

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

ALEO (ALEO) 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	SUMMARY Part A - Information about the offeror or the person seeking admission to trading A.1 Name A.2 Legal Form A.3 Registered address A.4 Head office A.5 Registration date A.6 Legal entity identifier A.7 Another identifier required pursuant to applicable national law A.8 Contact telephone number A.9 E-mail address A.10 Response time (Days) A.11 Parent company A.12 Members of the management body A.13 Business Activity A.14 Parent company business activity A.15 Newly established A.16 Financial condition for the past three years A.17 Financial condition since registration Part B - Information about the issuer, if different from the offeror or person seeking admission to trading	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 D.6 Utility Token Classification	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		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 method 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 E.24 Payment methods for crypto-asset	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		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 several crypto assets to which the white paper	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		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) H.2 Protocols and technical standards	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		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

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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			

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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 ALEO (“ALEO”) token is a utility token as defined by Article 3(1)(9) of Regulation (EU) 2023/1114 of the European Parliament and Council of 31 May 2023 on markets in crypto-assets (“MiCA”). The network’s native token, ALEO, is used to pay transaction fees, secure the network through validator incentives, support ecosystem growth, participate in network management and decision-making through voting.	Free alphanumerical text
09		Not applicable.	Free alphanumerical text

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10	Key information about the offer to the public or admission to trading	https://coinmarketcap.com/currencies/aleo/ Aleo is the first platform to offer fully private applications, achieving this through decentralised systems and zero-knowledge cryptography to protect user data on the network. The initial supply at launch will be 1.5 billion ALEO tokens. The total circulating supply of ALEO tokens will grow to 2.6 billion over 10 years, and doubles in about 21 years, as rewards are issued. There are allocated as follows: • Early backers: 34% • Grants and Education: 25% • Employees and Project Contributors: 17% • ALEO network Foundation and Provable: 16% • Strategic partners: 8%. ALEO token in admitting to trading since September 18, 2024, on several centralised exchanges. Upon launching Aleo main network, ALEO token price was \$2.86. The valuation of ALEO at launch was \$7,436,000,000.	Free alphanumerical text
<i>Part A - Information about the offeror or the person seeking admission to trading</i>			
A.1	Name	ALEO Network Foundation	Free alphanumerical text
A.2	Legal form	Legal entity	ISO standard 20275 'Financial Services – Entity Legal Forms (ELF)'

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
A.3	Registered address	Not publicly available information	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 publicly available information	ISO 8601 date format (YYYY-MM-DD)
A.6	Legal entity identifier	Not publicly available information	{LEI}
A.7	Another identifier required pursuant to applicable national law	Not publicly available information	Free text
A.8	Contact telephone number	Not publicly available information	Free alphanumerical text
A.9	E-mail address	hello@aleo.org	Free alphanumerical text
A.10	Response time (Days)	Not publicly available information	{DURATION}
A.11	Parent company	Not publicly available information	Free alphanumerical text
A.12	Members of the management body	Alex Pruden, Executive Director Leena Im, Chief Operating Officer No other member of the management body has been made public	Free alphanumerical text presented in a tabular format

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
A.13	Business activity	Aleo Network Foundation develops and maintains a privacy-focused Layer 1 blockchain platform that enables developers to build decentralised applications with zero-knowledge proof technology. The network's native token, ALEO, is used to pay transaction fees, secure the network through validator incentives, and support ecosystem growth. Aleo's mission is to drive widespread adoption of privacy-preserving technologies in the blockchain space by providing scalable, confidential, and programmable infrastructure.	Free alphanumerical text
A.14	Parent company business activity	Not publicly available information	Free alphanumerical text
A.15	Newly established	false	'true' – Yes 'false' – No

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A.16	Financial condition for the past three years	Not publicly available information Where the offeror or person seeking admission to trading has been established for the past three years, the financial condition of the offeror or person seeking admission to trading over the past three years. This shall be assessed based on a fair review of the development and performance of the business of the offeror or person seeking admission to trading and of its position for each year and interim period for which historical financial information is required, including the causes of material changes. The review shall be a balanced and comprehensive analysis of the development and performance of the business of the offeror or person seeking admission to trading and of its position, consistent with the size and complexity of the business.	Free alphanumeric text
A.17	Financial condition since registration	Not publicly available information Where the offeror or person seeking admission to trading has not been established for the past three years, description of its financial condition since the date of its registration. This shall be assessed based on a fair review of the development and performance of the business of the offeror or person seeking admission to trading and of its position for each year and interim period for which historical financial information is available, including the causes of material changes. The review shall be a balanced and comprehensive analysis of the development	Free alphanumeric text

