



**Report on Siemens Industry
Software, Inc.'s Xcelerator as a
Service Enterprise Core Relevant to
Security, Availability, and
Confidentiality Throughout the Period
April 1, 2023 to March 31, 2024**

SOC 3® - SOC for Service Organizations: Trust Services Criteria for
General Use Report Prepared in Accordance with the AICPA SSAE No.18
and 21 and IAASB ISAE 3000 Standards

SIEMENS

Table of Contents

Section 1

Independent Service Auditor's Report 3

Section 2

Assertion of Siemens Industry Software, Inc. Management 6

Attachment A

Siemens Industry Software, Inc.'s Description of the Boundaries of Its Xcelerator as a Service
Enterprise Core 8

Attachment B

Principal Service Commitments and System Requirements 15

Attachment C

Other Information Provided by Siemens Industry Software, Inc. That Is Not Covered by the
Service Auditor's Report 18

Section 1

Independent Service Auditor's Report

Independent Service Auditor's Report

To: Siemens Industry Software, Inc. ("Siemens")

Scope

We have examined Siemens' accompanying assertion titled "Assertion of Siemens Industry Software, Inc. Management" (assertion) that the controls within Siemens' Xcelerator as a Service Enterprise Core (system) were effective throughout the period April 1, 2023 to March 31, 2024, to provide reasonable assurance that Siemens' service commitments and system requirements were achieved based on the trust services criteria relevant to security, availability, and confidentiality (applicable trust services criteria) set forth in TSP Section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy (With Revised Points of Focus—2022)* (2017 TSC).

Siemens uses a subservice organization to provide data center colocation services. The description of the boundaries of the system indicates that complementary subservice organization controls that are suitably designed and operating effectively are necessary, along with controls at Siemens, to achieve Siemens' service commitments and system requirements based on the applicable trust services criteria. The description of the boundaries of the system presents the types of complementary subservice organization controls assumed in the design of Siemens' controls. Our examination did not include the services provided by the subservice organization, and we have not evaluated the suitability of the design or operating effectiveness of such complementary subservice organization controls.

The information included in attachment C, "Other Information Provided by Siemens Industry Software, Inc. That Is Not Covered by the Service Auditor's Report," is presented by Siemens' management to provide additional information and is not a part of Siemens' description of the boundaries of Xcelerator as a Service Enterprise Core made available to user entities during the period April 1, 2023 to March 31, 2024. Information included regarding ISO 27001, ISO 27017 and ISO 27018 has not been subjected to the procedures applied in the examination and, accordingly, we express no opinion on it.

Service Organization's Responsibilities

Siemens is responsible for its service commitments and system requirements and for designing, implementing, and operating effective controls within the system to provide reasonable assurance that Siemens' service commitments and system requirements were achieved. Siemens has also provided the accompanying assertion about the effectiveness of controls within the system. When preparing its assertion, Siemens is responsible for selecting, and identifying in its assertion, the applicable trust service criteria and for having a reasonable basis for its assertion by performing an assessment of the effectiveness of the controls within the system.

Service Auditor's Responsibilities

Our responsibility is to express an opinion, based on our examination, on management's assertion that controls within the system were effective throughout the period to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria. Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA) and in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised), *Assurance Engagements Other Than Audits or Reviews of Historical Financial Information*, issued by the International Auditing and Assurance Standards Board (IAASB). Those standards require that we plan and perform our examination

to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Our examination included:

- Obtaining an understanding of the system and the service organization's service commitments and system requirements.
- Assessing the risks that controls were not effective to achieve Siemens' service commitments and system requirements based on the applicable trust services criteria.
- Performing procedures to obtain evidence about whether controls within the system were effective to achieve Siemens' service commitments and system requirements based on the applicable trust services criteria.

Our examination also included performing such other procedures as we considered necessary in the circumstances.

Service Auditor's Independence and Quality Control

We have complied with the independence and other ethical requirements of the Code of Professional Conduct established by the AICPA.

We applied the Statements on Quality Control Standards established by the AICPA and, accordingly, maintain a comprehensive system of quality control.

Inherent Limitations

There are inherent limitations in the effectiveness of any system of internal control, including the possibility of human error and the circumvention of controls.

Because of their nature, controls may not always operate effectively to provide reasonable assurance that the service organization's service commitments and system requirements were achieved based on the applicable trust services criteria. Also, the projection to the future of any conclusions about the effectiveness of controls is subject to the risk that controls may become inadequate because of changes in conditions or that the degree of compliance with the policies or procedures may deteriorate.

