

WHITE PAPER

CTC Ecosystem

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ChartTower Corp. OÜ



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COMPLIANCE STATEMENTS

1. Date of notification

2025-09-30

2. 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 offeror of the crypto-asset is solely responsible for the content of this crypto-asset white paper.

3. 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 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 omission likely to affect its import.

4. 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.

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

The crypto-asset referred to in this crypto-asset white paper may not be exchangeable against the good or service promised in the crypto-asset white paper, especially in the case of a failure or discontinuation of the crypto-asset project.

6. 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

7. 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.

8. Characteristics of the crypto-asset

CTC Token is a utility crypto-asset issued on the Solana blockchain, designed to provide holders with direct access to a diversified set of services within the ChartTower Corp. ecosystem. The token operates under a capped supply of 21,000,000 CTC, ensuring no further issuance beyond the fixed maximum supply.

Its primary function is to enable the purchase or use of services in two main business divisions: Real Estate and Finance & Investments.

CTC Token has been structured with a long-term sustainability model, combining Corporate Treasury management rules that limit market impact, multiple distribution phases different from each other and mechanisms to incentivize holding (final airdrops and utility token benefits).

CTC Token has no intrinsic right to profit distribution or governance within ChartTower Corp. and is not strictly backed by any asset, currency, or reserve. Its market value is entirely determined by supply and demand dynamics on trading venues where it may be admitted. Functionalities are partially available from launch, with additional service integrations planned for next stages according to the project roadmap.

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

CTC Token grants access to a defined and expanding range of professional services delivered by ChartTower Corp. two divisions:

- Real Estate Division – services include residential and commercial property construction or renovation, project management, architectural design, service

management, tailored investment collaborations, and portfolio management for high-value clients.

- Finance & Investments Division – services include Expert Advisors (EA) development, spot portfolio creation or rebalancing, sale of trading signals, and personalized financial consultancy.

Holders may benefit from discounts when paying in CTC or receive cashback in CTC when using alternative payment methods. Discount and cashback rates are adjustable by the Corporate Treasury, with updates communicated through official channels.

There are no restrictions on the transferability of CTC Tokens acquired by users through public phases (Private Sale, Liquidity Pool, CEX listings, airdrops). Strict internal operational restrictions only apply to Corporate Treasury and Founder allocations.

More detailed information about services offered and ways for users to benefit them through buying or holding CTC Token is reported in part D.7, while information about Corporate Treasury and its management rules is reported in part D.10.

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

CTC Token distribution is structured in multiple phases:

1. Private Sale – up to 420,000 CTC (2% of total supply) offered at a fixed price of 0.005 USDC/CTC, with a maximum purchase limit of 20,000 CTC per participant.
2. Liquidity Pool Launch – 1,890,000 CTC (9% of total supply) paired with USDC on Raydium, a decentralized trading platform on Solana. Initial pool price: ~0.00476190 USDC/CTC. LP tokens will be permanently burned to ensure liquidity permanence.
3. Future CEX Listing – up to 3,150,000 CTC (15% of total supply), subject to meeting exchange listing requirements. Listing is subject to the written consent of the person responsible for drawing up the White Paper, in accordance with Article 4(7) of Regulation (EU) 2023/1114.
4. Airdrops – three separate airdrop events (24% of total supply in total) to reward long-term holding, community engagement, and service usage.

The offer is aimed initially at individuals with basic knowledge of crypto-asset management (Private Sale and DEX phases), then progressively at retail and institutional investors as the project matures and listings expand. CTC Token is not backed by assets or guaranteed returns, and its value is determined solely by market demand and supply.

Complete and graphic information about CTC Tokenomics is reported in part F.6.

A. INFORMATION ABOUT THE OFFEROR OR THE PERSON SEEKING ADMISSION TO TRADING

1. Name

ChartTower Corp.

2. Legal form

OÜ

3. Registered address

Harju maakond, Tallinn, Lasnamäe linnaosa, Ruunaoja tn 3, 11415

4. Head office

Harju maakond, Tallinn, Lasnamäe linnaosa, Ruunaoja tn 3, 11415

5. Date of the registration

2025-07-23

6. Legal entity identifier

Not applicable – *LEI will be required and duly provided by 23 December 2025, in line with the entry into force of the relevant obligation under Delegated Regulation (EU) 2025/421*

7. Another identifier required pursuant to applicable national law

17288413 (*Estonian company registration number*)

8. Contact telephone number

+372 5216070 (*Nomad Consulting OÜ - Registered Contact Person pursuant to Estonian law*)

9. E-mail address

info@ctc-corp.eu

10. Response time (Days)

5 workdays

11. Identity, business addresses and functions of persons that are members of the management body

Luca Marcialli	CEO Real Estate Division; Chief Administrative Officer
Andrea Cascino	CEO Finance & Investments Division; Chief Marketing Officer
Thomas Tapella	Chief Technology Officer

12. Business activity

Real Estate, trading, investment, software.

13. Newly established

True

14. Financial condition for the past three years

Not applicable (*company founded one week before first notification of this crypto-asset white paper*)

B. INFORMATION ABOUT THE ISSUER

Whole B part is not applicable, as the Issuer is the same legal person as the Offeror mentioned in part A.

C. INFORMATION ABOUT THE OPERATOR OF THE TRADING PLATFORM IN CASES WHERE IT DRAWS UP THE CRYPTO-ASSET WHITE PAPER

Whole C part is not applicable, as at the moment the listing on any trading platform under Regulation (EU) 2023/1114 is not required.

D. INFORMATION ABOUT THE CRYPTO-ASSET PROJECT

1. Crypto-asset project name

CTC Ecosystem

2. Crypto-asset name

CTC Token (DTI will be required and duly provided by 23 December 2025, in line with the entry into force of the relevant obligation under Delegated Regulation (EU) 2025/421)

3. Abbreviation

CTC (DTI will be required and duly provided by 23 December 2025, in line with the entry into force of the relevant obligation under Delegated Regulation (EU) 2025/421)

4. Crypto-asset project description

ChartTower Corp. is developing an integrated business ecosystem that combines Real Estate and Finance & Investments services under a unified operational model. The project's goal is to create a sustainable circular economy where revenues, client benefits, and corporate operations are interconnected, leveraging blockchain technology to ensure transparency, traceability, and efficiency (see D.10).

The ecosystem will offer a broad range of professional services: in Real Estate, from property construction and renovation to portfolio management and investment partnerships; in Finance & Investments, from software trading solutions and market analysis to tailored asset management and consultancy (see D.7).

Blockchain integration enables streamlined payment solutions, incentive programs, and potential future on-chain services, while strict treasury and operational policies are designed to foster long-term stability.

5. Details of all natural or legal persons involved in the implementation of the crypto-asset project

The implementation and management of the crypto-asset project are carried out exclusively by ChartTower Corp. OÜ (private limited company, registered in Estonia under registration code 17288413, with registered office at Ruunaoja tn 3, 11415 Tallinn, Estonia). No other natural or legal persons are involved in the implementation of the project.

6. Utility Token Classification

True

7. Key Features of Goods/Services for Utility Token Project

Real Estate Division: The Real Estate division will progressively develop a portfolio of services including property construction and renovation, project management, architectural design, and tailored investment collaborations. The rollout will follow a phased approach, starting with internal operations and pilot projects, then expanding to

client-facing services as the corporate structure consolidates and operational capacity grows.

Offer of services has been divided into 3 phases, summarized in a synthetic and non-exhaustive way below:

Phase 1 – internal real estate operation (expected rollout time: within 6 months): In the initial phase, the Real Estate Division will focus on structuring itself and consolidating its strategies and internal organization before offering high-quality services to clients. The first step will be to build a starting property portfolio. In parallel with the development of the CTC Token, which is expected to bring visibility and capital inflows into the Corporate Treasury, the objective is to initiate targeted acquisitions, either aimed at generating passive income or at resale following value-enhancing renovations. During this phase, no specific services will be offered to clients, with the sole exception of the final sale (or rental) of the properties.

