

**CROSS-BORDER PRIVACY RULES SYSTEM AND PRIVACY RECOGNITION FOR
PROCESSORS SYSTEM JOINT OVERSIGHT PANEL**

**RECOMMENDATION REPORT ON APEC RECOGNITION OF VERASAFE AS AN
ACCOUNTABILITY AGENT FOR THE CBPR AND PRP SYSTEMS**

Submitted To: Ichwan Nasution

Chair, Digital Economy Steering Group

July 8, 2025

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EXECUTIVE SUMMARY

In July 2012, the United States formally commenced participation in the Asia-Pacific Economic Cooperation (APEC) Cross-Border Privacy Rules (herein CBPR) System. Pursuant to Paragraph 5 of the *Protocols of the Joint Oversight Panel*, the United States was then eligible to accept applications for recognition by one or more Accountability Agents operating within its jurisdiction. At that time, the U.S. Department of Commerce invited those organizations interested in serving as an Accountability Agent in the United States to notify the Department of their intent to seek APEC recognition and submit a completed application for initial review to the Department of Commerce. In 2017, the United States formally commenced participation in the APEC Privacy Recognition for Processors (PRP) System. Pursuant to Paragraph 5 of the *Protocols of the PRP Joint Oversight Panel*, the United States was then eligible to nominate one or more Accountability Agents for APEC recognition.

On June 24, 2025, the United States Department of Commerce received an application from VeraSafe to be recognized as an Accountability Agent in the United States for the CBPR and the PRP Systems. After having reviewed the completeness of this application, the United States Department of Commerce forwarded this submission to the Joint Oversight Panel (JOP). The JOP found that VeraSafe meets the requirements to serve as an Accountability Agent in the United States. VeraSafe's recognition as an Accountability Agent will be valid for an initial one year from the date of endorsement.

SCOPE OF CONSULTATION PROCESS

Pursuant to Paragraph 7.2 of the *Charter of the Joint Oversight Panel*, members of the JOP began a consultative process to:

- Confirm the enforceability of an organization's CBPR and/or PRP obligations once certified as CBPR and/or PRP compliant by VeraSafe;
- Confirm VeraSafe's location and the relevant Enforcement Authority;
- Confirm that VeraSafe meets the recognition criteria as identified in the *Accountability Agent Applications for APEC Recognition for the CBPR and PRP Systems* and that it has provided necessary documentation as requested by JOP;
- Confirm VeraSafe makes use of program requirements that meet the baseline established in the CBPR and PRP Systems; and
- Confirm VeraSafe has provided the necessary signature and contact information.

The following Recommendation Report was drafted by the JOP pursuant to the

requirements set out in paragraph 16 of the JOP Protocols.

RECOMMENDATION OF THE JOINT OVERSIGHT PANEL

Having verified the United States is a participant in the APEC Cross Border Privacy Rules (CBPR) and Privacy Recognition for Processors (PRP) Systems and has demonstrated the enforceability of the CBPR and PRP program requirements pursuant to the information provided in Annex B of the United States Notice of Intent to Participate in the CBPR and PRP Systems;

Having verified VeraSafe is in the United States and is subject to the enforcement authority described in Annex A of the United States Notice of Intent to Participate in the CBPR and PRP Systems;

Having verified with the Administrators of the APEC Cross Border Privacy Enforcement Arrangement (CPEA) that the United States Federal Trade Commission, a Privacy Enforcement Authority in the United States, is a participant in the APEC CPEA;

Having determined, in the opinion of the members of the Joint Oversight Panel, that VeraSafe has policies in place that meet the established recognition criteria and makes use of program requirements that meet those established in the CBPR and PRP Systems, and;

Having verified VeraSafe has provided the required signature and contact information;

The JOP recommends APEC member economies consider the conditions established in 7.2 (ii) of the Charter of the Joint Oversight Panel to have been met by VeraSafe and to grant VeraSafe's request for APEC recognition to certify organizations within the United States and under the jurisdiction of the United States Federal Trade Commission as compliant with the CBPR and PRP Systems pursuant to the established guidelines governing the operation of the CBPR and PRP Systems.

