



Payment Card Industry Data Security Standard

Attestation of Compliance for Report on Compliance – Service Providers

Version 4.0.1

Revision 2

Publication Date: August 2024

PCI DSS v4.0.1 Attestation of Compliance for Report on Compliance – Service Providers

Entity Name: TransactionIntel Application (TXi)

Assessment End Date: 2026-03-24

Date of Report as noted in the Report on Compliance: 2026-03-25

Section 1 Assessment Information

Instructions for Submission

This Attestation of Compliance (AOC) must be completed as a declaration of the results of the service provider’s assessment against the *Payment Card Industry Data Security Standard (PCI DSS) Requirements and Testing Procedures* (“Assessment”). Complete all sections. The service provider is responsible for ensuring that each section is completed by the relevant parties, as applicable. Contact the entity(ies) to which this AOC will be submitted for reporting and submission procedures.

This AOC reflects the results documented in an associated Report on Compliance (ROC). Associated ROC sections are noted in each AOC Part/Section below.

Capitalized terms used but not otherwise defined in this document have the meanings set forth in the PCI DSS Report on Compliance Template.

| Part 1. Contact Information | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------|
| Part 1a. Assessed Entity (ROC Section 1.1) | |
| Company name: | TransactionIntel Application (TXi) |
| DBA (doing business as): | N/A |
| Company mailing address: | Floor 4, Programme Bristol United Kingdom BS1 2LZ |
| Company main website: | https://www.nmi.com |
| Company contact name: | David Sage |
| Company contact title: | VP, SRE and Information Security |
| Contact phone number: | +1 (800) 617-4850 |
| Contact e-mail address: | security-compliance@nmi.com |
| Part 1b. Assessor (ROC Section 1.1) | |
| Provide the following information for all assessors involved in the Assessment. If there was no assessor for a given assessor type, enter Not Applicable | |
| PCI SSC Internal Security Assessor(s) | |
| ISA name(s): | N/A |
| Qualified Security Assessor | |
| Company name: | Foregenix Ltd |
| Company mailing address: | 1 Watts Barn Badbury Swindon Wiltshire SN4 0EU |

| | |
|------------------------------|-------------------------------------------------------------------|
| | United Kingdom |
| Company website: | https://www.foregenix.com |
| Lead Assessor name: | Daniel Ille |
| Assessor phone number: | +1 (720) 227-7688 |
| Assessor e-mail address: | dille@foregenix.com |
| Assessor certificate number: | 200-025 |

Part 2. Executive Summary

Part 2a. Scope Verification

Services that were **INCLUDED** in the scope of the Assessment (select all that apply):

| | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name of service(s) assessed: | TXi application | |
| Type of service(s) assessed: | | |
| Hosting Provider: <input type="checkbox"/> Applications / software <input type="checkbox"/> Hardware <input type="checkbox"/> Infrastructure / Network <input type="checkbox"/> Physical space (co-location) <input type="checkbox"/> Storage <input type="checkbox"/> Web <input type="checkbox"/> Security services <input type="checkbox"/> 3-D Secure Hosting Provider <input type="checkbox"/> Shared Hosting Provider <input type="checkbox"/> Other Hosting (specify): | Managed Services (specify): <input type="checkbox"/> Systems security services <input type="checkbox"/> IT support <input type="checkbox"/> Physical security <input type="checkbox"/> Terminal Management System <input checked="" type="checkbox"/> Other services (specify): Fraud scoring gateway service | Payment Processing: <input type="checkbox"/> POS / card present <input type="checkbox"/> Internet / e-commerce <input type="checkbox"/> MOTO / Call Center <input type="checkbox"/> ATM <input type="checkbox"/> Other processing (specify): |
| <input type="checkbox"/> Account Management | <input type="checkbox"/> Fraud and Chargeback | <input type="checkbox"/> Payment Gateway/Switch |
| <input type="checkbox"/> Back-Office Services | <input type="checkbox"/> Issuer Processing | <input type="checkbox"/> Prepaid Services |
| <input type="checkbox"/> Billing Management | <input type="checkbox"/> Loyalty Programs | <input type="checkbox"/> Records Management |
| <input type="checkbox"/> Clearing and Settlement | <input checked="" type="checkbox"/> Merchant Services | <input type="checkbox"/> Tax/Government Payments |
| <input type="checkbox"/> Network Provider | | |
| <input type="checkbox"/> Others (specify): Not applicable | | |

Note: These categories are provided for assistance only and are not intended to limit or predetermine an entity's service description. If these categories do not apply to the assessed service, complete "Others." If it is not clear whether a category could apply to the assessed service, consult with the entity(ies) to which this AOC will be submitted.

