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Independent Accountant's Report

To the Management of Symantec Corporation:

We have examined for Symantec Corporation's ("Symantec") certification authority (CA) operations at Mountain View, California and New Castle, Delaware, and Verisign, Inc. ("Verisign"), an independent service organization that provides data center hosting services to Symantec, Symantec's disclosure of its business, key life cycle management, certificate life cycle management, and CA environmental control practices, the provision of services in accordance with its CA business practices disclosure, and the effectiveness of its controls over key and certificate integrity, the authenticity and confidentiality of subscriber and relying party information, the continuity of key and certificate life cycle management operations, and development, maintenance, and operation of CA systems integrity throughout the period December 1, 2015 to June 15, 2016 for Symantec's VeriSign SSP Intermediate CA - G3, Symantec SSP Intermediate CA - G4, and the Symantec SSP – Customer Specific CAs¹ (collectively referred to as the "SSP CAs").

These disclosures and controls are the responsibility of Symantec and Verisign's management. Our responsibility is to express an opinion on the conformity of these disclosures and controls with the WebTrust Principles and Criteria for Certification Authorities v2.0, based on our examination.

Symantec makes use of external registration authorities for specific subscriber registration activities for the Symantec SSP – Customer Specific CAs as disclosed in the Symantec Shared Service Provider PKI Certification Practice Statement version 1.14 – dated April 12, 2013. Our examination did not extend to the controls exercised by these external registration authorities.

We conducted our examination, which commenced on October 19, 2016 and ended on April 13, 2017, in accordance with standards for attestation engagements established by the American Institute of Certified Public Accountants and, accordingly, included:

- (1) obtaining an understanding of Symantec's key and certificate life cycle management business practices and its controls over key and certificate integrity, over the authenticity and confidentiality of subscriber and relying party information, over the continuity of key and certificate life cycle management operations and over development, maintenance and operation of systems integrity;
- (2) selectively testing transactions executed in accordance with disclosed key and certificate life cycle 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 our examination provides a reasonable basis for our opinion.

¹ The Symantec SSP – Customer Specific CAs include the following:

Under the VeriSign SSP Intermediate CA - G3: FDIC Agency CA, FDIC Device CA, Naval Reactors SSP Agency CA G2, Naval Reactors SSP Device CA G2, NRC SSP Agency CA G2, NRC SSP Device CA G2, RRB Device CA, U.S. Department of Education Agency CA - G3, U.S. Department of Education Device CA - G3, U.S. Department of Transportation SSP Agency CA G3, and U.S. Department of Transportation SSP Device CA G3

Under the Symantec SSP Intermediate CA - G4: Bureau of the Census Agency CA, Naval Reactors SSP Agency CA G3, Naval Reactors SSP Device CA G3, NRC SSP Agency CA G3, NRC SSP Device CA G3, U.S. Department of Education Agency CA - G4, U.S. Department of Education Device CA - G4, U.S. Department of Transportation Agency CA G4, and U.S. Department of Transportation Device CA G4



The relative effectiveness and significance of specific controls at Symantec and Verisign 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.

We noted the following matter that resulted in a modification of our opinion:

Impacted WebTrust for CAs Criteria		Matter Noted
3.10	<p>The CA maintains controls to provide reasonable assurance that:</p> <ul style="list-style-type: none">• significant CA environmental, key management, and certificate management events are accurately and appropriately logged;• the confidentiality and integrity of current and archived audit logs are maintained;• audit logs are completely and confidentially archived in accordance with disclosed business practices; and• audit logs are reviewed periodically by authorized personnel.	<p>It was noted that physical access entry and exit logs for one of the CA facilities were not archived for 10 years and 6 months as specified in the Symantec's SSP CPS.</p> <p>This caused WebTrust for CAs Criterion 3.10 to not be met with respect to the retention of CA facility entry and exit logs.</p>

In our opinion, except for the effects of the matter discussed in the preceding paragraph, throughout the period December 1, 2015 to June 15, 2016, in all material respects:

