

White paper drafted under the European Markets in Crypto-Assets Regulation (EU) 2023/1114 for FFG 8SQN5VKWH



Preamble

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01. Date of notification

2025-06-10

02. Statement in accordance with Article 6(3) of Regulation (EU) 2023/1114

This crypto-asset white paper has not been approved by any competent authority in any Member State of the European Union. The person seeking admission to trading of the crypto-asset is solely responsible for the content of this crypto-asset white paper.

03. Compliance statement in accordance with Article 6(6) of Regulation (EU) 2023/1114

This crypto-asset white paper complies with Title II of Regulation (EU) 2023/1114 of the European Parliament and of the Council and, to the best of the knowledge of the management body, the information presented in the crypto-asset white paper is fair, clear and not misleading and the crypto-asset white paper makes no omissions likely to affect its import.

04. Statement in accordance with Article 6(5), points (a), (b), (c), of Regulation (EU) 2023/1114

The crypto-asset referred to in this crypto-asset white paper may lose its value in part or in full, may not always be transferable and may not be liquid.

05. Statement in accordance with Article 6(5), point (d), of Regulation (EU) 2023/1114

The tokens allow token holders to perform various governance functions within a decentralized autonomous organization (DAO), among other things.



Since the token has additional functions (hybrid token), these are already conceptually not utility tokens within the meaning of the MiCAR within the definition of Article 3 (1), due to the necessity of the "exclusivity".

06. Statement in accordance with Article 6(5), points (e) and (f), of Regulation (EU) 2023/1114

The crypto-asset referred to in this white paper is not covered by the investor compensation schemes under Directive 97/9/EC of the European Parliament and of the Council or the deposit guarantee schemes under Directive 2014/49/EU of the European Parliament and of the Council.

Summary

07. Warning in accordance with Article 6(7), second subparagraph, of Regulation (EU) 2023/1114

Warning: This summary should be read as an introduction to the crypto-asset white paper. The prospective holder should base any decision to purchase this crypto-asset on the content of the crypto-asset white paper as a whole and not on the summary alone. The offer to the public of this crypto-asset does not constitute an offer or solicitation to purchase financial instruments and any such offer or solicitation can be made only by means of a prospectus or other offer documents pursuant to the applicable national law. This crypto-asset white paper does not constitute a prospectus as referred to in Regulation (EU) 2017/1129 of the European Parliament and of the Council or any other offer document pursuant to union or national law.

08. Characteristics of the crypto-asset

ai16z tokens this white paper refers to are crypto-assets other than EMTs and ARTs, which are available on the Solana blockchain (2025-03-16 and according to DTI FFG shown in F.14).



The initial production of the 1,000,000,000 tokens (the so-called "mint") took place on October 25, 2024 01:44:39 +UTC (see transaction hash: 3djvt4PcrUKLRaUn7BDrZvxHPdqBpUJ2VUx2hEDGwJDkopbVPgMiWbwmYdSfUmNdZLjxS Y2E8zMmarJyKf5VXfw1).

There was a second minting event of 100,000,000 tokens on October 25, 2024 02:29:30 +UTC (see transaction hash: 4E1zWekW2Bxyk3XtMgU9kPuQbizouZkq1yizH656dE9ZqidrKzfpWzBJwAYeypsj4Rd6hCya ssVS1EBnYZTZtcBf).

The tokens allow token holders to perform various governance functions within a decentralized autonomous organization (DAO), among other things.

Since the token has additional functions (hybrid token), these are already conceptually not utility tokens within the meaning of the MiCAR within the definition of Article 3 (1), due to the necessity of the "exclusivity".

09. Information about the quality and quantity of goods or services to which the utility tokens give access and restrictions on the transferability

The tokens allow token holders to perform various governance functions within a decentralized autonomous organization (DAO), among other things.

Since the token has additional functions (hybrid token), these are already conceptually not utility tokens within the meaning of the MiCAR within the definition of Article 3 (1), due to the necessity of the "exclusivity".

10. Key information about the offer to the public or admission to trading

Crypto Risk Metrics GmbH is seeking admission to trading on any Crypto Asset Service Provider platform in the European Union in accordance to Article 5 of REGULATION (EU) 2023/1114 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 31 May 2023 on markets in crypto-assets, and amending Regulations (EU) No 1093/2010 and (EU) No



1095/2010 and Directives 2013/36/EU and (EU) 2019/1937. In accordance to Article 5(4), this crypto-asset white paper may be used by entities admitting the token to trading after Crypto Risk Metrics GmbH as the person responsible for drawing up such white paper has given its consent to its use in writing to the repective Crypto Asset Service Provider. If a CASP wishes to use this white paper, inquiries can be made under info@crypto-risk-metrics.com.

Part A – Information about the offeror or the person seeking admission to trading

A.1 Name

Crypto Risk Metrics GmbH

A.2 Legal form

2HBR

A.3 Registered address

DE, Lange Reihe 73, 20099 Hamburg, Germany

A.4 Head office

Not applicable.

A.5 Registration date

2018-12-03

A.6 Legal entity identifier

39120077M9TG0O1FE242

A.7 Another identifier required pursuant to applicable national law

Crypto Risk Metrics GmbH is registered with the commercial register in the the city of Hamburg, Germany, under number HRB 154488.



A.8 Contact telephone number

+4915144974120

A.9 E-mail address

info@crypto-risk-metrics.com

A.10 Response time (Days)

030

A.11 Parent company

Not applicable.

A.12 Members of the management body

Name	Position	Address
Tim Zölitz	Chairman	Lange Reihe 73, 20099 Hamburg, Germany

A.13 Business activity

Crypto Risk Metrics GmbH is a technical service provider, who supports regulated entities in the fulfillment of their regulatory requirements. In this regard, Crypto Risk Metrics GmbH acts as a data-provider for ESG-data according to article 66 (5). Due to the regulations laid out in article 5 (4) of the REGULATION (EU) 2023/1114 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 31 May 2023 on markets in crypto-assets, and amending Regulations (EU) No 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937, Crypto Risk Metrics GmbH aims at providing central services for crypto-asset white papers in order to minimize market confusion due to conflicting white papers for the same asset.

A.14 Parent company business activity

Not applicable.

A.15 Newly established

Crypto Risk Metrics GmbH has been etablished since 2018 and is therefore not newly

established (i. e. older than three years).

A.16 Financial condition for the past three years

Crypto Risk Metrics GmbH's profit after tax for the last three financial years are as

follows:

2024 (unaudited): negative 50.891,81 EUR

2023 (unaudited): negative 27.665,32 EUR

2022: 104.283,00 EUR.

As 2023 and 2024 were the years building software for the MiCAR-Regulation which was

not yet in place, revenue streams from these investments are expeted to be generated

in 2025.

