

White Paper Propy Token (PRO)

Public Document

Issuer: Propy Inc.

Version: 4.0

Date: August 18, 2025

Table Of Contents

General	8
01. Date of Notification	8
02. Statement in accordance with Article 6(3) of Regulation (EU) 2023/1114	8
03. Compliance statement in accordance with Article 6(6) of Regulation (EU) 2023/1114	8
04. Statement in accordance with Article 6(5), points (a), (b), (c) of Regulation (EU) 2023/1114	8
05. Statement in accordance with Article 6(5), point (d) of Regulation (EU) 2023/1114	8
06. Statement in accordance with Article 6(5), points (e) and (f) of Regulation (EU) 2023/1114	8
Summary	8
07. Warning in accordance with Article 6(7), second subparagraph, of Regulation (EU) 2023/1114	9
08. Characteristics of the crypto-asset	9
09. Information about the quality and quantity of goods or services to which the utility tokens give access and	

restrictions on the transferability	12
10. Key information about the offer to the public or admission to trading	14
Part A – Information about the offeror or the person seeking admission to trading	16
A.1. Name	15
A.2. Legal Form	15
A.3. Registered address:	15
A.4. Head office	15
A.5. Registration date	15
A.6. Legal entity identifier (LEI)	15
A.7. Another identifier required pursuant to applicable national law.....	16
A.8. Contact telephone number	16
A.9. E-Mail address.....	16
A.10. Response time (Days).....	16
A.11. Parent company	16
A.12. Members of the management body	16
A.13. Business activity	17
A.14. Parent Company Business Activity	17
A.15. Newly Established	17
A.16. Financial Condition for the Past Three Years	17
A.17. Financial Condition Since Registration	19
Part B Information about the issuer, if different from the offeror or person seeking admission to trading	20
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	21
Part D – Information about the crypto-asset project	19
D.1. Crypto-asset project name	19
D.2. Crypto-assets name	19
D.3. Abbreviation	19

D.4. Crypto-asset project description	20
D.5. Details of all natural or legal persons involved in the implementation of the crypto-asset project.....	20
D.6. Utility Token Classification	20
D.7. Key Features of Goods/Services for Utility Token Projects	20
D.8. Plans for the token	21
D.9. Resource allocation.....	22
D.10. Planned use of Collected funds or crypto-Assets.....	22
Part E – Information about the offer to the public of crypto-assets or their admission to trading	24
E.1. Public offering or admission to trading.....	23
E.2. Reasons for public offer or admission to trading	23
E.3. Fundraising target	23
E.4. Minimum subscription goals.....	23
E.5. Maximum subscription goal.....	23
E.6. Oversubscription acceptance.....	23
E.7. Oversubscription allocation	23
E.8. Issue price	23
E.9. Official currency or any other crypto-assets determining the issue price	23
E.10. Subscription fee.....	24
E.11. Offer Price Determination Method	24
E.12. Total number of offered/traded crypto-assets.....	24
E.13. Targeted holders	24
E.14. Holder restrictions	24
E.15. Reimbursement notice	24
E.16. Refund mechanism	24
E.17. Refund timeline	24
E.18. Offer phases.....	24
E.19. Early purchase discount.....	24
E.20. Time-limited offer.....	24

E.21. Subscription period beginning	24
E.22. Subscription period end	25
E.23. Safeguarding arrangements for offered funds/crypto-assets	25
E.24. Payment methods for crypto-asset purchase	25
E.25. Value transfer methods for reimbursement	25
E.26. Right of withdrawal	25
E.27. Transfer of purchased crypto-assets	25
E.28. Transfer time schedule	25
E.29. Purchaser's technical requirements	25
E.30. Crypto-asset service provider (CASP) name	25
E.31. CASP identifier	26
E.32. Placement form	26
E.33. Trading platforms name	26
E.34. Trading Platforms Market identifier code (MIC)	26
E.35. Trading platforms access	26
E.36. Involved costs	26
E.37. Offer expenses	26
E.38. Conflicts of interest	26
E.39. Applicable law	26
E.40. Competent court	26
Part F - Information about the crypto-assets	29
F.1. Crypto-asset type	27
F.2. Crypto-asset functionality	27
F.3. Planned application of functionalities	27
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.	27
F.4. Type of crypto-asset white paper	27

F.5. The type of submission.....	27
F.6. Crypto-asset characteristics	28
F.7. Commercial name or trading name	28
F.8. Website of the issuer	28
F.9. Starting date of offer to the public or admission to trading	28
F.10. Publication date	28
F.11. Any other services provided by the issuer	28
F.12. Language or languages of the crypto-asset white paper	28
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.....	31
F.14. Functionally fungible group digital token identifier, where available	29
F.15. Voluntary data flag.....	29
F.16. Personal data flag.....	30
F.17. LEI eligibility.....	30
F.18. Home member state	30
F.19. Host Member States.....	31
Part G - Information on the rights and obligations attached to the crypto-assets	35
G.1. Purchaser Rights and Obligations	32
G.2. Exercise of Rights and Obligations.....	32
G.3. Conditions for modifications of rights and obligations.....	33
G.4. Future public offers	33
G.5. Issuer retained crypto-assets.....	33
G.6. Utility token classification	34
G.7. Key features of goods/services of utility tokens	35
G.8. Utility tokens redemption	35
G.9. Non-trading request	36
G.10. Crypto-assets purchase or sale modalities	36
G.11. Crypto-assets transfer restrictions.....	36

G.12. Supply adjustment protocols	36
G.13. Supply adjustment mechanisms	37
G.14. Token value protection schemes	37
G.15. Token value protection scheme description	37
G.16. Compensation schemes	37
G.17. Compensation scheme description	38
G.18. Applicable law	38
G.19. Competent court	38
Part H — Information on the underlying technology	43
H.1. Distributed ledger technology (DLT)	39
H.2. Protocols and technical standards	39
H.3. Technology used	41
H.4. Consensus mechanism	41
H.5. Incentive mechanisms and applicable fees	42
H.6. Use of Distributed Ledger Technology	43
H.7. DLT Functionality Description	43
H.8. Audit	43
H.9. Audit outcome	43
Part I — Information on risks	48
I.1. Offer-related risks	44
I.2. Issuer-related risks	45
I.3. Crypto-assets related risks	45
I.4. Project implementation-related risks	47
I.5. Technology-related risks	48
I.6. Mitigation measures	49
Part J – Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts	55
J.1. Adverse impacts on climate and other environment-related adverse impacts	51

Mandatory information on principal adverse impacts on the climate and other environment-related adverse impacts of the consensus mechanism	51
General Information	51
S.1. Name	51
S.2. Relevant legal entity identifier	51
S.3. Name of the crypto assets	51
S.4. Consensus Mechanism	51
S.5. Incentive Mechanisms and Applicable Fees	51
S.6. Beginning of the period to which the disclosure relate	51
S.7. End of the period to which the disclosure relates	52
Mandatory key indicator on energy consumption	52
S.8. Energy consumption.....	52
S.9. Energy consumption sources and methodologies.....	52
Supplementary key indicators on energy and GHG emissions	52
S.10. Renewable energy consumption.....	52
S.11. Energy intensity	52
S.12. Scope 1 DLT GHG emissions – controlled	52
S.13. Scope 2 DLT GHG emissions – purchased.....	52
S.14. GHG Intensity	52
Sources and methodologies	52
S.15. Key energy sources and methodologies.....	53
S.16. Key GHG sources and methodologies	53

