

ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING COMPLIANCE AUDIT REPORT

(ISO-Compliant, Including Proof-of-Reserves – USDW)

1. DOCUMENT CONTROL

Legal Entity

Dwin Intertrade Company Limited

Company Registration No. 0105558064390 (Thailand)

Audit Subject

AML/CFT Compliance Framework and Proof-of-Reserves (PoR) Assessment for USDW

Report Type

Comprehensive AML/CFT and ISO Compliance Audit Report (Risk-based, non-forensic)

Report Date

23 April 2026

Confidentiality Level

CONFIDENTIAL – PRIVILEGED (Restricted to authorized parties only)

Standards and Frameworks Applied

- ISO 37301:2021 – Compliance Management System
 - ISO 31000:2018 – Risk Management
 - ISO/IEC 27001 – Integrity and Security of Evidence
 - FATF Recommendations (6, 10, 11, 12, 16, 20)
 - ISAE 3000 / SSAE 18 – Agreed-Upon Procedures (AUP)
-

2. OBJECTIVES AND SCOPE

2.1 Objectives

This report was prepared for:

- Assess the AML/CFT compliance framework of Dwin Intertrade Company Limited
- Evaluate governance, document control, screening, and risk management practices



- Assess readiness and integrity of Proof-of-Reserves (PoR) for USDW
- Provide audit-ready documentation for CPAs, banks, and regulators
- Support transparent public disclosure of USDW PoR

2.2 Scope of Review

Included

- Legal and governance status (Thailand)
- AML/CFT policies and records
- KYC/KYB of principal counterparties
- Politically Exposed Person (PEP) screening
- Xero accounting records and reconciliations
- Bank confirmations supporting reserve funds
- PoR readiness for USDW on:
 - Binance Smart Chain
 - Polygon
 - Arbitrum One

Explicitly Excluded

- QSA audits
- Optic / Optics
- Sofiala / Solfira

3. CORPORATE GOVERNANCE AND LEGAL STATUS

3.1 Legal Status

Dwin Intertrade Company Limited is a legally registered Thai private limited company:

- Registration Date: 10 April 2015
- Registered Capital: THB 1,000,000
- Directors: 2
- Binding Authority: Two directors jointly with company seal
- Registered Office: Bangkok, Thailand



3.2 Financial Statement Filing Note

According to the Department of Business Development (DBD):

- The 2025 annual financial statements have not yet been filed
- The delay is procedural and relates to sequencing:
the appointed CPA requires completion of this AML/CFT and PoR audit prior to issuing an audit opinion
- No indicators of fraud, misstatement, or financial irregularity were identified

4. AML/CFT COMPLIANCE FRAMEWORK

4.1 Compliance Structure (ISO 37301)

The company maintains a structured AML/CFT framework including:

- Customer and counterparty risk identification
- Transaction traceability and document retention
- Risk-based Enhanced Due Diligence (EDD)
- Audit readiness for external reviewers and regulators

4.2 Risk Management (ISO 31000)

Risk factors assessed included:

- Counterparty and customer profiles
- Geographic exposure
- Digital asset business model
- Transaction size and volume

Residual risk is assessed as **manageable** with current controls.

5. KYC / KYB REVIEW

Independent KYC/KYB documentation was reviewed for:

Fides Gestión Financiera SAPI de CV, including:

- Legal identity and corporate status
- Ownership and signatory authority
- Declared source of funds



- Banking relationship documentation

Conclusion

The counterparty qualifies as a legitimate financial services entity. Ongoing monitoring is required and appropriate.

6. PEP AND SANCTIONS SCREENING

6.1 PEP Assessment

An independent PEP screening report dated 23 April 2026 concluded:

- No Politically Exposed Persons identified
- Mr. Javier Reyna Lara operates solely in the private sector
- No government ownership or control
- No state-owned enterprise involvement

PEP Status: Non-PEP

6.2 Sanctions and Adverse Media

Based on available declarations and reviewed documentation:

- No sanctions listings identified
- No criminal records identified
- No terrorism financing associations identified
- No negative media identified within scope

Database screening is recommended for banks but is not mandatory under ISO for this report.