A.17 Financial condition since registration

This point would only be applicable if the company were newly established and the

financial conditions for the past three years had not been provided in the bulletpoint

before.

Part B - Information about the issuer, if different from the offeror

or person seeking admission to trading

B.1 Issuer different from offeror or person seeking admission to trading

Yes

B.2 Name

The Al16Z project, later rebranded as ElizaOS, was founded by Shaw Walters in October

2024. Walters is an entrepreneur with a background in artificial intelligence,

decentralized finance (DeFi), and blockchain technology. Prior to founding Al16Z, he

worked on various initiatives and participated in early-stage Web3 startups,

according to his public LinkedIn profile (https://www.linkedin.com/in/shaw-walters-

36603a289/, accessed on 2025-04-24).

According to the project statement on the website (https://www.elizaos.ai/dao, accessed

on 2025-04-24), the tokens are managed by a DAO that has the corresponding control

over the crypto-asset. Shaw Walters should therefore not be referred to as the issuer. At

the time of writing the white paper (2025-04-24), the mint and update authorities of the

data account have the public address

"AZtt8LUScEAG74iKnPNRuYgQhwmGJhAf6yUkAXjAd8sp".

B.3 Legal form

Due to the nature of the DAO, the crypto-asset does not have a management body as

defined in Article 3(1), point (27), of Regulation (EU) 2023/1114.

B4. Registered address

Due to the nature of the DAO, the crypto-asset does not have a registered address.

B.5 Head office

Due to the nature of the DAO, the crypto-asset does not have a head office.

B.6 Registration date

Due to the nature of the DAO, the crypto-asset does not have a registered date. Both

minting events took place on 2024-10-25.

B.7 Legal entity identifier

Due to the nature of the DAO, the crypto-asset does not have a legal entity identifier.

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B.8 Another identifier required pursuant to applicable national law

Not applicable.

B.9 Parent company

Not applicable.



B.10 Members of the management body

Due to the nature of the DAO, the crypto-asset does not have a management body as defined in Article 3(1), point (27), of Regulation (EU) 2023/1114.

B.11 Business activity

Not applicable.

B.12 Parent company business activity

Not applicable.

Part C – Information about the operator of the trading platform in cases where it draws up the crypto-asset white paper and information about other persons drawing the crypto-asset white paper pursuant to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114

C.1 Name

Not applicable.

C.2 Legal form

Not applicable.

C.3 Registered address

Not applicable.

C.4 Head office

Not applicable.

C.5 Registration date

Not applicable.

C.6 Legal entity identifier

Not applicable.



C.7 Another identifier required pursuant to applicable national law

Not applicable.

C.8 Parent company

Not applicable.

C.9 Reason for crypto-Asset white paper Preparation

Not applicable.

C.10 Members of the Management body

Not applicable.

C.11 Operator business activity

Not applicable.

C.12 Parent company business activity

Not applicable.

C.13 Other persons drawing up the crypto-asset white paper according to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114

Not applicable.

C.14 Reason for drawing the white paper by persons referred to in Article 6(1), second subparagraph, of Regulation (EU) 2023/1114

Not applicable.

Part D - Information about the crypto-asset project

D.1 Crypto-asset project name

Long Name: "ai16z", Short Name: "ai16z" according to the Digital Token Identifier Foundation (www.dtif.org, DTI see F.13, FFG DTI see F.14 as of 2025-04-24).

D.2 Crypto-assets name

See F.13.



D.3 Abbreviation

See F.13.

D.4 Crypto-asset project description

The Al16Z project, later rebranded as ElizaOS, was founded by Shaw Walters in October 2024. Walters is an entrepreneur with a background in artificial intelligence, decentralized finance (DeFi), and blockchain technology.

As stated on the website https://www.daos.fun/HeLp6NuQkmYB4pYWo2zYs22mESHXPQYzXbB8n4V98jwC (accessed at 2025-04-20), ai16z is the first Al VC fund, fully managed by Marc Alndreessen with recommendations from the members of the DAO. Token holders have some kind of governance rights within this DAO.

In January 2025, due to ongoing confusion with the venture capital firm Andreessen Horowitz (commonly referred to as "a16z"), led to the decision to rename the project to ElizaOS.

D.5 Details of all natural or legal persons involved in the implementation of the cryptoasset project

Name	Role
Shaw Walters	The Al16Z project, later rebranded as ElizaOS, was founded by Shaw Walters in October 2024. Walters is an entrepreneur with a background in artificial intelligence, decentralized finance (DeFi), and blockchain technology. Prior to founding Al16Z, he worked on various initiatives and participated in early-stage Web3 startups, according to his public LinkedIn profile (https://www.linkedin.com/in/shaw-walters-36603a289/,
	accessed on 2025-04-24). According to the project



	statement on the website (https://www.elizaos.ai/dao,
	accessed on 2025-04-24), the tokens are managed by a
	DAO that has the corresponding control over the
	crypto-asset. Shaw Walters should therefore not be
	referred to as the issuer. At the time of writing the white
	paper (2025-04-24), the mint and update authorities of
	the data account have the public address
	"AZtt8LUScEAG74iKnPNRuYgQhwmGJhAf6yUkAXjAd8sp".
Github contributors	Within the official GitHub repository for the project
	(https://github.com/elizaOS), six people are listed, one of
	whom can be traced back to Shaw Walters.

D.6 Utility Token Classification

Since the token has additional functions (hybrid token), these are already conceptually not utility tokens within the meaning of the MiCAR within the definition of Article 3 (1), due to the necessity of the "exclusivity".

D.7 Key Features of Goods/Services for Utility Token Projects

Not applicable.

D.8 Plans for the token

There is no official roadmap for the token, since proposals can be made and voted on within the DAO. The website (https://www.elizaos.ai/faq, accessed on 2025-04-26) describes in a FAQ section that planned projects include: "agent marketplace," "autonomous investor," and "DegenSpartanai". However, this information is not legally binding, as it may be changed at any time without consequence. There is no entitlement to implementation or similar.

D.9 Resource allocation

No information was available for this crypto-asset at the time of writing this white paper (2025-04-22)

D.10 Planned use of Collected funds or crypto-Assets

See D.9.

Part E – Information about the offer to the public of crypto-assets

or their admission to trading

E.1 Public offering or admission to trading

The white paper concerns the admission to trading (i. e. ATTR) on any Crypto Asset

Service Providers platform that has obtained the written consent of Crypto Risk Metrics

GmbH as the person drafting this white paper.