General		
01	Date of Notification	2025-08-18
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 offeror 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 omission 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 utility token referred to in this 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.
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	8.1 Brief Description and Purpose The Propy token (“PRO” or “PRO Token”) is a ERC-20 utility token designed for use exclusively within the Propy platform (“Platform”). It allows holders to access Propy ecosystem services including property NFT minting, Web3 property listings, and transaction processing, all subject to successful registration and verification on the Platform. Services are only accessible using PRO Tokens, and quoted either in PRO or in \$USD terms (in which case the number of PRO Tokens payable for a service would fluctuate according to PRO-USD price). Utility of the PRO token: 1. <u>OnChain Title Registry</u> Propy created a blockchain-based title registry that enables users to mint NFTs representing a property address, record property deeds on chain, and tokenize real estate as Real World Assets (RWAs). The system is divided into 3 tiers and is payable only in PRO token: Tier1: Address NFT Minting (~\$10 in PRO) - Users can mint a unique, gamified NFT representing a property address. These NFTs do not confer any legal rights, ownership, or claim to the underlying real-world property. Tier2: On-Chain Deed Recording (~\$18 in PRO) - Users can record property deeds on-chain by adding a new set of metadata to the existing Address NFT. This metadata includes the IPFS Content Identifier (CID) of the deed document, which is password-protected for enhanced privacy. All deeds are verified by Propy prior to upload to ensure authenticity and accuracy. Tier3: Real World Asset Tokenization (\$2,000 in PRO tokens) - A service fee of \$2,000 in PRO tokens is required to access the Tier 3 tokenization service. On approval, users can
----	-------------------------------------	---

		tokenize full property ownership, which involves creating an LLC or equivalent legal wrapper for the NFT-represented title. In order to access any of the tiers, users are required to: - connect an Ethereum-compatible wallet (e.g., MetaMask); - hold sufficient PRO tokens; - cover gas fees; and - complete full KYC for access to tier 2 and 3. 2. <u>Educational Courses</u> Service Description: The PRO utility token can be used to enroll in educational courses, an online certification program tailored for real estate professionals. Topics Covered: The course curriculum includes blockchain fundamentals, crypto payments, smart contracts, on-chain deed recording, and compliance. Outcome: Upon successful completion, participants receive a certificate and a special badge displayed on their Propy profile. Payment Options: The course is payable in PRO tokens. Discounts: Course fees are generally fixed, but Propy may occasionally offer limited-time referral promotions via special URL links that provide discounts. Access Conditions: To enroll, users must have a verified Propy account, which requires registration, acceptance of terms and conditions, and account confirmation in accordance with Propy's authentication policy. 3. <u>Web3 Property Listing</u> Service Description: The PRO token can be used to create a public, on-chain property listing with property details attached. (\$50 PRO) Access Conditions: To use this service, users must complete Propy's verification to ensure they are either a licensed real estate agent or the owner of the property.
--	--	--

		<u>8.3 Rights and Obligations</u> The rights and obligations associated with PRO tokens arise from: • This white paper, outlining the token's purpose and functionality; • The Terms and Conditions (T&C) of the Platform, available at https://propy.com/browse/terms-and-conditions/; • The Consideration Terms and Conditions, available at https://propy.com/browse/consideration-terms/, governing PRO rewards to Platform users; Holders of PRO tokens gain access to the utilities set out above if they comply with the prerequisite conditions for the service, also set out in 8.1. <u>8.4 Modification of Rights and Obligations</u> Propy's Terms and Conditions governing the use of the Platform, including the use of any PRO Token utilities, are subject to change in accordance with their terms. <u>8.5 Transferability</u> PRO tokens are freely transferable. Transferability does not guarantee access to the service, users are required to meet various conditions depending on the service they purchase. <u>8.6 Gas Fees</u> All blockchain transactions related to PRO require gas fees on the underlying chain (not charged by Propy), which are paid by the token holder. These fees depend on the blockchain network conditions and must be covered in the underlying native token of the relevant blockchain, e.g. Ether (ETH) for transactions on the Ethereum blockchain. <u>8.7 Future Developments</u> As of the date of this white paper, all functionalities and utilities of the PRO Tokens as noted in section 8.1 above are fully developed. Propy may introduce additional functionalities for PRO Tokens in compliance with regulatory requirements. All changes will be transparently communicated to token holders.
--	--	--

09	Information about the quality and quantity of goods or services to which the utility tokens give access and restrictions on the transferability	Service, pricing and access conditions: <u>OnChain Title Registry</u> Tier1: Address NFT Minting (~\$10 in PRO) - Users can mint a unique, gamified NFT representing a property address. These NFTs do not confer any legal rights, ownership, or claim to the underlying real-world property. Tier2: On-Chain Deed Recording (~\$18 in PRO) - Users can record property deeds on-chain by adding a new set of metadata to the existing Address NFT. This metadata includes the IPFS Content Identifier (CID) of the deed document, which is password-protected for enhanced privacy. All deeds are verified by Propy prior to upload to ensure authenticity and accuracy. Tier3: Real World Asset Tokenization (2,000 PRO) - A service fee of 2,000 PRO tokens is required to access the Tier 3 tokenization service. On approval, users can tokenize full property ownership, which involves creating an LLC or equivalent legal wrapper for the NFT-represented title. <u>Educational Courses</u> Service Description: The PRO utility token can be used to enroll in educational courses, an online certification program tailored for real estate professionals. Topics Covered: The course curriculum includes blockchain fundamentals, crypto payments, smart contracts, on-chain deed recording, and compliance. Outcome: Upon successful completion, participants receive a certificate and a special badge displayed on their Propy profile. Payment Options: The course is payable in PRO tokens. Discounts: Course fees are generally fixed, but Propy may occasionally offer limited-time referral promotions via special URL links that provide discounts. Access Conditions: To enroll, users must have a verified Propy account, which requires registration, acceptance of terms and conditions, and account confirmation in accordance with Propy's authentication policy.
----	---	---