Phase 2 – services to clients (expected rollout time: 1-2 years): After consolidating its strategies and organizational structure through the management of its own properties, ChartTower Corp. plans to begin offering specific services to clients that go beyond the simple sale or rental of its real estate assets. Below is a preliminary and non-exhaustive list of services the Company expects to provide: Renovation or new construction of residential and non-residential buildings on behalf of clients; Construction Site Management; Architectural and technical Design; Service Management; 1-to-1 Consulting, in-person or remotely; Investment partnerships and customized real estate portfolio management for individuals or companies with significant assets, seeking a competent and reliable partner.

Phase 3 – Tokenized Real Estate (expected rollout time: more than 3 years): Once the company is fully structured from every operational and legal standpoint, plan to develop custom-programmed systems tailored to our needs. At this stage, this phase is just a concept and has still to be fully designed and developed, aligning with all regulation involved. It will be our vision about how to empower Tokenized RWA (Real World Assets) on blockchain technology.

Finance & Investments Division: The Finance & Investments division will gradually introduce a range of financial and trading services, starting with market analysis, trading signal provision, and software trading solutions, and evolving towards customized portfolio management and advanced consultancy. The implementation of advanced services in later stages will be subject to obtaining all necessary regulatory licenses, ensuring compliance with applicable financial legislation while progressively integrating blockchain-based tools to enhance transparency, efficiency, and user engagement.

List of expected services to be provided is reported below:

Signal room (expected rollout time: less than 30 days): This delivery phase of services will involve the creation of multiple Signals Rooms, powered manually and/or in an automated way with various types of information, organized according to category. Some examples of provided signals could be: long or mid-term market analysis; relevant financial and investment news; sector related updates or curiosities; trading signals.

Expert Advisors (EA) (expected rollout time: less than 30 days): Expert Advisors are automated software programs that execute trading operations on behalf of the user. It operates based on pre-set rules that follow a specific investment strategy, and it can analyze the market, open and close trades independently, without the need for any manual intervention. In addition to the great advantage of eliminating emotional bias, unlike human traders, EA offers an exceptional feature: backtesting. Since they operate based on fixed parameters and without discretion, once configured, they can test the current settings and strategy against historical data, simulating its performance as if it had been running in previous years. This allows for evaluation of its theoretical performance and fine-tuning in case of unsatisfactory results. EA can be considered a software tool to empower clients' trading performance and also make their operations less impactful in terms of time needed.

Custom spot portfolio creation or rebalancing and specific consulting and training (expected rollout time: few years): In a later development phase, ChartTower Corp. plans to introduce advanced client services in the Finance & Investments Division, such as customized portfolio solutions and personalized consulting. These offerings are designed to provide tailored financial guidance, portfolio structuring or rebalancing, and, where applicable, one-to-one training to help clients improve their financial knowledge and autonomy. The rollout of such services is expected to be gradual and subject to the obtainment of the necessary regulatory authorizations. Until the appropriate licenses are secured, these services remain planned for future implementation and are presented here solely as an indication of the Company's intended direction.

Integration with CTC Utility Token: when a client requires any of services mentioned above, it will be always possible to take advantage of one of the two following Utility Token mechanisms:

- Percentage discount for payment made with CTC Token
Example: client must pay 1.000,00 € for a certain service, and choose CTC Token as payment method, with 5% current discount percentage → 950,00 € paid with CTC Token
- Percentage cashback for payment made with fiat currency
Example: client must pay 1.000,00 € for a certain service, and choose fiat currency as payment method, with 5% current CTC Token cashback percentage → 1.000,00 € paid with fiat currency; 50,00 € of CTC Token transferred to the client as cashback

Percentage management mechanism: the two Utility Token potential advantages are in some way inversely proportional, and percentages will always be variables: if Corporate Treasury needs to increase its CTC Token stock, discount percentage will be increased and cashback percentage will be decreased, to push client into the desired option; at the same way, if Corporate Treasury needs to decrease its CTC Token stock, discount percentage will be decreased and cashback percentage will be increased.

These percentages, as variable and not fixed, will be always available and clearly visible on our website, starting from Liquidity Pool launch date.

8. Plans for the token

Past milestones of CTC Token already accomplished:

Tokenomics development; CTC Token development on Solana testnet and devnet; website development; preliminary corporate analysis (choice of geographical jurisdiction, company legal form, etc); MICA preliminary study.	1° semester of 2025
Private Sale (starting date)	2025-06-03
Estonian E-Residency obtaining	2025-07-17
CTC Token deploy on Solana mainnet	2025-07-19
Company registration	2025-07-23
CTC Token White Paper first Notification	2025-07-31

Future milestones of CTC Token with scheduled time of accomplishment:

Finance & Investment Division phase 1 services rollout (see D.7)	2025-09
DEX Liquidity Pool launch	2025-11-04
Real Estate Division phase 1 rollout (see D.7)	2025-10 / 2026-02
1° Airdrop	2026-01 / 2026-06
Real Estate Division phase 2 services rollout (see D.7)	2° semester of 2026
CEX listing (depending from many factors which are not under our control)	Expected between 2026 and 2027
2° Airdrop	6 – 18 months from 1° CEX listing above
3° Airdrop	To be defined
CASP license obtaining under MICA (or equivalent license under MIFID II regulation)	Expected between 2026 and 2027
Finance & Investment Division phase 2 services rollout (see D.7)	Depending on license above
Real Estate Division phase 3 services rollout (see D.7)	Expected not before 2027 / 2028

9. Resource allocation

Resources already allocated to the project primarily consist of founders' equity, the development of the tokenomics framework, corporate registration in Estonia, and the setup of core technical infrastructure. The Company will continue to rely mainly on internal funding and, where applicable, external financing agreements. Future allocation of resources will prioritize: development of all technical tools necessary for CTC Tokenomics (airdrops); deployment of infrastructure required for the Finance & Investments services; gradual build-up of the Real Estate Division framework; obtaining operative license as CASP under Regulation (EU) 2023/1114 (or equivalent license under MiFID II framework).

10. Planned use of Collected funds or crypto-Assets

Funds and crypto-assets collected from CTC Token offers will be used for general corporate purposes, for example: marketing, software implementation, legal and/or administrative expenses, smart contracts audit.

11. Corporate Treasury operational and liquidity conditions

CTC Tokenomics (see F.6) includes a 38% allocation which will remain under the control of ChartTower Corp. OÜ.