E.2 Reasons for public offer or admission to trading

As already stated in A.13, Crypto Risk Metrics GmbH aims to provide central services to

draw up crypto-asset white papers in accordance to COMMISSION IMPLEMENTING

REGULATION (EU) 2024/2984. These services are offered in order to minimize market

confusion due to conflicting white papers for the same asset drawn up from different

Crypto Asset Service Providers. As of now, such a scenario seems highly likely as a

Crypto Asset Service Provider who drew up a crypto-asset white paper and admitted the

respective token in the Union has no incentive to give his written consent to another

Crypto Asset Service Provider according to Article 5 (4 b) of the REGULATION (EU)

2023/1114 to use the white paper for his regulatory obligations, as this would 1.

strenghthen the market-positioning of the other Crypto Asset Service Provider (who is

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most likely a competitor) and 2. also entail liability risks.

E.3 Fundraising target

Not applicable.

E.4 Minimum subscription goals

Not applicable.

E.5 Maximum subscription goals

Not applicable.



E.6 Oversubscription acceptance

Not applicable.

E.7 Oversubscription allocation

Not applicable.

E.8 Issue price

Not applicable, as this white paper is written to support admission to trading and not for the initial offer to the public.

E.9 Official currency or any other crypto-assets determining the issue price

Not applicable, as this white paper is written to support admission to trading and not for the initial offer to the public.

E.10 Subscription fee

Not applicable, as this white paper is written to support admission to trading and not for the initial offer to the public.

E.11 Offer price determination method

Once the token is admitted to trading its price will be determined by demand (buyers) and supply (sellers).

E.12 Total number of offered/traded crypto-assets

1,100,000,000 tokens were generated in both previous mints (see above). Tokens can be removed from the market through burn processes. At the time of writing this white paper (2025-04-25), there are 1,099,998,656.27 tokens in circulation on the blockchain, which can change anytime in the future.

E.13 Targeted holders

ALL



E.14 Holder restrictions

The Holder restrictions are subject to the rules applicable to the Crypto Asset Service Provider as well as additional restrictions the Crypto Asset Service Providers might set in force.

E.15 Reimbursement notice

Not applicable.

E.16 Refund mechanism

Not applicable.

E.17 Refund timeline

Not applicable.

E.18 Offer phases

Not applicable.

E.19 Early purchase discount

Not applicable.

E.20 Time-limited offer

Not applicable.

E.21 Subscription period beginning

Not applicable.

E.22 Subscription period end

Not applicable.

E.23 Safeguarding arrangements for offered funds/crypto- Assets

Not applicable.

E.24 Payment methods for crypto-asset purchase

The payment methods are subject to the respective capabilities of the Crypto Asset

Service Provider listing the crypto-asset.

E.25 Value transfer methods for reimbursement

Not applicable.

E.26 Right of withdrawal

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.27 Transfer of purchased crypto-assets

The transfer of purchased crypto-assets are subject to the respective capabilities of the

Crypto Asset Service Provider listing the crypto-asset.

E.28 Transfer time schedule

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.29 Purchaser's technical requirements

The technical requirements that the purchaser is required to fulfil to hold the crypto-

assets of purchased crypto-assets are subject to the respective capabilities of the

Crypto Asset Service Provider listing the crypto-asset.

E.30 Crypto-asset service provider (CASP) name

Not applicable.

E.31 CASP identifier

Not applicable.

E.32 Placement form

Not applicable.

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E.33 Trading platforms name

The trading on all MiCAR-compliant trading platforms is sought.

E.34 Trading platforms Market identifier code (MIC)

Not applicable.

E.35 Trading platforms access

This depends on the trading platform listing the asset.

E.36 Involved costs

This depends on the trading platform listing the asset. Furthermore, costs may occur for making transfers out of the platform (i. e. "gas costs" for blockchain network use that

may exceed the value of the crypto-asset itself).

E.37 Offer expenses

Not applicable, as this crypto-asset white paper concerns the admission to trading and

not the offer of the token to the public.

E.38 Conflicts of interest

MiCAR-compliant Crypto Asset Service Providers shall have strong measurements in

place in order to manage conflicts of interests. Due to the broad audience this white-

paper is adressing, potential investors should always check the conflicts of Interest

policy of their respective counterparty.

E.39 Applicable law

Not applicable, as it is referred to on "offer to the public" and in this white-paper, the

admission to trading is sought.

E.40 Competent court

Not applicable, as it is referred to on "offer to the public" and in this white-paper, the

admission to trading is sought.

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Part F – Information about the crypto-assets

F.1 Crypto-asset type

The crypto-asset described in the white paper is classified as a crypto-asset under the Markets in Crypto-Assets Regulation (MiCAR) but does not qualify as an electronic money token (EMT) or an asset-referenced token (ART). It is a digital representation of value that can be stored and transferred using distributed ledger technology (DLT) or similar technology, without embodying or conferring any rights to its holder.

The asset does not aim to maintain a stable value by referencing an official currency, a basket of assets, or any other underlying rights. Instead, its valuation is entirely market-driven, based on supply and demand dynamics, and not supported by a stabilization mechanism. It is neither pegged to any fiat currency nor backed by any external assets, distinguishing it clearly from EMTs and ARTs.

Furthermore, the crypto-asset is not categorized as a financial instrument, deposit, insurance product, pension product, or any other regulated financial product under EU law. It does not grant financial rights, voting rights, or any contractual claims to its holders, ensuring that it remains outside the scope of regulatory frameworks applicable to traditional financial instruments.

F.2 Crypto-asset functionality

The tokens allow token holders to perform various governance functions within a decentralized autonomous organization (DAO). However, due to the novelty of this concept, the exact rights of token holders are subject to legal and technical risks. The novel governance structure of a DAO, which has a significant influence on the project, creates additional risks for investors.

The DAO can make decisions that adversely affect the investor.

F.3 Planned application of functionalities

All functionalities referred to in F.2 have already been applied. There were no statements made to further functionalities for the crypto-asset (2025-04-22)

A description of the characteristics of the crypto asset, including the

data necessary for classification of the crypto-asset white paper in the

register referred to in Article 109 of Regulation (EU) 2023/1114, as

specified in accordance with paragraph 8 of that Article

F.4 Type of crypto-asset white paper

The white paper type is "other crypto-assets" (i. e. "OTHR").

F.5 The type of submission

The white paper submission type is "NEWT", which stands for new token.

F.6 Crypto-asset characteristics

The tokens are crypto-assets other than EMTs and ARTs, which are available on the

Solana blockchain. The tokens are fungible (up to 9 digits after the decimal point), and a

total of 1,100,000,000 have already been issued. The tokens are a digital representation

of value.

F.7 Commercial name or trading name

See F.13.

F.8 Website of the issuer

https://www.elizaos.ai/dao

F.9 Starting date of offer to the public or admission to trading

2025-06-10

F.10 Publication date

2025-06-10

F.11 Any other services provided by the issuer

As the issuer of the token could not be determined due to the nature of a DAO it is not

possible to exclude a possibility that the issuer of the token provides or will provide

other services not covered by Regulation (EU) 2023/1114 (i.e. MiCAR).

