



SAMPLE EVIDENCE PACK · PRE-BIND ASSESSMENT · OPEN CIRCULATION

Receiver-side *evidence* for underwriting.

Subject – botconduct.org · *sample property*

ENGAGEMENT	OBSERVATION	AUTHORITY	DOCUMENT
Pre-bind	14 days	BotConduct Observatory Desk	INS-SAMPLE-0428-A Cycle 05-2026

FOR THE ATTENTION OF

The instructed broker and the underwriting committee of record, in preparation for a cyber insurance pre-bind or renewal cycle. Findings are signed Ed25519 and admissible without recourse to the Observatory.



§ 0 · DOCUMENT CONTROL

Control sheet & *contents.*

DOCUMENT	INS-SAMPLE-0428-A
CYCLE	05 · 2026
ENGAGEMENT	Pre-bind Assessment
SUBJECT	botconduct.org
OBSERVATION	14 days · 04 – 17 May 2026
AUTHORITY	BotConduct Observatory Desk
STATUS	Open circulation · sample
SIGNING	Ed25519 · <i>verifiable</i>
LENGTH	Nine pages

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This document is signed. The signature is reproducible without recourse to the Observatory.

Verification key: `k1.ed25519.6f2b...c8a7`. Document hash: `sha256:8e3a...f12d`. Both are listed in the Observatory's public verification ledger at botconduct.org/verification/.

An underwriter or counsel may verify the chain of custody on their own infrastructure, using standard Ed25519 tooling, without trusting either the Observatory or the perimeter products in front of the property.

§ 1 · EXECUTIVE SUMMARY

For the *underwriter*. One page.

EXECUTIVE SUMMARY · FOR BROKER & UNDERWRITER

Over a fourteen-day observation window directed at the subject property, the Observatory characterized eight distinct automated actors, three of which warrant note for the purposes of cyber underwriting. The conduct described below is signed, framework-referenced, and admissible.

- № 01 **Declared AI crawlers behaved at cadences inconsistent with their public schedules.** Material to NIST AI RMF (MEASURE 2.7) and OWASP Top 10 Agentic (ASI01). Not a control failure of the property; a description of incoming surface.
- № 02 **A rotating residential-proxy operator conducted persistent reconnaissance against commercial surfaces.** Pattern consistent with cohort-correlated commercial monitoring. Material to EU AI Act Art. 15 and Colorado AI Act SB 24-205 reporting expectations.
- № 03 **An agentic browser framework was characterized traversing methodology and documentation surfaces.** Material to MITRE ATLAS (AML.T0010) and a contributing factor to forward-looking risk that current bot-management telemetry does not record.

- ¶ 1.1 No finding constitutes an enforcement recommendation. The Observatory *discloses what was observed*; the disposition of each finding belongs to the property owner, the broker, and the underwriter.

§ 2 · SUBJECT & SCOPE OF ASSESSMENT

What was *assessed*, and what was *not*.

PROPERTY	botconduct.org · primary marketing & research surface (sample property).
OBSERVATION WINDOW	14 days · 2026-05-04T00:00:00Z to 2026-05-17T23:59:59Z.
POINT OF MEASUREMENT	Receiver-side. Independent, at the property boundary.
SURFACES IN SCOPE	Public marketing, research, methodology, engagements. <i>/api</i> surfaces are <i>not in scope</i> for this engagement (subject property does not expose a public API).
OUT OF SCOPE	Authenticated areas; member-only surfaces; private bulletin circulation; transactional events; payment processing. Cyber surface only.
NOT PROVIDED	<i>Enforcement recommendation.</i> The Observatory characterizes; it does not block, rate-limit, or remediate. Operational disposition belongs to the property owner.
ENGAGEMENT FORM	Pre-bind Assessment · one-off · evidence pack delivered to the broker of record on completion.

- ¶ 2.1 A pre-bind assessment is a discrete forensic engagement, scoped to the underwriting window. It is intended to be readable by an underwriting committee in a single sitting. Conclusions are *declarative*, not predictive; the Observatory does not represent that the property will, or will not, experience an incident.

§ 3 · OBSERVED CONDUCT

Three actors of *material note*.

Eight actors were characterized in the window. The three documented here are those material to the underwriting decision. Remaining actors are catalogued in the full report.