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		and performance of the business of the offeror or person seeking admission to trading and of its position, consistent with the size and complexity of the business.	
<i>Part B - Information about the issuer, if different from the offeror or person seeking admission to trading</i>			
Not applicable			
<i>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</i>			
C.1	Name	Revolut Digital Assets Europe Ltd	Free alphanumeric 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 alphanumeric 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 alphanumeric text
C.5	Registration date	2022-08-09	ISO 8601 date format (YYYY-MM-DD)

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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
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	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		• exchange of crypto-assets for crypto-assets • operation of a Trading Platform • custody and administration of crypto-assets • transfer of crypto-assets	
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
<i>Part D- Information about the crypto-asset project</i>			
D.1	Crypto-asset project name	ALEO	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	The ALEO token is the native utility token of the Aleo blockchain, a Layer 1 decentralised platform focused on privacy and scalability through zero-knowledge proof cryptography. Aleo enables the development and execution of confidential decentralised applications by ensuring user data privacy and secure	Free alphanumerical text

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		computation. Developers can use these zero-knowledge proof cryptography to build privacy-preserving applications on the Aleo blockchain. This digital ledger is run and maintained through the work of three groups of participants within the Aleo Network, who each earn ALEO tokens rewards for their contributions: • Stakers, who lock up ALEO tokens to help validators participate in consensus on the Network. • Provers, who use specialised hardware to generate proofs and solve puzzles that help secure the Network. • Validators, who run nodes, validate transactions, and participate in consensus on the Network. ALEO tokens function primarily as a means of payment for network transaction fees and computational resources. They also serve as incentives for network participants who validate and secure the blockchain, promoting network integrity and operational stability. The token is designed to support the sustainable growth of the Aleo ecosystem, including funding for developer grants, ecosystem partnerships, and community governance initiatives. ALEO tokens do not represent equity or shares in any legal entity and are not intended as investment instruments.	
D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project	Alex Pruden Leena Im	Free alphanumerical text presented in a tabular format

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		ALEO Network Foundation Aleo Systems Howard Wu Michael Beller Collin Chin Raymond Chu	
D.6	Utility Token Classification	true	'true' – Yes 'false' – No
D.7	Key Features of Goods/Services for Utility Token Projects	Key features of the ALEO token include: ● Governance After main network launch, ALEO token holders may participate in decentralised governance, voting on upgrades and changes to the protocol. ○ Request for Comments (ARC) The Aleo governance system is a platform for making proposals and decisions about the Aleo blockchain and community. The governance platform enables users to submit Aleo ARC which are protocol-level, network-level, and application-level standards for the Aleo ecosystem. After launch, the Aleo Request for Comments process has been reinstated to lead the creation of a democratic, transparent, and efficient way to initiate future changes to the protocol. ALEO tokens holders will be able to participate in governance by voting on potential updates and changes to the protocol. ○ Ambassador program	Free alphanumerical text

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		After the main network launch, ALEO created the ambassador program, which is divided into three levels: Apprentice, Voyager, and Maestro, with participants required to submit content to accumulate AleoPoints and promote community governance. • Staking ALEO tokens can be staked by any individual or organisation that wishes to participate in the incentivisation process of locking up the tokens for a desired amount of time to support the security of the ALEO Network. Stakers delegate tokens to validators, which contributes to their respective stake weight to participate in consensus. As a result, stakers earn a proportionate amount of inflationary rewards provided to the validator they stake with. The minimum requirement for staking is 10,000 ALEO tokens. However, for participants with fewer than 10,000 ALEO tokens, liquid staking is available to earn the same rate of rewards. Staking rewards are determined by the variable amount of ALEO tokens staked globally and the inflation rate of provided network rewards. Estimates have ranged as high as 15 or 20% initially, but will naturally decrease over time as more ALEO tokens are staked and inflationary rewards reduce. • Community Engagement ○ ZPrize Competition: Launched, with others sponsors, the ZPrize Competition encouraging innovations in zero-knowledge technology.	

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		○ zkML Initiative: Aleo introduced its Zero-Knowledge Machine Learning (zkML) program, merging machine learning with zero-knowledge cryptography. ○ Enigma Event Series: Series of events and workshops designed to bring together the brightest minds in ZK technology. ● Granting access ALEO tokens are used to access blockspace and computational resources on the network, with users paying tokens to submit transactions and have them processed. ● Rewards The Aleo Network issues ALEO tokens as rewards to provers for solving puzzles, and validators for securing the network and participating in consensus. Provers are responsible for generating zero-knowledge proofs that validate the correctness of a transaction or computation. In the context of Aleo, these proofs are used to ensure that transactions are valid while keeping the transaction data completely private. By solving computational puzzles, provers are rewarded with ALEO tokens thus incentivising the development of efficient hardware for proof generation. Provers are compensated with ALEO tokens for each valid proof they generate and submit.. Provers provide 1/3 of the solution reward to validators to incentivise their inclusion and reward receipt. Validators also earn a constant block reward (currently set at 23 Tokens per	

