Payment Card Industry

Data Security Standard

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: Kudi Systems Limited

Date of Report as noted in the Report on Compliance: 24th October 2025

Date Assessment Ended: 13th October 2025

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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:	Kudi Systems Limited
DBA (doing business as):	Kudi Systems
Company mailing address:	C/146/3 Esseefo Road, Asylum Down, Accra
Company main website:	kudisystems.com
Company contact name:	Michael Ekow Selby
Company contact title:	Head IT and Engineering
Contact phone number:	+233 59 701 8036
Contact e-mail address:	ms@kudisystems.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:	Digital Jewels Africa Limited
Company mailing address:	14F, Obi Achebe Drive, Edgewaters Estate, Lekki Phase 1, by Elf Bus-stop Lagos.
Company website:	www.digitaljewels.net
Lead Assessor name:	Oshunkeye Kayode
Assessor phone number:	+2348028712248
Assessor e-mail address:	kayodeo@digitaljewels.net
Assessor certificate number:	206-622

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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 Gateway Services	
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.*

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Part 2. Executive Summary *(continued)*

Part 2a. Scope Verification *(continued)*

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

Name of service(s) not assessed:	Not Applicable

Type of service(s) not assessed:

Hosting Provider:	**Managed Services:**	**Payment Processing:**
☐ Applications / software	☐ Systems security services	☐ POI / card present
☐ Hardware	☐ IT support	☐ Internet / e-commerce
☐ Infrastructure / Network	☐ Physical security	☐ MOTO / Call Center
☐ Physical space (co-location)	☐ Terminal Management System	☐ ATM
☐ Storage	☐ Other services (specify):	☐ Other processing (specify):
☐ Web-hosting services	Not Applicable	Not Applicable
☐ Security services		
☐ 3-D Secure Hosting Provider		
☐ Multi-Tenant Service Provider		
☐ Other Hosting (specify):		
Not Applicable		
☐ 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): Not Applicable

Provide a brief explanation why any checked services were not included in the Assessment:	Not Applicable

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

Describe how the business stores, processes, and/or transmits account data.	Kudi Systems Limited is a Fintech company operating the SPPay digital payments platform, facilitating payments, collections, and disbursements in Ghana
Describe how the business is otherwise involved in or has the ability to impact the security of its customers' account data.	The entity operates the SPPay digital payments platform, which processes and transmits cardholder data to acquirers and payment networks through secure APIs For e-commerce and online transactions, Unified Payment serves as the payment gateway, securely

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	processing cardholder data and routing it to the respective card schemes. 1. End-to-end encryption and tokenization are applied to cardholder data in transit. 2. Cardholder Data Storage and Truncation 3. Digital Ocean temporarily stores cardholder data, including PAN and expiration dates, in PCI DSS-compliant environments. 4. Tokenization is used to replace sensitive data with non-sensitive equivalents for ongoing processing needs.
Describe system components that could impact the security of account data.	Technologies: firewalls, WAF, CrowdStrike Processes: segmentation, defense-in-depth, , application security, continuous monitoring, and strict access control. which includes: 1. Switching and Routing Services 2. Card-not-present (online) transactions between Kudi System and card networks. 3. The switching infrastructure ensures secure authorization, clearing, and settlement processes. 4. Card-Not-Present (CNP) Transactions For online transactions, digial ocean serves as the payment gateway, securely processing cardholder data and routing it to the respective card schemes. 1. End-to-end encryption are applied to cardholder data in transit. 2. Cardholder Data Storage truncation 3. Digital Ocean temporarily stores cardholder data, including PAN and expiration dates, in PCI DSS-compliant environments. 4. Truncation is used to replace sensitive data with non-sensitive equivalents for ongoing processing needs.

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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.*	Kudi Systems Limited is a Fintech company operating the SPPay digital payments platform, facilitating payments, collections, and disbursements in Ghana Kudi Systems supporting these functions is controlled through passwords and multifactor authentication (MFA), with privileges provisioned according to the user's business function. The CDE perimeter is protected with firewalls, intrusion detection, and monitoring tools to inspect and monitor traffic into and out of the environment. System components are regularly updated and patched, and audit logs are retained and actively monitored to support security operations and compliance oversight.
Indicate whether the environment includes segmentation to reduce the scope of the Assessment. (Refer to the "Segmentation" section of PCI DSS for guidance on segmentation)	☒ Yes ☐ No

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

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

Facility Type	Total Number of Locations (How many locations of this type are in scope)	Location(s) of Facility (city, country)
Example: Data centers	*3*	*Boston, MA, USA*
Head Office	1	Esseefo , Asylum Down, Accra
DIgital Ocean	1	Frankfurt, Germanye

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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	YYYY-MM-DD
				YYYY-MM-DD
				YYYY-MM-DD
				YYYY-MM-DD
				YYYY-MM-DD
				YYYY-MM-DD

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

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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))	☒ Yes ☐ 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)	☒ Yes ☐ No
• Could impact the security of the entity's CDE (for example, vendors providing support via remote access, and/or bespoke software developers).	☒ Yes ☐ No

If Yes:

Name of Service Provider:	Description of Services Provided:
Cloudflare	Provides Zero Trust, WAF, and DDoS protection for ingress/egress traffic; enforces segmentation and access security.
DigitalOcean	Provides cloud infrastructure (compute, storage, networking) hosting the backend and CDE components
Google Cloud Storage	Provides cloud infrastructure for hosting supplementary data backup.