		<u>Web3 Property Listing</u> Service Description: The PRO token can be used to create a public, on-chain property listing with property details attached. Access Conditions: To use this service, users must complete Propy's verification to ensure they are either a licensed real estate agent or the owner of the property. The quality or level of service: As provided by Propy. Limits or caps: None. Restrictions are transferability: PRO tokens are freely transferable. Transferability does not guarantee access to the service, users are required to meet various conditions depending on the service they purchase.															
10	Key information about the offer to the public or admission to trading	The issuance of PRO tokens has already been completed, and the tokens are currently listed on various exchanges, including Coinbase, MEXC, Gate, KuCoin, HTX and BitMart. Propy is now seeking admission to trading on EU-based, MiCA-compliant trading platforms. PRO Distribution according to pre-TGE roadmap: <table border="1"> <thead> <tr> <th>Category</th><th>Percentage</th><th>Current Status</th></tr> </thead> <tbody> <tr> <td>Sales Pool</td><td>35%</td><td>Partly distributed</td></tr> <tr> <td>Network Growth Pool</td><td>35%</td><td>Partly distributed</td></tr> <tr> <td>Company Pool</td><td>15%</td><td>Partly distributed</td></tr> <tr> <td>Donation Pool</td><td>15%</td><td>Fully distributed</td></tr> </tbody> </table>	Category	Percentage	Current Status	Sales Pool	35%	Partly distributed	Network Growth Pool	35%	Partly distributed	Company Pool	15%	Partly distributed	Donation Pool	15%	Fully distributed
Category	Percentage	Current Status															
Sales Pool	35%	Partly distributed															
Network Growth Pool	35%	Partly distributed															
Company Pool	15%	Partly distributed															
Donation Pool	15%	Fully distributed															

		• Sales Pool: Tokens allocated for sale, including to early contributors, under public sale (2017) and subsequent ad-hoc sales. • Network Growth Pool: Tokens reserved for incentivizing users to use the Propy platform and for popularizing the Propy platform, including real estate agents, buyers, sellers, and other ecosystem participants. • Company Pool: Tokens allocated to Propy Inc. for payments to key team members, blockchain engineers and other vendors and consultants working on Propy, as well as operational expenses and ongoing platform development. • Donation Pool: Tokens designated for community initiatives to support the improvement of blockchain infrastructure and education on blockchain. 10.3 Listing Price and Trading Availability As the PRO Tokens are already available on various global exchanges, it is anticipated that the trading price on EU exchanges following listing will follow the prices on such exchanges, with minor gaps, if any. The trading of PRO tokens on EU-regulated trading platforms will be available to all users of such trading platforms, and subject to such platforms' onboarding, KYC and AML procedures. Most trading and exchange services offered by regulated crypto-asset service providers are available to retail users.
--	--	---

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

A.1	Name	Propy Inc.
A.2	Legal Form	Private, limited liability corporation.
A.3	Registered address:	490 Post Street, Ste. 526 San Francisco, CA 94102
A.4	Head office	490 Post Street, Ste. 526 San Francisco, CA 94102
A.5	Registration date	2015/04/23
A.6	Legal entity identifier (LEI)	N/A

A.7	Another identifier required pursuant to applicable national law	Not applicable.
A.8	Contact telephone number	001 415 926 8292
A.9	E-Mail address	info@propy.com
A.10	Response time (Days)	5
A.11	Parent company	Not applicable.

A.12	Members of the management body			
		Name	Function	Business Address
		Natalia Karayaneva	Founder, CEO	490 Post Street, Ste. 526 San Francisco, CA 94102
		Denitza Tyufekchieva	Founder, Head of Business Development	490 Post Street, Ste. 526 San Francisco, CA 94102
		Maria Angelova	Founder, CFO	490 Post Street, Ste. 526 San Francisco, CA 94102
A.13	Business activity	Propy Inc. is a software technology company operating in the real estate sector, providing blockchain-based and AI powered solutions for property transactions, title management, and property tokenization. The company operates primary on its Propy platform.		
A.14	Parent Company Business Activity	Not Applicable.		
A.15	Newly Established	False		

A.16	Financial Condition for the Past Three Years	Propy Inc. was founded in 2015. Over the past 10 years, Propy Inc. has operated in a challenging market environment, shaped by evolving regulations and varying levels of adoption for tokenization solutions. Despite these external factors, the company has remained committed to continuous innovation and platform development. In 2022, the company generated moderate revenues but reported a minor negative net result, primarily attributable to continued investment in platform development, regulatory readiness, and operational scaling. In 2023, revenues fluctuated in line with adoption cycles, and the company again recorded a modest net loss. This reflected the sustained commitment to research, development, and market positioning, consistent with a long-term growth strategy. In 2024, the company recorded a material improvement in financial performance, characterised by a significant increase in revenues and the generation of a substantial net profit. This improvement was driven by increased market uptake of the company's solutions, operational efficiencies, and the positive impact of investments undertaken in prior years. Over the three-year period, total assets have increased considerably, equity has strengthened, and liabilities have remained minimal. The company has not incurred material long-term debt, maintaining a conservative capital structure. Liquidity has remained positive throughout, supported by proceeds from a prior token sale and equity financing rounds. These funds have been allocated to product development, regulatory compliance, and the expansion of operational capacity. Liabilities remained consistently below 5% of total assets each year, indicating very low leverage. Equity accounted for the vast majority of the company's capital base, reflecting strong solvency. The revenue growth rate from 2023 to 2024 was several times higher than the rate observed from 2022 to 2023, signalling a step change in commercial performance. The transition from negative to positive operating results between 2023 and 2024 exceeded a twofold improvement relative to the prior year's operating loss.
------	--	---

		The ratio of total assets to revenues improved year-on-year, suggesting increased efficiency in the use of resources to generate income. The overall trend across the period reflects a transition from early-stage reinvestment and modest operating losses to strong operational performance and profitability, consistent with the size, complexity, and growth stage of the business. The company has adopted a prudent financial strategy, ensuring sufficient liquidity to cover ongoing obligations without accumulating long-term debt. As of December 31, 2024, Propy Inc maintains a positive cash position, allowing for continued investment in product enhancements and market expansion. Propy Inc remains focused on technological advancements and sustainable growth, prioritizing long-term platform development while adapting to an evolving regulatory and economic landscape.
A.17	Financial Condition Since Registration	Not applicable, as Propy Inc has been established for more than three years.

Part B Information about the issuer, if different from the offeror or person seeking admission to trading	
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

Not applicable

Part D – Information about the crypto-asset project

D.1	Crypto-asset project name	Propy												
D.2	Crypto-assets name	Propy Token												
D.3	Abbreviation	PRO												
D.4.	Crypto-asset project description	Propy Inc. is a software technology company operating in the real estate sector, providing blockchain-based and AI powered solutions for property transactions, title management, and property tokenization. The company operates primary on its Propy platform.												
D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project	<table> <tr> <th>Name</th><th>Function</th><th>Business Address</th></tr> <tr> <td>Natalia Karayaneva</td><td>Founder, CEO</td><td>490 Post Street, Ste. 526 San Francisco, CA 94102</td></tr> <tr> <td>Denitza Tyufekchieva</td><td>Founder, Head of Business Development</td><td>490 Post Street, Ste. 526 San Francisco, CA 94102</td></tr> <tr> <td>Maria Angelova</td><td>Founder, CFO</td><td>490 Post Street, Ste. 526 San Francisco, CA 94102</td></tr> </table>	Name	Function	Business Address	Natalia Karayaneva	Founder, CEO	490 Post Street, Ste. 526 San Francisco, CA 94102	Denitza Tyufekchieva	Founder, Head of Business Development	490 Post Street, Ste. 526 San Francisco, CA 94102	Maria Angelova	Founder, CFO	490 Post Street, Ste. 526 San Francisco, CA 94102
Name	Function	Business Address												
Natalia Karayaneva	Founder, CEO	490 Post Street, Ste. 526 San Francisco, CA 94102												
Denitza Tyufekchieva	Founder, Head of Business Development	490 Post Street, Ste. 526 San Francisco, CA 94102												
Maria Angelova	Founder, CFO	490 Post Street, Ste. 526 San Francisco, CA 94102												