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		block) in perpetuity as an incentive to keep validating.	
D.8	Plans for the token	The official roadmap does not include any projects specifically related to the token itself. It focuses primarily on the technical aspects of the ALEO project, including: Technical upgrade Aleo Network plan to undertake several key upgrades that will improve the security, stability and speed of Aleo Byzantine Fault Tolerance, allowing developers to build faster apps on a highly reliable network. Users experience By improving aspects of Aleo virtual machine, developers will soon have access to a smoother, more familiar development experience and users will be able to interact with Aleo decentralised applications in a more seamless manner. This includes improving interoperability and creating a separation between the fee and the user to create a more frictionless payment experience. Enhancing Leo with powerful tooling Several tooling and functionality improvements are being introduced that will make it easier for developers to test their applications more robustly. Leo's core libraries are also being extended for more flexibility and to support more use cases. Scaling the prover ecosystem As the network grows with more users building and interacting on Aleo, the network of provers	Free alphanumerical text

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		needs to grow as well. By increasing the number of provers and creating a prover marketplace, Aleo Network will be able to incentivise fast, affordable proving.	
D.9	Resource allocation	First admission to trading initially made 2024-09-18 with total circulating supply 411,202,431 as of June 2025. The ALEO token is designed to support the growth and development of the Aleo Network. The allocation of funds is governed by a combination of network requirements and community governance. 16% of the total supply will be allocated to the Aleo network Foundation and Provable. The remaining funds will be allocated to Early backers (34%), Grants and Education (25%), Employees and Project Contributors (17%), and Strategic partners (8%). The primary use of the Network Foundation and Provable funds: ● Governance: Governance is a central component of the Aleo ecosystem. ALEO token holders can participate in decentralised governance through the Aleo Request for Comments process. Additionally, the Ambassador Program incentivises community engagement and content creation, reinforcing a participatory model where users earn influence and visibility. ● Reward: The Aleo network distributes ALEO tokens to	Free alphanumerical text

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		incentivise key contributors who ensure privacy and security. • Staking: A portion of the ALEO token supply is allocated to staking incentives. Token holders can stake ALEO to support the network's security by delegating tokens to validators, contributing to consensus.	
D.10	Planned use of collected funds or crypto-assets	The Aleo network has detailed the allocation of its ALEO token's total supply of 1.5 billion tokens as follows: • Early backers: 34% • Grants and Education: 25% • Employees and Project Contributors: 17% • Aleo network Foundation and Provable: 16% • Strategic partners: 8%.	Free alphanumerical text
<i>Part E - Information about the offer to the public of crypto-assets or their admission to trading</i>			
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	Aleo Network introduced the ALEO token to enhance the functionality and growth of its blockchain ecosystem. The primary objectives for offering the ALEO token include: 1. Enhancing Token Liquidity and Market Access Listing on major exchanges increases the	Free alphanumerical text

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		token's liquidity, making it easier for users to buy, sell, and trade ALEO tokens. 2. Supporting Network Security and Staking Participation Wider token distribution through exchange listings encourages more participants to engage in staking, which is vital for the security and decentralisation of the Aleo network. 3. Facilitating Decentralised Governance Public trading of ALEO tokens enables holders to participate in decentralised governance processes, such as voting on protocol upgrades and changes, thereby promoting community-driven development. 4. Promoting Ecosystem Growth and Adoption Exposure on various exchanges can drive interest from developers and users, leading to increased adoption of ALEO's privacy-focused applications and services.	
E.3	Fundraising target	0	Amount in monetary value {DECIMAL-18/3} Or Numerical {INTEGER-n}
E.4	Minimum subscription goals	0	Amount in monetary value {DECIMAL-18/3} or Numerical {INTEGER-n}
E.5	Maximum subscription goals	0	Amount in monetary value {DECIMAL-18/3} or Numerical {INTEGER-n}

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E.6	Oversubscription acceptance	false	'true' - Yes 'false' – No
E.7	Oversubscription allocation	Not applicable	Free alphanumerical text
E.8	Issue price	2.86	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	{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	Price determined by supply and demand.	Free alphanumerical text
E.12	Total number of offered/traded crypto-assets	1,500,000,000	Numerical {INTEGER-n}
E.13	Targeted holders	ALL	'RETL' – retail investors 'PROF' – professional investors 'ALL' – all types of investors
E.14	Holder restrictions	Institutional buyers and individual purchasers may be required to comply with applicable law and regulations, such as KYC/AML, depend on jurisdiction and platform used for transactions. ALEO token holders must (a) are at least 18 years old and legally capable of entering into a binding contract with the Issuer; (b) are not subject to any sanctions, listed as a prohibited	Free alphanumerical text

