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CA/Browser Forum

Baseline Requirements for the Issuance and Management of Publicly-Trusted Code Signing Certificates

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Baseline Requirements for the Issuance and Management of Publicly-Trusted Code Signing Certificates

Version 1.0, as adopted by the CA/Browser Forum on nn aaa nnnn.

These requirements describe an integrated set of technologies, protocols, identity-proofing, lifecycle management, and auditing requirements that are minimum standards for the issuance and management of Code-Signing Certificates that are trusted because their corresponding Root Certificate is distributed in widely-available application software. These Requirements are not mandatory for Certification Authorities unless and until they become adopted and enforced by an Application Software Supplier.

Notice to Readers

This version of the Baseline Requirements for the Issuance and Management of Publicly-Trusted Code Signing Certificates presents criteria established by the CA/Browser Forum for use by Certification Authorities when issuing, maintaining, and revoking publicly-trusted Code Signing Certificates. The Requirements may be revised from time to time, as appropriate, in accordance with procedures adopted by the CA/Browser Forum. Questions and suggestions concerning these requirements may be directed to the CA/Browser Forum via email at questions@cabforum.org.

The CA/Browser Forum

The CA/Browser Forum is a voluntary organization of Certification Authorities and suppliers of Internet browser and other relying-party software applications. The list of CA/Browser Forum members is available on the following website: <https://www.cabforum.org>.

Other groups that have participated in the development of these Requirements include the WebTrust task force and ETSI ESI. Participation by such groups does not imply their endorsement, recommendation, or approval of the final product.

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1. Scope

The Baseline Requirements for the Issuance and Management of Publicly-Trusted Code Signing Certificates describe a subset of the requirements that a Certification Authority must meet to issue publicly-trusted Code Signing Certificates. This document incorporates by reference both the Baseline Requirements for the Issuance and Management of Publicly-Trusted Certificates (“General Baseline Requirements”) and the Network and Certificate System Security Requirements as established by the CA/Browser Forum, copies of which are available on the CA/Browser Forum’s website at www.cabforum.org.

The scope of these Requirements includes all “Code Signing Certificates”, as defined below, and associated Timestamp Authorities, and all Certification Authorities technically capable of issuing Code Signing Certificates, including any Root CA that is publicly trusted for code signing and all other CAs that might serve to complete the validation path to such Root CA. These Requirements do not address the issuance, use, maintenance, or revocation of Certificates by enterprises that operate their own Public Key Infrastructure for internal purposes only, where the Root CA Certificate is not distributed by any Application Software Supplier (as defined in the General Baseline Requirements).

2. Purpose

The primary goal of these Requirements is to enable trusted signing of code intended for public distribution, while addressing user concerns about the trustworthiness of signed objects and accurately identifying the software publisher. The Requirements also serve to inform users about the purpose of signed code, help users make informed decisions when relying on Certificates, help establish the legitimacy of signed code, help maintain the trustworthiness of software Platforms, help users make informed software choices, and limit the spread of malware. Code signing certificates do not identify a particular software object, identifying only the distributor of software.

3. References

As specified in the General Baseline Requirements. Cross-references to Sections of the General Baseline Requirements are notated with the letters “BR”, as in “BR Section 11.2.”

This document may also mention or refer to the CA/Browser Forum’s Extended Validation Guidelines For the Issuance and Management of Extended Validation Certificates (“EV SSL Guidelines”) and the Guidelines for the Issuance and Management of Extended Validation Code Signing Certificates (“EV Code Signing Guidelines”), also available on the CA/Browser Forum’s website at www.cabforum.org.

4. Definitions

Capitalized Terms are as defined in the General Baseline Requirements except where defined below:

Anti-Malware Organization: An entity that maintains information about Suspect Code and/or develops software used to prevent, detect, or remove malware.

Application Software Supplier: A supplier of software or other relying-party application software that displays or uses Code Signing Certificates, incorporates Root Certificates, and adopts these Requirements as all or part of its requirements for participation in a root store program.

Certification Authority: An organization subject to these Requirements that is responsible for a Code Signing Certificate and, under these Requirements, oversees the creation, issuance, revocation, and management of Code Signing Certificates. Where the CA is also the Root CA, references to the CA are synonymous with Root CA.

Certificate Beneficiaries: As defined in section 7.1.1.

Certificate Requester: A natural person who is the Applicant, employed by the Applicant, an authorized agent who has express authority to represent the Applicant, or the employee or agent of a third party (such as software publisher) who completes and submits a Certificate Request on behalf of the Applicant.

Code Signature: A Signature logically associated with a signed Object.

Code Signing Certificate: A digital certificate issued by a CA that contains a code Signing EKU, contains the anyExtendedKeyUsage EKU, or omits the EKU extension and is trusted in an Application Software Provider's root store to sign software objects. [NOTE: Appendix B, subsection (3) of Appendix B requires the presence of the codeSigning EKU and prohibits use of the anyExtendedKeyUsage EKU.]

Declaration of Identity: A written document that consists of the following:

1. the identity of the person performing the verification,
2. a signature of the Applicant,
3. a unique identifying number from an identification document of the Applicant,
4. the date of the verification, and
5. a signature of the Verifying Person.

Effective Date: The date this document is adopted as a root store requirement by an Application Software Supplier.

High Risk Region of Concern (HRRC): As set forth in Appendix D, a geographic location where the detected number of Code Signing Certificates associated with signed Suspect Code exceeds 5% of the total number of detected Code Signing Certificates originating or associated with the same geographic area.

Issuer: The CA providing a Code Signing Certificate to the Subscriber.

Individual Applicant: An Applicant who is a natural person and requests a Certificate that will list the Applicant's legal name as the Certificate's Subject.

Lifetime Signing OID: An optional extended key usage OID (1.3.6.1.4.1.311.10.3.13) used by Microsoft Authenticode to limit the lifetime of the code signature to the expiration of the code signing certificate.

Object: A contiguous set of bits that has been or can be digitally signed with a Private Key that corresponds to a Code Signing Certificate; also referred to herein as “Code”.

Organizational Applicant: An Applicant that requests a Certificate with a name in the Subject field that is for an organization and not the name of an individual. Organizational Applicants include private and public corporations, LLCs, partnerships, government entities, non-profit organizations, trade associations, and other legal entities.

Platform: The computing environment in which an Application Software Supplier uses Code Signing Certificates, incorporates Root Certificates, and adopts these Requirements.

QGIS: As defined in the EV SSL Guidelines.

QIIS: As defined in the EV SSL Guidelines.

Registration Identifier: The unique code assigned to an Applicant by the Incorporating or Registration Agency in such entity’s Jurisdiction of Incorporation or Registration.

Requirements: This document, the General Baseline Requirements, and the Network and Certificate System Security Requirements.

Signature: An encrypted electronic data file which is attached to or logically associated with other electronic data and which (i) identifies and is uniquely linked to the signatory of the electronic data, (ii) is created using means that the signatory can maintain under its sole control, and (iii) is linked in a way so as to make any subsequent changes that have been made to the electronic data detectable.

Signing Service: An organization that signs an Object on behalf of a Subscriber using a Private Key associated with a Code Signing Certificate.

Subscriber: The Subject of a Code Signing Certificate. A Subscriber is the entity responsible for distributing the software but does not necessarily hold the copyright to the software.

Suspect Code: Code that contains malicious functionality or serious vulnerabilities, including spyware, malware and other code that installs without the user's consent and/or resists its own removal, and code that can be exploited in ways not intended by its designers to compromise the trustworthiness of the Platforms on which it executes.

Takeover Attack: An attack where a Signing Service or Private Key associated with a Code Signing Certificate has been compromised by means of fraud, theft, intentional malicious act of the Subject’s agent, or other illegal conduct.

Timestamp Authority: A service operated by the CA or a delegated third party for its own code signing certificate users that timestamps data using a certificate chained to a public root, thereby asserting that the data (or the data from which the data were derived via a secure hashing

algorithm) existed at the specified time. If the Timestamp Authority is delegated to a third party, the CA is responsible that the delegated third party complies with these guidelines.

