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Gate.io

19 December 2022



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KEY RISK INDICATORS	YES/NO/NOT APPLICABLE	SCORE
Does the project have a website?	Yes	2/2
Has the whitepaper of the project been published?	Yes	3/3
Has the project been audited?	Yes	3/3
Does the project have a well-defined use case or utility?	Yes	3/3
Has the project been backed by known investors?	Yes	3/5
Does the project have a diversified number of wallet holders?	Yes	5/7
Has the project been listed on any top-tier crypto aggregators?	Yes	4/5
Do the project and its key individuals (developers, executives, partners, advisors) have a discernable public profile?	Yes	8/10
Do the key individuals have a history of developing successful projects in this market?	No	5/10
Have the project and its key individuals been mentioned in the media in connection with illegal business practices or in any negative or controversial context?	Yes	4/10
Are there any evidence that the project and its key individuals have been involved in litigation?	Yes	3/10
Are there any evidence that the project and its key individuals are listed on blacklists?	No	10/10
Are there any evidence that the project and its key individuals have been involved in credit or bankruptcy issues?	No	7/7
Is there a corporate architecture behind the project?	Yes	3/5
Are the companies part of the project registered in transparent jurisdictions?	Yes	3.5/5
Are the key individuals duly registered with the corporate registries?	Yes	3.5/5
OVERALL RISK ASSESSMENT & TOTAL SCORE	LOW TO MODERATE	70/100



EXECUTIVE SUMMARY

Gate.io is a centralized crypto exchange launched in 2013 as Bter.com in China. Founded by Lin Han, Bter.com was originally operated by Jinan MaxCloud Technology Incorporated (China) and Jinan Zhishu Information Technology (China). After China cracked down crypto currency on 4 September 2017, Bter.com shifted abroad and then became Gate.io.

Gate.io is understood to be operated by Gate Technology Incorporated (Cayman) which Mr. Han incorporated on 28 September 2017. You should note that **this Cayman entity was recently struck off on 31 October 2022.**

In terms of global presence, we have identified affiliated companies in Hong Kong (5), Singapore (4), Canada (1), Lithuania (1), Malta (1), the Marshall Islands (1) and the UAE (1). Notably, **Lin Han is sole shareholder of nearly all entities and thus beneficial owner of Gate.io.** Besides, the South Korean venture capital, 5 Capital Blocks, also invested in Gate.io, although the amount was not disclosed to the public.

In terms of management, Lin Han serves as group's Chief Executive Officer (CEO). The other international key managers include Tom Yang (Executive Vice-President) and Dimitri Krylov (Head of Eurasia Operations and Vice-President), both recently joined in July and June 2022 respectively.

As for financial performance, we could not corroborate financial statements of the group's companies, except for an interview in 2021 that Gate.io has been buying back Gate token (or "GT") since September 2020, and its sales revenue was expected to reach USD 100 million in 2021, quoted from Mr. Han.

Furthermore, **Gate.io has obtained different licenses** in Canada – Money Services Business for money transmitting; Hong Kong – Trust or Company Service Provider (TCSP) License for custody service; Lithuania – Virtual Assets Service Provider (VASP) as crypto exchange; Malta – Virtual Financial Assets (VFA) Class 4 License as crypto exchange; the USA – Money Service Business for money transmitting; and the UAE – proprietary trading in crypto commodities and Over-the-Counter (OTC) services.

With regards to reputation, Gate.io and Bter.com are under a **relatively negative light according to Chinese online sources and communities**, whereas other **international media give mixed views in**



general. In 2019, over 200 investors grouped up to claim their loss of CNY 9,735,950 (equivalent to USD 1.4 million) after investing Gate.io's Initial Exchange Offering of a token named CNN. This incident was reported to the Chinese Internet Financial Authority. Furthermore, after the DeFi project "Kimchi" was listed on 2 September 2020, the price plunged and Gate.io controversially increased the circulating amount from 1.3 million to 8.69 million which caused the value to collapse. On 10 September 2020, local media reported with photos and images that **the police raided Gate.io's office for further investigation.** However, we have not seen following legal proceedings in relation to these disputes above.

Notably, **Gate.io and Bter.com have suffered several hacking attacks since 2014**, although Gate.io has promised to fully compensate investors' loss impacted by the attack.

- On 15 August 2014, Bter.com was hacked and lost 50 million of NXT – valued over CNY 10 million (equivalent to USD 1.44 million).
- In February 2015, Bter.com suffered from a huge loss of 7,170 BTC from its cold wallet – valued to USD 320 million.
- In January 2019, Gate.io was hacked again and lost ETC amounted worth of USD 271,500.
- On 22 October 2022, Gate.io's Twitter account was compromised and the hackers tried to phish investors on a fraudulent website to access the private key of their wallets.
- **Crypto sleuths alleged Gate.io for covering up a hacking attack in 2018, from which reportedly USD 234 million was stolen. The accusation further alleged that Bter.com was targeted by North Korean hackers in order to fund Weapon of Mass Destruction programs.** Gate.io officially denied there was any attack in 2018.

As for litigation, we have identified that Lin Han and Bter.com's operating entities were listed, as either defendant or plaintiff, in 19 civil lawsuits in China. Of note, **four individual investors filed separated lawsuits and appeals against Lin Han and Bter.com in relation to the 2015 hacking attack.** The Court ruled against the plaintiffs due to insufficient evidence. The cases were related to business disputes over account balance, transactions, and technical issues of the platform.



