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

ALEPH CLOUD (ALEPH) 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
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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
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	Predefined alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		management body, the information presented in the crypto-asset white paper is fair, clear and not misleading and the crypto-asset white paper makes no omission likely to affect its import.	
04	Statement in accordance with Article 6(5), points (a), (b), (c), of Regulation (EU) 2023/1114	The crypto-asset referred to in this crypto-asset white paper may lose its value in part or in full, may not always be transferable and may not be liquid.	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 Aleph Cloud ("**ALEPH**") 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**").	Free alphanumerical text
09		Not applicable	Free alphanumerical text
10	Key information about the offer to the public or admission to trading	https://coinmarketcap.com/currencies/aleph-im/ The Token Generation Event (TGE) was on June 20, 2020, with a listing price of approximately $0.0131. ALEPH is listed on certain centralised and decentralised exchanges.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		On July 31st, 2020, 12:00pm GMT+2, the maximum total supply has been reduced from 1 billion ALEPH to 500 million ALEPH. The initial allocation was the following: ● 150M: Innovation Pool ● 150M: Marketing Pool ● 275M: Company Pool ● 275M: Business Developments Pool ● 100M: Incentive Pool. The new distribution is the following: ● 200M: Incentives ● 100M: Business Development ● 100M: Company ● 40M: Marketing ● 50M: Innovation ● 10M: NULS Foundation.	
Part A - Information about the offeror or the person seeking admission to trading			
A.1	Name	Information not publicly available	Free alphanumerical text
A.2	Legal form	Information not publicly available	ISO standard 20275 'Financial Services – Entity Legal Forms (ELF)'
A.3	Registered address	Information not publicly available	ISO standard 3166-1 alpha 2 country codes and codes for their subdivisions and

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
			Free alphanumerical text
A.4	Head office	Information not publicly available	ISO standard 3166-1 alpha 2 country codes and codes for their subdivisions and Free alphanumerical text
A.5	Registration date	Information not publicly available	ISO 8601 date format (YYYY-MM-DD)
A.6	Legal entity identifier	Information not publicly available	{LEI}
A.7	Another identifier required pursuant to applicable national law	Information not publicly available	Free text
A.8	Contact telephone number	Information not publicly available	Free alphanumerical text
A.9	E-mail address	hello@aleph.im	Free alphanumerical text
A.10	Response time (Days)	Information not publicly available	{DURATION}
A.11	Parent company	Information not publicly available	Free alphanumerical text
A.12	Members of the management body	Jonathan Schemoul, CEO and Founder Claudio Pascariello, Co-Founder Hugo Herter, CTO	Free alphanumerical text presented in a tabular format
A.13	Business activity	Information not publicly available	Free alphanumerical text
A.14	Parent company business activity	Information not publicly available	Free alphanumerical text
A.15	Newly established	Information not publicly available	‘true’ – Yes ‘false’ – No

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
A.16	Financial condition for the past three years	Information not publicly available 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 alphanumerical text
A.17	Financial condition since registration	Information not publicly available 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 alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		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.	
Part B - Information about the issuer, if different from the offeror or person seeking admission to trading			
Not applicable			
Part C- Information about the operator of the trading platform in cases where it draws up the crypto-asset white paper and information about other persons drawing the crypto-asset white paper pursuant to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114			
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

