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EXECUTIVE SUMMARY:

Objective of the Report:

This report is independently prepared by Moore Blockchain and Digital Assets JHB (Pty) Ltd ("Moore") to perform agreed-upon procedures to report on the reserves held by Luno Group Holdings Limited entities ("Luno"). The objective of this engagement is to report factual findings on the sufficiency of Luno's digital assets to meet its customer liabilities, thereby reporting to Luno, and Luno customers on the findings of the sufficiency of the platform's reserves.

Methodology: Merkle Tree Proof of Reserves

Our procedures utilise the Merkle Tree proof of reserves method, a cryptographic technique used in validating the sufficiency of reserves held by a digital asset platform. It leverages the Merkle Tree structure for efficient and secure aggregation and verification of extensive datasets, presenting a detailed snapshot of the exchange's liabilities and assets at a specified point in time. Additionally, this method empowers customers to independently verify their claims on the platform.

Key Outcomes of the Assessment

- Integrity of Reserves: Our factual findings report confirms that Luno possesses sufficient reserves to cover all
 customer liabilities, as verifiable using the Merkle Tree published by Moore.
- 2. **Data Accuracy:** No discrepancies were identified between the reported figures and the cryptographic verification conducted by Moore.
- 3. Confidentiality: Throughout the process, the confidentiality of individual account details was strictly maintained.

Conclusion

Moore's independent factual findings report concludes that Luno maintains a transparent and secure approach to managing customer assets. The factual findings of the procedures performed demonstrate that Luno holds reserves exceeding 100% of its customer liabilities.

Disclaimer

It is essential to acknowledge that this executive summary is a concise overview of the detailed findings outlined in the full report. The summary aims to be objective, clear, and unambiguous, avoiding any misleading interpretations. However, this summary should not be seen as a substitute for the comprehensive report. The complete agreed-upon procedures report, dated no earlier than the date on which the procedures were completed, and findings determined, provides an exhaustive understanding of the results and methodologies used. This is in accordance with paragraph 32 of the ISRS standards, emphasising the necessity of referring to the full report for a comprehensive understanding of the findings.



Attention: Luno Group Holdings Limited Executive Leadership

AGREED-UPON PROCEDURES REPORT WITH REGARDS TO THE PROOF OF RESERVES PROCEDURES OF VARIOUS LUNO GROUP ENTITIES IN ACCORDANCE WITH ISRS 4400(REVISED).

Purpose of this Agreed-Upon Procedures Report

Moore Blockchain and Digital Assets JHB (Pty) Ltd¹ ("Moore") (together "we" or "engagement team") has been engaged by Luno Group Holdings Limited ("LGHL") to conduct a proof of reserves assessment (the "Assessment") in respect of the Luno group entities set out below, in accordance with the requirements of the Agreed-Upon Reporting Standards ISRS4400 (Revised) (the "Standards").

This report is in respect of the Assessment performed by Moore at 14:00 UTC on 1 October 2024 (the "Snapshot Date").

LGHL engaged Moore for and on behalf of the following LGHL operating entities, which were in-scope for purposes of the Assessment: Luno (Pty) Ltd, Luno Malaysia Sdn Bhd, Luno Australia (Pty) Ltd, PT Luno Indonesia Ltd, Luno Fintech Nigeria Limited, Luno Technology Uganda Limited, and Luno France SASU. (collectively, the "Luno Group Entities"). Each of the Luno Group Entities custodies crypto assets² for and on behalf of its customers (collectively, "Luno Customers").

The Assessment, the outcome of which is set out in this report, was conducted in accordance with specific procedures agreed upon between LGHL (on behalf of each of the Luno Group Entities) and the engagement team ("Agreed-Upon Procedures"). The Assessment has been conducted on an aggregated basis across all Luno Group Entities and not individually per Luno Group Entity.

The Assessment, and this report, specifically excludes any assessments of LGHL's (or any Luno Group Entities') financial health or solvency.

The intended purpose of the Assessment is to demonstrate that, at the time of the performance of the Agreed-Upon Procedures, (i) the Luno Group Entities retained control over the crypto assets held in custody on behalf of their customers (collectively, the "Customers Assets"), and (ii) that these crypto assets are equal to or greater than the corresponding customer liabilities for the Luno Group Entities, as evidenced by Luno's records contained in its customer database (collectively, the "Customer Liabilities").