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In terms of market reserves, Armanino LLP, an US-based accounting firm, released a Proof of Reserves on 19 October 2022 stating that **Gate.io held in custody bitcoin and ether assets in excess of 100% of BTC and ETH platform liabilities. Gate.io is one of the only five crypto exchanges that have released Proof of Reserve so far.** The other four exchanges are Kraken, Binance, BitMEX, and OKX.

However, investors criticized that Armanino served as the auditor of FTX. After FTX filed bankruptcy, **Armanino was accused of negligence over FTX's financial accounts. The content of the Proof of Reserve was also questioned by investors that, apart from misleading information, the majority of Gate.io's reserve was reportedly Gate Token, instead of other mainstream virtual assets.**

Lin Han and Gate.io do not feature in any international watch list or sanction list. Based on the above elements, Athena Intelligence has assessed Gate.io as an **overall low to moderate risk.**

PROFILE

Gate.io is one of the oldest centralized cryptocurrency exchange platforms. Founded by Lin Han in 2013, its predecessor was Bter.com in China. Followed by China's crackdown on cryptocurrency on 4 September 2017, Bter.com closed down all operations in the country and shifted to a new platform named Gate.io. It is known to be registered in the Cayman Islands, while having presences across America, Asia, Europe and the Middle East.

At the time of writing, Gate.io has listed over 1,500 cryptocurrencies with over 2,700 trading pairs. The daily trading volume is reported to be USD 471,255,862 according to Coingecko.com¹ and USD 857 million, according to CoinMarketCap.² You should note that Gate.io lists "Restricted Locations" where only part of services or no service can be provided, including Bolivia, Canada, mainland China, Crimea region, Cuba, Iran, Malaysia, Malta, North Korea, Singapore, Spain, Sudan, Syria and the USA.³

¹ www.coingecko.com/en/exchanges/gate-io

² <https://coinmarketcap.com/exchanges/gate-io>

³ www.gate.io/zh-tw/user-agreement



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Gate.io completed an initial coin offering for its native token, Gate Token (“GT”), on 17 April 2019, raising USD 64 million. Besides, there is a discernible corporate investor, namely 5 Capital Blocks (South Korea), which also invested, although the amount was not disclosed to the public.⁴

Apart from the crypto exchange business, Gate.io has also operated in different business in the blockchain industry. It launched its own public chain – GateChain, dedicated wallet – Wallet.io, and DeFi focused projects – HipoSwap and HipoDeFi. In order to bring more users into its ecosystem, Gate.io initiated Gate Lab as incubator for start-up project within GateChain, as well as Gate Venture which invests as venture capital.

As for financial performance, Mr. Han, the CEO, mentioned in an interview in 2021 that Gate.io has been buying back Gate token (or “GT”) since September 2020 and its sales revenue was expected to reach USD 100 million in 2021.⁵

Based on our review, Gate.io has obtained business licenses from financial authorities in Canada (as BitHill Capital Corp), Hong Kong, Lithuania, Malta, the UAE and the USA. These licenses entitle Gate.io to operate as virtual asset exchange, to offer custody services, Over-the-Counter trading and money transmitting services.

Gate.io and its smart chain has been audited by Hacken on 10 March 2022, with Benchmark score of 75%.⁶ It also partners with Hacken Proof, who provides “bug bounty services”, offering maximum of USD 5,000 bounty since 19 August 2021. 134 hackers have participated and 19 reports were submitted.⁷

In terms of market reserves, Armanino LLP, a US-based accounting and business consulting firm, released a Proof of Reserves on 19 October 2022 that Gate.io held in custody bitcoin and ether assets in excess of 100% of BTC and ETH platform liabilities.⁸ Gate.io is one of the only 5 crypto exchanges that have released

⁴ <https://chubk.com/gate-token-gt-overview>
<https://cryptogeek.info/fr/exchange-thekey>

⁵ <https://read01.com/Ey2M2nB.html>

⁶ <https://hacken.io/audits/#gate.io>

⁷ <https://hackenproof.com/gate-dot-io/gate-dot-io-exchange>

⁸ <https://proof-of-reserves.trustexplorer.io/clients/gate.io>



Proof of Reserve as of the time writing this report. The other four exchanges are Kraken, Binance, BitMEX, and OKX.⁹

However, Armanino also audited FTX and was accused of negligence after the latter filed bankruptcy recently.¹⁰ Investors also questioned the Proof of Reserve was full of misleading information.¹¹ The major part of Gate.io's reserve was reportedly Gate Token, instead of other mainstream virtual assets.¹²

CORPORATE STRUCTURE

We have identified Gate.io's affiliated companies in the following jurisdictions: Canada (1), Cayman Islands (1), Hong Kong (5), Lithuania (1), Malta (1), Marshall Islands (1), Singapore (4) and the UAE (1). However, we could not verify the affiliate entities in Turkey¹³ and the USA¹⁴, although online sources suggested Gate.io operates in the both countries.