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

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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
D.4	Crypto-asset project description	Aleph Cloud is an open-source, off-chain peer-to-peer (P2P) network. It provides decentralised services such as key-value storage, file storage, function execution, and virtual machine provisioning. The network uses decentralised identities that are compatible with several major blockchain networks, including Ethereum, Tezos, and Solana. This setup allows Aleph Cloud to interact with various blockchain networks. Bridges are available so that smart contracts can communicate with Aleph Cloud. Additionally, Aleph Cloud includes a blockchain indexing framework. This lets developers index and access data from any blockchain network by using Aleph Cloud's decentralised storage and computing resources.	Free alphanumerical text
D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project	Jonathan Schemoul, CEO and Founder Claudio Pascariello, Co-Founder Hugo Herter, CTO Florian Le Goff Daniel Bar Ashley Richardson	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	ALEPH is the cornerstone of the Aleph Cloud ecosystem, ensuring a decentralised, secure, and efficient network through the following mechanisms.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		● **Staking** Holders of ALEPH tokens have the option to stake their tokens, which involves locking a portion of their holdings in exchange for rewards. The network continuously monitors the number of tokens in the wallet and calculates returns in real time. This allows users to freely deposit or withdraw funds from their wallet at any moment. Furthermore, rewards earned are automatically added to the staked amount. By staking ALEPH tokens, participants contribute to the growth of the network, enhancing both its security and decentralisation. ● **Payments** Users pay for Aleph Cloud services with ALEPH, i.e. access to decentralised storage and computing services on the Aleph Cloud network. With Pay-as-You-Go, users have the ability to pay for network resources in real time by streaming tokens throughout the period they are using the service. When a token stream is initiated, payments are made continuously for as long as the resource is being accessed. Once the stream is closed, payments immediately stop and access to the resource is revoked. This system ensures that users are only charged for the resources they actually use, providing a highly flexible and efficient payment solution.	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
D.8	Plan for the token	On July 28, 2020, Aleph announced a token supply reduction. On July 31st, 2020, 12:00pm GMT+2, the maximum total supply has changed from 1 billion ALEPH to 500 million ALEPH. The 2025 roadmap includes several key initiatives: ● Rebranding of the company from Aleph.im to Aleph Cloud; ● Development of scalable solutions tailored for enterprise partners; ● Launch of a marketplace for GPUs and virtual agents; and ● Broader access for developers to decentralised computing infrastructure. Additionally, Jonathan Schemoul announced on X that new ALEPH tokenomics are currently being developed.	Free alphanumerical text
D.9	Resource allocation	On July 28, 2020, Aleph announced a token supply reduction. On July 31st, 2020, 12:00pm GMT+2, the maximum total supply has changed from 1 billion ALEPH to 500 million ALEPH. Of those 500 million ALEPH tokens to be reduced, 350 million ALEPH were originally allocated for a token sale that did not occur due to Aleph Cloud’s self-funding. The rest of the 150 million ALEPH removed will be taken from the allocated pools.	Free alphanumerical text The Token Generation Event (TGE) was on April 10, 2025, with a listing price of approximately $0.1844, thus a valuation of $184,400,000.

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		● **Incentives Pool**: 200M This Incentives Pool pays for the node rewards, liquidity pools, and incentivised computing/storage. The main way to setup incentives on the network. It is equivalent of block rewards source on traditional blockchains. ● **Business Development Pool: 100M** Used for business development. These tokens are unlocked and vested as needed in order to facilitate future partnerships, business development, and use cases with companies. These tokens are intended to be used within the Aleph Cloud's ecosystem, not sold on the market immediately upon unlock. ● **Company Pool: 100M** Used by the company to fund operations. Unlocks are fixed at a rate of 2.5M per month. ● **Marketing Pool: 40M** Pool used to fund marketing efforts. Original release schedule is 1M per month max. ● **Innovation Pool: 50M** Pool is intended to fund ecosystem projects, grants for future projects, etc.. ● **NULS Foundation Pool: 10M** Remains of an agreement with the NULS foundation in 2019. Will be managed by a DAO, can't be touched by the company nor NULS directly.	
D.10	Planned use of collected funds or crypto-assets	From publicly available information, the circulation supply did not reach its limit.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		From the total supply at genesis: ● 100M is used for business development. These tokens are unlocked and vested as needed in order to facilitate future partnerships, business development, and use cases with companies. These tokens are intended to be used within the Aleph Cloud's ecosystem, not sold on the market immediately upon unlock. ● 100M is used by the company to fund operations. ● 40M is used to fund marketing efforts. ● Innovation Pool: 50M is used to fund ecosystem projects, grants for future projects, etc..	
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	No official document explicitly sets forth the formal reasons for the admission to trading of the ALEPH token. However, such reasons may be reasonably inferred from ALEPH's developments: ● **Market Liquidity** The ALEPH token serves as both a utility and reward token for node operators, including those managing computing and storage nodes, who supply decentralised infrastructure. ● **Ecosystem Participation** Public trading fosters broader participation and incentivises user involvement through	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		mechanisms like rewards and governance.	
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}
E.6	Oversubscription acceptance	false	'true'- Yes 'false' – No
E.7	Oversubscription allocation	Not applicable	Free alphanumerical text
E.8	Issue price	0.01318	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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
			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	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	Aleph Cloud does not disclose any holder restrictions. However, access may be restricted by exchange platforms or national laws.	Free alphanumerical text
E.15	Reimbursement notice	Not applicable	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	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)

