

“Kept” Limited Liability Company
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Independent Audit Firm’s Limited Assurance Report on the Statement of Compliance of Dzengi Com CJSC as at 31 December 2022 and during 2022 with the requirements in clause 4 of the *Regulations on Requirements that Certain Applicants Should Comply with to be Registered as Residents of the High-Tech Park* and other acts¹ of the Supervisory Board of High-Tech Park

To the Management of Dzengi Com CJSC

Introduction

According to Contract No. C-BLO-23-00059 dated 15 June 2023 we were engaged by the Management of Dzengi Com CJSC (“the Management”), to report on the Management’s Statement of Compliance of Dzengi Com CJSC (“the Company”) with the requirements specified in clause 4 of the Regulations on Requirements that Certain Applicants Should Comply with to be Registered as Residents of the High-Tech Park (“the HTP”), approved by the decision of the Supervisory Board of the High-Tech Park (Minutes No. 08/NS-5pr dated 23 October 2018; changes and additions: the decision of the Supervisory Board of the High-Tech Park dated 18 August 2022) and other acts¹ of the Supervisory Board of the High-Tech Park requirements (hereinafter “the Regulations and other HTP Supervisory Board acts requirements” or separately “the Regulations requirements” and “other HTP Supervisory Board acts 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 Regulations requirements as at 31 December 2022 and during 2022 is not, in all material respects, fairly stated.

Management's Responsibilities

The Management is responsible for compliance with the Regulations and other HTP Supervisory Board acts requirements and for preparing the attached Statement of Compliance with the Regulations and other HTP Supervisory Board acts requirements that is free from material misstatement and for 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 Regulations and other HTP Supervisory Board acts 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; maintaining adequate records in relation to the Statement of Compliance with the Regulations and other HTP Supervisory Board acts requirements.

¹ For the purposes of this Report, “other acts of the Supervisory Board of the High-Tech Park” mean the Regulations on the requirements for the internal control rules of residents of the High Technologies Park, the Regulations on the activity of a cryptoplatform operator and the Regulations on provision of services related to the creation and placement of digital tokens (tokens) and carrying out of operations on the creation and placement of own digital tokens (tokens) approved by the decision of the Supervisory Board of the High-Tech Park (Minutes No. 08/NS-5pr dated 23 October 2018; changes and additions: the decision of the Supervisory Board of the High-Tech Park dated 18 August 2022).

Our Responsibilities

Our responsibility is to perform procedures to obtain evidence in respect of the Statement of Compliance with the Regulations and other HTP Supervisory Board acts requirements prepared by the Management and to report thereon in the form of a limited assurance conclusion regarding the Management's Statement, based on the evidence obtained.

We conducted our engagement in accordance with National rules of Auditing dated 23.01.2002 No. 8 (with the latest amendments and additions) "Special-purpose audit engagements and other assurance engagements", and 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 Regulations and other HTP Supervisory Board acts requirements is fairly stated.

Our Independence and Quality Management

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 *International Standard on Quality Management 1* which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and the requirements of 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 Regulations and other HTP Supervisory Board acts 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 Regulations and other HTP Supervisory Board acts 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 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 confirmation with respect to the primary information, data, documentation or other source information serving as the basis for the Management's Statement of Compliance with the Regulations and other HTP Supervisory Board acts 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 Regulations, and representations made by the Management in accordance with the Regulations.

We also performed procedures in relation to stated by the Management compliance of business processes with requirements of clause 32 of the Regulations as at 31 December 2022 and during 2022.

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 Regulations and other HTP Supervisory Board acts requirements we used relevant requirements of the *Regulations 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; changes and additions: the decision of the Supervisory Board of the High-Tech Park dated 18 August 2022) and other HTP Supervisory Board acts requirements.

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 2022 and during 2022 with the Regulations (including compliance with the requirements specified in clause 32 of the Regulations and compliance of the business processes of the Company with these requirements) and other HTP Supervisory Board acts requirements is not, in all material respects, fairly stated.

Restriction on Use

We have assessed the attached Management's Statement of Compliance with the Regulations and other HTP Supervisory Board acts 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 Regulations and other HTP Supervisory Board acts 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 Regulations and other HTP Supervisory Board acts 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.