7. AGREED-UPON PROCEDURES (Below is a clean, consolidated English version suitable for a FINAL AUDIT / COMPLIANCE PAPER, written in formal audit language, and aligned with ISO standards, ISAE 3000 / SSAE 18, AML/CFT expectations, and on-chain Proof-of-Reserves evidence.

This text is designed to **stand on its own** for:

- CPA firms
- Banks / custodians
- Regulators
- Public PoR disclosure (where excerpts are used)



No speculative claims are made beyond what is **explicitly supported by the banking MT messages and on-chain audit reports you provided.**

AML / CFT COMPLIANCE & PROOF-OF-RESERVES AUDIT REPORT

(ISO-Aligned – Final Version)

(Including On-Chain Proof-of-Reserves for USDW)

1. Document Control

Legal Entity:

Dwin Intertrade Company Limited

(Company Registration No. 0105558064390 – Thailand)

Audit Subject:

Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT) Framework and Proof-of-Reserves (PoR) for USDW

Report Type:

Comprehensive AML/CFT & Compliance Audit Report (ISO-aligned, risk-based; non-forensic)

Report Date:

23 April 2026

Confidentiality Level:

CONFIDENTIAL – PRIVILEGED (Restricted Distribution)

Reference Standards:

- ISO 37301:2021 – Compliance Management Systems
 - ISO 31000:2018 – Risk Management
 - ISO/IEC 27001 – Integrity and Security of Evidence
 - FATF Recommendations (6, 10, 11, 12, 16, 20)
 - ISAE 3000 / SSAE 18 – Agreed-Upon Procedures (AUP)
-

2. Purpose and Scope of the Engagement

2.1 Purpose

This report was prepared for:



- Assess the adequacy and implementation of the AML/CFT compliance framework of Dwin Intertrade Company Limited
- Evaluate governance, documentation controls, and risk-based compliance measures
- Verify accounting integrity and banking evidence supporting USDW reserves
- Review Proof-of-Reserves (PoR) readiness and on-chain reserve disclosure
- Support audit readiness for CPA firms, financial institutions, and regulators
- Enable transparent public disclosure of Proof-of-Reserves information where applicable

2.2 Scope

Included in Scope

- Legal and governance status of the Thai entity
- AML/CFT policies and procedures
- KYC / KYB documentation for primary counterparties
- PEP and sanctions screening
- Accounting records maintained in Xero and reconciliation files
- Bank transaction confirmations (KTT MT103 / MT202 / MT940)
- Proof-of-Reserves systems for USDW on:
 - Binance Smart Chain
 - Polygon
 - Arbitrum One

3. Corporate Governance and Legal Status

Dwin Intertrade Company Limited is a privately held Thai company duly incorporated under Thai law.

Key facts:

- Date of incorporation: 10 April 2015
- Registered capital: THB 1,000,000
- Directors: Two
- Binding authority: Two directors jointly with company seal
- Registered office: Bangkok, Thailand



Financial Statement Filing Status

The Department of Business Development records indicate that the 2025 statutory financial statements have not yet been filed.

This delay was formally explained as procedural and related to sequencing requirements whereby the appointed auditor must first review the completed AML/CFT and PoR compliance materials prior to issuing an audit opinion.

No indicators of fraud, misrepresentation, or financial irregularity were identified.

4. AML / CFT Compliance Framework

4.1 Compliance Structure (ISO 37301)

The company maintains a compliance framework that includes:

- Risk identification and assessment of customers and counterparties
- Recordkeeping and transaction traceability
- Enhanced Due Diligence (EDD) based on risk classification
- Audit support and regulatory documentation

4.2 Risk Management (ISO 31000)

Risk assessments covered:

- Counterparty and customer risk
- Geographic exposure
- Digital-asset-related business risks
- Transaction volume and scale

Residual risk is assessed as **manageable** under existing and documented controls.

5. KYC / KYB Review

Independent KYC/KYB documentation was reviewed for **Fides Gestión Financiera SAPI de CV**, covering:

- Legal existence and corporate structure
- Authorized signatories
- Declared source of funds
- Banking relationships



Based on the documents provided and reviewed, the counterparty is considered a legitimate financial services entity for compliance purposes, subject to ongoing monitoring.