Gate Technology Incorporated – Cayman Islands

NAME	Gate Technology Incorporated (327526)
DATE OF INCORPORATION	28.09.2017 – 31.10.2022 (Struck off)
DIRECTORS/ADMINISTRATORS	Lin Han – Director
SHAREHOLDERS	N/A
ADDRESS	PO Box 2804, Grand Cayman KY1-1112, Cayman Islands ¹⁵

⁹ <https://cer.live>

¹⁰ <https://news.bloombergtax.com/financial-accounting/ftx-collapse-puts-auditors-in-crosshairs-of-clients-regulators>

¹¹ <https://twitter.com/VersusBtc/status/1592479228100243457>

¹² <https://twitter.com/lookonchain/status/1592436887050149889>

¹³ <https://fr.techtribune.net/blockchain/crypto/gate-io-lance-crypto-exchange-gatetr-en-turquie-marquant-une-etape-importante-de-son-expansion-mondiale/508263>

¹⁴ www.forbes.com/digital-assets/exchanges/gateio/?sh=3eb7c3d01f8d

¹⁵ www.cryptunit.com/exchange/gate



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MAIN ACTIVITIES	The Grand Pavillon Commercial Center ¹⁶ , Cardinal Avenue, George Town, Grand Cayman, Cayman Islands ¹⁷
	PO Box 31119 Grand Pavillon, Hibiscus Way, 802 West Bay Road, Grand Cayman, KY1-1205, Cayman Islands ¹⁸
	Reportedly the holding arm of Gate.io

Gate Technology Incorporated was incorporated on 28 September 2017 in the Cayman Islands – not long after China officially cracked down crypto-related business on 4 September 2017. You should note that, it was recently struck off on 31 October 2022. The company was managed by Lin Han, the founder and CEO of Gate.io.

After Gate.io exited China and shifted to global operation, the exchange is known to be held by Gate Technology, as disclosed in the exchange’s website¹⁹ and LinkedIn profile.²⁰ Gate.io has registered as a Money Service Business (“MSB”) with the Financial Crimes Enforcement Network (“FinCEN”) under the US Department of Treasury since 16 May 2020. With license no. 31000167750925, Gate Technology is entitled to operate as “Money transmitter” as a foreign company.

ASIA

Qinbit Limited – Hong Kong

NAME	Qinbit Limited (2479358)
DATE OF INCORPORATION	20.01.2017 – Active
DIRECTORS/ADMINISTRATORS	Lin Han – Director

¹⁶ <https://craft.co/gate-io/locations>

¹⁷ www.linkedin.com/company/gateio/about

¹⁸ www.blockvalue.com/blockchain/2019112184037.html

¹⁹ www.gate.io/zh-tw/help/guide/16609

²⁰ www.linkedin.com/company/gateio/about



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SHAREHOLDERS	Lin Han – 90% Chang Li – 10%
ADDRESS	12F, San Toi Building, 137-139 Connaught Road Central, Hong Kong
MAIN ACTIVITIES	Venture capital

Qinbit Limited was incorporated on 20 January 2017 in Hong Kong. It is managed by Lin Han, who is also majority shareholder with 90% of its shares. The remaining 10% of the shares are held by Chinese national Chang Li.

Reportedly, Chang Li is the founder of One Boat Capital, a venture capital focused on blockchain investments.²¹ He has also served as a consultant for Gate.io.²²

Hipo Asset Management Limited – Hong Kong

NAME	Hipo Asset Management Limited (2984106)
DATE OF INCORPORATION	20.01.2019 – Active
DIRECTORS/ADMINISTRATORS	Lin Han – Director
SHAREHOLDERS	Lin Han – 100%
ADDRESS	Level 12, 1 Peking Road, Tsim Sha Tsui, Hong Kong
MAIN ACTIVITIES	N/A

Hippo Asset Management Limited was incorporated on 20 January 2019 in Hong Kong. The company is managed and owned by Lin Han.

²¹ www.qcc.com/investor/fc944f61438196e05883186f591ee87d.html

²² <https://tw.news.yahoo.com/%E5%9E%82%E7%9B%B4%E5%85%AC%E9%8F%88facts%E5%B0%87%E8%88%87%E5%90%8C%E8%88%9F%E8%B3%87%E6%9C%AC%E5%B1%95%E9%96%8B%E6%88%B0%E7%95%A5%E5%90%88%E4%BD%9C-055000484.html>



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Hipo Defi and Hipo SWAP are the DeFi projects initiated by the Gate.io group in 2021. These two projects offer users and Gate Token stakers a platform that supports decentralized trading across seven public chains including Ethereum, Polygon, Binance Smart Chain and Gate Chain.

Besides, Lin Han also incorporated another asset management company later in Hong Kong named Gate Asset Management Limited, which is also managed and owned by him.

Gate Information Tech Limited – Hong Kong

NAME	Gate Information Tech Limited (3129055)
DATE OF INCORPORATION	21.02.2022 – Active
DIRECTORS/ADMINISTRATORS	Lin Han – Director
SHAREHOLDERS	Lin Han – 100%
ADDRESS	Suite 3408, 34F, Tower 1, The Gateway, Harbour City, Tsim Sha Tsui, Kowloon, Hong Kong
MAIN ACTIVITIES	N/A

Gate Information Tech Limited was incorporated on 21 February 2022 in Hong Kong. It is managed and owned by Lin Han.

Gate Asset Management Limited – Hong Kong

NAME	Gate Asset Management Limited (3136412)
DATE OF INCORPORATION	12.03.2022 – Active
DIRECTORS/ADMINISTRATORS	Lin Han – Director
SHAREHOLDERS	Lin Han – 100%
ADDRESS	Flat RM A, 12F, ZJ300, 300 Lockhart Road, Wanchai, Hong Kong
MAIN ACTIVITIES	Asset management



Gate Asset Management Limited was incorporated on 12 March 2022 in Hong Kong – at the same address as Hippo Financial Services Limited. It is managed and owned by Lin Han.

