

**Paxos Digital Singapore Pte. Ltd.**  
**Examination of Management Assertions**  
**Global Dollar (USDG) Token**  
**November 2024**  
**With Independent Accountant's Report**

**Paxos Digital Singapore Pte. Ltd.**  
**Table of Contents**  
**November 2024**

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Independent Accountant's Report	1-2
Redemption Assets Report	3-5
Notes to the Redemption Assets Report (No Assurance provided by the Independent Accountant on these Notes)	6



## INDEPENDENT ACCOUNTANT'S REPORT

To,  
**The Board of Directors**  
**Paxos Digital Singapore Pte. Ltd.**  
**Purpose of the Report**

We have examined Paxos Digital Singapore Pte. Ltd.'s (the "Company") below assertions. Paxos Digital Singapore Pte. Ltd.'s management is responsible for its assertions. Our responsibility is to express an opinion on management's assertions based on our examination. Management's assertions, which are summarized in the attached report, (hereafter referred to as the "Redemption Assets Report"), which we examined are as follows:

- The Redemption Assets Report refers to the supply of Global Dollar tokens ("USDG") as of 26 November 2024 and 29 November 2024 at 5:00 pm SGT. Such USDG in terms of number of tokens held as denoted under contracts 0xe343167631d89B6Ffc58B88d6b7fB0228795491D on the Ethereum network at 18 decimals at 5:00 pm SGT on the Report Dates and Times is 26,436,864 and 29,386,864, respectively.
- The Redemption Assets Report refers to the accounts held by the Company at regulated financial institutions and in United States government debt instruments. The fair value of the redemption assets is at least equal to or greater than USD 26,436,864 and USD 29,386,864 respectively, at the Report Dates and Times.
- The Redemption Assets Report refers to the Company's holdings as of the Report Dates and Times at 5:00 pm ET, which includes the disclosure of the total fair value of the Company's asset holdings by asset type. Any amounts held in U.S. Government Debt include additional disclosures such as CUSIP and maturity date, as applicable.
- The USDG supply in terms of the number of tokens, as represented by management in the Redemption Assets Report, does not exceed the balance of the Redemption Assets reported below. The percentage value of the reserve assets in excess of the par value of outstanding USDG in circulation is 0.1% and 0.28%, respectively.
- The Redemption Assets Report refers to the redemption asset composition which is substantively compliant with the Monetary Authority of Singapore's (MAS) upcoming stablecoin regulatory framework.

Our examination was conducted in accordance with the Singapore Standard on Assurance Engagements (SSAE) 3000 (Revised), Assurance Engagements other than Audits or Reviews of Historical Financial Information, established by the Institute of Singapore Chartered Accountants ("ISCA"). Those standards require that we plan and perform the examination to obtain reasonable assurance about whether the Redemption Assets in the accompanying Redemption Assets Report is correctly stated, based on the criteria set forth in the Redemption Assets Report, in all material respects. An examination involves performing procedures to obtain evidence about the Redemption Assets Information. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of the Redemption Assets Information, whether due to fraud or error. In making an assessment of the risks of material misstatement, we considered and obtained an understanding of internal controls relevant to the preparation of, and the Redemption Assets Information in, the accompanying Redemption Assets Report in order to design procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of such internal control. Accordingly, no such opinion is expressed. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

Our firm applies Singapore Standards on Quality Management and, accordingly, maintains a comprehensive system of quality control including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements. We have complied with the independence and other ethical requirements of the Accounting and Corporate Regulatory Authority (ACRA) Code of Professional Conduct and Ethics for Public Accountants and Accounting Entities (ACRA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.

The Redemption Assets Information in the accompanying Redemption Assets Report relates to the Company's USDG token, which is a cryptographic stored value token that allows financial market participants to transact in a crypto asset.

Crypto assets are an evolving area of technology and market place activity. Those who choose to acquire and utilize USDG assets should inform themselves of the general risks and uncertainties associated with such assets.

In our opinion, the Redemption Assets Information in the accompanying Redemption Assets Report as of November 2024 is fairly stated, based on the criteria set forth in the Redemption Assets Report, in all material respects.



**ENROME LLP**

Public Accountants and  
Chartered Accountants

Singapore, 27 December 2024

## Paxos Digital Singapore Pte. Ltd. REDEMPTION ASSETS REPORT

### November 2024

Paxos Digital Singapore Pte. Ltd. (the “Company”) is responsible for the completeness, accuracy, and validity of the Redemption Assets Report as of 26 November 2024 and 29 November 2024 at 5:00 pm SGT (the “Report Dates and Times”). The management of the Company asserts that the fair value of the redemption assets held is equal to or greater than USDG in circulation hereby makes the following assertions as of:

Report Dates	26 November 2024	29 November 2024
USDG tokens in circulation	26,436,864	29,386,864
Fair Value of Redemption Assets	\$26,462,167	\$29,467,869
Percentage value of the reserve assets in excess of the par value	0.1%	0.28%

The Company’s total fair value of redemption assets, which are greater than or equal to the supply of USDG, are comprised of the following (Notes 3 and 5):

- 26 November 2024:

Description	CUSIP	Maturity Date	Fair Value (\$)
U.S. Treasury Bills	912797ME4	12/03/2024	\$5,295,325
U.S. Treasury Bills	912797MN4	12/10/2024	\$1,397,521
U.S. Treasury Bills	912797LQ8	12/19/2024	\$2,393,030
<b>Total U.S. Treasury Bills:</b>			<b>\$9,085,876</b>
<b>Total Cash and Cash Equivalents</b>			<b>\$17,376,291</b>
<b>Total of Redemption Assets:</b>			<b>\$26,462,167</b>

- 29 November 2024:

Description	CUSIP	Maturity Date	Fair Value (\$)
U.S. Treasury Bills	912797ME4	12/03/2024	\$5,297,350
U.S. Treasury Bills	912797MN4	12/10/2024	\$1,398,045
U.S. Treasury Bills	912797LQ8	12/19/2024	\$2,393,921
<b>Total U.S. Treasury Bills:</b>			<b>\$9,089,316</b>
<b>Total Cash and Cash Equivalents:</b>			<b>\$20,378,553</b>
<b>Total of Redemption Assets:</b>			<b>\$29,467,869</b>

## **Paxos Digital Singapore Pte. Ltd. REDEMPTION ASSETS REPORT**

**November 2024**

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**NOTES:**

1. The supply of Global Dollar tokens (“USDG”) as denoted under contract 0xe343167631d89B6Ffc58B88d6b7fB0228795491D on the Ethereum network at the Report Dates and Times is 26,436,864 and 29,386,864.
2. The Redemption Assets Report refers to the redemption asset composition which is substantively compliant with the Monetary Authority of Singapore’s (MAS) upcoming stablecoin regulatory framework<sup>1</sup>. The fair value of the redemption assets is at least equal to or greater than USD 26,436,864 and USD 29,386,864 respectively, at the Report Dates and Times.
3. This Redemption Assets Report refers to the Company’s holdings as of the Report Dates and Times at 5:00 pm SGT, which includes the disclosure of the total fair value of the Company’s asset holdings by asset type as reported above. Any amounts held in U.S. Government Securities include additional disclosures such as CUSIP and maturity date, as applicable.
4. The USDG supply does not exceed the balance of the Redemption Assets reported above.

To the best of the knowledge and belief of the undersigned, the information contained in the Redemption Assets Report as of the Report Dates and Times at 5:00pm SGT is accurate and complete.

Signed by:  
  
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Soo Huang Lim  
Executive Director  
**Paxos Digital Singapore Pte. Ltd.**

Date: 27 December 2024

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<sup>1</sup>[https://www.mas.gov.sg/-/media/mas-media-library/publications/consultations/pd/2023/response-to-consultation-on-stablecoins-regulation\\_15aug2023.pdf](https://www.mas.gov.sg/-/media/mas-media-library/publications/consultations/pd/2023/response-to-consultation-on-stablecoins-regulation_15aug2023.pdf)

# **Paxos Digital Singapore Pte. Ltd.**

## **Notes to the Redemption Assets Report**

**November 2024**

**(No Assurance provided by the Independent Accountant on these Notes)**

### **1. BACKGROUND INFORMATION PROVIDED BY PAXOS DIGITAL SINGAPORE PTE LTD**

Paxos Digital Singapore Pte. Ltd. (the "Company") was granted a Major Payment Institution (MPI) license by the Monetary Authority of Singapore ("MAS") to issue stablecoins on 1 July 2024.

The Global Dollar token ("USDG") is a cryptographic token, which allows financial market participants to transact in a crypto asset that has been pegged 1:1 to the U.S. dollar by the Company. The Company maintains the redemption assets securing USDG in approved asset categories per the requirements set by MAS. USDG is deployed on the Ethereum network and is an ERC-20 token, which is built on the Ethereum public blockchain. As such, the number of USDG tokens in circulation is fully and transparently viewable at all times by anyone through any publicly available Ethereum block explorer (e.g. Etherscan).

### **2. DISCUSSIONS RELATED TO CRYPTO ASSETS**

As of the date of this report, crypto assets remain an evolving area of technology and marketplace activity. Those who choose to invest in crypto assets should inform themselves of the general risks and uncertainties associated with such assets.

#### **a. Ownership of Crypto assets:**

Crypto assets are owned anonymously. While the public keys of virtual wallets holding crypto assets reside on the distributed networks and can be viewed publicly, the ownership of the wallets is normally not registered and therefore, anonymous. Ownership of crypto assets is evidenced primarily by the possession of the underlying private key (e.g. passcode). The possessor of the private key controls the corresponding crypto asset wallet.

#### **b. Risk of irreversible transactions:**

Transactions for most crypto assets that occur over the blockchain are generally irreversible, even if such transactions occur fraudulently or accidentally. If a private key is lost or fraudulently used, the crypto assets in the corresponding wallet may not be recoverable.

#### **c. Regulatory uncertainty:**

Legislative and regulatory changes or actions may change or affect the use, transfer, exchange, and value of crypto assets. The effects of any such changes are not determinable as of the date of this report.