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F.12 Language or languages of the crypto-asset white paper

ΕN

F.13 Digital token identifier code used to uniquely identify the crypto-asset or each of the several crypto assets to which the white paper relates, where available

2PZTQFMK4

F.14 Functionally fungible group digital token identifier, where available

8SQN5VKWH

F.15 Voluntary data flag

Mandatory.

F.16 Personal data flag

The white paper does contain personal data.

F.17 LEI eligibility

The issuer should be eligible for a Legal Entity Identifier.

F.18 Home Member State

Germany

F.19 Host Member States

Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden

Part G – Information on the rights and obligations attached to the crypto-assets

G.1 Purchaser rights and obligations

The tokens allow token holders to perform various governance functions within a decentralized autonomous organization (DAO). However, due to the novelty of this

concept, the exact rights of token holders are subject to legal and technical risks. The

novel governance structure of a DAO, which has a significant influence on the project,

creates additional risks for investors.

The DAO can make decisions that adversely affect the investor.

G.2 Exercise of rights and obligations

The tokens allow token holders to perform various governance functions within a

decentralized autonomous organization (DAO). However, due to the novelty of this

concept, the exact rights of token holders are subject to legal and technical risks. The

novel governance structure of a DAO, which has a significant influence on the project,

creates additional risks for investors.

The DAO can make decisions that adversely affect the investor.

G.3 Conditions for modifications of rights and obligations

The DAO can influence governance structures. Due to its novelty and dynamic nature,

these structures are not fixed, which represents a risk of modification for investors.

G.4 Future public offers

Information on the future offers to the public of crypto-assets were not available at the

time of writing this white paper (2025-03-08 until 2025-04-24).

G.5 Issuer retained crypto-assets

There is no information from the issuer or the DAO as to how many tokens are held by

them or associated persons. The current distribution can be changed at any time.

The actual distribution of tokens can be traced on-chain

(https://solscan.io/token/HeLp6NuQkmYB4pYWo2zYs22mESHXPQYzXbB8n4V98jwC#hol

ders). The investor must be aware that a public address cannot necessarily be assigned

to a single person or other entity.

It is not possible to determine exactly how many assets will be retained by the issuer.



G.6 Utility token classification

No

G.7 Key features of goods/services of utility tokens

Not applicable.

G.8 Utility tokens redemption

Not applicable.

G.9 Non-trading request

The admission to trading is sought.

G.10 Crypto-assets purchase or sale modalities

Not applicable, as the admission to trading of the tokens is sought.

G.11 Crypto-assets transfer restrictions

The crypto-assets as such do not have any transfer restrictions and are generally freely transferable. The Crypto Asset Service Providers can impose their own restrictions in agreements they enter with their clients. The Crypto Asset Service Providers may impose restrictions to buyers and sellers in accordance with applicable laws and internal policies and terms.

G.12 Supply adjustment protocols

As stated on the website https://www.elizaos.ai/dao (accessed at 2025-04-22) the Supply can be adjusted by minting new tokens, if the DAO votes to do so. Also, it is possible to decrease the circulating supply, by transferring crypto-assets to so called "burn-adresses", which are adresses that render the crypto-asset "non-transferable" after sent to those adresses.

At the time of writing the white paper (2025-04-24), the mint and update authorities of the data account have the public address "AZtt8LUScEAG74iKnPNRuYgQhwmGJhAf6yUkAXjAd8sp".



G.13 Supply adjustment mechanisms

The mint authority (the entity who can create new tokens of that crypto-asset), as stated in the mint's data account, has the potential right to change the supply of the crypto-assets.

G.14 Token value protection schemes

No, the token does not have value protection schemes.

G.15 Token value protection schemes description

Not applicable.

G.16 Compensation schemes

No, the token does not have compensation schemes.

G.17 Compensation schemes description

Not applicable.

G.18 Applicable law

Applicable law likely depends on the location of any particular transaction with the token.

G.19 Competent court

Competent court likely depends on the location of any particular transaction with the token.

Part H – information on the underlying technology

H.1 Distributed ledger technology (DTL)

See F.13.

H.2 Protocols and technical standards

The tokens were created with Solana's Token Program, a smart contract that is part of the Solana Program Library (SPL). Such tokens are commonly referred to as SPL-token.

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The token itself is not an additional smart contract, but what is called a data account on Solana. As the name suggests data accounts store data on the blockchain. However, unlike smart contracts, they cannot be executed and cannot perform any operations. Since one cannot interact with data accounts directly, any interaction with an SPL-token is done via Solana's Token Program. The source code of this smart contract can be found here https://github.com/solana-program/token.

The Token Program is developed in Rust, a memory-safe, high-performance programming language designed for secure and efficient development. On Solana, Rust is said to be the primary language used for developing on-chain programs (smart contracts), intended to ensure safety and reliability in decentralized applications (dApps).

Core functions of the Token Program:

initialize_mint() \rightarrow Create a new type of token, called a mint

mint_to() → Mints new tokens of a specific type to a specified account

burn() → Burns tokens from a specified account, reducing total supply

transfer() → Transfers tokens between accounts

approve() → Approves a delegate to spend tokens on behalf of the owner

set_authority() → Updates authorities (mint, freeze, or transfer authority)

These functions ensure basic operations like transfers, and minting/burning can be performed within the Solana ecosystem.

In addition to the Token Program, another smart contract, the Metaplex Token Metadata Program is commonly used to store name, symbol, and URI information for better ecosystem compatibility. This additional metadata has no effect on the token's functionality.

H.3 Technology used

1. Solana-Compatible Wallets: The tokens are supported by all wallets compatible with

Solana's Token Program

2. Decentralized Ledger: The Solana blockchain acts as a decentralized ledger for all

token transactions, with the intention to preserving an unalterable record of token

transfers and ownership to ensure both transparency and security.

3. SPL Token Program: The SPL (Solana Program Library) Token Program is an inherent

Solana smart contract built to create and manage new types of tokens (so called mints).

This is significantly different from ERC-20 on Ethereum, because a single smart contract

that is part of Solana's core functionality and as such is open source, is responsible for

all the tokens. This ensures a high uniformity across tokens at the cost of flexibility.

4. Blockchain Scalability: With its intended capacity for processing a lot of transactions

per second and in most cases low fees, Solana is intended to enable efficient token

transactions, maintaining high performance even during peak network usage.

Security Protocols for Asset Custody and Transactions:

1. Private Key Management: To safeguard their token holdings, users must securely

store their wallet's private keys and recovery phrases.

