Quality

## General audit information

### Identification of the conformity assessment body (CAB) and assessment organization acting as ETSI auditor

- BSI Group The Netherlands B.V, John M. Keynesplein 9, 1066 EP Amsterdam, Netherlands, registered under trade registration number 33264284
- Accredited by Dutch Accreditation Council (RvA) under C646<sup>1</sup> for the certification of trust services according to “EN ISO/IEC 17065:2012” and “ETSI EN 319 403-1 V2.3.1 (2020-06)”.
- Insurance Carrier (BRG section 8.2):  
Marsh Ltd is providing the professional liability insurance coverage.
- Third-party affiliate audit firms involved in the audit:  
None.

### Identification and qualification of the audit team

- Number of team members: 2
- Academic qualifications of team members:  
All team members have formal academic qualifications or 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.
- Additional competences of team members:
- All team members have knowledge of
  - 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.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.
- 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:
  - 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

<sup>1</sup> <https://www.rva.nl/en/alle-geaccrediteerden/c646/>

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| <p>f) knowledge of security policies and controls.</p> <ul style="list-style-type: none"> <li>Types of professional experience and practical audit experience:<br/>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 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.</li> <li>Additional qualification and experience Lead Auditor:<br/>On top of what is required for team members (see above), the Lead Auditor             <ul style="list-style-type: none"> <li>a) has acted as auditor in at least three complete TSP audits;</li> <li>b) has adequate knowledge and attributes to manage the audit process; and</li> <li>c) has the competence to communicate effectively, both orally and in writing.</li> </ul> </li> <li>Special skills or qualifications employed throughout audit:<br/>None.</li> <li>Special Credentials, Designations, or Certifications:<br/>All members are qualified and registered assessors within the accredited CAB.</li> <li>Auditors code of conduct incl. independence statement:<br/>Code of Conduct as of Annex A, ETSI EN 319 403 or ETSI EN 319 403-1 respectively.</li> </ul> |
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Identification and qualification of the reviewer performing audit quality management

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| <ul style="list-style-type: none"> <li>Number of Reviewers/Audit Quality Managers involved independent from the audit team: 1</li> <li>The reviewer fulfils the requirements as described for the Audit Team Members above and has acted as an auditor in at least three complete CA/TSP audits.</li> </ul> |
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| Identification of the CA / Trust Service Provider (TSP): | Buypass AS, Gullhaug Torg 2D, 0484 Oslo, Norway, registered under NO 983 163 327 |
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| Type of audit:                         | <input type="checkbox"/> Point in time audit<br><input type="checkbox"/> Period of time, after x month of CA operation<br><input checked="" type="checkbox"/> Period of time, full audit |
| Audit period covered for all policies: | 2023-11-01 to 2024-10-31   |
| Point in time date:                    | none, as audit was a period of time audit  |
| Audit dates:                           | 2024-09-09 to 2024-09-13 (on site)<br>2024-10-14 to 2024-10-18 (remote)<br>2024-11-11 to 2024-11-14 (on site)<br>2024-11-25 to 2024-11-29 (on site)                                      |
| Audit location:                        | Oslo and Gjøvik, Norway  |

## Root 1: Buypass Class 2 Root CA

|                       |  |
|-----------------------|--|
| Standards considered: | <p>European Standards:</p> <ul style="list-style-type: none"><li>• ETSI EN 319 411-1 V1.4.1 (2023-10)</li><li>• ETSI EN 319 401 V2.3.1 (2021-05)</li></ul> <p>CA Browser Forum Requirements:</p> <ul style="list-style-type: none"><li>• Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates, version 2.0.7</li><li>• Network and Certificate System Security Requirements, version 1.7</li></ul> <p>Browser Policy Requirements:</p> <ul style="list-style-type: none"><li>• Mozilla Root Store Policy, version 2.9</li><li>• Microsoft Trusted Root Program, Program Requirements</li><li>• Google Chrome Root Program Policy, Version 1.5</li><li>• Apple Root Certificate Program</li></ul> <p>Other:</p> <ul style="list-style-type: none"><li>• None</li></ul> <p>For the Trust Service Provider Conformity Assessment:</p> <ul style="list-style-type: none"><li>• ETSI EN 319 403-1 V2.3.1 (2020-06)</li><li>• ETSI TS 119 403-2 V1.3.1 (2023-03)</li></ul> |
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The audit was based on the following policy and practice statement documents of the CA / TSP:

- Certification Practice Statement - Buypass Class 2 SSL Certificates v13.6, dated: 2024-01-26 (effective date: 2024-01-26)
- Certification Practice Statement - Buypass ACME Certificates v5.5, dated: 2024-01-26 (effective date: 2024-01-26)

No major or minor non-conformities have been identified during the audit.

Findings with regard to ETSI EN 319 401:

None

Findings with regard to ETSI EN 319 411-1:

None.

Findings with regard to ETSI EN 319 411-2:

None.

This Audit Attestation also covers the following incidents as described in the following.

- Bug 1838421 "Buypass: Domain validation using not allowed domain contact"  
[https://bugzilla.mozilla.org/show\\_bug.cgi?id=1838421](https://bugzilla.mozilla.org/show_bug.cgi?id=1838421)
- Bug 1839305 "Buypass: Domain validation using externally operated DNS tools"  
[https://bugzilla.mozilla.org/show\\_bug.cgi?id=1839305](https://bugzilla.mozilla.org/show_bug.cgi?id=1839305)
- Bug 1864204 "Buypass: TLS certificates with incorrect Subject attribute order"  
[https://bugzilla.mozilla.org/show\\_bug.cgi?id=1864204](https://bugzilla.mozilla.org/show_bug.cgi?id=1864204)

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- Bug 1865368 "Buypass: TLS certificates not revoked within 5 days"  
[https://bugzilla.mozilla.org/show\\_bug.cgi?id=1865368](https://bugzilla.mozilla.org/show_bug.cgi?id=1865368)
- Bug 1872371 " Buypass: Using Using an external DNS resolver for DNS lookups"  
[https://bugzilla.mozilla.org/show\\_bug.cgi?id=1872371](https://bugzilla.mozilla.org/show_bug.cgi?id=1872371)
- Bug 1872738 "Buypass: Delayed revocation of TLS Certificates"  
[https://bugzilla.mozilla.org/show\\_bug.cgi?id=1872738](https://bugzilla.mozilla.org/show_bug.cgi?id=1872738)

The remediation measures taken by Buypass AS as described on Bugzilla (see link above) have been checked by the auditors and properly addressed the incident.

| Distinguished Name                                   | SHA-256 fingerprint  | Applied policy                            |
|--|--|---|
| CN=Bypass Class 2 Root CA,O=Bypass AS-983163327,C=NO | 9A114025197C5BB95D94E63D55CD43790847B646B23CDF11ADA4A00EFF15FB48 | ETSI EN 319 411-1 V1.4.1, PTC, DVCP, OVCP |

**Table 1: Root-CA 1 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                            |
|---|--|---|
| CN=Bypass Class 2 CA 2,O=Bypass AS-983163327,C=NO | 54A89ECB989A1DCCF4013639F38974A0BC0742C2993DFB6BD0CBF1F462964501 | ETSI EN 319 411-1 V1.4.1, PTC, DVCP, OVCP |
| CN=Bypass Class 5 CA 2,O=Bypass AS-983163327,C=NO | 3062918D9DD617925271BC7F8080B8A6A5D2185BBD880F7862FD4C043B194191 | ETSI EN 319 411-1 V1.4.1, PTC, DVCP       |