- Symantec disclosed its business, key life cycle management, certificate life cycle management, and CA environment control practices in its:
 - Symantec Trust Network Certificate Policy, Version 2.8.20, dated May 20, 2016 ("STN CP") – published on the Symantec website (including sections 1, 2, 3, 4, 5, 6, 7, 8 and 9),
 - Symantec Shared Service Provider PKI Certification Practice Statement version 1.14 – dated April 12, 2013 ("SSP CPS") – published on the Symantec website, that was consistent with the STN CP (including sections 1, 2, 3, 4, 5, 6, 7, 8 and 9), and
 - Memorandum of Agreement dated December 19, 2016 between the Federal PKI Policy Authority and Symantec ("Symantec-MOA") (including all sections)
- Symantec provided its services in accordance with the disclosed practices including:
 - STN CP (including sections 1, 2, 3, 4, 5, 6, 7, 8 and 9),
 - SSP CPS that was consistent with the STN CP (including sections 1, 2, 3, 4, 5, 6, 7, 8 and 9), and
 - Symantec-MOA (including all sections)
- Symantec maintained effective controls to provide reasonable assurance that:
 - the integrity of keys and certificates it manages is established and protected throughout their life cycles;
 - the integrity of subscriber keys and certificates it manages is established and protected throughout their life cycles;
 - subscriber information is properly authenticated (for the registration activities performed by Symantec); and
 - subordinate CA certificate requests are accurate, authenticated, and approved



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- Symantec and Verisign² 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

for the SSP CAs based on the WebTrust Principles and Criteria for Certification Authorities v2.0.

Because of the nature and inherent limitations of controls, Symantec's 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.

This report does not include any representation as to the quality of Symantec's services beyond those covered by the WebTrust Principles and Criteria for Certification Authorities v2.0, nor the suitability of any of Symantec's services for any customer's intended purpose.

KPMG LLP

Santa Clara, California
April 13, 2017

² Limited to only physical access to CA systems and data hosted within the Verisign data center in New Castle, Delaware



**Assertion by Management as to
Its Disclosure of its Business Practices and its Controls
Over Certification Authority Operations
During the Period from December 1, 2015 through June 15, 2016**

April 13, 2017

Symantec Corporation (“Symantec”) provides the following certification authority services through the VeriSign SSP Intermediate CA - G3, Symantec SSP Intermediate CA - G4, and the Symantec SSP – Customer Specific CAs (collectively referred to as the “SSP CAs”):

- Subscriber registration
- Certificate rekey
- Certificate issuance
- Certificate distribution
- Certificate revocation
- Certificate validation
- Subordinate CA certification

Symantec also makes use of external registration authorities for specific subscriber registration activities for the Symantec SSP – Customer Specific CAs¹ as disclosed in the Symantec Shared Service Provider PKI Certification Practice Statement version 1.14 – dated April 12, 2013.

The management of Symantec is responsible for establishing and maintaining effective controls over its Symantec and Verisign CA operations, including its CA business practices disclosure, CA business practices management, CA environmental controls, CA key life cycle management controls, subscriber key life cycle management controls, certificate life cycle management controls, and subordinate CA certificate life cycle management 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 Symantec and Verisign’s certification authority operations. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

Symantec management has assessed its disclosures of its certificate practices and controls over its SSP CA services. Based on that assessment, in Symantec management’s opinion, in providing its SSP CA services at Mountain View, California and New Castle, Delaware throughout the period December 1, 2015 to June 15, 2016:

- Symantec disclosed its business, key life cycle management, certificate life cycle management, and CA environment control practices in its:
 - Symantec Trust Network Certificate Policy, Version 2.8.20, dated May 20, 2016 (“STN CP”) – published on the Symantec website (including sections 1, 2, 3, 4, 5, 6, 7, 8 and 9),
 - Symantec Shared Service Provider PKI Certification Practice Statement version 1.14 – dated April 12, 2013 (“SSP CPS”) – published on the Symantec website, that was consistent with the STN CP (including sections 1, 2, 3, 4, 5, 6, 7, 8 and 9), and

¹ The Symantec SSP – Customer Specific CAs include the following:

Under the VeriSign SSP Intermediate CA - G3: FDIC Agency CA, FDIC Device CA, Naval Reactors SSP Agency CA G2, Naval Reactors SSP Device CA G2, NRC SSP Agency CA G2, NRC SSP Device CA G2, RRB Device CA, U.S. Department of Education Agency CA - G3, U.S. Department of Education Device CA - G3, U.S. Department of Transportation SSP Agency CA G3, and U.S. Department of Transportation SSP Device CA G3

Under the Symantec SSP Intermediate CA - G4: Bureau of the Census Agency CA, Naval Reactors SSP Agency CA G3, Naval Reactors SSP Device CA G3, NRC SSP Agency CA G3, NRC SSP Device CA G3, U.S. Department of Education Agency CA - G4, U.S. Department of Education Device CA - G4, U.S. Department of Transportation Agency CA G4, and U.S. Department of Transportation Device CA G4

