

White paper drafted under the European Markets in Crypto-Assets Regulation (EU) 2023/1114 for FFG 1VJ02JBZN



# **Preamble**

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### 01. Date of notification

2025-06-30

# 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 multiple 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

The \$PRIME tokens this white paper refers to are crypto-assets other than EMTs and ARTs, operating on the Ethereum and Base blockchains (at the time of writing this white paper: 2025-06-15 and according to DTI FFG shown in F.14).



The initial issuance of the 111,111,111 \$PRIME tokens (the so-called "mint") occurred on 2022-07-17, as recorded on the Ethereum blockchain (https://etherscan.io/tx/0x6be9bb38167a50cac44f28ddd79cef2fd2b5f56d6296ffb76860 2960307bd2f3, accessed 2025-06-16). Since 2023-08-18, the tokens are also available on Base (see https://basescan.org/tx/0x5efcc6343035558cc9e8e994cbc2015e3da4596bc61e9977f0 2f4d9d176d9e54, accessed 2025-06-17).

Given \$PRIME's hybrid functionality, including in-game utility, governance, and play-to-earn incentives, it is conceptually not classified as a utility token under the Markets in Crypto-Assets Regulation (MiCAR) per Article 3(1), due to the requirement of "exclusivity" (echelon.io/prime-token, accessed 2025-06-16).

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

Since holding the crypto-asset does not grant access to any goods or services, this is not applicable at the time of writing this white paper (2025-06-12).

# 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 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 token does not appear to be issued by a formal company or foundation in the

traditional sense. Instead, it follows a decentralized, community-driven approach

common in the meme coin space. The issuer's website (https://echelon.io/, accessed on

2025-06-16) does not list any entity as of writing.

However, on LinkedIn, the company page lists several people that are associated with

the project (https://www.linkedin.com/company/echelonprime/people/, accessed 2025-

06-16). For example, Oleksii S. is (https://www.linkedin.com/in/oleksii-s-b4a6a9335/,

accessed 2025-06-16) referring to himself as a founder and angel investor of the

project. The rest of the listed individuals is not clearly stating a management

involvement in the project.

Further, there is a registered stock corporation in California with the title "Echelon Prime

Inc." founded by Dennis Shogren, Eric Shogren and Kari Graybill (see

https://bizfileonline.sos.ca.gov/search/business with the search term "echelon prime",

accessed 2025-06-16). While it is technically possible that this company is only related

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by name, it is at least a hint to the Echelon Prime project at hand due to the business activity description in the statement of information, filed 2025-03-18, which outlines "Type of Business: Mobile App and Game design and publication". (File No.: BA20250563650)

# **B.3 Legal form**

See B.2., potentially H1UM

# **B4.** Registered address

Toronto, Ontario M5T 1X5, CA (according to https://www.linkedin.com/company/echelonprime/, accessed 2025-06-16)

#### **B.5** Head office

See B.4.

# **B.6 Registration date**

According to the LinkedIn page, the company was founded in 2022 - there is no closer specification available with this source (https://www.linkedin.com/company/echelonprime/about/). The minting event took place on 2022-07-17 (Ethereum) and became available on Base at 2023-08-18.

# **B.7 Legal entity identifier**

Could not be found while drafting this white paper (2025-06-17).

# 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**



Name	Role
Oleksii S.	Self-described founder and angel investor of the Echelon project
Dennis Shogren	Listed founder of Echelon Prime Inc. (California corporation)
Eric Shogren	Listed founder of Echelon Prime Inc. (California corporation)
Kari Graybill	Listed founder of Echelon Prime Inc. (California corporation)

# **B.11** Business activity

Assuming that the above mentioned entity (Echelon Prime Inc.) actually reflects the crypto-asset-related business, its activity is "Mobile App and Game design and publication" according to the statement of information, filed 2025-03-18, File No.: BA20250563650.

# **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: "Echelon Prime", Short Name: "PRIME" according to the Digital Token

Identifier Foundation (www.dtif.org, DTI see F.13, FFG DTI see F.14 as of 2025-06-16).

D.2 Crypto-assets name

See F.13.

**D.3 Abbreviation** 

See F.13.