Timestamp Certificate: A certificate issued to a Timestamp Authority to use to timestamp data.

Verifying Person: A notary, attorney, Latin notary, accountant, individual designated by a government agency as authorized to verify identities, or agent of the CA, who attests to the identity of an individual.

5. Abbreviations and Acronyms

As specified in the General Baseline Requirements.

6. Conventions

Terms not otherwise defined in these Requirements are as defined in the CA's applicable agreements, user manuals, Certificate Policies, and Certification Practice Statements.

The key words "REQUIRED", "SHALL", "SHALL NOT", "SHOULD", "SHOULD NOT", "RECOMMENDED", "MAY", and "OPTIONAL" in these Requirements are used in accordance with RFC 2119.

7. Certificate Warranties and Representations

7.1 *Certificate Beneficiaries*

Certificate Beneficiaries means any one of the following:

1. All Application Software Suppliers with whom the Issuer or its Root CA has entered into a contract for distribution of its Root Certificate in software distributed by such Application Software Suppliers, or
2. All Relying Parties who reasonably rely on such a Certificate while a Signature associated with the Certificate is valid.

7.2 *Certificate Warranties*

1. **Compliance.** The Issuer and any Signing Service each represents that it has complied with these Requirements and the applicable Certificate Policy and Certification Practice Statement in issuing each Code Signing Certificate and operating its PKI or Signing Service.
2. **Identity of Subscriber:** At the time of issuance, the Issuer or Signing Service represents that it (i) operated a procedure for verifying the identity of the Subscriber that at least meets the requirements in Section 11 of this document, (ii) followed the procedure when issuing or managing the Certificate, and (iii) accurately described the same procedure in the Issuer's Certificate Policy or Certification Practice Statement.

3. **Authorization for Certificate:** At the time of issuance, the Issuer represents that it (i) operated a procedure for verifying that the Applicant authorized the issuance of the Certificate, (ii) followed the procedure, and (iii) accurately described the same procedure in the Issuer's Certificate Policy or Certification Practice Statement.
4. **Accuracy of Information:** At the time of issuance, the Issuer represents that it (i) operated a procedure for verifying that all of the information contained in the Certificate (with the exception of the subject:organizationalUnitName attribute) was true and accurate; (ii) followed the procedure; and (iii) accurately described the same procedure in the CA's Certificate Policy or Certification Practice Statement.
5. **Key Protection:** The Issuer represents that it provided the Subscriber at the time of issuance with documentation on how to securely store and prevent the misuse of Private Keys associated with Code Signing Certificates, or in the case of a Signing Service, securely stored and prevented the misuse of Private Keys associated with Code Signing Certificates;
6. **Subscriber Agreement:** The Issuer and Signing Service represent that the Issuer or Signing Service entered into a legally valid and enforceable Subscriber Agreement with the Applicant that satisfies these Requirements.
7. **Status:** The CA represents that it will maintain a 24 x 7 online-accessible Repository with current information regarding the status of Certificates as valid or revoked for the period required by these Requirements.
8. **Revocation:** The CA represents that it will revoke a Certificate upon the occurrence of a revocation event specified in these Requirements.

7.3 Applicant Warranty

The Issuer or Signing Service **MUST** require, as part of the Subscriber Agreement, that the Applicant make the commitments and warranties set forth in Section 10.3.2 and/or Section 10.3.3 of this document, as applicable, for the benefit of the Issuer and the Certificate Beneficiaries.

8. Community and Applicability

8.1 Compliance

The CA and/or all Signing Services **MUST**, at all times:

1. Comply with all laws applicable to its business and the Certificates it issues in each jurisdiction where it operates,
2. Comply with these Requirements,
3. Comply with the audit requirements set forth in Section 17 of this document, and
4. If a CA, be licensed as a CA in each jurisdiction where it operates, if licensing is required by the law of such jurisdiction for the issuance of Certificates.

If a court or government body with jurisdiction over the activities covered by these Requirements determines that the performance of any mandatory requirement is illegal, then such requirement is considered reformed to the minimum extent necessary to make the requirement valid and legal. This applies only to operations or certificate issuances that are subject to the laws of that jurisdiction. The parties involved MUST notify the CA/Browser Forum of the facts, circumstances, and law(s) involved, so that the CA/Browser Forum may revise these Requirements accordingly.

8.2 Certificate Policies

8.2.1 Implementation

The CA and its Root CA MUST develop, implement, enforce, display prominently on its Web site, and periodically update its policies and practices, including its Certificate Policy and/or Certification Practice Statement, that implement the most current version of these Requirements.

With the exception of revocation checking for time-stamped and expired Certificates, Platforms are expected to validate Code Signatures in accordance with RFC 5280 when first encountered. Subsequent signature validation MAY ignore revocation, especially if rejecting the Code will cause the device to fail to boot. When a Platform encounters a Certificate that fails to validate due to revocation, the Platform should not permit the Code to execute. When a Platform encounters a Certificate that fails to validate for reasons other than revocation, the Platform should treat the Code as unsigned.

Ordinarily, a Code Signature created by a Subscriber is only considered valid until expiration of the Certificate. However, the “Timestamp” method and the “Signing Service” methods permit Code to remain valid for longer periods of time.

1. **Timestamp Method:** In this method, the Subscriber signs the Code, appends its Code Signing Certificate and submits it to a Timestamp Authority to be time-stamped. The resulting package can be considered valid after expiration of the Code Signing Certificate and expiration of the Timestamp Authority certificate if the timestamp is dated prior to the Certificate’s expiration date and any applicable revocation date. (See Section 13.2.)
2. **Signing Service Method:** In this method, the Subscriber uses the service to sign compiled code, binary, file, app, or similar object. Alternatively, the service MAY sign a digest of the preceding objects. The resulting Code Signature is valid up to the expiration time of the Signing Service’s Code Signing Certificate and any applicable revocation date, whichever comes first. Signing Services MAY also timestamp signed objects.

8.2.2 Disclosure

Each CA, including Root CAs, MUST publicly disclose their policies and practices through an appropriate and readily accessible online means that is available on a 24x7 basis. The CA MUST publicly disclose its Certificate Practice Statement and/or Certificate Policies and structure the disclosures in accordance with either RFC 2527 or RFC 3647.

8.3 *Commitment to Comply*

Each CA MUST give public effect to these Requirements and represent that they will adhere to the latest published version by either (i) incorporating the Requirements directly into their respective Certification Practice Statements or (ii) by referencing the Requirements using a clause such as the following:

[Name of CA] conforms to the current version of the CA/Browser Forum's Baseline Requirements for the Issuance and Management of Publicly-Trusted Code Signing Certificates published at <http://www.cabforum.org>. If there is any inconsistency between this document and those Requirements, those Requirements take precedence over this document.

In either case, each CA MUST include a link to the official version of these Requirements. In addition, each CA MUST include (directly or by reference) applicable parts of these Requirements in all contracts with Subordinate CAs, RAs, Signing Services, Enterprise RAs, and subcontractors, that involve or relate to the issuance or management of Certificates. CAs MUST enforce compliance with such terms.

8.4 *Trust model*

Each CA MUST represent that it has disclosed all Cross Certificates in its Certificate Policy/Certificate Practice Statement that identify the CA as the Subject, provided that the CA arranged for or accepted the establishment of the trust relationship (i.e. the Cross Certificate at issue).

9. *Certificate Content and Profile*

9.1 *Issuer Information*

As specified in BR Section 9.1.

9.2 *Subject Information*

Code Signing Certificates issued to Subscribers MUST include the following information in the fields listed:

9.2.1 *Subject Alternative Name Extension*

This field MUST be present, MUST contain a permanentIdentifier (1.3.6.1.5.5.7.8.3) name form as defined in RFC 4043, and MUST NOT contain a Domain Name or IP Address. The CA MUST construct the permanentIdentifier name form as follows:

1. For a Code Signing Certificate where a Registration Identifier is provided by government entity used to verify the Subject's identity, the Certificate MUST include a SubjectAltName:permanentIdentifier name form that contains the following:
 - a. The ISO 3166-2 country code corresponding to the government entity used to verify the identity of the Code Signing Certificate's Subject,

- b. If applicable, the state, province, or locality of the government entity that assigned the Registration Identifier, and
- c. The Registration Identifier provided by the government entity used to verify the identity of the Code Signing Certificate's Subject.

