This white paper has been prepared in compliance with the requirements of the Commission Implementing Regulation 2024/2984 of 29 November 2024 implementing technical standards for the application of Regulation (EU) 2023/1114 of the European Parliament and of the Council with regard to forms, formats and templates for the crypto-asset White Paper

Across Protocol (ACX) Token White Paper

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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
00	Table of contents		Alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		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** C.1 Name C.2 Legal form C.3 Registered address C.4 Head office C.5 Registration Date C.6 Legal entity identifier C.7 Another identifier required pursuant to applicable national law C.8 Parent company C.9 Reason for crypto-Asset white paper Preparation C.10 Members of the Management body C.11 Operator business activity C.12 Parent company business activity C.13 Other persons drawing up the crypto-asset white paper according to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114 C.14 Reason for drawing the white paper by persons referred to in Article 6(1), second subparagraph, of Regulation (EU) 2023/1114 **Part D - Information about the crypto-asset project** D.1 Crypto-asset project name D.2 Crypto-assets name D.3 Abbreviation D.4 Crypto-asset project description D.5 Details of all natural or legal persons involved in the implementation of the crypto-asset project	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		D.6 Utility Token Classification D.7 Key Features of Goods/Services for Utility Token Projects D.8 Plans for the token D.9 Resource Allocation D.10 Planned use of Collected funds or crypto-Assets **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 E.2 Reasons for public offer or admission to trading E.3 Fundraising target E.4 Minimum subscription goals E.5 Maximum subscription goals E.6 Oversubscription acceptance E.7 Oversubscription allocation E.8 Issue price E.9 Official currency or any other crypto-assets determining the issue price E.10 Subscription fee E.11 Offer price determination msod E.12 Total number of offered/traded crypto-assets E.13 Targeted holders E.14 Holder restrictions E.15 Reimbursement notice E.16 Refund mechanism E.17 Refund timeline E.18 Offer phases E.19 Early purchase discount E.20 Time-limited offer E.21 Subscription period beginning E.22 Subscription period end E.23 Safeguarding arrangements for offered funds/crypto-Assets	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		E.24 Payment methods for crypto-asset purchase E.25 Value transfer methods for reimbursement E.26 Right of withdrawal E.27 Transfer of purchased crypto-assets E.28 Transfer time schedule E.29 Purchaser's technical requirements E.30 Crypto-asset service provider (CASP) name E.31 CASP identifier E.32 Placement form E.33 Trading platforms name E.34 Trading platforms Market identifier code (MIC) E.35 Trading platforms access E.36 Involved costs E.37 Offer expenses E.38 Conflicts of interest E.39 Applicable law E.40 Competent court **Part F - Information about the crypto-assets** F.1 Crypto-asset type F.2 Crypto-asset functionality F.3 Planned application of functionalities F.4 Type of crypto-asset white paper F.5 The type of submission F.6 Crypto-asset characteristics F.7 Commercial name or trading name F.8 Website of the issuer F.9 Starting date of offer to the public or admission to trading F.10 Publication date F.11 Any other services provided by the issuer F.12 Language or languages of the crypto-asset white paper F.13 Digital token identifier code used to uniquely identify the crypto-asset or each of the	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		several crypto assets to which the white paper relates, where available F.14 Functionally fungible group digital token identifier, where available F.15 Voluntary data flag F.16 Personal data flag F.17 LEI eligibility F.18 Home Member State F.19 Host Member State **Part G - Information on the rights and obligations attached to the crypto-assets** G.1 Purchaser rights and obligations G.2 Exercise of rights and obligations G.3 Conditions for modifications of rights and obligations G.4 Future public offers G.5 Issuer retained crypto-assets G.6 Utility token classification G.7 Key features of goods/services of utility tokens G.8 Utility tokens redemption G.9 Non-trading request G.10 Crypto-assets purchase or sale modalities G.11 Crypto-assets transfer restrictions G.12 Supply adjustment protocols G.13 Supply adjustment mechanisms G.14 Token value protection schemes G.15 Token value protection schemes description G.16 Compensation schemes G.17 Compensation schemes description G.18 Applicable law G.19 Competent court **Part H – Information on the underlying technology** H.1 Distributed ledger technology (DLT)	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		H.2 Protocols and technical standards H.3 Technology used H.4 Consensus mechanism H.5 Incentive mechanisms and applicable fees H.6 Use of distributed ledger technology H.7 DLT functionality description H.8 Audit H.9 Audit outcome **Part I – Information on risks** I.1 Offer-related risks I.2 Issuer-related risks I.3 Crypto-assets-related risks I.4 Project implementation-related risks I.5 Technology-related risks I.6 Mitigation measures **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	
01	Date of notification	2025–[XX]–[XX]	YYYY-MM-DD
02	Statement in accordance with Article 6(3) of Regulation (EU) 2023/1114	Regarding offerors: This crypto-asset white paper has not been approved by any competent authority in any Member State of the European Union. The operator of the trading platform of the crypto-asset is solely responsible for the content of this crypto-asset white paper.	Predefined alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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.	Predefined alphanumerical text
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.	Predefined alphanumerical text
05	Statement in accordance with Article 6(5), point (d), of Regulation (EU) 2023/1114	true The utility token referred to in this white paper may not be exchangeable against the good or service promised in this white paper, especially in the case of a failure or discontinuation of the crypto-asset project.	‘true’ – Yes ‘false’ – Not applicable If Yes, Predefined alphanumerical text
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.	Predefined alphanumerical text
SUMMARY			

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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.	Predefined alphanumerical text
08	Characteristics of the crypto-asset	The Across Protocol (“**ACX**”) token is a utility token as defined by Article 3(1)(9) of Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on markets in crypto-assets (“MiCA”). Across Protocol (ACX) is the native utility and governance token of the Across cross-chain bridging protocol, which facilitates capital-efficient, fast, and secure transfers of crypto-assets across multiple Ethereum-compatible Layer 1 and Layer 2 networks. ACX is deployed on the Ethereum blockchain and operates as an ERC-20 token. The ACX token is used to incentivise participation in the Across network, support its	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		governance framework, and reward relayers and liquidity providers. It plays a central role in enabling decentralised decision-making and sustaining the protocol's operational ecosystem. The token can be used to vote on proposals affecting bridge fees, security parameters, incentive structures, and network upgrades, making it integral to the protocol's ongoing decentralisation.	