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		or restricted party, nor a citizen or resident of any country or territory subject to comprehensive sanctions or legal restrictions; and (c) are not otherwise prohibited from participating under applicable laws.oin	
E.15	Reimbursement notice	Not applicable	Predefined alphanumerical text
E.16	Refund mechanism	There is no publicly available information of the refund mechanism.	Free alphanumerical text
E.17	Refund timeline	There is no publicly available information on the refund timeline.	Free alphanumerical text
E.18	Offer phases	Not applicable	Free alphanumerical text
E.19	Early purchase discount	Not applicable	Free alphanumerical text
E.20	Time-limited offer	false	'true'- Yes 'false' – No
E.21	Subscription period beginning	Not applicable	ISO 8601 date format (YYYY-MM-DD)
E.22	Subscription period end	Not applicable	ISO 8601 date format (YYYY-MM-DD)
E.23	Safeguarding arrangements for offered funds/crypto- Assets	No publicly available information	Free alphanumerical text
E.24	Payment methods for crypto-asset purchase	There is no publicly available information regarding the payment methods. However, ALEO tokens can be purchased through various centralised exchange (CEX) platforms that support fiat-to-crypto on-ramping. Depending on the exchange and	Free alphanumerical text

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		regional availability, the following payment methods are supported: • Credit/Debit Cards: Major providers are accepted across most platforms. • Bank Transfers: SEPA, SWIFT, ACH, PIX, PayID, SPEI, and local wire transfer options are available through several platforms often via integrated third-party payment gateways. • E-Wallets: third-party payment services can provide fast, seamless options for purchasing ALEO tokens. • Peer-to-Peer (P2P) Trading: Supported on certain platforms, allowing users to buy ALEO tokens directly from other users using local payment methods, with escrow protection to ensure transaction security.	
E.25	Value transfer methods for reimbursement	Not applicable	Free alphanumerical text
E.26	Right of withdrawal	There is no publicly available information indicating a right of withdrawal for ALEO tokens.	Free alphanumerical text
E.27	Transfer of purchased crypto-assets	The process for transferring ALEO tokens from a centralised exchange or a personal wallet follows these general steps: 1. Access Wallet or Exchange Account Centralised exchange: Log in to your account. Personal wallet: Open your non-custodial ALEO-compatible wallet that holds your ALEO tokens.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		2. Navigate to the ‘Withdraw’ or ‘Send’ Section On exchanges, go to the “Withdraw” or “Assets” page. On wallets, select the ALEO token and choose “Send” or equivalent action. 3. Enter the Recipient’s Wallet Address Paste the correct recipient address associated with an ALEO-compatible wallet. 4. Specify the Amount Input the number of ALEO tokens you wish to transfer. Be aware of any minimum withdrawal limits that may apply on the exchange or wallet. 5. Select the Network <i>(if applicable)</i> ALEO tokens are native to the Aleo main network. Ensure you select this network; ALEO is not available on Ethereum, BNB Chain, or others. There is no cross-chain option currently supported. 6. Review and Confirm the Transfer Carefully verify the address, the selected network, and the amount. Some platforms may require two-factor authentication (2FA) or a withdrawal password. 7. Pay the Network Fee All ALEO transfers require a network fee paid in ALEO, used to process the zero-knowledge proof and execute the transaction on-chain.	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		8. Wait for Confirmation Transactions are validated on the Aleo blockchain using zkSNARKs.	
E.28	Transfer time schedule	Not applicable	ISO 8601 date format (YYYY-MM-DD)
E.29	Purchaser's technical requirements	To participate in the acquisition and management of ALEO tokens, purchasers must meet the following technical requirements: 1. Digital Wallet Compatibility Purchasers must have access to a compatible digital wallet that supports the ALEO token standard. The wallet should enable secure storage, sending, and receiving of ALEO tokens, as well as interaction with Aleo's platform services. 2. Network Connectivity A stable internet connection is required to access Aleo's blockchain network, interact with decentralised applications, and participate in staking or governance activities. 3. Access to Supported Exchanges Purchasers may need accounts on supported centralised where ALEO tokens are listed to facilitate trading or liquidity provision. Some exchanges may require KYC/AML verification to deposit or trade tokens. 4. Security Practice Users must follow best security practices, including safeguarding private keys, enabling two-factor authentication on exchange	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING			
		accounts, and avoiding phishing or scam attempts. 5. Compliance with Software and Hardware Requirements For those participating in advanced activities like proof generation or node validation, access to suitable hardware and software environments is necessary.				
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	1. Create an account (KYC optional for most features) 2. Deposit USDT or use crypto on-ramp 3. Search for ALEO/USDT under Spot Trading 4. Execute your order	Free alphanumerical text			
E.36	Involved costs	<table><thead><tr><th>Platform Type</th><th>Fee Type</th><th>Cost Estimate</th></tr></thead></table>	Platform Type	Fee Type	Cost Estimate	Free alphanumerical text
Platform Type	Fee Type	Cost Estimate				

