



LLC "KPMG"  
Akademiya Business Center  
49, Ul. Platonova  
Minsk, Belarus 220012  
Telephone + 375 740 740 90 90  
Fax + 375 740 740 97 97  
Internet [www.kpmg.by](http://www.kpmg.by)

**Independent Practitioner's Limited Assurance Report on the statement of compliance of Currency Com Bel LLC as at 31 December 2020 and during 2020 with the requirements in clause 4 of the *Regulation on Requirements that Certain Applicants Should Comply with to be Registered as Residents of the High-Tech Park* approved by the decision of the Supervisory Board of the High-Tech Park**

To the Management of Currency Com Bel LLC

## Introduction

According to Contract No. C-BLO-20-00165 dated 7 December 2020, we were engaged by the Management of Currency Com Bel LLC ("the Management") to report on the Management's Statement of Compliance of Currency Com Bel LLC ("the Company") with the requirements specified in clause 4 of the *Regulation on Requirements that Certain Applicants Should Comply with to be Registered as Residents of the High-Tech Park* approved by the decision of the Supervisory Board of the High-Tech Park ("the HTP") (Minutes No. 08/NS-5pr dated 23 October 2018) ("the Regulation requirements"), in the form of a limited assurance conclusion that nothing has come to our attention that causes us to believe that the Management's Statement of compliance of the Company with the Regulation requirements as at 31 December 2020 and during 2020, is not, in all material respects, fairly stated.

## Management's Responsibilities

The Management is responsible for compliance with the Regulation requirements and for preparing the attached Statement of compliance with the Regulation requirements that is free from material misstatement and the information contained therein.

This responsibility includes designing, implementing and maintaining internal control system relevant to the preparation of the Statement that is free from material misstatement, whether due to fraud or error. It also includes compiling with the Regulation requirements; identifying and ensuring that the Company complies with laws and regulations applicable to its activities; preventing and detecting of fraud; selecting and applying appropriate policies;

Engaging entity: Currency Com Bel LLC

Registration number in the Unified State Register of Legal Entities and Individual Entrepreneurs: No. 193130368.

Minsk, Belarus

Audit firm (Practitioner): LLC "KPMG", a company incorporated under the Laws of the Republic of Belarus and a member firm of the KPMG global organization of independent member firms affiliated with KPMG International Limited, a private English company limited by guarantee.

Registration number in the Unified State Register of Legal Entities and Individual Entrepreneurs: No. 191434140.



## Currency Com Bel LLC

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maintaining adequate records in relation to the Statement of compliance with the Regulation requirements.

### Our Responsibilities

Our responsibility is to perform procedures to obtain evidence in respect of the Statement of compliance with the Regulation requirements prepared by the Management and to report thereon in the form of a limited assurance conclusion regarding the Statement, based on the evidence obtained.

We conducted our engagement in accordance with International Standard on Assurance Engagements 3000 (revised) *Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* (ISAE 3000) issued by the International Auditing and Assurance Standards Board.

ISAE 3000 requires that we plan and perform our procedures to obtain a meaningful level of assurance about whether the Management's Statement that the Company has complied with the Regulation requirements is fairly stated.

### Our Independence and Quality Control

We have complied with the independence and ethical requirements established by the Law of the Republic of Belarus No. 56-3 dated 12 July 2013 *On Auditing* (with the latest changes and amendments) and by the *International Code of Ethics for Professional Accountants (including International Independence Standards)* issued by the International Ethics Standards Board for Accountants, which are based on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

We apply the *International Standard on Quality Control 1*, and accordingly maintain a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

### Procedures Performed

The procedures selected, and our determination of the nature, timing and extent of these procedures, depend on our judgment, including the assessment of risk of material misstatement of the Management's Statement of compliance with the Regulation requirements, whether due to fraud or error, our understanding of the Company's activities, as well as other engagement circumstances.

