

# **Payment Card Industry Data Security Standard**

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## **Attestation of Compliance for Report on Compliance – Service Providers**

**Version 4.0.1**

Publication Date: August 2024

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

**Entity Name: GRUPO CONEKTAME S.A. DE C.V.**

**Date of Report as noted in the Report on Compliance: 12/22/2025**

**Date Assessment Ended: 12/22/2025**

## 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:            | Grupo Conektame SA de CV                                                            |
| DBA (doing business as): | ARQUITECTURA EN INFORMACION TECNOLOGICA SA DE CV                                    |
| Company mailing address: | Boulevard Miguel de Cervantes Saavedra 161, Granada, Miguel Hidalgo, CDMX, CP 11520 |
| Company main website:    | <a href="https://www.conekta.com/">https://www.conekta.com/</a>                     |
| Company contact name:    | Jhon Fredy Triana Marin                                                             |
| Company contact title:   | Security Manager                                                                    |
| Contact phone number:    | +(52) 55 41571416                                                                   |
| Contact e-mail address:  | jhon.triana@conekta.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):                 | Not Applicable                                               |
| Qualified Security Assessor  |                                                              |
| Company name:                | Hacking Mode LLC                                             |
| Company mailing address:     | 600 Cleveland St STE 393 OFF 450, Clearwater, FL 33755       |
| Company website:             | <a href="http://www.hackingmode.com">www.hackingmode.com</a> |
| Lead Assessor name:          | Jessica Avalos                                               |
| Assessor phone number:       | +1 (918) 540-9341                                            |
| Assessor e-mail address:     | jessica.avalos@hackingmode.com                               |
| Assessor certificate number: | QSA 206-520                                                  |

## 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:

Payment Switch (Conekta Payment API)

Type of service(s) assessed:

#### Hosting Provider:

- ☐ Applications / software
- ☐ Hardware
- ☐ Infrastructure / Network
- ☐ Physical space (co-location)
- ☐ Storage
- ☐ Web-hosting services
- ☐ Security services
- ☐ 3-D Secure Hosting Provider
- ☐ Multi-Tenant Service Provider
- ☐ Other Hosting (specify):

#### Managed Services:

- ☐ Systems security services
- ☐ IT support
- ☐ Physical security
- ☐ Terminal Management System
- ☐ Other services (specify):

#### Payment Processing:

- ☐ POI / card present
- ☒ Internet / e-commerce
- ☐ MOTO / Call Center
- ☐ ATM
- ☐ Other processing (specify):

☐ Account Management

☒ Fraud and Chargeback

☒ Payment Gateway/Switch

☒ Back-Office Services

☐ Issuer Processing

☐ Prepaid Services

☐ Billing Management

☐ Loyalty Programs

☐ Records Management

☒ Clearing and Settlement

☒ Merchant Services

☐ Tax/Government Payments

☐ Network Provider

☐ Others (specify):

**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:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Referenced payments in convenience stores                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                                                                                                            |
| Type of service(s) not assessed:                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                            |
| <b>Hosting Provider:</b><br><input type="checkbox"/> Applications / software<br><input type="checkbox"/> Hardware<br><input type="checkbox"/> Infrastructure / Network<br><input type="checkbox"/> Physical space (co-location)<br><input type="checkbox"/> Storage<br><input type="checkbox"/> Web-hosting services<br><input type="checkbox"/> Security services<br><input type="checkbox"/> 3-D Secure Hosting Provider<br><input type="checkbox"/> Multi-Tenant Service Provider<br><input type="checkbox"/> Other Hosting (specify): | <b>Managed Services:</b><br><input type="checkbox"/> Systems security services<br><input type="checkbox"/> IT support<br><input type="checkbox"/> Physical security<br><input type="checkbox"/> Terminal Management System<br><input type="checkbox"/> Other services (specify): | <b>Payment Processing:</b><br><input type="checkbox"/> POI / card present<br><input type="checkbox"/> Internet / e-commerce<br><input type="checkbox"/> MOTO / Call Center<br><input type="checkbox"/> ATM<br><input checked="" type="checkbox"/> Other processing (specify):<br>Referenced payments in convenience stores |
| <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 type="checkbox"/> Merchant Services                                                                                                                                                                                                                                       | <input type="checkbox"/> Tax/Government Payments                                                                                                                                                                                                                                                                           |
| <input type="checkbox"/> Network Provider                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                            |
| <input type="checkbox"/> Others (specify):                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                            |
| Provide a brief explanation why any checked services were not included in the Assessment:                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Not Applicable - Conekta provides a referenced payment service through convenience stores, where funds are deposited into bank accounts. No cardholder or account data is processed, and the supporting infrastructure is completely separate.                                   |                                                                                                                                                                                                                                                                                                                            |