If a state, province, or locality is not applicable, the CA MUST format the SubjectAltName:permanentIdentifier data using UTF8 as follows: [Country Code]-[Registration Identifier]. Otherwise, the CA MUST format the SubjectAltName:permanentIdentifier data using UTF8 as follows: [Country Code]-[State/locality] -[Registration Identifier]. In the format above, the CA MUST replace the bracketed items with the Applicant's validated information and not include the brackets.

2. For each Code Signing Certificate issued to either an individual or where a Registration Identifier is not provided by a government entity, the Code Signing Certificate MUST include a SubjectAltName:permanentIdentifier name form that contains either: (a) an identifier included in a Code Signing Certificate previously issued to the same Subject, or (b) a non-sequential unique identifier generated by the CA that exhibits at least 20 bits of entropy. If using option (a), the CA MUST verify the Subject's control over the Private Key associated with the previously issued Code Signing Certificate containing the identifier.
3. The "assigner name form" MUST be absent from the SAN field used for the permanentIdentifier, however it is expected that the application software will treat it as globally unique

9.2.2 Subject Common Name Field

Certificate Field: subject:commonName (OID 2.5.4.3)

Required/Optional: Required

Contents: This field MUST contain the Subject's legal name as verified under BR Section 11.2.

9.2.3 Subject Domain Component Field

This field MUST not be present in a Code Signing Certificate.

9.2.4 Subject Distinguished Name Fields

- a. **Certificate Field:** subject:organizationName (OID 2.5.4.10)

Required/Optional: Required.

Contents: The subject:organizationName field MUST contain either the Subject's name or DBA as verified under BR Section 11.2. The CA MAY include information in this field that differs slightly from the verified name, such as common variations or abbreviations, provided that the CA documents the difference and any abbreviations used are locally accepted abbreviations; e.g., if the official record shows "Company Name Incorporated", the

CA MAY use “Company Name Inc.” or “Company Name”. Because subject name attributes for individuals (e.g. givenName (2.5.4.42) and surname (2.5.4.4)) are not broadly supported by application software, the CA MAY use the subject:organizationName field to convey a natural person Subject’s name or DBA.

- b. **Certificate Field:** Number and street: subject:streetAddress (OID: 2.5.4.9)

Required/Optional: Optional.

Contents: If present, the subject:streetAddress field MUST contain the Subject’s street address information as verified under BR Section 11.2.

- c. **Certificate Field:** subject:localityName (OID: 2.5.4.7)

Required/Optional: Required if the subject:stateOrProvinceName field is absent. Optional if the subject:stateOrProvinceName field is present.

Contents: If present, the subject:localityName field MUST contain the Subject’s locality information as verified under BR Section 11.2. If the subject:countryName field specifies the ISO 3166-1 user-assigned code of XX in accordance with BR Section 9.2.5, the localityName field MAY contain the Subject’s locality and/or state or province information as verified under BR Section 11.2.

- d. **Certificate Field:** subject:stateOrProvinceName (OID: 2.5.4.8)

Required/Optional: Required if the subject:localityName field is absent. Optional if the subject:localityName field is present.

Contents: If present, the subject:stateOrProvinceName field MUST contain the Subject’s state or province information as verified under BR Section 11.2. If the subject:countryName field specifies the ISO 3166-1 user-assigned code of XX in accordance with BR Section 9.2.5, the subject:stateOrProvinceName field MAY contain the full name of the Subject’s country information as verified under BR Section 11.2.5.

- e. **Certificate Field:** subject:postalCode (OID: 2.5.4.17)

Required/Optional: Optional

Contents: If present, the subject:postalCode field MUST contain the Subject’s zip or postal information as verified under BR Section 11.2.

- f. **Certificate Field:** subject:countryName (OID: 2.5.4.6)

Required/Optional: Required

Contents: The subject:countryName MUST contain the two-letter ISO 3166-1 country code associated with the location of the Subject verified under BR Section 11.2. If a Country is not represented by an official ISO 3166-1 country code, the CA MAY specify the ISO 3166-1 user-assigned code of XX indicating that an official ISO 3166-1 alpha-2 code has not been assigned.

9.2.5 Reserved

9.2.6 Subject Organizational Unit Field

Certificate Field: subject:organizationalUnitName

Required/Optional: Optional.

Contents: The CA MUST implement a process that prevents an OU attribute from including a name, DBA, tradename, trademark, address, location, or other text that refers to a specific natural person or Legal Entity unless the CA has verified this information in accordance with BR Section 11.2.

9.2.7 Reserved

9.2.8 Other Subject Attributes

As specified in BR Section 9.2.8.

9.3 Certificate Policy Identification

This section sets forth minimum requirements for the content of the Subscriber, Subordinate CA, and Root CA Certificates, as they relate to the identification of Certificate Policy.

9.3.1 Certificate Policy Identifiers

The following Certificate Policy Identifier is reserved for use by CAs as a required means of asserting compliance with these Requirements as follows:

{joint-iso-itu-t(2) international-organizations(23) ca-browser-forum(140) certificate-policies(1) baselinerequirements(2) code signing(3)} (2.23.140.1.2.3)

9.3.2 Root CA Requirements

A Root CA Certificate SHOULD NOT contain the certificatePolicies extension.

9.3.3 Subordinate CA Certificates

A Certificate issued after the Effective Date to a Subordinate CA that is not an Affiliate of the Issuing CA:

1. MUST include the policy identifier specified in Section 9.3.1 that indicates the Subordinate CA's adherence to and compliance with these Requirements (i.e. either the CA/Browser Forum reserved identifiers or identifiers defined by the CA in its Certificate Policy and/or Certification Practice Statement), and
2. MUST NOT contain the "anyPolicy" identifier (2.5.29.32.0).

A Certificate issued after the Effective Date to a Subordinate CA that is an affiliate of the Issuing CA:

1. MUST include the CA/Browser Forum reserved identifier specified in Section 9.3.1 to indicate the Subordinate CA's compliance with these Requirements, and

2. MAY contain the “anyPolicy” identifier (2.5.29.32.0) in place of an explicit policy identifier.

A Subordinate CA MUST represent, in its Certificate Policy and/or Certification Practice Statement, that all Certificates containing a policy identifier indicating compliance with these Requirements are issued and managed in accordance with these Requirements.

9.3.4 Subscriber Certificates

A Certificate issued to a Subscriber MUST contain one or more policy identifier(s), defined by the CA, in the Certificate’s certificatePolicies extension that indicates adherence to and compliance with these Requirements. CAs complying with these Requirements MAY also assert the reserved policy OIDs in such Certificates.

The CA MUST document in its Certificate Policy or Certification Practice Statement that the Certificates it issues containing the specified policy identifier(s) are managed in accordance with these Requirements.

9.4 Maximum Validity Period

Subscribers and Signing Authorities MAY sign Code at any point in the development or distribution process. Code Signatures may be verified at any time, including during download, unpacking, installation, reinstallation, or execution, or during a forensic investigation.

The validity period for a Code Signing Certificate issued to a Subscriber or Signing Service MUST NOT exceed 39 months. The validity period for a Timestamp Certificate issued to a Timestamp Authority MUST meet or exceed the length of time the CA supports validation of Code Signatures as specified publicly to Subscribers through their Certificate Policy and/or Certificate Practice Statement. The Timestamp Certificate MUST meet the "Minimum Cryptographic Algorithm and Key Size Requirements" in Appendix A for the communicated time period.

The Timestamp Authority MUST use a new Timestamp Certificate with a new private key no later than every 15 months to minimize the impact to users in the event that a Timestamp Certificate's private key is compromised.

CAs issuing Timestamp Certificates to be verified on a specific Platform SHOULD minimize the Timestamp Certificate validity period as much as the Platform will allow.

9.5 Subscriber Public Key

As specified in BR Section 9.5.

9.6 Certificate Serial Number

As specified in BR Section 9.6.