**Table 2: Sub-CA's issued by the Root-CA 1 or its Sub-CA's in scope of the audit**

## Root 2: Buypass Class 3 Root CA

|                       |   |
|-----------------------|---|
| Standards considered: | <p>European Standards:</p> <ul style="list-style-type: none"><li>• ETSI EN 319 411-2 V2.5.1 (2023-10)</li><li>• ETSI EN 319 411-1 V1.4.1 (2023-10)</li><li>• ETSI EN 319 401 V2.3.1 (2021-05)</li></ul> <p>CA Browser Forum Requirements:</p> <ul style="list-style-type: none"><li>• Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates, version 2.0.7</li><li>• Network and Certificate System Security Requirements, version 1.7</li></ul> <p>Browser Policy Requirements:</p> <ul style="list-style-type: none"><li>• Mozilla Root Store Policy, version 2.9</li><li>• Microsoft Trusted Root Program, Program Requirements</li><li>• Google Chrome Root Program Policy, Version 1.5</li><li>• Apple Root Certificate Program</li></ul> <p>Other:</p> <ul style="list-style-type: none"><li>• ETSI TS 119 495 v1.7.1 (2024-07)</li></ul> <p>For the Trust Service Provider Conformity Assessment:</p> <ul style="list-style-type: none"><li>• ETSI EN 319 403-1 V2.3.1 (2020-06)</li><li>• ETSI TS 119 403-2 V1.3.1 (2023-03)</li></ul> |
|-----------------------|---|

The audit was based on the following policy and practice statement documents of the CA / TSP:

- Certification Practice Statement - Buypass Class 3 SSL Certificates v14.5, dated: 2024-01-26 (effective date: 2024-01-26)

No major or minor non-conformities have been identified during the audit.

Findings with regard to ETSI EN 319 401:

None

Findings with regard to ETSI EN 319 411-1:

None.

Findings with regard to ETSI EN 319 411-2:

None.

This Audit Attestation also covers the following incidents as described in the following.

- Bug 1838421 "Buypass: Domain validation using not allowed domain contact"  
[https://bugzilla.mozilla.org/show\\_bug.cgi?id=1838421](https://bugzilla.mozilla.org/show_bug.cgi?id=1838421)
- Bug 1839305 "Buypass: Domain validation using externally operated DNS tools"  
[https://bugzilla.mozilla.org/show\\_bug.cgi?id=1839305](https://bugzilla.mozilla.org/show_bug.cgi?id=1839305)
- Bug 1864204 "Buypass: TLS certificates with incorrect Subject attribute order"  
[https://bugzilla.mozilla.org/show\\_bug.cgi?id=1864204](https://bugzilla.mozilla.org/show_bug.cgi?id=1864204)
- Bug 1865368 "Buypass: TLS certificates not revoked within 5 days"  
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The remediation measures taken by Buypass AS as described on Bugzilla (see link above) have been checked by the auditors and properly addressed the incident.



| Distinguished Name                                     | SHA-256 fingerprint  | Applied policy                      |
|--|--|-------------------------------------|
| CN=Buypass Class 3 Root CA,O=Buypass AS-983163327,C=NO | EDF7EBBCA27A2A384D387B7D4010C666E2EDB4843E4C29B4AE1D5B9332E6B24D | ETSI EN 319 411-1 V1.4.1, PTC, OVCP |

**Table 3: Root-CA 2 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                      |
|--|--|-------------------------------------|
| CN= Buypass Class 3 CA 2,O=Buypass AS-983163327,C=NO | DAA0435407FA44C28AB939E6823813605779093873A96649AD6E03B05D28626C | ETSI EN 319 411-1 V1.4.1, PTC, OVCP |

**Table 4: Sub-CA's issued by the Root-CA 2 or its Sub-CA's in scope of the audit**

## Modifications record

| Version   | Issuing Date | Changes             |
|-----------|--------------|---------------------|
| Version 1 | 2025-01-28   | Initial attestation |

**End of the audit attestation letter.**