### Part 2b. Description of Role with Payment Cards (ROC Sections 2.1 and 3.1)

|                                                                             |                                                                                                                                                                                                                                       |
|-----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Describe how the business stores, processes, and/or transmits account data. | Conekta processes and transmits e-commerce (card-not-present) transactions as an intermediary payment gateway, providing merchants with connectivity to accept Visa, MasterCard, and American Express credit and debit card payments. |
|-----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

|                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                              | <p>Conekta stores truncated card data (PAN) solely to support clearing and settlement activities, as well as chargeback processes for its affiliated merchants.</p> <p>Additionally, Conekta offers referenced payment services through convenience stores, enabling direct deposits into bank accounts using reference numbers.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data. | <p>Conekta processes e-commerce (card-not-present) transactions as a payment gateway for Visa, MasterCard, and American Express for merchants that have integrated the Conekta API into their websites. These connections are encrypted using TLS 1.2 with ECDHE_RSA, SHA-256, and AES-128-GCM to securely transmit cardholder data over the internet, including PAN, CVC, expiration date, cardholder name, and transaction amount, which are securely collected from merchant web pages.</p> <p>Conekta securely and authentically shares relevant transaction information with its anti-fraud service to validate the legitimacy of the request, including BIN, cardholder name, expiration date, and transaction details. The transaction is then transmitted to payment processors such as Prosa, American Express, and Banorte through a site-to-site VPN connection for authorization or decline.</p> |
| Describe system components that could impact the security of account data.                                                   | <p>Conekta does not operate or maintain networks that impact the processing, transmission, or storage of cardholder data, and its operations are appropriately controlled and monitored.</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.*

Conekta operates infrastructure outside the CDE and maintains connectivity with Prosa, Banorte, and the American Express network to process transactions through site-to-site VPN connections. Transaction processing, as well as clearing, settlement, and refund activities, are conducted over secure HTTPS tunnels using TLS v1.2.

The payment API applications run on Linux servers within the Amazon Web Services (AWS) environment and communicate via HTTPS (TLS v1.2). The DATAVAULT application is used as a service for storing PAN data in tokenized and encrypted databases, including DynamoDB and MongoDB. All infrastructure is hosted on AWS, which is compliant with PCI DSS.

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<br>(How many locations of this type are in scope) | Location(s) of Facility<br>(city, country) |
|---------------------------|-----------------------------------------------------------------------------|--------------------------------------------|
| Amazon Web Services (AWS) | 1                                                                           | N. Virginia, USA (AWS: us-east-1)          |

## 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](http://www.pcisecuritystandards.org))—for example, 3DS Software Development Kits, Approved PTS Devices, Validated Payment Software, Payment Applications (PA-DSS), Point to Point Encryption (P2PE) solutions, Software-Based PIN Entry on COTS (SPoC) solutions, and Contactless Payments on COTS (CPoC) solutions.

## 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:

|                                                                                                                                                                                                                                                                                            |                                                                     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| • 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 checked="" type="checkbox"/> Yes <input type="checkbox"/> No |
| • 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 |
| • Could impact the security of the entity's CDE (for example, vendors providing support via remote access, and/or bespoke software developers).                                                                                                                                            | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No |

#### If Yes:

| Name of Service Provider:                   | Description of Services Provided: |
|---------------------------------------------|-----------------------------------|
| Amazon Web Services (AWS)                   | Hosting Provider                  |
| Promocion y Operacion, S.A. de C.V.(Prosa). | Transaction processing            |
| Crowdstrike                                 | Antivirus Provider                |
| Mongo Database                              | Database Provider                 |