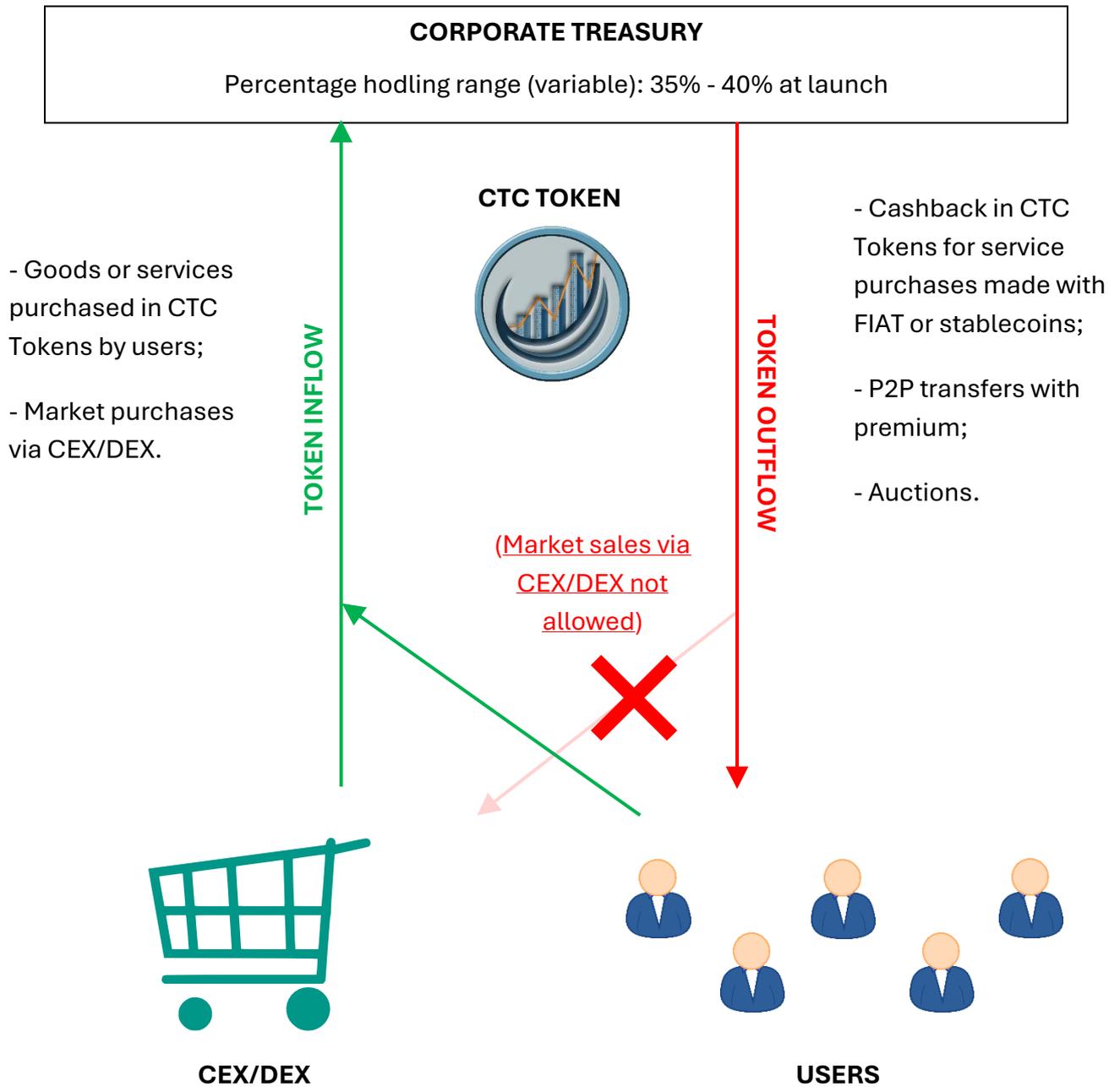
The Company is fully committed to operate under very strict conditions, which are outlined below:

- **Absolute prohibition of market selling: Treasury will NEVER be allowed to sell on the open market via CEX or DEX;**
- **Direct sales:** The Company reserves the right to carry out direct P2P sales, under the following conditions:
 - Maximum number of CTC Tokens transferable: 100,000 (approximately 0.5% of the total supply) per each sale operation;
 - Specific Sale Agreement must be drafted and signed, and must be made publicly available in all its parts - where possible and in compliance with privacy regulations;
 - Sale price must include a premium of at least 10% compared to the average of the daily opening price over the last 30 days at the time the Agreement is signed;
 - The sale limit may be increased to 150,000 Tokens, provided that the premium over the average price (as defined above) is at least 20%;
 - At least 50% of the Tokens sold must be retained by the Company for a minimum period of 12 months from the date of purchase. Interest may be granted in CTC Tokens for the agreed lock-up periods;

- Auction: The Company reserves the right to auction CTC Tokens, up to a maximum of 200,000 Tokens per procedure (approximately 1% of the total supply). The starting auction price must be equal to or higher than the average daily opening price over the past 30 days at the time the auction is published (price calculation method similar to the previous point, without requiring a percentage premium);
- Cashback: users who purchase goods or services using FIAT currency or stablecoins will be entitled to a proportional cashback in CTC Tokens, based on variable criteria that will always be published through our official channels and corporate documentation (see D.7);
- Discounts: users who purchase goods or services using CTC Tokens will be entitled to certain discounts, based on variable criteria that will always be available through our official channels and corporate documentation (see D.7);
- Circulating supply control: a percentage range of CTC Token supply that the Corporate Treasury MUST retain is established. This range will always be available on our official channels and documentation and will be updated over time to ensure the health of the Circular Economy. At the time of launch, the Corporate Treasury holds 38% of the total supply, and the parameters set are: minimum 35%, maximum 40%;
- As the total circulating supply progressively increases (see Tokenomics in part F.6), and assuming the ecosystem grows sustainably, the above range will be gradually reduced to ensure progressive decentralization (we will not maintain the same percentage share of Token supply in the Corporate Treasury if the total market capitalization reaches significant dimensions);
- Market purchases: the Corporate Treasury reserves the right to purchase Tokens on the market at any time, within the limits defined in the previous points;
- Reporting obligation: the Corporate Treasury commits to publishing financial reports of its operations every 1, 2, or 3 months, at its discretion, covering both Real Estate and Finance & Trading divisions. These partial reports may be skipped if no operations or earnings occurred during the reporting period;
- **BTC Accumulation Plan (PAC)**: **Following the example of other major and reputable market operators, the Company intends to implement a BTC accumulation plan, committing to purchase, within 15 days of publishing each Financial Report (as described in the previous point), an amount of BTC equivalent to between 2% and 5% of its net profit for the corresponding period;**
- **Spot purchases/sales**: **One-off spot transactions involving BTC and ETH may be considered, completely independent from the above-mentioned PAC, if the Company deems it necessary or appropriate based on current market conditions, in presence of potentially profitable buying or selling opportunities;**

Graphical Representation of the Circular Economy:

Below is a graphical diagram that summarizes the functioning of the Circular Economy:



Methodology for managing Corporate Treasury CTC Token inflows and outflows:

The Corporate Treasury, in compliance with the previously outlined operational and liquidity conditions, will make the best possible decisions to regulate token inflows and outflows, thereby maintaining balance in the centralized control of the CTC Token supply.

Below is a summary of how the Corporate Treasury may exercise this control to support Token price and value, and foster its long-term stability:

- When the percentage of CTC Token supply held by the Corporate Treasury increases and approaches the upper limit of the current predefined range:
 - Increase of cashback percentage in CTC Tokens granted to users purchasing goods or services with FIAT currency or stablecoins;
 - Decrease of percentage discounts applied to users who pay directly with CTC Tokens for goods or services;
 - Possible P2P sales with a premium over the average opening price of the last 30 days – as mentioned in operational and liquidity conditions;
 - Possible auctions, based on the average price calculated using the above-mentioned method, without premium;
 - Direct market sales via DEX or CEX are strictly prohibited, in accordance with the operational and liquidity conditions previously defined.
- When the percentage of CTC Token supply held by the Corporate Treasury decreases and approaches the lower limit of the current predefined range:
 - Decrease of cashback percentage in CTC Tokens granted to users purchasing goods or services with FIAT currency or stablecoins;
 - Increase of percentage discounts applied to users who pay directly in CTC Tokens for goods or services;
 - Possible direct market purchases via DEX or CEX, executable at any time.

E. INFORMATION ABOUT THE OFFER TO THE PUBLIC OF CRYPTO-ASSETS OR THEIR ADMISSION TO TRADING

1. Public offering or admission to trading

OTPC - offer to the public

2. Reasons for the offer to the public or for seeking admission to trading

The offer and subsequent admission to trading aim to support the creation of a fully transparent and regulated ecosystem operated by ChartTower Corp. The phased

distribution of CTC Token is designed to progressively engage different categories of users, ensure broad accessibility to the services within the ecosystem, and demonstrate long-term compliance with the MiCA framework and other applicable regulations.

3. Fundraising target

2100 USDC (Private Sale)

4. Minimum subscription goals

None

5. Maximum subscription goals

420000 CTC

6. Oversubscription acceptance

False

7. Issue price

0.005

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

USDC – DTI 5R3XFPZSM (Solana Blockchain)

9. Subscription fee

1 USDC

10. Offer price determination method

Once CTC Token will be admitted to trading, its price will be fully determined by demand and supply (buyers and sellers).