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Centralised Exchange (CEX) Trading Fee 0.1%–0.2% per trade Withdrawal Fee ~\$10 or platform-specific Decentralised Exchange (DEX) Swap Fee ~0.3% Gas Fee Variable, depends on blockchains load Fiat On-Ramp Service/Processing Fee 1%–3% depending on provider	
E.37	Offer expenses	Not applicable	Free alphanumerical text and Amount in monetary value {DECIMAL-18/3}
E.38	Conflicts of interest	Allocation of funds has led to concern about the concentration of tokens among early investors (early backers: 34%) and project team and foundation (Employees and Project Contributors: 17% and ALEO network Foundation and Provable: 16%), potentially influencing governance and decision-making process.	Free alphanumerical text
E.39	Applicable law	Not publicly available information	Drop-down list of applicable laws
E.40	Competent court	Not publicly available information	Drop-down list of applicable laws
<i>Part F - Information about the crypto-assets</i>			
F.1	Crypto-asset type	Utility token	Free alphanumerical text
F.2	Crypto-asset functionality	See D.7 and D.8	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
F.3	Planned application of functionalities	See D.8.	Free alphanumerical text
<i>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</i>			
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	Total supply of 1.5 billion ALEO tokens. The total circulating supply of ALEO tokens will grow to 2.6 billion over 10 years, and doubles in about 21 years.	Free alphanumerical text
F.7	Commercial name or trading name	See DTI in F.13	Free alphanumerical text
F.8	Website of the issuer	https://aleo.org/	Free alphanumerical text
F.9	Starting date of offer to the public or admission to trading	2024-09-18	YYYY-MM-DD
F.10	Publication date	2025-[XX]-[XX]	YYYY-MM-DD
F.11	Any other services provided by the issuer	1. Aleo Studio Aleo Studio is a dedicated Integrated Development Environment (IDE) for building zero-knowledge applications using Leo (ALEO domain-specific programming language). It simplifies the development workflow and provides tools such as syntax highlighting, debugging, and package management for ZK	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		decentralised App development. 2. Developer Tooling & SDKs Aleo offers a suite of open-source tools and software development kits (SDKs) to enable third parties to build private and scalable applications using Aleo's zero-knowledge platform and programming language, Leo. 3. Aleo Studios / Ecosystem Support Aleo supports third-party teams via its venture initiatives, including incubation, mentorship, and technical guidance for early-stage projects building on Aleo. 4. Aleo Grants Program The Aleo Grants Program supports developers, researchers, and open-source contributors working on zero-knowledge applications, tooling, or infrastructure that enhance the Aleo ecosystem. Grants are offered in several tracks, such as core infrastructure, developer tools, privacy-preserving applications, and educational content. This initiative fosters innovation and decentralised development by providing financial and technical support.	
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
F.14	Functionally fungible group digital token identifier, where available	Not available	ISO 24165 FFG DTI

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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
<i>Part G - Information on the rights and obligations attached to the crypto-assets</i>			
G.1	Purchaser rights and obligations	ALEO holders have governance rights. After main network launch, ALEO token holders may participate in decentralised governance, voting on upgrades and changes to the protocol. Moreover, Aleo Network have launched an Ambassador program. After the main network launch, Aleo create the ambassador program, which is divided into three levels: Apprentice, Voyager, and Maestro, with participants required to submit content to accumulate ALEO tokens and promote community governance.	Free alphanumeric text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
G.2	Exercise of rights and obligations	The Aleo governance system is a platform for making proposals and decisions about the Aleo blockchain and community. The governance platform enables users to submit ALEO ARC which are protocol-level, network-level, and application-level standards for the Aleo ecosystem. After launch, the Aleo Request for Comments process has been reinstated to lead the creation of a democratic, transparent, and efficient way to initiate future changes to the protocol. ALEO tokens holders will be able to participate in governance by voting on potential updates and changes to the protocol.	Free alphanumerical text
G.3	Conditions for modifications of rights and obligations	In order to modify rights and obligations a request for comment (ARC) must be submitted. The community will discuss and review the proposal. The author of the proposal sets the voting period and options, which can be customised individually based on each proposal's characteristics. A governor or a team member of the Aleo Network Foundation (ANF) will create a formal proposal on Aleo governance and initiate the voting process. The community will vote on the proposal for approval.	Free alphanumerical text
G.4	Future public offers	This information is not publicly available. However, it was provided that the total circulating supply of ALEO Tokens will grow to 2.6 billion over 10 years, and doubles in about 21 years.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
G.5	Issuer retained crypto-assets	Pursuant to the allocation provided by Aleo, 16% of the total supply will be allocated to Aleo network Foundation and Provable.	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	ALEO tokens can be bought and sold through centralised Exchanges platforms that support ALEO trading. As of now, the ALEO token is not listed on any major decentralised exchanges (DEXs). Common trading pairs include ALEO/USDT and ALEO/USD.	Free alphanumerical text
G.11	Crypto-assets transfer restrictions	There are no token-level restrictions on the transferability of ALEO. Once tokens are distributed or earned, holders are free to transfer or trade ALEO tokens peer-to-peer or on secondary markets. However, transfer and trading activities may be subject to platform-level restrictions based on legal, regulatory, or operational requirements. Jurisdictional Restrictions ALEO tokens must not be sold or transferred to individuals or entities located in jurisdictions	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		subject to international sanctions, or where trading or holding digital assets is prohibited under applicable laws. Users are responsible for ensuring compliance with their local legal frameworks. Exchange-Imposed Restrictions When using centralised platforms, transfers of ALEO may be restricted or delayed if the user fails to complete required AML/KYC procedures. Transactions from unverified accounts may be limited, blocked, or reversed to ensure compliance with anti-money laundering and counter-terrorism financing (CTF) regulations.	
G.12	Supply adjustment protocols	true	'true' – Yes 'false' – No
G.13	Supply adjustment mechanisms	All ALEO token claims, by Aleo Foundation employees, associates, incentives program participants and other contributors, no matter their geographical location or country of provenance, will have a 1-year lock-up period where the trading of ALEO tokens will be restricted. Foundation employees will be subject to more restrictive lock-up provisions to ensure fairness. Ambassadors will be subject to the same lock-up period as other incentives program participants. Moreover, tokens staked in the network are locked for the staking period, meaning holders cannot transfer or use them freely while staked.	Free alphanumeric text
G.14	Token value protection schemes	false	'true' – Yes