Submitted by the Joint Oversight Panel:

Shannon Coe
Chair, Joint Oversight Panel
Department of Commerce, United States of America

Evelyn Goh
Member, Joint Oversight Panel
Infocomm Media Development Authority, Singapore

Yuji Ikai
Member, Joint Oversight Panel
Ministry of Economy, Trade and Industry, Japan

REQUEST FOR CONSENSUS DETERMINATION

APEC member economies are asked to make a determination as to VeraSafe's request for recognition, taking into account the JOP's recommendation. Any APEC member economy has the right to reject the request of an applicant Accountability Agent for recognition for failure to meet any of the recognition criteria required in the *Accountability Agent Applications for APEC Recognition for the CBPR and PRP Systems*. When making this determination, any APEC member economy may request additional information or clarification from VeraSafe or the JOP. If no objection is received within the deadline for consensus determination as established by the Digital Economy Steering Group (DESG) Chair, the request will be considered to be approved by the DESG. Should member economies determine that VeraSafe has met the necessary criteria, APEC recognition will be for one year from the date of recognition, one month prior to which, VeraSafe may re-apply for APEC recognition if it so wishes, following the same process described herein.

I. ENFORCEABILITY

Is the Applicant subject to the jurisdiction of the relevant enforcement authority in a CBPR and PRP participating economy?

Recommendation

The JOP is satisfied that VeraSafe is subject to the jurisdiction of the United States Federal Trade Commission (FTC), a participant in the Cross-Border Privacy Enforcement Arrangement (CPEA).

Discussion

In its *Notice of Intent to Participate in the CBPR and PRP Systems*, the United States described its enforcement authority as follows¹:

To become a recognized APEC Accountability Agent, an applicant must complete and sign the Accountability Agent APEC Recognition Application...By publicly posting its Recognition Application, a recognized APEC Accountability Agent further represents that the answers contained in the document are true.

In addition, any organization that publicly displays a seal, trustmark or other symbol indicating its participation in the CBPR and PRP Systems or causes its name to appear on a list of recognized APEC Accountability Agents, is making an enforceable representation that it complies with the requirements applicable to a recognized APEC Accountability Agent.

If an APEC-recognized Accountability Agent subject to the jurisdiction of the Federal Trade Commission (FTC) fails to comply with any of these requirements, its representations of compliance may constitute unfair or deceptive acts or practices in violation of Section 5 of the FTC Act, 15 U.S.C. § 45. The FTC has broad authority to take action against unfair and deceptive acts and practices.

Furthermore, if an APEC-recognized Accountability Agent authorizes the use of its certification mark, 15 U.S.C. §1127, to convey compliance with the CBPR and PRP program requirements, under Section 14(5) of the Lanham Act, 15 U.S.C. § 1064(5), the U.S. Patent and Trademark Office may cancel the certification mark if the Accountability Agent (a) does not control, or is not able legitimately to exercise control over, the use of such mark, including by failing to monitor the activities of those who use the mark, (b) engages in the production or marketing of any goods or services to which the certification mark is applied, (c) permits the use of the certification mark for purposes other than to certify, or (d) discriminately refuses to certify or to continue to certify the goods or services of any person who maintains the standards or conditions which such mark certifies.

¹ The text herein has been modified from the Notice of Intents provided by the United States for the CBPR and PRP Systems to reconcile differences between the notices and reflect what the United States generally communicated in both cases.