Since public trading will start after the end Private Sale, we have decided to fix Private Sale price (**0.005 USDC/CTC**) by reference to the planned Liquidity Pool launch parameters, which are predefined. Liquidity Pool launch price, which is determined by the decentralized platform, corresponds to the ratio between CTC Tokens and USDC allocated to the pool at its start, rounded up to eliminate extra decimal digits.

Detail about how Raydium liquidity pools determinate token price:

For CTC Token specific use case, where the issuer will burn LP Tokens to ensure that provided liquidity will always stay in the Liquidity Pool and cannot be withdrawn, the best choice is to use a Standard AMM model (Constant Product Market Maker, or CPMM), which relies on the formula:

$$\text{CTC amount} * \text{USDC amount} = K$$

Where:

CTC = number of CTC Token in the pool;

USDC = number of USDC in the pool;

K = constant product.

In such systems, the price of an asset is not manually set, but emerges as the ratio between the two assets:

$$\text{Starting price} = \text{USDC} / \text{CTC} = 9000 / 1890000 = 0.00476190 \text{ USDC for 1 CTC}$$

This mechanism guarantees that the market price is transparently derived from the actual on-chain liquidity, without any central intervention.

In the Private Sale, the offer price was fixed at 1 CTC = 0.005 USDC, rounded up to facilitate pricing transparency and simplicity for participants.

Standard AMM liquidity pool model does not maintain a fixed price: instead, it dynamically adjusts the spot price with each transaction. The price evolution follows a logarithmic curve, meaning that even relatively small trades can move the market price, especially in the early stages when liquidity is limited. This makes the difference between Private Sale and starting Liquidity Pool prices negligible for both investors of Private Sale and Liquidity Pool.

11. Total number of offered/traded crypto-assets

420000 CTC (Private Sale)

12. Targeted holders

All

13. Holder restrictions

None

14. Refund mechanism

E-mail request within 14 days from the purchase, as mentioned in Article 13 of Regulation (EU) 2023/1114. E-mail should contain as many information as possible, to make refund process faster. Useful information would be for example: e-mail address used for

registration, public key (wallet) used to make USDC payment, number of CTC Token purchased.

15. Refund timeline

5 workdays

16. Offer phases

Below is a summary list of all offering phases in a chronological order, which are better detailed in point F.6 "Crypto-asset characteristics":

Phase	% of supply	Token amount	Brief description
Private Sale	2%	420000	Made before start of public negotiation, at fixed price based on Liquidity Pool launch price.
Liquidity Pool	9%	1890000	First phase of public negotiation, made on Raydium DEX. Launch price is not manually set but emerges as the ratio between the two assets into the two pools (CTC + USDC). More details about price determination method are available at point E.10.
1° Airdrop	4%	840000	Allocation of free Tokens which will be delivered to users using a reward mechanism through multiple-choice quizzes or other types of interactive mechanisms.
CEXs listing	15%	3150000	Starting of negotiation on authorized trading platforms, which do not require specific competence for users. Timeline is not predictable at this stage, as CEXs require very strict minimum conditions before listing.
2° Airdrop	10%	2100000	Allocation of free Tokens structured to incentivize holding by users, through a smart contract which will take snapshots of CTC Token balances. Higher rewards will be allocated to users who hold during period since Liquidity Pool launch to first CEX listing.
3° Airdrop	10%	2100000	Allocation of free Tokens structured in a similar way to previous Airdrop. Higher rewards will be allocated to users who hold during period after first CEX listing.

17. Time-limited offer

5 months

18. Subscription period beginning

2025-06-03

19. Subscription period end

2025-11-03 (CTC Token available for this stage will end much earlier)

20. Safeguarding arrangements for offered funds/crypto-Assets

Funds will be held to a registered CASP, in full compliance with art. 10(3)(b) MiCA regarding safeguarding obligations.

21. Payment methods for crypto-asset purchase

USDC on-chain transfer on Solana blockchain for Private Sale (*exempt*); External trading platforms (DEXs/CEXs) for subsequent phases.

22. Value transfer methods for reimbursement

USDC on-chain transfer on Solana blockchain for Private Sale (*exempt*)

23. Right of withdrawal

Present, pursuant to Article 13 of Regulation (EU) 2023/1114, within 14 days from the date of purchase. (*see part E.14 for information about modalities of withdrawal request*)

24. Transfer of purchased crypto-assets

For Private Sale: on-chain transfer on Solana blockchain, to purchasers' public key (wallet) indicated during purchase application.

25. Transfer time schedule

For Private Sale: transfer within 15-30 days from Liquidity Pool launch date, which has still to be defined as it depends on successful crypto-asset White Paper notification.

26. Special notice pursuant to Annex I, part E(7) MiCA

Purchasers participating in the Private Sale will be able to be reimbursed if the minimum target subscription goal is not reached at the end of the offer to the public, if they exercise the right to withdrawal foreseen in Article 13 (*part E.23*) or if the offer is cancelled. Detailed description of the refund mechanism and expected timeline of when such refunds will be completed are the same mentioned in Parts E.14 and E.15.

27. Purchaser's technical requirements

Sufficient specific competence for self-custody of crypto-asset and to carry out on-chain transactions on Solana blockchain.

28. Placement form

NTAV (Not applicable)

29. Involved costs

Other than the subscription fee mentioned in part E.9, the only additional costs investors may incur to participate in the Private Sale are the fees to purchase USDC and to make the crypto-transfer of the intended total USDC amount to acquire CTC Tokens.

30. Conflicts of interest

Potential conflicts of interest may arise from the dual role of the Founders as both managers of ChartTower Corp. OÜ and holders of a portion of the CTC Token supply. To mitigate such situations, strict self-imposed operational restrictions are in place, including voluntary lock-ups, prohibition of direct market sales from the corporate Treasury, and transparent disclosure of all relevant wallet addresses. All token allocations and related transactions will be conducted in line with the rules set out in the Tokenomics and made publicly verifiable on-chain.

For full transparency, the extended version of the White Paper, containing additional project details, operational processes, and background information, will remain permanently available through official channels, and should be read in conjunction with this version, which is prepared for registration and compliance with the MiCA framework.

31. Applicable law

Applicable law: Estonian law, in accordance with Regulation (EU) 2023/1114 on Markets in Crypto-Assets (MiCA).

32. Competent court

Competent court: Harju County Court (Harju Maakohus), Tallinn, Estonia.

F. INFORMATION ABOUT THE CRYPTO-ASSETS

1. Crypto-asset type

Crypto-asset other than asset-referenced token or e-money token, specifically utility Token used to access services and benefits in the Real Estate Division and Finance & Investment Divisions of the Issuer (ChartTower Corp. OÜ)

2. Crypto-asset functionality

CTC Token grants access to core services, reward mechanisms, and platform utilities across the issuer's ecosystem, including investment-related features and real estate services.

3. Planned application of functionalities

Basic functionalities, like wallet transferability and possibility to use CTC Token as payment method for ChartTower Corp. ecosystem's services, are effective immediately upon the public launch (Liquidity Pool on DEX). Advanced functionalities related to the Finance & Investments and Real Estate Divisions will be introduced progressively, in line with regulatory approvals and phased platform rollout. Further information can always be found on Roadmaps available on our website.