Our engagement also included: assessing the appropriateness of the Statement of compliance with the Regulation requirements, the suitability of the criteria used by the Management in preparing the Statement (as set out in the *Criteria used* section of this report) in the circumstances of the engagement.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower



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than the assurance that would have been obtained had a reasonable assurance engagement been performed.

As part of this engagement, we have not performed any procedures by way of audit, review or other assurance procedures with respect to the underlying records or other source information serving as the basis for the Management's Statement of compliance with the Regulation requirements.

Our procedures, based on the risk assessment performed, were a combination of inspection, inquiry and examination of information, including from independent sources, interviews of responsible persons and recalculation.

In addition, within our engagement we have performed procedures with respect to information included in the questionnaires, prepared by the Management in accordance with Appendices 1 and 2 to the Regulation, and representations made by the Management in accordance with the Regulation.

More detailed information on the performed procedures is included in Attachment 1 to this report.

### **Criteria Used**

To evaluate the Management's Statement of compliance with the Regulation requirements we used relevant requirements of the *Regulation on Requirements that Certain Applicants Should Comply with to be Registered as Residents of the High-Tech Park* approved by the decision of the Supervisory Board of the High-Tech Park (Minutes No. 08/NS-5pr dated 23 October 2018).

### **Conclusion**

Our conclusion has been formed on the basis of, and is subject to, the matters outlined in this report. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Based on the procedures performed, nothing has come to our attention that causes us to believe that the attached Management's Statement of compliance of the Company as at 31 December 2020 and during 2020 with the Regulation requirements is not, in all material respects, fairly stated.



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**Restriction on Use**

We have assessed the attached Management's Statement of compliance with the Regulation requirements based on criteria as set out in the *Criteria used* section of this report. These criteria and the Management's Statement of compliance with the Regulation requirements are intended solely for the purpose of the Company's fulfillment of certain legal and the HTP requirements for the HTP's residents. As a result, these criteria and the Management's Statement of compliance with the Regulation requirements may not be suitable for a party other than the HTP, and our report should not be considered suitable for no other purposes or in any other context.

Irina Vereschagina  
Director

LLC "KPMG"  
Minsk, Belarus

31 March 2021



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**Attachment 1. Attachment to Independent Practitioner's Limited Assurance Report on the statement of compliance of Currency Com Bel LLC as at 31 December 2020 and during 2020 with the requirements specified in clause 4 of the Regulation on Requirements that Certain Applicants Should Comply with to be Registered as Residents of the High-Tech Park approved by the decision of the Supervisory Board of the High-Tech Park**

**Abbreviations used for regulatory acts:**

the Regulation                                      Regulation on Requirements that Certain Applicants Should Comply with to be Registered as Residents of the High-Tech Park approved by the decision of the Supervisory Board of the High-Tech Park (Minutes No. 08/NS-5pr dated 23 October 2018)<sup>1</sup>

Seq. No.	No. of the Regulation requirement	Regulation requirement	Description of procedures performed by LLC "KPMG" <sup>2</sup>
1	Chapter 1 Clause 4 (Paragraph 2 of Part 1), Chapter 2	Existence of persons defined in the Regulation who ensure the functioning of	See procedures below.

<sup>1</sup>

[https://park.by/upload/form/%D0%A2%D1%80%D0%B5%D0%B1%D0%BE%D0%B2%D0%B0%D0%BD%D0%B8%D1%8F%20%D0%BA%20%D0%B7%D0%B0%D1%8F%D0%B2%D0%B8%D1%82%D0%B5%D0%BB%D1%8F%D0%BC%20\(%D1%81%2019.11.2020\).pdf](https://park.by/upload/form/%D0%A2%D1%80%D0%B5%D0%B1%D0%BE%D0%B2%D0%B0%D0%BD%D0%B8%D1%8F%20%D0%BA%20%D0%B7%D0%B0%D1%8F%D0%B2%D0%B8%D1%82%D0%B5%D0%BB%D1%8F%D0%BC%20(%D1%81%2019.11.2020).pdf)