- Memorandum of Agreement dated December 19, 2016 between the Federal PKI Policy Authority and Symantec (“Symantec-MOA”) (including all sections)
- Symantec provided its services in accordance with the disclosed practices including:
 - STN CP (including sections 1, 2, 3, 4, 5, 6, 7, 8 and 9),
 - SSP CPS that was consistent with the STN CP (including sections 1, 2, 3, 4, 5, 6, 7, 8 and 9), and
 - Symantec-MOA (including all sections)
- Symantec maintained effective controls to provide reasonable assurance that:
 - the integrity of keys and certificates it manages is established and protected throughout their life cycles;
 - the integrity of subscriber keys and certificates it manages is established and protected throughout their life cycles;
 - subscriber information is properly authenticated (for the registration activities performed by Symantec); and
 - subordinate CA certificate requests are accurate, authenticated, and approved
- Symantec 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

based on the WebTrust Principles and Criteria for Certification Authorities v2.0, including the following:

CA Business Practices Disclosure

- Certification Practice Statement (CPS)
- Certificate Policy (CP)

CA Business Practices Management

- Certificate Policy Management
- Certification Practice Statement Management
- CP and CPS Consistency

CA Environmental Controls

- Security Management
- Asset Classification and Management
- Personnel Security
- Physical & Environmental Security
- Operations Management
- System Access Management
- System Development and Maintenance
- Business Continuity Management
- Monitoring and Compliance
- Audit Logging

CA Key Life Cycle Management Controls

- CA Key Generation
- CA Key Storage, Backup, and Recovery
- CA Public Key Distribution
- CA Key Usage
- CA Key Archival and Destruction

- CA Key Compromise
- CA Cryptographic Hardware Life Cycle Management

Subscriber Key Life Cycle Management Controls

- Requirements for Subscriber Key Management

Certificate Life Cycle Management Controls

- Subscriber Registration
- Certificate Rekey
- Certificate Issuance
- Certificate Distribution
- Certificate Revocation
- Certificate Validation

Subordinate CA Certificate Life Cycle Management Controls

- Subordinate CA Certificate Life Cycle Management

except for the effects of the matter noted below:

	Impacted WebTrust for CAs Criteria	Matter Noted
3.10	The CA maintains controls to provide reasonable assurance that: <ul style="list-style-type: none"> • significant CA environmental, key management, and certificate management events are accurately and appropriately logged; • the confidentiality and integrity of current and archived audit logs are maintained; • audit logs are completely and confidentially archived in accordance with disclosed business practices; and • audit logs are reviewed periodically by authorized personnel. 	It was noted that physical access entry and exit logs for one of the CA facilities were not archived for 10 years and 6 months as specified in the Symantec's SSP CPS. Access log retention requirements for Symantec CA facilities exceed Symantec Corporate Security requirements. Due to recent personnel changes within the Corporate team that manages data retention across the company, CA facility log retention periods were reduced to match Corporate security log retention requirements without approval from the Symantec Website Security business unit. As of June 15, 2016, the retention periods of physical access logs have been updated to comply with the respective requirements for CA facilities. In addition, policy updates have been put in place to require supplemental approval and periodic monitoring of data retention requirements moving forward.

Symantec Corporation

Nicolas Popp
Senior Vice President, Information Protection



**Assertion by Management of Verisign, Inc.
Regarding its Controls
Over Symantec Certification Authority Operations Hosted in New Castle, Delaware
During the Period December 1, 2015 through June 15, 2016**

April 13, 2017

Verisign, Inc., an independent service organization (sub-service provider), provides data center hosting services to Symantec Corporation ("Symantec") for Symantec Certification Authorities (CAs) hosted in New Castle, Delaware.

Management of Verisign is responsible for establishing and maintaining effective controls over its data center hosting services for Symantec CAs hosted in New Castle, Delaware including CA environmental controls (limited to physical and environmental security). These controls contain monitoring mechanisms, and actions are taken to correct deficiencies identified.

Controls have inherent limitations, including the possibility of human error and the circumvention or overriding of controls. Accordingly, even effective internal control can provide only reasonable assurance with respect to Verisign's data center hosting services for Symantec CAs hosted in New Castle, Delaware. Furthermore, because of changes in conditions, the effectiveness of controls may vary over time.

Management has assessed the controls over its data center hosting services for Symantec CA operations. Based on that assessment, to the best of our knowledge and belief, we confirm that in providing its data center hosting services in New Castle, Delaware during the period December 1, 2015 through June 15, 2016, Verisign has

- Maintained effective controls to provide reasonable assurance that
 - Physical access to Symantec CA systems and data was restricted to authorized individuals

based on the WebTrust Principles and Criteria for Certification Authorities v2.0 including the following:

CA Environmental Controls

- Physical and Environmental Security

Verisign, Inc.

Joseph David Pool
Senior Vice President of Architecture & Tech Services