



November 8, 2019

Board of Directors  
Keynes Technology Co. Ltd.  
11/F-1 11 Taizi Road  
Nanshan District, Shenzhen  
Guangdong, China 158000

OTC Markets Group, Inc.  
Issuer Services  
304 Hudson Street, 2nd Floor  
New York, NY 10013

**Re: Letter with respect to adequate current information**

Gentlemen:

I am an attorney licensed to practice law in the state of Nevada and am a U.S. resident. I have not been currently or in the past five years suspended or barred from practicing in any state or jurisdiction, nor have I been charged in a civil or criminal case. I have reviewed the corporations Information and Disclosure Statement, articles, bylaws and other necessary documents. My opinion herein is based solely upon these documents and representations and cannot be relied upon in the event that such documentation is inaccurate or contains misrepresentations.

OTC Markets is entitled to rely on this opinion in determining whether Keynes Technology Co. Ltd. has made adequate current information publicly available within the meaning of Rule 144(c)(2) under the Securities Act of 1933.

I have been retained by the Company for the purpose of rendering this opinion and related matters. I have been retained solely for the purpose of reviewing the current information supplied by Keynes Technology Co. Ltd. I have examined such corporate records and other documents and such questions of law as counsel considered necessary or appropriate for purposes of rendering the opinion. This letter covers Nevada and United States laws. This letter does not rely upon the work of other counsel. I have no interest in the securities of the Company.

I am allowed to practice before the Securities and Exchange Commission and have not been prohibited from practice thereunder. I have relied on information obtained from public officials, officers of the issuer and other sources and believe that all such sources are reliable as to matters of fact.

I have reviewed Keynes Technology Co. Ltd's Disclosures - Fiscal Year Ending 2017 which was submitted on November 8, 2019, Disclosures – Fiscal Year Ending 2018, which was submitted on November 8, 2019, the Financial Statements for both Fiscal Year Ending 2017 and 2018, which was submitted on November 8, 2019, Disclosures – Quarterly ending March 31, 2019, which was submitted November 8, 2019, Financial Statements – Quarterly ending March 31,

2019, which was submitted November 8, 2019, Disclosures – Quarterly ending June 30, 2019, which was filed on November 8, 2019, along with Financial Statements – Quarterly ending June 30, 2019, which was submitted November 8, 2019.

Keynes Technology Co. Ltd financials as filed on OTC Markets were prepared by BQ Consulting, Inc. a CPA. Keynes Technology Co. Ltd is currently a shell company. A shell company is defined by a company, other than an asset-backed issuer, with no or nominal operations and either 1) no or nominal assets; 2) assets consisting of cash and cash equivalents; or 3) assets consisting of any amount of cash and cash equivalents and nominal other assets, as defined by Securities Act Rule 405 and Exchange Act Rule 12b-2. SEC reporting companies designate their shell status in their periodic filings.

Adequate current public information is available concerning the Securities and Keynes Technology Co. Ltd within the meaning of Rule 144(c)(2) under the Securities Act of 1933 (the “Securities Act”). Such information has been posted on the OTC Markets News Service and such information includes all of the information that a broker dealer would be required to obtain from Keynes Technology Co. Ltd to publish a quotation for the Securities under Rule 15c2-11 under the Securities Exchange Act of 1934, and complies as to form with the OTC Markets Guidelines for Providing Adequate Current Information and has been posted in the OTC Markets News Service.

Keynes Technology Co. Ltd ’s transfer agent is Nevada Agency and Transfer Company, 50 W Liberty St Ste 880, Reno, NV 89501, phone number 775-322-0626. Nevada Agency and Transfer Company is currently registered under the Exchange Act and is an SEC approved transfer agent. I reviewed a certified shareholder list provided by Nevada Agency and Transfer Company to confirm the number of outstanding shares as set forth in the information.

I have personally met with and spoken to management of Keynes Technology Co. Ltd and its directors. Ruei-Peng Chu and Hsiang-Lin Yen are the sole officers and directors of the corporation and thus are promoters. Ruei-Peng Chu’s address is 11/F-1 11 Taizi Road Nanshan District, Shenzhen Guangdong, China 158000, he holds, 90,000 common shares all of which bear a restrictive legend, and he has owned the shares since April 4, 2019. All of the officers utilize the address at 11/F-1 11 Taizi Road Nanshan District, Shenzhen Guangdong, China. I have reviewed the information as published by Keynes Technology Co. Ltd and have discussed such information with management and a director. I also inquired of such management and director if they, counsel (Elaine Dowling, Esq.) or any five percent (5%) shareholder was under any investigation by any federal or state regulatory authority for any violation of federal or states securities laws and to be best of my knowledge none are.

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There have been no sales of the Securities by Insiders within the twelve-month period prior to the opinion. Nothing has come to the attention of myself indicating that any of the Insiders is in possession of any material non-public information regarding the Issuer or the Securities that would prohibit any of them from buying or selling the Securities under Rules 10b-5 or 10b5-1 under the Exchange Act. No person other than OTC Markets is entitled to rely on this opinion but OTC Markets may post this opinion on the OTC Markets News Service for viewing by the public and regulators.

Sincerely,  
EAD Law Group, LLC

A handwritten signature in cursive script that reads "Elaine Dowling". The signature is written in dark ink and is positioned below the typed name.

Elaine Dowling, Esq.

EAD: gd