<sup>2</sup> Local regulations, Statute, reports on the status of information systems, internal controls, technical audits, financial statements, documents on the beneficiary structure of the Company, profiles of beneficial owners, job descriptions, employment records, employment / civil law contracts, documents confirming the education and questionnaires completed for persons who ensure the functioning of the Company, as well as responses to inquiries from state bodies (General Directorate of Internal Affairs of Minsk City Executive Committee, the Supreme Court of the Republic of Belarus) and other documents indicated below and analysed by us for the purposes of this report are internal documents of the Company and



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Seq. No.	No. of the Regulation requirement	Regulation requirement	Description of procedures performed by LLC "KPMG" <sup>2</sup>
		the Company and meet the established requirements	
1.1	Chapter 2 Clause 5	Existence of persons who ensure the functioning of the Company, including requirements relating to the allocation of responsibilities, format of the employment relationship, amount of remuneration	We have requested and reviewed job descriptions, employment / civil law contracts, employment records of those responsible for the functioning of the Company (head, chief accountant, officer in charge of system administration and information security, officer in charge of risk management, officer responsible for compliance with the requirements for the prevention of money laundering, terrorist financing and financing the spread of mass destruction weapons (the officer responsible for AML/CFT compliance), the officer responsible for compliance with the HTP regime), the organisational structure and other internal documents of the Company.
1.2	Chapter 2 Clause 5 (Part 6), Appendix 1	Questionnaires completed for persons who ensure the functioning of the Company	We have requested and reviewed the questionnaires completed for the head, the chief accountant, the officer responsible for system administration and information security, the officer responsible for risk management, the officer responsible for AML/CFT compliance, the officer responsible for compliance with the HTP regime.
1.2.1	Appendix 1, Form 1	Questionnaire completed for the Company Head and details included therein	We have requested and reviewed documents confirming the education, employment records, and responses to inquiries from state bodies (General Directorate of Internal Affairs of the Minsk City Executive Committee, the Supreme Court of the Republic of Belarus). We have also reviewed independent sources of information <sup>3</sup> regarding the matters in the questionnaire and conducted interviews with the head of the Company.

are not subject to public disclosure (except for those documents referred to in the text). These documents may be obtained from the HTP regime compliance officer by making a relevant request to the Company.

<sup>3</sup> Hereinafter we note that there are no public registers containing information on individuals with criminal records, breaches of employment conditions, education and work experience in the Republic of Belarus, therefore hereinafter we have only studied available public sources, including the media and social networks.



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Seq. No.	No. of the Regulation requirement	Regulation requirement	Description of procedures performed by LLC "KPMG" <sup>2</sup>
1.2.2	Appendix 1, Form 2	Questionnaire completed for the Chief Accountant of the Company and details included therein	We have requested and reviewed documents confirming the education, employment records, and responses to inquiries from state bodies (General Directorate of Internal Affairs of the Minsk City Executive Committee, the Supreme Court of the Republic of Belarus). We have also reviewed independent sources of information regarding the matters in the questionnaire and conducted interviews with the chief accountant of the Company.
1.2.3	Appendix 1, Form 3	Questionnaire completed for the officer responsible for system administration and information security of the Company and the information included therein	We have requested and reviewed documents confirming the education, employment records, and responses to inquiries from state bodies (General Directorate of Internal Affairs of the Minsk City Executive Committee, the Supreme Court of the Republic of Belarus). We have also reviewed independent sources of information regarding the matters in the questionnaire and conducted interviews with the officer responsible for system administration and information security of the Company.
1.2.4	Appendix 1, Form 4	Questionnaire completed for the officer responsible for the Company's risk management and the information included therein	We have requested and reviewed documents confirming the education, employment records, and responses to requests from state bodies (General Directorate of Internal Affairs of the Minsk City Executive Committee, the Supreme Court of the Republic of Belarus). We have also reviewed independent sources of information regarding the matters in the questionnaire and conducted interviews with the officer responsible for the Company's risk management.
1.2.5	Appendix 1, Form 5	Questionnaire completed for the officer responsible for AML/CFT compliance and the information included therein	We have requested and reviewed documents confirming the education, employment records, and responses to inquiries from state bodies (General Directorate of Internal Affairs of the Minsk City Executive Committee, the Supreme Court of the Republic of Belarus). We have also reviewed independent sources of information regarding the matters in the questionnaire and conducted interviews with the officer responsible for AML/CFT compliance.