**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: Payment Switch (Conekta Payment API)

| PCI DSS Requirement | Requirement Finding<br>More than one response may be selected for a given requirement.<br>Indicate all responses that apply. |                                     |                          |                          | Select If a<br>Compensating<br>Control(s) Was<br>Used |
|---------------------|------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|--------------------------|--------------------------|-------------------------------------------------------|
|                     | In Place                                                                                                                     | Not Applicable                      | Not Tested               | Not in Place             |                                                       |
| Requirement 1:      | <input checked="" type="checkbox"/>                                                                                          | <input checked="" 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"/>                              |
| Requirement 3:      | <input checked="" type="checkbox"/>                                                                                          | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>                              |
| Requirement 4:      | <input checked="" type="checkbox"/>                                                                                          | <input checked="" 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"/>                              |
| Requirement 6:      | <input checked="" type="checkbox"/>                                                                                          | <input checked="" 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"/>                              |
| Requirement 8:      | <input checked="" type="checkbox"/>                                                                                          | <input checked="" 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"/>                              |
| Requirement 10:     | <input checked="" type="checkbox"/>                                                                                          | <input checked="" 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"/>                              |
| Requirement 12:     | <input checked="" type="checkbox"/>                                                                                          | <input checked="" 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"/>                              |
| Appendix A2:        | <input type="checkbox"/>                                                                                                     | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/>                              |
| Appendix A3:        | <input type="checkbox"/>                                                                                                     | <input checked="" 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 - CONEKTA does not permit the use of insecure protocols, services, or ports.
- 1.3.3 - There are no wireless networks in the AWS environment
- 2.2.5 - CONEKTA does not permit the use of insecure protocols, services, or ports
- 2.3.1 - There are no wireless networks in the AWS environment.
- 2.3.2 - There are no wireless networks in the AWS environment
- 3.3.2 - SAD is not stored or written on disk.
- 3.3.3 - CONEKTA is not an issuer, nor do they support issuing services.
- 3.4.1 - Full PAN is never returned or visible to personnel, as it is encrypted with AWS keys; only a transaction token is accessible via the tokenize API.
- 3.4.2 - Full PAN is never returned or visible to personnel, as it is encrypted with AWS keys; only a transaction token is accessible via the tokenize API.
- 3.5.1.c - Hashed and truncated versions of the same PAN are not present in the environment.
- 3.5.1.1 - Hashing is not used to render PAN unreadable.
- 3.5.1.2 - Disk-level or partition-level encryption are not used in the environment.
- 3.5.1.3 - Disk-level or partition-level encryption are not used in the environment.
- 3.6.1.3 - Clear-text cryptographic key components and management operations are not used.
- 3.7.2 - CONEKTA does not distribute keys. All keys are contained within the AWS environment and the CloudHSM.
- 3.7.4 - The AWS KMS process does not rotate data encryption keys.
- 3.7.6 - Manual clear-text cryptographic key-management operations are not used.
- 3.7.9 - CONEKTA does not share cryptographic keys with customers.
- 4.2.1.2 - There are no wireless networks in the AWS environment.
- 4.2.2 - PANs are not sent via end-user messaging technologies.
- 5.2.3.1 - There is no system components in scope that do not have anti malware solution.
- 5.3.2.1 - CONEKTA does not use periodic scans
- 5.3.3 - CONEKTA does not use removable media in scope
- 6.4.1 - This requirement has been superseded by requirement 6.4.2. and is in place

|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <p>6.5.2 - CONEKTA has not experienced a significant change during the assessment cycle.</p> <p>8.2.3 - CONEKTA does not access customer systems or applications.</p> <p>8.2.7 - CONEKTA does not allow third-party remote access.</p> <p>8.3.4 - The assessor confirmed that AWS IAM does not support account lockout policies, so CONEKTA relies on strong passwords and MFA for security.</p> <p>8.3.10 - CONEKTA does not provision accounts or access for customer users.</p> <p>8.3.11 - CONEKTA does not use smart cards, security tokens, or certificates for user authentication</p> <p>8.4.2 - there is no non-console access in scope</p> <p>8.6.1 - There is not accounts used for interactive log in.</p> <p>8.6.2 - There is not accounts used for interactive log in.</p> <p>8.6.3 - All passwords are managed in HSM.</p> <p>9.4.1, through 9.4.7 - There are no hard-copy or electronic media in scope.</p> <p>9.5.1, through 9.5.1.3- CONEKTA has no card-present payment channels.</p> <p>10.4.2 - All Components are covered in requirement 10.4.1.</p> <p>10.7.1 - This requirement had been superseded by requirement 10.7.2. and is In place</p> <p>11.3.1.3 - No significant changes occurred in the assessment period.</p> <p>11.3.2.1 - CONEKTA has not experienced a significant change during the assessment cycle</p> <p>11.4.4 - The QSA confirmed penetration testing covered all payment components and APIs, with no exploitable vulnerabilities found.</p> <p>11.4.6 - CONEKTA does not use segmentation to isolate the CDE.</p> <p>11.4.7 - CONEKTA is not a multi-tenant Service Provider.</p> <p>12.3.2 - There are no requirements being met using a Customized Approach.</p> <p>12.5.3 - there was no significant changes during the assessment period.</p> <p>12.9.2 - The assessor confirmed that CONEKTA services do not involve customer-responsible processes or requirements.</p> <p>Appendix A1 - CONEKTA is not a multi-tenant Service Provider.</p> <p>Appendix A2 - CONEKTA does not use SSL and/or early TLS.</p> |
|--|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## Part 2. Executive Summary *(continued)*