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
			'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	Not publicly available information	Drop-down list of applicable laws
G.19	Competent court	Not publicly available information	Free alphanumerical text
<i>Part H – information on the underlying technology</i>			
H.1	Distributed ledger technology (DTL)	Distributed Ledger Technology (DLT) refers to a decentralised digital infrastructure used 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, each maintaining a synchronised copy of the ledger. Transactions are validated through consensus mechanisms, promoting transparency, security, and resistance to tampering. One of the most widely adopted forms of DLT is blockchain, which consists of sequentially linked blocks containing timestamped transaction data. Each block is cryptographically connected to the previous one, making it virtually immutable and resistant to retroactive alteration. Blockchains can also support smart contracts, self-executing agreements that automate	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		processes and enforce rules without intermediaries, thereby increasing trust and efficiency in decentralised systems. Blockchain-based DLT enhances transparency, consumer choice, and interoperability within the broader digital economy. Users can inspect open-source blockchain code, independently verify data integrity, and choose platforms that align with their preferences. The permissionless nature of public blockchains promotes seamless integration and innovation across applications, wallets, and services.	
H.2	Protocols and technical standards	The ALEO token is native to the Aleo blockchain, a Layer 1 blockchain protocol purpose-built for private and programmable applications using zero-knowledge cryptography. Blockchain protocol: ALEO (custom Layer 1 chain built on a novel ZK architecture) Consensus mechanism: Aleo's consensus is a hybrid model combining: • Proof-of-Succinct-Work (PoSW) • AleoBFT (PoS + BFT): Validators run a Proof of Stake system with Byzantine Fault Tolerance Smart contract framework: Leo, a domain-specific language (DSL) for writing private smart contracts using ZKPs Transaction model: UTXO-like model with encrypted state changes and zero-knowledge proofs Token standard: Native token (ALEO), not	Free alphanumeric text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		following ERC-20 but integrated directly into Aleo's protocol rules Privacy layer: Zero-knowledge proofs using zk-SNARKs (built on snarkVM) Interoperability: Currently limited; bridges and standards for cross-chain interoperability are under development	
H.3	Technology used	The ALEO token operates on a proprietary Layer 1 blockchain infrastructure purpose-built for private and decentralised applications using zero-knowledge cryptography (zk-SNARKs). ALEO leverages its own native blockchain. The Aleo blockchain infrastructure combines: • snarkOS: A decentralised operating system powering private applications on-chain • snarkVM: A zero-knowledge virtual machine that executes smart contracts off-chain with verifiable encrypted state changes • Leo: A domain-specific language (DSL) tailored for building zero-knowledge smart contracts The ALEO token does not rely on Ethereum or other general-purpose blockchains, but instead harnesses the power of its own dedicated cryptographic architecture for privacy and programmability.	Free alphanumerical text
H.4	Consensus mechanism	Aleo employs a hybrid consensus model combining Proof of Succinct Work (PoSW) and AleoBFT, a PoS-based protocol with Byzantine fault tolerance. PoSW enables	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		decentralised provers to generate zero-knowledge proofs in a competitive, work-based process, ensuring cryptographic integrity. AleoBFT, meanwhile, ensures fast finality and high throughput via a validator network running a DAG-based protocol. This dual-layer approach balances scalability, privacy, and decentralisation.	
H.5	Incentive mechanisms and applicable fees	Staking Rewards: Aleo tokens can be staked by any individual or organisation that wishes to participate in the incentivisation process of locking up the tokens for a desired amount of time to support the security of the Aleo Network. Stakers delegate tokens to validators, which contributes to their respective stake weight to participate in consensus. As a result, stakers earn a proportionate amount of inflationary rewards provided to the validator they stake with. Staking rewards are determined by the variable amount of ALEO tokens staked globally and the inflation rate of provided network rewards. Incentives Programs: The Aleo incentives token distribution allocation recognises participants who have been essential in building the Aleo network and the community that supports it. Applicable Fees: The Aleo network employs a transparent and predictable transaction fee model to ensure fair compensation for network validators and to mitigate network spam. Deployment Base Fees: Applied	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		when deploying smart contracts to the Aleo network. ○ Execution Base Fee: Applies when executing smart contract functions. ○ Priority Fee (planned): An optional fee to accelerate transaction processing during periods of high network congestion. Not yet active.	