**D.4 Crypto-asset project description** 

Echelon Prime is intended to be a Web3 ecosystem focused on advancing blockchain-

based gaming, operating on the Ethereum and Base blockchains. The project aims to

foster innovation in gaming models and decentralized economies by providing tools and

infrastructure for developers and players. The token, \$PRIME, is designed to facilitate

various functionalities within the ecosystem, including in-game transactions,

governance, and engagement incentives. The first game to integrate \$PRIME is Parallel, a

sci-fi trading card game, which is intended to showcase the token's utility in enhancing

gameplay and asset ownership.



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

Name	Role	Comment
Sascha Darius Mojtahed i	Founder and CEO of Parallel Studios	Leads the development of Parallel, the first game to utilize \$PRIME. Explicitly named as founder in CoinMarketCap (https://coinmarketcap.com/currencies/Echelon-Prime) and Crunchbase (https://www.crunchbase.com/organization/parallelstudios ), accessed 2025-06-16.
Kohji Nagata	Co-founder of Parallel Studios	Listed alongside Mojtahedi as co-founder in Crunchbase (https://www.crunchbase.com/person/kohji-nagata), and referenced in Echelon's \$50M valuation announcement (https://www.echelon.io/news/parallel-valuation-50m), accessed 2025-06-16.
Oleksii S.	Self-described founder and angel investor of Echelon Prime	Claims the title on LinkedIn (https://www.linkedin.com/in/oleksii-s-b4a6a9335), accessed 2025-06-16. Not corroborated by official project websites. Involvement may reflect early funding or advisory role.
Emissary Primes (e.g., Nayn "Hunain Naseer")	Elected community representative s	Serve as governance participants per Echelon blog (https://medium.com/EchelonPrime/emissary-elections-2025 and https://www.echelon.io/governance), accessed 2025-06-16. Mostly pseudonymous, with one identity (Hunain Naseer) confirmed through Gmail address usage.
Dennis Shogren	Founder of Echelon Prime	Listed in California Secretary of State registry (https://bizfileonline.sos.ca.gov/search/business), File No.



	Inc. (California)	BA20250563650, accessed 2025-06-16. No direct link confirmed to the PRIME token.
Eric	Founder of	Same source as above. The company is registered as
Shogren	Echelon Prime	focusing on "Mobile App and Game design and
	Inc. (California)	publication," aligning with Echelon Prime's game-centric
		use case.
Kari	Founder of	Same source and comments as for Dennis and Eric
Graybill	Echelon Prime	Shogren. No clear indication of active involvement in
	Inc. (California)	Echelon Prime token operations.

# **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

The \$PRIME token is intended to drive the Echelon Prime Web3 gaming ecosystem on Ethereum and Base blockchains, focusing on utility, governance, and growth. Plans include:

In-Game Utility: \$PRIME is designed to power PRIME Sinks (e.g., exclusive Parallel TCG cards, shard refining) and expand to games like Parallel Colony (www.echelon.io/primetoken, accessed 2025-06-16).

Governance: Staked \$PRIME enables voting on proposals, with Emissary Prime Elections (April 8–15, 2025) enabling community decisions (medium.com/EchelonPrime/emissary-elections-2025, accessed 2025-06-16).

P2E Incentives: ~30% of supply rewards players via skill-based gameplay, sustained by

sink redistributions (www.echelon.io/prime-token, accessed 2025-06-16).

These plans depend on adoption, regulatory stability, and technical reliability. The

distribution may change completely at any time and have a corresponding adverse

effect on the investor.

**D.9 Resource allocation** 

Echelon Prime aims to allocate \$PRIME to sustain its gaming ecosystem.

According to https://docs.echelon.io/echelon-prime-foundation/2.0-prime-token

(accessed 2025-06-16), the initial token distribution looks as follows:

Gameplay Pool:

35,227,778 PRIME — 31.7% of total supply

Parallel Studios Reserve:

21,848,889 PRIME — 19.7% of total supply

Parallel Studios Investors:

18,044,478 PRIME — 16.2% of total supply

Caching:

15,666,667 PRIME — 14.1% of total supply

Echelon Foundation Reserve:

12,428,333 PRIME — 11.2% of total supply

Prime Events:

7,895,000 PRIME — 7.1% of total supply

Total Supply:

111,111,111 PRIME — 100%

The distribution may change completely at any time and have a corresponding adverse

effect on the investor.