4. Type of crypto-asset white paper

OTHR (*White Paper for crypto-assets other than asset-referenced or e-money tokens*)

5. Type of submission

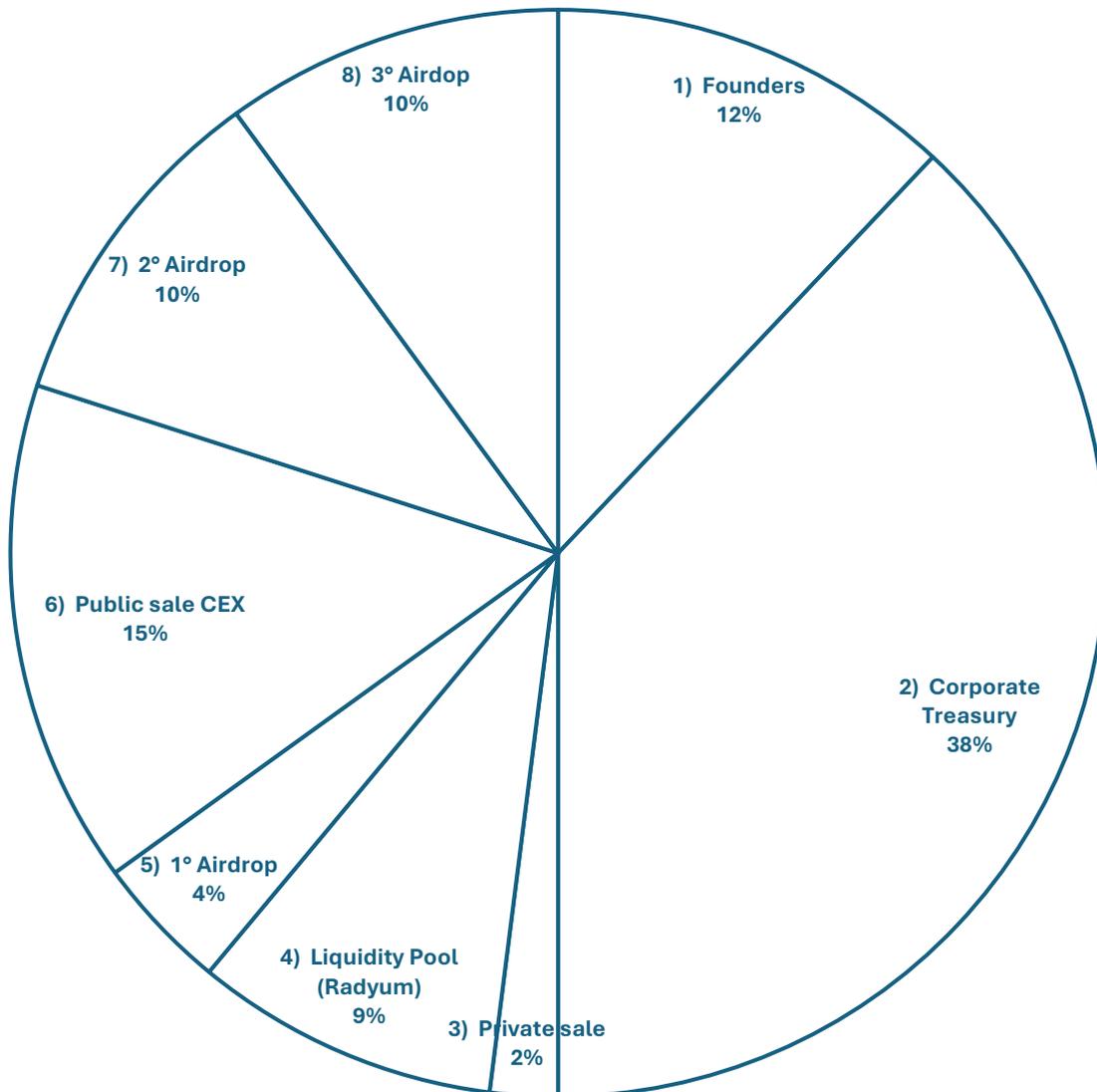
NEWT (*first submission*)

6. Crypto-asset characteristics

CTC Token is a native utility token issued on Solana blockchain (consensus mechanism combining Proof of History and Proof of Stake). It has a fixed total supply (capped supply), with no programmed variation mechanisms. The initial distribution foresees allocations to the Founders and to the Corporate Treasury, with self-imposed usage constraints and progressive unlocking. The token is intended to be used through self-custodial wallets, and its initial market access will occur via liquidity pools on decentralized platforms. From inception, the token has been designed to fall under the MiCA framework as a utility token and not as an ART or EMT.

Below is the total supply of the Token, along with a breakdown of its allocation for different purposes presented through a chart, as well as a brief description of all the unlocking/issuance phases of the Tokens:

TOTAL SUPPLY: 21.000.000 CTC (*CAPPED SUPPLY*)



Details of allocation phases:

- 1) **Founders** (12% of total supply = 2.520.000 CTC): share of Tokens allocated to the Founders, which will therefore be excluded from corporate management and may be managed directly. These Tokens will not be subject to the “Corporate Treasury operational and Liquidity Conditions” outlined in part D.10. A dedicated wallet will be created for this portion of the supply, and its public key will be promptly shared to allow on-chain monitoring at any time. As further detailed in the following section regarding the Corporate Treasury, this

portion of the supply will also be subject to token locking, with progressive unlocking according to the following schedule:

- 2% of total supply (420.000 CTC) immediately transferable from the dedicated wallet mentioned above, to cover part of the initial launch expenses of the project (marketing, compliance, software development, etc.);
 - 3% of total supply (630.000 CTC) transferable 12 months after the launch of the Liquidity Pool on Raydium (see phase 4);
 - 3% of total supply (630.000 CTC) transferable 24 months after the launch of the Liquidity Pool on Raydium (see phase 4);
 - 4% of total supply (840.000 CTC) transferable 36 months after the launch of the Liquidity Pool on Raydium (see phase 4).
- 2) **Corporate Treasury** (38% of total supply = 7.980.000 CTC): this quote of Tokens will remain under the control of the company structure. As with the portion of Tokens reserved for the Founders mentioned in the previous point, a dedicated wallet will be created for this supply share, and its public key will be promptly shared to enable on-chain monitoring. The methods and criteria by which the Treasury will manage the Tokens are further detailed in part D.10.
- 3) **Private Sale** (2% of total supply = 420.000 CTC): a reduced percentage of the total supply is allocated to this issuance phase, in order not to excessively dilute the liquidity conditions of the Liquidity Pool described in the following point 4. However, it was decided to include this phase to give early adopters the opportunity to gain exposure to CTC Token before the public listing. More information about this phase of sale could be found in section E “Information about the offer to the public of crypto-assets or their admission to trading”.
- 4) **Liquidity Pool on Raydium DEX** (9% of total supply = 1.890.000 CTC): A liquidity pool pair will be created, consisting of CTC Tokens and USDC, funded by the Founders. The ratio between the amount of USDC and the portion of CTC Token supply allocated to the LP will determine the initial listing price. More information about this phase of sale could be found in section E “Information about the offer to the public of crypto-assets or their admission to trading”.
- 5) **1° Airdrop** (4% of total supply = 840.000 CTC): there will be an opportunity to obtain tokens free of charge through an Airdrop mechanism, which will be further detailed in future updates of this White Paper, but in any case, in compliance with the following conditions:
- The Airdrop will feature a reward mechanism that will incentivize knowledge of the project in its various aspects;
 - It will be carried out through multiple-choice quizzes or other types of interactive mechanisms that make the experience enjoyable and

rewarding — not only by granting free CTC Tokens, but also by educating participants about the project and the crypto world in general;

- Users will also be asked to provide feedback and suggestions, and those submitting the most valuable proposals will receive greater rewards;
- From a timing perspective, the Airdrop will take place between 3 and 9 months after the launch of the Liquidity Pool on Raydium, and the exact date will be announced with adequate notice.

6) **Public listing on CEX** (15% of total supply = 3.150.000 CTC): this portion of CTC Token supply is allocated for future listings on centralized exchanges (CEXs). As this is a process influenced by numerous variables and considering that CEX platforms often require certain conditions to be met before allowing a listing (for example minimum daily or monthly trading volume), no specific timeframe for the listing is set at this stage. The Founders commit, starting from the launch of the Liquidity Pool on Raydium as described in point 4, to take all necessary actions to achieve this important milestone as quickly as possible. Further details will be shared progressively.