The engagement partner, the first deputy director for audit
Power of attorney No. 11/05/23 dated 10 May 2023



Irina Vereschagina
(Auditor's Qualification
Certificate No. 0000580)

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Kept Limited Liability Company

Member of Self-regulatory organization of audit firms and auditors in the Republic of Belarus Audit Chamber.

Legal address: 49, Ul. Platonova, room 26-7, Minsk, Belarus 220012.

Information on registration: registered by the Minsk City Executive Committee on 10 February 2011, registration number in the Unified State Register of Legal Entities and Individual Entrepreneurs: No. 193639268, registration number of the entry in the register of auditors and audit firms No. 10038.

Minsk, Belarus

05.04. 2023

Independent Audit firm's Limited
Assurance Report received:

05.04. 2023

*Khomchenko German, Director
Dzengi Com CJSC*



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Attachment 1. Attachment to Independent Audit Firm’s Limited Assurance Report on the Statement of Compliance of Dzengi Com CJSC as at 31 December 2022 and during 2022 with the requirements specified in clause 4 of the Regulations on Requirements that Certain Applicants Should Comply with to be Registered as Residents of the High-Tech Park and other acts of the Supervisory Board of the High-Tech Park

Abbreviations used for regulatory acts:

the Regulations Regulations 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 Technologies Park (Minutes No. 08/NS-5pr dated 23 October 2018; changes and additions: the decision of the Supervisory Board of the High-Tech Park dated 4 April 2020; the decision of the Supervisory Board of the High-Tech Park dated 19 November 2020)¹

Other acts of the Supervisory Board of the High-Tech Park:

ICS Regulations Regulations on the Requirements for the Internal Control Rules of Residents of the High Technologies Park (Minutes No. 08/NS-5pr dated 23 October 2018); changes and additions: the decision of the Supervisory Board of the High-Tech Park dated 18 August 2022)²

CPO Rules Regulations on the Activity of a Cryptoplatform Operator (Minutes No. 08/NS-5pr dated 23 October 2018)³

ICO Rules Regulations on Provision of Services related to the Creation and Placement of Digital Tokens (Tokens) and Carrying out of Operations on the Creation and Placement of Own Digital Tokens (Tokens) (Minutes No. 08/NS-5pr dated 23 October 2018)⁴

¹ [Требования к заявителям \(с 19.11.2020\).pdf \(park.by\)](#)

² [Положение о требованиях к ПВК 2022.pdf \(park.by\)](#)

³ [CryptoExchange rus.pdf \(park.by\)](#)

⁴ [ICO-rus.pdf \(park.by\)](#)

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Seq. No.	No. of the Regulations and other HTP Supervisory Board acts requirements	Regulations and other HTP Supervisory Board acts requirements	Description of procedures performed by LLC "Kept" ¹
1	Chapter 1 Clause 4 (Paragraph 2 of Part 1), Chapter 2 of the Regulations	Existence of persons defined in the Regulations who ensure the functioning of the Company and meet the established requirements	We have received and reviewed the Management Statement Ref. regarding compliance with the requirements specified in clause 4 of the Regulations and other HTP Supervisory Board acts requirements. Incl. see procedures below.
1.1	Chapter 2 Clause 5 of the Regulations	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 of the Regulations	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 of the Regulations	Questionnaire completed for the Head 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 ² regarding the matters in the questionnaire and conducted interviews with the Head of the Company.
1.2.2	Appendix 1, Form 2 of the Regulations	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

¹ 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 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.

² 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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			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 of the Regulations	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 of the Regulations	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 of the Regulations	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.
1.2.6	Appendix 1, Form 6 of the Regulations	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 of the Regulations	Qualification requirements for the Company Head	We have requested and reviewed documents related to education and qualifications.
1.4	Chapter 2 Clause 7 of the Regulations	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 7 ¹ of the Regulations	Qualification requirements for the officer responsible for AML/CFT compliance	We have requested and reviewed documents related to education and qualifications.

