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INDEPENDENT ACCOUNTANTS' REPORT

Board of Directors and Management Circle Internet Group, Inc.

We have examined management of Circle Internet Group, Inc.'s ("Circle Group") assertion that the Fair Value of Assets Held in USDC Reserve is equal to or greater than USDC in Circulation in accordance with the criteria defined in the accompanying USDC Reserve Report as of October 13, 2025, and October 31, 2025, at 11:59pm Coordinated Universal Time (the "Report Dates"). Circle Group's management is responsible for its assertion. Our responsibility is to express an opinion on management's assertion based on our examination.

Our examination was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA). Those standards require that we plan and perform the examination to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects. An examination involves performing procedures to obtain evidence about management's assertion. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risks of material misstatement of management's assertion, whether due to fraud or error. We believe that the evidence we obtained is sufficient and appropriate to provide a reasonable basis for our opinion.

We are required to be independent and to meet our other ethical responsibilities in accordance with relevant ethical requirements relating to the engagement.

In our opinion, management's assertion that the Fair Value of Assets Held in USDC Reserve is equal to or greater than USDC in Circulation as of the Report Dates in accordance with the criteria defined in the accompanying USDC Reserve Report is fairly stated, in all material respects.

November 26, 2025

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Management's Assertion

Circle Internet Group, Inc. ("Circle Group") is responsible for the completeness, accuracy and validity of the USDC Reserve Report ("the Report") as of October 13, 2025 and October 31, 2025 at 11:59pm Coordinated Universal Time (the "Report Dates"). USDC is issued and redeemed by Circle Internet Financial, LLC and Circle Internet Financial Europe SAS (together, "Circle"). Circle Group management asserts that the Fair Value of Assets Held in USDC Reserve is equal to or greater than USDC in Circulation at the Report Dates in accordance with the criteria defined in the Report below.

USDC Reserve Report

Report Dates	October 13, 2025	October 31, 2025
USDC in Circulation (as defined in the criteria below)	75,722,097,497	75,812,280,166
Fair Value of Assets Held in USDC Reserve (as defined in the criteria below)	\$ 75,787,781,613	\$ 75,878,386,060

CRITERIA

A. USDC In Circulation is defined as the total USDC supply on USDC Approved Blockchains at the Report Dates (77,433,927,851 and 77,018,291,812, respectively)¹ less (i) Tokens Allowed But Not Issued as reported on USDC Approved Blockchains (1,596,906,500 and 1,090,895,203, respectively) and (ii) Access Denied Tokens as reported on USDC Approved Blockchains (114,923,854 and 115,116,443, respectively, and (iii) Circle Gateway pending burns (0 and 0, respectively).

USDC Approved Blockchains are Algorand, Aptos, Arbitrum One, Avalanche C-Chain, Base, Celo, Codex, Ethereum, Hedera, HyperEVM, Ink, Linea, NEAR, Noble, OP Mainnet, Plume, Polkadot Asset Hub, Polygon PoS, Ripple, Sei, Solana, Sonic, Stellar, Sui, TRON, Unichain, Worldchain, XDC, and ZKsync Era blockchains and are used by Circle to issue and redeem USDC (with the exception of TRON for which only redemptions are supported).

Tokens Allowed But Not Issued are defined as tokens that exist on the Algorand, Hedera, Polkadot Asset Hub, and Solana blockchains and are not currently issued to a USDC Holder. They are required due to the technical implementation of USDC on those blockchains.

Access Denied Tokens are defined as the amount of USDC tokens that are restricted from being accessed by the holder to comply with a law, regulation, or legal order from a duly recognized authorized authority, court of competent jurisdiction, or other governmental authority.

Circle Gateway pending burns are defined as USDC balances held within the Circle Gateway smart contract that are pending finalization on the blockchain.

B. Fair Value of Assets Held in USDC Reserve is defined as the total balance of U.S. dollar denominated assets at the Report Dates in the Circle Reserve Fund and in Segregated Accounts held by Circle with regulated financial institutions on behalf of USDC holders.

The Circle Reserve Fund (the "Fund") is a government money market fund under Rule 2a-7 of the Investment Company Act of 1940, as amended. Circle Internet Financial, LLC owns one hundred percent of the equity interests in the Fund represented by the Fund's Net Asset Value (the "NAV"), held on behalf of USDC holders. The Reserve Report provides details of the fair value of the underlying net assets of the Fund that make up the NAV.

Segregated Accounts are unencumbered accounts held on behalf of USDC holders that are segregated from other accounts of Circle, including general corporate funds.