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

Not applicable, as this white paper was drawn up for the admission to trading and not

for collecting funds for the crypto-asset-project.

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

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

E.3 Fundraising target

Not applicable.

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# **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

As stated on the website and verified through the block explorer (https://etherscan.io/token/0xb23d80f5FefcDDaa212212F028021B41DEd428CF), a total of 111,111.111 tokens were minted on Ethereum.



Since 2023-08-18, the tokens were minted on Base (https://basescan.org/address/0xfA980cEd6895AC314E7dE34Ef1bFAE90a5AdD21b, accessed 2025-06-17). It has to be stated that the minting of tokens on Base is not original minting but intended to be dependent on the amount of tokens locked in a bridge contract so that the total supply of tokens across Layers remains unchanged. It has to be further stated that the supplied tokens were not fully claimed at the time of writing (2025-06-17), meaning that a portion of crypto-assets still remains with the token deployment contract.

The amount of available token in the market may change completely at any time and have a corresponding adverse effect on the investor.

# **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 cryptoassets 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.

# 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.

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

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holders, ensuring that it remains outside the scope of regulatory frameworks applicable to traditional financial instruments

F.2 Crypto-asset functionality

The PRIME token allows users to access certain ecosystem-specific features. One product type that is named in the documentation (https://docs.echelon.io/echelon-prime-foundation/3.0-prime-sinks, accessed 2025-06-13) are "PRIME Sinks". These describe token-gated products, services, and experiences available for PRIME. Several Sinks exist for example in the game "Parallel TCG" (more details here: https://parallel.life/). Sinks are not intended to be exclusive to "Parallel TCG". In this game, they are claimed to be purely cosmetical in nature, like in other cases (i.e. "Terminals" and "Artigraph"). Others, like "Payload" and "Echoes", are intended to be critical for "achieving scale".

Sinks lock up circulating supply and are intended to refill the Gameplay Pool, and reward stakeholders through Sink Distributions (see in D.9).

F.3 Planned application of functionalities

All functionalities referred to in F.2 have already been applied since they are intrinsic to the tokens.

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 Ethereum and Base blockchain. The tokens are fungible (up to 18 digits after the decimal point). 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://echelon.io/

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

2025-07-25

#### F.10 Publication date

2025-07-25

# F.11 Any other services provided by the issuer

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).

# 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

QM6M5W2DT;82F7LPGCF

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

1VJ02JBZN

# 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

See G.1.

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 (2025-06-13).

# **G.5** Issuer retained crypto-assets

The issuer could not be identified with certainty and therefore it is unknown if other wallets owning project tokens can be considered 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**

No, there are no fixed protocols that can increase or decrease the supply implemented as of 2025-06-13. 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. According to https://etherscan.io/token/0xb23d80f5FefcDDaa212212F028021B41DEd428CF#readContract (accessed 2025-06-13), both the configurator's role as well as the administrator's role have been renounced.

However, on the base chain, the owner is not renounced, meaning that the supply of tokens can likely be influenced at will (see https://basescan.org/token/0xfA980cEd6895AC314E7dE34Ef1bFAE90a5AdD21b#readC ontract, accessed 2025-06-16). The ownership status is with the PRIME foundation (according the credential to https://basescan.org/address/0xfA980cEd6895AC314E7dE34Ef1bFAE90a5AdD21b#not es, accessed 2025-06-16).

# **G.13 Supply adjustment mechanisms**

See G.12.

#### **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 crypto asset that is the subject of this white paper is available on multiple DLT

networks. These include: Ethereum and Base. In general, when evaluating crypto assets,

the total number of tokens issued across different networks must always be taken into

account, as spillover effects can be adverse for investors.