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1.6	Chapter 2 Clause 8 of the Regulations	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.
1.7	Chapter 2 Clause 9 of the Regulations	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 of the Regulations	Requirements for the disclosure of information about the owner (founders, participants) and the beneficial owners	See procedures below.
2.1	Chapter 3 Clause 10 of the Regulations	List of beneficial owners	We have requested and reviewed documents containing the information regarding the Company's beneficial owner and searched public sources for relevant information.
2.2	Chapter 3 Clause 10 of the Regulations	Requirement to the beneficiary structure	We have requested and reviewed documents on the corporate (organisational) structure of the Company and the beneficial owner and have searched public sources for relevant information.
2.3	Chapter 3 Clause 10 (Part 5), Appendix 2 of the Regulations	Questionnaires completed for the beneficial owners and the property owner (founders, participants)	We have requested and reviewed questionnaire regarding the beneficial owner, management statement. Beneficial owner's questionnaire, 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, 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), supported that the information required to be disclosed in the questionnaire for the owner complies with the established requirements.
3	Chapter 1 Clause 4 of the Regulations	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 Regulations	See procedures below.
3.1	Appendix 2, Form 1 of the Regulations	Questionnaire completed for the applicant's beneficial owners	We have searched public sources for information about the beneficial owners and received comments from officers who ensure the functioning of the Company.

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3.2	Appendix 2, Form 2 of the Regulations	Questionnaire completed for the owners (founders, participants) of the Company	We have searched public sources for information about the Company's owners and received comments from officers who ensure the functioning of the Company.
3.3	Chapter 3 Clause 11 of the Regulations	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 of the Regulations	Disclosure by the Company of information in respect of itself, its owners (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 of the Regulations	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 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 and the HTP's corporate register.
5	Chapter 1 Clause 4 of the Regulations	Requirements to have no cases of deregistration from the HTP's residents of the Company, its owners (founders, participants), beneficial owners, or a legal entities 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 and the HTP's corporate register.
6	Chapter 1 Clause 4, Chapter 4 (Part 14,15) of the Regulations	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 of the Regulations	Requirements for the statutory capital	We have requested and reviewed the Statute, the financial statements as at 31 December 2022 and the payment order, which confirm that the statutory capital of the Company meets

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			the requirements set out in the Regulations. Also, we recalculated the ratio of Company's net assets to statutory capital.
8	Chapter 1 Clause 4, Chapter 5 of the Regulations	Requirements for complying with financial ratios	We have requested the financial statements as at 31 December 2022, on the basis of which we have calculated the financial ratios in accordance with the formulas specified in the Regulations, we have interviewed persons who ensure the functioning of the Company.
9	Chapter 1 Clause 4 (Paragraph 12 of Part 1) of the Regulations	Requirements for the existence of an Internet website which the Company has the right to use, or the existence of the right of the Company to use the domain name	We have visited the Company's website ¹ , obtained and reviewed the documents confirming the Company's rights to use the domain name.
10	Chapter 1 Clause 4 of the Regulations	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 Regulations and confirmed their existence. We have also interviewed persons who ensure the functioning of the Company.
10.1	Chapter 6 Clause 19 of the Regulations	Organisation of risk management process	We have requested and reviewed the LR governing risk management process 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 2022 to 31 December 2022 and conducted an interview with the responsible officer.
10.2	Chapter 3 of the ICS Regulations	Organisation of risk management process related to the money laundering prevention	We have requested and reviewed the LR governing risk management process in the Company and other relevant local documents related to the implementation of the internal control and risk management process, including in terms of preventing money laundering, reports of this officer on results of risk monitoring in the Company for the period from 1 January 2022 to 31 December 2022; the job description of the officer responsible for risk management, and conducted an interview with the responsible officer.
10.3	Chapter 6 Clause 20	Implementation of internal control process over compliance with the HTP regime	We have requested and reviewed the LR regulating the implementation of internal control process 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 2022 to 31 December 2022 and conducted an interview with the responsible officer.