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

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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 Gateway Services

PCI DSS Requirement	Requirement Finding More than one response may be selected for a given requirement. Indicate all responses that apply.				Select If a Compensating Control(s) Was Used
	In Place	Not Applicable	Not Tested	Not in Place	
Requirement 1:	☒	☐	☐	☐	☐
Requirement 2:	☒	☐	☐	☐	☐
Requirement 3:	☒	☐	☐	☐	☐
Requirement 4:	☒	☐	☐	☐	☐
Requirement 5:	☒	☐	☐	☐	☐
Requirement 6:	☒	☐	☐	☐	☐
Requirement 7:	☒	☐	☐	☐	☐
Requirement 8:	☒	☐	☐	☐	☐
Requirement 9:	☐	☒	☐	☐	☐
Requirement 10:	☒	☐	☐	☐	☐
Requirement 11:	☒	☐	☐	☐	☐
Requirement 12:	☒	☐	☐	☐	☐
Appendix A1:	☐	☒	☐	☐	☐
Appendix A2:	☐	☒	☐	☐	☐
Justification for Approach					

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For any Not Applicable responses, identify which sub-requirements were not applicable and the reason.	1.3.3 Wireless not connected to the CDE 2.2.5 No Insecure service observed to be in use 2.3.1 Wireless not connected to the CDE 2.3.2 Wireless not connected to the CDE 3.3.1 SAD not stored 3.3.1.1 Full track data not stored 3.3.1.2 CVV not stored 3.3.2 SAD not stored pre-authorization 3,5.1.2 Disk level partition not in use in the organization. 3.6.1.2 HSM not in use in the organization 3.5.1.3 Disk level encryption is not in use. 3.7.9 Keys are not shared with customers 4.1 -4.2.2 Group office helps with the transmission of cardholder data over open public network. 5.2.3, 5.2.3.1 crowdstrike is installed on all systems. 7.2.4 Privilleged access is managed by the group office 4.2.1.2 Wireless not connected to the CDE 4.2.2 PAN is not transmitted over end-user messaging technologies. 6.4.1 Superseded requirement 6.5.4 The organization has not gone into production yet.. 6.5.5 The organization has not gone into production yet 6.5.2 No significant changes observed. 8.2.3 Kudi Systems does not access to customers premises.. 8.2.7 There are no third party account at Kudi Systems used for remote access 8.3.9 Passwords isn't the only authentication used at Kudi Systems. 8.3.11 physical or logical security tokens, smart cards are not used as security token at Kudi Systems. 8.6, 8.6.2, 8.6.3 There are no systems used for interactive logins at Kudi Systems. 9.1 - 9.5 Kudi systems resides in the cloud 11.3.1.3 No significant changes observed 11.3.2.1 No significant changes observed 11.4.7 Not a multi-tenant service provider 12.3.2 Customized approach not used. 12.4.2 - 12.4.2.1 The organization has not gone into production yet, so no review has been conducted in the organization 12.5.3 No significant changes observed
For any Not Tested responses, identify which sub-requirements were not tested and the reason.	Not Applicable

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Section 2 Report on Compliance

(**ROC Sections 1.2 and 1.3**)

Date Assessment began: ***Note:*** *This is the first date that evidence was gathered, or observations were made.*	2025-10-09
Date Assessment ended: ***Note:*** *This is the last date that evidence was gathered, or observations were made.*	2025-10-13
Were any requirements in the ROC unable to be met due to a legal constraint?	☐ Yes ☒ No
Were any testing activities performed remotely?	☒ Yes ☐ No

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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 2025-10-24)*.

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)**:***

☒	**Compliant:** 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 **COMPLIANT** rating; thereby Kudi Systems Limited has demonstrated compliance with all PCI DSS requirements except those noted as Not Tested above.
☐	**Non-Compliant:** Not all sections of the PCI DSS ROC are complete, or one or more requirements are marked as Not in Place, resulting in an overall **NON-COMPLIANT** rating; thereby *(Service Provider Company Name)* has not demonstrated compliance with PCI DSS requirements. **Target Date** for Compliance: *YYYY-MM-DD* 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.
☐	**Compliant but with Legal exception:** One or more assessed requirements in the ROC are marked as Not in Place due to a legal restriction that prevents the requirement from being met and all other assessed requirements are marked as being either In Place or Not Applicable, resulting in an overall **COMPLIANT BUT WITH LEGAL EXCEPTION** rating; thereby *(Service Provider Company Name)* 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. This option requires additional review from the entity to which this AOC will be submitted. *If selected, complete the following:*

Affected Requirement	Details of how legal constraint prevents requirement from being met

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Part 3. PCI DSS Validation *(continued)*

Part 3a. Service Provider Acknowledgement

Signatory(s) confirms:
(Select all that apply)

☒	The ROC was completed according to *PCI DSS*, Version 4.0.1 and was completed according to the instructions therein.
☒	All information within the above-referenced ROC and in this attestation fairly represents the results of the Assessment in all material respects.
☒	PCI DSS controls will be maintained at all times, as applicable to the entity's environment.

Part 3b. Service Provider Attestation

Michael Ekow Selby

Signature of Service Provider Executive Officer ↗	Date: 2025-10-24
Service Provider Executive Officer Name: Michael Ekow Selby	Title: Head, IT Engineering

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: Not Applicable

Signature of Lead QSA ↗	Date: 2025-10-24
Lead QSA Name: Oshunkeye Kayode	

Signature of Duly Authorized Officer of QSA Company ↗	Date: 2025-10-24
Duly Authorized Officer Name: Tokunbo Taiwo	QSA Company: Digital Jewels Africa Limited

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: Not Applicable

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Part 4. Action Plan for Non-Compliant Requirements

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

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

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

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/

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