Hippo Financial Services Limited – Hong Kong

NAME	Hippo Financial Services Limited (3144206)
DATE OF INCORPORATION	18.04.2022 – Active
DIRECTORS/ADMINISTRATORS	Lin Han – Director
SHAREHOLDERS	Lin Han – 100%
ADDRESS	Flat/RM A, 12F, ZJ 300, 300 Lockhart Road, Wanchai, Hong Kong
MAIN ACTIVITIES	Crypto currency and asset custody services

Hippo Financial Services Limited (“Hippo FS”) was incorporated on 18 April 2022 in Hong Kong – at the same address as Gate Asset Management Limited. It is managed and owned by Lin Han.

You should note that Hippo FS was granted the Trust or Company Service Provider (TCSP) License²³ by the Hong Kong Financial Authority on 15 August 2022.²⁴ This license holder can only provide trust or crypto asset custodial services.²⁵ Besides, Hippo FS also plans to localize operations and enhance the security of its service infrastructure and client’s assets.²⁶

Gate Technology Incorporated Pte. Ltd. – Singapore

NAME	Gate Technology Incorporated Pte. Ltd. (201905125M)
DATE OF INCORPORATION	18.02.2019 – Active

²³ www.tcsp.cr.gov.hk/tcspls/search/public-search?k=hippo

²⁴ <https://watcher.guru/news/crypto-exchange-gate-ios-hippo-financial-obtains-a-license-to-operate-in-hong-kong>

²⁵ <https://invezz.com/news/2022/08/16/gate-io-expands-crypto-custody-services-to-hong-kong-with-key-license>

²⁶ <https://e-cryptonews.com/gate-io-group-obtains-tcsp-license-in-hong-kong>



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DIRECTORS/ADMINISTRATORS	Lin Han – Director HongTian Lee – Director Tengfei Wei – Director
SHAREHOLDERS	Lin Han – 100%
ADDRESS	20 Peck Seah Street, #02-00, Singapore
MAIN ACTIVITIES	Information technology Management consultancy services

Gate Technology Incorporated Pte. Ltd. was incorporated on 18 February 2019 in Singapore. It is managed by Lin Han, HongTian Lee and Tengfei Wei. HongTian Lee and Tengfei Wei also serve as CEO and Chief Technology Officer.²⁷ The company is fully owned by Lin Han. It operates in the information technology sector as well as providing management consultancy services.

Gate Technology Incorporated is the main operating office of Gate.io in Singapore. It is a member of Singapore FinTech Association.²⁸ The registered services include platform management, software development and other FinTech technologies.

The company is also applying for Payment Services license in Singapore.²⁹

Gate Global Pte. Ltd. – Singapore

NAME	Gate Global Pte. Ltd. (202125363D)
DATE OF INCORPORATION	21.07.2021 – Active
DIRECTORS/ADMINISTRATORS	Lin Han – Director Zihang Zhu – Director
SHAREHOLDERS	Lin Han – 100%

²⁷ www.linkedin.com/in/tengfei-wei-599538b1

²⁸ <https://directory.singaporefintech.org/directory/listing/gate-technology-incorporated-pte-ltd>

²⁹ www.linkedin.com/in/leehongtian



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ADDRESS	727 Clement West Street 2, #01-280, Singapore
MAIN ACTIVITIES	Development of software and applications

Gate Global Pte. Ltd. was incorporated on 21 July 2021 in Singapore. The company is managed by Chinese national Zihang Zhu and Lin Han, who is also sole shareholder. Gate Global operates in the development of software and application.

You may wish to note that Zihang Zhu has a very low public profile. Furthermore, we did not identify any evidence suggesting that he has been involved in the business operation of Gate.io.

Gate Information Pte. Ltd. – Singapore

NAME	Gate Information Pte. Ltd. 202129513N)
DATE OF INCORPORATION	24.08.2021 – Active
DIRECTORS/ADMINISTRATORS	Lin Han – Director Zihang Zhu – Director
SHAREHOLDERS	Lin Han – 100%
ADDRESS	727 Clement West Street 2, #01-280, Singapore
MAIN ACTIVITIES	Development of software and applications

Gate Information Pte. Ltd. was incorporated on 24 August 2021 in Singapore – at the same address as Gate Global Pte. Ltd. The company is managed by Zihang Zhu and Lin Han, who is also sole shareholder. The company operates in the development of software and applications.

Gate Information has filed trademark application for Gate.io in the USA since April 2022.³⁰ Assigned by the US Patent and Trademark Office, it possesses the right to use Gate.io’s trademark in the following

³⁰ www.docketalarm.com/trademarks/97389937/GATE.IO



activities: Banking; Bill payment services provided via an electronic wallet; Capital investment; Clearing-houses, financial; Currency exchange services; Electronic funds transfer; Financial analysis; Financial clearing houses; Financial consulting; Financial information provided by electronic means; Financial management; Financial research; Financial services, namely, money lending; Financial sponsorship of starting a business; Financing services; Funds investment; Issuing credit cards; Processing of credit card payments; Processing of debit card payments.³¹

Gate Global Holdings Pte. Ltd. – Singapore

NAME	Gate Global Holdings Pte. Ltd. (202211957C)
DATE OF INCORPORATION	07.04.2022 – Active
DIRECTORS/ADMINISTRATORS	Lin Han – Director Zihang Zhu – Director
SHAREHOLDERS	Lin Han – 100%
ADDRESS	727 Clement West Street 2, #01-280, Singapore
MAIN ACTIVITIES	Holding company

Gate Global Holdings Pte. Ltd. was incorporated on 7 April 2022 in Singapore – at the same address as Gate Global Pte. Ltd. and Gate Information Pte. Ltd. The company is managed by Zihang Zhu and Lin Han, who is also sole shareholder. Gate Global Holdings operates in holding activities.

