



LLC Currency Com Bel

Independent practitioner Report on the assignment with limited assurance engagement in respect to Compliance Statement of LLC Currency Com Bel as of December, 31, 2020 and for 2020 to requirements of Clause 4 of Requirement Regulation, which should be responded by individual applicants for their registration as residents of the Belarus High Technologies Park, approved by decision of the Supervisory board of the Belarus High Technologies Park
Page

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To the Management of LLC Currency Com Bel

Introduction

According to Agreement n. C-BLO-20-00165 of 07.12.2020 the Management of *LLC Currency Com Bel* (hereinafter referred to as the Management) subcontracted us to perform an assignment and by its completion we provide a report regarding the attached Management Compliance Statement of *LLC Currency Com Bel* (hereinafter referred to as the Company) to requirements of Clause 4 of *Requirement Regulation, which should be responded by individual applicants for their registration as residents of the Belarus High Technologies Park* (hereinafter referred to as the *HTP*), approved by decision of the Supervisory board of the *HTP* of the Republic of Belarus (Record n. 08/HC-5pp of October, 23, 2018) (hereinafter referred to as the Requirements Regulation). We've concluded with limited assurance engagement that as the result of the work completed there are no evidence that could attract our attention and could give us reasons to suggest that the attached Management Statement on compliance of the Company to required regulations as of December, 31, 2020 and for 2020 is not in any material respect faithful.

Management's Responsibility

The Management takes responsibility for meeting requirements of the Regulation and for preparation of the attached Statement on compliance to the requirement of the Regulation without material misstatement, as well as for the information contained.



LLC Currency Com Bel

Independent practitioner Report on the assignment with limited assurance engagement in respect to Compliance Statement of LLC Currency Com Bel as of December, 31, 2020 and for 2020 to requirements of Clause 4 of Requirement Regulation, which should be responded by individual applicants for their registration as residents of the Belarus High Technologies Park, approved by decision of the Supervisory board of the Belarus High Technologies Park
Page

Its responsibility also includes development, implementation and support of internal control system, applied for preparation of the above-mentioned Statement, without any material misstatements due to fraud or error, as well as meeting requirements of the Regulation; identification and conformance with laws and regulations, applicable to the operation of the Company; fraud prevention and its detection; selection and application of competent policies; adequate record maintenance relating to the Compliance Statement to requirements of the Regulation.

Our responsibility

Our responsibility involves procedures in order to obtain evidence relating to the Compliance Statement to requirements of the Regulation prepared by the Management, and to submit the report with limited assurance engagement in respect of credibility of the above-mentioned Statement, based on the evidence provided.

We've completed our assignment according to the International Standard on Assurance Engagement 3000 (revised) *Assurance engagement other than audits or reviews of historical financial information* (hereinafter referred to as the ISAE 3000), released by the International Auditing and Assurance Standards Board.

The ISAE 3000 requires planning and carrying out of our procedures to the effect, that to get significant assurance in respect of credibility of the Management Statement on compliance of the Company with requirements of the Regulation as the evidence for our conclusion with limited assurance engagement.

Our Independence and Quality Control

We comply with the requirements of independence and professional ethics, determined by the law on Auditing of the Republic of Belarus n. 56-3 of July, 12, 2013 (with subsequent amendments and additions) and the International Code of Ethics for Professional Accountants (including international standards of independency) of the International Ethics Standards Board for Accountants, which are based on fundamental principles of fairness, credibility, expertise and due care, privacy and professional behaviour.

We practice according to the International Standard on Quality Control 1 and therefore maintain integrated quality control system, which includes recorded policies and procedures of ethical practices, professional standards and requirements of regulations.



LLC Currency Com Bel

Independent practitioner Report on the assignment with limited assurance engagement in respect to Compliance Statement of LLC Currency Com Bel as of December, 31, 2020 and for 2020 to requirements of Clause 4 of Requirement Regulation, which should be responded by individual applicants for their registration as residents of the Belarus High Technologies Park, approved by decision of the Supervisory board of the Belarus High Technologies Park
Page

Procedures

The choice of procedures and our decision on their nature, terms and extend, depends on our professional judgement including risk assessment of material misstatement of the Management Statement on Compliance with requirements of the Regulation due to fraud or error; our understanding of operation of the Company or other circumstances of the assignment.