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Seq. No.	No. of the Regulation requirement	Regulation requirement	Description of procedures performed by LLC "KPMG" <sup>2</sup>
1.2.6	Appendix 1, Form 6	Questionnaire completed for the officer responsible for compliance with the HTP regime and the information entered therein	We have requested and reviewed documents confirming the education, employment records, and responses to inquiries from state bodies (General Directorate of Internal Affairs of the Minsk City Executive Committee, the Supreme Court of the Republic of Belarus). We have also reviewed independent sources of information regarding the questions in the questionnaire and conducted interviews with the officer responsible for compliance with the HTP regime.
1.3	Chapter 2 Clause 6	Qualification requirements for the Company Head	We have requested and reviewed documents related to education and qualifications.
1.4	Chapter 2 Clause 7	Qualification requirements for the Chief accountant of the Company	We have requested and reviewed documents and certificates of education and qualifications, other evidence of declared training, and employment records.
1.5	Chapter 2 Clause 8	Qualification requirements for the officer responsible for system administration and information security	We have requested and reviewed documents related to education and qualifications, employment records.
1.6	Chapter 2 Clause 9	Requirements to good repute of those who ensure the functioning of the Company	We have requested and reviewed responses to inquiries from state bodies (General Directorate of Internal Affairs of the Minsk City Executive Committee, the Supreme Court of the Republic of Belarus). We have also additionally searched publicly available sources of information on the business reputation of those individuals.
2	Chapter 1 Clause 4 (Paragraph 3,4 of Part 1), Chapter 3	Requirements for the disclosure of information about the owner (founders, participants) and the beneficial owners	See procedures below.
2.1	Chapter 3 Clause 10	List of beneficial owners	We have requested and reviewed documents containing the list of the Company's beneficial owners and searched public sources for relevant information.
2.2	Chapter 3 Clause 10	Requirement to the beneficiary structure	We have requested and reviewed documents on the corporate (organisational) structure of the Company and the beneficial owners and have searched public sources for relevant information.





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Seq. No.	No. of the Regulation requirement	Regulation requirement	Description of procedures performed by LLC "KPMG" <sup>2</sup>
2.3	Chapter 3 Clause 10 (Part 5), Appendix 2	Questionnaires completed for the beneficial owners and the property owner (founders, participants)	We have requested and reviewed questionnaires regarding two beneficial owners of the Company. Beneficial owners' questionnaires, documents disclosing the ownership structure of the Company, and comments from the Company's officers responsible for the functioning of the Company that were received during interviews supported that the information required to be disclosed in the questionnaires for owners complies with the established requirements.
3	Chapter 1 Clause 4	Disclosure by the Company in respect of itself, as well as ensuring the disclosure (confirmation) by its owner (founders, participants), beneficial owners of the information specified in the Regulation	See procedures below.
3.1	Appendix 2, Form 1	Questionnaire completed for the applicant's beneficial owner	We have searched public sources for information about the beneficial owners and received comments from officers who ensure the functioning of the Company.
3.2	Appendix 2, Form 2	Questionnaire completed for the owner (founder, participant) of the Company	We have searched public sources for information about the Company's owner and received comments from officers who ensure the functioning of the Company.
3.3	Chapter 3 Clause 11	Requirements for the beneficial owners and the owner of the Company or the founder (participant) of the Company	We have searched for information in public sources and conducted interviews with those who ensure the functioning of the Company.
3.4	Chapter 3 Clause 12	Disclosure by the Company of information in respect of itself, its owner (founders, participants), beneficial owners	We have searched for information in public sources, corporate registries, and conducted interviews with those who ensure the functioning of the Company.
4	Chapter 1 Clause 4	Requirements to have no cases of deregistration from the HTP's residents of the Company, its owner (founder, participant), beneficial owner, or a legal entity whose owner (founder, participant) is (was) the beneficial owner of the Company	We have obtained and reviewed documents disclosing the Company's ownership structure, comments received during interviews from the Company's officers who ensure functioning of the Company, responses to inquiries from state bodies, the HTP, and searched publicly available sources of information and the HTP's corporate register.