Declared AI crawler (multi-operator)

● IDENTIFIED · BY NAME

major model labs · self-attributed

CONDUCT OBSERVED Recurrent collection of editorial and methodology surfaces. Observable activity *materially exceeded* declared crawl parameters. Behavioral pattern consistent with training-data harvesting.

RISK CHARACTER Brand-adjacent training-corpus exposure. Not an enforcement event; a material fact for cyber program disclosure.

FRAMEWORK CROSS-REF NIST AI RMF · MEASURE 2.7 · OWASP Top 10 Agentic · ASI01 · RFC 9309 §2.1

CONFIDENCE · HIGH

FILED · OBSERVATORY DESK

Rotating residential-proxy operator

● CHARACTERIZED · BY BEHAVIOR

global · undeclared infrastructure

CONDUCT OBSERVED Activity concentrated on commercially material pages. Pattern coincident with cohort-correlated commercial monitoring observed against additional cohort properties in the same window.

RISK CHARACTER Competitive reconnaissance. Material to renewal-cycle disclosure under broker-of-record questionnaires.

FRAMEWORK CROSS-REF EU AI Act · Art. 15 · Colorado AI Act · SB 24-205 · MITRE ATLAS · AML.T0010

CONFIDENCE · MEDIUM

FILED · OBSERVATORY DESK

Agentic browser framework

● CHARACTERIZED · BY BEHAVIOR

browser-like fingerprint · principal opaque

CONDUCT OBSERVED Systematic traversal of methodology and documentation surfaces. Behavioral pattern inconsistent with interactive browsing. Automated readership confirmed through multiple independent indicators.

RISK CHARACTER Forward-looking class of automated readership not characterized by current bot-management telemetry. Material to cyber program forward-look.

FRAMEWORK CROSS-REF MITRE ATLAS · AML.T0010 · OWASP Top 10 Agentic · ASI01, ASI10 · NIST AI RMF · GOVERN 4.1

CONFIDENCE · MEDIUM-HIGH

FILED · OBSERVATORY DESK

§ 4 · FRAMEWORK MAPPING

What each finding *cross-references.*

The Observatory presents findings against frameworks the underwriting committee, the broker, and counsel already cite. The mapping is verifiable against the public verification ledger.

<p>NIST AI RMF RISK MANAGEMENT FRAMEWORK</p>	<p>Findings № 01 and № 03 cross-reference MEASURE 2.7 (operational monitoring) and GOVERN 4.1 (organizational accountability for AI risk). Receiver-side observation provides the measurement signal NIST anticipates but does not provide a method for.</p>	<p>MAPPED</p>
<p>OWASP Top 10 · Agentic TOP 10 FOR AGENTIC APPLICATIONS</p>	<p>Findings № 01 and № 03 cross-reference ASI01 (Agent Goal Hijack) and ASI10 (Rogue Agents). Behavioral characterization of agentic readership is OWASP's stated detection challenge.</p>	<p>MAPPED</p>
<p>MITRE ATLAS ADVERSARIAL THREAT LANDSCAPE FOR AI</p>	<p>Findings № 02 and № 03 cross-reference AML.T0010 (AI Supply Chain Compromise). The receiver-side observation supplies behavioral evidence consistent with ATLAS technique definitions.</p>	<p>MAPPED</p>
<p>EU AI Act · Art. 15 ACCURACY, ROBUSTNESS, CYBERSECURITY</p>	<p>Finding № 02 is material to Art. 15 disclosure for high-risk AI system operators. The conduct described constitutes relevant external exposure regardless of the operator's enforcement disposition.</p>	<p>MAPPED</p>
<p>Colorado AI Act · SB 24-205 CONSUMER PROTECTION · AI SYSTEMS</p>	<p>Finding № 02 material to reasonable-care duty for property operators in Colorado-touching commerce. The Observatory does not opine on legal sufficiency; the finding is presented as fact.</p>	<p>MAPPED</p>
<p>RFC 9309 ROBOTS EXCLUSION PROTOCOL, FORMALIZED</p>	<p>Finding № 01 cross-references RFC 9309 §2.1 (compliance expectations). The Observatory does not enforce; the cross-reference is a matter of recorded fact.</p>	<p>MAPPED</p>
<p>ISO/IEC 27001 INFORMATION SECURITY MANAGEMENT</p>	<p>Cross-reference to A.5.7 (Threat intelligence) and A.8.16 (Monitoring activities). Receiver-side evidence is admissible as monitoring artifact in 27001-aligned management systems.</p>	<p>MAPPED</p>

§ 5 · METHODOLOGY & CHAIN OF CUSTODY

How the evidence was *produced*.