Part 2. Executive Summary (continued)

Part 2a. Scope Verification (continued)

Services that are provided by the service provider but were **NOT INCLUDED** in the scope of the Assessment (select all that apply):

| | | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| Name of service(s) not assessed: | | Not applicable | |
| Type of service(s) not assessed: | | | |
| Hosting Provider: <input type="checkbox"/> Applications / software <input type="checkbox"/> Hardware <input type="checkbox"/> Infrastructure / Network <input type="checkbox"/> Physical space (co-location) <input type="checkbox"/> Storage <input type="checkbox"/> Web <input type="checkbox"/> Security services <input type="checkbox"/> 3-D Secure Hosting Provider <input type="checkbox"/> Shared Hosting Provider <input type="checkbox"/> Other Hosting (specify): | | Managed Services (specify): <input type="checkbox"/> Systems security services <input type="checkbox"/> IT support <input type="checkbox"/> Physical security <input type="checkbox"/> Terminal Management System <input type="checkbox"/> Other services (specify): | |
| <input type="checkbox"/> Account Management <input type="checkbox"/> Back-Office Services <input type="checkbox"/> Billing Management <input type="checkbox"/> Clearing and Settlement <input type="checkbox"/> Network Provider <input type="checkbox"/> Others (specify): | | Payment Processing: <input type="checkbox"/> POS / card present <input type="checkbox"/> Internet / e-commerce <input type="checkbox"/> MOTO / Call Center <input type="checkbox"/> ATM <input type="checkbox"/> Other processing (specify): <input type="checkbox"/> Fraud and Chargeback <input type="checkbox"/> Issuer Processing <input type="checkbox"/> Loyalty Programs <input type="checkbox"/> Merchant Services <input type="checkbox"/> Payment Gateway/Switch <input type="checkbox"/> Prepaid Services <input type="checkbox"/> Records Management <input type="checkbox"/> Tax/Government Payments | |
| Provide a brief explanation why any checked services were not included in the Assessment: | | Not applicable | |

**Part 2b. Description of Role with Payment Cards
(ROC Section 2.1)**

| | |
|-------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p>Describe how the business stores, processes, and/or transmits account data.</p> | <p>Cardholder data (CHD) is received over HTTPS and/or SFTP via TLS v1.2 using strong cipher suites. Transactions are then subsequently transmitted to the upstream processors over IPsec VPN or TLS v1.2 connections. Communication to upstream processors is dependent solely on the direction of the processors and are out of scope of this assessment.</p> |
| <p>Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.</p> | <p>Not Applicable. TXi does not perform any other function that could impact the security of account data.</p> |
| <p>Describe system components that could impact the security of account data.</p> | <p>Not Applicable. TXi does not perform any other function that could impact the security of account data.</p> |

Part 2. Executive Summary *(continued)*

Part 2c. Description of Payment Card Environment

Provide a high-level description of the environment covered by this Assessment.

For example:

- *Connections into and out of the cardholder data environment (CDE).*
- *Critical system components within the CDE, such as POI devices, databases, web servers, etc., and any other necessary payment components, as applicable.*
- *System components that could impact the security of account data.*

Connections into the environment are web based over HTTPS using TLS v1.2 (with AES128/256-bit encryption) or via two factor authentication using soft tokens. The cardholder data environment (CDE) consists of VPCs containing GKE workloads, load balancers, web, application, and database servers.

Indicate whether the environment includes segmentation to reduce the scope of the Assessment.

(Refer to the "Segmentation" section of PCI DSS for guidance on segmentation)

Yes No

Part 2d. In-Scope Locations/Facilities (ROC Section 4.6)

List all types of physical locations/facilities (for example, corporate offices, data centers, call centers and mail rooms) in scope for this Assessment.

| Facility Type | Total Number of Locations (How many locations of this type are in scope) | Location(s) of Facility (city, country) |
|--------------------------------------------------|-----------------------------------------------------------------------------|----------------------------------------------------------------------|
| TXi is hosted within Google Cloud Platform (GCP) | 2 | US East 1 (Moncks Corner, SC, US) and US West 1 (The Dalles, OR, US) |

Part 2. Executive Summary *(continued)*

Part 2e. PCI SSC Validated Products and Solutions (ROC Section 3.3)

Does the entity use any item identified on any PCI SSC Lists of Validated Products and Solutions*?