Opinion

In our opinion, management's assertion that the controls within Siemens' Xcelerator as a Service Enterprise Core were effective throughout the period April 1, 2023 to March 31, 2024, to provide reasonable assurance that Siemens' service commitments and system requirements were achieved based on the applicable trust services criteria if complementary subservice organization controls assumed in the design of Siemens' controls operated effectively throughout that period is fairly stated, in all material respects.

Coalfire Controls LLC

Greenwood Village, Colorado
July 30, 2024

Section 2

Assertion of Siemens Industry Software, Inc. Management

Assertion of Siemens Industry Software, Inc. (“Siemens”) Management

We are responsible for designing, implementing, operating and maintaining effective controls within Siemens’ Xcelerator as a Service Enterprise Core (system) throughout the period April 1, 2023 to March 31, 2024, to provide reasonable assurance that Siemens’ service commitments and system requirements were achieved based on the trust services criteria relevant to security, availability, and confidentiality (applicable trust services criteria) set forth in TSP Section 100, *2017 Trust Services Criteria for Security, Availability, Processing Integrity, Confidentiality, and Privacy (With Revised Points of Focus—2022)* (2017 TSC). Our description of the boundaries of the system is presented in attachment A and identifies the aspects of the system covered by our assertion.

Siemens uses a subservice organization for data center colocation services. The description of the boundaries of the system indicates that complementary subservice organization controls that are suitably designed and operating effectively are necessary, along with controls at Siemens, to achieve Siemens’ service commitments and system requirements based on the applicable trust services criteria. The description of the boundaries of the system presents the types of complementary subservice organization controls assumed in the design of Siemens’ controls. The description of the boundaries of the system does not disclose the actual controls at the subservice organization.

We have performed an evaluation of the effectiveness of the controls within the system throughout the period April 1, 2023 to March 31, 2024, to provide reasonable assurance that Siemens’ service commitments and system requirements were achieved based on the applicable trust services criteria if complementary subservice organization controls assumed in the design of Siemens’ controls operated effectively throughout that period. Siemens’ objectives for the system in applying the applicable trust services criteria are embodied in its service commitments and system requirements relevant to the applicable trust services criteria. The principal service commitments and system requirements related to the applicable trust services criteria are presented in attachment B.

There are inherent limitations in any system of internal control, including the possibility of human error and the circumvention of controls. Because of these inherent limitations, a service organization may achieve reasonable, but not absolute, assurance that its service commitments and system requirements are achieved.

We assert that the controls within the system were effective throughout the period April 1, 2023 to March 31, 2024, to provide reasonable assurance that Siemens’ service commitments and system requirements were achieved based on the applicable trust services criteria.

Siemens Industry Software, Inc.

Attachment A

Siemens Industry Software, Inc.'s Description of the Boundaries of Its Xcelerator as a Service Enterprise Core

Type of Services Provided

Siemens Industry Software, Inc. (“SISW” or “the Company”), headquartered in Plano, Texas, provides software and services across industry domains to allow businesses to become more agile, flexible, and adaptable. SISW’s Siemens Xcelerator as a Service offering is a comprehensive and integrated portfolio of engineering software, services, and an application development platform developed to enhance electronic and mechanical design, system simulation, manufacturing, operations, and life cycle analytics. The Xcelerator as a Service suite of services includes the Xcelerator as a Service Enterprise Core, which offers individuals the ability to securely collaborate, store, share, and modify files in the cloud.

The boundaries of the system in this section details Xcelerator as a Service Enterprise Core. No other Company services are not within the scope of this report.

The Boundaries of the System Used to Provide the Services

The boundaries of Xcelerator as a Service Enterprise Core are the specific aspects of the Company’s infrastructure, software, people, procedures, and data necessary to provide its services and that directly support the services provided to customers. Any infrastructure, software, people, procedures, and data that indirectly support the services provided to customers are not included within the boundaries of Xcelerator as a Service Enterprise Core.

The components that directly support the services provided to customers are described in the subsections below.

Infrastructure

The Company utilizes Amazon Web Services (AWS) to provide the resources to host Xcelerator as a Service Enterprise Core. The Company leverages the experience and resources of AWS to scale quickly and securely as necessary to meet current and future demand. However, the Company is responsible for designing and configuring the Xcelerator as a Service Enterprise Core architecture within AWS to ensure the availability, security, and resiliency requirements are met.

The Company also leverages Auth0’s authentication services platform to provide external identity management services and has a fully dedicated, internal team in place that is responsible for implementing configurations to provide the scalability and resiliency required.