The JOP has consulted with the FTC and confirmed that VeraSafe, a Delaware for-profit entity², is subject to the regulatory oversight and enforcement authority of the FTC. The JOP has further confirmed that the FTC is a participant in the CPEA and that the United States is a recognized participant in the APEC CBPR and PRP Systems. VeraSafe agrees that should it receive APEC recognition, it will publicly indicate its participation in the CBPR and PRP Systems including allowing its name to appear on a list of recognized APEC Accountability Agents. VeraSafe agrees to post all CBPR and PRP certified companies online as well as the applicable CBPR and PRP program requirements. VeraSafe will only issue its forthcoming CBPR and PRP certification marks to organizations that have demonstrated full compliance with all requirements.

² Registered as “VeraSafe, LLC”, File Number 7598088, at <https://icis.corp.delaware.gov/ecorp/entitysearch/NameSearch.aspx>, accessed on May 7, 2025.

II. RECOGNITION CRITERIA

The *Accountability Agent Applications for APEC Recognition* for the CBPR and PRP Systems requires applicants to describe how each of the fifteen (15) Accountability Agent Recognition Criteria have been met using the Accountability Agent Recognition Criteria Checklist. Following is an overview of each listed requirement and recommendation of the sufficiency of each based on the information submitted to the JOP by VeraSafe.

Conflicts of Interest (Recognition Criteria 1-3)

1. *Applicant Accountability Agent should describe how requirements 1(a) and (b) in Annex A of the Accountability Agent Applications for APEC Recognition for the CBPR and PRP Systems have been met and submit all applicable written policies and documentation.*
2. *Applicant Accountability Agent should submit an overview of the internal structural and procedural safeguards to address any of the potential or actual conflicts of interest identified in 2(b) of Annex A of the Accountability Agent Applications for APEC Recognition for the CBPR and PRP Systems.*
3. *Applicant Accountability Agent should describe the disclosure/withdrawal mechanisms to be used in the event of any actual conflict of interest identified.*

Recommendation

The JOP is satisfied that VeraSafe meets Recognition Criteria 1-3.

Discussion

VeraSafe submitted information about how it is free of actual or potential conflicts of interest and about internal structural and procedural safeguards in place to address potential and actual conflicts of interest.

Employee conduct is addressed in VeraSafe's Team Member Manual (excerpted in VeraSafe's 2025 Accountability Agent Application) and VeraSafe's Conflicts of Interest Policy (Appendix A of VeraSafe's 2025 Accountability Agent Application), which includes internal structural and procedural safeguards to address potential and actual conflicts of interest and to ensure that VeraSafe employees are able to perform all tasks related to the certification and ongoing participation of an applicant or participant organization in the APEC CBPR or PRP programs, free from influences that would compromise their professional judgment, objectivity, and integrity. The Conflicts of Interest Policy prohibits direct or indirect affiliation with any applicant or participant organization that would prejudice VeraSafe's ability to render a fair decision with respect to certification and ongoing participation in the CBPR and PRP Systems. The Conflict of Interest Policy requires VeraSafe to withdraw from certain situations, requires separation of personnel handling privacy certification functions from handling sales and consulting functions, requires internal review for and withdrawal from Conflicts of Interest. The Conflicts of Interest Policy prohibits VeraSafe from performing services for applicant or participating organizations that would compromise its objectivity. Under the Policy, VeraSafe is also required to disclose to the JOP any engagements concerning consulting or

technical services provided to applicant or participant organizations other than services related to their certification and on-going participation in the CBPR and/or PRP System(s), any withdrawn engagements, and any cured potential conflicts. The JOP has confirmed that these written policies and procedures satisfy Recognition Criteria 1-3.

The JOP has confirmed that VeraSafe is required to apply its certification standards in an impartial manner pursuant to the terms of its forthcoming CBPR and PRP certification marks. The JOP has confirmed that VeraSafe's forthcoming CBPR and PRP certification marks will only be issued to organizations that have demonstrated full compliance with all requirements 15 U.S.C. § 1064 permits the Federal Trade Commission to request that the United States Patent and Trademark Office cancel this service mark on the grounds that the holder of the mark "discriminately refuses to certify or to continue to certify the goods or services of any person who maintains the standards or conditions which such mark certifies."

