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# Independent Accountants' Examination Report

To the Audit Committee and Management
Paxos Trust Company, National Association:

## Report on Management's Assertion regarding the BUSD Redeemable Tokens and Redemption Assets

*Opinion*

We have examined management of Paxos Trust Company, National Association's (the Company) assertion on page 3 of the BUSD Redemption Assets Report as of September 17, 2026 and September 30, 2026 at 5:00 PM Eastern Time (the BUSD Redemption Assets Report) regarding the total BUSD natively minted tokens and total BUSD redeemable tokens outstanding (Exhibit A), the composition of redemption assets by asset type (Exhibit B), and the comparison of the two (Exhibit C), which includes the criteria used by management of the Company as a basis for the assertion (Management's Assertion).

In our opinion, Management's Assertion is fairly stated, in all material respects.

*Basis for opinion*

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. We are required to be independent and to meet our other ethical requirements in accordance with relevant ethical requirements related to the engagement. We believe that the evidence we have obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

*Other matters*

Management of the Company has referenced to information on websites throughout the BUSD Redemption Assets Report. The information on these websites has not been subjected to our examination procedures, and accordingly we do not express an opinion, conclusion or any other form of assurance on this information.

Management of the Company is responsible for ensuring the Company's terms related to BUSD token purchases and redemptions and the definitions of purchase and redemption rights applicable as of the report dates continue to be available to support an understanding of the BUSD Redemption Assets Report.

Our opinion is not modified in respect of these matters.

*Responsibilities for Management's Assertion*

Management of the Company is responsible for Management's Assertion as well as:

- designing, implementing and maintaining internal control relevant to the preparation of Management's Assertion such that it is free from material misstatement, whether due to fraud or error;
- selecting or developing suitable criteria as a basis for Management's Assertion and appropriately referring to or describing the criteria used; and
- fairly stating Management's Assertion.

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*Our responsibilities*

The attestation standards established by the American Institute of Certified Public Accountants require us to:

- plan and perform the examination to obtain reasonable assurance about whether Management's Assertion is fairly stated, in all material respects; and
- express an opinion on Management's Assertion, based on our examination.

We exercised professional judgment and maintained professional skepticism throughout the engagement. We designed and performed our procedures to obtain evidence about Management's Assertion that is sufficient and appropriate to provide a basis for our opinion. The nature, timing, and extent of the procedures selected depended on our judgment, including an assessment of the risks of material misstatement of Management's Assertion, whether due to fraud or error. We identified and assessed the risks of material misstatement through understanding Management's Assertion and the engagement circumstances. We also obtained an understanding of the internal control relevant to Management's Assertion in order to design procedures that are appropriate in the circumstances but not for the purpose of expressing an opinion on the effectiveness of internal controls.

KPMG LLP

New York, New York
October 23, 2026

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**BUSD Redemption Assets Report as of September 17, 2026 and September 30, 2026 at 5:00 PM Eastern Time**

*Background*[1]

Prior to December 12, 2025, Paxos Trust Company, LLC was a New York limited purpose trust company, and it received its trust charter from the New York Department of Financial Services ("NYDFS") in 2015. It has been a long-time leader in both crypto asset services and the creation of blockchain technologies for the financial world. On December 12, 2025, Paxos Trust Company, LLC converted from a New York limited purpose trust company to a national bank that is limited to the operations of a trust company and activities related thereto (the "Conversion"). As a result of the Conversion, Paxos Trust Company, LLC operates under the title of Paxos Trust Company, National Association (the "Company" or "Paxos") and is subject to the supervision and regulation of the Office of the Comptroller of the Currency ("OCC"). The Company will be subject to the framework imposed by the Guiding and Establishing National Innovation for U.S. Stablecoins Act (the "GENIUS Act") and the rules and regulations promulgated thereunder. To the extent the GENIUS Act does not address topics covered by the guidelines published by the NYDFS in the industry letter dated June 8, 2022[2] ("NYDFS Guidelines"), the Company continues to operate pursuant to policies and procedures developed to comply with the NYDFS Guidelines, subject to any request for modification raised by the OCC.

Management of Paxos is responsible for the completeness, accuracy, and validity of the BUSD Redemption Assets Report as of September 17, 2026 and September 30, 2026 at 5:00 pm Eastern Time (the Report Dates).

*Management's Assertion*

Management of Paxos asserts that as of September 17, 2026 and September 30, 2026 at 5:00 pm Eastern Time (the Report Dates):

- the total BUSD natively minted tokens and total BUSD redeemable tokens outstanding (Exhibit A), the composition of redemption assets by asset type (Exhibit B), and the comparison of the two (Exhibit C), are prepared in accordance with the American Institute of Certified Public Accountants (AICPA) 2025 Criteria for Stablecoin Reporting: Specific to Asset-Backed Fiat Pegged Tokens, Part I Criteria for the Presentation and Disclosure of Redeemable Tokens Outstanding and the Availability of Assets for Redemption (the AICPA Criteria)[3].
- the total redemption assets (Exhibit B)[4] are equal to or greater than total BUSD redeemable tokens outstanding (Exhibit A), as presented in Exhibit C. The criteria we used in making this assertion were that the total redemption assets, which are defined as unencumbered assets held by the Company in segregated accounts on behalf of the BUSD token holders and measured as described in Exhibit B, are equal to or greater than the BUSD redeemable tokens outstanding, which are defined in the AICPA Criteria.