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Seq. No.	No. of the Regulation requirement	Regulation requirement	Description of procedures performed by LLC "KPMG" <sup>2</sup>
		during 3 years prior to the date of application for registration as an HTP resident	
5	Chapter 1 Clause 4	Requirements to have no cases of material and/or systematic (two or more times) breach of token related liabilities by the Company, its owner (founder, participant), beneficial owner, or a legal entity whose owner (founder, participant) is (was) the beneficial owner of the Company during 3 years prior to the date of application for registration as an HTP resident	We have obtained and reviewed documents disclosing the Company's ownership structure, comments received during interviews from the Company's officers who ensure functioning of the Company, responses to inquiries from state bodies, the HTP, and searched publicly available sources of information.
6	Chapter 1 Clause 4, Chapter 4 (Part 14,15)	Requirements regarding the sufficient business experience of the Company, and/or its head, and/or its beneficial owners, and/or the owner	We have requested and reviewed the employment records of the head of the Company, searched for relevant information in public sources and conducted interviews with officers who ensure the functioning of the Company.
7	Chapter 1 Clause 4	Requirements for the statutory capital	We have requested and reviewed the Statute, the financial statements as at 31 December 2020 and the payment order, which confirm that the statutory capital of the Company meets the requirements set out in the Regulation.
8	Chapter 1 Clause 4, Chapter 5	Requirements for complying with financial ratios	We have requested the financial statements as at 31 December 2020, on the basis of which we have calculated the financial ratios in accordance with the formulas specified in the Regulation, we have interviewed persons who ensure the functioning of the Company.
9	Chapter 1 Clause 4 (Paragraph 12 of Part 1)	Requirements for the existence of an Internet website which the Company has the	We have visited the Company's website <sup>4</sup> , obtained and reviewed the documents confirming the Company's rights to use the domain name.

<sup>4</sup> <https://currency.com/ru>



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Seq. No.	No. of the Regulation requirement	Regulation requirement	Description of procedures performed by LLC "KPMG" <sup>2</sup>
		right to use, or the existence of the right of the Company to use the domain name	
10	Chapter 1 Clause 4	Requirements for the existence of local regulations (LR), other documents and implementation of organisational measures	We have requested and reviewed the LRs that have been developed and approved in the Company as required by the Regulation and confirmed their existence and effectiveness for the period from 1 January 2020 to 31 December 2020. We have also interviewed persons who ensure the functioning of the Company.
10.1	Chapter 6 Clause 19	Organisation of risk management	We have requested and reviewed the LR governing risk management in the Company, the job description of the officer responsible for risk management, reports of this officer on results of risk monitoring in the Company for the period from 1 January 2020 to 31 December 2020, and conducted an interview with the responsible officer.
10.2	Chapter 6 Clause 20	Implementation of internal control over compliance with the HTP regime	We have requested and reviewed the LR regulating the implementation of internal control over compliance with the HTP regime in the Company, the job description of the officer responsible for compliance with the HTP regime, reports of this officer on results of internal control for the period from 1 January 2020 to 31 December 2020, and conducted an interview with the responsible officer.
10.3	Chapter 6 Clause 21	Prevention from money laundering, terrorist financing and financing of the spread of mass destruction weapons	We have requested and reviewed the AML/CFT related internal control regulations, the job description of the officer responsible for AML/CFT compliance, documents confirming the right to use the software (supplied by the companies mentioned in the Regulation) that allows the aggregation, analysis and risk assessment of AML/CFT compliance by customers, as well as conducted interviews with the responsible officer.