Program Requirements (Recognition Criterion 4)

Applicant Accountability Agent should indicate whether it intends to use the relevant template documentation developed by APEC or make use of Annex C of the Accountability Agent Application[s] for APEC Recognition for the CBPR and PRP Systems to map its existing intake procedures to CBPR and PRP program requirements.

Recommendation

The JOP is satisfied that Verasafe meets Recognition Criterion 4.

Discussion

VeraSafe has committed to using the APEC-endorsed CBPR and PRP Program Requirements found in Annex C of the Accountability Agent Applications for the CBPR and PRP Systems if recognized as an Accountability Agent.

Certification Process (Recognition Criterion 5)

Applicant Accountability Agent should submit a description of how the requirements as identified in 5 (a) – (d) of Annex A of the Accountability Agent Applications for APEC Recognition for the CBPR and PRP Systems have been met.

Recommendation

The JOP is satisfied that VeraSafe meets Recognition Criterion 5.

Discussion

VeraSafe submitted information describing the comprehensive certification review process, it will deploy upon recognition as an Accountability Agent. VeraSafe will use the APEC-approved CBPR

and PRP Intake Questionnaires and associated Program Requirements to conduct an initial assessment of compliance for all applicant organizations.

Upon an applicant organization's completion of the intake forms, VeraSafe will verify the contents of the self-assessment form and will document the organization's compliance with each of the associated Program Requirements and provide a comprehensive report to the organization outlining its findings. If noncompliance with any Program Requirement is found, VeraSafe will communicate the required changes to the applicant organization for the applicant organization to obtain CBPR and/or PRP certification, as applicable, and review any corresponding changes to the applicant organization's policies and procedures. VeraSafe will then verify whether such changes have been properly completed by the applicant organization.

If VeraSafe determines that the applicant organization meets the Program Requirements for certification under the CBPR or PRP programs, as applicable, the applicant organization will be awarded a certification mark identifying their participation in the applicable program(s), to be displayed on the privacy notices within the scope of the certification. When a consumer clicks on this certification mark the consumer will be brought to a confirmation page that states (i) whether the organization is in good standing in the program, (ii) the scope of the organization's participation, and (iii) instructions on how to file a complaint concerning the organization using VeraSafe's Dispute Resolution Procedure (Appendix B of VeraSafe's 2025 Accountability Agent Application). VeraSafe will then provide the relevant details of the participant's certification for the CBPR and/or PRP Compliance Directories to APEC through the established channels for the Systems.

On-going Monitoring and Compliance Review Processes (Recognition Criteria 6, 7)

Applicant Accountability Agent should submit a description of the written procedures to ensure the integrity of the certification process and to monitor the participant's compliance with the program requirements described in 5 (a)-(d) of Annex A in the Accountability Agent Applications for APEC Recognition for the CBPR and PRP Systems.

Applicant Accountability Agent should describe the review process to be used in the event of a suspected breach of the program requirements described in 5(a)-(d) of Annex A in the Accountability Agent Applications for APEC Recognition for the CBPR and PRP Systems.

Recommendation

The JOP is satisfied that Verasafe meets Recognition Criteria 6, 7.

Discussion

VeraSafe submitted comprehensive written documentation of its internal procedures designed to ensure integrity of its certification process and to monitor compliance of certified organizations throughout the certification period. As VeraSafe explains in the application documents, it has established monitoring and compliance review mechanisms, which include the following:

- 1) **Self-reporting.** All participants will be contractually required to notify VeraSafe of any changes to the policies and practices within the scope of the CBPR and/or PRP

programs prior to the implementation of such changes for review against the relevant program requirements.

- 2) **Website Change Monitoring.** All reviewed and approved privacy notices within the scope of a CBPR or PRP certification will be monitored to detect and track changes.
- 3) **Third-party Reporting.** VeraSafe will investigate complaints against Participants that it receives through its Dispute Resolution Procedure.