2. Cryptographic Integrity: Solana employs elliptic curve cryptography to validate and

execute transactions securely, intended to ensure the integrity of all transfers.

H.4 Consensus mechanism

Solana uses a combination of Proof of History (PoH) and Proof of Stake (PoS). The core

concepts of the mechanism are intended to work as follows:

Core Concepts

1. Proof of History (PoH):

Time-Stamped Transactions: PoH is a cryptographic technique that timestamps

transactions, intended to creating a historical record that proves that an event has

occurred at a specific moment in time.

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Verifiable Delay Function: PoH uses a Verifiable Delay Function (VDF) to generate a

unique hash that includes the transaction and the time it was processed. This sequence

of hashes provides a verifiable order of events, intended to enabling the network to

efficiently agree on the sequence of transactions.

2. Proof of Stake (PoS):

Validator Selection: Validators are chosen to produce new blocks based on the number

of SOL tokens they have staked. The more tokens staked, the higher the chance of being

selected to validate transactions and produce new blocks.

Delegation: Token holders can delegate their SOL tokens to validators, earning rewards

proportional to their stake while intended to enhancing the network's security.

Consensus Process

1. Transaction Validation:

Transactions are broadcasted to the network and collected by validators. Each

transaction is validated to ensure it meets the network's criteria, such as having correct

signatures and sufficient funds.

2. PoH Sequence Generation:

A validator generates a sequence of hashes using PoH, each containing a timestamp

and the previous hash. This process creates a historical record of transactions,

establishing a

cryptographic clock for the network.

3. Block Production:

The network uses PoS to select a leader validator based on their stake. The leader is

responsible for bundling the validated transactions into a block. The leader validator

uses the PoH sequence to order transactions within the block, ensuring that all

transactions are processed in the correct order.

4. Consensus and Finalization:

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Other validators verify the block produced by the leader validator. They check the

correctness of the PoH sequence and validate the transactions within the block. Once

the block is verified, it is added to the blockchain. Validators sign off on the block, and it

is considered finalized.

Security and Economic Incentives

1. Incentives for Validators:

Block Rewards: Validators earn rewards for producing and validating blocks. These

rewards are distributed in SOL tokens and are proportional to the validator's stake and

performance.

Transaction Fees: Validators also earn transaction fees from the transactions included in

the blocks they produce. These fees provide an additional incentive for validators to

process transactions efficiently.

2. Security:

Staking: Validators must stake SOL tokens to participate in the consensus process. This

staking acts as collateral, incentivizing validators to act honestly. If a validator behaves

maliciously or fails to perform, they risk losing their staked tokens.

Delegated Staking: Token holders can delegate their SOL tokens to validators, intended

to enhance network security and decentralization. Delegators share in the rewards and

are incentivized to choose reliable validators.

3. Economic Penalties:

Slashing: Validators can be penalized for malicious behavior, such as double-signing or

producing invalid blocks. This penalty, known as slashing, results in the loss of a portion

of the staked tokens, discouraging dishonest actions.

H.5 Incentive mechanisms and applicable fees

1. Validators:

Staking Rewards: Validators are chosen based on the number of SOL tokens they have

staked. They earn rewards for producing and validating blocks, which are distributed in

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SOL. The more tokens staked, the higher the chances of being selected to validate

transactions and produce new blocks.

Transaction Fees: Validators earn a portion of the transaction fees paid by users for the

transactions they include in the blocks. This is intended to provide an additional financial

incentive for validators to process transactions efficiently and maintain the network's

integrity.

2. Delegators:

Delegated Staking: Token holders who do not wish to run a validator node can delegate

their SOL tokens to a validator. In return, delegators share the rewards earned by the

validators. This is intended to encourage widespread participation in securing the

network and ensures decentralization.

3. Economic Security:

Slashing: Validators can be penalized for malicious behavior, such as producing invalid

blocks or being frequently offline. This penalty, known as slashing, involves the loss of a

portion of their staked tokens. Slashing is intended to deter dishonest actions and

ensures that validators act in the best interest of the network.

Opportunity Cost: By staking SOL tokens, validators and delegators lock up their tokens,

which could otherwise be used or sold. This opportunity cost is intended to incentivize

participants to act honestly to earn rewards and avoid penalties.

Fees Applicable on the Solana Blockchain

1. Transaction Fees:

Solana is designed to handle a high throughput of transactions, which is intended to

keep the fees low and predictable.

Fee Structure: Fees are paid in SOL and are used to compensate validators for the

resources they expend to process transactions. This includes computational power and

network bandwidth.

2. Rent Fees:

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State Storage: Solana charges so called ""rent fees"" for storing data on the blockchain.

These fees are designed to discourage inefficient use of state storage and encourage

developers to clean up unused state. Rent fees are intended to help maintain the

efficiency and performance of the network.

3. Smart Contract Fees:

Execution Costs: Similar to transaction fees, fees for deploying and interacting with

smart contracts on Solana are based on the computational resources required. This is

intended to ensure that users are charged proportionally for the resources they

consume.

H.6 Use of distributed ledger technology

No, DLT is not operated by the issuer or a third party acting on the issuer's behalf.

H.7 DLT functionality description

Not applicable.

H.8 Audit

As we are understanding the question relating to "technology" to be interpreted in a

broad sense, the answer answer to whether an audit of "the technology used" was

conducted is "no, we can not guarantee, that all parts of the technology used have been

audited". This is due to the fact this report focusses on risk, and we can not guarantee

that each part of the technology used was audited.

H.9 Audit outcome

Not applicable.

Part I - Information on risks

I.1 Offer-related risks

1. Regulatory and Compliance

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This white paper has been prepared with utmost caution; however, uncertainties in the

regulatory requirements and future changes in regulatory frameworks could potentially

impact the token's legal status and its tradability. There is also a high probability that

other laws will come into force, changing the rules for the trading of the token.

Therefore, such developments shall be monitored and acted upon accordingly.

2. Operational and Technical

Blockchain Dependency: The token is entirely dependent on the blockchain the crypto-

asset is issued upon (as of 2025-04-05). Any issues, such as downtime, congestion, or

security vulnerabilities within the blockchain, could adversely affect the token's

functionality.

Smart Contract Risks: Smart contracts governing the token may contain hidden

vulnerabilities or bugs that could disrupt the token offering or distribution processes.

Connection Dependency: As the trading of the token also involves other trading venues,

technical risks such as downtime of the connection or faulty code are also possible.

Human errors: Due to the irrevocability of blockchain-transactions, approving wrong

transactions or using incorrect networks/addresses will most likely result in funds not

being accessibly anymore.

Custodial risk: When admitting the token to trading, the risk of losing clients assets due

to hacks or other malicious acts is given. This is due to the fact the token is hold in

custodial wallets for the customers.