Our assignment has also included the assessment of the fact that the Statement on compliance to requirements of the Regulation is competent; and the criteria, used by the Management while preparing the above-mentioned Statement (they are submitted in Section *Applied Criteria* of the present Report), are acceptable with regard to the circumstances of the assignment.

The procedures within the assignment with limited assurance engagement differ in their nature, terms and are more limited in comparison to the procedures within the assignment with reasonable assurance engagement. As a consequence, the assurance level, obtained as the result of the assignment completed with limited assurance engagement is significantly lower than the assurance level, obtained as the result of the assignment performed with reasonable assurance level.

Within the current assignment we haven't conducted any auditing procedures, review engagement or other assurance engagements in respect of initial information, data, documentation or other sources, which serve as a basis to prepare the Statement on compliance with requirements of the Regulation.

Our procedures, developed on the basis of the conducted risk assessment, have constituted a combination of inspection, requests and information study including that one from independent sources, questionnaires of the competent individuals and restatements.

Additionally, we've conducted procedures in respect of the data which are contained in questionnaires, prepared by the Management according to Appendix 1 and 2 to the Regulation, as well as to the acknowledgement of the Management, made according to the Regulation.

Further information regarding the procedures we've carried out is added to Appendix 1 to the present Regulation.

Applied Criteria



LLC Currency Com Bel

Independent practitioner Report on the assignment with limited assurance engagement in respect to Compliance Statement of LLC Currency Com Bel as of December, 31, 2020 and for 2020 to requirements of Clause 4 of Requirement Regulation, which should be responded by individual applicants for their registration as residents of the Belarus High Technologies Park, approved by decision of the Supervisory board of the Belarus High Technologies Park
Page

By carrying out the assessment of the Management Statement on compliance to requirements of the Regulation relevant requirements were used, which should be responded by individual applicants for their registration as residents of the *Belarus High Technologies Park*, approved by decision of the Supervisory board of the of the *Belarus High Technologies Park* (Record N 08/HC-5пп of October, 23, 2018).

Conclusion

Our conclusion has been drawn on the basis and with consideration of the aspects, described in the present Report. We suppose that the evidence obtained is sufficient and adequate to provide the basis for our conclusion.

Based on the results of the procedures performed, we haven't noticed any evidence that could have given us reasons to suggest that the attached Management Statement on compliance of the Company of December 31, 2020 and for 2020 is not in any material respect faithful.

Exercising Restrictions

We've assessed the attached Management Statement on compliance with requirements of the Regulation based on criteria indicated in Section *Applied Criteria* of the present Report. The present criteria and the Management Statement on compliance with requirements of the Regulation is intended solely for meeting particular requirements of the legislation and the *HTP* by the Company, defined for the *HTP* residents. As consequence, these criteria and the Management Statement on compliance with requirements of the Regulation can be unacceptable for the Party, other than the *HTP*, and our Report doesn't imply its usage for other purposes or in other contexts.

Irina Vereschagina
Director

OOO KPMG
Minsk, Belarus

31/03/2021



LLC Currency Com Bel

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Page



LLC Currency Com Bel

Independent practitioner Report on the assignment with limited assurance engagement in respect to Compliance Statement of LLC Currency Com Bel as of December, 31, 2020 and for 2020 to requirements of Clause 4 of Requirement Regulation, which should be responded by individual applicants for their registration as residents of the Belarus High Technologies Park, approved by decision of the Supervisory board of the Belarus High Technologies Park

Page

Appendix 1. Appendix to Independent practitioner Report on the assignment with limited assurance engagement in respect to Compliance Statement of LLC Currency Com Bel as of December, 31, 2020 and for 2020 to requirements of Clause 4 of Requirement Regulation, which should be responded by individual applicants for their registration as residents of the Belarus High Technologies Park, approved by decision of the Supervisory board of the Belarus High Technologies Park

Abbreviations for regulations:

Regulation Requirements regulation, which should be responded by individual applicants for their registration as residents of the Belarus High Technologies Park, approved by decision of the Supervisory board of the Belarus High Technologies Park (Record N 08/HC-5pp of October, 23, 2018)¹

N	N requirements of the Regulation	Requirements of the Regulation	Description of the procedures, performed by <i>OOO KPMG</i> ²
1	Section 1 Clause 4	Presence of individuals, defined by the Regulation, maintaining operation of the	See the procedures below

¹ [https://park.by/upload/form/%D0%A2%D1%80%D0%B5%D0%B1%D0%BF%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%BF%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)

² Local regulations, Charter, reports on state of information systems, internal controls, technical audit, financial statements, documents about beneficial structure of the Company, questionnaires of beneficial owners, job description, employment/independent contractor agreements, degree certificates and employee questionnaires, as well as replies on requests from state bodies (Main Department of Internal Affairs of Minsk City Administration, Supreme Court of the Republic of Belarus) and other documents, indicated below and analysed while preparing the present report, are internal documents of the Company and are not liable for general publication (but not including the documents with the links below). These documents can be obtained from officers, responsible for compliance with the rules of the HTP, by sending a request to the Company.



