SMIME BR Audit Attestation for

Actalis SpA

Reference: 21983407_1

"Ponte San Pietro (BG), 2026-06-15"

To whom it may concern,

This is to confirm that "Bureau Veritas Italia SpA" has audited the CAs of the "Actalis SpA" without critical findings.

This present Audit Attestation Letter is registered under the unique identifier number "21983407_1" covers a single Root-CA and consists of 14 pages.

Kindly find here below the details accordingly.

In case of any question, please contact:

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With best regards,

Andrea Filippi
SEE Certification
Performance & Technical Development Manager

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Technical and Innovation Manager

This attestation is based on the template version 3.1 as of 2023-08-24, that was approved for use by ACAB-c.

General audit information

Identification of the conformity assessment body (CAB) and assessment organization acting as ETSI auditor
• Bureau Veritas Italia SpA[1], Viale Monza 347, 20126 Milano, Italia, registered under IT11498640157 • Accredited by ACCREDIA under registration Annex expiry date 2027-05-24 link to Url https://services.accredia.it/ppsearch/accredia_orgmask.jsp?ID_LINK=1733&area=310&PPSEARCH_ORG_SEARCH_MASK_ORG=0663&PPSEARCH_ORG_SEARCH_MASK_STANDARDS=2&PPSEARCH_ORG_SEARCH_MASK_SCHEMI_ALTRI_STD=&PPSEARCH_ODC_SEARCH_MASK_SETTORE_ACCR=&PPSEARCH_ORG_SEARCH_MASK_CITTA=&PPSEARCH_ORG_SEARCH_MASK_PROVINCIA=&PPSEARCH_ORG_SEARCH_MASK_REGIONE=&PPSEARCH_ORG_SEARCH_MASK_STATO=&PPSEARCH_ORG_SEARCH_MASK_SCOPO=&PPSEARCH_ORG_SEARCH_MASK_ • PDFACCREDITAMENTO=&submitBtn=Cercafor the certification of trust services according to “EN ISO/IEC 17065:2012” and “ETSI EN 319 403 V2.2.2 (2015-08)” / “ETSI EN 319 403-1 V2.3.1 (2020-06)”. • Insurance Carrier (BRG section 8.2): Allianz • Third-party affiliate audit firms involved in the audit: None.
Identification and qualification of the audit team
• Number of team members: 1 • 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:

[1] in the following termed shortly “CAB“

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. • 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 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. • Additional qualification and experience Lead Auditor: On top of what is required for team members (see above), the Lead Auditor 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. • Special skills or qualifications employed throughout audit: All team members are Accredia (NAB) certified lead auditor for CA/TSP audits • 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
• Number of Reviewers/Audit Quality Managers involved independent from the audit team: 1 • 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.

Identification of the CA / Trust Service Provider (TSP):	Actalis SpA, Via San Clemente, 53, Ponte San Pietro (BG), Italia registered under IT03358520967

Type of audit:	☐ Point in time audit ☐ Period of time, after x month of CA operation ☒ Period of time, full audit
Audit period covered for all policies:	2024-06-07 to 2025-06-06
Point in time date:	none, as audit was a period of time audit
Audit dates:	2025-06-05 to 2025-06-11

Audit location:	Ponte San Pietro (BG), HQ Arezzo (AR), operational site

Root 1: Actalis Authentication Root CA

Standards considered:	European Standards: • ETSI TS 119 411-6 V1.1.1 (2023-08) • ETSI EN 319 411-2 V2.6.1 (2025-06) • ETSI EN 319 411-1 V1.5.1 (2025-04) • ETSI EN 319 401 V3.1.1 (2024-06) CA Browser Forum Requirements: • S/MIME Baseline Requirements, version 1.0.9 For the Trust Service Provider Conformity Assessment: • ETSI EN 319 403 V2.2.2 (2015-08) • ETSI EN 319 403-1 V2.3.1 (2020-06) • ETSI TS 119 403-2 V1.2.4 (2023-03)

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

- Certification Practice Statement, version 5.17 as of 2025-03-11
- Certification Practice Statement, OPERATIVE MANUAL FOR THE "AgID CA" SERVICE, version 8.0 as of 2024-07-24
- Actalis Free S/MIME Certificates Certificate Policy, version 2.2 as of 2025-03-07

  (https://www.actalis.com/it/caact-free-s-mime-certificates-policy)
- Actalis Corporate S/MIME Certificates Certificate Policy, version 2.2 as of 2025-03-07

  (https://www.actalis.com/it/corporate-s-mime-certificates-policy)

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.