09		Not applicable	Free alphanumerical text
10	Key information about the offer to the public or admission to trading	https://coinmarketcap.com/currencies/across-protocol/ ACX was launched on the Ethereum blockchain and admitted to trading via decentralised and centralised exchanges on 28 November 2022. The launch followed the conclusion of an airdrop campaign aimed at rewarding early users of the Across bridge and contributors to the ecosystem. As of 2025-04-07, ACX has a circulating supply of approximately 407,706,120 tokens out of a fixed maximum supply of 1,000,000,000 ACX tokens. The token is actively traded on major centralised exchanges, as well as on decentralised exchanges. ACX was not launched through a formal public sale or initial coin offering (ICO). Instead, distribution was achieved through a combination of community incentives, protocol usage, airdrops, and ecosystem development grants. The token's admission to trading was intended to support decentralised governance, incentivise liquidity provision and	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		relayer participation, and enhance accessibility to the Across bridging protocol. No liquidity was burnt at launch. Token allocations are governed by transparent smart contracts and subject to time-based vesting schedules for strategic stakeholders.	
Part A - Information about the offeror or the person seeking admission to trading			
A.1	Name	Across Protocol (operated by Risk Labs Foundation)	Free alphanumerical text
A.2	Legal form	Foundation	ISO standard 20275 ‘Financial Services – Entity Legal Forms (ELF)’
A.3	Registered address	Ontario, Canada	ISO standard 3166-1 alpha 2 country codes and codes for their subdivisions and Free alphanumerical text
A.4	Head office	Not publicly available information	ISO standard 3166-1 alpha 2 country codes and codes for their subdivisions and Free alphanumerical text
A.5	Registration date	Not applicable]	ISO 8601 date format (YYYY-MM-DD)
A.6	Legal entity identifier	Not applicable	{LEI}

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
A.7	Another identifier required pursuant to applicable national law	Not applicable	Free text
A.8	Contact telephone number	Not publicly available information	Free alphanumerical text
A.9	E-mail address	legal@across.to / hello@risklabs.co	Free alphanumerical text
A.10	Response time (Days)	Not publicly available information	{DURATION}
A.11	Parent company	Not applicable	Free alphanumerical text
A.12	Members of the management body	Hart Lambur: Co-Founder Allison Lu: Co-Founder Matthew Rice: Chief Technology Officer (CTO) Melissa Quinn: Chief Operations Officer (COO) Kevin Chan: Treasurer Manny Narang: Head of Sales	Free alphanumerical text presented in a tabular format
A.13	Business activity	Risk Labs, through the Across Protocol, develops and maintains a cross-chain bridge designed to enable secure and efficient asset transfers between Ethereum and its Layer 2 networks. The protocol is decentralised, non-custodial, and governed by token holders through the ACX token. Key activities include smart contract deployment, incentive design, governance tooling, and decentralised infrastructure development.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
A.14	Parent company business activity	Not applicable	Free alphanumerical text
A.15	Newly established	false	‘true’ – Yes ‘false’ – No
A.16	Financial condition for the past three years	Not applicable	Free alphanumerical text
A.17	Financial condition since registration	Not applicable	Free alphanumerical text
Part B - Information about the issuer, if different from the offeror or person seeking admission to trading			
Not applicable			

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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	Revolut Digital Assets Europe Ltd	Free alphanumerical text
C.2	Legal form	Legal entity	ISO standard 20275 'Financial Services – Entity Legal Forms (ELF)'
C.3	Registered address	Pikioni, 10 Flat/Office 5, 3075, Limassol, Cyprus	ISO standard 3166-1 alpha 2 country codes and codes for their subdivisions and Free alphanumerical text
C.4	Head office	Pikioni, 10 Flat/Office 5, 3075, Limassol, Cyprus	ISO standard 3166-1 alpha 2 country codes and codes for their subdivisions and Free alphanumerical text
C.5	Registration date	2022-08-09	ISO 8601 date format (YYYY-MM-DD)
C.6	Legal entity identifier	549300ET4IUR6RCZOL84	{LEI}
C.7	Another identifier required pursuant to applicable national law	Company registration number: HE430310	Free text
C.8	Parent company	Revolut Group Holdings Ltd	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
C.9	Reason for crypto-asset white paper Preparation	This crypto-asset white paper has been drawn up in accordance with the requirements of Article 4, Article 6 and Article 8 of Regulation (EU) 2023/1114.	Free alphanumerical text
C.10	Members of the Management body	Mr Costas Michael (CEO) Mr Christos Drakos (CFO) Mr Ioannis Ashiotis (NED) Mr Konstantinos Adamos (NED)	Free alphanumerical text presented in a tabular format