If, through any of these methods, VeraSafe discovers reasonable grounds to believe that a Participant has engaged in a practice that may constitute a breach of the relevant program requirements, an immediate review process will be conducted. This review process will begin with an initial assessment within five days of identifying the potential issue and additional steps that will take place over the course of 35 business days.

The scope of a review of a participant will depend on specific circumstances surrounding the potential breach of the program requirement(s). If, through this review, VeraSafe identifies an actual breach of one or more program requirements, the participant will be sent a warning letter, which may be delivered via email, including a reasonable timeframe within which the corrections must be completed. This reasonable cure period generally lasts 20 business days but may be extended for up to six months in more complex cases. If the Participant fails to correct the identified non-compliance within this period, they will be suspended from the program. During such suspension, the use of the certification mark will be revoked and the applicable Compliance Directories will be updated to reflect that the participant is no longer active in the program.

Re-Certification and Annual Attestation (Recognition Criterion 8)

Applicant Accountability Agent should describe their re-certification and review process as identified in 8 (a)-(d) of Annex A in the Accountability Agent Applications for APEC Recognition for the CBPR and PRP Systems.

Recommendation

The JOP is satisfied that VeraSafe meets Recognition Criterion 8.

Discussion

The JOP has confirmed that a Participant must complete VeraSafe's re-certification process within 12 months of the Participant's previous certification date to maintain good standing in the CBPR and/or PRP Systems. The re-certification process follows the certification process described in response to Recognition Criterion 5, thereby providing a comprehensive review to ensure the integrity of the re-certification process. In addition, if the Participant notifies VeraSafe of a change to their data processing and management practices, the change will be evaluated by VeraSafe to ensure that full compliance with the relevant program is maintained. If during the annual re-certification cycle, VeraSafe discovers any previously unreported non-compliance, the non-compliant practice will be treated as a breach of the program requirements,

triggering the reasonable cure period. Failure to cure within that time will likewise result in a suspension.

Dispute Resolution Process and Complaint Processing (Recognition Criteria 9, 10)

Applicant Accountability Agent should describe the mechanism to receive and investigate complaints and describe the mechanism for cooperation with other APEC recognized Accountability Agents that may be used when appropriate.

Applicant Accountability Agent should describe how the dispute resolution process meets the requirements identified in 10 (a) – (h) of Annex A in the Accountability Agent Applications for APEC Recognition for the CBPR and that complaint processing meets the requirements identified in 10 (a) – (d) of Annex A in the Accountability Agent Applications for PRP Systems, whether supplied directly by itself or by a third party under contract (and identify the third party supplier of such services if applicable and how it meets the conflict of interest requirements identified in sections 1-3 of Annex A) as well as its process to submit the required information in Annexes D and E of the Accountability Agent APEC Recognition Applications for the CBPR and PRP Systems.

Recommendation

The JOP is satisfied that VeraSafe meets Recognition Criteria 9, 10

Discussion

The JOP has confirmed that VeraSafe has an existing, in-house customer dispute resolution program to receive, investigate and process complaints about participants that is accessible through the VeraSafe website. VeraSafe also has a mechanism to process complaints and resolve disputes between complainants and participants in relation to non-compliance with its program requirements. VeraSafe also has a mechanism for cooperation on dispute resolution and complaint processing with other Accountability Agents recognized by APEC economies. VeraSafe's dispute resolution process and complaint processing mechanism will be administered directly by VeraSafe, LLC and is described in full in the VeraSafe CBPR and PRP Systems Dispute Resolution Procedure (Appendix B of VeraSafe's 2025 Accountability Agent Application) (DRP).