EUROPE

Gate Technology Ltd – Malta

NAME	Gate Technology Ltd (C89337)
DATE OF INCORPORATION	12.11.2018 – Active

³¹ www.legalhoop.com/trademark/detail/97389932/GATE.IO



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DIRECTORS/ADMINISTRATORS	Mark Bamber – Director <u>Formerly:</u> Jonathan Galea – Director (until 17.11.2022) Virgilio Jose Lizardo Tejada – Director (until 06.08.2022)
SHAREHOLDERS	Lin Han – 100%
ADDRESS	The Penthouse, Carolina Court, Giuseppe Cali Street, Ta' Xbiex XBX 1425, Malta
MAIN ACTIVITIES	Crypto exchange

Gate Technology Ltd was incorporated on 12 November 2018 in Malta. It is currently managed by Mark Bamber. However, there is no evidence suggesting that he has involved in the business activity of Gate.io. Gate Technology's sole shareholder is Lin Han. According to our review, this Maltese entity is Gate.io's first corporation in the EU, marking Gate.io's ambition to expand to the European market.

Notably, on 8 March 2022, Gate Technology obtained a Virtual Financial Assets ("VFA")³² Class 4 License in Malta, which entitles the Gate Group to provide custodian services and operate as a virtual assets exchange from Malta.³³

Gate Global UAB – Lithuania

NAME	Gate Global UAB (306068986)
DATE OF INCORPORATION	11.05.2022 – Active
DIRECTORS/ADMINISTRATORS	Lin Han – Director
SHAREHOLDERS	N/A
ADDRESS	Upes g. 23-1, LT-08128 Vilnius, Lithuania
MAIN ACTIVITIES	Cyrpto currency services

³² www.mfsa.mt/our-work/virtual-financial-assets

³³ www.mfsa.mt/financial-services-register



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Gate Global UAB was incorporated on 11 May 2022 in Vilnius, Lithuania. It is managed by Lin Han.

On 7 September 2022, Gate Global UAB was granted a license as a Virtual Assets Service Provider (VASP) by the Lithuanian Regulatory Authority.³⁴ It allows Gate.io to provide crypto exchange services as well as wallet service in the country.

OTHER JURISDICTIONS

Gate MENA DMCC – UAE

NAME	Gate Mena DMCC (DMCC-152477)
DATE OF INCORPORATION	24.12.2018 – Active
DIRECTORS/ADMINISTRATORS	Lin Han – License Manager
SHAREHOLDERS	N/A
ADDRESS	Unit No: AG-PF-201, AG Tower, Plot No: JLT-PH1-I1A, Jumeirah Lakes Towers, Dubai, United Arab Emirates
MAIN ACTIVITIES	Proprietary trading in crypto commodities

Gate Mena DMCC was incorporated on 24 December 2018 in Dubai, UAE. The company is registered to operate in the proprietary trading in crypto commodities. Gate Mena holds license number DMCC-152477 whose expiry date is on 24 December 2023. Lin Han is listed as License Manager.

Gate Mena DMCC manages Gate.io’s Over-the-Counter (“Gate OTC”) services platform, which was launched after the company acquired the license. Gate OTC offers trading services catered to larger traders such as institutions and high-net-worth investors.³⁵

³⁴ <https://financefeeds.com/gate-io-obtains-crypto-services-license-in-lithuania>

³⁵ <https://finance.yahoo.com/news/gate-io-group-starts-offering-024400968.html>



Gate Capital Corp – Canada

NAME	Gate Capital Corp (12815672) <u>Formerly:</u> BitHill Capital Corp (until 30.08.2022)
DATE OF INCORPORATION	10.03.2021 – Active
DIRECTORS/ADMINISTRATORS	Lin Han – Director
SHAREHOLDERS	N/A
ADDRESS	508 - 3621 Highway 7, Markham ON L3R 0G6, Canada
MAIN ACTIVITIES	Financial services in relation to virtual assets.

Gate Capital Corp was incorporated on 10 March 2021 in Canada. It was formerly known as BitHill Capital Corp until 30 August 2022. The company is managed by Lin Han.

Notably, on 13 January 2022, BitHill Capital Corporation was registered as a Money Services Business under Financial Transactions and Reports Analysis Centre of Canada.³⁶ With the license number M22450886, the company is entitled to provide money transferring services in relation to virtual currencies from Canada.

Gate Technology Corp – Marshall Islands

NAME	Gate Technology Corp (106460)
DATE OF INCORPORATION	12.10.2020-20.08.2021 – Inactive
DIRECTORS/ADMINISTRATORS	N/A
SHAREHOLDERS	N/A

³⁶ www10.fintrac-canafe.gc.ca/msb-esm/public/detailed-information/msb-de-tails/7b226d73624f72674e756d626572223a3136363630392c227072696d617279536561726368223a7b226f72674e616d65223a226361706974616c222c22706167654e756d626572223a322c2273656172636854797065223a332c226974656d7350657250616765223a31307d7d/



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ADDRESS	N/A
MAIN ACTIVITIES	Crypto exchange platform operation

Gate Technology Corporation was incorporated on 12 October 2020 in the Marshall Islands, while cancelled shortly within one year. The shareholder and director information are not disclosed to the public.