To the best of our knowledge, no incidents have occurred within this Root-CA’s hierarchy during the audited period.

Distinguished Name	SHA-256 fingerprint	Applied policy
CN = Actalis Authentication Root CA O = Actalis S.p.A./03358520967 L = Milan C = IT	55926084EC963A64B96E2ABE01CE0BA86A64FBFEBCC7AAB5AFC155B37FD76066	ETSI EN 319 411-1, V1.5.1, ETSI EN 319 411-2 V2.6.1, QCP-w

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 = Actalis Authentication CA G3 O = Actalis S.p.A./03358520967 L = Milano S = Milano C = IT	A1D25D28941FAFC0C2A6EB9E596A54786E731D0A4A8E321DB9F1CF2C24FDD609	ETSI EN 319 411-2 V2.6.1, OVCP
CN = Actalis Organization Validated Server CA G3 O = Actalis S.p.A. L = Ponte San Pietro S = Bergamo C = IT	931AAA1EC9B2BA0FA59A82302F4F830628C86D9B2D2A50A4D1B2CE895C4CC648	ETSI EN 319 411-2 V2.6.1, OVCP
CN = Actalis Extended Validation Server CA G3 O = Actalis S.p.A. L = Ponte San Pietro S = Bergamo C = IT	124EAAF26F570C4FB4D89F5D61078F15B885345FCAF0C57F3477D8C63B5AB26F	ETSI EN 319 411-1, V1.5.1, ETSI EN 319 411-2 V2.6.1, EVCP, QCP-w
CN = Actalis Domain Validation Server CA G3 O = Actalis S.p.A. L = Ponte San Pietro S = Bergamo C = IT	3450B6D38290C3CA5D7BB38B71495BBF72C6D0C44DBA292245F9BCA9843A9FFF	ETSI EN 319 411-2 V2.6.1, DVCP
CN = Actalis Code Signing CA G2 O = Actalis S.p.A. L = Ponte San Pietro S = Bergamo C = IT	8CC827CEA1CD8DB79AEB7CD4BEEAE36658AF7B4C0606C257B7538AB1E710BC6A	ETSI EN 319 411-2 V2.6.1, NCP
CN = Actalis Client Authentication CA G1 O = Actalis S.p.A./03358520967 L = Milano S = Milano C = IT	ABDEEC53149098F8A0B07EFD972B345A89BEDE8EDE6975E61BE95EE026DA7EFA	ETSI EN 319 411-2 V2.6.1, LCP

Distinguished Name	SHA-256 fingerprint	Applied policy
CN = Actalis Client Authentication CA G3 O = Actalis S.p.A. L = Ponte San Pietro S = Bergamo C = IT	BB4D3EE661E5029409DB6740B9951494A7F22A7BC0FDC1A1900C07A4781F1419	ETSI EN 319 411-2 V2.6.1, LCP
CN = Actalis Time Stamping CA G1 O = Actalis S.p.A. L = Ponte San Pietro S = Bergamo C = IT	AA0CA7B6C6A4DD5335761A7213801B3D2D1829CDD0A72F4587F8830804A03B7E	N/A
CN=AgID CA1; OU=Area Soluzioni per la Pubblica Amministrazione; O=Agenzia per l'Italia Digitale; C=IT; L=Roma	32322AE2E31A7430BE1D6C04BD8CABFBD240C74D2C9DBE82780DB1F3F73660A6	ETSI EN 319 411-2 V2.6.1, LCP
CN = AgID CA SSL SERVER OU = Area Soluzioni per la Pubblica Amministrazione O = Agenzia per l'Italia Digitale C = IT, L = Roma	8B7ED5358484781F4C08376B183B018C957908CAAC32AA72ACD02E51707A58A7	ETSI EN 319 411-2 V2.6.1, OVCP

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

Root 2: Actalis SMIME RSA Root CA 2025

Standards considered:	European Standards: • ETSI EN 319 411-2 V2.6.1 (2025-06) • ETSI EN 319 411-1 V1.5.1 (2025-04) • ETSI EN 319 401 V3.1.1 (2024-06) CA Browser Forum Requirements: • EV Guidelines for TLS Server Certificates, version 2.0.1 • Baseline Requirements for TLS Server Certificates, version 2.1.5 • Baseline Requirements for the Issuance and Management of Publicly-Trusted S/MIME Certificates, version 1.0.9 Other: • ETSI applicable certification policy DVCP, OVCP, EVCP, LCP, NCP, QCP-w, Part1, Part 2 For the Trust Service Provider Conformity Assessment: • ETSI EN 319 403 V2.2.2 (2015-08) • ETSI TS 119 403-2 V1.2.4 (2023-03)