D.6	Utility Token Classification	True
D.7	Key Features of Goods/Services for Utility Token Projects	The PRO token provides access to the following goods and services within the Propy ecosystem: <u>OnChain Title Registry:</u> Propy's blockchain-based title registry that enables users to mint NFTs representing a property address, record property deeds on chain, and tokenize real estate as Real World Assets (RWAs). Goods and services include: • Address NFT Minting - Users can mint a unique, gamified NFT representing a property address. These NFTs do not confer any legal rights, ownership, or claim to the underlying real-world property. • On-Chain Deed Recording - Users can record property deeds on-chain by adding a new set of metadata to the existing Address NFT. This metadata includes the IPFS Content Identifier (CID) of the deed document, which is password-protected for enhanced privacy. All deeds are verified by Propy prior to upload to ensure authenticity and accuracy. • Real World Asset Tokenization - On approval, users can tokenize full property ownership, which involves creating an LLC or equivalent legal wrapper for the NFT-represented title. <u>Educational Courses:</u> The PRO utility token can be used to enroll in educational courses, an online certification program tailored for real estate professionals. The course curriculum includes blockchain fundamentals, crypto payments, smart contracts, on-chain deed recording, and compliance. Upon successful completion, participants receive a certificate and a special badge displayed on their Propy profile. <u>Web3 Property Listing:</u> The PRO token can be used to create a public, on-chain property listing with property details attached. To use this service, users must complete Propy's verification to ensure they are either a licensed real estate agent or the owner of the property.
D.8	Plans for the token	The utilities described in this white paper are already effective. Propy may introduce additional utilities to the token over time. The Token sale was completed, there are no future plans of selling any additional tokens. Tokens allocated to Network Growth Pool (initially 35% of Token supply, currently holds ~ 20 million tokens) to be used for incentivizing individual users to use Propy platform and for popularizing the Propy platform.

		Network Growth Pool is and will continue to be used as a source for user incentivization, such as the loyalty and rewards programs designed to drive user adoption and encourage long-term platform engagement. Tokens allocated to Company Reserve (initially 15% of Token supply, currently holds ~4.5 million tokens to be used for payments to blockchain engineers and other vendors and consultants who are working on Propy.
D.9	Resource allocation	The Propy platform is fully developed and operational, and the Propy team allocates its resources strategically to support continued innovation and expansion. These efforts include global recruitment of top-tier engineering talent for software development, scaling operations through the hiring of experienced sales and marketing consultants, and strengthening organizational infrastructure through administrative support functions. The development and operation of the Platform are supported by the following resource allocations: • 20% to Research & Development focused on maintaining and advancing the Platform's technological foundation. This includes ongoing development of blockchain infrastructure for secure, transparent transaction recording and smart contract execution, as well as AI-driven features to automate workflows, enhance user experience, and support intelligent compliance monitoring. Additional efforts cover security enhancements, regulatory compliance features, and third-party integration capabilities. • 60% to Sales & Marketing driving user acquisition, customer success, partnership development, and go-to-market efforts to grow adoption across global markets. • 20% to Administration ensuring legal, financial, and operational governance as the company scales. These resource allocations ensure the long-term scalability, security, and regulatory compliance of the Platform, enabling issuers to efficiently tokenize assets and expand their digital asset offerings.
D.10	Planned use of Collected funds or crypto-Assets	Not Applicable; offering to the public was completed in 2022

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	Admission to trading
E.2	Reasons for public offer or admission to trading	It is the aim of the project to be compliant with all applicable laws and regulations, while increasing accessibility to PRO Tokens. As such, Propy Inc. is seeking to admit PRO Tokens to trading so as to be able to have a wider reach within the EU, while ensuring legal compliance.
E.3	Fundraising target	Not applicable
E.4	Minimum subscription goals	Not applicable
E.5	Maximum subscription goal	Not applicable
E.6	Oversubscription acceptance	FALSE

E.7	Oversubscription allocation	Not applicable
E.8	Issue price	Not applicable
E.9	Official currency or any other crypto-assets determining the issue price	Not applicable
E.10	Subscription fee	Not applicable
E.11	Offer Price Determination Method	Not applicable
E.12	Total number of offered/traded crypto-assets	To be determined, based on the Exchange's requirements.
E.13	Targeted holders	ALL [All types of Investors]
E.14	Holder restrictions	Not applicable

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	Based on CASP's terms and conditions.
E.25	Value transfer methods for reimbursement	Not applicable
E.26	Right of withdrawal	Based on CASP's terms and conditions.
E.27	Transfer of purchased crypto-assets	Not applicable.
E.28	Transfer time schedule	Not applicable
E.29	Purchaser's technical requirements	The purchase of PRO tokens on EU-regulated trading platforms will be available to all users of such trading platforms, and subject to such platforms' onboarding, KYC and AML procedures. Most trading and exchange services offered by regulated crypto-asset service providers are available to retail users. Self-custody holding of PRO Tokens is technically available only to users of Ethereum blockchain compatible wallets, which are available to any person at no cost.
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	Payward Europe Solutions Limited trading as Kraken Digital Asset Exchange (Kraken)
E.34	Trading Platforms Market identifier code (MIC)	PESL — Payward Europe Solutions Limited (Kraken EU)
E.35	Trading platforms access	Users must open an account with the CASP based on CASP's terms and conditions. www.kraken.com
E.36	Involved costs	Trading platforms on which the PRO Tokens will be listed typically charge fees for their services, including trading fees, based on their terms and conditions. Holders are advised to familiarize themselves with the respective fee structure before accessing the trading platforms. Propy shall not charge any fees in this regard.
E.37	Offer expenses	Not applicable
E.38	Conflicts of interest	No conflicts of interest have been identified as of today in relation to the admission to trading of PRO Tokens.

E.39	Applicable law	California, USA
E.40	Competent court	The competent court for any legal disputes shall be the courts of California, USA, unless otherwise required by mandatory provisions of applicable consumer protection or private international law.

Part F - Information about the crypto-assets		
F.1	Crypto-asset type	Under the MiCAR taxonomy, PRO Token is a crypto-asset other than e-money token or asset referenced token.
F.2	Crypto-asset functionality	The PRO token is an ERC-20 utility token on the Ethereum blockchain. It is required to access Propy services, including minting Address NFTs, recording property deeds on-chain, tokenizing real estate assets, and enrolling in educational courses. The PRO token is used exclusively for payment of service fees and does not confer any ownership, governance, or profit rights.
F.3	Planned application of functionalities	All functionalities referred to in F.2 have already been applied. Propy may introduce additional functionalities at a later stage.