C.11	Operator business activity	Revolut Digital Assets Europe Ltd is a financial technology company registered as a crypto-assets services provider by the Cyprus Securities and Exchange Commission. Revolut Digital Assets Europe Ltd provides crypto-asset services across the European Union, including buying, selling, and exchange of crypto-assets. Revolut Digital Assets Europe Ltd has applied to the Cyprus Securities and Exchange Commission for a crypto-asset services provider (CASP) authorisation under Regulation (EU) 2023/1114. The authorisation is expected to cover the following crypto-asset services: ● exchange of crypto-assets for funds ● exchange of crypto-assets for crypto-assets ● operation of a Trading Platform ● custody and administration of crypto-assets ● transfer of crypto-assets	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
C.12	Parent company business activity	Revolut Digital Assets Europe Ltd is a wholly-owned subsidiary of Revolut Group Holdings Ltd, a private company limited by shares registered in England and Wales (company number: 12743269)	Free alphanumerical text
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	Free alphanumerical text
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	Free alphanumerical text
Part D- Information about the crypto-asset project			
D.1	Crypto-asset project name	Across Protocol (ACX)	Free alphanumerical text
D.2	Crypto-assets name	See DTI in F.13	Free alphanumerical text
D.3	Abbreviation	See DTI in F.13	Free alphanumerical text
D.4	Crypto-asset project description	**Summary** Across Protocol (ACX) is the native utility and governance token of the Across bridging protocol, a decentralised infrastructure designed to facilitate fast, capital-efficient, and secure cross-chain transfers between Ethereum Layer 1 and multiple Layer 2 scaling solutions. The protocol was developed by Risk Labs, and ACX serves as the foundation for community governance, protocol incentives, and ecosystem coordination.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		ACX empowers holders to participate in the decentralised governance of Across, vote on protocol upgrades, and influence the allocation of incentives and fees. The token aligns stakeholder interests and enables the protocol to scale in an efficient manner. **Tokenomics** ACX has a fixed maximum supply of 1,000,000,000 tokens. As of April 2025, the circulating supply is approximately 407,706,120 tokens. The distribution is structured as follows: ● Community and Ecosystem Incentives: Distributed to protocol users, relayers, and liquidity providers. ● DAO Treasury: Reserved for governance-directed expenditures, grants, and long-term protocol sustainability. ● Team and Contributors: Allocated to core contributors and Risk Labs, subject to time-based vesting schedules. ● Investors: Allocated to early backers and strategic supporters of the protocol. ● Airdrop: A portion of tokens were distributed to early users of the Across bridge to reward adoption and engagement. All token allocations are governed by smart contracts and transparently documented through governance proposals and on-chain monitoring tools. **Roadmap**	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Across Protocol has outlined a roadmap focused on protocol efficiency, decentralisation, and ecosystem expansion: ● Multi-Chain Expansion: Continued integration with additional Layer 2 networks and Ethereum sidechains to support broader asset interoperability. ● Governance Maturity: Full decentralisation of protocol governance through the ACX DAO, allowing token holders to control fee structures, bridge parameters, and incentive design. ● Relayer Network Enhancements: Improvements to the relayer ecosystem, including optimisation of bonding and settlement mechanisms. ● Liquidity Growth Initiatives: Incentivised programmes to deepen liquidity pools across partner protocols and DEXs. ● Security and Auditing: Ongoing investment in smart contract audits, bug bounties, and protocol-level security.	
D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project	See A.12 for the management team	Free alphanumerical text presented in a tabular format
D.6	Utility Token Classification	true	‘true’ – Yes ‘false’ – No
D.7	Key Features of Goods/Services for Utility Token Projects	ACX provides several core functions within the Across ecosystem:	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		• Governance: ACX token holders can propose and vote on protocol upgrades, fee changes, incentive allocations, and treasury management. • Incentives: Used to reward relayers, liquidity providers, and ecosystem participants for contributing to the protocol's efficiency and security. • Ecosystem Funding: Facilitates grants and development support via the DAO treasury. • Protocol Alignment: Encourages long-term alignment between users, contributors, and stakeholders.	