Our report is in respect of the Assessment as of the Snapshot Date only and is accordingly for the benefit of LGHL and the Luno Group Entities. The report does not extend to any information beyond subject matters on which the Agreed-Upon Procedures are performed and may not be suitable for any other purpose.

Responsibilities of the Engaging Party and the Responsible Party

LGHL has acknowledged that the Agreed-Upon Procedures are appropriate for and meet the intended purpose of the engagement. LGHL is responsible for the subject matter on which the Agreed-Upon Procedures are performed.

Practitioner's Responsibilities

We have conducted the Assessment in accordance with the Standards. We are required to report on the findings, which constitute the factual outcomes derived from executing the Agreed-Upon Procedures. We make no representation regarding the appropriateness of the Agreed-Upon Procedures.

This Assessment is not an assurance engagement. Accordingly, we do not express an opinion nor an assurance conclusion. Had we performed any additional procedures, other matters may have come to our attention that would have been reported on

Professional Ethics and Quality Control

Our firm applies the International Standard on Quality Control (ISQC) 1, Quality Control for Firms that Perform Audits and Reviews of Financial Statements, and Other Assurance and Related Services Engagements, 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.

Note: This report excludes certain crypto assets controlled by LGHL, as they are not connected to Customer Liabilities. Only Customer Assets and Customer Liabilities are relevant to the Assessment, as Luno Group Entities custodies crypto assets on a fully collateralised basis (i.e. a BTC 1 Customer Liability is collateralised by a BTC 1 Customer Asset). (the "Custody Policy")

¹: Moore Blockchain and Digital Assets JHB (Pty) Ltd is a subsidiary within the Moore Johannesburg group structure²: Where this report makes use of the general term "crypto assets", it contemplates the definition assigned to that term in the Financial Advisory and Intermediary Services Act, 2002 (Act 37 of 2002) of South Africa.



PROCEDURES AND FINDINGS

For the purpose of this section of the report, where reference is made to "**LGHL**" or "**Moore**" performing any procedure or other action or providing information or documentation, such reference is to an authorised representative of the relevant Party.

We have performed the Assessment in accordance with the Agreed-Upon Procedures described below, as outlined in the signed Engagement Letter.

THE AGREED-UPON PROCEDURES: The Procedures outlined below are applicable throughout the Engagement:

Phase 1: General

Procedure 1	Findings
Obtain a list and description of	As of the Snapshot Date, Moore obtained a specific list of Products provided to
the LGHL-operated crypto asset	customers by Luno Group Entities. Some of the Products listed below may not be
products ("Products") in-scope	available in certain markets in which the Luno Group Entities operate, as a result
for the Assessment from LGHL.	of the regulatory requirements which apply in those markets.
	Only the Products listed below were included within the scope of the Assessment.
	a) Luno Spot Exchange: The Luno Spot Exchange is a conventional digital
	order book exchange where Luno customers buy and sell crypto assets
	on the exchange platform.
	b) Luno Bundles: Luno's Large Cap Bundle is a product which enables
	customers to purchase a basket of different crypto assets in a single
	transaction. The customer directly owns each of the constituent crypto
	assets forming part of their Bundle purchase.
	c) Luno Staking: Luno's Staking Service enables customers to earn rewards
	by committing their crypto assets to a validator, which in turn validates
	transactions on the relevant blockchain. The process of validating
	transactions generates rewards, which are passed back to customers.
	d) Luno Instant Buy and Sell: This product allows customers to buy or sell
	crypto assets directly from or to Luno.
	e) Luno Trade Desk: The Luno Trade Desk is a bespoke product offering for
	low volume, high value transactions in crypto assets made available to
	certain qualifying Luno customers.