Yes No

Provide the following information regarding each item the entity uses from PCI SSC's Lists of Validated Products and Solutions:

| Name of PCI SSC-validated Product or Solution | Version of Product or Solution | PCI SSC Standard to which Product or Solution Was Validated | PCI SSC Listing Reference Number | Expiry Date of Listing |
|-----------------------------------------------|--------------------------------|-------------------------------------------------------------|----------------------------------|------------------------|
| Not Applicable | Not Applicable | Not Applicable | Not Applicable | Not Applicable |

* For purposes of this document, "Lists of Validated Products and Solutions" means the lists of validated products, solutions, and/or components, appearing on the PCI SSC website (www.pcisecuritystandards.org) (for example, 3DS Software Development Kits, Approved PTS Devices, Validated Payment Software, Point to Point Encryption (P2PE) solutions, Software-Based PIN Entry on COTS (SPoC) solutions, Contactless Payments on COTS (CPoC) solutions), and Mobile Payments on COTS (MPoC) products.

Part 2. Executive Summary *(continued)*

Part 2f. Third-Party Service Providers (ROC Section 4.4)

For the services being validated, does the entity have relationships with one or more third-party service providers that:

- | | |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| <ul style="list-style-type: none"> • Store, process, or transmit account data on the entity's behalf (for example, payment gateways, payment processors, payment service providers (PSPs, and off-site storage)) | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| <ul style="list-style-type: none"> • Manage system components included in the entity's Assessment (for example, via network security control services, anti-malware services, security incident and event management (SIEM), contact and call centers, web-hosting companies, and IaaS, PaaS, SaaS, and FaaS cloud providers) | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| <ul style="list-style-type: none"> • Could impact the security of the entity's CDE (for example, vendors providing support via remote access, and/or bespoke software developers). | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |

If Yes:

| Name of Service Provider: | Description of Services Provided: |
|-----------------------------|-----------------------------------|
| Google Cloud Platform (GCP) | Cloud Hosting Provider |
| Datadog, Inc | Log management services |

Note: Requirement 12.8 applies to all entities in this list.

Part 2. Executive Summary (continued)

Part 2g. Summary of Assessment (ROC Section 1.8.1)

Indicate below all responses provided within each principal PCI DSS requirement.

For all requirements identified as either “Not Applicable” or “Not Tested,” complete the “Justification for Approach” table below.

Note: One table to be completed for each service covered by this AOC. Additional copies of this section are available on the PCI SSC website.

Name of Service Assessed: TXi application

| PCI DSS Requirement | Requirement Finding More than one response may be selected for a given requirement. Indicate all responses that apply. | | | | Select If Below Method(s) Was Used | |
|---------------------|---------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|--------------------------|------------------------------------|-------------------------------------|
| | In Place | Not Applicable | Not Tested | Not in Place | Customized Approach | Compensating Controls |
| Requirement 1: | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Requirement 2: | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Requirement 3: | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| Requirement 4: | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Requirement 5: | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Requirement 6: | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Requirement 7: | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Requirement 8: | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Requirement 9: | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Requirement 10: | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Requirement 11: | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Requirement 12: | <input checked="" type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Appendix A1: | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Appendix A2: | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Justification for Approach

For any Not Applicable responses, identify which sub-requirements were not applicable and the reason.