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

Not Applicable

## Section 2 Report on Compliance

### (ROC Sections 1.2 and 1.3)

|                                                                                                                             |                                                                     |
|-----------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------|
| Date Assessment began:<br><b>Note:</b> <i>This is the first date that evidence was gathered, or observations were made.</i> | 2025-11-13                                                          |
| Date Assessment ended:<br><b>Note:</b> <i>This is the last date that evidence was gathered, or observations were made.</i>  | 2025-12-22                                                          |
| 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 2025/12/22)*.

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><b>Compliant:</b> All sections of the PCI DSS ROC are complete, and all assessed requirements are marked as being either In Place or Not Applicable, resulting in an overall <b>COMPLIANT</b> rating; thereby <i>(Grupo Conektame SA de CV)</i> has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                      |                                                                     |  |  |  |  |  |  |
|-------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------|---------------------------------------------------------------------|--|--|--|--|--|--|
| <input type="checkbox"/>            | <p><b>Non-Compliant:</b> 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 <b>NON-COMPLIANT</b> rating; thereby <i>(Merchant Company Name)</i> has not demonstrated compliance with PCI DSS requirements.</p> <p><b>Target Date</b> 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><b>Compliant but with Legal exception:</b> 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 In Place or Not Applicable, resulting in an overall <b>COMPLIANT BUT WITH LEGAL EXCEPTION</b> rating; thereby <i>(Merchant Company Name)</i> 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"> <thead> <tr> <th>Affected Requirement</th> <th>Details of how legal constraint prevents requirement from being met</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> <tr> <td> </td> <td> </td> </tr> </tbody> </table> | Affected Requirement | Details of how legal constraint prevents requirement from being met |  |  |  |  |  |  |
| Affected Requirement                | Details of how legal constraint prevents requirement from being met                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |                      |                                                                     |  |  |  |  |  |  |
|                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                      |                                                                     |  |  |  |  |  |  |
|                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                      |                                                                     |  |  |  |  |  |  |
|                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                      |                                                                     |  |  |  |  |  |  |

### Part 3. PCI DSS Validation *(continued)*

#### 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

*Jhon Triana*

|                                                                  |                                   |
|------------------------------------------------------------------|-----------------------------------|
| Signature of Service Provider Executive Officer ↑                | Date: 2025-12-22                  |
| Service Provider Executive Officer Name: Jhon Fredy Triana Marin | Title: Oficial de seguridad / P&O |

#### 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:

*Jessica Avalos*

|                               |                  |
|-------------------------------|------------------|
| Signature of Lead QSA ↑       | Date: 2025-12-22 |
| Lead QSA Name: Jessica Avalos |                  |

*Victor Torano*

|                                                       |                               |
|-------------------------------------------------------|-------------------------------|
| Signature of Duly Authorized Officer of QSA Company ↑ | Date: 2025-12-22              |
| Duly Authorized Officer Name: Victor Torano           | QSA Company: Hacking Mode LLC |

#### 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<br>(Select One) |                          | Remediation Date and Actions<br>(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/](https://www.pcisecuritystandards.org/about_us/)*

# Digital

## Certificado de finalización

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Remitente **Iniciador**

Hacking Mode, LLC

Fecha de la firma 16.01.2026 18:37:02 (UTC -05:00)

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*Victor Torano*



Destinatario

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Firma

*Jhon Triana*



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