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	OTHR (Other)
F.5	The type of submission	NEWT (New)
F.6	Crypto-asset characteristics	PRO Tokens are crypto-assets other than EMTs and ARTs, which are available on the Ethereum blockchain, and are based on the ERC-20 token standard. PRO Tokens are fungible, with a total supply of 100,000,000 PRO, all of which have already been issued. PRO Tokens are a cryptographic utility token designed for use within the Propy ecosystem, providing users with access to services such as minting Address NFTs, recording property deeds on-chain, tokenizing real estate as Real World Assets (RWAs), and enrolling in educational courses for real estate professionals. The token does not represent an ownership interest, voting rights, or entitlement to revenue distribution from the Propy Platform, Propy Inc or any other entity.
F.7	Commercial name or trading name	Propy Inc.
F.8	Website of the issuer	https://propy.com

F.9	Starting date of offer to the public or admission to trading	2025-09-08 (intended)
F.10	Publication date	2025-08-18
F.11	Any other services provided by the issuer	None
F.12	Language or languages of the crypto-asset white paper	EN (English)
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	PRO
F.14	Functionally fungible group digital token identifier, where available	Not available

F.15	. Voluntary data flag	False
F.16	. Personal data flag	TRUE

F.17	. LEI eligibility	FALSE
F.18	. Home member state	Latvia

F.19	Host Member States	Austria Belgium Bulgaria Croatia Cyprus Czech Republic Denmark Estonia Finland France Germany Greece Hungary Ireland Italy 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	<u>Rights and Obligations</u> The rights and obligations associated with PRO tokens arise from: • This white paper, outlining the token's purpose and functionality; • The Terms and Conditions (T&C) of the Platform, available at https://propy.com/browse/terms-and-conditions/; • The Consideration Terms and Conditions, available at https://propy.com/browse/consideration-terms/, governing PRO rewards to Platform users; Holders of PRO tokens gain access to the utilities set out above if they comply with the prerequisite conditions for the service, also set out in 8.1. Obligations are determined by the applicable legal system but there are no obligations intrinsic to the purchase or holding of the PRO token itself.	
-----	----------------------------------	--	--

G.2	Exercise of Rights and Obligations	To exercise these rights, users must connect an Ethereum-compatible wallet, hold a sufficient balance of PRO Tokens, and, for certain services (such as deed recording and asset tokenization), complete KYC verification. There are no additional obligations imposed on token holders beyond compliance with the platform's terms of service and applicable legal requirements.	
G.3	Conditions for modifications of rights and obligations	As provided by Article 12 of Regulation (EU) 2023/1114, any significant new factor, material mistake, or material inaccuracy that is capable of affecting the assessment of the crypto-assets will be described in a modified version of this white paper, notified to the competent authorities, and published on the issuer's website.	
G.4	Future public offers	None	

G.5

Issuer retained crypto-assets

A portion of the PRO Token supply is retained by the issuer and key stakeholders.

Below are the reserved portions following the Token sale which took place in 2017:

Category	Percentage	Current Status
Sales Pool	35%	Partly distributed
Network Growth Pool	35%	Partly distributed
Company Pool	15%	Partly distributed
Donation Pool	15%	Fully distributed

As of the date of this white paper, below are the portions of the original amounts allocated to each pool which are currently still held by the issuer :

Category	Percentage
Sales Pool	15%
Network Growth Pool	55%
Company Pool	30%
Donation Pool	0%

G.6	Utility token classification	True
G.7	Key features of goods/services of utility tokens	The PRO Token provides access to: • Address NFT Minting - Users can mint a unique, gamified NFT representing a property address. These NFTs do not confer any legal rights, ownership, or claim to the underlying real-world property. • On-Chain Deed Recording - Users can record property deeds on-chain by adding a new set of metadata to the existing Address NFT. This metadata includes the IPFS Content Identifier (CID) of the deed document, which is password-protected for enhanced privacy. All deeds are verified by Propy prior to upload to ensure authenticity and accuracy. • Real World Asset Tokenization - On approval, users can tokenize full property ownership, which involves creating an LLC or equivalent legal wrapper for the NFT-represented title.
G.8	Utility tokens redemption	The PRO tokens, used for utility, can be redeemed in line with the below: Lock-Up Periods: • Agents: All PRO rewards earned by agents are subject to a 365-day lock-up period from the date of issuance. • Propy Ambassadors: PRO tokens earned by Propy Ambassadors are subject to a 6-month lock-up period. KYC Requirement: • Any account with a total balance exceeding 100 PRO tokens must complete a full Know Your Customer (KYC) process before withdrawal or transfer of tokens is permitted. Additional Withdrawal Conditions: • In order to withdraw PRO tokens, the following criteria must be met:

		• The account holder must possess a valid real estate license (This step checks against the NRDS license database and is a manual process at this time.); • Tokens must have been earned through approved platform activities as defined by Propy's reward policy; • The account must comply with all Propy platform terms, including KYC and W8/W9 form submission. • Withdrawal Limits: 1,000 PRO tokens per withdrawal and 3,000 total PRO tokens a month.
G.9	Non-trading request	True
G.10	Crypto-assets purchase or sale modalities	Not Applicable

G.11	Crypto-assets transfer restrictions	There are no transfer restrictions on PRO Tokens.
G.12	Supply adjustment protocols	False
G.13	Supply adjustment mechanisms	Not applicable.

G.14	Token value protection schemes	False
G.15	Token value protection scheme description	Not applicable.
G.16	Compensation schemes	False

G.17	Compensation scheme description	Not applicable.
G.18	Applicable law	California, US law, unless otherwise required by mandatory provisions of applicable consumer protection or private international law.
G.19	Competent court	The competent court for any legal disputes shall be the courts of California, US, unless otherwise required by mandatory provisions of applicable consumer protection or private international law.

Part H — Information on the underlying technology

H.1	istributed ledger technology (DLT)	The PRO token is issued on Ethereum, and complies with the ERC-20 standard, enabling compatibility with the Ethereum ecosystem, including wallets, smart contracts, and decentralized applications. Ethereum is a public and permissionless network, allowing unrestricted access for users and developers. This ensures transparency, interoperability, and broad usability of the token infrastructure. PRO is further available on Base and BSC (Binance Smart Chain), using canonical bridges for cross-chain transfers to reduce risk. We use Arbitrum’s native bridge for Ethereum <-> Arbitrum bridging, OPStack’s Superchain bridging system for Ethereum <-> Base, and LayerZero’s bridging system for Ethereum <-> BSC.
H.2	Protocols and technical standards	The PRO token adheres to the ERC-20 token standard as defined within the Ethereum ecosystem. This includes standardized functions for token transfers, approvals, and balance management, enabling seamless integration with compliant wallets, custody providers, and decentralized applications. Smart contract code is publicly verifiable and deployed on a transparent and auditable infrastructure. ERC-20 Token Standard The ERC-20 token standard, introduced by Fabian Vogelsteller in November 2015, has become the cornerstone of fungible token creation on the Ethereum blockchain. This technical specification defines a set of rules and functions that Ethereum-based tokens must adhere to, ensuring interoperability and compatibility across the ecosystem. By providing a standardised framework, ERC-20 has significantly simplified the process of creating and deploying tokens, allowing developers to focus on innovative applications rather than grappling with compatibility issues. <i>Core Functions of ERC-20</i> At its core, the ERC-20 standard mandates six essential functions that every compliant token must implement:

		• <code>totalSupply()</code>: Returns the total supply of the token. • <code>balanceOf(address _owner)</code>: Provides the account balance of the owner's account. • <code>transfer(address _to, uint256 _value)</code>: Transfers a number of tokens directly from the message sender to another address. • <code>transferFrom(address _from, address _to, uint256 _value)</code>: Transfers tokens from a specified address. • <code>approve(address _spender, uint256 _value)</code>: Allows a spender to withdraw a set number of tokens from a specified account. • <code>allowance(address _owner, address _spender)</code>: Returns the number of tokens a spender is allowed to withdraw from the owner's account. These functions enable basic operations such as checking token balances, transferring tokens between addresses, and allowing third-party spending. Additionally, optional functions like <code>name()</code>, <code>symbol()</code>, and <code>decimals()</code> provide descriptive information about the token. This uniformity has fostered a vibrant ecosystem of decentralised applications (dApps), exchanges, and wallets that can seamlessly interact with any ERC-20 token, driving the growth of decentralised finance (DeFi) and other blockchain-based innovations. OpenZeppelin's ERC Token Standard Libraries OpenZeppelin offers a comprehensive suite of libraries for implementing Ethereum Request for Comments (ERC) token standards, providing developers with secure and efficient tools to create compliant tokens. These libraries include implementations for popular standards such as ERC-20 for fungible tokens and ERC-721 for non-fungible tokens (NFTs). OpenZeppelin's ERC libraries are extensively audited, battle-tested, and optimised for gas efficiency, ensuring that developers can focus on building their specific token features rather than reinventing the wheel for basic functionalities. Additionally, these libraries often include optional extensions like pausable and burnable tokens, providing enhanced flexibility and security features. By leveraging OpenZeppelin's ERC libraries, developers can significantly reduce the risk of vulnerabilities and ensure compatibility with the broader Ethereum ecosystem, making them an essential tool for secure and standardised token development. OpenZeppelin <i>Standards and Interfaces Utilised</i>
--	--	--

		Apart from the main ERC-20 the PRO tokens also make use of the following OpenZeppelin standards and interfaces: • IERC5267 • IERC20Permit • IERC20Errors • IERC721Errors • IERC1155Errors • IERC20 • IERC20Metadata • Ownable
H.3	Technology used	The technology allowing for the holding, storing, and transferring crypto-assets is based on the Ethereum blockchain, and has been outlined throughout this section.
H.4	Consensus mechanism	Proof-of-Stake Consensus In Ethereum's PoS system, validators replace miners as the primary actors securing the network. Validators are participants who have staked at least 32 ETH as collateral to earn the right to propose and validate new blocks. Validator Selection and Block Proposal The PoS mechanism randomly selects validators to propose new blocks. For each slot (12 seconds), one validator is chosen as the block proposer. Simultaneously, a committee of validators is selected to attest to the proposed block's validity. Block Validation Process 1. The selected validator proposes a new block. 2. Other validators in the network receive and verify the block. 3. If the majority of validators agree on the block's validity, it is added to the blockchain.

		4. The block proposer and attestors receive rewards in ETH for their participation. Security and Finality Ethereum's PoS implements a concept called "finality" to ensure the immutability of transactions: 1. Checkpoints occur at the start of each epoch (32 slots or about 6.4 minutes). 2. When two consecutive checkpoints receive votes from at least 66% of the total staked ETH, the earlier checkpoint becomes finalised. This finality mechanism makes it extremely costly and difficult for attackers to alter the blockchain, as they would need to control a significant portion of the staked ETH. Staking and Rewards Validators earn rewards for their participation in the consensus process. The current annual staking yield ranges from approximately 2.23% to 4%. This incentive structure encourages honest behavior and network participation. Slashing To maintain network integrity, Ethereum implements a penalty system called slashing. Validators who act maliciously or fail to perform their duties can have a portion of their staked ETH destroyed, ensuring that there are economic consequences for harmful behavior. In conclusion, Ethereum's PoS consensus mechanism has significantly enhanced the network's efficiency, security, and scalability while drastically reducing its environmental impact. As the Ethereum ecosystem continues to evolve, this consensus mechanism forms the foundation for future improvements and innovations in the platform.
H.5	Incentive mechanisms and applicable fees	Users on Base pay Layer 2 transaction fees for execution and Layer 1 posting fees for data availability on Ethereum. These fees are significantly lower than on Layer 1 due to batching and compression. Fee structures may include: • L2 execution fees • L1 data posting fees • Application-specific service fees (e.g. token issuance)

		Base leverages the efficiency of the OP Stack while maintaining Ethereum-grade security, ensuring scalability and economic sustainability for applications built on top.
H.6	Use of Distributed Ledger Technology	False.
H.7	DLT Functionality Description	Not applicable.
H.8	Audit	TRUE.

H.9	Audit outcome	The Propy Token (PRO) audit completed in July 2025. The goal was to find vulnerabilities in the already deployed contract. PropyToken has dependencies on EventsHistory, EToken2, and AssetWithWhitelist, so it's added to the review scope. The audit shows no critical bugs or vulnerabilities were found in the smart contract system.
-----	---------------	--

Part I — Information on risks		
I.1	Offer-related risks	<u>Issuer-related Risks:</u> The value and functionality of the PRO Token are directly tied to the actions and success of Propy Inc. If Propy fails, ceases operations, or cannot maintain its platform and services, the PRO token may lose its intended utility and could become worthless. <u>Financial Stability and Operational Risks:</u> The PRO token's value depends on the financial health and operational capabilities of Propy Inc. If the company faces liquidity shortages, funding difficulties, or rising operational costs, it may impact the platform's development and service continuity, thereby reducing the Token's usability and demand. <u>Dependence on Key Personnel:</u> The success of Propy Inc. relies in a significant manner on its leadership and technical expertise. The loss of key personnel – especially those in executive or technology roles – could disrupt operations and impact the company's ability to meet its commitments. A lack of succession planning could exacerbate this risk. <u>Strategic and Business Model Risks:</u> The tokenization industry is highly dynamic, requiring continuous adaptation to evolving regulations, customer needs, and technological advancements. If Propy Inc fails to align its business model with market trends, it may experience reduced platform adoption, negatively affecting the demand and utility of the PRO token. <u>Risk of Competitors:</u>