- 1.2.6 - Not Applicable - No insecure protocols, services and ports in use.
- 1.3.3 - Not Applicable - Wireless networks not used.
- 1.4.4 - Not Applicable - There is no storage of CHD.
- 2.2.5 - Not Applicable - No insecure ports, services or protocols in use.
- 2.3.1 - Not Applicable - Wireless networks not used.
- 2.3.2 - Not Applicable - Wireless networks not used.
- 3.1.1 - Not Applicable - Account data not stored.
- 3.1.2 - Not Applicable - Account data not stored.
- 3.2.1 - Not Applicable - Account data not stored.
- 3.3.1 - Not Applicable - SAD not received.
- 3.3.1.1 - Not Applicable - SAD not received.
- 3.3.1.2 - Not Applicable - SAD not received.
- 3.3.1.3 - Not Applicable - SAD not received.
- 3.3.2 - Not Applicable - SAD not received.
- 3.3.3 - Not Applicable - SAD not received, and assessed entity does not perform issuing functions.
- 3.4.1 - Not Applicable - PAN is not stored or displayed.
- 3.4.2 - Not Applicable - PAN is not stored.
- 3.5.1.2 - Not Applicable - PAN is not stored
- 3.5.1.3 - Not Applicable - PAN is not stored.
- 3.6.1 - Not Applicable - PAN is not stored.
- 3.6.1.1 - Not Applicable - PAN is not stored.
- 3.6.1.2 - Not Applicable - PAN is not stored.
- 3.6.1.3 - Not Applicable - PAN is not stored.
- 3.6.1.4 - Not Applicable - PAN is not stored.
- 3.7.1 - Not Applicable - PAN is not stored.
- 3.7.2 - Not Applicable - PAN is not stored.
- 3.7.3 - Not Applicable - PAN is not stored.
- 3.7.4 - Not Applicable - PAN is not stored.
- 3.7.5 - Not Applicable - PAN is not stored.
- 3.7.6 - Not Applicable - PAN is not stored.
- 3.7.7 - Not Applicable - PAN is not stored.
- 3.7.8 - Not Applicable - PAN is not stored.
- 3.7.9 - Not Applicable - PAN is not stored.
- 4.2.1.2 - Not Applicable - Wireless networks not used.
- 4.2.2 - Not Applicable - End-user messaging technologies not used.
- 5.3.2.1 - Not Applicable - Continuous behavioural analysis used by anti-malware software.
- 5.3.3 - Not Applicable - Continuous behavioural analysis used by anti-malware software.
- 6.4.1 - Not Applicable - This requirement has been superseded by 6.4.2.
- 6.4.3 - Not Applicable - No payment pages in use.
- 6.5.2 - Not Applicable - No significant changes.
- 7.2.6 - Not Applicable - Account data is not stored.

| | |
|------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | <p>8.2.3 - Not Applicable - No remote access to customers' premises.</p> <p>8.2.7 - Not Applicable - No remote access by third parties.</p> <p>8.3.10 - Not Applicable - This requirement has been superseded by 8.3.10.1.</p> <p>8.3.10.1 - Not Applicable - There is no customer access to CHD.</p> <p>8.6.1 - Not Applicable - System and application accounts are non-interactive.</p> <p>8.6.2 - Not Applicable - System and application accounts are non-interactive.</p> <p>9.4.1 - Not Applicable - No media with CHD in scope.</p> <p>9.4.1.1 - Not Applicable - No media with CHD in scope.</p> <p>9.4.1.2 - Not Applicable - No media with CHD in scope.</p> <p>9.4.2 - Not Applicable - No media with CHD in scope.</p> <p>9.4.3 - Not Applicable - No media with CHD in scope.</p> <p>9.4.4 - Not Applicable - No media with CHD in scope.</p> <p>9.4.5 - Not Applicable - No media with CHD in scope.</p> <p>9.4.5.1 - Not Applicable - No media with CHD in scope.</p> <p>9.4.6 - Not Applicable - No media with CHD in scope.</p> <p>9.4.7 - Not Applicable - No media with CHD in scope.</p> <p>9.5.1 - Not Applicable - No POIs in scope.</p> <p>9.5.1.1 - Not Applicable - No POIs in scope.</p> <p>9.5.1.2 - Not Applicable - No POIs in scope.</p> <p>9.5.1.2.1 - Not Applicable - No POIs in scope.</p> <p>9.5.1.3 - Not Applicable - No POIs in scope.</p> <p>10.4.2.1 - Not Applicable - All logs reviewed uniformly at the same frequency.</p> <p>10.7.1 - Not Applicable - Requirement superseded by 10.7.2.</p> <p>11.3.1.3 - Not Applicable - No significant changes.</p> <p>11.3.2.1 - Not Applicable - No significant changes.</p> <p>11.4.7 - Not Applicable - Not a multi-tenant service provider.</p> <p>11.6.1 - Not Applicable - No payment pages in use.</p> <p>12.3.2 - Not Applicable - Customized approach not used.</p> <p>A1.1.1 - Not Applicable - Not a multi-tenant service provider.</p> <p>A1.1.2 - Not Applicable - Not a multi-tenant service provider.</p> <p>A1.1.3 - Not Applicable - Not a multi-tenant service provider.</p> <p>A1.1.4 - Not Applicable - Not a multi-tenant service provider.</p> <p>A1.2.1 - Not Applicable - Not a multi-tenant service provider.</p> <p>A1.2.2 - Not Applicable - Not a multi-tenant service provider.</p> <p>A1.2.3 - Not Applicable - Not a multi-tenant service provider.</p> <p>A2.1.1 - Not Applicable - No POI devices in use.</p> <p>A2.1.2 - Not Applicable - No POI devices in use.</p> <p>A2.1.3 - Not Applicable - No POI devices in use.</p> |
| <p>For any Not Tested responses, identify which sub-requirements were not tested and the reason.</p> | <p>Not Applicable</p> |