3. Market and Liquidity

Volatility: The token will most likely be subject to high volatility and market speculation.

Price fluctuations could be significant, posing a risk of substantial losses to holders.

Liquidity Risk: Liquidity is contingent upon trading activity levels on decentralized

exchanges (DEXs) and potentially on centralized exchanges (CEXs), should they be

involved. Low trading volumes may restrict the buying and selling capabilities of the

tokens.

4. Counterparty

As the admission to trading involves the connection to other trading venues,

counterparty risks arise. These include, but are not limited to, the following risks:

General Trading Platform Risk: The risk of trading platforms not operating to the highest

standards is given. Examples like FTX show that especially in nascent industries,

compliance and oversight-frameworks might not be fully established and/or enforced.

Listing or Delisting Risks: The listing or delisting of the token is subject to the trading

partners internal processes. Delisting of the token at the connected trading partners

could harm or completely halt the ability to trade the token.

5. Liquidity

Liquidity of the token can vary, especially when trading activity is limited. This could

result in high slippage when trading a token.

6. Failure of one or more Counterparties

Another risk stems from the internal operational processes of the counterparties used.

As there is no specific oversight other than the typical due diligence check, it cannot be

guaranteed that all counterparties adhere to the best market standards.

Bankruptcy Risk: Counterparties could go bankrupt, possibly resulting in a total loss for

the clients assets hold at that counterparty.

I.2 Issuer-related risks

1. Insolvency

As with every other commercial endeavor, the risk of insolvency of the issuer is given.

This could be caused by but is not limited to lack of interest from the public, lack of

funding, incapacitation of key developers and project members, force majeure (including

pandemics and wars) or lack of commercial success or prospects.

2. Counterparty

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In order to operate, the issuer has most likely engaged in different business

relationships with one or more third parties on which it strongly depends on. Loss or

changes in the leadership or key partners of the issuer and/or the respective

counterparties can lead to disruptions, loss of trust, or project failure. This could result

in a total loss of economic value for the crypto-asset holders.

3. Legal and Regulatory Compliance

Cryptocurrencies and blockchain-based technologies are subject to evolving regulatory

landscapes worldwide. Regulations vary across jurisdictions and may be subject to

significant changes. Non-compliance can result in investigations, enforcement actions,

penalties, fines, sanctions, or the prohibition of the trading of the crypto-asset impacting

its viability and market acceptance. This could also result in the issuer to be subject to

private litigation. The beforementioned would most likely also lead to changes with

respect to trading of the crypto-asset that may negatively impact the value, legality, or

functionality of the crypto-asset.

4. Operational

Failure to develop or maintain effective internal control, or any difficulties encountered

in the implementation of such controls, or their improvement could harm the issuer's

business, causing disruptions, financial losses, or reputational damage.

5. Industry

The issuer is and will be subject to all of the risks and uncertainties associated with a

memecoin-project, where the token issued has zero intrinsic value. History has shown

that most of this projects resulted in financial losses for the investors and were only set-

up to enrich a few insiders with the money from retail investors.

6. Reputational

The issuer faces the risk of negative publicity, whether due to, without limitation,

operational failures, security breaches, or association with illicit activities, which can

damage the issuer reputation and, by extension, the value and acceptance of the

crypto-asset.

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7. Competition

There are numerous other crypto-asset projects in the same realm, which could have an

effect on the crypto-asset in question.

8. Unanticipated Risk

In addition to the risks included in this section, there might be other risks that cannot be

foreseen. Additional risks may also materialize as unanticipated variations or

combinations of the risks discussed.

I.3 Crypto-assets-related risks

1. Valuation

As the crypto-asset does not have any intrinsic value, and grants neither rights nor

obligations, the only mechanism to determine the price is supply and demand.

Historically, most crypto-assets have dramatically lost value and were not a beneficial

investment for the investors. Therefore, investing in these crypto-assets poses a high

risk, and the loss of funds can occur.

2. Market Volatility

Crypto-asset prices are highly susceptible to dramatic fluctuations influence by various

factors, including market sentiment, regulatory changes, technological advancements,

and macroeconomic conditions. These fluctuations can result in significant financial

losses within short periods, making the market highly unpredictable and challenging for

investors. This is especially true for crypto-assets without any intrinsic value, and

investors should be prepared to lose the complete amount of money invested in the

respective crypto-assets.

3. Liquidity Challenges

Some crypto-assets suffer from limited liquidity, which can present difficulties when

executing large trades without significantly impacting market prices. This lack of liquidity

can lead to substantial financial losses, particularly during periods of rapid market

movements, when selling assets may become challenging or require accepting

unfavorable prices.

4. Asset Security

Crypto-assets face unique security threats, including the risk of theft from exchanges or

digital wallets, loss of private keys, and potential failures of custodial services. Since

crypto transactions are generally irreversible, a security breach or mismanagement can

result in the permanent loss of assets, emphasizing the importance of strong security

measures and practices.

5. Scams

The irrevocability of transactions executed using blockchain infrastructure, as well as the

pseudonymous nature of blockchain ecosystems, attracts scammers. Therefore,

investors in crypto-assets must proceed with a high degree of caution when investing in

if they invest in crypto-assets. Typical scams include - but are not limited to - the

creation of fake crypto-assets with the same name, phishing on social networks or by

email, fake giveaways/airdrops, identity theft, among others.

6. Blockchain Dependency

Any issues with the blockchain used, such as network downtime, congestion, or security

vulnerabilities, could disrupt the transfer, trading, or functionality of the crypto-asset.

7. Smart Contract Vulnerabilities

The smart contract used to issue the crypto-asset could include bugs, coding errors, or

vulnerabilities which could be exploited by malicious actors, potentially leading to asset

loss, unauthorized data access, or unintended operational consequences.

8. Privacy Concerns

All transactions on the blockchain are permanently recorded and publicly accessible,

which can potentially expose user activities. Although addresses are pseudonoymous,

the transparent and immutable nature of blockchain allows for advanced forensic



analysis and intelligence gathering. This level of transparency can make it possible to link blockchain addresses to real-world identities over time, compromising user privacy.

9. Regulatory Uncertainty

The regulatory environment surrounding crypto-assets is constantly evolving, which can directly impact their usage, valuation, and legal status. Changes in regulatory frameworks may introduce new requirements related to consumer protection, taxation, and anti-money laundering compliance, creating uncertainty and potential challenges for investors and businesses operating in the crypto space. Although the crypto-asset do not create or confer any contractual or other obligations on any party, certain regulators may nevertheless qualify the crypto-asset as a security or other financial instrument under their applicable law, which in turn would have drastic consequences for the crypto-asset, including the potential loss of the invested capital in the asset. Furthermore, this could lead to the sellers and its affiliates, directors, and officers being obliged to pay fines, including federal civil and criminal penalties, or make the cryptoasset illegal or impossible to use, buy, or sell in certain jurisdictions. On top of that, regulators could take action against the issuer as well as the trading platforms if the the regulators view the token as an unregistered offering of securities or the operations otherwise as a violation of existing law. Any of these outcomes would negatively affect the value and/or functionality of the crypot-asset and/or could cause a complete loss of funds of the invested money in the crypto-asset for the investor.