9.7 *Reserved*

9.8 *Reserved*

10. Certificate Request

10.1 Documentation Requirements

As specified in BR Section 10.1.

10.2 Certificate Request

10.2.1 General

Prior to the issuance of a Certificate, the CA **MUST** obtain from the Applicant a request for a certificate in a form prescribed by the CA and that complies with these Requirements. One request **MAY** suffice for multiple Certificates to be issued to the same Applicant, subject to the aging and updating requirement in Section 11.3, provided that each Certificate is supported by a valid, current request signed by the appropriate Applicant Representative on behalf of the Applicant. The request **MAY** be made, submitted and/or signed electronically.

Prior to signing an Object, the Signing Authority **MUST** obtain from the Applicant a signing request in a form prescribed by the Signing Authority and that complies with these Requirements. One signing request **MAY** suffice for multiple signatures for the same Applicant, subject to the requirements specified herein. The signing request **MAY** be made, submitted and/or signed electronically.

10.2.2 Request and Certification

The certificate requestor signing request **MUST** contain a request from, or on behalf of, the Applicant and a certification by, or on behalf of, the Applicant that all of the information contained therein is correct. Information Requirements

The certificate request or signing request **MAY** include all factual information about the Applicant necessary to issue the Certificate or sign the Object, and such additional information as is necessary for the CA or Signing Authority to obtain from the Applicant in order to comply with these Requirements and the CA's Certificate Policy and/or Certification Practice Statement. In cases where the certificate request or signing request does not contain all the necessary information about the Applicant, the CA or Signing Service **MUST** obtain the remaining information from the Applicant or, having obtained it from a reliable, independent, third-party data source, confirm it with the Applicant. The CA or Signing Service **MUST** establish and follow a documented procedure for verifying all data requested for inclusion in the Certificate by the Applicant.

10.2.3 Subscriber Private Key

If the CA or any Delegated Third Party is generating the Private Key on behalf of the Subscriber where the Private Keys will be transported to the Subscriber outside of the Signing Service's secure infrastructure, then the entity generating the Private Key **MUST** encrypt the Private Key with at least 128 bits of encryption strength. Allowed methods include using a 128-bit AES key to wrap the

private key or storing the key in a PKCS 12 file encrypted with a randomly generated password of more than 16 characters containing uppercase letters, lowercase letters, numbers, and symbols for transport.

For Certificates transported outside of a Signing Service's secure infrastructure, the CA or Signing Service MUST require, by contract, each Subscriber to generate their own Private Key and protect the Private Key in accordance with Section 16.2 ("Private Key Protection").

10.3 *Subscriber Agreement*

10.3.1 General

As specified in BR Section 10.3.1.

10.3.2 Agreement Requirements

The Applicant MUST make the following obligations and warranties through a Subscriber Agreement or Terms of Use:

1. **Accuracy of Information:** To provide accurate and complete information at all times in connection with the issuance of a Certificate, including in the Certificate Request and as otherwise requested by the CA.
2. **Protection of Private Key:** Where the key is available outside a Signing Service, to maintain sole control of, keep confidential, and properly protect, at all times in accordance with Section 16, the Private Key that corresponds to the Public Key to be included in the requested Certificate(s) (and any associated activation data or device, e.g. password or token). The CA MUST provide the Subscriber with documentation on how to protect a Private Key. The CA MAY provide this documentation as a white paper or as part of the Subscriber Agreement. The Subscriber MUST represent that it will generate and operate any device storing private keys in a secure manner, as described in a document of code signing best practices, which the CA MUST provide to the Subscriber during the ordering process. The CA MUST obligate the Subscriber to use passwords that are randomly generated with at least 16 characters containing uppercase letters, lowercase letters, numbers, and symbols to transport private keys.
3. **Private Key Reuse:** To not apply for a Code Signing Certificate if the Public Key in the Certificate is or will be used with a non-Code Signing Certificate.
4. **Use:** To use the Certificate and associated Private Key only for authorized and legal purposes, including not using the Certificate to sign Suspect Code and to use the Certificate and Private Key solely in compliance with all applicable laws and solely in accordance with the Subscriber Agreement or Terms of Use.
5. **Compliance with Industry Standards:** An acknowledgment and acceptance that the CA may modify the Subscriber Agreement or Terms of Use when necessary to comply with any changes in these Requirements or the General Baseline Requirements.

6. **Prevention of Misuse:** To provide adequate network and other security controls to protect against misuse of the Private Key and that the CA will revoke the Certificate without requiring prior notification if there is unauthorized access to the Private Keys.
7. **Acceptance of Certificate:** Not to use the Certificate until after the Applicant, or an agent of Applicant, has reviewed and verified the Certificate contents for accuracy.
8. **Reporting and Revocation:** To promptly cease using a Certificate and its associated Private Key and promptly request that the CA revoke the Certificate if (a) any information in the Certificate is, or becomes, incorrect or inaccurate, (b) there is any actual or suspected misuse or compromise of the Private Key associated with the Public Key contained in the Certificate, or (c) there is evidence that the Certificate was used to sign Suspect Code.
9. **Sharing of Information:** An acknowledgment and acceptance that, if: (a) the Certificate or the Applicant is identified as a source of Suspect Code, (b) the authority to request the Certificate cannot be verified, or (c) the Certificate is revoked for reasons other than Subscriber request (e.g. as a result of private key compromise, discovery of malware, etc.), then the CA is authorized to share information about the Applicant, signed application, Certificate, and surrounding circumstances with other CAs or industry groups, including the CA/Browser Forum.
10. **Termination of Use of Certificate:** To promptly cease using the Private Key corresponding to the Public Key listed in a Certificate upon expiration or revocation of the Certificate.
11. **Acknowledgment and Acceptance:** An acknowledgement and acceptance that the CA is entitled to revoke the certificate immediately if the Applicant were to violate the Terms of Use or the Subscriber Agreement or if the CA discovers that the Certificate is being used in illegal activity such as phishing, fraud, malware distribution, etc.

10.3.3 Service Agreement Requirements for Signing Authorities

The CA MUST contractually obligate each Signing Service to inform the CA if the Signing Service becomes aware (by whatever means) that the Signing Service has signed Suspect Code. The CA MUST require the Signing Service to request revocation of the affected Certificate and provide immediate notice to the CA if the Signing Service's private key, or private key activation data, is compromised or believed to be compromised. The CA MUST revoke the affected Certificate upon request by the Signing Service or if the CA determines the Signing Service failed to notify the CA within 24 hours after identifying a suspected private key compromise.

Signing Authorities MUST obtain the Subscriber's commitment to:

1. Use such signing services solely for authorized purposes that comply with the Subscriber Agreement/Terms of Use, these Requirements, and all applicable laws,
2. Not knowingly submit software for signature that contains Suspect Code, and
3. Inform the Signing Service if it is discovered (by whatever means) that code submitted to the Signing Service for signature contained malware or a serious vulnerability.

11. Verification Practices

11.1 Verification of Organizational Applicants

Prior to issuing a Code Signing Certificate to an Organizational Applicant, the Issuer MUST:

1. Verify the Subject's legal identity, including any DBA proposed for inclusion in a Certificate, in accordance with Section 11.1.1 and 11.1.2 of this document,
2. Verify the Subject's address in accordance with Section 11.1.1 of this document,
3. Verify the Certificate Requester's authority to request a Code Signing Certificate and the authenticity of the Certificate Request using a Reliable Method of Communication in accordance with BR Section 11.2.3, and
4. If the Subject's or Subject's Affiliate's, Parent Company's, or Subsidiary Company's date of formation, as indicated by either a QIIS or QGIS, was less than three years prior to the date of the Certificate Request, verify the identity of the Certificate Requester.

11.1.1 Organization Identity and Address

As specified in BR Section 11.2.1. The CA MUST also obtain, whenever available, a specific Registration Identifier assigned to the Applicant by a government agency in the jurisdiction of the Applicant's legal creation, existence, or recognition.

11.1.2 DBA/Tradename

As specified in BR Section 11.2.2.

11.1.3 Requester Authority

As specified in BR Section 11.2.3.