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Seq. No.	No. of the Regulation requirement	Regulation requirement	Description of procedures performed by LLC "KPMG" <sup>2</sup>
10.4	Chapter 6 Clause 22	LR on conflict of interest management	We have requested and reviewed the LR governing the management of conflicts of interest in the Company <sup>5</sup> and conducted interviews with those responsible for the functioning of the Company.
10.5	Chapter 6 Clause 23	LR and policies on outsourcing	We have requested and reviewed the LR governing outsourcing requirements and conducted interviews with those responsible for the functioning of the Company.
10.6	Chapter 6 Clause 25	Developing the general terms of token trading	We have requested and reviewed the LR governing requirements for developing the general terms of token sale <sup>6</sup> , conducted interviews with those responsible for the functioning of the Company.
10.7	Chapter 6 Clause 26	User support requirements	We have requested and reviewed the LR governing the requirements and procedures for user support, the job description of the officer responsible for user support and conducted interviews with the head and the officer responsible for user support.
10.8	Chapter 6 Clause 27	Requirements to have software and technical measures in place to ensure that all client actions are recorded	We have requested and reviewed LRs describing the Company's system processes, information security reports for the period from 1 January 2020 to 31 December 2020 and conducted interviews with those responsible for the functioning of the Company.
10.9	Chapter 6 Clause 28	LR of the crypto platform operator	We have requested and reviewed LRs governing the Company's activities as a crypto platform operator (including a description of the procedure for token trading; obtaining token trading status by a client; token admission to trading; determining the amount and procedure for charging fees to clients; entering into transactions in the interests of clients; prevention, detection and suppression of cases of misuse of insider information on tokens and token price

<sup>5</sup> <https://currency.com/ru/konflikt-interesov>

<sup>6</sup> [https://currency.com/static/Currencycom\\_general\\_conditions\\_for\\_tokens\\_alienation\\_20200513\\_ru.pdf](https://currency.com/static/Currencycom_general_conditions_for_tokens_alienation_20200513_ru.pdf)



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Seq. No.	No. of the Regulation requirement	Regulation requirement	Description of procedures performed by LLC "KPMG" <sup>2</sup>
			manipulation; interaction with payment services providers; separate accounting of money, electronic money, tokens; granting token trader access to the trading system; making transactions with tokens outside the trading system), conducted interviews with those responsible for the functioning of the Company.
10.10	Chapter 9 Clause 35	Organisation of information security (cybersecurity)	We have requested and reviewed the job description of the officer responsible for system administration and information security and interviewed him.
10.11	Chapter 9 Clause 36	LR for information security (cybersecurity)	We have requested and reviewed the LR governing information security (cybersecurity) and interviewed the official responsible for system administration and information security in the Company.
10.12	Chapter 9 Clause 37	Organisation of system administration and information security (cybersecurity), segregation of duties	We have requested and reviewed LR governing information security (cybersecurity) and segregation of risk management and the officer responsible for risk management and the officer responsible for system administration and information security, information security reports for the period from 1 January 2020 to 31 December 2020, conducted interviews with the officer responsible for system administration and information security in the Company.
10.13	Chapter 9 Clause 38	LR on the protection of information (including client-related information) and tokens in the possession of the applicant	We have requested and reviewed LRs governing the protection of information and tokens in the applicant's possession and interviewed those responsible for the functioning of the Company.
10.14	Chapter 9 Clause 39	LR on the smooth operation of the information system, plan for the prompt restoration of the information system after disruption	We have requested and reviewed the LR governing the smooth operation of the information system and its prompt restoration and conducted an interview with the officer responsible for system administration and information security in the Company.
10.15	Chapter 9 Clause 40	Organisation of information security (cybersecurity) system monitoring	We have requested and reviewed the LR governing information security (cybersecurity) system monitoring, information security reports for the period from 1 January 2020 to 31 December 2020 and conducted an interview with the officer responsible for system administration and information security in the Company.