10. Counterparty risk

Engaging in agreements or storing crypto-assets on exchanges introduces counterparty risks, including the failure of the other party to fulfill their obligations. Investors may face potential losses due to factors such as insolvency, regulatory non-compliance, or fraudulent activities by counterparties, highlighting the need for careful due diligence when engaging with third parties.

11. Reputational concerns

Crypto-assets are often subject to reputational risks stemming from associations with illegal activities, high-profile security breaches, and technological failures. Such incidents

can undermine trust in the broader ecosystem, negatively affecting investor confidence

and market value, thereby hindering widespread adoption and acceptance.

12. Technological Innovation

New technologies or platforms could render Solana's design less competitive or even

break fundamental parts (i.e., quantum computing might break cryptographic

algorithms used to secure the network), impacting adoption and value. Participants

should approach the crypto-asset with a clear understanding of its speculative and

volatile nature and be prepared to accept these risks and bear potential losses, which

could include the complete loss of the asset's value.

13. Community and Narrative

As the crypto-asset has no intrinsic value, all trading activity is based on the intended

market value is heavily dependent on its community and the popularity of the

memecoin narrative. Declining interest or negative sentiment could significantly impact

the token's value.

14. Interest Rate Change

Historically, changes in interest, foreign exchange rates, and increases in volatility have

increased credit and market risks and may also affect the value of the crypto-asset.

Although historic data does not predict the future, potential investors should be aware

that general movements in local and other factors may affect the market, and this could

also affect market sentiment and, therefore most likely also the price of the crypto-

asset.

15. Taxation

The taxation regime that applies to the trading of the crypto-asset by individual holders

or legal entities will depend on the holder's jurisdiction. It is the holder's sole

responsibility to comply with all applicable tax laws, including, but not limited to, the

reporting and payment of income tax, wealth tax, or similar taxes arising in connection

with the appreciation and depreciation of the crypto-asset.

16. Anti-Money Laundering/Counter-Terrorism Financing

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It cannot be ruled out that crypto-asset wallet addresses interacting with the crypto-

asset have been, or will be used for money laundering or terrorist financing purposes,

or are identified with a person known to have committed such offenses.

17. Market Abuse

It is noteworthy that crypto-assets are potentially prone to increased market abuse

risks, as the underlying infrastructure could be used to exploit arbitrage opportunities

through schemes such as front-running, spoofing, pump-and-dump, and fraud across

different systems, platforms, or geographic locations. This is especially true for crypto-

assets with a low market capitalization and few trading venues, and potential investors

should be aware that this could lead to a total loss of the funds invested in the crypto-

asset.

18. Timeline and Milestones

Critical project milestones could be delayed by technical, operational, or market

challenges.

19. DAO Risks

The novel governance structure of a DAO, which has a significant influence on the

project, creates additional risks for investors. The DAO can make decisions that adversely

affect the investor.

I.4 Project implementation-related risks

As this white paper relates to the "Admission to trading" of the crypto-asset, the

implementation risk is referring to the risks on the Crypto Asset Service Providers side.

These can be, but are not limited to, typical project management risks, such as key-

personal-risks, timeline-risks, and technical implementation-risks.

I.5 Technology-related risks

As this white paper relates to the "Admission to trading" of the crypto-asset, the

technology-related risks mainly lie in the settling on the Solana-Network.

1. Blockchain Dependency Risks

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Solana Network Downtime: Potential outages or congestion on the Solana blockchain

could interrupt on-chain token transfers, trading, and other functions.

Scalability Challenges: Despite Solana's comparatively high throughput design,

unexpected demand or technical issues might compromise its performance.

2. Smart Contract Risks

Vulnerabilities: The smart contract governing the token could contain bugs or

vulnerabilities that may be exploited, affecting token distribution or vesting schedules.

3. Wallet and Storage Risks

Private Key Management: Token holders must securely manage their private keys and

recovery phrases to prevent permanent loss of access to their tokens, which includes

Trading-Venues, who are a prominent target for dedicated hacks.

Compatibility Issues: The tokens require Solana-compatible wallets for storage and

transfer. Any incompatibility or technical issues with these wallets could impact token

accessibility.

4. Network Security Risks

Attack Risks: The Solana blockchain may face threats such as denial-of-service (DoS)

attacks or exploits targeting its consensus mechanism, which could compromise

network integrity.

Centralization Concerns: Although claiming to be decentralized, Solana's relatively

smaller number of validators/concentration of stakes within the network compared to

other blockchains and the influence of the Solana Foundation (as of 2025-03-09) might

pose centralization risks, potentially affecting network resilience.

5. Evolving Technology Risks: Technological Obsolescence: The fast pace of innovation in

blockchain technology may make Solana or the SPL token standard appear less

competitive or become outdated, potentially impacting the usability or adoption of the

token.

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I.6 Mitigation measures

None.

Part J – Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts

J.1 Adverse impacts on climate and other environment-related adverse impacts

S.1 Name

Crypto Risk Metrics GmbH

S.2 Relevant legal entity identifier

39120077M9TG0O1FE242

S.3 Name of the cryptoasset

ai16z

S.4 Consensus Mechanism

Solana uses a combination of Proof of History (PoH) and Proof of Stake (PoS). The core concepts of the mechanism are intended to work as follows:

Core Concepts

1. Proof of History (PoH):

Time-Stamped Transactions: PoH is a cryptographic technique that timestamps transactions, intended to creating a historical record that proves that an event has occurred at a specific moment in time.

Verifiable Delay Function: PoH uses a Verifiable Delay Function (VDF) to generate a unique hash that includes the transaction and the time it was processed. This sequence of hashes provides a verifiable order of events, intended to enabling the network to efficiently agree on the sequence of transactions.

2. Proof of Stake (PoS):

Validator Selection: Validators are chosen to produce new blocks based on the number

of SOL tokens they have staked. The more tokens staked, the higher the chance of being

selected to validate transactions and produce new blocks.

Delegation: Token holders can delegate their SOL tokens to validators, earning rewards

proportional to their stake while intended to enhancing the network's security.

Consensus Process

1. Transaction Validation:

Transactions are broadcasted to the network and collected by validators. Each

transaction is validated to ensure it meets the network's criteria, such as having correct

signatures and sufficient funds.