11.2 Verification of Individual Applicants

Prior to issuing a Code Signing Certificate to an Individual Applicant, the CA MUST:

1. Verify the Subject's identity using a government photo ID under Section 11.2.1 of this document, and
2. Verify the authenticity of the government photo ID under Section 11.2.2 of this document.

11.2.1 Individual Identity

The CA MUST verify the Applicant's identity using one of the following processes:

1. The CA MUST obtain a legible copy, which discernibly shows the Requester's face, of at least one currently valid government-issued photo ID (passport, driver's license, military ID, national ID, or equivalent document type). The CA MUST inspect the copy for any indication of alteration or falsification. The CA MUST also verify the address of the

Requester using (i) a government-issued photo ID, (ii) a QIIS or QGIS, or (iii) an access code to activate the Certificate where the access code was physically mailed to the Requester;
OR

2. The CA MUST have the Requester digitally sign the Certificate Request using a valid personal Certificate that was issued under one of the following adopted standards: Qualified Certificates issued pursuant to ETSI TS 101 862, IGTF, Adobe Signing Certificate issued under the AATL or CDS program, the Kantara identity assurance framework at level 2, NIST SP 800-63 at level 2, or the FBCA CP at Basic or higher assurance.

11.2.2 Authenticity of Identity

The CA MUST verify the authenticity of the Certificate Request using one of the following:

1. Having the Requester provide a photo of the Requester holding the submitted government-issued photo ID where the photo is of sufficient quality to read both the name listed on the photo ID and the issuing authority; OR
2. Having the CA perform an in-person or web camera-based verification of the Requester where an employee or contractor of the CA can see the Requester, review the Requester's photo ID, and confirm that the Requester is the individual identified in the submitted photo ID; OR
3. Having the CA obtain an executed Declaration of Identity of the Requester that includes at least one unique biometric identifier (such as a fingerprint or handwritten signature). The CA MUST confirm the document's authenticity directly with the Verifying Person using contact information confirmed with a QIIS or QGIS; OR
4. Verifying that the digital signature used to sign the Request under Section 11.2.1(2) is a valid signature and originated from a Certificate issued at the appropriate level of assurance as evidenced by the certificate chain. Acceptable verification under this section includes validation that the Certificate was issued by a CA qualified by the entity responsible for adopting, enforcing, or maintaining the adopted standard and chains to an intermediate certificate or root certificate designated as complying with such standard.

11.3 Age of Certificate Data

As specified in BR Section 11.3.

11.4 Denied List

As specified in BR Section 11.4.

11.5 High Risk Certificate Requests

In addition to the procedures required by BR Section 11.5, prior to issuing a Code Signing Certificate, each CA MUST check at least one database containing information about known or suspected producers, publishers, or distributors of Suspect Code, as identified or indicated by an Anti-Malware Organization. The CA MUST determine whether the entity is identified as requesting a Code Signing Certificate from a High Risk Region of Concern. The CA MUST also maintain and

check an internal database listing Certificates revoked due to Signatures on Suspect Code and previous certificate requests rejected by the CA.

A CA identifying a high risk application under this section MUST follow the additional procedures defined in Section 11.7 of this document to ensure that the applicant will protect its Private Keys and not sign Suspect Code.

[These requirements do not specify a particular database and leave the decision of qualifying databases to the implementers.]

11.6 Data Source Accuracy

As specified in BR Section 11.6.

11.7 Processing High Risk Applications

CAs MUST not issue new or replacement Code Signing Certificates to an entity that the CA determined intentionally signed Suspect Code. The CA MUST keep meta-data about the reason for revoking a Code Signing Certificate as proof that the Code Signing Certificate was not revoked because the Applicant was intentionally signing Suspect Code.

CAs MAY issue new or replacement Code Signing Certificates to an entity who is the victim of a documented Takeover Attack, resulting in either a loss of control of their code-signing service or loss of the Private Key associated with their Code Signing Certificate.

If the CA is aware that the Applicant was the victim of a Takeover Attack, the CA MUST verify that the Applicant is protecting its Code Signing Private Keys under Section 16.3(1) or Section 16.3(2). The CA MUST verify the Applicant's compliance with Section 16.3(1) or Section 16.3(2) (i) through technical means that confirm the Private Keys are protected using the method described in 16.3(1) or 16.3.2(2) or (ii) by relying on a report provided by the Applicant that is signed by an auditor who is approved by the CA and who has IT and security training or is a CISA.

Documentation of a Takeover Attack MAY include a police report (validated by the CA) or public news report that admits that the attack took place. The Subscriber MUST provide a report from an auditor with IT and security training or a CISA that provides information on how the Subscriber was storing and using Private keys and how the intended solution for better security meets the guidelines for improved security.

Except where issuance is expressly authorized by the Application Software Supplier, CAs MUST not issue new Code Signing Certificates to an entity where the CA is aware that the entity has been the victim of two Takeover Attacks or where the CA is aware that entity breached a requirement under this Section to protect Private Keys under either Section 16.3(1) or 16.3(2).

11.8 Due Diligence

1. The results of the verification processes and procedures outlined in these Requirements are intended to be viewed both individually and as a group. Thus, after all of the verification processes and procedures are completed, the CA MUST have a person who is not responsible for the collection of information review all of the information and

documentation assembled in support of the Code Signing Certificate application and look for discrepancies or other details requiring further explanation.

2. The CA MUST obtain and document further explanation or clarification from Applicant and other sources of information, as necessary, to resolve those discrepancies or details that require further explanation.
3. The CA MUST refrain from issuing a Code Signing Certificate until all of the information and documentation assembled in support of the Certificate is such that issuance of the Certificate will not communicate factual information that the CA knows, or with the exercise of due diligence should discover from the assembled information and documentation, to be inaccurate. If satisfactory explanation and/or additional documentation are not received within a reasonable time, the CA MUST decline the Certificate request and SHOULD notify the Applicant accordingly.

12. Certificate Issuance by a Root CA

Certificate issuance by the Root CA MUST require an individual authorized by the CA (i.e. the CA system operator, system officer, or PKI administrator) to deliberately issue a direct command in order for the Root CA to perform a certificate signing operation.

Root CA Private Keys MUST NOT be used to directly sign Certificates.

13. Certificate Revocation and Status Checking

13.1 Revocation

13.1.1 Revocation Request

As specified in BR Section 13.1.1.

13.1.2 Certificate Problem Reporting

The CA MUST provide Anti-Malware Organizations, Subscribers, Relying Parties, Application Software Suppliers, and other third parties with clear instructions on how they can report suspected Private Key Compromise, Certificate misuse, Certificates used to sign Suspect Code, Takeover Attacks, or other types of possible fraud, compromise, misuse, inappropriate conduct, or any other matter related to Certificates. The CA MUST publicly disclose the instructions on its website.

13.1.3 Investigation

The CA MUST begin investigating Certificate Problem Reports within twenty-four hours of receipt, and decide whether revocation or other appropriate action is warranted based on at least the following criteria:

1. The nature of the alleged problem (adware, spyware, malware, software bug, etc.),
2. The number of Certificate Problem Reports received about a particular Certificate or Subscriber,

3. The entity making the report (for example, a notification from an Anti-Malware Organization or law enforcement agency carries more weight than an anonymous complaint), and
4. Relevant legislation.

13.1.4 Response

The CA MUST maintain a continuous 24x7 ability to communicate with Anti-Malware Organizations, Application Software Suppliers, and law enforcement agencies and respond to high-priority Certificate Problem Reports, such as reports requesting revocation of Certificates used to sign malicious code, fraud, or other illegal conduct.

The CA MUST acknowledge receipt of plausible notices about Suspect Code signed with a certificate issued by the CA or a Subordinate CA.