We have identified an official document of “Privacy Policy” from the gate.io domain, which clearly indicates Gate.io’s website is operated by Gate Technology Incorporated domiciled in the Marshall Islands.³⁷ Nevertheless, we could not corroborate the release date of the document.

Besides, the venture capital arm of Gate.io, Gate Ventures, also stated on its website that the copy right belongs to Gate Technology Corp.³⁸

MANAGEMENT PROFILES

According to our review, Lin Han is listed among all affiliated entities of Gate.io. In addition, we have also identified several management team members at the global level. These include Tom Yang – Executive Vice-President, Dimitri Krylov – Vice-President and Head of EuroAsia, and “Jiu-er” – Chief Product Officer and Partner.

Lin Han (韓林)

Lin Han was born on 27 July 1981. He graduated from the University of Shandong, China, with a Bachelor’s degree in Computer Software Engineering³⁹ and a Master’s degree in Radio Physics. He further obtained doctorship in Optical Physic in Canada. Mr. Han started his own business in high-performance computing

³⁷ www.gate.io/docs/privacy_policy.pdf

³⁸ <https://ventures.gate.io/zh-tw#Ven>

³⁹ <https://coinmarketcap.com/exchanges/gate-io>



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right after his studies. Seeing the rising trend of cryptocurrency, he founded the Bter.com⁴⁰ platform in China in April 2013.⁴¹ In China, the operating entity for Bter.com was MaxCloud Technology Incorporated domiciled in Jinan, Shandong province, of which Weiping Huang was Legal Representative.⁴²

On 4 September 2017, when China cracked down crypto currency business, Bter.com closed down all business operations in China. The group transferred the platform from Bter.com to Gate.io, registered in the Cayman Islands on 28 September 2017, and continues to operate globally until now.

You should note that Lin Han also holds Canadian passport. He has incorporated global entities of Gate.io through his Canadian citizenship.

Tom Yang

Tom Yang has served as Gate.io's Executive Vice-President since 5 July 2022.⁴³ He has over a decade of experience in business development and marketing across Canada, USA and China. Of note, Mr. Yang does not include his current role with Gate.io on his LinkedIn profile.

Before joining Gate.io, he served as Vice-President of Alibaba between 2020 and 2022.⁴⁴ Prior to that, he was employed by WeWork and served as Vice-President of Sales in Greater China and Vice-President of Enterprise go-to-market between 2019 and 2020 in New York, USA. Tom Yang was also Head of Agency in North America at Google between 2014 and 2019.⁴⁵

⁴⁰ “比特兒” in Chinese

⁴¹ <https://read01.com/Ey2M2nB.html>

⁴² www.coinonpro.com/news/toutiao/70315.html

⁴³ <https://ffnews.com/newsarticle/gate-io-hires-former-google-executive-as-evp-to-accelerate-global-expansion>

⁴⁴ <https://bitcoinmagazine.com/culture/gate-tom-yang-bitcoin-interview>

⁴⁵ www.linkedin.com/in/tongyang2012



Dimitri Krylov

Dimitri Krylov has served as Head of Eurasia Operations⁴⁶ and Vice-President of Gate.io since June 2022.⁴⁷ Apart from Lin Han, Mr. Krylov often represents Gate.io in global seminars and exhibitions, including the ADGM Finance Week in Abu Dhabi, UAE⁴⁸ and the Blockchain Week in Busan, Korea.⁴⁹

Before joining Gate.io, he was fundraising consultant for blockchain technology between 2020 and 2022. Prior to his international role, Dimitri Krylov was mainly based in Russia. He was Managing Director at investment company Sistema between 2008 and 2013. Mr. Krylov then founded the packaging company Gemma Graphic between 2013 and 2017. After that, he started to engage in the digital technology sector and served as Chief Digital Officer at publishing company ESKMO from 2017 to 2018. Dimitri Krylov then served as Advisor at REVOZ Blockchain between 2018 and 2019.⁵⁰

Alias: Jiu-er (or “酒儿”)

Gate.io’s Chief Product Officer⁵¹ is a lady known under the alias “Jiu-er” or “酒儿”. She joined Bter.com in 2013 as a Customer Service Operator when it had less than 10 employees.⁵² Jiu-er was then promoted as Operational Manager before she left Bter.com in 2015.

Jiu-er served as Key Account Manager and Chief Marketing Officer for Bank Ledger, another fintech and blockchain technology company based in Shenzhen, China, between 2015 and 2017.⁵³ Later in 2017, she

⁴⁶ www.gate.io/article/28708

⁴⁷ www.linkedin.com/in/dimitrikrylov

⁴⁸ https://twitter.com/gate_io/status/1572878684297793536/photo/3

⁴⁹ www.gate.io/zh-tw/blog_detail/1725/gate.io%E5%8F%97%E9%82%80bwb2022-ceo%E5%85%BC%E5%88%9B%E5%A7%8B%E4%BA%BA%E9%9F%A9%E6%9E%97%E5%8D%9A%E5%A3%AB%E9%A6%96%E6%AC%A1%E5%85%AC%E5%BC%80%E5%85%A8%E7%90%83%E6%88%98%E7%95%A5