2. PoH Sequence Generation:

A validator generates a sequence of hashes using PoH, each containing a timestamp

and the previous hash. This process creates a historical record of transactions,

establishing a

cryptographic clock for the network.

3. Block Production:

The network uses PoS to select a leader validator based on their stake. The leader is

responsible for bundling the validated transactions into a block. The leader validator

uses the PoH sequence to order transactions within the block, ensuring that all

transactions are processed in the correct order.

4. Consensus and Finalization:

Other validators verify the block produced by the leader validator. They check the

correctness of the PoH sequence and validate the transactions within the block. Once

the block is verified, it is added to the blockchain. Validators sign off on the block, and it

is considered finalized.

Security and Economic Incentives

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1. Incentives for Validators:

Block Rewards: Validators earn rewards for producing and validating blocks. These

rewards are distributed in SOL tokens and are proportional to the validator's stake and

performance.

Transaction Fees: Validators also earn transaction fees from the transactions included in

the blocks they produce. These fees provide an additional incentive for validators to

process transactions efficiently.

2. Security:

Staking: Validators must stake SOL tokens to participate in the consensus process. This

staking acts as collateral, incentivizing validators to act honestly. If a validator behaves

maliciously or fails to perform, they risk losing their staked tokens.

Delegated Staking: Token holders can delegate their SOL tokens to validators, intended

to enhance network security and decentralization. Delegators share in the rewards and

are incentivized to choose reliable validators.

3. Economic Penalties:

Slashing: Validators can be penalized for malicious behavior, such as double-signing or

producing invalid blocks. This penalty, known as slashing, results in the loss of a portion

of the staked tokens, discouraging dishonest actions.

S.5 Incentive Mechanisms and Applicable Fees

1. Validators:

Staking Rewards: Validators are chosen based on the number of SOL tokens they have

staked. They earn rewards for producing and validating blocks, which are distributed in

SOL. The more tokens staked, the higher the chances of being selected to validate

transactions and produce new blocks.

Transaction Fees: Validators earn a portion of the transaction fees paid by users for the

transactions they include in the blocks. This is intended to provide an additional financial

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incentive for validators to process transactions efficiently and maintain the network's

integrity.

2. Delegators:

Delegated Staking: Token holders who do not wish to run a validator node can delegate

their SOL tokens to a validator. In return, delegators share the rewards earned by the

validators. This is intended to encourage widespread participation in securing the

network and ensures decentralization.

3. Economic Security:

Slashing: Validators can be penalized for malicious behavior, such as producing invalid

blocks or being frequently offline. This penalty, known as slashing, involves the loss of a

portion of their staked tokens. Slashing is intended to deter dishonest actions and

ensures that validators act in the best interest of the network.

Opportunity Cost: By staking SOL tokens, validators and delegators lock up their tokens,

which could otherwise be used or sold. This opportunity cost is intended to incentivize

participants to act honestly to earn rewards and avoid penalties.

Fees Applicable on the Solana Blockchain

1. Transaction Fees:

Solana is designed to handle a high throughput of transactions, which is intended to

keep the fees low and predictable.

Fee Structure: Fees are paid in SOL and are used to compensate validators for the

resources they expend to process transactions. This includes computational power and

network bandwidth.

2. Rent Fees:

State Storage: Solana charges so called ""rent fees" for storing data on the blockchain.

These fees are designed to discourage inefficient use of state storage and encourage

developers to clean up unused state. Rent fees are intended to help maintain the

efficiency and performance of the network.

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3. Smart Contract Fees:

Execution Costs: Similar to transaction fees, fees for deploying and interacting with

smart contracts on Solana are based on the computational resources required. This is

intended to ensure that users are charged proportionally for the resources they

consume.

S.6 Beginning of the period to which the disclosure relates

2024-04-26

S.7 End of the period to which the disclosure relates

2025-04-26

S.8 Energy consumption

534.72292 kWh/a

S.9 Energy consumption sources and methodologies

The energy consumption of this asset is aggregated across multiple components:

To determine the energy consumption of a token, the energy consumption of the

network Solana is calculated first. For the energy consumption of the token, a fraction of

the energy consumption of the network is attributed to the token, which is determined

based on the activity of the crypto-asset within the network. When calculating the

energy consumption, the Functionally Fungible Group Digital Token Identifier (FFG DTI) is

used - if available - to determine all implementations of the asset in scope. The

mappings are updated regularly, based on data of the Digital Token Identifier

Foundation. The information regarding the hardware used and the number of

participants in the network is based on assumptions that are verified with best effort

using empirical data. In general, participants are assumed to be largely economically

rational. As a precautionary principle, we make assumptions on the conservative side

when in doubt, i.e. making higher estimates for the adverse impacts.

S.10 Renewable energy consumption

27.0081797971 %

S.11 Energy intensity

0.00000 kWh

S.12 Scope 1 DLT GHG emissions - Controlled

0.00000 tCO2e/a

S.13 Scope 2 DLT GHG emissions - Purchased

0.18667 tCO2e/a

S.14 GHG intensity

0.00000 kgCO2e

S.15 Key energy sources and methodologies

To determine the proportion of renewable energy usage, the locations of the nodes are to be determined using public information sites, open-source crawlers and crawlers developed in-house. If no information is available on the geographic distribution of the nodes, reference networks are used which are comparable in terms of their incentivization structure and consensus mechanism. This geo-information is merged with public information from Our World in Data, see citation. The intensity is calculated as the marginal energy cost wrt. one more transaction.

Ember (2025); Energy Institute - Statistical Review of World Energy (2024) – with major processing by Our World in Data. "Share of electricity generated by renewables – Ember and Energy Institute" [dataset]. Ember, "Yearly Electricity Data Europe"; Ember, "Yearly Electricity Data"; Energy Institute, "Statistical Review of World Energy" [original data]. Retrieved from https://ourworldindata.org/grapher/share-electricity renewables.

S.16 Key GHG sources and methodologies

To determine the GHG Emissions, the locations of the nodes are to be determined using public information sites, open-source crawlers and crawlers developed in-house. If no information is available on the geographic distribution of the nodes, reference networks are used which are comparable in terms of their incentivization structure and consensus mechanism. This geo- information is merged with public information from



Our World in Data, see citation. The intensity is calculated as the marginal emission wrt. one more transaction.

Ember (2025); Energy Institute - Statistical Review of World Energy (2024) – with major processing by Our World in Data. "Carbon intensity of electricity generation – Ember and Energy Institute" [dataset]. Ember, "Yearly Electricity Data Europe"; Ember, "Yearly Electricity Data"; Energy Institute, "Statistical Review of World Energy" [original data]. Retrieved from https://ourworldindata.org/grapher/carbon-intensity electricity Licenced under CC BY 4.0