	(Paragraph 2 Part 1), Section 2	Company and responsible for specified requirements	
1.1	Section 2 Clause 5	Presence of individuals, maintaining operation of the Company, including requirements to assign responsibilities, formalise employment relations, define salary	We've requested and studied job descriptions, employment/independent contractor agreements, employment record books of individuals responsible for the operation of the Company (manager, chief accountant, officer, responsible for system administration and information security; officer, responsible for risk management; compliance officer (officer, responsible for meeting requirements according to AML/CFT); officer, responsible for compliance with the regulations of the <i>HTP</i>), organizational structure, other internal documents of the Company.
1.2	Section 2 Clause 5 (part 6), Appendix 1	Questionnaires of individuals, maintaining operation of the Company	We've requested and studied the questionnaires of manager, chief accountant, officer, responsible for system administration and information security; officer, responsible for risk management; officer, responsible for meeting requirements according to AML/CFT; officer, responsible for compliance with the regulations of the <i>HTP</i> .
1.2.1	Appendix 1. Form 1	Questionnaire of the manager of the Company with recorded data	We've requested and studied degree certifications, employment record book, replies on requests from state bodies (Main Department of Internal Affairs of Minsk City Administration, Supreme Court of the Republic of Belarus). We've also studied third party sources of information on questions from the questionnaires, and interviewed the Manager of the Company



1.2.2	Appendix Form 2	1. Questionnaire of the chief accountant of the Company with recorded data	We've requested and studied degree certifications, employment record book, replies on requests from state bodies (Main Department of Internal Affairs of Minsk City Administration, Supreme Court of the Republic of Belarus). We've also studied third party sources of information on questions from the questionnaires, and interviewed the chief accountant of the Company.
1.2.3	Appendix Form 3	1. Questionnaire of the officer, responsible for system administration and information security of the Company with recorded data	We've requested and studied degree certifications, employment record book, replies on requests from state bodies (Main Department of Internal Affairs of Minsk City Administration, Supreme Court of the Republic of Belarus). We've also studied third party sources of information on questions from the questionnaires, and interviewed the officer, responsible for system administration and information security of the Company.
1.2.4	Appendix Form 4	1. Questionnaire of the officer, responsible for risk management of the company with recorded data	We've requested and studied degree certifications, employment record book, replies on requests from state bodies (Main Department of Internal Affairs of Minsk City Administration, Supreme Court of the Republic of Belarus). We've also studied third party sources of information ³ on questions from the questionnaires, and interviewed the officer, responsible for risk management of the company.

³ Hereinafter we emphasize that in the Republic of Belarus there are no public registers, containing information regarding to individuals and their convictions, violation of labour conditions, information about education and work experience. That is why we've studied only available open sources, including mass media and social networks.



1.2.5	Appendix Form 5	1. Questionnaire of the officer, responsible for meeting requirements according to AML/CFT with recorded data	We've requested and studied degree certifications, employment record book, replies on requests from state bodies (Main Department of Internal Affairs of Minsk City Administration, Supreme Court of the Republic of Belarus). We've also studied third party sources of information on questions from the questionnaires, and interviewed the officer, responsible for meeting requirements according to AML/CFT.
1.2.6	Appendix Form 6	1. Questionnaire of the officer, responsible for compliance with the regulations of the <i>HTP</i> with recorded data	We've requested and studied degree certifications, employment record book, replies on requests from state bodies (Main Department of Internal Affairs of Minsk City Administration, Supreme Court of the Republic of Belarus). We've also studied third party sources of information on questions from the questionnaires, and interviewed the officer, responsible for compliance with the regulations of the <i>HTP</i> .
1.3	Section Clause 6	2 Qualification requirements for the manager of the Company	We've requested and studied degree and qualification certifications.
1.4	Section Clause 7	2 Qualification requirements for the chief accountant of the Company	We've requested and studied degree and qualification certifications, other evidence of competence, employment record book.
1.5	Section Clause 8	2 Qualification requirements for the officer, responsible for system administration and information security in the Company	We've requested and studied degree and qualification certifications, employment record book.
1.6	Section Clause 9	2 Requirements to goodwill of the officers, responsible for operation of the Company	We've requested and studied replies on the requests from state bodies (Main Department of Internal Affairs of Minsk City Administration, Supreme Court of the Republic of Belarus).