H.6	Use of distributed ledger technology	true	'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	The Aleo blockchain is built on a decentralised distributed ledger technology (DLT) that combines privacy, scalability, and security. Leveraging zero-knowledge proofs (zk-SNARKs), Aleo enables confidential transaction processing and private smart contract execution, ensuring that sensitive data remains hidden while still verifiable by the network. The protocol operates on a hybrid consensus model combining Proof of Succinct Work (PoSW) and AleoBFT. Aleo's DLT supports programmable smart contracts developed using the Leo language, designed specifically for zero-knowledge applications. This architecture facilitates a trustless environment where users can interact, transact, and build decentralised applications without compromising privacy or security. Moreover, the network's open, permissionless nature promotes broad participation and	Free alphanumeric text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		innovation across the ecosystem.	
H.8	Audit	true	'true' – Yes 'false' – No
H.9	Audit outcome	Leading up to the main network launch, Aleo engaged three independent security firms (Trail of Bits, NCC Group, and zkSecurity) to conduct comprehensive audits of its core components: snarkOS and snarkVM. These audits, spanning over 18 weeks, focused on critical areas such as consensus mechanisms, inter-node communication, zero-knowledge proof systems, and smart contract execution. The findings from these audits led to the identification and resolution of several issues, enhancing the overall security posture of the network.	Free alphanumerical text
Part I – Information on risks			
I.1	Offer-related risks	The offering and subsequent trading of ALEO tokens carry inherent risks commonly associated with crypto-asset markets, including high volatility, liquidity issues, and regulatory uncertainty. These risks include: Market Volatility The price of ALEO may fluctuate significantly due to market sentiment, promotional activity, influencer engagement, or broader macroeconomic conditions. Such fluctuations can result in partial or total financial loss. Liquidity Risk As ALEO tokens are not listed on all major	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		exchanges, there may be limited liquidity in the short to medium term, making it difficult for token holders to exit their position or realise the token's economic value. Lock-Up Cliff and vesting schedules can delay token availability. Consequently, participants may be unable to liquidate as planned and face opportunity costs. Regulatory Risk The legal and regulatory landscape for crypto-assets is still evolving. Future legislation or regulatory frameworks may restrict access to Aleo or impose new requirements on token holders (e.g., reporting obligations, eligibility criteria, or holding limits). AML/KYC Compliance Participation via centralised exchanges may be subject to anti-money laundering (AML) and know-your-customer (KYC) verification processes. Users in certain jurisdictions may face restrictions, delays, or account limitations if they do not meet verification requirements.	
I.2	Issuer-related risks	No Performance guarantees While the Foundation and its affiliated contributors provide key infrastructure, funding, and strategic direction, they do not offer any performance guarantees or economic assurances regarding the ALEO token. The token's value and utility depend on the proper functioning of a broad, decentralised ecosystem, including validators, developers, and users acting independently of	Free alphanumeric text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		the Foundation. Decentralised Control The Aleo Foundation plays a key role in the development and coordination of the Aleo ecosystem; however, it does not exercise centralised control over the Aleo protocol, which operates in a decentralised and community-driven manner. This structural design carries a number of risks related to the nature and limitations of the issuer's role. Regulatory Exposure Operating across multiple jurisdictions, Aleo Network is exposed to varying legal frameworks, including potential restrictions on exchange operations or token listings. Regulatory developments may require significant operational changes or affect the legal standing of ALEO tokens. Liability In the absence of a traditional issuer bound by enforceable obligations, no entity assumes liability for technical malfunctions, smart contract bugs, governance attacks, or token losses. There is no centralised recourse in the event of project failure, ecosystem fragmentation, or malicious behaviour by participants.	