[1] Not subject to the Independent Accountants' Examination Report

[2] https://www.dfs.ny.gov/industry_guidance/industry_letters/il20220608_issuance_stablecoins

[3] https://www.aicpa-cima.com/resources/download/stablecoin-reporting-criteria

[4] Included in total redemption assets are any amounts of accrued but unswept interest held as of the report date. Paxos is entitled to and may withdraw all net returns earned on assets to the extent it exceeds the total outstanding redeemable token supply in accordance with the terms and conditions https://www.paxos.com/terms-and-conditions/stablecoin-terms-conditions

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- The Company has applied the reserve requirements for permitted payment stablecoin issuers under Section 4(a)(1)(A) of the GENIUS Act to redemption assets, as presented in Exhibit B.

*Summary*[1]

The following summarizes the total BUSD redeemable tokens outstanding and total redemption assets as of the Report Dates, which are disclosed in Exhibits A and B.

| **Report Dates** | **September 17, 2026** | **September 30, 2026** |
|---|---|---|
| Total BUSD redeemable tokens outstanding (Exhibit A line d) | 34,415,904 | 34,415,904 |
| Total redemption assets in United States Dollar (Exhibit B) | $34,464,834 | $34,511,296 |

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

Signed by:
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Adam Ackermann, *Head of Treasury and Portfolio Management*
Paxos Trust Company, National Association

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**Exhibit A**: **Total BUSD Natively Minted Tokens and Total BUSD Redeemable Tokens Outstanding**

The following table summarizes the types of BUSD tokens:

| | BUSD Tokens (in quantity of tokens) | Blockchain Ethereum[ii] | |
|---|---|---|---|
| | | **September 17, 2026** | **September 30, 2026** |
| a. | **Total BUSD natively minted tokens** | **34,415,904** | **34,415,904** |
| | | | |
| b. | Less temporary BUSD nonredeemable tokens | N/A | N/A |
| | Temporarily access-restricted | N/A | N/A |
| | Time-locked | N/A | N/A |
| | | | |
| c. | Less permanent BUSD nonredeemable tokens | N/A | N/A |
| | Permanently access-restricted | N/A | N/A |
| | | | |
| | **Total BUSD nonredeemable tokens**[i] | **N/A** | **N/A** |
| | | | |
| d. | **Total BUSD redeemable tokens outstanding** | **34,415,904** | **34,415,904** |
| | | | |
| i | All BUSD tokens are redeemable. There are no temporary or permanent BUSD nonredeemable tokens | | |
| ii | Blockchain Ethereum refers to the smart contract running on Ethereum at 0x4fabb145d64652a948d72533023f6e7a623c7c53 | | |
| **NOTE**: Refer to the Company's terms related to BUSD token purchases and redemptions and the definitions of purchase and redemption rights (including which holders have such rights)[5] | | | |

[5] https://www.paxos.com/terms-and-conditions/general-terms-and-conditions and https://www.paxos.com/terms-and-conditions/stablecoin-terms-conditions

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**Exhibit B: Composition of Redemption Assets by Asset Type**

The following table summarizes redemption assets by asset type in United States Dollar (USD):

| | September 17, 2026 | September 30, 2026 |
|---|---|---|
| Cash | $944,834 | $944,296 |
| Government money market funds, at net asset value | - | - |
| Repurchase agreements, at fair value | $33,520,000 | $33,567,000 |
| Obligations of U.S. Treasury, at fair value | - | - |
| **Total** | **$34,464,834** | **$34,511,296** |

The redemption assets included in this Exhibit B relate to the redemption assets supporting the BUSD redeemable tokens reported in Exhibit A.

The Company maintains the redemption assets securing BUSD in segregated accounts that are unencumbered and held on behalf of BUSD token holders in one or more of the following forms: (i) fiat currency held in Federal Deposit Insurance Corporation (FDIC)-insured bank accounts; (ii) (a) investments (including through overcollateralized overnight reverse repurchase agreements) in debt instruments that are expressly guaranteed by the full faith and credit of the United States Government; and/or (b) money-market funds composed of such debt instruments. Amounts backed by debt instruments that are expressly guaranteed by the full faith and credit of the United States Government are subject to market pricing risk.