			Additionally, we've carried out research about goodwill of officers in open information sources.
2	Section 1 Clause 4 (Paragraph 3,4 Part 1) 6 Section 3	Requirements to disclosure of the information about the property owner (establishers, shareholders) and beneficial owners	See procedures below
2.1	Section 3 Clause 10	List of beneficial owners	We've requested and studied documents, containing a list of beneficial owners of the Company, and carried out research in open information sources
2.2	Section 3 Clause 10	Requirements to beneficial structure	We've requested and studied documents about corporate (administrative) structure of the Company and its beneficial owners, and carried out research in open information sources
2.3	Section 3 Clause 10 (part 5), Appendix 2	Questionnaires relating to beneficial owners and property owners (establishers, shareholders)	We've requested and studied questionnaires relating to two beneficial owners of the Company. The questionnaires of beneficial owners, documents, disclosing the ownership structure of the Company, and comments of officers, maintaining operation of the Company, collected during the interview, confirm compliance with the information required for disclosure in the questionnaire of the owner, defined by requirements.
3	Section 1 Clause 4	Disclosure by the Company about its operation, as well as disclosure of information, defined in the Regulation (confirmation) by its property owner (establishers, shareholders), beneficial owners	See procedures below



3.1	Appendix Form 1	2,	Questionnaire of beneficial owner applicant	We've carried out research in open information sources about beneficial owners, collected comments from officers, responsible for operation of the Company.
3.2	Appendix Form 2	2,	Questionnaire of property owner (establisher, shareholder) of the Company	We've carried out research in open information sources about the owner of the Company, collected comments from officers, responsible for operation of the Company.
3.3	Section Clause 11	3	Requirements to beneficial owners and property owner or establishers (shareholders) of the Company	We've carried out research in open information sources, interviewed officers, responsible for operation of the Company.
3.4	Section Clause 12	3	Disclosure of information by the Company about its operation, its owners (establishers, shareholders), beneficial owners	We've carried out research in open information sources, corporate registers, interviewed officers, responsible for operation of the Company.
4	Section Clause 4	1	Requirements about lack of evidence concerning exclusion of the Company from the <i>HTP</i> , as well as its property owner (establishers, shareholders), beneficial owner or legal entity, and its property owner (establishers, shareholders), is (was) a beneficial owner of the Company within 3 years before the reference date for the registration as a resident of the <i>HTP</i>	We've received and studied documents about the company ownership structure, comments during the interview with the officers, responsible for its operation, replies on requests to state bodies, the <i>HTP</i> , and carried out research in open information sources and corporate register of the <i>HTP</i> .
5	Section Clause 4	1	Requirements about lack of evidence concerning significant and (or) consistent (two or more times) breach on token in the Company, its property owner (establishers, shareholders), beneficial owner or legal entity,	We've received and studied documents about the company ownership structure, comments during the interview with the officers, responsible for its operation, replies on requests to state bodies, the <i>HTP</i> , and carried out research in open information sources.



		and its property owner (establishers, shareholders) is (was) a beneficial owner of the Company within 3 years before the reference date for the registration as a resident of the <i>HTP</i>	
6	Section 1 Clause 4, Section 4 (Part 14, 15)	Requirements to sufficient experience in running a business for the Company, and (or) its manager, and (or) its beneficial owner, and (or) its property owner.	We've requested and studied employment record book of the Company, carried out research information in open sources, interviewed officers, responsible for operation of the Company.
7	Section 1 Clause 4	Requirement to the capital	We've requested and studied the Charter, financial statements as of December, 31, 2020, a payment order, which confirm compliance of the capital of the Company with the requirements in the Regulation.
8	Section 1 Clause 5, Section 5	Requirements to financial ratios	We've requested financial reports as of December, 31, 2020 in order to calculate financial ratios according to the formulas, indicated in the Regulation; interviewed the officers, responsible for operation of the Company.
9	Section 1 Clause 4 (Paragraph 12 Part 1)	Requirements for existence of a website in the Internet, the Company has a right of its usage or the right to use the correspondent domain name.	We've visited the website of the Company in the Internet ⁴ , received and studied documents, confirming the right of the Company to use the domain name.
10	Section 1 Clause 4	Requirements to local regulations or other documents, and assumption of organizational measures	We've requested and studied local regulations, which were developed and approved in the Company according to the requirements of the Regulation, and we confirmed their