The JOP has confirmed that VeraSafe will be able to receive complaints from both individuals and personal information controllers through a secure webform and dedicated email inbox, as outlined in Section 5.3 of the DRP. Upon receipt, each complaint will be evaluated for eligibility per Section 6.2 of the DRP, including whether it falls within the scope of the APEC CBPR or PRP System obligations and whether the respondent is an active Participant in good standing.

Per Sections 5.4 and 6.4 of the DRP, VeraSafe will notify the Complainant of its eligibility determination. Where the complaint is from an individual and concerns the processing of personal information, VeraSafe has established a process under 6.7 of the DRP for (a) forwarding the

complaint to the appropriate entity in a timely manner (b) providing written notice to the complainant and the participant noting when the complaint has been forwarded, and (c) obtaining the individual's consent before sharing the personal information with the relevant enforcement authority.

Per Section 7.1 of the DRP, if the complaint is deemed eligible, VeraSafe will share the complaint with the participant, and then the participant is required to respond within 20 business days. Per Section 7.3, VeraSafe has a process for investigating complaints and may conduct an impartial investigation which includes reviewing submissions, interviewing relevant parties, and requesting clarifications. Per Section 5.5 of the DRP, all complaint handling is confidential and timely with a target resolution period of 90 calendar days from the eligibility determination.

If informal mediation fails, per Section 8 of the DRP, a formal Procedure Hearing may be initiated, resulting in non-binding corrective measures outlined in a Reparation Order.

The JOP has confirmed that VeraSafe will notify both the complainant and the participant of the outcome in writing, whether the complaint is resolved by mediation, settlement, or formal hearing per Sections 8.5 and 10.1. of the DRP. As outlined in VeraSafe's Program Addendum at 3.1(c), should non-compliance be found, VeraSafe will notify the Participant of the corrections that need to be made and provide a reasonable cure period to do so.

VeraSafe has established a mechanism to cooperate with other APEC-recognized Accountability Agents, as detailed in Section 6.6 and Section 11.4 of its DRP. When a complaint implicates entities or participants outside the U.S. or requires interpretation across economies, VeraSafe will coordinate with other recognized Accountability Agents. This includes sharing information as appropriate, determining which agent is best placed to lead the complaint process, and collaborating on outcomes to ensure consistency and fairness. As detailed in Sections 5.2 and 6.7, VeraSafe has processes in place to obtain consent from the complainant and will obtain explicit consent before sharing any personal information with relevant enforcement authorities. VeraSafe will also maintain communication channels to support such cross-border collaboration.

Per Section 12.1 of the DRP, VeraSafe will publish annual reports summarizing the number and types of complaints received, outcomes, resolution timelines, and referrals to authorities, unless none of the foregoing occurred during the relevant period. These reports will be anonymized where appropriate and communicated to the relevant privacy enforcement authority and government agencies. Each Annual Procedure Report will include anonymized case notes on selected resolved complaints to illustrate typical or significant interpretations and outcomes.

Mechanism for Enforcing Program Requirements (Recognition Criteria 11-15)

Applicant Accountability Agent should provide an explanation of its authority to enforce its program requirements against participants.

Applicant Accountability Agent should describe the policies and procedures for notifying a participant of non-compliance with Applicant's program requirements and provide a description of the processes in place to ensure the participant remedy the non-compliance.

Applicant Accountability Agent should describe the policies and procedures to impose any of the penalties identified in 13 (a) – (e) of Annex A in the Accountability Agent Applications for APEC Recognition for the CBPR and PRP Systems.

Applicant Accountability Agent should describe its policies and procedures for referring matters to the appropriate public authority or enforcement agency for review and possible law enforcement action. [NOTE: immediate notification of violations may be appropriate in some instances].

Applicant Accountability Agent should describe its policies and procedures to respond to requests from enforcement entities in APEC Economies where possible.

Recommendation

The JOP is satisfied that VeraSafe meets Recognition Criteria 11-15.