D.8	Plans for the token	ACX is intended to become the central coordination mechanism for the Across ecosystem. Its future will be guided by community governance via the ACX DAO, which will determine all key protocol decisions. Long-term plans include expanding governance capabilities, deepening integrations with cross-chain ecosystems, and enhancing token utility across DeFi platforms.	Free alphanumerical text
D.9	Resource allocation	The initial ACX distribution occurred in November 2022, following a community airdrop. As of April 2025, the circulating supply is approximately 407,706,120 tokens, with the remainder allocated across team, investor, and treasury wallets under long-term vesting. These allocations are transparently managed via smart contracts and monitored through community governance and blockchain explorers.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
D.10	Planned use of collected funds or crypto-assets	Tokens held by the ACX DAO and related treasury contracts are intended to be used for: ● Protocol Development and Upgrades: Funding engineering efforts and the expansion of bridge functionality. ● Ecosystem Incentives: Supporting relayers, liquidity providers, and partner integrations. ● Security Audits and Infrastructure: Ongoing investment in protocol security and operational resilience. ● Community Grants and DAO Proposals: Funding community-led initiatives and governance-approved programmes. ● Long-Term Treasury Management: Ensuring the sustainable growth and stability of the protocol. All expenditures are subject to DAO governance and executed via on-chain proposals approved by ACX token holders.	Free alphanumerical text
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	ATTR	‘OTPC’ - offer to the public ‘ATTR’ - admission to trading
E.2	Reasons for public offer or admission to trading	The admission of ACX to trading was intended to support the decentralised governance of the Across Protocol, incentivise participation by early adopters, and facilitate wider accessibility to the protocol’s bridging infrastructure. ACX was not offered to the public through a formal token sale. Instead, it was distributed via an	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		airdrop to early users, liquidity providers, and relayers, followed by listings on both decentralised and centralised exchanges. The objective of these listings was not capital-raising, but rather to empower the Across community, promote decentralised coordination, and encourage adoption of the protocol. Liquidity was bootstrapped post-launch through ecosystem incentives, with no centralised fundraising tied to the token launch.	
E.3	Fundraising target	ACX does not have a formal fundraising target associated with its token launch. Token allocations to strategic investors and protocol stakeholders were predefined and conducted off-chain through treasury-managed distribution, not via a public offering.	Amount in monetary value {DECIMAL-18/3} Or Numerical {INTEGER-n}
E.4	Minimum subscription goals	Not applicable	Amount in monetary value {DECIMAL-18/3} or Numerical {INTEGER-n}
E.5	Maximum subscription goals	Not applicable	Amount in monetary value {DECIMAL-18/3} or Numerical {INTEGER-n}
E.6	Oversubscription acceptance	False	'true'- Yes 'false' – No
E.7	Oversubscription allocation	Not applicable	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.8	Issue price	0.08	Amount in monetary value{DECIMAL-18/3} Or Numerical {INTEGER-n}
E.9	Official currency or any other crypto-assets determining the issue price	USD, USDT and ETH	{CURRENCYCODE_3} or {DTI}
E.10	Subscription fee	0	Amount in monetary value {DECIMAL-18/3} Or Numerical {INTEGER-n}
E.11	Offer price determination method	The token price was established via market-based dynamics using automated market maker (AMM) models on decentralised exchanges and order book mechanisms on centralised exchanges. There was no fixed subscription price or ICO structure.	Free alphanumerical text
E.12	Total number of offered/traded crypto-assets	As of 2025-04-07, approximately 407,706,120 ACX tokens are in circulation, out of a fixed maximum supply of 1,000,000,000 tokens.	Numerical {INTEGER-n}
E.13	Targeted holders	ALL	‘RETL’ – retail investors ‘PROF’ – professional investors ‘ALL’ – all types of investors
E.14	Holder restrictions	There are currently no formal restrictions on who may hold or trade ACX tokens. However, access may be restricted by exchange platforms or national laws.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.15	Reimbursement notice	Purchasers participating in the offer to the public of crypto-asset will be able to be reimbursed if the minimum target subscription goal is not reached at the end of the offer to the public, if they exercise the right to withdrawal provided for in Article 13 of Regulation (EU) 2023/1114.	Predefined alphanumerical text
E.16	Refund mechanism	Not applicable	Free alphanumerical text
E.17	Refund timeline	Not applicable	Free alphanumerical text
E.18	Offer phases	Not applicable	Free alphanumerical text
E.19	Early purchase discount	Across Protocol offered early purchase opportunities through its Success Token Sale in November 2022. This sale raised $10 million by selling 50 million Success Tokens at $0.20 each. Each Success Token combined 1 ACX token with a call option struck at $0.50. At maturity, investors would receive the ACX token plus the value of the call option, aligning their incentives with the protocol's success. This structure allowed investors to gain leveraged upside to ACX while avoiding selling tokens at a discount on day one.	Free alphanumerical text
E.20	Time-limited offer	false	‘true’- Yes ‘false’ – No
E.21	Subscription period beginning	2022-11-28	ISO 8601 date format (YYYY-MM-DD)

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.22	Subscription period end	2022-11-28	ISO 8601 date format (YYYY-MM-DD)
E.23	Safeguarding arrangements for offered funds/crypto- Assets	Across Protocol does not employ centralised custodians for the ACX token. The project operates in a decentralised and non-custodial manner, with safeguarding ensured through the Ethereum blockchain's permissionless infrastructure and smart contracts deployed by Risk Labs and governed by the Across DAO. Tokens are stored in self-custodial wallets controlled by users, and contract interactions are transparently managed via on-chain governance mechanisms. Exchange platforms listing ACX may implement additional security measures, including AML/KYC compliance, user authentication, and multi-signature custody depending on their operational policies.	Free alphanumerical text
E.24	Payment methods for crypto-asset purchase	ACX can be purchased using the following payment methods, depending on the platform where the token is listed: 1. **Cryptocurrency-to-Cryptocurrency** ACX is available on decentralised exchanges (DEXs) and centralised exchanges (CEXs). Users commonly swap ETH or USDT for ACX. 2. **Stablecoins** ACX may be traded against stablecoins on various DEXs and CEXs. 3. **Fiat-to-Crypto Purchases (via Centralised Exchanges)** On certain platforms, users can deposit fiat currencies to acquire ETH or USDT, which can subsequently be used to	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		purchase ACX. 4. **Peer-to-Peer** Users may also transfer ACX directly via Ethereum wallet-to-wallet transfers using self-custodial wallets.	