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.23	Safeguarding arrangements for offered funds/crypto- Assets	Not applicable	Free alphanumerical text
E.24	Payment methods for crypto-asset purchase	**1. Centralised Exchanges (CEXs)** ● **Credit/Debit Cards:** Certain platforms may allow users to purchase ALEPH tokens directly with credit or debit cards. ● **Bank Transfers:** Some exchanges support bank transfers, by linking the bank account to the platform, selecting ALEPH and confirming the transaction. ● **Third-Party Payment Services:** Payment providers are sometimes integrated with exchanges to facilitate purchases through various local payment options. ● **Peer-to-Peer (P2P) Trading:** Certain exchanges offer P2P trading, where users can buy ALEPH directly from other holders using local payment methods, including bank transfers and digital wallets. **2. Decentralised Exchanges (DEXs)** ● **Cryptocurrency Swaps:** On certain platforms, users can swap tokens for ALEPH tokens. This requires a compatible crypto wallet and familiarity with gas fees and slippage. **3. Fiat On-Ramp Services** ● **Payment Gateways**: Certain services act as fiat on-ramps, enabling purchases of ALEPH tokens via card payments, bank transfers, and other local payment methods.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.25	Value transfer methods for reimbursement	Not applicable	Free alphanumerical text
E.26	Right of withdrawal	Vary by platform and blockchain	Free alphanumerical text
E.27	Transfer of purchased crypto-assets	**1. Access Wallet or Exchange Account** ● **Centralised exchange:** Log in to your account. ● **Personal wallet:** Open your non-custodial wallet that holds your ALEPH tokens. **2. Navigate to the 'Withdraw' or 'Send' Section** ● On exchanges, go to the "Withdraw" or "Assets" page. ● On personal wallets, select the ALEPH token and then tap or click "Send". **3. Enter the Recipient's Wallet Address** ● Copy and paste the correct wallet address of the recipient. ● Double-check that the wallet supports ALEPH tokens on the correct blockchain. ● Using the wrong chain or incorrect address could result in permanent loss of your tokens. **4. Specify the Amount** ● Input the number of ALEPH tokens you wish to transfer. ● Some platforms may require a minimum	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		transfer amount. **5. Select the Network (if applicable)** ● If your ALEPH tokens are available on multiple networks, make sure you select the correct network that matches the recipient's wallet. **6. Review and Confirm the Transfer** ● Check all details: recipient address, network, and amount. ● On centralised platforms, you may need to complete 2FA verification or enter a withdrawal password. **7. Pay the Network Fee** Blockchain transactions require a network fee (gas fee), paid in the native currency of the chosen network: SOL for Solana, ETH for Ethereum. **8. Wait for Confirmation** The transaction will be processed and broadcast to the blockchain.	
E.28	Transfer time schedule	2020-06-20	ISO 8601 date format (YYYY-MM-DD)
E.29	Purchaser's technical requirements	To participate in the acquisition and management of ALEPH tokens, purchasers must meet the following technical requirements. **1. Wallet requirements** To begin using ALEPH first step is to connect to a wallet. ALEPH tokens are multichain but mainly deployed on Ethereum, Solana, and	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Base. Users can connect wallets that support ERC-20. Before interacting, users should review ALEPH's contractual and protocol documentation and accept any on-chain prompts or terms of use. Once connected, users gain full access to ALEPH functions (rewards, governance) via compatible interfaces. **2. Network Connectivity** A stable internet connection is required to maintain wallet connectivity, submit transactions, and interact with network without interruption. **3. Access to Supported Exchanges** ● Centralised and Decentralised Exchanges ALEPH tokens are listed on several exchanges, including centralised platforms and decentralised exchanges (DEXs) ● Accounts and Verifications To trade or provide liquidity, users typically need accounts on these platforms. Some centralised exchanges require KYC/AML verification for deposits, withdrawals, or trading.	
E.30	Crypto-asset service provider (CASP) name	Revolut Digital Assets Europe Ltd	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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	Investors can access trading platforms where ALEPH's native tokens are listed by creating an account on their respective platform, completing the required identity verification (KYC) processes, if applicable, and funding their accounts with supported cryptocurrencies or fiat currencies. Once registered and funded, investors can search for the ALEPH token trading pairs and place buy or sell orders directly through the platform's interface. Detailed guides and tutorials are generally available on the trading platform to assist investors in navigating and using their services effectively.	Free alphanumerical text