¹ <https://dzengi.com/>

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10.4	Chapter 6 Clause 21	Organization of the process on 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 Regulations) that allows the aggregation, analysis and risk assessment of AML/CFT compliance by customers, reviewed actual use of this software. We conducted interviews with the responsible officers and requested and reviewed client's questionnaires on compliance with defined regulations.
10.5	Chapter 1 of the ICS Regulations	General requirements for the internal control rules of HTP residents in undertaking the activities the types of activities provided for in paragraph 2 of the ICS Regulations	We have requested and reviewed the AML/CFT related internal control Regulations, the contract with the supplier of the relevant software, which allows to perform generalization, analysis and risk assessment in terms of compliance with AML/CFT requirements; policies for the use of hardware and software and changes to it; selected template client contracts, as well as conducted interviews with the responsible officers.
10.6	Chapter 2 of the ICS Regulations	Organization of the internal control system related to the money laundering prevention	We have requested and reviewed the AML/CFT related internal control Regulations, procedures for assigning the final risk of working with the client in order to confirm the organization of the processes of preliminary, current and subsequent controls in accordance with the ICS Regulations requirements; the job description of the officer responsible for AML/CFT compliance for the performance of functional duties provided for in paragraph 9 of the ICS Regulations; other relevant documents related to the money laundering prevention. We also conducted interview with the responsible officer.
10.7	Chapter 4 of the ICS Regulations	Organization of identification, questioning and verification process of customers	We have requested and reviewed the AML/CFT related internal control Regulations and other relevant documents including those related to the processes of questioning, verification and data storage, as well as the customer identification systems used by the Company for their compliance with the requirements of Article 8 of the Law on the Prevention of Legalization the ICS Regulations and the FATF recommendations, reviewed actual use of this software. We also conducted interview with the responsible officer and requested and reviewed client's questionnaires on compliance with defined regulations.
10.8	Chapter 5 of the ICS Regulations	Organization of the process of freezing of funds and (or) suspension of financial operations of persons involved in terrorist activities	We have requested and reviewed the AML/CFT related internal control Regulations related to the process of freezing of funds and (or) suspension of financial operations, other relevant documents: template client contracts, and "white paper" declarations for the purpose of reflecting information in accordance with the rules. We also conducted interview with the

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			responsible officer, requested and reviewed reports of this officer on results of internal control for the period from 1 January 2022 to 31 December 2022.
10.9	Chapter 6 of the ICS Regulations	Organization of the process of Identification of transactions subject to special monitoring	We have requested and reviewed the AML/CFT related internal control Regulations related to the process of Identification of transactions subject to special monitoring. We also conducted interview with the responsible officer, requested and reviewed reports of this officer on results of internal control for the period from 1 January 2022 to 31 December 2022, reviewed the processes on evaluation of financial transactions of clients and the provision of information to the financial monitoring authority body.
10.10	Chapter 6 of the ICS Regulations	Requirements for qualifications, business reputation and organization of the process of training of employees of HTP residents on prevention of money laundering	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 business reputation and conducted interviews with the officer responsible for compliance with the HTP regime.
10.11	Chapter 6 Clause 22 of the Regulations	LR on conflict of interest management process	We have requested and reviewed the LR governing the management of conflicts of interest process in the Company and conducted interviews with those responsible for the functioning of the Company. Also, we have also reviewed independent sources of information regarding business reputation.
10.12	Chapter 6 Clause 23 of the Regulations	LR and policies on outsourcing	We have requested and reviewed contracts with outsourcing companies, the LR governing outsourcing requirements and conducted interviews with those responsible for the functioning of the Company.
10.13	Chapter 6 Clause 25 of the Regulations	Developing the general terms of token trading	We have requested and reviewed the LR governing requirements for developing the general terms of token sale, conducted interviews with those responsible for the functioning of the Company.
10.14	Chapter 6 Clause 26 of the Regulations	User support process 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, demonstration of used instruments for users request control and conducted interviews with the head and the officer responsible for user support.
10.15	Chapter 6 Clause 27 of the Regulations	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 2022 to 31 December 2022 and conducted interviews with those responsible for the functioning of the Company.
10.16	Chapter 6 Clause 28 of the Regulations	LR of the crypto platform operator	We have requested and reviewed LRs governing the Company's activities as a crypto platform operator (including:

Seq. No.	No. of the Regulations and other HTP Supervisory Board acts requirements	Regulations and other HTP Supervisory Board acts requirements	Description of procedures performed by LLC "Kept" ¹
	Chapters 5-7 of the CPO Rules		<ul style="list-style-type: none"> • 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 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), <p>conducted interviews with those responsible for the functioning of the Company.</p>
10.17	Chapter 1 of the CPO Rules	Separate general requirements that determine the procedure for carrying out the operator of the cryptoplatform activities	We have requested and reviewed the LAs that regulate the general requirements for the Company's activities as a cryptoplatform operator, including the requirements for separate accounting and storage of money, the functioning and ensuring the continuous operation of the Company's information systems, other requirements specified in Chapter 1 of the CPO Rules. We have also conducted interview with the officer responsible for information security and system administration.
10.18	Chapter 2 of the CPO Rules	Requirements for ensuring the process of establishing relationships with clients	We have requested and reviewed relevant documents related to customer relationship procedures, template client contracts for the purpose of confirming the existence of mandatory provisions; demonstration of users questionnaires and conducted interviews with responsible officers.
10.19	Chapter 3 of the CPO Rules	Requirements for advertising and ensuring the process of informing customers	We have requested and reviewed the LRs and other relevant documents regarding the fulfilment of the requirements for advertising activities and the procedure for communicating the required information to customers, other requirements established in Chapter 3 of the CPO Rules, including template client contracts. We also interviewed responsible officers and reviewed the Company's website for the presence of information (documents) subject to placement (disclosure).
10.20	Chapter 4 of the CPO Rules	Requirements for ensuring the process of organizing trading in tokens by a cryptoplatform operator	We have requested and reviewed the LRs and other relevant documents related to the fulfilment of the requirements for ensuring the process of organizing trading in tokens, documents related to granting the status of a trading participant in tokens, the procedure for

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Independent Audit Firm's Limited Assurance Report on the Statement of Compliance of Dzengi Com CJSC as at 31 December 2022 and during 2022 with the requirements in clause 4 of the Regulations on Requirements that Certain Applicants Should Comply with to be Registered as Residents of the High-Tech Park and other acts of the Supervisory Board of the High-Tech Park
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Seq. No.	No. of the Regulations and other HTP Supervisory Board acts requirements	Regulations and other HTP Supervisory Board acts requirements	Description of procedures performed by LLC "Kept" ¹
			making transactions, the misuse of insider information, counteracting the manipulation of prices for tokens, and other issues specified in Chapter 4 of the CPO Rules. We also interviewed responsible officers and reviewed Company's website for the presence of information (documents) subject to placement (disclosure).
10.21	Appendix to the CPO Rules	Information (documents) required to be posted (disclosed) by a cryptoplatform operator on his website on the Internet	We have checked the Company's website for the presence of information (documents) subject to placement (disclosure).
10.22	Chapter 8 of the ICO Rules	Requirements for the activities of the HTP Resident involved in creation and placement of own tokens	We have requested "White paper" declarations and reviewed whether information in declarations is reflected in accordance with the rules. We have also conducted interviews with responsible officers to confirm the organization of processes and the operation of the software in accordance with the requirements.
10.23	Chapter 9 Clause 35 of the Regulations	Organization of information security (cybersecurity) process	We have requested and reviewed monthly information security reports for the period from 1 January 2022 to 31 December 2022, the job description of the officer responsible for system administration and information security process and interviewed him.
10.24	Chapter 9 Clause 36 of the Regulations	LR for information security (cybersecurity) process	We have requested and reviewed the LR governing information security (cybersecurity) process and interviewed the official responsible for system administration and information security in the Company.
10.25	Chapter 9 Clause 37 of the Regulations	Organisation of system administration and information security (cybersecurity) process, segregation of duties	We have requested and reviewed monthly information security reports for the period from 1 January 2022 to 31 December 2022, LR governing information security (cybersecurity) and segregation of risk management duties between the officer responsible for risk management and the officer responsible for system administration and information security, information security reports, conducted interviews with the officer responsible for system administration and information security in the Company.
10.26	Chapter 9 Clause 38 of the Regulations	LR on the process of protection of information (including client-related information) and tokens in the possession of the applicant	We have requested and reviewed monthly information security reports for the period from 1 January 2022 to 31 December 2022, LRs governing the protection of information and tokens in the applicant's possession and interviewed those responsible for the functioning of the Company.
10.27	Chapter 9 Clause 39 of the Regulations	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 monthly information security reports for the period from 1 January 2022 to 31 December 2022, 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.