E.25	Value transfer methods for reimbursement	Not applicable	Free alphanumerical text
E.26	Right of withdrawal	Not applicable	Free alphanumerical text
E.27	Transfer of purchased crypto-assets	ACX tokens are fully transferable upon receipt. Transfers can be made via decentralised or centralised exchanges, or directly between Ethereum wallets. All transfers are recorded on the Ethereum blockchain.	Free alphanumerical text
E.28	Transfer time schedule	Not applicable	ISO 8601 date format (YYYY-MM-DD)
E.29	Purchaser's technical requirements	To acquire, hold, and transfer ACX tokens, purchasers require: 1. **Ethereum-compatible wallet**: A self-custodial wallet, or hardware wallets that supports ERC-20 tokens. 2. **ETH for gas fees**: A sufficient balance of Ethereum (ETH) to cover network (gas) fees when transacting on the Ethereum mainnet. 3. **Secure key management**: Users must safely store their private keys or recovery phrases. Loss of this information will result in permanent loss	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		of access to ACX tokens. 4. **Stable internet and secure device**: A reliable internet connection and up-to-date device are essential for secure wallet and exchange access. 5. **Exchange account (if applicable)**: If using a centralised exchange, a verified account may be required. KYC/AML procedures will typically apply for fiat on-ramps and withdrawals.	
E.30	Crypto-asset service provider (CASP) name	Revolut Digital Assets Europe Ltd	Free alphanumerical text
E.31	CASP identifier	549300ET4IUR6RCZOL84	{LEI}
E.32	Placement form	NTAV	'WITH- with a firm commitment basis 'WOUT' - without a firm commitment basis 'NTAV' - Not applicable
E.33	Trading platforms name	Revolut Digital Assets Europe Ltd	Free alphanumerical text
E.34	Trading platforms Market identifier code (MIC)	Not applicable	{MIC}
E.35	Trading platforms access	**Centralised Exchanges (CEXs)** 1. Account Creation	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Create an account on an exchange. 2. Identity Verification (KYC) Submit valid identification (passport or national ID) and complete biometric verification if required. This step is mandatory for fiat services and unrestricted trading. 3. Fund Deposit Access the “Wallet” tab and select “Deposit”. Choose from supported cryptocurrencies or fiat (depending on availability in your region). 4. ACX Token Purchase Navigate to the “Trade” interface and search for the ACX/USDT trading pair. Execute the transaction using a market or limit order and confirm the trade. **Decentralised Exchanges (DEXs)** 1. Wallet Setup Install an Ethereum-compatible self-custodial wallet. Configure it to operate on the Ethereum mainnet. 2. Fund the Wallet Deposit ETH or USDC into your wallet. These can be acquired from a CEX and withdrawn to your Ethereum wallet address. 3. Connect the Wallet Visit the official exchange interface , connect your wallet, and ensure you're on the Ethereum mainnet. 4. Locate the ACX Token Search for ACX or paste the verified ACX contract address from Across	

<table>
<thead>
<tr><th>No</th><th>FIELD</th><th>CONTENT TO BE REPORTED</th><th>FORM AND STANDARDS TO BE USED FOR REPORTING</th></tr>
</thead>
<tbody>
<tr><td></td><td></td><td>Protocol’s official documentation. Avoid interacting with copycat tokens.
5. Execute the Swap
Input the amount of ETH or USDC to swap for ACX. Confirm the trade and approve the transaction in your wallet.