		Other companies may replicate or improve upon Propy’s business model, potentially reducing its market share. Increased competition could limit platform adoption and the effectiveness of the PRO token’s utilities and benefits. <u>Regulatory Compliance and Legal Risks (MiCAR Compliance):</u> As the issuer of a utility token and the operator of the Platform, Propy is subject to various legal and regulatory regimes, including Markets in Crypto-Assets Regulation (MiCAR) and other relevant financial regulations. Changes in regulatory frameworks specific to token issuance, tokenized financial instruments, or financial services may impose additional compliance obligations, operational constraints, or legal risks. Regulatory changes or non-compliance could impact the functionality of PRO and its market acceptance. <u>Custodial and Reimbursement Risks:</u> The PRO token is primarily designed for self-custody, meaning purchasers are responsible for securing their assets. If tokens are stored with third-party custodians, e.g. a crypto asset trading platform, there is a risk of insolvency, security breaches, or operational failures of such third party providers, potentially affecting token retrieval. Additionally, reimbursement mechanisms mandated under MiCAR require proper execution, and delays or technical issues may affect timely refunds. <u>Liquidity and Listing Risks:</u> While PRO is already listed on various crypto asset trading platforms, and the Company is currently seeking to expand such listing to additional platforms, including ones within the EU, listing does not guarantee active market participation or liquidity. Token holders may experience difficulty in selling their PRO Tokens at desired prices due to no or low trading volumes or price slippage. <u>Risk of Conflicts of Interest:</u> Propy Inc retains a significant portion of PRO Tokens for ecosystem development and liquidity provision. The company’s decisions regarding token sales, strategic reserves, or other trading activities may impact the market price and investor confidence. <u>Management and Governance Risks:</u> Poor strategic decisions, lack of governance oversight, or mismanagement of financial and operational resources could affect the long-term viability of Propy and, consequently, the PRO Token. In an extreme case, insolvency of Propy could render the PRO token non-functional. <u>Reputation Risk:</u>
--	--	---

		Negative publicity, legal disputes, regulatory investigations, or service failures could impact the reputation of Propy, leading to loss of confidence in the Platform and the PRO token. A deterioration in public perception may reduce demand and adoption of the Token.
I.2	Issuer-related risks	Not applicable, as the issuer is the same as the person seeking admission to trading (see I.1).
I.3	Crypto-assets related risks	The PRO token, as a utility token, is subject to various risks that may affect its valuation, liquidity, security, regulatory status, and overall usability. The following risks outline key factors that could impact the token and its holders. <u>Market Volatility:</u> The market price of PRO may fluctuate significantly due to demand, usability within the Platform, and broader crypto-market conditions. Volatility may result from external economic factors, regulatory changes, or shifts in investor sentiment. These fluctuations can cause token prices to drop and even become worthless within a very short period of time. <u>Trading Risks:</u>

		There is no guarantee of sufficient liquidity or trading volume in the Token on any (or all) trading platforms, which could impact the ability of holders to sell or trade PRO Tokens at desired prices. Additionally, prices may be subject to high volatility, price slippage, and potential market manipulation. <u>No Redemption:</u> The PRO token is not redeemable against Propy Inc, the Platform or any Propy entity or service, for fiat currency, any other crypto asset or any other asset within the platform. <u>Limited Utility and Usability Outside the Platform:</u> The PRO Token serves as a utility token on the Propy Platform, and has to use or utility outside of the Platform. The prices for these services are determined directly by Propy. While PRO Tokens are freely transferable, their value and demand are directly tied to platform adoption and service usage, determined by Propy. A decline in user engagement or tokenization services could reduce token demand. <u>Dependence on Blockchain Infrastructure:</u> The PRO token is issued Ethereum, and complies with the ERC-20 standard, enabling compatibility with the Ethereum ecosystem, including wallets, smart contracts, and decentralized applications. Ethereum is a public and permissionless network, allowing unrestricted access for users and developers. This ensures transparency, interoperability, and broad usability of the token infrastructure. PRO is further available on Base and BSC (Binance Smart Chain), using canonical bridges for cross-chain transfers to reduce risk. We use Arbitrum's native bridge for Ethereum <-> Arbitrum bridging, OPStack's Superchain bridging system for Ethereum <-> Base, and LayerZero's bridging system for Ethereum <-> BSC. This means that the PRO Token's functionality is dependent on the stability, security, and efficiency of the applicable underlying blockchain network. Risks associated with blockchain infrastructure include: • Network congestion or technical failures, which may impact transaction speed and increase transaction costs. • Potential blockchain forks or protocol changes, which could require adjustments to PRO's smart contracts, reliance on third-party nodes and validators, introducing risks related to centralization, validator failures, or malicious activities. <u>Blockchain Security Risks:</u> As a blockchain-based asset, the PRO token is exposed to cybersecurity risks, including hacking, data breaches, or smart contract vulnerabilities. If the underlying smart contracts contain flaws, they could be exploited by malicious actors, leading to financial losses for token holders. Despite security audits, unforeseen vulnerabilities could still pose risks to token security and functionality. <u>Jurisdictional Restrictions:</u>
--	--	---

		Regulations regarding crypto-assets vary across different jurisdictions. Some countries may impose restrictions on the trading, holding, or usage of PRO Tokens and/or the use of the Platform. Purchasers must ensure that they comply with local legal requirements before acquiring or using the token. To enjoy the utilities of the PRO token, the holder must have access to the Platform and be eligible to use it. In addition to other limitations which may be applicable, the Platform explicitly prohibits the use of the Platform (including the PRO utilities) to persons from restricted jurisdictions, which include, as of the date hereof: Belarus, Central African Republic, Cote d'Ivoire (Ivory Coast), Cuba, Democratic Republic of the Congo, Iran, Iraq, Lebanon, Liberia, Libya, Myanmar (Burma), North Korea, Somalia, Sudan, Syria, Zimbabwe. <u>Innovation and Market Relevance Risk:</u> The blockchain and tokenization industry is evolving rapidly. Emerging technologies, new regulatory frameworks, or competitive solutions may affect the long-term relevance of the Propy Platform and of the PRO token. If Propy fails to continuously adapt to industry trends, the Token's value and demand may decline over time. <u>Lack of Ownership or Governance Rights:</u> Holding PRO tokens does not grant equity, voting rights, or decision-making control over Propy Inc or the Propy Platform. Token holders have no influence over business strategies, pricing models, or platform governance. Changes to platform fees, services, or token utility may occur without direct input from PRO holders.
I.4	Project implementation-related risks	<u>Scalability and Performance Risk</u> As adoption of the Propy Platform increases, scalability and performance limitations may emerge. High transaction volumes or unexpected demand surges could lead to network congestion, slower processing times, or degraded platform performance. These issues could limit the usability of the PRO token, affecting user experience and overall market confidence. <u>Dependence on External Partnerships and Service Providers</u> Propy relies on third-party service providers and technology partners for critical functions, including blockchain infrastructure, liquidity provision, and regulatory compliance services. Failures, security breaches, insolvency, or operational issues affecting these external providers could disrupt platform services, impacting the utility and availability of the PRO token. <u>Funding Risks</u> The further development and maintenance of the Platform require sufficient financial resources. Propy depends on revenues generated from use of the Platform, external funding, and market adoption. Economic downturns, reduced market confidence, or unexpected financial challenges could impact the company's ability to sustain platform operations and technological advancements. <u>Technological and Integration Risk</u>