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Independent Audit Firm's Limited Assurance Report on the Statement of Compliance of Dzengi Com CJSC as at 31 December 2022 and during 2022 with the requirements in clause 4 of the Regulations on Requirements that Certain Applicants Should Comply with to be Registered as Residents of the High-Tech Park and other acts of the Supervisory Board of the High-Tech Park
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Seq. No.	No. of the Regulations and other HTP Supervisory Board acts requirements	Regulations and other HTP Supervisory Board acts requirements	Description of procedures performed by LLC "Kept" ¹
10.28	Chapter 9 Clause 40 of the Regulations	Organisation of information security (cybersecurity) system monitoring process	We have requested and reviewed the LR governing information security (cybersecurity) system monitoring, information security reports and conducted an interview with the officer responsible for system administration and information security in the Company.
10.29	Chapter 9 Clause 41 of the Regulations	Organisation of information security (cybersecurity) testing process	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.
10.30	Chapter 9 Clause 42 of the Regulations	LR on the organisation of the process on 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, conducted interviews with those who ensure the functioning of the Company.
11	Chapter 1 Clause 4 of the Regulations	Audited information system	See procedures below.
11.1	Chapter 7 Clause 29 of the Regulations	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 2022 to 31 December 2022, 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 significant changes in the Company's information system, its architecture and compliance with requirements after the date of the latest technical audit.

Management's Statement of Compliance with the requirements specified in clause 4 of the Regulations on Requirements that Certain Applicants Should Comply with to be Registered as Residents of the High-Tech Park and other acts¹ of the Supervisory Board of the High-Tech Park

As at 31 December 2022 and during 2022 Dzengi Com CJSC ("the Company") has complied with the requirements specified in clause 4 of the Regulations on Requirements that Certain Applicants Should Comply with to be Registered as Residents of the High-Tech Park and other acts of the Supervisory Board of the High-Tech Park (hereinafter "the Regulations and other HTP Supervisory Board acts" or separately "the Regulations" and "other HTP Supervisory Board acts"), in particular the requirements to:

- have persons, as specified in the Regulations and other HTP Supervisory Board acts, who ensure the functioning of the Company and comply with the requirements specified in the Regulations and other HTP Supervisory Board acts;
- have owners (founders, participants) and beneficial owners of the Company who comply with the requirements specified in the Regulations;
- disclose in respect of itself, as well as to ensure disclosure (confirmation) by its owners (founders, participants), beneficial owners of the information specified in the Regulations;
- within three years before the reporting date, have no cases of deregistration from residents of the High-Tech Park of the Company, its owners (founders, participants), beneficial owners, or legal entities whose owners (founders, participants) are (were) the beneficial owners of the Company, on the grounds provided for in paragraphs four and (or) five of clause 41 of the Regulation on the HTP;
- within three years before the reporting date, have no cases of material and/or systematic (two or more times) breach of the token related liabilities by the Company, its owners (founders, participants), beneficial owners, or a legal entity whose owners (founders, participants) are (were) the beneficial owners of the Company;
- have sufficient business experience in one or several areas provided for in clause 15 of the Regulations;
- have statutory capital formed in the amount of at least 2 million Belarusian rubles. Company's net assets were not less than the statutory capital as at 31 December 2022;
- comply with the financial ratios specified in the Regulations as at 31 December 2022;

¹ For the purposes of this Statement, "other acts of the Supervisory Board of the High-Tech Park" mean the Regulations on the requirements for the internal control rules of residents of the High Technologies Park, the Regulations on the activity of a cryptoplatform operator and the Regulations on provision of services related to the creation and placement of digital tokens (tokens) and carrying out of operations on the creation and placement of own digital tokens (tokens) approved by the decision of the Supervisory Board of the High-Tech Park (Minutes No. 08/NS-5pr dated October 23, 2018; changes and additions: the decision of the Supervisory Board of the High-Tech Park dated 18 August 2022).

- have local regulations, other documents and implement measures and processes related to risk management, internal control, prevention of money-laundering, conflict of interest management, transfer of processes to outsourcing, user support, recording customer actions, operations on the creation and placement of own digital tokens (tokens), information security and system administration provided for by the Regulations and other HTP Supervisory Board acts, the legislation of the Republic of Belarus and the FATF recommendations as at 31 December 2022;
- have information system used in the Company's activities and audited in accordance with the Regulations and other HTP Supervisory Board acts (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;
- comply with the requirements specified in clause 32 of the Regulations, including compliance of the business processes of the Company with these requirements.

Khomchanka Herman Ruslanovich
Director
Dzengi Com CJSC

5 July, 2023