6. Transaction Confirmation
Pay the required Ethereum gas fee and finalise the transaction. ACX tokens will appear in your wallet upon confirmation and are viewable on Etherscan.</td><td></td></tr>
<tr><td>E.36</td><td>Involved costs</td><td><table>
<thead><tr><th>Platform Type</th><th>Fee Type</th><th>Cost Estimate</th></tr></thead>
<tbody>
<tr><td>Centralised Exchange (CEX)</td><td>Trading Fee</td><td>0.1%–0.4% per trade</td></tr>
<tr><td></td><td>Withdrawal Fee</td><td>Exchange dependent</td></tr>
<tr><td>Decentralised Exchange (DEX)</td><td>Swap Fee</td><td>0.30% on Uniswap</td></tr>
<tr><td></td><td>Gas Fee</td><td>Variable, typically around $1-20).</td></tr>
</tbody>
</table></td><td>Free alphanumerical text</td></tr>
<tr><td>E.37</td><td>Offer expenses</td><td>ACX has not publicised formal offer expenses, as there was no structured offering or public sale.</td><td>Free alphanumerical text and Amount in monetary value {DECIMAL-18/3}</td></tr>
<tr><td>E.38</td><td>Conflicts of interest</td><td>No known conflicts of interest.</td><td>Free alphanumerical text</td></tr>
<tr><td>E.39</td><td>Applicable law</td><td>Ontario, Canada</td><td>Drop-down list of applicable laws</td></tr>
<tr><td>E.40</td><td>Competent court</td><td>Competent courts of Ontario, Canada</td><td>Free alphanumerical text</td></tr>
</tbody>
</table>

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
Part F - Information about the crypto-assets			
F.1	Crypto-asset type	Utility token	Free alphanumerical text
F.2	Crypto-asset functionality	See D.8	Free alphanumerical text
F.3	Planned application of functionalities	See D.8. Timelines subject to change and development times.	Free alphanumerical text
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	OTHR
F.5	The type of submission	NEWT	NEWT = New MODI = Modify EROR = Error CORR = Correction
F.6	Crypto-asset characteristics	Ethereum Mainnet As of 2025-04-07, ACX has a circulating supply of approximately 407,706,120 ACX tokens, resulting in a market capitalisation of approximately $147,300,000 USD. The total supply of ACX is fixed at 1,000,000,000 tokens. The token was launched without a formal public sale. Initial distribution occurred via an airdrop to early protocol users, liquidity providers, and community participants, as well as through strategic token swaps and	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		treasury-managed allocations. Liquidity was not burnt. Instead, ACX follows a structured allocation framework with defined vesting schedules for strategic partners, the community, and contributors. Token supply and distribution are governed transparently through on-chain mechanisms managed by the Across DAO.	
F.7	Commercial name or trading name	See DTI in F.13	Free alphanumerical text
F.8	Website of the issuer	https://across.to/	Free alphanumerical text
F.9	Starting date of offer to the public or admission to trading	2022-11-28	YYYY-MM-DD
F.10	Publication date	2025-[XX]-[XX]	YYYY-MM-DD
F.11	Any other services provided by the issuer	None	Free alphanumerical text
F.12	Language or languages of the crypto-asset white paper	English	Closed list of EU languages
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	Not available	ISO 24165 Digital Token Identifier

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
F.14	Functionally fungible group digital token identifier, where available	Not available	ISO 24165 FFG DTI
F.15	Voluntary data flag	false	‘true’ – voluntary ‘false’ – mandatory
F.16	Personal data flag	false	‘true’ – Yes ‘false’ – No
F.17	LEI eligibility	false	‘true’ – eligible ‘false’ – not eligible
F.18	Home Member State	Republic of Cyprus	Closed list of EU Member States
F.19	Host Member States	Austria, Belgium, Bulgaria, Croatia, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden.	Closed list of EU Member States
Part G - Information on the rights and obligations attached to the crypto-assets			
G.1	Purchaser rights and obligations	Purchasers of the ACX token do not acquire any governance rights or enforceable obligations.	Free alphanumerical text
G.2	Exercise of rights and obligations	Not applicable	Free alphanumerical text
G.3	Conditions for modifications of rights and obligations	As a decentralised protocol governed by token-holder proposals through the Across DAO, any modifications to the rights, functionality, or governance utility of ACX are	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		subject to community-led governance mechanisms and on-chain voting.	
