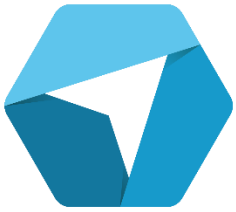

MDIA
Malta Digital Innovation Authority

Systems Auditor Certificate

Recognition Number:	0006
Name:	NBT Technology Ltd
Website:	https://www.nexiabt.com/
Aggregate Certified Expertise:	Auditing in ISO 27001 standard; Security Audits; Cybersecurity reviews; Penetration testing; Information Security; Infrastructure security audits; GUI / Network Agnostics.
DLT Platforms Technologies:	Smart Contract Auditing; Security Smart Contracts assessment; DLT Platforms Auditing; Solidity Code Review; DLT Security Audits; Cryptographic algorithms review; Web / Mobile / Blockchain application security audits; Crypto exchanges; Ethereum.
Date of Issue:	11th March 2020
Date of Expiry:	11th March 2022

Malta Digital Innovation Authority
Fino Buildings,
Level 2, Triq L-Imdina,
Central Business District,
Birkirkara, Malta
CBD 4010
https://mdia.gov.mt/

11th March 2020

NBT Technology Ltd
The Penthouse, Suite 2,
Capital Business Centre, Entrance C,
Triq taz-Zwejt,
San Gwann, SGN 3000
Malta

Tel: +356 21 637 778
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Main Contact Person:
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Tel: +356 77 456 710
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Dear NBT Technology Limited,

Re: Systems Auditor Recognition

The Malta Digital Innovation Authority (MDIA) has approved your application for recognition as a Systems Auditor.

The purpose of this letter is to advise you of the importance that the MDIA attaches to the role of a Systems Auditor and to draw attention to the duties that such role requires. The MDIA requires very high standards of conduct and compliance from all its entities registered in terms of the ITAS Act. This also applies to any person holding a certificate of registration issued by the MDIA to act as a Systems Auditor. Consequently, evidence of bad faith, deceptive acts and behaviour, and incompetence, are all considered to be serious matters. The Authority reserves the right to remove or suspend any Systems Auditor from the registered list in case of unsatisfactory performance or any breach of the obligations related to the Systems Auditor registration with the Authority.

The Systems Auditor and each Subject Matter Expert must be of good conduct, fit and proper. Any skillset notification change by the Systems Auditor or Subject Matter Experts

shall be submitted to the Authority in order to update the recognised expertise of the individual registered with the Authority. A Systems Auditor is required to be covered by a Professional Indemnity Insurance (PII) policy for an amount of not less than €1,000,000. In order to perform audits of Innovative Technology Arrangements the Systems Auditor must have a sound knowledge of the applicable laws; standards; regulations and guidelines relevant to the subject matter.

Once recognised by the Authority, the Systems Auditor shall display the Certificate of Registration as issued by the Authority, on the Systems Auditor's website in line with Article 9(6) of the ITAS Act. Upon appointment by the Auditee, the Systems Auditor is expected to submit a statement informing the Authority of the appointment by the Auditee to act as its Systems Auditor. A second statement confirming that the Systems Auditor and any Subject Matter Experts involved in the Systems Audit are independent must also be submitted.

As a Systems Auditor you are expected to nominate at least two (2) Subject Matter Experts to assist in specific technical fields during the System Audit. Such an appointment is required to be in line with Article 9(7) of the ITAS Act. All Subject Matter Experts must be bound by a contract, with the Authority reserving the right to gain access to and review the mentioned contracts. You are obliged to inform the authority should a Subject Matter Expert included in the Systems Auditor application no longer be available. This must be supplemented by an application to update the Systems Auditor registration. This application, including any applicable fees, must be submitted to the Authority indicating the changes and replacement (if any) of Subject Matter Experts to meet the requisite criteria.

As part of your role as a system auditor, the Systems Auditor is responsible of conducting an audit following the ISAE 3000 standard. The audit must cover all Control Objectives as defined by the Authority. The role of each Subject Matter Expert and the areas of a Systems Audit covered by the Subject Matter Expert must be documented in the Systems Audit Report and the Subject Matter Expert will take responsibility for the work he/she performs. You must ensure the independence of both the Systems Auditor and any appointed subject matter experts from the Auditee. Such independence from the Auditee is required both during the engagement period and during the period covered by the letter of engagement. When applicable, the authority requires that the Systems Auditor confirm the powers and features of intervention by the Technical Administrator, or the Authority, documented within the Blueprint, should an intervention be required.

The MDIA expects that Subject Matter Experts responsible for Security Testing hold a certification in information security assessment or an accreditation in the same area. It is

required that the results of the security testing be reported in a structured form promoted by recognised industry bodies as per the Systems Auditor guidelines.

The MDIA requires that the final Systems Audit Report be signed by the Systems Auditor and by all Subject Matter Experts involved in the Audit as required by the SA guidelines. The Subject Matter Experts must declare the areas that each expert was responsible for and sign for such area. The authority expects that the resulting Audit report include a confirmation that the skills necessary to perform the audit of the particular Innovative Technology Arrangement are available to the Systems Auditor through Subject Matter Experts. Additionally, upon completion of each Systems Audit, the Systems Auditor is also required to collect the 'Systems Audit Report Registration Fee' from the Auditee, and remit this fee to the Authority within thirty (30) days. The Authority reserves the right to carry out quality reviews of registered Systems Auditors and in the process require access to documentation from the Systems Auditor including documentation supporting the Systems Audit process and related quality procedures.

The Systems Auditor is required to establish policies and procedures for the retention of adequate engagement documentation to support the backing of tests and conclusions drawn from the tests performed, for a period of not less than five (5) years from the date of the Systems Audit Report. The authority expects that all auditors and the Subject Matter Experts to keep up to date on the subjects on which they perform Systems Audits with a minimum of 20 hours per annum of continuous professional education (CPE). Records of CPE should be kept and may be required by the Authority for compliance and monitoring of registered Systems Auditors.

The Systems Auditor must stay up-to-date with any guidelines, legal changes and other announcements, which the Authority may publish from time to time.

The Authority remains available to provide any clarifications or information you may require.

MDIA
Malta Digital Innovation Authority