7) **2° Airdrop** (10% of total supply = 2.100.000 CTC): This mechanism will necessarily be implemented following the public listing on the first CEX, as described in point 6. The exact timing will be defined at a later stage but is currently estimated to occur between 6 and 18 months after the first CEX listing. Details regarding how it will function will also be finalized later, but will be defined according to the following guidelines:

- The Airdrop will be managed through a smart contract that we will develop, which probably with the help of an Oracle, will analyze the average balances of wallets holding CTC Tokens over specific time periods;
- Once the “snapshots” are taken, smart contract will calculate the reward for each user based on parameters we will provide and publish before the screening process is executed;
- The parameters will prioritize and give more rewards for holding period from the initial launch of the Token (Liquidity Pool in point 4) up to the day of public listing on the first CEX (point 6);
- In this Airdrop phase, a bonus reward will be allocated to users who purchased Tokens during the Private Sale described in point 3: they will receive a bonus quantity of Tokens ranging from 5% to 15% of the amount originally purchased, regardless of whether they continued to hold those Tokens afterward.

8) **3° Airdrop** (10% of total supply = 2.100.000 CTC): this final Airdrop will operate similarly to the previous one (point 7), also based on parameters defined by us that will be communicated at a later stage, but this time giving priority and greater

rewards to the holding period of the CTC Token following the public listing described in point 6.

7. Commercial name or trading name

ChartTower Corp. OÜ

8. Website of the issuer

<https://ctc-corp.eu/>

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

2025-11-04 (*intended date of Liquidity Pool Launch, first phase of public negotiation*)

10. Publication date

2025-10-28 (*20 workdays after successful White Paper notification*)

11. Any other services provided by the issuer

Real Estate, trading, investment, software.

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

ENG

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

Not applicable (*DTI will be required and duly provided by 23 December 2025, in line with the entry into force of the relevant obligation under Delegated Regulation (EU) 2025/421*)

14. Functionally fungible group digital token identifier, where available

Not applicable (*FFG-DTI will be required and duly provided by 23 December 2025, in line with the entry into force of the relevant obligation under Delegated Regulation (EU) 2025/421*)

15. Voluntary data flag

True

16. Personal data flag

True

17. LEI eligibility

True

18. Home Member State

Estonia

G. INFORMATION ON THE RIGHTS AND OBLIGATIONS ATTACHED TO THE CRYPTO-ASSETS

1. Purchaser rights and obligations

CTC Token holders are granted the right to access services and benefits within the issuer's ecosystem as utility users. Tokens do not confer ownership rights, dividends, voting power, or governance participation. Purchasers are responsible for the lawful use of tokens

2. Exercise of rights and obligations

Rights linked to CTC Tokens are exercised exclusively through blockchain transactions on the Solana network, using self-custodial wallets compatible with the token standard. Access to services within the issuer's ecosystem will be enabled through token ownership and validated by smart contracts, ensuring automated and transparent execution. Compliance with applicable laws and platform terms remains the purchaser's responsibility.

3. Conditions for modifications of rights and obligations

The rights and obligations linked to CTC Tokens are not subject to unilateral modification by the Issuer. As a core guarantee, CTC Tokens will always be accepted by the Issuer as a method of payment for its services. Any future evolution will occur exclusively through the introduction of additional services, without altering the fundamental acceptance and use of the token.

4. Future public offers

No further pre-defined public sale phases are planned beyond those described in the Tokenomics. The Corporate Treasury is subject to a self-imposed restriction preventing

any direct sale of tokens on CEXs/DEXs. Any future transfer of Treasury tokens may only occur through over-the-counter (OTC) agreements, executed with full transparency and based on pre-defined price calculation mechanisms; or auction mechanisms, once implemented, also subject to pre-defined and transparent pricing rules.

5. Issuer retained crypto-assets

7980000 (given amount considering ChartTower Corp. as issuer, excluding 12% Founder quote)

6. Utility token classification

True

7. Key features of goods/services of utility tokens

Real Estate Division: The Real Estate division will progressively develop a portfolio of services including property construction and renovation, project management, architectural design, and tailored investment collaborations. The rollout will follow a phased approach, starting with internal operations and pilot projects, then expanding to client-facing services as the corporate structure consolidates and operational capacity grows.

Finance & Investments Division: The Finance & Investments division will gradually introduce a range of financial and trading services, starting with market analysis, trading signal provision, and software trading solutions, and evolving towards customized portfolio management and advanced consultancy. The implementation of advanced services in later stages will be subject to obtaining all necessary regulatory licenses, ensuring compliance with applicable financial legislation while progressively integrating blockchain-based tools to enhance transparency, efficiency, and user engagement.

More detailed information about offered services is available in part D.7

8. Utility tokens redemption

CTC Tokens can be redeemed for goods or services using them as method of payment.

9. Non-trading request

False

10. Crypto-assets purchase or sale modalities

Liquidity Pool on Raydium (DEX) will be launched as soon as possible after the end of White Paper notification process, and users will be able to buy and sell CTC immediately after the launch.

11. Crypto-assets transfer restrictions

None

12. Supply adjustment protocols

False

13. Supply adjustment mechanisms

Not applicable

14. Token value protection schemes

False

15. Compensation schemes

False

16. Applicable law

Applicable law: Estonian law, in accordance with Regulation (EU) 2023/1114 on Markets in Crypto-Assets (MiCA).

17. Competent court

Competent court: Harju County Court (Harju Maakohus), Tallinn, Estonia.

H. INFORMATION ON THE UNDERLYING TECHNOLOGY

1. Distributed ledger technology (DTL)

Solana

2. Protocols and technical standards

CTC Token has been issued through Solana's Token Program, which is part of the Solana Program Library (SPL). Tokens created under this framework are commonly known as SPL-tokens. Unlike a standalone smart contract, an SPL-token is structured as a data account on Solana. Data accounts are designed to store information on-chain but cannot execute operations directly. All interactions with an SPL-token are therefore processed via the Solana Token Program. The Token Program is implemented in Rust, Solana's primary on-chain programming language, chosen for its memory-safety and performance. Rust's design ensures security and efficiency in the development of decentralized applications (dApps) and underpins the reliability of SPL-based tokens on the Solana blockchain.

3. Technology used

CTC Tokens operate on the Solana blockchain and leverage its native infrastructure to ensure secure and efficient transactions.

- **Wallet Compatibility** – The token is supported by all Solana-compatible wallets integrated with the SPL Token Program.
 - **Decentralized Ledger** – All transactions are recorded on Solana's decentralized ledger, providing immutability, transparency, and traceability of ownership.
 - **SPL Token Program** – The token is managed via Solana's built-in Token Program, an open-source smart contract forming part of the Solana Program Library (SPL). Unlike Ethereum's ERC-20 model, the Solana approach ensures a uniform token standard across the network.
 - **Scalability** – Solana's design allows for high throughput and low transaction fees, enabling efficient transfers even during periods of elevated network activity.
 - **Security** – Token operations are safeguarded by private key management at the user level and by Solana's use of elliptic curve cryptography, ensuring robust integrity of transactions and asset custody.
-

4. Consensus mechanism

The Solana blockchain operates under a hybrid consensus model combining Proof of History (PoH) with Proof of Stake (PoS). This design enables high throughput and low-latency validation, while maintaining decentralization and network security.

5. Incentive mechanisms and applicable fees

The Solana network applies standard transaction fees, which are typically very low and are paid in SOL, the native token of the blockchain. No additional incentive mechanisms or custom fees are applied to the use or transfer of CTC Tokens.