The following applies to the Ethereum network:

The crypto-asset's Proof-of-Stake (PoS) consensus mechanism, introduced with The

Merge in 2022, replaces mining with validator staking. Validators must stake at least 32

ETH every block a validator is randomly chosen to propose the next block. Once

proposed the other validators verify the blocks integrity. The network operates on a slot

and epoch system, where a new block is proposed every 12 seconds, and finalization

occurs after two epochs (~12.8 minutes) using Casper-FFG. The Beacon Chain

coordinates validators, while the fork-choice rule (LMD-GHOST) ensures the chain

follows the heaviest accumulated validator votes. Validators earn rewards for proposing

and verifying blocks, but face slashing for malicious behavior or inactivity. PoS aims to

improve energy efficiency, security, and scalability, with future upgrades like Proto-

Danksharding enhancing transaction efficiency.

The crypto-asset operates on a well-defined set of protocols and technical standards

that are intended to ensure its security, decentralization, and functionality. Below are

some of the key ones:

1. Network Protocols

The crypto-asset follows a decentralized, peer-to-peer (P2P) protocol where nodes

communicate over the crypto-asset's DevP2P protocol using RLPx for data encoding.

- Transactions and smart contract execution are secured through Proof-of-Stake (PoS)

consensus.

- Validators propose and attest blocks in Ethereum's Beacon Chain, finalized through

Casper FFG.

- The Ethereum Virtual Machine (EVM) executes smart contracts using Turing-complete

bytecode.

2. Transaction and Address Standards

crypto-asset Address Format: 20-byte addresses derived from Keccak-256 hashing of

public keys.

Transaction Types:

- Legacy Transactions (pre-EIP-1559)

- Type 0 (Pre-EIP-1559 transactions)

- Type 1 (EIP-2930: Access list transactions)

- Type 2 (EIP-1559: Dynamic fee transactions with base fee burning)

The Pectra upgrade introduces EIP-7702, a transformative improvement to account

abstraction. This allows externally owned accounts (EOAs) to temporarily act as smart

contract wallets during a transaction. It provides significant flexibility, enabling

functionality such as sponsored gas payments and batched operations without

changing the underlying account model permanently.

3. Blockchain Data Structure & Block Standards

- the crypto-asset's blockchain consists of accounts, smart contracts, and storage states,

maintained through Merkle Patricia Trees for efficient verification.

Each block contains:

- Block Header: Parent hash, state root, transactions root, receipts root, timestamp, gas

limit, gas used, proposer signature.

- Transactions: Smart contract executions and token transfers.

- Block Size: No fixed limit; constrained by the gas limit per block (variable over time). In

line with Ethereum's scalability roadmap, Pectra includes EIP-7691, which increases the

maximum number of "blobs" (data chunks introduced with EIP-4844) per block. This

change significantly boosts the data availability layer used by rollups, supporting

cheaper and more efficient Layer 2 scalability.

4. Upgrade & Improvement Standards

Ethereum follows the Ethereum Improvement Proposal (EIP) process for upgrades.

The following applies to the Base network:

Base is a Layer-2 (L2) solution on Ethereum that was introduced by Coinbase and

developed using Optimism's OP Stack. L2 transactions do not have their own consensus

mechanism and are only validated by the execution clients. The so-called sequencer

regularly bundles stacks of L2 transactions and publishes them on the L1 network, i.e.

Ethereum. Ethereum's consensus mechanism (Proof-of-stake) thus indirectly secures all

L2 transactions as soon as they are written to L1.

H.3 Technology used

The crypto asset that is the subject of this white paper is available on multiple DLT

networks. These include: Ethereum and Base. In general, when evaluating crypto assets,

the total number of tokens issued across different networks must always be taken into

account, as spillover effects can be adverse for investors.

Base:

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

Ethereum Virtual Machine (EVM), such as MetaMask, Coinbase Wallet, and Trust Wallet.

These wallets interact with Base in the same way as with other EVM-compatible chains,

using standard Web3 interfaces.

2. Decentralized Ledger:Base operates as a Layer-2 blockchain on Ethereum and

maintains its own decentralized ledger for recording token transactions. Final

transaction data is periodically posted to Ethereum Layer 1, ensuring long-term

availability and resistance to tampering.