The in-scope hosted infrastructure also consists of multiple supporting tools, as shown in the table below:

Infrastructure	
Production Tool	Business Function
AWS Identity and Access Management (IAM)	Identity and access management
Auth0	IAM
Amazon Elastic Kubernetes Service (EKS)	Container hosting environment
Amazon Simple Storage Service (S3), Amazon Relational Database Service (RDS), Amazon DocumentDB	Database, data storage services

Infrastructure	
Production Tool	Business Function
Cloud Custodian	Policy management
Amazon CloudFront	Content delivery network (CDN)

Software

Software consists of the programs and software that support Xcelerator as a Service Enterprise Core (operating systems [OSs], middleware, and utilities). The list of software and ancillary software used to build, support, secure, maintain, and monitor Xcelerator as a Service Enterprise Core include the following applications, as shown in the table below:

Software	
Production Application	Business Function
GitHub, Bitbucket	Code repository
Amazon CloudWatch, AWS CloudTrail, Amazon GuardDuty, Datadog, Splunk, PagerDuty	Logging and monitoring
Polarion, Atlassian Jira, Jenkins, GitLab Runner, Argo CD	Continuous integration/continuous delivery (CI/CD)
SonarQube, Aqua, Amazon Inspector	Software testing, component vulnerability scanning
Harbor, JFrog Artifactory, Gitlab	Software repository
Rancher, Ansible, AWS CloudFormation, Grafana	Infrastructure orchestration and automation
Trend Micro, Malwarebytes, Microsoft Defender	Anti-virus/antimalware
Pulse Secure, Zscaler	Corporate virtual private network (VPN)
Microsoft 365	Productivity
Atlassian Confluence, Atlassian Wiki, WalkMe	Document storage, productivity
Apptio Cloudability	Cost control, capacity management

People

The Company develops, manages, and secures Xcelerator as a Service Enterprise Core via separate departments. The responsibilities of these departments are defined in the following table:

People	
Group/Role Name	Function
Executive Management	Responsible for overseeing Company-wide activities, establishing and accomplishing goals, and managing objectives.
Human Resources (HR)	Responsible for onboarding new personnel, defining the roles and positions of new hires, performing background checks, and facilitating the employee termination process.

People	
Group/Role Name	Function
Cloud Security Operations (CSO)	Responsible for managing operations and for the security of the production cloud environments.
Xcelerator Continuous Integration and Continuous Delivery (XCICD)	Responsible for the development environment for Xcelerator as a Service Enterprise Core.
Webkey	Responsible for managing user authentication.
Foundational Services (FDS) Core	Responsible for providing development platforms for customer development and the deployment of applications.
Tech Touch	Responsible for delivering adoption metrics for consumption by Customer Success managers.
Life Cycle Services (LCS)	Responsible for providing a secure platform for data storage and the exchange of information.
Mainstream/Zel-X	Responsible for developing the front-end interface of Xcelerator as a Service Enterprise Core.
Entitlements	Responsible for providing and managing entitlements to users of Xcelerator as a Service Enterprise Core.
Software-as-a-Service (SaaS) Experience	Responsible for providing a unified access portal and usage information for Xcelerator as a Service Enterprise Core.
Site Reliability Engineering (SRE)	Responsible for providing security and operations monitoring for key infrastructure supporting the general Siemens Xcelerator Platform.
Xcelerator Container Runtime (XCR) Kubernetes-as-a-Service (KaaS)	Responsible for providing secure maintenance of Kubernetes clusters on AWS.
WalkMe	Responsible for maintaining product help pages.
RunOps	Responsible for tier 1 support services.
Siemens Corporate IT	Responsible for corporate IAM services, workstations, and corporate VPN services.

Procedures

Procedures include the automated and manual procedures involved in the operation of Xcelerator as a Service Enterprise Core. Procedures are developed and documented by the respective teams for a variety of processes, including those relating to product management, engineering, technical operations, security, IT, and HR. These procedures are drafted in alignment with the overall information security policies and are updated and approved as necessary for changes in the business, but no less than annually.

The following table details the procedures as they relate to the operation of Xcelerator as a Service Enterprise Core:

Procedures	
Procedure	Description
Logical and Physical Access	How the Company restricts logical and physical access, provides and removes that access, and prevents unauthorized access.
System Operations	How the Company manages the operation of the system and detects and mitigates processing deviations, including logical and physical security deviations.
Change Management	How the Company identifies the need for changes, makes the changes using a controlled change management process, and prevents unauthorized changes from being made.
Risk Management	How the Company identifies, selects, and develops risk mitigation activities arising from potential business disruptions and the use of vendors and business partners.
Vulnerability Management	How the Company identifies, evaluates, and remediates vulnerabilities stemming from the use of hardware and software that are essential for the operation of the system.
Personnel Management	How the Company recruits, develops, and promotes skilled personnel that are essential for the continued operations of the system.