Procedure 2	Findings
Obtain from LGHL a list of	On the Snapshot Date, Moore obtained from LGHL a complete and accurate list
Customer Liabilities and	of (i) the crypto assets held by the Luno Group Entities for and on behalf of the
Customer Assets, which	Luno Customers, and (ii) the Customer Liabilities.
represent the related	
collateralised crypto assets (in	The following crypto assets, constituting all current Customer Assets and
line with the "Custody Policy")	Customer Liabilities, were in scope for the Assessment:
for the Assessment.	a) Aave (AAVE);
	b) Algorand (ALGO);
	c) Cardano (ADA), including Cardano staking;
	d) Avalanche (AVAX);
	e) Cosmos (ATOM);
	f) Bitcoin Cash (BCH);
	g) Polkadot (DOT);
	h) Curve (CRV);
	i) Ethereum (ETH), including Ethereum staking;
	j) Chainlink (LINK);
	k) Litecoin (LTC);
	l) Polygon (MATIC);
	m) Maker (MKR);
	n) Solana (SOL), including Solana staking;
	o) Stellar Lumens (XLM);
	p) Uniswap (UNI);
	q) USD Coin (USDC);
	r) Tether (USDT);
	s) Bitcoin (BTC);
	t) Ripple (XRP);
	u) The Graph (GRT);



v) Synthetix (SNX);
w) TRON (TRX);
x) Fantom (FTM);
y) NEAR (NEAR);
z) The Sandbox (SAND); and
aa) Dogecoin (DOGE).
In accordance with the Custody Policy, the Customer Liabilities and Customer Assets are identical as presented in the list above.

Procedure 3	Findings
Obtain a list of the following accounts, as identified, and provided by LGHL:	Moore observed and inspected LGHL's process for identifying internal corporate crypto asset accounts holding non-customer Assets (which are accordingly excluded from Customer Liabilities) ("Corporate Accounts").
a) LGHL Corporate Accounts	Moore observed the LGHL's engineering team's generation and data extraction of all LGHL's Corporate Accounts and obtained the output files from LGHL. Additionally, Moore ensured the data's accuracy through reconciliation and an independent finance department confirmation. All Corporate Accounts were inspected and cross-checked against the final Customer Liability extract file to confirm their exclusion. No discrepancies were noted.

Phase 2: Proving Client Account Balance Liabilities on Luno's Trading Platform

Procedure 4	Findings
Inspect the tables and scripts	Moore's inquiry with LGHL focused on the accuracy of the Customers Liability
used by LGHL to pull LGHL	extract, a file which contained the complete and accurate list of Customer
Customer balances and data from	Liabilities ("Extract List"), as represented by LGHL. Moore obtained and inspected
the underlying database(s).	an architecture diagram from LGHL. Additionally, LGHL described the data
	management processes relevant to the Extract List and proof of reserves reports,
These tables and scripts are	detailing the database structures, including the queries used for calculating the
designed to pull a complete and	total Customer liabilities on a per crypto asset basis, the code for report
accurate listing of Customer	generation, and Extract List creation while excluding Corporate Accounts. Moore
Liabilities with the Customer	then inspected the scripts used to extract data from the observed input tables to
Assets, as represented by LGHL.	generate the Extract List.
	Moore observed the following key logic used in the script to generate the
	Extract List:
	a) Numerical Formatting: A script to format the output balances to adhere
	to the appropriate numerical formatting for ingestion into the Merkle
	Tree Generator.
	b) Exclude Corporate Accounts: A script to exclude Corporate Accounts.
	c) Filter applied for Product Type: A script to filter for each Product in-
	scope for this Assessment.
	d) User Type: A script to include only user types relevant to this
	Assessment, being Luno Group Entity Customers only.
	e) Apply a Hashed User ID* to Each Record: A script to assign a Hashed
	User ID to each Luno Group Entity Customer record. fier for each customer included in the Proof of Reserves Assessment, in order to

^{*:&}quot; Hashed User ID" is a unique identifier for each customer included in the Proof of Reserves Assessment, in order to maintain user confidentiality and privacy.