3. ERC-20 Token Standard:The Base network supports tokens implemented under the

ERC-20 standard, the same as on Ethereum.

4. Scalability and Transaction Efficiency:

As a rollup-based Layer-2, Base is intended to handle high volumes of transactions with

lower fees compared to Ethereum Layer 1. This is enabled by off-chain execution and

on-chain data posting via optimistic rollup architecture.

Ethereum:

1. Decentralized Ledger: The Ethereum 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.

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

store their wallet's private keys and recovery phrases.

3. Cryptographic Integrity: Ethereum employs elliptic curve cryptography to validate and

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

Keccak-256 (SHA-3 variant) Hashing Algorithm is used for hashing and address

generation. The crypto-asset uses ECDSA with secp256k1 curve for key generation and

digital signatures. Next to that, BLS (Boneh-Lynn-Shacham) signatures are used for

validator aggregation in PoS.

**H.4 Consensus mechanism** 

The crypto asset that is the subject of this white paper is available on multiple DLT

networks. These include: Ethereum and Base. In general, when evaluating crypto assets,

the total number of tokens issued across different networks must always be taken into

account, as spillover effects can be adverse for investors.



The crypto-asset's Proof-of-Stake (PoS) consensus mechanism, introduced with The Merge in 2022, replaces mining with validator staking. Validators must stake at least 32 ETH every block a validator is randomly chosen to propose the next block. Once proposed the other validators verify the blocks integrity. The network operates on a slot and epoch system, where a new block is proposed every 12 seconds, and finalization occurs after two epochs (~12.8 minutes) using Casper-FFG. The Beacon Chain coordinates validators, while the fork-choice rule (LMD-GHOST) ensures the chain follows the heaviest accumulated validator votes. Validators earn rewards for proposing and verifying blocks, but face slashing for malicious behavior or inactivity. PoS aims to improve energy efficiency, security, and scalability, with future upgrades like Proto-Danksharding enhancing transaction efficiency.

The following applies to the Base network:

Base is a Layer-2 (L2) solution on Ethereum that was introduced by Coinbase and developed using Optimism's OP Stack. L2 transactions do not have their own consensus mechanism and are only validated by the execution clients. The so-called sequencer regularly bundles stacks of L2 transactions and publishes them on the L1 network, i.e. Ethereum. Ethereum's consensus mechanism (Proof-of-stake) thus indirectly secures all L2 transactions as soon as they are written to L1.

## H.5 Incentive mechanisms and applicable fees

The crypto asset that is the subject of this white paper is available on multiple DLT networks. These include: Ethereum and Base. In general, when evaluating crypto assets, the total number of tokens issued across different networks must always be taken into account, as spillover effects can be adverse for investors.

Ethereum: The crypto-asset's PoS system secures transactions through validator incentives and economic penalties. Validators stake at least 32 ETH and earn rewards for proposing blocks, attesting to valid ones, and participating in sync committees. Rewards are paid in newly issued ETH and transaction fees. Under EIP-1559, transaction fees consist of a base fee, which is burned to reduce supply, and an optional priority fee (tip) paid to validators. Validators face slashing if they act maliciously and incur penalties



for inactivity. This system aims to increase security by aligning incentives while making the crypto-asset's fee structure more predictable and deflationary during high network activity.

Base is a Layer-2 (L2) solution on Ethereum that uses optimistic rollups provided by the OP Stack on which it was developed. Transaction on base are bundled by a, so called, sequencer and the result is regularly submitted as an Layer-1 (L1) transactions. This way many L2 transactions get combined into a single L1 transaction. This lowers the average transaction cost per transaction, because many L2 transactions together fund the transaction cost for the single L1 transaction. This creates incentives to use base rather than the L1, i.e. Ethereum, itself. To get crypto-assets in and out of base, a special smart contract on Ethereum is used. Since there is no consensus mechanism on L2 an additional mechanism ensures that only existing funds can be withdrawn from L2. When a user wants to withdraw funds, that user needs to submit a withdrawal request on L1. If this request remains unchallenged for a period of time the funds can be withdrawn. During this time period any other user can submit a fault proof, which will start a dispute resolution process. This process is designed with economic incentives for correct behaviour.