13.1.5 Reasons for Revoking a Subscriber Certificate

The CA MUST revoke a Code Signing Certificate within 24 hours if one or more of the following occurs:

1. The Subscriber requests in writing that the CA revoke the Certificate or notifies the CA that the original certificate request was not authorized and does not retroactively grant authorization.
2. The CA obtains evidence that the Subscriber's Private Key corresponding to the Public Key in the Certificate suffered a Key Compromise, including if the Subscriber failed to protect against any unauthorized access (also see Section 10.3.2, Subscriber Agreement Requirements).
3. The CA obtains evidence that the Certificate was misused, including use of a Certificate to sign Suspect Code.
4. The CA obtains evidence that a Subscriber has violated one or more of its material obligations under the Subscriber Agreement or Terms of Use.
5. The CA obtains evidence of a material change in the information contained in the Certificate or that any information appearing in the Certificate is inaccurate or misleading.
6. The CA obtains evidence that the Certificate was not issued in accordance with these Requirements or the CA's Certificate Policy or Certification Practice Statement.
7. The CA ceases operations for any reason and has not made arrangements for another CA to provide revocation support for the Certificate.
8. The CA's right to issue Certificates under these Requirements expires or is revoked or terminated, unless the CA has made arrangements to continue maintaining the CRL/OCSP Repository.
9. The CA obtains evidence of a possible compromise of the Private Key of a CA used for issuing the Certificate.

10. Revocation is required by the CA's Certificate Policy and/or Certification Practice Statement. OR:
11. The technical content or format of the Certificate presents an unacceptable risk to Application Software Suppliers or Relying Parties (e.g. the CA/Browser Forum might determine that a deprecated cryptographic/signature algorithm or key size presents an unacceptable risk and that such Certificates should be revoked and replaced by CAs within a given period of time).

A CA revoking a Certificate because the Certificate was associated with signed Suspect Code or other fraudulent or illegal conduct SHOULD provide all relevant information and risk indicators to other CAs or industry groups. The CA SHOULD indicate whether its investigation found that the Suspect Code was a false positive or an inadvertent signing.

13.1.6 Reasons for Revoking a Subordinate CA Certificate

As specified in BR Section 13.1.6.

13.1.7 Certificate Revocation Date

When revoking a Certificate, the CA SHOULD work with the Subscriber to estimate a date of when the revocation should occur in order to mitigate the impact of revocation on validly signed Code. For key compromise events, this date SHOULD be the earliest date of suspected compromise.

13.2 *Certificate Status Checking*

In addition to the requirements specified in BR Section 13.2, CAs MUST provide up-to-date revocation status information. CAs MUST provide OCSP responses for Code Signing Certificates and Timestamp Certificates for the time period specified in their CPS, which MUST be at least 10 years after the expiration of the certificate. If a CA issues CRLs, the serial number of a revoked certificate MUST remain on the CRL for at least 10 years after the expiration of the certificate. Application Software Suppliers MAY require the CA to support a longer life-time in its contract with the CA. If the CA wishes to stop supporting validation of Code Signing Certificates or Timestamp Certificates prior to the date specified in its Certificate Policy/Certificate Practice Statement, the CA MUST give 90 days' prior notice to all Application Software Suppliers relying on the root certificate and permit the Application Software Suppliers sufficient time to take appropriate action as determined by the Application Software Supplier.

If a Code Signing Certificate contains the Lifetime Signing OID, the Signature becomes invalid when the Code Signing Certificate expires, even if the Signature is timestamped. Because the Lifetime Signing OID is intended to be used with test purposes only, a CA MAY cease maintaining revocation information for a Code Signing Certificate with the Lifetime Signing OID after the Code Signing Certificate expires.

Whenever practical, Platforms should check the revocation status of the Certificates that they rely upon. However, this is not always practical, such as when signed Code is loaded earlier in the boot sequence than the network communication stack.

In the timestamp model, the Platform SHOULD check the revocation status at the time the time-stamp was applied. In addition to checking revocation status, where practical, Platforms SHOULD consult blacklists for Suspect Code.

A Certificate MAY have a one-to-one relationship or one-to-many relationship with the signed Code. Regardless, revocation of a Certificate may invalidate the signatures on all those signed Objects, some of which could be perfectly sound. Because of this, the CA MAY specify a revocation date in a CRL or OCSP response to time-bind the set of software affected by the revocation, and software SHOULD continue to treat objects containing a time-stamp dated before the revocation date as valid.

Because some Application Software Suppliers utilize non-standard revocation mechanisms, CAs MUST, if requested by the Application Software Supplier and using a method of communication specified by the Application Software Vendor, notify the Application Software Supplier whenever the CA revokes a Code Signing Certificate because (i) the CA mis-issued the Certificate, (ii) the Certificate was used to sign Suspect Code, or (iii) there is a suspected or actual compromise of the Applicant's or CA's Private Key.

14. Employees and Third Parties

14.1 Trustworthiness and Competence

As specified in BR Section 14.1.

14.2 Delegation of Functions to Registration Authorities and Subcontractors

14.2.1 General

Except as stated in Section 14.2.2 of this document, the CA MAY delegate the performance of all, or any part, of Section 11 of these Requirements to a Delegated Third Party, provided that the process as a whole fulfills all of the requirements of Section 10.3.3 of this document.

Before the CA authorizes a Delegated Third Party to perform a delegated function, the CA MUST contractually require the Delegated Third Party to:

1. Meet the qualification requirements of BR Section 14.1 when applicable to the delegated function,
2. Retain documentation in accordance with BR Section 15,
3. Abide by the other provisions of these Requirements that are applicable to the delegated function, and
4. Comply with (a) the CA's Certificate Policy/Certification Practice Statement or (b) the Delegated Third Party's practice statement that the CA has verified complies with these Requirements.

The CA MUST verify that the Signing Service and any other Delegated Third Party's personnel involved in the issuance of a Certificate meet the training and skills requirements of Section 14 of this document and the document retention and event logging requirements of Section 15 of this document.

If a Delegated Third Party fulfills any of the CA's obligations under Section 11.5 (High Risk Requests) of this document, the CA MUST verify that the process used by the Delegated Third Party to identify and further verify High Risk Certificate Requests provides at least the same level of assurance as the CA's own processes.

14.2.2 Compliance Obligation

In all cases, the CA MUST contractually obligate each Delegated Third Party to comply with all applicable requirements in these Requirements and to perform them as required of the CA itself. The CA MUST enforce these obligations and internally audit each Delegated Third Party's compliance with these Requirements on an annual basis.

14.2.3 Allocation of Liability

As specified in Section BR 14.2.3.

14.2.4 Enterprise RAs

The CA MAY designate an Enterprise RA to verify certificate requests from the Enterprise RA's own organization.

15. Data Records

As specified in BR Section 15. In addition, the Timestamp Authority MUST log the following information:

1. All data related to the creation of a timestamp, including all requests for a time-stamp, the connecting IP, and results of the timestamp,
2. Physical or remote access to a timestamp server, including the time of the access and the identity of the individual accessing the server,
3. History of the timestamp server configuration,
4. Any attempt to delete or modify timestamp logs,
5. Security messages received by the timestamp server,
6. Revocation of a timestamp certificate,
7. Major changes to the timestamp server's time,
8. System startup and shutdown, and
9. Equipment failures or malfunctions.

16. Data Security and Private Key Protection

The requirements in BR Section 16 apply equally to Code Signing Certificates. In addition:

16.1 *Timestamp Authority Key Protection*

1. Each CA MUST operate a Timestamp Authority that is available for use by customers of its Code Signing Certificates. CAs MUST recommend to Subscribers that they use the CA's Timestamping Authority to time-stamp signed code.
2. A Timestamp Authority MUST protect its signing key using a process that is at least to FIPS 140-2 Level 3, Common Criteria EAL 4+ (ALC_FLR.2), or higher. The CA MUST protect its signing operations in accordance with the CA/Browser Forum's Network Security Guidelines. Any changes to its signing process MUST be an auditable event.
3. The Timestamp Authority MUST ensure that clock synchronization is maintained when a leap second occurs. An Timestamp Authority MUST synchronize its timestamp server at least every 24 hours with a UTC(k) time source. The timestamp server MUST automatically detect and report on clock drifts or jumps out of synchronization with UTC. Clock adjustments of one second or greater MUST be auditable events.