1. *Cash*

The Company's cash is held at commercial banks and cash held at a specific bank may at times exceed the FDIC limit of $250,000. As of September 17, 2026 and September 30, 2026, the uninsured FDIC demand deposits at commercial banks totaled $684,161 and $684,161 respectively. The Company has obtained excess deposit insurance, in the amount of $50,000,000, from Paxos Insurance Company Ltd, a captive insurance company for the Company and its affiliates. This excess deposit insurance applies only to deposits held at institutions covered under the applicable policy and does not apply to all uninsured commercial bank balances. The following table summarizes cash by type of account, regulatory agency, and geographic location.

| Type of Account | Regulatory Agency | Geographic Location | September 17, 2026 | September 30, 2026 |
|---|---|---|---|---|
| For the benefit of authorized token holders | Federal Reserve Board | United States | $944,834 | $944,296 |
| **Total** | | | **$944,834** | **$944,296** |

2. *Government Money Market Funds*

Government money market funds hold investments in direct obligations of the Government of the

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United States and reverse repurchase agreements on such obligations. As of September 17, 2026 and September 30, 2026, the Company held no government money market funds.

3. *Repurchase Agreements, at Fair Value*

Repurchase agreements are agreements with selected commercial banks and broker-dealers, under which the Company acquires securities as collateral (debt obligation) subject to an obligation of the counterparty to repurchase and the Company to resell the securities (obligation) at an agreed-upon time and price. The Company, through a custodian or a sub-custodian, receives delivery of the underlying securities collateralizing repurchase agreements. The Company is not permitted to sell or repledge the securities acquired as collateral. Repurchase agreements are exposed to credit and liquidity risk. To manage these risks, the repurchase agreements entered by the Company are overcollateralized such that the fair value of the underlying collateral is greater than the par amount of the repurchase agreement. Since the repurchase agreements mature overnight, the par amount of the repurchase agreement is considered to be equal to fair value as the amount is deemed to be a cash deposit with no risk of change in value as of the end of each day. The following table summarizes the remaining contractual maturity of the agreements by counterparty at fair value:

| **Repurchase Agreements as of September 17, 2026** | | | | | | |
|---|---|---|---|---|---|---|
| **Counterparty** | **Collateral** | **Coupon Rate** | **Purchase Date** | **Maturity Date** | **Par** | **Fair Value** |
| Bank 1 in United States | Obligations of U.S. Treasury | 3.81% | 9/17/2026 | 9/18/2026 | $33,520,000 | $33,520,000 |
| **Total Repurchase Agreements** | | | | | | **$33,520,000** |

| **Repurchase Agreements as of September 30, 2026** | | | | | | |
|---|---|---|---|---|---|---|
| **Counterparty** | **Collateral** | **Coupon Rate** | **Purchase Date** | **Maturity Date** | **Par** | **Fair Value** |
| Bank 1 in United States | Obligations of U.S. Treasury | 3.88% | 9/30/2026 | 10/1/2026 | $33,567,000 | $33,567,000 |
| **Total Repurchase Agreements** | | | | | | **$33,567,000** |

4. *Obligations of U.S. Treasury*

Obligations of U.S. Treasury are held by a qualified custodian. The Company only holds U.S. Treasury bills that are three months or less from their respective maturities. As of September 17, 2026 and September 30, 2026, the Company held no obligations of U.S. Treasury.

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**Exhibit C: Comparison Between the Redemption Assets and the BUSD Redeemable Tokens Outstanding**

The following table summarizes the redemption assets and the BUSD redeemable tokens outstanding:

| | September 17, 2026 | September 30, 2026 |
|---|---|---|
| Redemption assets | $34,464,834 | $34,511,296 |
| | | |
| Less: Amount of BUSD redeemable tokens outstanding[i] | 34,415,904 | 34,415,904 |
| | | |
| Subtotal prior to timing difference | **$48,930** | **$95,392** |
| | | |
| **Timing differences:** | | |
| BUSD tokens purchased but not yet minted | - | - |
| BUSD tokens redeemed but not yet paid | - | - |
| | | |
| Subtotal prior to temporary difference | **$48,930** | **$95,392** |
| | | |
| **Temporary differences:**[ii] | | |
| BUSD access-restricted tokens | N/A | N/A |
| BUSD time-locked tokens | N/A | N/A |
| | | |
| **Surplus (Deficit)**[iii] | **$48,930** | **$95,392** |
| | | |

i The amount of BUSD redeemable tokens outstanding includes requests for purchases and redemptions that have not yet been processed due to timing differences

ii All BUSD tokens are redeemable. There are no temporary or permanent BUSD nonredeemable tokens

iii The Company's terms stipulate that for each BUSD redeemable token outstanding there is $1 of available assets for redemption. This surplus indicates that asset-backing levels are in accordance with the Company's terms[4]

The tokens and redemption assets included in this Exhibit C relate to the BUSD redeemable tokens reported in Exhibit A and redemption assets reported in Exhibit B.

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**Appendix: General considerations related to Crypto Assets**[1]

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.

(1) 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 are 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.

(2) 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.

(3) Regulatory uncertainty. Legislative and regulatory changes or actions at the state or federal level 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.