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Seq. No.	No. of the Regulation requirement	Regulation requirement	Description of procedures performed by LLC "KPMG" <sup>2</sup>
10.16	Chapter 9 Clause 41	Organisation of information security (cybersecurity) testing	We have requested and reviewed the LR containing requirements for information security (cybersecurity) testing, reports on testing results and conducted an interview with the officer responsible for system administration and information security in the Company.
10.17	Chapter 9 Clause 42	LR on the organisation of information security (cybersecurity) training and knowledge testing of employees	We have requested and reviewed LR governing the information security (cybersecurity) training and knowledge testing of employees, documents on conducted trainings and tests for the period from 1 January 2020 to 31 December 2020, conducted interviews with those who ensure the functioning of the Company.
11	Chapter 1 Clause 4	Audited information system	See procedures below.
11.1	Chapter 7 Clause 29	Availability and content of the information system audit report	We have requested and reviewed the latest report resulting from the technical audit of the information system dated 12 November 2018. We have requested and reviewed monthly information security reports for the period from 1 January 2020 to 31 December 2020, which contained information about the information system's status, conducted an interview with the officer responsible for system administration and information security in the Company, requested and analysed the information about changes in the Company's information system after the date of the latest technical audit.

**Management's Statement of compliance with the requirements specified in clause 4 of the Regulation on Requirements that Certain Applicants Should Comply with to be Registered as Residents of the High-Tech Park approved by the decision of the Supervisory Board of the High-Tech Park (Minutes No. 08/NS-5pr dated 23 October 2018)**

As at 31 December 2020 and during 2020 Currency Com Bel LLC ("the Company") has complied with the requirements specified in clause 4 of the Regulation on Requirements that Certain Applicants Should Comply with to be Registered as Residents of the High-Tech Park approved by the decision of the Supervisory Board of the High-Tech Park (Minutes No. 08/NS-5pr dated 23 October 2018) ("the Regulation"), in particular the requirements to:

- have persons, as specified in the Regulation, who ensure the functioning of the Company and comply with the requirements specified in the Regulation;
- have an owner (founders, participants) and beneficial owners of the Company who comply with the requirements specified in the Regulation;
- disclose in respect of itself, as well as to ensure disclosure (confirmation) by its owner (founders, participants), beneficial owners of the information specified in the Regulation;
- during 2020, have no cases of deregistration from residents of the Hi-Tech Park ("the HTP") of the Company, its owner (founder, participant), beneficial owners, or a legal entity whose owner (founder, participant) is (was) the beneficial owner of the Company, on the grounds provided for in paragraphs four and (or) five of clause 41 of the Regulation on the HTP;
- during 2020, have no cases of material and/or systematic (two or more times) breach of the token related liabilities by the Company, its owner (founder, participant), beneficial owners, or a legal entity whose owner (founder, participant) is (was) the beneficial owner of the Company;
- have sufficient business experience in one or several areas provided for in clause 15 of the Regulation;
- have statutory capital formed in the amount of at least 2 million Belarusian rubles. The Company's net assets as at 31 December 2020 were not less than the statutory capital;
- comply with the financial ratios specified in the Regulation;
- have local regulations, other documents and implement organisational measures specified in the Regulation;
- have information system used in the Company's activities and audited in accordance with the Regulation (confirmed by the report dated 12 November 2018 on the results of the audit);
- have an Internet website, the right to use this website and the domain name.

Aleksandr Shevchenko  
General Manager  
Currency Com Bel LLC



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Limited Liability Company «Currency Com Bel»

Republic of Belarus, Minsk city, Internatsionalnaya street, 36-1, office 724, room 2.

UNP 193130368