16.2 *Signing Service Requirements*

The Signing Service MUST ensure that a Subscriber's private key is generated, stored, and used in a secure environment that has controls to prevent theft or misuse. A Signing Service MUST enforce multi-factor authentication to access and authorize Code Signing and obtain a representation from the Subscriber that they will securely store the tokens required for multi-factor access. A system used to host a Signing Service MUST NOT be used for web browsing. The Signing Service MUST run a regularly updated antivirus solution to scan the service for possible virus infection. The Signing Service MUST comply with the Network Security Guidelines as a "Delegated Third Party".

16.3 *Subscriber Private Key Protection*

The CA MUST obtain a representation from the Subscriber that the Subscriber will use one of the following options to generate and protect their Code Signing Certificate private keys:

1. A Trusted Platform Module (TPM) that generates and secures a key pair and that can document the Subscriber's private key protection through a TPM key attestation.
2. A hardware crypto module with a unit design form factor certified as conforming to at least FIPS 140 Level 2, Common Criteria EAL 4+, or equivalent.
3. Another type of hardware storage token with a unit design form factor of SD Card or USB token (not necessarily certified as conformant with FIPS 140 Level 2 or Common Criteria EAL 4+). The Subscriber MUST also warrant that it will keep the token physically separate from the device that hosts the code signing function until a signing session is begun.

A CA MUST recommend that the Subscriber protect Private Keys using the method described in Section 16.3(1) or 16.3(2) over the method described in Section 16.3(3) and obligate the Subscriber to protect Private Keys in accordance with 10.3.2(2).

17. Audit

17.1 Eligible Audit Schemes

The CA SHALL undergo a conformity assessment audit for compliance with these Requirements performed in accordance with one of the following schemes:

1. WebTrust for Certification Authorities v2.0;
2. A national scheme that audits conformance to ETSI TS 102 042;

Whichever scheme is chosen, it MUST incorporate periodic monitoring and/or accountability procedures to ensure that its audits continue to be conducted in accordance with the requirements of the scheme.

The audit MUST be conducted by a Qualified Auditor, as specified in BR Section 17.6.

17.2 Audit Period

As specified in BR Section 17.2.

17.3 Audit Report

As specified in BR Section 17.3.

17.4 Pre-Issuance Readiness Audit

If the CA has a currently valid Audit Report indicating compliance with an audit scheme listed in Section 17.1, then no pre-issuance readiness assessment is necessary.

If the CA does not have a currently valid Audit Report indicating compliance with one of the audit schemes listed in Section 17.1, then, before issuing Publicly-Trusted Certificates, the CA SHALL successfully complete a point-in-time readiness assessment performed in accordance with applicable standards under one of the audit schemes listed in Section 17.1. The point-in-time readiness assessment SHALL be completed no earlier than twelve (12) months prior to issuing Publicly-Trusted Certificates and SHALL be followed by a complete audit under such scheme within ninety (90) days of issuing the first Publicly-Trusted Certificate.

17.5 Audit of Delegated Functions

Audits MUST be conducted for all obligations under these Guidelines, including timestamping and signing services, regardless of whether they are performed directly by the CA or by a Delegated Third Party. Functions performed by a Delegated Third Party MUST be included in the CA's audit or the CA SHALL obtain an audit report from the Delegated Third Party. If the opinion is that the Delegated Third Party does not comply, then the CA SHALL not allow the Delegated Third Party to continue performing delegated functions.

The audit period for the Delegated Third Party SHALL NOT exceed one year (ideally aligned with the CA's audit).

17.6 Auditor Qualifications

As specified in BR Section 17.6.

17.7 Key Generation Ceremony

As specified in BR Section 17.7.

18. Liability and Indemnification

As specified in BR Section 18.

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Appendix A

Minimum Cryptographic Algorithm and Key Size Requirements

Certificates and Timestamp tokens issued after the effective date of these guidelines MUST meet the following requirements for algorithm type and key size.

(1) Root CA Certificates

	Expiration prior to January 1, 2031	Expiration on or after January 1, 2031
Digest algorithm	SHA-256, SHA-384 or SHA-512	SHA-256, SHA-384 or SHA-512
Minimum RSA modulus size (bits)	2048	3072
ECC curve	NIST P-256, P-384, or P-521	NIST P-256, P-384, or P-521
Minimum DSA modulus and divisor size (bits)	L= 2048, N= 224 or L= 2048, N= 256	L= 2048, N= 224 or L= 2048, N= 256

(2) Subordinate CA Certificates

	Expiration prior to January 1, 2031	Expiration on or after January 1, 2031
Digest algorithm	SHA-256, SHA-384 or SHA-512	SHA-256, SHA-384 or SHA-512
Minimum RSA modulus size (bits)	2048	3072
ECC curve	NIST P-256, P-384, or P-521	NIST P-256, P-384, or P-521
Minimum DSA modulus and divisor size (bits)	L= 2048, N= 224 or L= 2048, N= 256	L= 2048, N= 224 or L= 2048, N= 256

(3) Code Signing Certificates

	Expiration prior to January 1, 2031	Expiration on or after January 1, 2031

Digest algorithm	SHA-256, SHA-384 or SHA-512	SHA-256, SHA-384 or SHA-512
Minimum RSA modulus size (bits)	2048	3072
ECC curve	NIST P-256, P-384, or P-521	NIST P-256, P-384, or P-521
Minimum DSA modulus and divisor size (bits)	L= 2048, N= 224 or L= 2048, N= 256	L= 2048, N= 224 or L= 2048, N= 256

(4) Timestamp Certificates

TSA certificate chain must use algorithms and key sizes equivalent 10 years sooner than when an algorithm or key size should be retired.

	Issued prior to January 1, 2021	Issued on or after January 1, 2021
Digest algorithm	SHA-256, SHA-384 or SHA-512	SHA-256, SHA-384 or SHA-512
Minimum RSA modulus size (bits)	2048	3072
ECC curve	NIST P-256, P-384, or P-521	NIST P-256, P-384, or P-521
Minimum DSA modulus and divisor size (bits)	L= 2048, N= 224 or L= 2048, N= 256	L= 2048, N= 224 or L= 2048, N= 256

(5) Root Certificates and Subordinate Certificates of Timestamp Certificates Any Root CA Certificate or Subordinate CA Certificate from which Timestamp Certificates are issued must meet or exceed the cryptographic requirements of the Timestamp Certificate.

	Root or Subordinate CA Issued prior to January 1, 2021	Root or Subordinate CA Issued on or after January 1, 2021
Digest algorithm	SHA-256, SHA-384 or SHA-512	SHA-256, SHA-384 or SHA-512
Minimum RSA modulus size (bits)	2048	3072
ECC curve	NIST P-256, P-384, or P-521	NIST P-256, P-384, or P-521
Minimum DSA modulus and divisor	L= 2048, N= 224 or L= 2048, N= 256	L= 2048, N= 224 or L= 2048, N= 256

size (bits)		
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(6) Timestamp Tokens

The digest algorithms used to sign Timestamp tokens must match the digest algorithm used to sign the Timestamp Certificate.

	Generated prior to January 1, 2021	Generated on or after January 1, 2021
Digest algorithm	SHA-256, SHA-384 or SHA-512	SHA-256, SHA-384 or SHA-512

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Appendix B

Certificate Extensions (Normative)

This appendix specifies the requirements for extensions in Certificates issued after the date of these guidelines (including Subordinate CA certificates)

(1) Root CA Certificates

As specified in Appendix A of the General Baseline Requirements.

(2) Certificates for Subordinate CAs issuing Code Signing Certificates

A. certificatePolicies

This extension **MUST** be present and **SHOULD NOT** be marked critical.

certificatePolicies:policyIdentifier (Required)

If the certificate is issued to a Subordinate CA that is not an Affiliate of the entity that controls the Root CA, then the set of policy identifiers **MUST** include a Policy Identifier, defined by the Subordinate CA, which indicates a Certificate Policy asserting the Subordinate CA's adherence to and compliance with these Requirements.

The following fields **MUST** be present if the Subordinate CA is not an Affiliate of the entity that controls the Root CA.

certificatePolicies:policyQualifiers:policyQualifierId

- id-qt 1 [RFC 5280]

certificatePolicies:policyQualifiers:qualifier:cPSuri

- HTTP URL for the Root CA's Certification Practice Statement

B. cRLDistributionPoint

This extension **MUST** be present, **MUST NOT** be marked critical, and **MUST** contain the HTTP URL of the CA's CRL service.