Procedure 5	Findings
Observe representatives of LGHL	Moore observed and inspected the interaction by LGHL with the relevant
access the database(s) used to	database(s) for generating the Extract List, including script execution and data
generate Extract List.	summation, to ensure accurate and complete Customer Liabilities data
	representation on the Snapshot Date.
Additionally, observe	
representatives of LGHL	On the Snapshot Date, Moore observed LGHL extract Customer Liabilities data,
execute the scripts from	including Hashed User IDs and account balances, for Customer Liabilities as
Procedure 4 to extract the data	observed within phase 2 (by execution of the tables and scripts from Procedure
from the database(s) and observe	4).
the total balance of Customer	
Liabilities from the executed	Additionally, Moore observed the data's conversion to a CSV file, and its secure
scripts.	upload, and confirmed the record count and asset balances matched those
	observed in the database (via database query).

Procedure 6	Findings
Reconcile the total balance of the	Moore performed a reconciliation process for the Extract List observed in
Customer Liabilities (per the file	Procedure 5. Moore summed the total record count and total asset balances from
received from LGHL) and the total	the Extract List received from LGHL and confirmed the totals reconciled to the
number of records observed in	total record count and total asset balances observed in the database during the
the Extract List to the total	extraction observation with LGHL as outlined in Procedure 5.
balance and the total number of	
records observed in Procedure 5.	No discrepancies were identified.

Procedure 7	Findings
Confirm Corporate Accounts identified in Procedure 3 were not included within the Extract List.	Moore observed an LGHL data engineer generate a list of all Corporate Accounts as noted in Procedure 3. Moore then received two independent lists and a verification confirmation from LGHL's Finance Department. Additionally, Moore reconciled the list of Corporate Accounts generated by LGHL from the identified tables and scripts to the Corporate Accounts list approved by LGHL's Finance Department and performed a full search of all these accounts in the
	Extract List to verify that none of these accounts were in included in the Extract List. No discrepancies were identified.

Phase 3: Utilising the Merkle Tree Generator and Verifier

Procedure 8	Findings
Utilise the Merkle Tree Generator to aggregate Luno Group Entities Customer data from the Extract List and determine the Merkle Root Hash.	Moore utilised a Merkle Tree Generator for Luno Group Entities Customer data aggregation and to determine the Merkle Root Hash. Moore obtained the Extract Report, as observed in Procedure 5, and input this file into the Merkle Tree Generator. Moore observed the generation of the Merkle Tree, which computed the Merkle Root Hash. Moore ensured that the Merkle Tree's outputs, such as record count and asset balances, reconciled with the Extract List.
	Moore confirmed, as per the procedure, the Merkle Root Hash, illustrated below: • f1edfc0ae668ca33b19c7299aa9ea3dbedaa7698ff50fdbb128dddaa67555cc3

Note: To protect Luno Group Entities Customer confidentiality and create a symmetrical Merkle Tree, additional supplemental records were added as "padding" to the raw Extract List during the Merkle Tree generation process in order to protect the total record count from being deduced from the Merkle Tree structure. All supplemental "padding" records had no balances and did not contribute to the total balance of Customer Liabilities.



Procedure 9 Findings Randomly selected sample: Moore used a cryptographic attestation process Randomly select a sample of 1000 Hashed User IDs. involving a sample of genuine Luno Group Entities Customer Hashed User IDs and a sample of fictitious "dummy" User IDs in the Merkle Tree. For each sample, cryptographically test whether the Hashed User IDs Cryptographic Testing of Genuine Hashes: Moore performed Merkle Proof tests are included within the Merkle on the randomly selected sample of 1000 Hashed User IDs, comparing them with Tree. the Merkle Tree's root to confirm their authenticity. Moore utilised the Verifier Tool to cryptographically confirm the Hashed User IDs and the balances were In addition, cryptographically test included within the Merkle Generator Output. Moore input the Hashed User IDs 10 sample 'dummy' accounts to and the relevant balance of Customer Liabilities into the Merkle Verifier and confirm only valid Hashed User confirmed that all 1000 samples were found within the Merkle Tree. IDs are included within the Merkle Tree. Cryptographic Testing of Dummy Hashes: Moore created 10 'dummy' account hashes not in the original dataset and tested them, by inputting these details into the verifier tool, to confirm the Merkle Tree's ability to exclude invalid hashes. All dummy hashes were confirmed not to be found in the Merkle Tree.