⁴ <http://currency.com/ru>



			existence and validity from 01.01.2020 until 31.12.2020. Moreover, we've interviewed officials, responsible for operation of the Company.
10.1	Section 6 Clause 19	Organization of risk management	We've requested and studied local regulations, which standardize risk management in the Company, job description of the officer, responsible for risk management, reports of this officer on the results of risk monitoring in the Company from 01.01.2020 until 31.12.2020. We've also interviewed the officer.
10.2	Section 6 Clause 20	Organization of internal control to meet the regulations of the <i>HTP</i>	We've requested and studied local regulations, which standardize internal control to maintain the regulations of the <i>HTP</i> in the Company, job description of the officer, responsible for maintenance of the regulations of the <i>HTP</i> , reports of this officer on the results of risk monitoring in the Company from 01.01.2020 until 31.12.2020. We've also interviewed the officer.
10.3	Section 6 Clause 21	Prevention of anti-money laundering and terrorism and proliferation financing	We've requested and studied the rules of internal control regarding AML/CFT, job description of the officer, responsible for AML/CFT, the documents, confirming the right of use of the software (supplied by companies, indicated in the Regulation), which allows to summarize, analyse and assess the risks relating to compliance with the requirements of AML/CFT by the clients. We've interviewed responsible officers.



10.4	Section Clause 22	6	Local regulations, defining conflict of interest management	We've requested and studied local regulations, standardizing conflict of interest management in the Company ⁵ , interviewed the officers, responsible for operation of the Company.
10.5	Section Clause 23	6	Local regulations and policy regarding outsourcing	We've requested and studied local regulations, standardizing requirements relating to outsourcing, interviewed the officers, responsible for operation of the Company.
10.6	Section Clause 25	6	Development of general conditions for sale of tokens	We've requested and studied local regulations, standardizing requirements relating to development of general conditions for sale of tokens ⁶ , interviewed the officers, responsible for operation of the Company.
10.7	Section Clause 26	6	Requirements for user support	We've requested and studied local regulations, standardizing requirements for user support, job description of the officer, responsible for user support; interviewed the manager and the officer, responsible for user support.
10.8	Section Clause 27	6	Requirements for existence of programmed and technical measures to record all user actions	We've requested and studied local regulations with the description of systematic processes of the Company, reports on information security from 01.01.2020 until 31.12.2020; interviewed officers, responsible for operation of the Company.
10.9	Section Clause 28	6	Local regulations for operators of a cryptocurrency platform	We've requested and studied local regulations, standardizing operation of the Company as an operator of cryptocurrency platform (including description of the order of sales of tokens; token listing; definition of the size and the order of fee

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

⁶ https://currency.com/static/Currencycom_general_conditions_for_tokens_alienation_20200513_ru.pdf



			collection from users; prevention, revealing and constraint of cases of dishonest use of insiders information about tokens and price manipulation on tokens; interaction with providers of payment services, separate accounting of cash, electronic money, tokens; provision to the tender the access to the trade system; making transactions other than by trade system); interviewed the officers, responsible for operation of the Company.
10.10	Section Clause 35	9 Organization of information security (cybersecurity)	We've requested and studied job description of the officer, responsible for system administration and information security; conducted an interview.
10.11	Section Clause 36	9 Local regulations on information security (cybersecurity)	We've requested and studied local regulations, standardizing information security (cybersecurity), interviewed the officer, responsible for system administration and information security in the Company.
10.12	Section Clause 37	9 Organization of system management and information security (cybersecurity), authority division	We've requested and studied local regulations, standardizing information security (cybersecurity) and authority division relating to risk treatment between the officer, responsible for risk management, and the officer, responsible for system administration and information security; reports about state of information security from 01.01.2020 until 31.12.2020; interviewed the officer, responsible for system administration and information security in the Company.
10.13	Section Clause 38	9 Local regulations on information protection (including that one regarding users) and tokens, belonging to the applicant	We've requested and studied local regulations, standardizing information and token protection, which belong to the