C. authorityInformationAccess

This extension **MUST** be present and **MUST NOT** be marked critical. The extension **MUST** contain the HTTP URL of the CA's OCSP responder (accessMethod = 1.3.6.1.5.5.7.48.1), and/or the HTTP URL for the Root CA's certificate (accessMethod = 1.3.6.1.5.5.7.48.2).

D. basicConstraints

This extension **MUST** appear as a critical extension in all CA certificates that contain Public Keys used to validate digital signatures on certificates. The `cA` field **MUST** be set true. The `pathLenConstraint` field **MAY** be present.

E. `keyUsage`

This extension **MUST** be present and **MUST** be marked critical. Bit positions for `keyCertSign` and `cRLSign` **MUST** be set. If the Subordinate CA Private Key is used for signing OCSP responses, then the `digitalSignature` bit **MUST** be set.

F. `extkeyUsage` (EKU)

The `id-kp-codeSigning` [RFC5280] value **MUST** be present.

The following EKUs **MAY** be present: `documentSigning` and `emailProtection`.

The value `anyExtendedKeyUsage` (2.5.29.37.0) **MUST NOT** be present.

Other values **SHOULD NOT** be present. If any other value is present, the CA **MUST** have a business agreement with a Platform vendor requiring that EKU in order to issue a Platform-specific code signing certificate with that EKU.

This extension **SHOULD** be marked non-critical.

The CA **MUST** set all other fields and extensions in accordance to RFC 5280.

(3) Code Signing Certificates

A. `certificatePolicies`

This extension **MUST** be present and **SHOULD NOT** be marked critical.

`certificatePolicies:policyIdentifier` (Required)

- A Policy Identifier, defined by the Issuer, that indicates a Certificate Policy asserting the Issuer's adherence to and compliance with these Requirements.

`certificatePolicies:policyQualifiers:policyQualifierId` (Recommended)

- `id-qt 1` [RFC 5280]

`certificatePolicies:policyQualifiers:qualifier:cPSuri` (Optional)

- HTTP URL for the Subordinate CA's Certification Practice Statement

B. `cRLDistributionPoint`

This extension **MAY** be present. If present, it **MUST NOT** be marked critical, and it **MUST** contain the HTTP URL of the CA's CRL service.

C. `authorityInformationAccess`

This extension MUST be present and MUST NOT be marked critical. The extension MUST contain the HTTP URL of the CA's OCSP responder (accessMethod = 1.3.6.1.5.5.7.48.1) and the HTTP URL for the Root CA's certificate (accessMethod = 1.3.6.1.5.5.7.48.2).

D. basicConstraints (optional)

If present, the cA field MUST be set false.

E. keyUsage (required)

This extension MUST be present and MUST be marked critical. The bit positions for digitalSignature MUST be set. Bit positions for keyCertSign and cRLSign MUST NOT be set. All other bit positions SHOULD NOT be set.

F. extKeyUsage (EKU) (required)

The value id-kp-codeSigning [RFC5280] MUST be present.

The following EKUs MAY be present: documentSigning, lifetimeSigning, and emailProtection.

The value anyExtendedKeyUsage (2.5.29.37.0) MUST NOT be present.

Other values SHOULD NOT be present. If any other value is present, the CA MUST have a business agreement with a Platform vendor requiring that EKU in order to issue a Platform-specific code signing certificate with that EKU.

The CA MUST set all other fields and extensions in accordance to RFC 5280.

(4) Certificates for Subordinate CAs issuing Timestamp Certificates

A. certificatePolicies

This extension MUST be present and SHOULD NOT be marked critical.

certificatePolicies:policyIdentifier (Required)

If the certificate is issued to a Subordinate CA that is not an Affiliate of the entity that controls the Root CA, then the set of policy identifiers MUST include a Policy Identifier, defined by the Subordinate CA, which indicates a Certificate Policy asserting the Subordinate CA's adherence to and compliance with these Requirements.

The following fields MUST be present if the Subordinate CA is not an Affiliate of the entity that controls the Root CA.

certificatePolicies:policyQualifiers:policyQualifierId

- id-qt 1 [RFC 5280]

certificatePolicies:policyQualifiers:qualifier:cPSuri

- HTTP URL for the Root CA's Certification Practice Statement

B. `cRLDistributionPoint`

This extension MUST be present, MUST NOT be marked critical, and MUST contain the HTTP URL of the CA's CRL service.

C. `authorityInformationAccess`

This extension MUST be present and MUST NOT be marked critical. The extension MUST contain the HTTP URL of the CA's OCSP responder (`accessMethod = 1.3.6.1.5.5.7.48.1`), and/or the HTTP URL for the Root CA's certificate (`accessMethod = 1.3.6.1.5.5.7.48.2`).

D. `basicConstraints`

This extension MUST appear as a critical extension in all CA certificates that contain Public Keys used to validate digital signatures on certificates. The `cA` field MUST be set true. The `pathLenConstraint` field MAY be present.

E. `keyUsage`

This extension MUST be present and MUST be marked critical. Bit positions for `keyCertSign` and `cRLSign` MUST be set. If the Subordinate CA Private Key is used for signing OCSP responses, then the `digitalSignature` bit MUST be set.

F. `extkeyUsage` (EKU)

The `id-kp-timeStamping` [RFC5280] value MUST be present.

The value `anyExtendedKeyUsage` (2.5.29.37.0) MUST NOT be present.

Other values SHOULD NOT be present. If any other value is present, the CA MUST have a business agreement with a Platform vendor requiring that EKU in order to issue a Platform-specific code signing certificate with that EKU.

This extension SHOULD be marked non-critical.

The CA MUST set all other fields and extensions in accordance to RFC 5280.

(5) Timestamp Certificates

A. `certificatePolicies`

This extension MUST be present and SHOULD NOT be marked critical.

`certificatePolicies:policyIdentifier` (Required)

- A Policy Identifier, defined by the Issuer, that indicates a Certificate Policy asserting the Issuer's adherence to and compliance with these Requirements.

`certificatePolicies:policyQualifiers:policyQualifierId` (Recommended)

- id-qt 1 [RFC 5280]

certificatePolicies:policyQualifiers:qualifier:cPSuri (Optional)

- HTTP URL for the Subordinate CA's Certification Practice Statement

B. cRLDistributionPoint

This extension MAY be present. If present, it MUST NOT be marked critical, and it MUST contain the HTTP URL of the CA's CRL service.

C. authorityInformationAccess

This extension MUST be present and MUST NOT be marked critical. The extension MUST contain the HTTP URL of the CA's OCSP responder (accessMethod = 1.3.6.1.5.5.7.48.1) and the HTTP URL for the Root CA's certificate (accessMethod = 1.3.6.1.5.5.7.48.2).

D. basicConstraints (optional)

If present, the cA field MUST be set false.

E. keyUsage (required)

This extension MUST be present and MUST be marked critical. The bit positions for digitalSignature MUST be set. Bit positions for keyCertSign and cRLSign MUST NOT be set. All other bit positions SHOULD NOT be set.

F. extKeyUsage (EKU) (required)

The value id-kp-timeStamping [RFC5280] MUST be present.

The value anyExtendedKeyUsage (2.5.29.37.0) MUST NOT be present.

Other values SHOULD NOT be present. If any other value is present, the CA MUST have a business agreement with a Platform vendor requiring that EKU in order to issue a Platform-specific code signing certificate with that EKU.

The CA MUST set all other fields and extensions in accordance to RFC 5280.

Appendix C

User Agent Verification (Normative)

As specified in Appendix C of the General Baseline Requirements.

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APPENDIX D

HIGH RISK REGIONS OF CONCERN

The geographic locations listed below have more than 5% of the Code Signing Certificates for that location associated with signed Suspect Code when compared to the number of all Code Signing Certificates for that area. Applications originating or associated from one of these HRRCs are considered high risk and require additional verification as specified under Section 11.7 of this document:

NONE