Phase 4: Proving Asset Ownership (Excluding staked ETH and staked ADA)

Where the term "ownership" is used in Phase 4 and 5 of this report, it refers to ownership of the custodial accounts in which the Luno Group Entities custody Customer Assets for and on behalf of Luno Customers (collectively "Custodial Accounts").

Ownership rights of the underlying Customer Assets remains at all times with Luno Customers, custody of these assets is fully managed and controlled by LGHL. LGHL maintains the following types of Custodial Accounts:

- 1. Third-Party Custodial Partners; and
- 2. Directly (LGHL) controlled Addresses ("Signature Addresses").

For the purpose of proving asset ownership, the various custodial arrangements have been clearly outlined. This is relevant as the method for proving ownership of the crypto assets differs based on the specific type of custodial arrangement in place.

Ownership Verification:

For ownership verification, Moore obtained evidence dependent on the asset and custodial arrangement, and appropriate procedures that confirm and prove LGHL's ownership rights over the Custodial Accounts.

- a. For any in-kind assets in-scope which are held in Third-Party Custodial Accounts:
 - Inspect and obtain the asset balances, including the appropriate evidence required to execute the procedure).
 - ii. Perform a test transaction: where Moore observed LGHL move a small amount of value from a sample Custodial Account. Moore then inspected the transaction hash on-chain on Moore's own nodes to verify the execution of the instruction provided.
- b. For any in-kind assets in-scope which are held in Signature Addresses, execute one of the following methods:
 - i. Digital Signature: Moore obtained a corresponding digital signature generated by LGHL with a Moore-provided custom message. Subsequently, Moore confirmed each digital signature was signed by the private key associated with a public address on the listing provided by LGHL.
 - ii. Perform a test transaction: Moore provided LGHL with a specific instruction to execute a "send-to-self" transaction. Moore then inspected the transaction hash, as provided by LGHL, on-chain on Moore's own nodes to verify the execution of the instruction provided.

Procedure 10	Findings
Obtain from LGHL a complete list	Moore obtained from LGHL a complete and accurate list of all relevant asset
of all spot accounts and	addresses and accounts representing Customer Assets. For the purposes of
addresses holding related	proving asset ownership, and the method to do so, Moore confirmed with LGHL
Customer Assets for the	the specific type of Custodial Account, and corresponding address, holding each
Assessment.	relevant crypto asset in the provided list.



Procedure 11	Findings
Verify that LGHL has control and ownership of Custodial Accounts, listed in procedure 10.	As part of its Custodial Account infrastructure, Luno engages with Third-party crypto asset custody infrastructure providers (the "Custody Partners")*
instea in procedure 25	Third-Party Custody Partners: At the Snapshot Date, Moore performed a walkthrough observation of representatives of LGHL accessing LGHL's accounts held with the Custody Partners, confirming their credentials, including two-factor authentication. Moore inspected the asset balances displayed and captured these details through time-stamped screenshots for documentation.
	For each Custody Partner workspace: Moore provided LGHL with a specific amount of crypto asset to execute a "send-to-self" transaction. After receiving the transaction hash, Moore inspected the transaction details on the corresponding blockchain, noting the amount, timestamp, and "Sending" addresses matched the specific parameters communicated.
	Signature Addresses: For each in-scope Signature Address, Moore either: a. Obtained a corresponding digital signature generated by LGHL using a custom message provided by Moore. Moore confirmed that each digital signature was signed by the private key associated with a public address on LGHL's listing.
	 Moore provided LGHL with a specific amount of a crypto asset to execute a "send-to-self" transaction. After receiving the transaction hash, Moore inspected the transaction details on the corresponding blockchain, noting the amount, timestamp, and "Sending" addresses matched the specific parameters communicated.
	Moore confirmed no discrepancies in the verification process of the above procedures.
* The names of the Custody Partners	are kent confidential for security reasons

^{*} The names of the Custody Partners are kept confidential for security reasons

Phase 5: Proving Asset Ownership of Staked ETH and Staked ADA

Procedure 12	Findings
Obtain an overview from LGHL	LGHL confirmed that certain of the Luno Group Entities provide staking services
and document the results of	for Cardano (ADA), Ethereum (ETH) and Solana (SOL), as indicated in Procedure 1.
LGHL's staking features for ETH	
ADA and SOL (including the	Moore's procedures revealed that LGHL manages an ADA staking key which
mechanics and associated	staked ADA is delegated to and three withdrawal credentials for staked ETH.
validator and withdrawal key	
pairs).	LGHL confirmed that SOL staking is managed through two staking accounts, each
	delegating to separate validators while maintaining validator key pairs per staked
	account.