### H.6 Use of distributed ledger technology

No, DLTs are 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

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 2025-06-16). 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

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.

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

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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 Ethereum's or Base network'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

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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

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 involve the DLT network Base, where the crypto asset is issued in.

### 1. Blockchain Dependency Risks

Network Downtime: Potential outages or congestion on the involved blockchains could interrupt on-chain token transfers, trading, and other functions.

#### 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 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 blockchains 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, the relatively smaller number of validators/concentration of stakes within the networks compared to other blockchains might pose centralization risks, potentially affecting network resilience.

5. Evolving Technology Risks: Technological Obsolescence: The fast pace of innovation in blockchain technology may make the used token standard appear less competitive or become outdated, potentially impacting the usability or adoption of the token.

## 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

Echelon Prime

#### **S.4 Consensus Mechanism**

Echelon Prime is present on the following networks: Base, Ethereum.

Base is a Layer-2 (L2) solution on Ethereum that was introduced by Coinbase and developed using Optimism's OP Stack. L2 transactions do not have their own consensus mechanism and are only validated by the execution clients. The so-called sequencer regularly bundles stacks of L2 transactions and publishes them on the L1 network, i.e. Ethereum. Ethereum's consensus mechanism (Proof-of-stake) thus indirectly secures all L2 transactions as soon as they are written to L1.

The crypto-asset's Proof-of-Stake (PoS) consensus mechanism, introduced with The Merge in 2022, replaces mining with validator staking. Validators must stake at least 32 ETH every block a validator is randomly chosen to propose the next block. Once proposed the other validators verify the blocks integrity. The network operates on a slot and epoch system, where a new block is proposed every 12 seconds, and finalization occurs after two epochs (~12.8 minutes) using Casper-FFG. The Beacon Chain



coordinates validators, while the fork-choice rule (LMD-GHOST) ensures the chain follows the heaviest accumulated validator votes. Validators earn rewards for proposing and verifying blocks, but face slashing for malicious behavior or inactivity. PoS aims to improve energy efficiency, security, and scalability, with future upgrades like Proto-Danksharding enhancing transaction efficiency.

# S.5 Incentive Mechanisms and Applicable Fees

Echelon Prime is present on the following networks: Base, Ethereum.

Base is a Layer-2 (L2) solution on Ethereum that uses optimistic rollups provided by the OP Stack on which it was developed. Transaction on base are bundled by a, so called, sequencer and the result is regularly submitted as an Layer-1 (L1) transactions. This way many L2 transactions get combined into a single L1 transaction. This lowers the average transaction cost per transaction, because many L2 transactions together fund the transaction cost for the single L1 transaction. This creates incentives to use base rather than the L1, i.e. Ethereum, itself. To get crypto-assets in and out of base, a special smart contract on Ethereum is used. Since there is no consensus mechanism on L2 an additional mechanism ensures that only existing funds can be withdrawn from L2. When a user wants to withdraw funds, that user needs to submit a withdrawal request on L1. If this request remains unchallenged for a period of time the funds can be withdrawn. During this time period any other user can submit a fault proof, which will start a dispute resolution process. This process is designed with economic incentives for correct behaviour.

The crypto-asset's PoS system secures transactions through validator incentives and economic penalties. Validators stake at least 32 ETH and earn rewards for proposing blocks, attesting to valid ones, and participating in sync committees. Rewards are paid in newly issued ETH and transaction fees. Under EIP-1559, transaction fees consist of a base fee, which is burned to reduce supply, and an optional priority fee (tip) paid to validators. Validators face slashing if they act maliciously and incur penalties for inactivity. This system aims to increase security by aligning incentives while making the crypto-asset's fee structure more predictable and deflationary during high network activity.

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

2024-06-29

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

2025-06-29

S.8 Energy consumption

316.38813 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 networks Base and Ethereum 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

26.5386870830%

S.11 Energy intensity

0.00001 kWh

S.12 Scope 1 DLT GHG emissions – Controlled

0.00000 tCO2e/a

S.13 Scope 2 DLT GHG emissions – Purchased

0.10031 tCO2e/a

S.14 GHG intensity

0.00003 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