CIRCLE RESERVE FUND ASSETS AS OF OCTOBER 13, 2025

U.S. TREASURY SECURITIES

912797RC3	10/14/25	1,114,729,000		
912797QF7	10/16/25	384,042,066		
912797RD1	10/21/25	970,653,712		
912797QG5	10/23/25	1,598,395,840		
912797RE9	10/28/25	179,717,434		
912797NA1	10/30/25	2,784,802,956		
912797RM1	11/04/25	119,464,475		
912797QP5	11/06/25	4,179,087,327		
912797RN9	11/12/25	996,762,200		
912797QR1	11/20/25	2,105,588,831		
912797RR0	12/02/25	1,629,186,348		
912797QS9	12/04/25	1,790,006,688		
912797RW9	12/09/25	2,426,526,418		
912797QY6	12/11/25	2,443,449,052		
912797RH2	01/08/26	990,791,590		
TOTAL U.S. TREASURY SECURITIES		23,713,203,937		
U.S. Treasury Repurchase Agreements ³		42,718,000,000		
Cash held in Circle Reserve Fund		999,147,093		
Cash due to/(owed by) Circle Reserve Fund due to timing	g and settlement differences, net ⁴	(1,765,058,870)		
TOTAL CIRCLE RESERVE FUND ASSETS		65,665,292,160		
OTHER USDC RESERVE ASSETS AS OF OCTOBER 13, 2025				
Cash held at regulated financial institutions		9,461,506,159		
Cash due to/(owed by) Circle due to timing and settlement differences, net ⁴		660,983,294		
TOTAL OTHER USDC RESERVE ASSETS		10,122,489,453		
TOTAL USDC RESERVE ASSETS AS OF OCTOBE	R 13, 2025	75,787,781,613		
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CIRCLE RESERVE FUND ASSETS AS OF OCTOBER 31, 2025

U.S. TREASURY SECURITIES

Cusip	Maturity Date	Fair Value (\$) ²
912797QP5	11/06/25	4,188,504,943
912797RN9	11/12/25	999,040,620
912797QR1	11/20/25	1,755,298,766
912797NL7	11/28/25	1,551,289,959
912797RR0	12/02/25	1,454,419,000
912797QS9	12/04/25	3,531,503,476
912797RW9	12/09/25	2,359,018,079
912797QY6	12/11/25	2,549,091,276
912797RX7	12/16/25	1,638,394,901
912797RY5	12/23/25	1,789,030,657
912797NU7	12/26/25	95,337,011
912797RZ2	12/30/25	2,571,516,138
912797RH2	01/08/26	501,509,954
912797RJ8	01/15/26	1,830,401,096
912797PD3	01/22/26	53,717,681
TOTAL U.S. TREASURY SECURITIES		26,868,073,557
U.S. Treasury Repurchase Agreements ³		40,196,000,000
Cash held in Circle Reserve Fund		1,003,490,905
Cash due to/(owed by) Circle Reserve Fund due to timing and settlement differences, net ⁴		(2,001,850,493)
TOTAL CIRCLE RESERVE FUND ASSETS		66,065,713,969
OTHER USDC RESERVE ASSETS AS OF OCTOBER	R 31, 2025	
Cash held at regulated financial institutions		9,747,275,564
Cash due to/(owed by) Circle due to timing and settlemen	nt differences, net ⁴	65,396,527
TOTAL OTHER USDC RESERVE ASSETS		9,812,672,091
TOTAL USDC RESERVE ASSETS AS OF OCTOBER	31, 2025	75,878,386,060

USDC Reserve Report



Notes

- USDC in circulation does not include USDC permanently frozen on deprecated blockchains that were formerly supported by Circle. 993,225 USDC on deprecated blockchains exist on the FLOW blockchain as of the Report Dates.
- 2. Amounts are shown here at their fair value as of the Report Dates. The Circle Reserve Fund in which these securities are owned, reports U.S. Treasury Securities in accordance with Rule 2a-7 under the Investment Company Act of 1940, as amended.
- 3. U.S Treasury Repurchase Agreements within the Circle Reserve Fund involve the overnight lending of cash to global financial institutions which is overcollateralized by U.S. Treasury securities.
- 4. Fund and bank balances have been adjusted for timing and settlement differences, which include: deposits/withdrawals occurring after the bank statement cut-off time (but before the Report Dates), transfers between entities of Circle to facilitate the issuance and redemption of USDC, securities purchased/sold on the last day of the reporting period and settled after the Report Dates, interest receivable or payable, and unrealized gains/losses.

Tamora Schuly

Tamara Schulz

Chief Accounting Officer
Circle Internet Group, Inc.

November 26, 2025