6. Use of distributed ledger technology

False

7. Audit

False

I. INFORMATION ON RISKS

1. Offer-related risks

- **Concentration and early holder risks:** The manner in which CTC Token is initially distributed and traded can pose risks to fair market dynamics. In the private sale phase, there was a possibility that a small number of participants could accumulate an excessive quantity of tokens (becoming “whales”), especially if they had insider knowledge or early access. Such concentration could enable market manipulation or outsized influence on token price. To mitigate this, Private Sale imposed a very low purchase limit per participant, kept the total amount raised modest, and required KYC checks on investors. Additionally, none of the project’s founders were permitted to acquire tokens during the private sale, preventing any insider self-dealing in the initial allocation. These measures reduced the risk of a few insiders controlling a large supply from day one. However, once public trading commences (e.g. via the DEX liquidity pool), there is still a risk that individuals with large capital and possibly privileged information could buy up substantial token amounts. If a few such actors accumulate a large share of CTC, they might impact the market by injecting volatility – for instance, a single large holder selling could crash the price. **Mitigation:** The project recognizes this risk and has voluntarily increased transparency and disclosure (through White Paper Notification under Title II of MiCA and ongoing communications) to level the information field. By making comprehensive information public in advance, the aim is to reduce information asymmetry that could be exploited by early movers. Nonetheless, all token holders should be aware that unequal distribution or information advantages at the time of listing can affect market fairness and token price stability.
- **Limited trading venues and liquidity considerations:** After the token’s initial distribution, CTC is expected to trade primarily on decentralized exchanges (DEXs) (and potentially later on other platforms). Trading on a DEX carries certain risks. DEX liquidity pools rely on users to provide liquidity; at launch, the liquidity may be limited, which can result in high price slippage and volatility. Early on, even moderately sized trades could move the price significantly if order depth is shallow. There is also a risk that trading may be temporarily disrupted if the DEX platform (or

the smart contracts powering it) encounters technical issues or if liquidity providers withdraw funds. Unlike a centralized exchange, there is usually no market maker of last resort on a DEX, so prices can swing rapidly. Moreover, if CTC Token does not get listed on major exchanges or fails to attract a wide user base, the secondary market might remain illiquid. Low liquidity not only makes trading difficult but can also magnify price manipulation – for example, pump-and-dump schemes are easier in illiquid markets.

Mitigation: The project attempts to mitigate this by locking the provided liquidity into the Liquidity Pool (LP tokens will be burned immediately after launch), to ensure a baseline of liquidity. Additionally, auction and/or OTC mechanisms planned for any future sales by the issuer are designed to protect the market price (see conflicts of interest risks in following paragraphs): any sale of tokens from the treasury will occur via controlled auctions with a minimum price not below recent market averages, rather than surprise market dumps. These steps should help maintain more stable trading conditions during the offer and early trading period. However, participants should understand that market liquidity is not guaranteed, and they may not be able to buy or sell at desired prices or timing, especially in the initial phase of trading. (See point G.4 “Future public offers” of this document).

- Market volatility at listing and price discovery: The launch of the liquidity pool on Raydium DEX is a critical moment that involves price discovery by the market. There is an inherent risk that the initial trading price may be very different from the private sale price. Early buyers or insiders might seek to take profits when public trading opens, potentially causing a sharp drop in price. Conversely, hype or unmet demand could spike the price temporarily. In either case, new investors face the risk of buying at an inflated price or experiencing extreme volatility.

Mitigation: The project has taken precautions such as staggered release of private sale tokens (delaying their distribution for a few weeks after trading opens) specifically to avoid an immediate flood of sell orders from early investors. This measure should cushion against an instant post-listing sell-off and allow more organic price stabilization. Nonetheless, once those privately sold tokens enter circulation (and over time as more tokens unlock), increased supply on the market could put downward pressure on the price if not met with equal demand.

2. Issuer-related risks

- Issuer’s stability and track record: The company behind CTC Token (ChartTower Corp. OÜ) is a newly established venture, which means it lacks a long track record. As with any new business, there is a risk that the project could be partially or entirely abandoned or fail to achieve its objectives due to various factors (e.g. lack of public interest, insufficient funding, loss of key team members, or other operational setbacks). The issuer’s limited operating history and financial information make it

difficult to assess its ability to successfully develop and sustain the CTC ecosystem over the long term. This new-venture risk is inherent and could affect the value or viability of the token if the company encounters serious difficulties.

- Dependence on Founders and management: The success of the CTC project relies heavily on the expertise, integrity, and continued commitment of its founders and management team. Loss of key personnel or crucial partners could disrupt the project's development and damage stakeholder confidence. If the leadership fails to execute the business plan or if internal governance is weak, the project may not deliver the expected goods and services to token holders. Negative events (such as reputational issues or association with illicit activity) involving the issuer could also harm the project's image and, by extension, the value of CTC Token.
- Financial and operational constraints: As a young company, the issuer is starting its activity with limited financial resources and is subject to all the uncertainties of a startup venture. There is a risk that the issuer might not raise or maintain sufficient capital to fund the project's roadmap, which could hinder development or expansion plans. For instance, if the proceeds from token sales or other funding are smaller than expected or if operating expenses exceed projections, the issuer's financial stress could negatively impact CTC Token value.

Mitigation: The issuer has self-imposed strict operational rules to sustain trust and align its interests with token holders. Notably, the Corporate Treasury will not sell CTC Tokens directly on any trading platform (CEX/DEX), and the liquidity pool tokens obtained when providing initial DEX liquidity will be permanently burned to lock that liquidity immediately after launch. These measures limit the issuer's ability to "cash out" or withdraw liquidity, thereby reducing the risk of opportunistic behavior that could hurt the token's market. Furthermore, the issuer has voluntarily complied with MiCA disclosure standards, to provide transparent and comprehensive information to the public. While such steps signal commitment to the project's integrity, all issuer-related risks cannot be eliminated – holders still depend on the company's sound management and honest conduct for CTC Token success.

3. Crypto-asset-related risks

- High volatility and loss of value: CTC Token is a utility crypto-asset that has no guaranteed value, and its market price can be highly volatile. The token's value is determined by supply and demand dynamics in the market, which are influenced by factors such as project success, user adoption, market sentiment, and broader crypto-market conditions. There is a significant risk that the token's price may fluctuate dramatically or decline sharply, mostly in first phases of negotiations. In extreme scenarios, CTC Token may lose its value in part or even in full, meaning holders could incur a total loss of their investment. Like many crypto-assets, CTC Token price may experience sudden swings due to speculation or changes in market

sentiment, and no minimum value or return is guaranteed. Holders should be aware that CTC Token exchange rate could drop to zero if the project fails or falls out of favor. Importantly, CTC Token does not represent a claim on any tangible asset or guaranteed entitlement, and it is not backed by any asset or insurance. It is not covered by investor compensation or deposit guarantee schemes that protect customers of regulated financial institutions. This means that if CTC loses value or becomes unusable, holders have no recourse to compensation under those schemes.

- Liquidity and transferability risks: There is no assurance that an active market will develop for CTC Token. Especially in the initial phases of trading, liquidity may be low, so holders might find it difficult to buy or sell large amounts of CTC without significantly affecting the market price. The token's transferability could also be limited by technical or market factors. In adverse conditions, CTC Token may not always be transferable and may not be liquid, meaning holders might not be able to trade their tokens at will. Low liquidity can amplify price volatility and potentially lead to situations where holders are stuck with tokens they cannot easily sell or can only sell at a large discount.
- Speculative valuation and market behavior: The valuation of CTC Token at any given time may not reflect its actual adoption or utility in the ecosystem, but rather speculative demand. A significant portion of the token's value could be driven by future expectations and trading sentiment, which can change rapidly. This means the price might be inflated during periods of hype and could crash if market sentiment turns negative. Factors such as rumors, macroeconomic news, regulatory developments, or trends in the broader cryptocurrency market can all influence CTC's price independently of the project's fundamentals. Additionally, because CTC intends to provide access to services (a utility token), if those services are delayed, limited, or perceived as not valuable, the token's market value could be adversely affected. Market manipulation and abuse is another concern in the largely unregulated crypto markets: tactics like pump-and-dump schemes, spoofing, or insider trading by malicious actors could occur and impact CTC's price fairness.

Mitigation: The project has sought to mitigate pure speculation by designing the tokenomics to reward long-term holding and actual platform use. For example, loyalty airdrops and other incentives will favor users who retain their CTC Tokens and engage with the ecosystem rather than short-term speculators. Token supply and release schedule have been structured to minimize sudden dilution; notably, tokens purchased in the private sale are subject to a delayed release (distribution 15–30 days after the launch of the liquidity pool) to prevent an immediate sell-off when public trading begins. These measures aim to reduce volatility and encourage a stable token holder base, but they cannot eliminate the fundamental volatility and speculative nature of crypto-asset markets. CTC Token holders must be prepared

for significant price uncertainty and the possibility of losing a substantial portion or all of their token's value.

