CONSEIL DE GOUVERNANCE NUMÉRIQUE

DIGITAL GOVERNANCE COUNCIL

Validation Statement

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Validation Claims

Digital Governance Council has assessed the claims declared by SynergAI ("SynergAI") and reviewed the supporting evidence provided concerning the proposed production environment for its TransPacific Trade Nexus ("TPTN" or "Proposed Solution") in accordance with the policies and procedures of the DGC Digital Trust Verification Program. The claims were assessed in accordance with the following:

- **Assessment Type:** Validation Review
- **Scope:** Data Governance
- **Sub-Scope:** Digital Sovereignty
- **Applicable Standard(s)/Assessment Tool(s):** CAN/DGSI 100-8:2026, Second Edition, *Data Governance – Part 8: Framework for Digital Sovereignty*, Annex B
- **Accreditation Standard(s):** ISO/IEC 17029:2019, *Conformity assessment — General principles and requirements for validation and verification bodies*
- **Assessed Design and Validation Report:** TransPacific Trade Nexus (TPTN) proposed production environment, as documented in TPTN's SovereignReady Validation Evidence Package, Final v1.0, dated 31 August 2026.

The Proposed Solution is intended for future operational deployment in a production environment designed to maintain Canadian control over its governance, data, systems, infrastructure, intellectual property and material third-party dependencies. The intended use is limited to the production environment, deployment configuration and system boundaries identified in the assessed design, subject to the assumptions, dependencies, implementation conditions and operating conditions specified in the validation report.

The objective of the validation was to evaluate the plausibility of SynergAI's claims concerning the Proposed Solution's capability within its intended production environment. Based on the validation activities performed, DGC confirms, as of the date of issuance, the plausibility of the following claims declared by SynergAI concerning the specified intended future use of the Proposed Solution, when implemented and operated in accordance with the assessed design and specified conditions:

1. SynergAI's legal ownership, financial management and operational decision-making authority are Canadian-based and are intended to maintain Canadian control over TPTN's governance and operations.
2. SynergAI's governance and contractual arrangements are designed to ensure that no foreign entity, parent company or affiliate exercises direct or indirect authority to compel access to TPTN data or systems within the proposed production environment, including through obligations under foreign legislation such as the U.S. CLOUD Act. SynergAI will identify, document and report any conflicts arising from foreign entity obligations affecting data access or use.
3. TPTN's production environment is designed to ensure that data processing and storage, encryption key management and privileged access are designed to be controlled by personnel and systems subject to Canadian domestic law. Critical systems and sensitive data are intended to be hosted or controlled within Canada.

4. Where third-party cloud or service providers are used, TPTN's production environment is designed to employ technical and operational controls that prevent unauthorized foreign jurisdictional access, including control over encryption keys, administrative access, and data access pathways.
5. SynergAI has established processes to subject digital third-party relationships material to TPTN's sovereignty boundary, including digital tools, software licensing and copyright access, to scrutiny regarding their adherence to and support for SynergAI's digital sovereignty.
6. SynergAI has evaluated and documented intellectual property ownership and control across the technology stack and value chain material to TPTN, with the intention of maintaining appropriate control over its future operation and development.
7. SynergAI has planned independent verification at defined intervals following TPTN's production implementation to assess whether its production environment continues to meet the applicable criteria of CAN/DGSI 100-8, Annex B.

This validation concerns the plausibility of SynergAI's declared claims within the specified scope and intended future use. The validation does not constitute certification of TPTN, a legal determination of compliance with applicable legislation, verification of actual operational performance, or a guarantee of future performance or compliance. It does not extend to functions, deployment configurations, versions or implementations outside the assessed scope.

DGC Statement of Assurance

DGC assures that the validation and assessment process was conducted impartially, fairly and transparently using evidence provided in accordance with the DGC Digital Trust Verification Program, subject to approved DGC policies and procedures publicly available. This validation statement does not constitute an endorsement by DGC. Until such time that the DGC Digital Trust Verification Program receives accreditation, this validation statement shall be relied on as an interim acknowledgement only. Once accreditation is received, this validation statement shall be reviewed and considered for formal recognition. This is a third-party validation.

Date of Issuance: 2026-11-03

Signature:

Keith Jansa, CEO, Digital Governance Council

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