		Integrating blockchain-based infrastructure with existing financial and legal systems presents technological and compatibility challenges. Changes in blockchain protocols, security vulnerabilities, or unforeseen technical constraints could delay or restrict platform features, directly affecting the usability of the PRO token. <u>Regulatory Compliance for Project Implementation</u> The legal and regulatory landscape for tokenization and blockchain services continues to evolve. New regulatory requirements or changes in interpretation could impose additional compliance burdens on Propy. This may include restrictions on token offerings, modifications to token-based services, or new licensing requirements. Non-compliance with these regulations could lead to penalties, service limitations, or operational restrictions, all of which could affect the functionality and marketability of the PRO token.
I.5	Technology-related risks	<u>Blockchain and Smart Contract Vulnerability</u> The PRO Token’s smart contracts are susceptible to coding vulnerabilities, bugs, or security flaws that could be exploited by malicious actors. A breach in the smart contract could result in unauthorized transactions, token loss, or manipulation of onchain mechanisms, affecting the Token’s security and trust among holders. Even though security audits are conducted, unforeseen vulnerabilities may still pose a risk. <u>Cybersecurity and Data Breach Risks</u> As a blockchain-based asset, the PRO token is exposed to cybersecurity threats such as hacking, phishing attacks, and data breaches. If attackers compromise Propy’s infrastructure or the wallets of token holders, this could result in financial losses, operational disruptions, and reputational damage. <u>Dependency on Underlying Blockchain Stability and Performance</u> The PRO Token operates on the Base blockchain (ERC-20 standard), meaning its functionality depends on the stability and efficiency of this network. Risks include: • Network congestion, which may lead to higher transaction fees or slower confirmation times. • Technical failures, blockchain reorgs, or forks, which could impact token transfers and staking mechanisms. • Reliance on third-party validators and node operators, which may introduce security vulnerabilities or service disruptions. <u>Wallet and Private Key Risk</u> PRO Token holders are responsible for the custody of their tokens in a compatible cryptographic wallet and for securing their private keys. Loss of a private key means permanent loss of access to the PRO Tokens, with no possibility of recovery. If a holder connects their wallet to malicious applications or platforms, they risk unauthorized access to their assets. <u>Technology Obsolescence Risk</u>

		Blockchain technology is rapidly evolving. If Propy's Platform does not adapt to new standards, interoperability solutions, or emerging security protocols, the PRO token's utility and competitive relevance may diminish over time. New blockchain innovations could introduce more efficient tokenization models, potentially reducing demand for the PRO token. <u>Risk of Technical Failures and Downtime</u> Technical issues, such as server outages, software bugs, or API failures, could lead to platform downtime, transaction delays, or staking errors. If prolonged, such failures may disrupt user confidence and limit access to the PRO token's functionality. <u>Data Privacy and Compliance Risk</u> Propy processes user data in compliance with applicable data protection laws. Failure to adequately protect user information could lead to regulatory penalties, loss of user trust, and potential restrictions on platform operations. Any data breaches or non-compliance with privacy regulations may impact the long-term adoption of PRO token-based services.
I.6	Mitigation measures	<u>Smart Contract Audits and Security Measures</u> PRO Token audit completed in July 2025. These audits aim to identify and mitigate vulnerabilities in the code, ensuring the secure execution of PRO Token-related on-chain activities. Regular internal security reviews and updates will be conducted to maintain the integrity of smart contracts. <u>Cybersecurity Framework</u> Propy Inc has implemented a multi-layered cybersecurity strategy, including encryption, regular security assessments, and robust access control measures. Protection against phishing attacks, malware, and unauthorized access is prioritized to safeguard both platform operations and user assets. <u>Incident Response and Contingency Planning</u> Propy has implemented procedures to address potential security breaches, smart contract failures, and operational disruptions. This includes predefined escalation procedures, forensic analysis protocols, and corrective action mechanisms to minimize potential damages. <u>Compliance with Regulatory Standards</u> The PRO token is expected to be listed for trading on EU-regulated platforms, under the Markets in Crypto-Assets Regulation (MiCAR) framework. and aligns with applicable EU regulations for crypto-assets. Compliance measures

		include monitoring regulatory developments, implementing necessary legal adjustments, and ensuring adherence to financial and anti-money laundering (AML) obligations. <u>Blockchain Stability and Redundancy Measures</u> To mitigate risks associated with blockchain network congestion or disruptions, the PRO token is issued on the Ethereum blockchain. The platform maintains contingency protocols to address potential forks, blockchain failures, or network security concerns. <u>Governance and Internal Risk Management</u> To address risks related to financial stability, operational continuity, and strategic decision-making, Propy Inc has established internal governance structures and risk monitoring frameworks. Key areas of focus include liquidity management, revenue planning, and continuous evaluation of business risks. <u>Continuous Market Monitoring and Ecosystem Adaptation</u> The Propy Platform actively monitors market conditions, technological advancements, and competitive developments to ensure long-term relevance. Adjustments to platform features, pricing models, and token utility will be made in response to evolving industry trends and regulatory requirements.
--	--	--

Part J – Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts		
J1	Adverse impacts on climate and other environment-related adverse impacts	Information referred to Commission Delegated Regulation (EU) 2025/422 with regard to regulatory technical standards specifying the content, methodologies and presentation of information in respect of sustainability indicators in relation to adverse impacts on the climate and other environment-related adverse impacts (see Section S Below)

Mandatory information on principal adverse impacts on the climate and other environment-related adverse impacts of the consensus mechanism		
N	Field	Content
General Information		
S.1	Name	Propy Inc.
S.2	Relevant legal entity identifier	N/A
S.3	Name of the crypto assets	Propy Token (PRO)
S.4	Consensus Mechanism	N/A. Tokens do not have their own consensus mechanisms. PRO's consensus mechanism relies on Ethereum as its base layer, ultimately utilising a Proof of Stake (PoS) consensus mechanism.
S.5	Incentive Mechanisms and Applicable Fees	N/A. Tokens do not have incentive mechanisms to secure transactions nor associated fees, as this is handled by the base layers.
S.6	Beginning of the period to which the disclosure relate	2024-07-28
S.7	End of the period to which the disclosure relates	2025-07-28

Mandatory key indicator on energy consumption		
S.8	Energy consumption	107.70358 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. 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.
Supplementary key indicators on energy and GHG emissions		
S.10	Renewable energy consumption	26.5386870830 %
S.11	Energy intensity	0.00004 kWh per transaction
S.12	Scope 1 DLT GHG emissions – controlled	0.00000 tCO2e/a per calendar year
S.13	Scope 2 DLT GHG emissions – purchased	0.03492 tCO2e/a per calendar year
S.14	GHG Intensity	0.00002 kgCO2e per transaction

Sources and methodologies		
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.