- Fraud, scam, and security risks for token holders: As with any crypto-asset, CTC Token holders are exposed to risks of fraud and cybercrime that could lead to loss of their tokens. Holders may be targeted by phishing attempts, fake websites or support channels, bogus “airdrop” giveaways, or other scams impersonating the project. There is also the risk of fake CTC tokens or unofficial sales being promoted by third parties – investors should only trust official communication channels to avoid these scams. Additionally, if holders do not securely manage their private keys or wallet credentials, tokens can be irretrievably lost or stolen by hackers. Transactions in cryptocurrency are typically irreversible, so mistakes (such as sending tokens to the wrong address) or theft cannot be remedied. While these risks do not stem directly from the token's intrinsic characteristics, they are important considerations for anyone holding CTC as any other crypto-asset, and the issuer will remind users of best practices (e.g. use of secure wallets, caution against unsolicited investment offers). Ultimately, holders are responsible for safeguarding their tokens, and any losses due to fraud or user error will fall on the individual.
-

4. Project implementation-related risks

- Risk of insufficient funds for project development: The expansion and long-term success of the CTC ecosystem depend on how the raised funds and company treasury will be managed. There is a risk that the funds collected (through the token sales and other revenue streams) may prove insufficient to fully execute the project's plans. The project's roadmap includes ambitious goals, which will require significant capital over time. If the funds raised during the token offerings are limited or if the project's revenues are lower than expected, the company might struggle to finance ongoing development, operations, or expansion. This could result in delays, scaled-down objectives, or even an inability to continue the project.

Mitigation: The issuer has addressed this matter self-imposing very conservative financial management rules: for example, committing to maintain a substantial portion of total CTC Token supply (38%) as a reserve in the Corporate Treasury for the long term. This treasury portion is intended to provide the company with capital to support operations and growth. In addition, the team plans to follow an investment strategy using part of the funds (e.g. accumulating BTC) to create a diversified reserve and attract potential liquidity providers or financiers for the project. By keeping a high treasury reserve and even converting some funds into established assets (like BTC), the issuer aims to ensure it has enough financial runway to sustain the project during its early years. However, these measures also introduce trade-offs and are not a guarantee: holding a large treasury reserve means those tokens are not distributed to users (which could slow down ecosystem

growth), and investing reserves in assets like Bitcoin exposes the project to additional market risk.

- Risks in allocation and management of proceeds: How the issuer allocates and uses the funds can create risks for token holders. There is the possibility of misallocation or inefficient use of funds – for instance, funds earmarked for product development or ecosystem growth might be spent too quickly on ineffective strategies or high expenses (like excessive marketing or operational costs) without yielding the expected results. If the raised capital is not managed prudently, the project’s financial health could deteriorate, leaving it unable to deliver on promised features or utility for CTC Token.

Mitigation: The team intends to mitigate this risk by carefully planning the use of funds and integrating revenue streams, as users can see on Roadmaps available on company’s website. The CTC ecosystem is designed so that the Real Estate Division and the Finance & Investments Division support each other, optimizing returns and generating ongoing cash flows that can fund the ecosystem development. For example, profits from real estate operations (facilitated by funds set aside for that purpose) are expected to be redistributed or reinvested in the ecosystem, which could benefit token holders indirectly by enhancing the platform’s value and sustainability. Nonetheless, these plans depend on successful execution. There is risk in the underlying business ventures – if the real estate investments or financial services do not perform as hoped, the returns that were supposed to support the ecosystem would not materialize. This would put pressure on the project’s finances and could negatively affect the token’s utility or value.

5. Technology-related risks

- Dependence on Solana blockchain performance: CTC Token is issued on the Solana blockchain, so the proper functioning of CTC depends on Solana’s network performance and security. The project does not operate or control the underlying distributed ledger itself. This means any shortcomings or failures of the Solana network can directly impact CTC Token. If the Solana blockchain were to go offline or become congested, CTC transactions (transfers, trades, or interactions with the ecosystem) could be delayed or temporarily impossible. Users might be unable to move or use their tokens during such disruptions. Similarly, if the Solana network encounters a serious technical failure or attack, the availability and reliability of CTC Token would suffer. The issuer has no ability to fix or prevent network-wide issues on Solana, and there is essentially no fallback ledger for the token.
- Lack of recourse and irreversibility: Transactions on Solana (and most blockchains) are typically irreversible once confirmed. If CTC Tokens are sent in error or stolen due to a hack, the technology generally does not allow undoing those transactions. Neither the issuer nor any authority can assist in recovering tokens in such cases,

since the system's decentralization means no single party can reverse the ledger. This technical finality is part of the design of blockchain systems but poses a risk for users who might lose tokens permanently due to mistakes or malicious acts. Also, since the project does not control the base technology, any remedial measures (like patching a bug or resolving a fork) depend on the Solana developer community. In summary, the robustness and security of the CTC Token are only as strong as the underlying technology stack (Solana and associated software). The issuer cannot mitigate blockchain-level risks beyond choosing what it believes is a reliable platform; ultimately, holders must acknowledge that these systemic technology risks are present.

- Network attacks, forks, or technical failures: Distributed ledger networks like Solana are exposed to potential consensus attacks and other technical vulnerabilities. Examples include 51% attacks or other majority-control attacks, double-spending attacks, denial-of-service incidents, or even unexpected forks in the blockchain protocol. Although Solana is a well-established blockchain, no blockchain is entirely immune to these risks. A successful attack on Solana's consensus mechanism could result in falsified transactions, security breaches, or network instability. Likewise, if the Solana protocol were to fork or split (due to conflicting updates or an attack), there could be confusion or incompatibility in recognizing which fork constitutes CTC Token, potentially undermining the token's integrity and value. Additionally, upgrades or changes in the Solana technology (or in the token standards it uses) might necessitate migrating CTC Token to a new protocol or version. If such a migration were required in the future (for example, to maintain compatibility or security), there is a risk that not all holders would smoothly transition, which could result in some tokens becoming non-functional for those who don't follow the upgrade. The issuer cannot guarantee that all such technical transitions will be free of issues.
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6. Mitigation measures

Corrective or mitigating measures, where applicable, have been described immediately after each specific risk in the dedicated subsections above. This structure has been adopted to ensure clarity and direct linkage between risks and the measures addressing them.

J. INFORMATION ON THE SUSTAINABILITY INDICATORS IN RELATION TO ADVERSE IMPACT ON THE CLIMATE AND OTHER ENVIRONMENT-RELATED ADVERSE IMPACTS

1. Name

ChartTower Corp.

2. Legal entity identifier

Not applicable – *LEI will be required and duly provided by 23 December 2025, in line with the entry into force of the relevant obligation under Delegated Regulation (EU) 2025/421*

3. Crypto-asset name

CTC Token (*DTI will be required and duly provided by 23 December 2025, in line with the entry into force of the relevant obligation under Delegated Regulation (EU) 2025/421*)

4. Consensus mechanism

The Solana blockchain operates under a hybrid consensus model combining Proof of History (PoH) with Proof of Stake (PoS). This design enables high throughput and low-latency validation, while maintaining decentralization and network security.

5. Incentive mechanisms and applicable fees

The Solana network applies standard transaction fees, which are typically very low and are paid in SOL, the native token of the blockchain. No additional incentive mechanisms or custom fees are applied to the use or transfer of CTC Tokens.

6. Beginning of the period to which the disclosed information relates

2024-03-21

7. End of the period to which the disclosed information relates

2025-03-21

8. Energy consumption

493.52297 kWh/a

9. Energy consumption sources and methodologies

Information obtained from other crypto-asset White Papers for crypto-assets issued via the same consensus mechanism, pursuant to art. 2(2) of EU Delegated Regulation 2025/422.

Source of information: DTI VPNL7Z0Z6; FFG-DTI TC417FPLR