Section 2 Report on Compliance

(ROC Sections 1.2 and 1.3.2)

| | |
|-----------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| Date Assessment began: Note: <i>This is the first date that evidence was gathered, or observations were made.</i> | 2026-03-02 |
| Date Assessment ended: Note: <i>This is the last date that evidence was gathered, or observations were made.</i> | 2026-03-24 |
| Were any requirements in the ROC unable to be met due to a legal constraint? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| Were any testing activities performed remotely? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

Section 3 Validation and Attestation Details

Part 3. PCI DSS Validation (ROC Section 1.7)

This AOC is based on results noted in the ROC dated *(Date of Report as noted in the ROC 2026-03-25)*.

Indicate below whether a full or partial PCI DSS assessment was completed:

- Full Assessment** – All requirements have been assessed and therefore no requirements were marked as Not Tested in the ROC.
- Partial Assessment** – One or more requirements have not been assessed and were therefore marked as Not Tested in the ROC. Any requirement not assessed is noted as Not Tested in Part 2g above.

Based on the results documented in the ROC noted above, each signatory identified in any of Parts 3b-3d, as applicable, assert(s) the following compliance status for the entity identified in Part 2 of this document (*select one*):

| <input checked="" type="checkbox"/> | <p>Compliant: All sections of the PCI DSS ROC are complete, and all assessed requirements are marked as being either 1) In Place, 2) In Place with Remediation, or 3) Not Applicable, resulting in an overall COMPLIANT rating; thereby TransactionIntel Application (TXi) has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above.</p> | | | | |
|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|---------------------------------------------------------------------|----------------|----------------|
| <input type="checkbox"/> | <p>Non-Compliant: Not all sections of the PCI DSS ROC are complete, or one or more requirements are marked as Not in Place, resulting in an overall NON-COMPLIANT rating; thereby TransactionIntel Application (TXi) has not demonstrated compliance with PCI DSS requirements.</p> <p>Target Date for Compliance:</p> <p>An entity submitting this form with a Non-Compliant status may be required to complete the Action Plan in Part 4 of this document. Confirm with the entity to which this AOC will be submitted before completing Part 4.</p> | | | | |
| <input type="checkbox"/> | <p>Compliant but with Legal exception: One or more assessed requirements in the ROC are marked as Not in Place due to a legal restriction that prevents the requirement from being met and all other assessed requirements are marked as being either 1) In Place, 2) In Place with Remediation, or 3) Not Applicable, resulting in an overall COMPLIANT BUT WITH LEGAL EXCEPTION rating; thereby TransactionIntel Application (TXi) has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above or as Not in Place due to a legal restriction.</p> <p>This option requires additional review from the entity to which this AOC will be submitted.</p> <p><i>If selected, complete the following:</i></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 30%;">Affected Requirement</th> <th>Details of how legal constraint prevents requirement from being met</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">Not Applicable</td> <td style="text-align: center;">Not Applicable</td> </tr> </tbody> </table> | Affected Requirement | Details of how legal constraint prevents requirement from being met | Not Applicable | Not Applicable |
| Affected Requirement | Details of how legal constraint prevents requirement from being met | | | | |
| Not Applicable | Not Applicable | | | | |

Part 3a. Service Provider Acknowledgement

Signatory(s) confirms:

(Select all that apply)

| | |
|-------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
| <input checked="" type="checkbox"/> | The ROC was completed according to <i>PCI DSS</i> , Version 4.0.1 and was completed according to the instructions therein. |
| <input checked="" type="checkbox"/> | All information within the above-referenced ROC and in this attestation fairly represents the results of the Assessment in all material respects. |
| <input checked="" type="checkbox"/> | PCI DSS controls will be maintained at all times, as applicable to the entity's environment. |

Part 3b. Service Provider Attestation



| | |
|-----------------------------------------------------|-----------------------------------------|
| Signature of Service Provider Executive Officer ↑ | Date: 03/31/2026 |
| Service Provider Executive Officer Name: David Sage | Title: VP, SRE and Information Security |

Part 3c. Qualified Security Assessor (QSA) Acknowledgement

If a QSA was involved or assisted with this Assessment, indicate the role performed:

QSA performed testing procedures.

QSA provided other assistance.

If selected, describe all role(s) performed:



| | |
|----------------------------|------------------|
| Signature of Lead QSA ↑ | Date: 03/31/2026 |
| Lead QSA Name: Daniel Ille | |



| | |
|-------------------------------------------------------|-----------------------------|
| Signature of Duly Authorized Officer of QSA Company ↑ | Date: 03/30/2026 |
| Duly Authorized Officer Name: Ricardo Dos Santos | QSA Company: Foregenix Ltd. |

Part 3d. PCI SSC Internal Security Assessor (ISA) Involvement

If an ISA(s) was involved or assisted with this Assessment, indicate the role performed:

ISA(s) performed testing procedures.

ISA(s) provided other assistance.

If selected, describe all role(s) performed:

Part 4. Action Plan for Non-Compliant Requirements

Only complete Part 4 upon request of the entity to which this AOC will be submitted, and only if the Assessment has Non-Compliant results noted in Section 3.

If asked to complete this section, select the appropriate response for “Compliant to PCI DSS Requirements” for each requirement below. For any “No” responses, include the date the entity expects to be compliant with the requirement and provide a brief description of the actions being taken to meet the requirement.

| PCI DSS Requirement | Description of Requirement | Compliant to PCI DSS Requirements (Select One) | | Remediation Date and Actions (If “NO” selected for any Requirement) |
|---------------------|----------------------------------------------------------------------------------------------------------------|---------------------------------------------------|--------------------------|------------------------------------------------------------------------|
| | | YES | NO | |
| 1 | Install and maintain network security controls | <input type="checkbox"/> | <input type="checkbox"/> | |
| 2 | Apply secure configurations to all system components | <input type="checkbox"/> | <input type="checkbox"/> | |
| 3 | Protect stored account data | <input type="checkbox"/> | <input type="checkbox"/> | |
| 4 | Protect cardholder data with strong cryptography during transmission over open, public networks | <input type="checkbox"/> | <input type="checkbox"/> | |
| 5 | Protect all systems and networks from malicious software | <input type="checkbox"/> | <input type="checkbox"/> | |
| 6 | Develop and maintain secure systems and software | <input type="checkbox"/> | <input type="checkbox"/> | |
| 7 | Restrict access to system components and cardholder data by business need to know | <input type="checkbox"/> | <input type="checkbox"/> | |
| 8 | Identify users and authenticate access to system components | <input type="checkbox"/> | <input type="checkbox"/> | |
| 9 | Restrict physical access to cardholder data | <input type="checkbox"/> | <input type="checkbox"/> | |
| 10 | Log and monitor all access to system components and cardholder data | <input type="checkbox"/> | <input type="checkbox"/> | |
| 11 | Test security systems and networks regularly | <input type="checkbox"/> | <input type="checkbox"/> | |
| 12 | Support information security with organizational policies and programs | <input type="checkbox"/> | <input type="checkbox"/> | |
| Appendix A1 | Additional PCI DSS Requirements for Multi-Tenant Service Providers | <input type="checkbox"/> | <input type="checkbox"/> | |
| Appendix A2 | Additional PCI DSS Requirements for Entities using SSL/early TLS for Card-Present POS POI Terminal Connections | <input type="checkbox"/> | <input type="checkbox"/> | |

Note: The PCI Security Standards Council is a global standards body that provides resources for payment security professionals developed collaboratively with our stakeholder community. Our materials are accepted in numerous compliance programs worldwide. Please check with your individual compliance accepting organization to ensure that this form is acceptable in their program. For more information about PCI SSC and our stakeholder community please visit: https://www.pcisecuritystandards.org/about_us/