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

- Certification Practice Statement, version 5.17 as of 2025-03-11
- Actalis Free S/MIME Certificates Certificate Policy, version 2.2 as of 2025-03-07

  (https://www.actalis.com/it/caact-free-s-mime-certificates-policy)
- Actalis Corporate S/MIME Certificates Certificate Policy, version 2.2 as of 2025-03-07

  (https://www.actalis.com/it/corporate-s-mime-certificates-policy)
- Key Generation Ceremony Report for Actalis SpA as of 2025-02-28

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 1906690, Actalis S.p.A., CRL distribution point with ldap scheme
  https://bugzilla.mozilla.org/show_bug.cgi?id=1906690
- Bug 1914419, Actalis S.p.A., Use of CRLReason Code in Certificate revocation
  https://bugzilla.mozilla.org/show_bug.cgi?id=1914419
- Bug 1943379, Actalis S.p.A., CRL with duplicate serial number in revokedCertificates
  https://bugzilla.mozilla.org/show_bug.cgi?id=1943379
- Bug 1949203, Actalis S.p.A., two CAs with the same CRLDP
  https://bugzilla.mozilla.org/show_bug.cgi?id=1949203

Distinguished Name	SHA-256 fingerprint	Applied policy
CN=Actalis SMIME RSA Root CA 2025; O=Actalis S.p.A.; C=IT	F1B7C8A8F447B395786E325AF0A7571203F3812400FF1905FCA7726B858FC44A	ETSI EN 319 411-1 V. 1.5.1, LCP, NCP, NCP+, QCP-n, QCP-l, ETSI TS 119 411-6 V. 1.1.1

Table 2: Root-CA 2 in scope of the audit

Root 3: Actalis SMIME ECC Root CA 2025

Standards considered:	European Standards: • ETSI EN 319 411-2 V2.6.1 (2025-06) • ETSI EN 319 411-1 V1.5.1 (2025-04) • ETSI EN 319 401 V3.1.1 (2024-06) CA Browser Forum Requirements: • EV Guidelines for TLS Server Certificates, version 2.0.1 • Baseline Requirements for TLS Server Certificates, version 2.1.5 • Baseline Requirements for the Issuance and Management of Publicly-Trusted S/MIME Certificates, version 1.0.9 Other: • ETSI applicable certification policy DVCP, OVCP, EVCP, LCP, NCP, QCP-w, Part1, Part 2 For the Trust Service Provider Conformity Assessment: • ETSI EN 319 403 V2.2.2 (2015-08) • ETSI TS 119 403-2 V1.2.4 (2023-03)

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

- Certification Practice Statement, version 5.17 as of 2025-03-11
- Actalis Free S/MIME Certificates Certificate Policy, version 2.2 as of 2025-03-07

  (https://www.actalis.com/it/caact-free-s-mime-certificates-policy)
- Actalis Corporate S/MIME Certificates Certificate Policy, version 2.2 as of 2025-03-07

  (https://www.actalis.com/it/corporate-s-mime-certificates-policy)
- Key Generation Ceremony Report for Actalis SpA as of 2025-02-28

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 1906690, Actalis S.p.A., CRL distribution point with ldap scheme
  https://bugzilla.mozilla.org/show_bug.cgi?id=1906690
- Bug 1914419, Actalis S.p.A., Use of CRLReason Code in Certificate revocation
  https://bugzilla.mozilla.org/show_bug.cgi?id=1914419
- Bug 1943379, Actalis S.p.A., CRL with duplicate serial number in revokedCertificates
  https://bugzilla.mozilla.org/show_bug.cgi?id=1943379
- Bug 1949203, Actalis S.p.A., two CAs with the same CRLDP
  https://bugzilla.mozilla.org/show_bug.cgi?id=1949203

Distinguished Name	SHA-256 fingerprint	Applied policy
CN=Actalis SMIME ECC Root CA 2025; O=Actalis S.p.A.; C=IT	3347EEA8149CD3F6B7796CCAAD234ADA294372F7B1EA49F87F5ADB11C8581624	ETSI EN 319 411-1 V. 1.5.1, LCP, NCP, NCP+, QCP-n, QCP-l, ETSI TS 119 411-6 V. 1.1.1

Table 3: Root-CA 3 in scope of the audit

Modifications record

Version	Issuing Date	Changes
Version 1	2025-06-16	Initial attestation
Version 2	2026-06-15	Integration of new S/MIME Root CAs

End of the audit attestation letter.