Data

Data refers to transaction streams, files, data stores, tables, and output used or processed by the Company. Through the user interface (UI) and application programming interfaces (API), the customer or end-user defines and controls the data they load into and store in the Xcelerator as a Service Enterprise Core production network. Once stored in the environment, the data is accessed remotely from customer systems via the Internet.

Customer data is managed, processed, and stored in accordance with relevant data protection and other regulations and with specific requirements formally established in client contracts.

The Company has deployed secure methods and protocols for the transmission of confidential or sensitive information over public networks. Encryption is enabled for databases and data stores housing sensitive customer data.

The following table details the types of data contained in the production application for Xcelerator as a Service Enterprise Core:

Data		
Production Application	Description	Data Store
Xcelerator as a Service Enterprise Core	The Company stores user-provided files within its data stores as part of its core services. The Company also keeps track of user activity in relation to the types of services customers and their users use, the configuration of their computers, and performance metrics related to their use of the services.	Amazon S3

Data		
Production Application	Description	Data Store
Log Information	The Company logs information about customers and their users, including Internet Protocol (IP) address. Log files are immutable records of computer events about an OS, application, or user activity, which form an audit trail. These records may be used to assist in detecting security violations, performance problems, and flaws in applications.	Amazon GuardDuty, Amazon CloudWatch, AWS CloudTrail, Datadog, Splunk

User Entity Responsibilities

Management of user entities is responsible for the following, which should not be regarded as a comprehensive list of all controls that should be employed by user entities.

- User entities should have policies and procedures to report any material changes to their overall control environment that may adversely affect services being performed by the Company according to contractually specified time frames.
- Controls to provide reasonable assurance that the Company is notified of changes in:
 - User entity vendor security requirements
 - The authorized users list
- It is the responsibility of the user entity to have policies and procedures to:
 - Inform their employees and users that their information or data is being used and stored by the Company.
 - Determine how to file inquiries, complaints, and disputes to be passed on to the Company.
- User entities should only grant access to the Company’s system to authorized and trained personnel.
- Controls to provide reasonable assurance that policies and procedures are deployed over user IDs and passwords that are used to access services provided by the Company.
- User entities should deploy physical security and environmental controls for all devices and access points residing at their operational facilities, including remote employees or at-home agents for which the user entity allows connectivity.

Subservice Organization and Complementary Subservice Organization Controls (CSOCs)

The Company uses AWS as a subservice organization for data center colocation services. The Company’s controls related to Xcelerator as a Service Enterprise Core cover only a portion of the overall internal control for each user entity of Xcelerator as a Service Enterprise Core.

Although the subservice organization has been carved out for the purposes of this report, certain service commitments, system requirements, and applicable criteria are intended to be met by controls at the subservice organization. CSOCs that are expected to be in place at the subservice organization include:

- Physical security controls to protect the data environment from loss of confidentiality, tampering, and availability threats
- Environmental protection to mitigate the risk of fires, power loss, climate, and temperature variabilities
- Backup, recovery, and redundancy controls related to availability
- Security controls to provide the required information security assurances to the Company
- Compliance or governance controls to enforce the requisite security policies and procedures

Company management receives and reviews the ISO/IEC 27001:2013 certification and SOC 2 report from AWS annually where feasible. In addition, through its operational activities, Company management monitors the services performed by AWS to determine whether operations and controls expected to be implemented are functioning effectively. Management also communicates with the subservice organization to monitor compliance with the service agreement, stay informed of changes planned to services, and relay any issues or concerns to AWS management.

It is not feasible for the service commitments, system requirements, and applicable criteria related to Xcelerator as a Service Enterprise Core to be achieved solely by the Company. The CSOCs that are expected to be implemented at AWS are described below.

Criteria	Complementary Subservice Organization Controls
CC6.1	<ul style="list-style-type: none"> • AWS is responsible for encrypting databases in its control.
CC6.4	<ul style="list-style-type: none"> • AWS is responsible for restricting data center access to authorized personnel. • AWS is responsible for the 24/7 monitoring of data centers by closed circuit cameras and security personnel.
CC6.5 CC6.7	<ul style="list-style-type: none"> • AWS is responsible for securely decommissioning and physically destroying production assets in its control.
CC6.6 CC6.8	<ul style="list-style-type: none"> • AWS is responsible for deploying up to date security patches for the SaaS Experience infrastructure.
CC7.2 A1.2	<ul style="list-style-type: none"> • AWS is responsible for the installation of fire suppression and detection and environmental monitoring systems at the data centers. • AWS is responsible for protecting data centers against a disruption in power supply to the processing environment by an uninterruptible power supply (UPS). • AWS is responsible for overseeing the regular maintenance of environmental protections at data centers.

