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Assertion of the Directors as to its Disclosure of its Business Practices and its Controls Over its Certification Authority Operations during the period from May 19, 2003 through to August 19, 2003

September 30, 2003

Comodo operates as a Certification Authority (“CA”) known as Comodo CA Ltd. Comodo CA Ltd, as a Root CA, provides the following certification authority services:

- Subscriber registration
- Certificate renewal
- Certificate rekey
- Certificate issuance
- Certificate distribution [using an online repository]
- Certificate revocation
- Certificate status information processing [using an online repository]

The Directors of Comodo CA Ltd are responsible for establishing and maintaining effective controls over its CA operations, including CA business practices disclosure in its **Certification Practice Statement** on its website, service integrity (including key and certificate life cycle management controls), and CA environmental 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 provide only reasonable assurance with respect to Comodo CA Ltd’s Certification Authority operations. Furthermore because of changes in conditions, the effectiveness of controls may vary over time.

The Directors have assessed the controls over its CA operations. Based on that assessment, in the Directors of Comodo’s, opinion, in providing its Certification Authority (CA) services at Manchester, United Kingdom , Comodo CA Ltd, during the period from May 19, 2003 through to August 19, 2003:

- Disclosed its key and certificate life cycle management business and information privacy practices and provided such services in accordance with its disclosed practices
- Maintained effective controls to provide reasonable assurance that:
 - Subscriber information was properly authenticated (for the registration activities performed by Comodo CA Ltd) and
 - The integrity of keys and certificates it managed was established and protected throughout their life cycles
- Maintained effective controls to provide reasonable assurance that:

- Subscriber and relying party information was restricted to authorized individuals and protected from uses not specified in the CA's business practices disclosure;
- The continuity of key and certificate life cycle management operations was maintained; and
- CA systems development, maintenance and operations were properly authorized and performed to maintain CA systems integrity

based on the AICPA/CICA WebTrust for Certification Authorities Criteria including the following:

CA Business Practices Disclosure

Service Integrity

Key Life Cycle Management Controls

- CA Key Generation
- CA Key Storage, Backup, and Recovery
- CA Public Key Distribution
- CA Key Escrow
- CA Key Usage
- CA Key Destruction
- CA Key Archival
- CA Cryptographic Hardware Life Cycle Management

Certificate Life Cycle Management Controls

- Subscriber Registration
- Certificate Renewal
- Certificate Rekey
- Certificate Issuance
- Certificate Distribution
- Certificate Revocation
- Certificate Status Information Processing

CA Environmental Controls

- Certification Practice Statement and Certificate Policy Management
- Security Management
- Asset Classification and Management
- Personnel Security
- Physical and Environmental Security
- Operations Management
- System Access Management
- Systems Development and Maintenance
- Business Continuity Management
- Monitoring and Compliance
- Event Journaling

Melih Abdulhayoglu

Director