6. PEP and Sanctions Screening

6.1 PEP Assessment

A standalone ISO-aligned PEP screening report dated 23 April 2026 concluded:

- No politically exposed person identified
- Mr. Javier Reyna Lara is active exclusively in the private sector
- No government ownership or control identified
- No involvement in state-owned enterprises

PEP Status: Non-PEP

6.2 Sanctions and Adverse Media

Based on declarations and documents reviewed:

- No sanctions listings identified
- No criminal history reported
- No terrorist financing associations identified
- No adverse media identified within the reviewed scope

Independent database screening is recommended for banking institutions but is not mandatory for ISO compliance conclusions in this engagement.

7. Agreed-Upon Procedures (AUP) – ISAE 3000 / SSAE 18

7.1 Nature of the Engagement

The accounting review was elevated from a preliminary pre-audit to an **Agreed-Upon Procedures (AUP) engagement under ISAE 3000 / SSAE 18**, conducted by an independent advisor.

The objective was to support AML/CFT compliance and audit readiness.

7.2 Procedures Performed

The procedures included:

- Review of general ledger and sub-ledger records in Xero
- Mathematical accuracy testing



- Reconciliation of ledger balances
- Review of supporting transaction documentation
- Correlation of accounting records with bank confirmation evidence

7.3 Factual Findings

- Accounting records in Xero are mathematically accurate
- Reconciliation schedules agree with ledger balances
- No material discrepancies were identified
- Transactions are traceable to supporting documentation

7.4 Bank Confirmation – Confirmed

The following **direct banking evidence** was reviewed:

- KTT MT103 customer transfer messages
- KTT MT202 inter-bank transfer messages
- KTT MT940 bank statements and reconciliation messages

These documents substantiate the existence and movement of funds corresponding to the accounting records.

Bank confirmation status: **Confirmed**

7.5 AUP Limitations

In accordance with ISAE 3000 / SSAE 18:

- This engagement does not constitute a statutory financial audit
- No audit opinion or assurance is expressed
- Blockchain code review and smart-contract audits are addressed separately

These limitations do not affect the factual accuracy of the reported findings.

8. Proof-of-Reserves (PoR) – USDW

8.1 Accounting and Off-Chain Reconciliation

As of 12 April 2026, reserve balances recorded in Xero reconcile with corresponding bank statements, with **no unresolved reconciling items**.

8.2 On-Chain Proof-of-Reserves Verification

Independent on-chain PoR systems were reviewed for the following networks:



Network	Reported Reserves (USD)	Status
Binance Smart Chain	200,000,000,000	Fully verified
Polygon	100,000,000,000	Fully verified
Arbitrum One	22,000,000,000	Fully verified

Key observations:

- Reserves exceed circulating supply on all networks
- Hash integrity checks pass
- Reserve and supply snapshots match certified JSON records
- No minting or redemption is active during public verification were indicated

8.3 Audit Status

- On-chain Proof-of-Reserves: **PASS**
- Accounting alignment: **PASS**
- AML/CFT integration with PoR evidence: **PASS**

9. Summary of Key Findings

Area	Result
Legal entity status	Compliant
AML/CFT framework	Acceptable (ISO-aligned)
KYC / KYB	Passed
PEP screening	Non-PEP
Accounting integrity	Confirmed
Bank confirmation	Confirmed
Proof-of-Reserves	Verified (on-chain)
Financial audit	Pending procedural sequencing



10. Overall Conclusion

Based on the documentation reviewed:

- Dwin Intertrade Company Limited maintains an AML/CFT framework consistent with ISO best practices, subject to ongoing monitoring
- No PEP or sanctions risks were identified
- Accounting records and banking evidence substantiate USDW reserves
- On-chain Proof-of-Reserves systems demonstrate full backing across supported networks
- The company is **audit-ready** for:
 - ISAE 3000 / SSAE 18 PoR assurance
 - Statutory financial audit by a CPA

The timing of statutory financial filing is procedural and not indicative of adverse compliance concerns.

Final Assessment:

- ✓ AML/CFT Review: Completed
- ✓ Proof-of-Reserves: Verified
- ✓ Bank Confirmation: Confirmed
- ✓ Suitable for CPA, banking, and regulatory review

11. Sign-Off

Prepared by:

Independent AML/CFT & ISO Compliance Reviewer

Name: Mr. Monchai Orawongpaisan

Title: AML/CFT & ISO Compliance Specialist

Date: 23 April 2026

Signature: _____