¶ 5.1 **Independent instrumentation at the property boundary.** Observation occurred where automated activity reaches the property. The Observatory does not displace existing security systems; it records conduct they do not.

¶ 5.2 **Behavioral characterization, independent of declared identity.** Operators were characterized by what they did, not solely by what they declared. Identity claims were recorded; they were not treated as conclusive. This is the methodological position the Observatory exists to make legible.

CHAIN OF CUSTODY · ED25519 · VERIFIABLE

DOCUMENT HASH	sha256: 8e3a4f7b9c0d2e5f1a6b8c4d7e9f0a2b3c5d8e1f4a7b0c3d6e9f2a5b8c1d4e7f
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SIGNING KEY	k1.ed25519.6f2b...c8a7 · listed at botconduct.org/verification/
SIGNED AT	2026-05-17T14:02:14Z · UTC
LEDGER ENTRY	№ 0428-A · Cycle 05 · 2026

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¶ 5.3 **Reports verifiable independently of WAF or CDN stack.** The evidence does not depend on which perimeter products sit in front of the property. An underwriter, broker, or counsel can verify the chain of custody on their own infrastructure, without trusting either the Observatory or the vendor whose product would otherwise be under evaluation.

§ 6 · CONCLUSIONS FOR THE UNDERWRITING DECISION

Recorded, not recommended.

Pre-bind assessments are presented as evidence, not advisory. The conclusions below describe what the Observatory *recorded*. Their disposition belongs to the broker, the underwriting committee, and the property owner.

№ 01

Surface exposure to declared AI crawlers is materially present.

For underwriters whose programs evaluate AI-related exposure as a disclosed risk vector, this finding is material to disclosure. The Observatory does not opine on whether the exposure qualifies for adjusted terms.

CROSS-REF

§ 3 actor № 01
§ 4 NIST · OWASP · RFC 9309

№ 02

Reconnaissance traffic coincides with cohort-correlated commercial monitoring.

Cohort correlation distinguishes this finding from ambient internet noise. Underwriters with a portfolio view of similar properties may already be aware of the operator class; the Observatory makes the specific incidence against the subject explicit.

CROSS-REF

§ 3 actor № 02
§ 4 EU AI Act · Colorado · ATLAS

№ 03

Agentic readership constitutes forward-looking exposure.

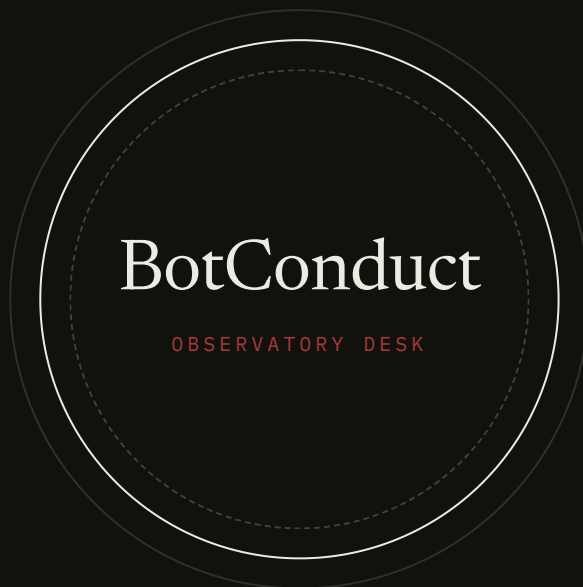
The relevant time horizon is the renewal cycle, not the bind cycle. Cyber programs without a measurement signal for agentic conduct will be unable to characterize this exposure on next renewal. The Observatory is making the signal available now.

CROSS-REF

§ 3 actor № 03
§ 4 MITRE · OWASP · NIST GOVERN

¶ 6.1

The Observatory operates as a *closed oracle*. Findings are disclosed; method is not. This protects the integrity of receiver-side observation against operator adaptation and preserves the long-term value of the cohort. Verification of any finding does not require disclosure of method – only of signature.



*Evidence, not enforcement. Identity may be declared.
Conduct, at receiver-side, cannot.*



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ENGAGEMENTS BY APPOINTMENT
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