Proving ownership for staked Staked ADA: Moore observed LGHL access a Cardano staking key holding staked Cardano (ADA), Ethereum (ETH) ADA. Additionally, Moore queried the ADA staked balances held in with that and Solana (SOL) relevant to staking key custodied within the relevant LGHL Custodial Account type. **Customer Assets (including the** mechanics and associated Staked ETH: Moore inspected LGHL access the relevant account(s) and observed LGHL's three custodied withdrawal credentials related to staked Ether. Moore validator and withdrawal key obtained a list of ETH validators from LGHL. Moore then queried the Ethereum pairs). blockchain and noted all validators distributed to either of the three withdrawal credentials. Moore then summed the total Staked ETH balance for all ETH validators. Staked SOL: Moore inspected LGHL access the relevant account(s) and observed LGHL's custodied accounts that are delegated to specific staking providers. Moore then queried the Solana blockchain and identified all validators associated with these accounts. The total Staked SOL balance across all validators was calculated. All validators were verified as linked to the specified credentials, and the total balances were confirmed directly on the blockchain.

Please note, for privacy and security reasons, LGHL requested that the exact balances not be disclosed.



Phase 5: Proof of Reserves Assessment

Procedure 14	Findings
Query all Customer Assets, per the Custody Policy.	Query Asset Balances: For each Custodial Account, identified by LGHL, as per Phases 4 and 5. Moore performed a query of all of the asset balances at the
	Snapshot Date and compared them to the balances of Customer Assets. Additionally, Moore retrieved from the respective blockchains the balances of all Custodial Accounts tested in the procedures above.
	No discrepancies were noted.

Procedure 15	Findings	
For each Custodial Account, per	Balance Aggregation: Moore calculated the aggregate sum of the balances of all	
phases 4 and 5, perform a sum of	of the Custodial Accounts. This sum represented the total holdings of crypto	
the aggregate crypto asset	assets owned, controlled, and held in custody by the Luno Group Entities at the	
balances (in line with the	Snapshot Date.	
Custodial Arrangements and		
Custody Policy) as at the		
Snapshot Date.		

Procedure 16	Findings		
Compare the aggregate Customer	Based on the data obtained by following the procedures above, Moore performed		
Liabilities from the Extract List	a comparison of the Customer Liabilities, per the Extract List to the sum of all		
obtained in Phase 2 to the sum of	crypto assets held in the Custodial Accounts (per the Custody Policy) in order to		
the balances of each of the	determine the collateralisation ratio for each crypto asset in scope for the		
Custodial Accounts as at the	Assessment (the "Collateralisation Ratio").		
Snapshot Date, as calculated in			
Procedure 15, to calculate the	The Collateralisation Ratio is set out in the table below.		
collateralisation ratio of			
Customer Assets to Customer			
Liabilities. (In line with the			
Custody Policy)			

The Collateralisation Ratio results, as of the Snapshot Date is documented in the table below:

	Collateralisation Ratio	
BTC		103%
BCH		102%
XRP		100%
LTC		102%
ETH		101%
USDC ²		127%
LINK		103%
USDT ²		256%
MATIC		106%
UNI		102%
SOL		103%
ADA		103%
AVAX		105%
DOT		109%
ATOM		107%
CRV		106%
AAVE		115%
MKR		150%
XLM		103%
Algo		139%
GRT		119%
SNX		109%



TRX	126%
FTM	120%
NEAR	117%
SAND	123%
DOGE	106%
ETH Staking	113%
ADA Staking	107%
SOL Staking	104%

^{2:} As per management, Stablecoin collateralization levels align with industry standards.

Yours sincerely,

Moore Blockchain & Digital Assets JHB (Pty) Ltd

MOORE BLOCKCHAIN AND DIGITAL ASSETS JHB (PTY) LTD

Gauteng, South Africa Date: 21 October 2024