G.4	Future public offers	Not applicable	Free alphanumerical text
G.5	Issuer retained crypto-assets	Not applicable	Numerical {INTEGER-n}
G.6	Utility token classification	True	‘true’ – Yes ‘false’ – No
G.7	Key features of goods/services of utility tokens	See D.7	Free alphanumerical text
G.8	Utility tokens redemption	Not applicable	Free alphanumerical text
G.9	Non-trading request	false	‘true’ – sought ‘false’ – not sought
G.10	Crypto-assets purchase or sale modalities	ACX tokens can be purchased and sold via both centralised exchanges (CEXs) and decentralised exchanges (DEXs). Common trading pairs include ACX/USDT, ACX/ETH, and ACX/USDC. ACX is an ERC-20 token deployed on Ethereum and operates within a permissionless environment. Its liquidity is primarily concentrated on Ethereum-compatible DEXs, enabling peer-to-peer swaps and decentralised finance (DeFi) integrations. Listings on CEXs enhance accessibility through standard order book functionality and fiat on-ramp options.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
G.11	Crypto-assets transfer restrictions	There are no restrictions imposed at the smart contract level. ACX is fully transferable on the Ethereum blockchain and can be moved freely between ERC-20-compatible wallets. However, centralised exchange platforms may apply restrictions in accordance with local regulations, AML/KYC requirements, or international sanctions. Transfers to and from prohibited jurisdictions may be blocked. On DEXs, users remain individually responsible for legal compliance when conducting peer-to-peer transfers.	Free alphanumerical text
G.12	Supply adjustment protocols	false	‘true’ – Yes ‘false’ – No
G.13	Supply adjustment mechanisms	Not applicable	Free alphanumerical text
G.14	Token value protection schemes	false	‘true’ – Yes ‘false’ – No
G.15	Token value protection schemes description	Not applicable	Free alphanumerical text
G.16	Compensation schemes	False	‘true’ – Yes ‘false’ – No
G.17	Compensation schemes description	Not applicable	Free alphanumerical text
G.18	Applicable law	Ontario, Canada	Drop-down list of applicable laws
G.19	Competent court	Competent courts of Ontario, Canada	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
Part H – information on the underlying technology			
H.1	Distributed ledger technology (DTL)	Distributed Ledger Technology (DLT) refers to a decentralised digital infrastructure for recording transactions across multiple locations simultaneously. Unlike traditional, centralised databases, DLT systems operate without a central authority, relying instead on a network of independent nodes that each maintain a synchronised copy of the ledger. Transactions are confirmed through consensus mechanisms, which promote transparency, security, and resistance to tampering. One of the most prominent forms of DLT is the blockchain, a ledger structure built from sequentially linked blocks containing timestamped transaction data. Each block is cryptographically connected to the previous one, making it virtually immutable and highly resistant to retroactive alteration. Blockchains can also support smart contracts, which are self-executing code structures used to automate and enforce rules or agreements without intermediaries. This streamlines processes and adds an additional layer of trust to decentralised systems. In the broader digital economy, blockchain-based DLT offers enhanced transparency, consumer choice, and interoperability. Users can inspect open-source blockchain code, independently verify data integrity, and choose platforms that align with their personal or technical preferences. The permissionless nature of most public blockchains also promotes seamless integration and innovation across	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		applications, wallets, and services. ACX uses DLT on the Ethereum blockchain.	
H.2	Protocols and technical standards	Primary Network: Ethereum Mainnet DLT Type: Blockchain Consensus Mechanism: Proof of Stake (PoS) Token Standard: ERC-20	Free alphanumerical text
H.3	Technology used	As stated above, ACX is deployed on the Ethereum blockchain and conforms to the ERC-20 token standard. Ethereum supports the execution of smart contracts and the development of decentralised applications (dApps), making it a highly compatible and secure network for utility tokens such as ACX.	Free alphanumerical text
H.4	Consensus mechanism	ACX operates on the Ethereum Mainnet, which uses a Proof-of-Stake (PoS) consensus mechanism. Under PoS, validators stake ETH to propose and attest to new blocks. This system provides strong decentralisation and finality guarantees while significantly reducing the energy consumption previously associated with Proof-of-Work. Ethereum's PoS network enables ACX to benefit from: ● Secure and tamper-resistant transactions ● Smart contract operability ● Interoperability with other ERC-20 protocols ● Reduced environmental impact compared to legacy consensus models	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
H.5	Incentive mechanisms and applicable fees	The ACX token may be used for: ● Participating in Across DAO governance ● Staking to support bridge relayer incentives ● Receiving community or ecosystem-based rewards The token contract does not impose automatic burns, transfer taxes, or redistribution mechanisms. Incentives are handled at the protocol or DAO level. External fees include: ● Gas fees: Ethereum transaction fees paid in ETH, typically ranging from \$1–\$20 depending on network congestion ● Exchange fees: Trading and withdrawal fees on centralised or decentralised exchanges, as determined by the platform used	Free alphanumerical text
H.6	Use of distributed ledger technology	false	‘true’ – Yes, DLT operated by the issuer or a third-party acting on the issuer’s behalf ‘false’ – No, DLT not operated by the issuer or a third-party acting on the issuer’s behalf
H.7	DLT functionality description	ACX is an ERC-20 token issued on the Ethereum blockchain, a public and permissionless Layer 1 network. Ethereum supports secure, transparent, and immutable token transactions across a distributed	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		validator set. ACX tokens are: ● Fully interoperable with Ethereum-based DeFi platforms and wallets ● Tradable on DEXs and aggregators ● Viewable on blockchain explorers for full transparency Smart contracts governing ACX's issuance, governance, and usage are deployed on-chain and subject to community governance via the Across DAO.	
H.8	Audit	True	'true' – Yes 'false' – No
H.9	Audit outcome	ACX token underwent an audit by OpenZeppelin, focusing on its ERC-20 contract, which includes mint and burn functions. The audit confirmed the use of a Safe multi-signature wallet for security. However, concerns were raised about the potential for burning tokens from any wallet. To address this, Across Protocol proposed a supply cap and transferring contract ownership to a null address, a proposal that was overwhelmingly supported by the community.	Free alphanumerical text
Part I – Information on risks			
I.1	Offer-related risks	Offer-related risks for ACX arise from the absence of a formal public token sale. ACX was initially distributed through mechanisms such as liquidity mining, DAO incentives, and	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		community participation rather than a traditional public offering. No prospectus was issued, and there were no minimum subscription thresholds or investor protections typically associated with regulated financial offerings. As a result, holders may face significant risks relating to: ● Limited pre-launch financial disclosure ● High price volatility ● Market speculation and illiquidity during certain periods These factors may affect a purchaser's ability to acquire or dispose of ACX tokens cost-effectively or in a timely manner. Additionally, the absence of a traditional capital raise introduces uncertainty regarding valuation fairness and long-term funding for the protocol.	