⁵⁰ www.linkedin.com/in/dimitrikrylov/details/experience

⁵¹ www.528btc.com/person/3078.html

⁵² www.blockvalue.com/jingyan/201411213644.html

⁵³ <https://36kr.com/p/851587890345856>



joined aelf, an open-source blockchain, based in Beijing, before coming back to support Lin Han with the new Gate.io in 2019.⁵⁴

Jiu-er engaged largely in Gate.io's business strategy, including DeFi projects, opening live streaming sessions to boost user engagement, and Gate Lab, which is an incubator for DeFi projects under Gate.io's Gate Chain.⁵⁵

Since 2020, she has been listed as "Partner" of Gate.io.⁵⁶ Gate.io labelled Jiu-er as a "Partner" in various official posts⁵⁷ and marketing activities between 2020 and 2021. The latest live streaming post was in April 2021.⁵⁸

Apart from the management profiles listed above, we have also identified local management team members including HongTian Lee – Director and CEO of Gate Technology Pte. Ltd. (Singapore), Kevin Yang – Chief Investment Officer of Gate Ventures⁵⁹, Kafkas Sönmez – Country Manager⁶⁰ in Turkey⁶¹, Dion Guillaume – Head of Global Communication⁶², Fuxing Pan – Business Development Manager and Jiye Chen – Commercial Development Manager.

REPUTATION

The public profile of Gate.io has been referenced under a relatively negative light in China, while other international media often reference the platform neutrally. However, we have identified numerous hacking attacks being reported throughout the last years.

During the Bter.com time, the platform encountered two attacks in 2014 and 2015. On 15 August 2014, Bter.com was hacked and lost 50 million of NXT, which valued over CNY 10 million (equivalent to USD 1.44

⁵⁴ <https://news.iresearch.cn/yx/2021/04/371622.shtml>

⁵⁵ <https://zhuanlan.zhihu.com/p/366720130>

⁵⁶ www.qianba.com/news/p-421164.html

⁵⁷ www.gate.io/zh-tw/article/20279

⁵⁸ www.gate.io/zh-tw/article/20354

⁵⁹ www.gate.io/zh-tw/blog_detail/1837

⁶⁰ www.ntv.com.tr/ekonomi/gate-io-turkiye-genel-mudurlugune-kafkas-sonmez-atandi,uE3R_9ejB0uC-6SuUsN4Xg

⁶¹ www.linkedin.com/in/kafkas-sonmez-090680168

⁶² www.ntv.com.tr/ekonomi/gate-io-turkiye-genel-mudurlugune-kafkas-sonmez-atandi,uE3R_9ejB0uC-6SuUsN4Xg



million).⁶³ In the 2015 hacking attack, Bter.com suffered from a huge loss of 7,170 BTC from the cold wallet⁶⁴. According to an interview by TokenInsight, Lin Han stated that the company spent two years to paid out the compensation of the hack.⁶⁵

According to rumors, the deposit account of Bter.com was Lin Han's personal bank account. We confirmed this information as the Chinese Court document also revealed the same. Local media alleged that the company's fund had not been audited by third party or deposited under any Trust.⁶⁶

In January 2019, Gate.io was again hacked and lost ETC amounted worth of USD 271,500. A week after the attack, Gate.io stated that USD 100,000 worth of ETC were returned.⁶⁷

In April 2019, Gate.io initiated its first Initial Exchange Offering listing⁶⁸ with a token named Crypto Neo-value Neutral ("CNNS")⁶⁹, a start-up project which intends to build a blockchain ecosphere to facilitate users to discover, invest in, and exchange information and values of crypto assets. However, CNNS faced a 90% collapse after its listing. Over 200 investors grouped up to claim that they lost CNY 9,735,950 (Equivalent to USD 1.4 million) in total.⁷⁰ This incident was reported to the Chinese Internet Financial Authority.⁷¹ Rumors stated that Lin Han had fled to Canada.⁷²

On 2 September 2020, Gate.io listed a popular DeFi project "Kimchi". After the listing, Kimchi's value plunged and Gate.io controversially increased the circulating amount from 1.3 million to 8.69 million, which caused the price to collapse.⁷³ On 10 September 2020, local media and forum reported that the

⁶³ <https://wenshu.court.gov.cn/website/wenshu/181107ANFZ0BXSK4/index.html?do-cid=kq9U36fE7LrXgNTe1HgMWjzrjzRJIZYM2XTE/5KEqf/lo3zcxGtCuJO3qNaLMqsJplO21xLrIA-LEP7WaneLwNbVPPc2TWSiN1N4XzuHLTuX4EspGyy42O4FN0c2yBrq9>

⁶⁴ www.forbes.com/digital-assets/exchanges/gateio/?sh=2a8321201f8d

⁶⁵ <https://read01.com/Ey2M2nB.html>

⁶⁶ www.weibo.com/6880773215/l8KjEgVF

⁶⁷ www.financemagnates.com/cryptocurrency/news/hacker-allegedly-returns-100000-to-gate-io-following-etc-hack

⁶⁸ <https://gateio.medium.com/gate-io-releases-startup-platform-and-launches-1st-project-with-cnns-9e5853d3912>

⁶⁹ <https://thefintechtimes.com/gate-io-cnns>

⁷⁰ <https://zhuanlan.zhihu.com/p/65006525>

⁷¹ <https://finance.sina.com.cn/blockchain/roll/2019-04-30/doc-ihvhiewr9130591.shtml>