			applicant; interviewed the officers, responsible for operation of the Company.	
10.14	Section Clause 39	9	Local regulations on continuous work of information system, a plan for effective restoration of information system after its disruption	We've requested and studied local regulations, standardizing continuous work of information system and effective restoration of its normal operation; interviewed the officer, responsible for system administration and information security in the Company.
10.15	Section Clause 40	9	Organization of monitoring of the system of information security (cybersecurity)	We've requested and studied local regulations, standardizing monitoring of information security system (cybersecurity); reports on state of information security from 01.01.2020 until 31.12.2020; interviewed the officer, responsible for system administration and information security in the Company.
10.16	Section Clause 41	9	Organization of information security system testing (cybersecurity)	We've requested and studied local regulations, containing requirements on testing of information security system (cybersecurity), reports on testing results; interviewed the officer, responsible for system administration and information security in the Company.
10.17	Section Clause 42	9	Local regulations on organization of trainings and knowledge assessment of employees in respect of information security (cybersecurity)	We've requested and studied local regulations, standardizing the necessity of trainings and knowledge check of the employees, relating to information security (cybersecurity); documents on trainings and tests from 01.01.2020 until 31.12.2020; interviewed the officers, responsible for operation of the Company.
11	Section Clause 4	1	Existence of information system that could be used to carry out business activity, which has undergone the audit of information system	See procedures below.



LLC Currency Com Bel

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Page

11.1	Section Clause 29	7	Existence of report on the audit of information system	We've requested and studied the last report on technical audit of the information system of 12.11.2018. We've received and studied a monthly report on state of information security in the Company from 01.01.2020 until 31.12.2020, concerning the state of information system; interviewed the officer, responsible for system administration and information security; requested and analysed information about changes in information system of the Company after the last technical audit.
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Management's Compliance Statement of *LLC Currency Com Bel* to requirements of Clause 4 of *Requirement Regulation*, which should be responded by individual applicants for their registration as residents of the *Belarus High Technologies Park*, approved by decision of the Supervisory board of the *Belarus High Technologies Park* (Record n. 08/HC-5np of October, 23, 2018)

As of December, 31, 2020 and for 2020, *LLC Currency Com Bel* (hereinafter referred to as the Company) complied with the requirements of Clause 4 of *Requirement Regulation*, which should be responded by individual applicants for their registration as residents of the *Belarus High Technologies Park*, approved by decision of the Supervisory board of the *Belarus High Technologies Park* (Record N 08/HC-5np of October, 23, 2018) (hereinafter referred to as the Regulation), in particular:

- About individuals determined by the Regulation, who provide operation of the Company and responsible for the requirements of the Regulation;
- About the property owner (establishers, shareholders) and beneficial owners of the Company, who respond to the requirements, determined by the Regulation;
- About personal disclosure and disclosure (confirmation) of information by its property owner (establishers, shareholders), beneficial owner, defined by the Regulation;
- About lack of evidence concerning exclusion from the *High Technologies Park* (hereinafter referred to as the *HTP*) on grounds of Paragraph 4 and (or) 5 of Clause 41 of the Regulation on the *High Technologies Park* relating to the Company during 2020, its property owner (establishers, shareholders), beneficial owner, or legal entity. Its property owner (establishers, shareholders) is (was) a beneficial owner of the Company;
- About the lack of evidence concerning significant and (or) consistent (two or more times) violation on tokens during 2020, relating to the Company, its property owner (establishers, shareholders), beneficial owner, or legal entity. Its property owner (establishers, shareholders) is (was) a beneficial owner of the Company;
- About the sufficient experience to run a business in one or several fields, provided in Clause 15 of the Regulation;
- About the capital of at least 2 million Belorussian Roubles. The cost of net assets of the Company of December, 31, 2020 was not less than that of the capital;
- About financial ratios provided by the Regulation;
- About local regulations, other documents and organizational measures provided by the Regulation;
- About information system, used by carrying out activities and which has undergone the audit of information system according to the Regulation (confirmed by the Report of 12.11.2018 following the audit);
- About the existence of a website in the Internet, the right of the Company to use this website and the corresponding domain name.

Alexandr Shevchenko
Manager
LLC Currency Com Bel

Limited Liability Company Currency Com Bel



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Page

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