I.2	Issuer-related risks	ACX is governed by the Risk Labs Foundation, a non-profit organisation responsible for the development and stewardship of the Across Protocol. While Risk Labs has public-facing contributors, it is not a licensed or regulated financial entity. ACX token holders do not receive shareholder rights, enforceable obligations, or legal guarantees of continued development or financial disclosures. The decentralised nature of the protocol means decision-making is carried out via DAO governance, which may reduce transparency and create ambiguity regarding accountability. Holders must rely on voluntary	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		disclosures, community forums, and on-chain governance mechanisms for information regarding project updates and direction.	
I.3	Crypto-assets-related risks	As with all crypto-assets, ACX is subject to inherent market and regulatory risks: ● Significant price volatility due to speculation, external market conditions, or liquidity constraints ● Uncertainty regarding future regulation of cross-chain bridge protocols or DAO-managed governance tokens ● Risk of user confusion or loss due to copycat tokens or scams impersonating the Across brand As an ERC-20 token on Ethereum, ACX also inherits network-related risks: ● Ethereum gas fees can fluctuate widely and may be prohibitive during peak demand ● Smart contract vulnerabilities, either in the ACX token contract or in bridge-related contracts ● Protocol upgrades or forks that may temporarily disrupt usage or compatibility While the smart contracts are open-source and audited, they are immutable once deployed. As such, critical issues may not be readily addressed, affecting the functionality, safety, or accessibility of the token.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
I.4	Project implementation-related risks	As with all crypto-assets, ACX is subject to inherent market and regulatory risks: ● Significant price volatility due to speculation, external market conditions, or liquidity constraints ● Uncertainty regarding future regulation of cross-chain bridge protocols or DAO-managed governance tokens ● Risk of user confusion or loss due to copycat tokens or scams impersonating the Across brand As an ERC-20 token on Ethereum, ACX also inherits network-related risks: ● Ethereum gas fees can fluctuate widely and may be prohibitive during peak demand ● Smart contract vulnerabilities, either in the ACX token contract or in bridge-related contracts ● Protocol upgrades or forks that may temporarily disrupt usage or compatibility While the smart contracts are open-source and audited, they are immutable once deployed. As such, critical issues may not be readily addressed, affecting the functionality, safety, or accessibility of the token.	Free alphanumerical text
I.5	Technology-related risks	ACX depends on the Ethereum network and the smart contract infrastructure of the Across Protocol. Potential technology-related risks include: ● Ethereum congestion or downtime,	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		which may delay or inflate the cost of transactions ● Smart contract vulnerabilities in the ACX contract, bridging mechanisms, or governance infrastructure ● Interoperability issues with wallets, aggregators, or other cross-chain DeFi protocols Given the reliance on Ethereum and potentially other integrated networks, system-wide disruptions or security breaches elsewhere in the DeFi ecosystem could materially affect ACX functionality or user trust.	
I.6	Mitigation measures	Although ACX does not implement a formal risk management framework, the protocol includes certain features that reduce risk exposure: ● **Deployment on Ethereum**, a widely adopted and well-audited Layer 1 network ● **DAO governance**, enabling decentralised and transparent decision-making ● **Audited smart contracts**, published openly for public scrutiny ● **Wide token availability** via reputable centralised and decentralised exchanges Despite these factors, token holders are strongly encouraged to perform their own due diligence, exercise caution when interacting with third-party applications, and remain alert to evolving regulatory, market,	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		and technical risks affecting the ACX token and broader Across Protocol ecosystem.	
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	ACX is issued on the Ethereum blockchain, which since September 2022 has operated under a Proof-of-Stake (PoS) consensus mechanism following the Ethereum Merge. This transition from Proof-of-Work (PoW) to PoS significantly reduced Ethereum's energy consumption—by an estimated 99.95%—by eliminating the need for energy-intensive mining operations. Nevertheless, Ethereum's PoS model still relies on validator infrastructure that consumes electricity to maintain uptime, secure the network, and process transactions. While this energy usage is modest in comparison to PoW blockchains such as Bitcoin, it still contributes to the protocol's overall environmental footprint. As of the date of this document, no formal environmental mitigation strategies (such as carbon offsetting, sustainability pledges, or third-party climate audits) have been publicly disclosed by Risk Labs Foundation or the Across Protocol DAO in connection with the ACX token. That said, the decision to build and issue ACX on Ethereum—post-Merge—means the token benefits from Ethereum's materially reduced environmental impact compared to legacy blockchain systems. The use of open-source, non-custodial, and decentralised infrastructure also supports transparent and energy-conscious	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		design principles typical of modern Layer 1 PoS networks.	