Discussion

The JOP has confirmed that VeraSafe enforces its program requirements through contract, known as the Program Addendum (Appendix C of VeraSafe's 2025 Accountability Agent Application). Specifically, the contract, as explained by VeraSafe's Accountability Agent Application, allows VeraSafe to suspend or terminate an organization's participation in the CBPR or PRP System if the organization fails to cure a non-compliance within a reasonable cure period as determined by VeraSafe. VeraSafe may also publicly disclose the Participant's noncompliance in accordance with program guidelines. The Program Addendum further provides that the Participant must immediately remove the relevant certification mark from display at (i) the end of the Program Term, (ii) the date on which Participant becomes due for its next annual assessment hereunder, and (iii) the date on which Participant loses its certification under the System for any other reason.

VeraSafe has a process in place to immediately notify a participant of non-compliance within 1-2 business days of identifying the issue and suspend participation arising from a complaint filed through the dispute resolution process. The participant must remedy the non-compliance within a reasonable cure period, as determined by VeraSafe, or its participation will be suspended or terminated. Per VeraSafe's Accountability Agent Application, VeraSafe may refer any violations to the FTC or other appropriate government agency and will refer such violations where required by law, regulatory agreements, or program rules. The JOP has confirmed that VeraSafe will respond to requests from enforcement entities in Member Economies that reasonably relate to the Economy and to the CBPR or PRP-related activities of VeraSafe, where possible.

III. CASE NOTES AND STATISTICS

Will the Applicant provide relevant information on case notes and statistics as outlined in Annexes D and E of the Accountability Agent Application for APEC Recognition for the CBPR and PRP Systems?

Recommendation

The JOP is satisfied that VeraSafe meets the Case Notes and Statistics requirements as stipulated in Annexes D and E of the *Accountability Agent Applications for APEC Recognition* for the CBPR and PRP Systems.

Discussion

For the CBPR and PRP Systems, the Accountability Agent Recognition Criterion 10 requires applicants to have a process for making publicly available statistics on the types of complaints and the outcomes of such complaints (*Accountability Agent Applications for APEC Recognition for the CBPR* Annex E and *Accountability Agent Applications for APEC Recognition for the PRP* Annex D). For the CBPR System, the Accountability Agent Recognition Criterion 10(h) requires applicants to have a process for releasing, in anonymized form, case notes on a selection of resolved complaints illustrating typical or significant interpretations and notable outcomes (see Annex D). The JOP has confirmed that VeraSafe will make publicly available information on the number of complaints and outcomes of such complaints and release case notes on a selection of important complaints. The JOP has confirmed that VeraSafe will annually send anonymized case notes pursuant to the requirements of Annex D of the *Accountability Agent Application for APEC recognition for the CBPR System* to APEC Member Economies as a condition of their recognition.

SIGNATURE AND CONTACT INFORMATION

By signing this document, the signing party attests to the truth of the answers given.

Matthew Joseph

07/09/2025

[Signature of person who has authority

[Date]

to commit party to the agreement]

[Typed name]:

Matthew Joseph

[Typed title]:

President

[Typed name of organization]:

VeraSafe, LLC

[Address of organization]:

100 M Street S.E., Suite 600

Washington D.C., 20003, USA

[Email address]:

rsd@verasafe.com

[Telephone number]:

+1-617-398-7067

The first APEC recognition for an Accountability Agent is limited to one year from the date of recognition. APEC recognition is limited to two years from the date of recognition thereafter. One month prior to the anniversary of the date of recognition, the Accountability Agent must resubmit this form and any associated documentation to the appropriate government agency or public authority or as soon as practicable in the event of a material change (e.g. ownership, structure, policies).

NOTE: Failure to comply with any of the requirements outlined in this document may result in appropriate sanctions under applicable domestic law.




VeraSafe - FINAL JOP Recommendation Report_ Verasafe APEC CBPR PRP Accountability Agent (Ready for Signature)

Final Audit Report

2025-07-09

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