⁷² www.blockvalue.com/blockchain/2019112184037.html

⁷³ <https://new.qq.com/omn/20200914/20200914A0GI4000.html>



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police raided its office for further investigation.⁷⁴ Gate.io made official statement that the team has warned investment risk to investors. During the incident, the system functioned normally. The platform has no responsibility to investors' losses and would not give in the platform's fairness due to any smear campaign.⁷⁵

In May 2022, in spite of the economic downturn, Gate.io invested USD 10 million into Stanhope Financial Group, an Irish-based fintech company operating since October 2021. Stanhope Financial possesses financial licenses from the Bank of Lithuania and the Dubai Financial Services Authority. Its affiliate company SH Digital will soon launch cryptocurrency liquidity and trading services.⁷⁶

Recently on 22 October 2022, Gate.io's Twitter account was taken over by hackers who changed the website url to a fraudulent site. The hackers promoted fake giveaway of 500,000 USDT. When users connect their wallets, the hackers were able to stole some of their assets. Gate.io released a statement indicating that it will fully compensate investors the losses caused by the attack.⁷⁷

Furthermore, in November 2022, crypto sleuth ZachXBT and Austin released reports on Twitter, accusing Gate.io for coverup a hacking attack in 2018, which reportedly cost USD 234 million from the exchange.⁷⁸ In the investigation report, Gate.io's predecessor, Bter.com, was listed as one of the four exchanges targeted by North Korea in order to fund Weapon of Mass Destruction programs.⁷⁹ Gate.io denied the accusation that, according to USA' investigation in 2018, Gate.io did not suffer any loss in serial attacks across crypto platforms in 2018.⁸⁰

KEY RISK INDICATORS IDENTIFIED BY ATHENA INTELLIGENCE	YES/NO/NOT KNOWN
Does the individual and the key companies have any discernible media profile in the general or specialized press?	Yes

⁷⁴ <https://coingeek.com/police-raid-gate-io-over-defi-listing>

⁷⁵ www.theblockbeats.info/news/19568

⁷⁶ www.finyear.com/Gate-io-Leads-10M-Series-A-Funding-for-Stanhope-Financial-Group-to-Fuel-Growth_a47436.html

⁷⁷ <https://cointelegraph.com/news/gate-io-users-at-risk-as-scammers-fake-giveaway-on-hacked-twitter-account>

⁷⁸ <https://twitter.com/zachxbt/status/1592337921922994177>

⁷⁹ <https://twitter.com/1A1zP1/status/1591911772730294272>

⁸⁰ <https://twitter.com/zachxbt/status/1592514349385531394/photo/1>



KEY RISK INDICATORS IDENTIFIED BY ATHENA INTELLIGENCE	YES/NO/NOT KNOWN
Has the individual been mentioned in the media in connection with, illegal business practices (money laundering, corruption, tax evasion, fraud, misappropriation of public property etc.) or in any negative or controversial context?	Yes

LITIGATION

Athena Intelligence has conducted litigation checks on Gate.io and Lin Han to determine whether they have been involved in any civil or criminal lawsuits. We have identified that Lin Han and the legal entity of Bter.com have been involved in civil lawsuits as defendant or plaintiff in China.

Lin Han was listed either as defendant or plaintiff as Legal Representative of the legal entities of Bter.com, namely Jinan MaxCloud Technology Incorporated and Jinan Zhishu Information Technology Incorporated. In total, 19 civil lawsuits were filed between 2017 and 2018.⁸¹ Among them, seven Court cases were in relation to the 2015 hacking attack.⁸² Four individual investors separately filed lawsuits and appeals against Bter.com and Lin Han, alleging the platform was responsible for the attack. The plaintiffs requested Bter.com to payback their loss in Bitcoins and pay extra interest for compensation. The Court determined that the plaintiffs failed to provide sufficient evidence, given the fact that the Chinese government had banned crypto currency trades and the investors should bear their own risks. The Court denied appeals and ruled in favor of Bter.com.

The other lawsuits were business disputes related to account balance, transaction and technical issue of the system.

⁸¹ <https://wenshu.court.gov.cn/website/wenshu/181217BMTKHNT2W0/index.html?pageld=117f3f4b32db62eb9a90a025fe970958&s21=%E9%9F%A9%E6%9E%97>

⁸² <https://wenshu.court.gov.cn/website/wenshu/181217BMTKHNT2W0/index.html?pageld=76231c3a9e58f9d343f04947580266fa&s21=%E9%9F%A9%E6%9E%97>



KEY RISK INDICATORS IDENTIFIED BY ATHENA INTELLIGENCE	YES/NO/NOT KNOWN
Have any of the key directors, principals or beneficial owners been involved in litigation, either as a claimant or plaintiff?	Yes

SANCTIONS & WATCH LISTS

Athena Intelligence carried out a review of approximately 700 global records comprising official anti-money laundering lists, international sanctions, debarment lists and prohibitive lists. Gate.io and Lin Han do not feature on these lists or sanctions.

The consulted lists include, amongst others, the Specially Designated Nationals and Blocked Persons list ("SDN List") and all other sanctions lists administered by OFAC, all US related issued sanctions, also at state level; all UN/WorldBank/IMF Watchlists and Sanctions, all EU, Sanctions, including national states financial ministry sanctions, all LATAM and Asian continent watch lists.

KEY RISK INDICATORS IDENTIFIED BY ATHENA INTELLIGENCE	YES/NO/NOT KNOWN
Has the individual been listed in any international regulatory blacklists?	No
Have any of the key companies been listed on any international regulatory blacklists?	No