Attachment B

Principal Service Commitments and System Requirements

Principal Service Commitments and System Requirements

Commitments are declarations made by management to customers regarding the performance of Xcelerator as a Service Enterprise Core. Commitments are communicated through the Company’s Universal Customer Agreement (UCA), Cloud Support and Service Level Framework (CSS), and Data Privacy Terms (DPT).

System requirements are specifications regarding how Xcelerator as a Service Enterprise Core should function to meet the Company’s principal commitments to user entities. System requirements are specified in the Company’s policies and procedures.

The Company’s principal service commitments and system requirements related to Xcelerator as a Service Enterprise Core include the following:

Trust Services Category	Service Commitments	System Requirements
<p>Security</p>	<ul style="list-style-type: none"> • The Company will implement appropriate technical safeguards to protect client data that conform to an ISO 27001 information security framework. • The Company will restrict employee access to Xcelerator as a Service Enterprise Core based on job role and business need. • The Company will implement authentication mechanisms to protect Xcelerator as a Service Enterprise Core service and administrative consoles. • The Company will enable timely modification, revocation, and de-provisioning of employee access to Xcelerator as a Service Enterprise Core. • The Company will log and monitor all access and administrative activities within Xcelerator as a Service Enterprise Core. • The Company will implement anti-malware and vulnerability scanning on its information technology (IT) systems. • The Company will establish and maintain logical segregation of production and non-production environments. • The Company will establish and maintain a formal process to control and perform changes to its developed applications. 	<ul style="list-style-type: none"> • Information security standards • Logical access standards • Access review standards • Employee provisioning and deprovisioning standards • Risk and vulnerability management standards • Change management standards • Incident handling and response standards

Trust Services Category	Service Commitments	System Requirements
<p>Availability</p>	<ul style="list-style-type: none"> • The Company will use commercially reasonable efforts to maintain a functional state of Xcelerator as a Service Enterprise Core 24/7, except for planned downtime (weekly 11:59pm EST Saturday to 11:59am EST Sunday) and any unavailability caused by circumstances beyond the Company's reasonable control. • The Company will ensure Xcelerator as a Service Enterprise Core is available for use 95% of the time, monthly, for the Company's standard cloud support deployments. • The Company will use commercially reasonable efforts to notify customers at least 24 hours prior to the occurrence of a scheduled downtime for Xcelerator as a Service Enterprise Core. • In the event of a continuity event, the Company will recover services within 24 hours (recovery time objective [RTO] < 24 hours) and ensure data restoration within 24 hours (recovery point objective [RPO] < 24 hours). 	<ul style="list-style-type: none"> • System logging and monitoring • Backup and recovery standards • Incident handling and response standards • Business continuity standards
<p>Confidentiality</p>	<ul style="list-style-type: none"> • The Company will disclose confidential information only to those employees and third parties that are bound by confidentiality agreements. • The Company will use reasonable care to protect against unauthorized use and disclosure of customer information. • The Company will ensure that customer data transmitted over public networks is encrypted. • The Company will irretrievably erase data or destroy storage media before disposing or reusing IT systems. 	<ul style="list-style-type: none"> • Data classification and handling standards • Encryption standards • Information sharing standards

Attachment C

Other Information Provided by Siemens Industry Software, Inc. That Is Not Covered by the Service Auditor's Report

Other Information Regarding ISO 27001, ISO 27017, ISO 27018

Siemens Industry Software, Inc. meets the requirements of ISO 27001, ISO 27017 and ISO 27018 over the following Scope: The Information Security Management Systems (ISMS) at SISW applies to the preservation of the confidentiality, integrity and availability (CIA) of SISW information assets that enable the management of SISW cloud environments and product offerings, registration No: 31602867 as of 2021-09-09 and valid until 2024-09-08. The scope of the ISO 27001, ISO27017 and ISO 27018 audit includes Siemens' Xcelerator as a Service Enterprise Core. As a result of the successful ISO27001, ISO27017 and ISO 27018 recertification audit in July 2024, the organization has extended the certificate to be valid until 09-2027. There were 3 Opportunities for improvement recommended regarding the maintenance of physical assets as a result of the recertification audit engagement.