I.3	Crypto-assets-related risks	Speculative Nature The ALEO token is subject to high market volatility and speculative activity. As with many crypto-assets, its value may be influenced by factors such as investor sentiment, regulatory developments, technological changes, or	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		macroeconomic trends. Regulatory and Legal Uncertainty Crypto-assets are subject to evolving and often uncertain legal and regulatory frameworks across jurisdictions. ALEO tokens, particularly given their use in privacy-preserving applications, may be scrutinised or restricted by regulators, which could negatively impact their accessibility, trading availability, or legality in some countries. Governance and Token Supply Risk ALEO token holders participate in decentralised governance, which introduces risks tied to decision-making by token-weighted voting. Governance proposals could result in controversial protocol changes, inflation adjustments, or reallocation of treasury funds. Tokenomics changes approved via governance may affect token value, user incentives, or long-term sustainability. Risk of Loss or Theft Token holders are responsible for managing their private keys and wallets. Loss of access credentials or compromise of private keys can result in irreversible loss of ALEO tokens. Users may also be vulnerable to scams, phishing, or wallet exploits.	
I.4	Project implementation-related risks	Limited Adoption and Utility Risk The value and utility of ALEO tokens are closely tied to adoption of the Aleo network and its privacy-preserving applications. If the ecosystem fails to attract developers, users, or third-party integrations, the token's demand and functionality may decline. Furthermore, the complexity of zero-knowledge cryptography and the relatively early stage of ALEO's	Free alphanumeric text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		technology may limit mass adoption. Talent and Resource Constraints The success of the project depends on the continued contributions of skilled stakeholders. A loss of key personnel, difficulties in attracting new talent, or constraints in securing long-term funding could impact the quality and timeliness of project delivery. Governance in a Decentralised Context As the Aleo network transitions to decentralised governance, implementation of protocol upgrades or treasury decisions may become slower or more fragmented. Misaligned incentives among token holders, lack of quorum, or contentious votes could delay or block important initiatives, affecting the network's competitiveness.	
I.5	Technology-related risks	Dependency on Novel Cryptographic Technology Aleo is among the first layer-1 blockchains to offer native support for private programmable applications using zero-knowledge proofs (ZKPs). This novel architecture introduces specific risks, including unforeseen vulnerabilities in the cryptographic stack, inefficiencies in proof generation, or difficulties in scaling private smart contracts for real-world usage. Network Security Issues In the context of Aleo's decentralised network, the security of individual nodes becomes crucial in maintaining the integrity of the entire system. Each node acts as a validator, and any security lapse in a single node could have ramifications for the network's overall security.	Free alphanumeric text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		It's essential to implement rigorous security protocols for node operation, including regular security audits and real-time monitoring for anomalies. Furthermore, the network must be resilient enough to withstand and quickly recover from individual node failures, ensuring continuous operation and data integrity. Code Vulnerabilities: The risk of code exploits in Aleo's smart contracts is compounded by the intricate nature of their construction and the potential for human error. Given that smart contracts often handle significant transactions or sensitive information, any vulnerability can have severe consequences. Unanticipated Interactions: The interaction between different smart contracts on Aleo presents another layer of complexity. These interactions can sometimes produce unpredictable outcomes, especially when multiple contracts with varying functions and structures come into play.	
I.6	Mitigation measures	Aleo have implemented several mitigation measures : • Multiple Exchange Listings: Aleo is available on various centralised exchanges, improving liquidity and user access. • Transparent Distribution The token was launched through a fair launch, ensuring a decentralised and transparent entry into the market. • Lock-Up Period: All tokens distributed through incentive	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		programs are subject to a one-year lock-up period. This prevents rapid token liquidation and promotes ecosystem stability. • Decentralised and Transparent Governance Aleo's governance system empowers token holders to participate to protocol upgrades and changes, reducing risks related to unilateral or unexpected modifications. • Security Program: ○ Aleo has implemented a Bug Bounty Program in collaboration with platforms like HackerOne and Bugcrowd, offering rewards to ethical hackers who identify vulnerabilities within the snarkOS and snarkVM codebases. ○ Aleo partnered with Sherlock to launch a competitive audit contest focused on the ARC-41 proposal, which introduced improvements to Aleo's staking and delegation model. Aleo offered a reward pool of \$155,000 to security researchers for identifying vulnerabilities in the updated Aleo program.	
Part J – Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts			

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
J.1	Adverse impacts on climate and other environment- related adverse impacts	AleoBFT, as a Proof of Stake (PoS) consensus mechanism, is far more energy-efficient than Proof of Work, relying on validator staking rather than continuous heavy computation, thus minimising its environmental footprint.	Free alphanumerical text