E.36	Involved costs	**Platform Type** | **Fee Type** | **Cost Estimate** **Centralised Exchange (CEX)** | Trading Fee | 0.1%–0.2% per trade	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Withdrawal Fee ~5-10 USD or platform-specific **Decentralised Exchange (DEX)** Swap Fee ~0.3% Gas Fee ~ $2 - $15 depending on network **Fiat On-Ramp** Service/Processing Fee 1.5%–6%	
E.37	Offer expenses	Not applicable	Free alphanumerical text and Amount in monetary value {DECIMAL-18/3}
E.38	Conflicts of interest	There are no known conflicts of interest.	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
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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
F.5	The type of submission	NEWT	NEWT = New MODI = Modify EROR = Error CORR = Correction
F.6	Crypto-asset characteristics	Total supply of 500,000,000 ALEPH tokens	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://aleph.cloud/	Free alphanumerical text
F.9	Starting date of offer to the public or admission to trading	2020-06-20	YYYY-MM-DD
F.10	Publication date	2025-[XX]-[XX]	YYYY-MM-DD
F.11	Any other services provided by the issuer	The issuer does not provide any information regarding other services provided.	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
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
Part G - Information on the rights and obligations attached to the crypto-assets			
G.1	Purchaser rights and obligations	• **Staking Rewards** Staking rewards serve as incentives for token holders who commit their ALEPH tokens to help secure the network and maintain decentralised resource nodes. By staking their tokens, participants enhance the network’s stability and, in exchange, receive rewards in the form of extra ALEPH tokens. • **Core Channel Node (CCN) Rewards** By running Core Channel Nodes (CCN), token holders contribute to the network reliability and security while earning ALEPH as compensation. Core channel nodes will stake	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		and receive rewards, validate the network, control and manage the network, provide database and file storage services. ● **Obligations** The token holder's obligation includes the payment of any network fees and compliance with applicable legal and regulatory requirements.	
G.2	Exercise of rights and obligations	● **Staking Rewards** When staking/delegating, users start receiving rewards from day one. Each staker is rewarded according to the amount staked versus the total amount staked by all stakers. To stake ALEPH, users need to go to the following link: https://account.aleph.im/. The minimum amount required to stake and earn rewards is 10,000 ALEPH. This threshold is set primarily due to concerns about gas fees. Allowing smaller amounts to be staked would significantly increase the number of distribution targets, leading to much higher costs for the project. Staking on Aleph Cloud is completely non-custodial. There is no vesting or lock up period, users can unstake at any time without affecting their principal balance. Staking is gasless. Rewards are typically paid within up to 10 days, depending on the gas costs. Pursuant to publicly available information, staking is only available in Ethereum. ● **Core Channel Node (CCN) Rewards** For a node to become a core channel node, a node operator must stake 200,000	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		tokens and stakers must stake minimum of 500,000 ALEPH tokens. Any node can join the network but until it reaches the minimum of 500,000 ALEPH staked it does not reach the status of core channel node. Until reaching this status, this node has full access to the network and participates in validating, controlling and managing the network but does not receive any reward. The minimum hardware requirement to run a CNN are the following: ○ **RAM**: Minimum 32 GB, recommended 64 GB ○ **CPU**: Recent model with at least 8 cores (16 cores recommended) ○ **Bandwidth**: Minimum 100 MB upload (1 GB ideal) ○ **Storage**: Minimum 4+ Fast TB HDD or SSD (system on SSD recommended) Core channel node operators will initially share a reward pool of 15K ALEPH tokens per day for running these nodes. Node operators are incentivised to run as many nodes as possible. Because for each additional node they run, they get another share of the common node reward pool.	
G.3	Conditions for modifications of rights and obligations	Although this information is not publicly disclosed, in the absence of decentralised governance, decisions are made at the company level. Token holders are allowed to participate in certain decisions through platforms like X and	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Telegram, but there is no DAO in place.	
G.4	Future public offers	Not publicly available information	Free alphanumerical text
G.5	Issuer retained crypto-assets	100,000,000	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	Not applicable	Free alphanumerical text
G.11	Crypto-assets transfer restrictions	Aleph Cloud does not disclose any information regarding ALEPH’s transfer restrictions. However, it can be reasonably inferred that the following restrictions apply: **Exchange-Imposed Restrictions** When using centralised platforms, transfers of ALEPH tokens 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	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		laundering and counter-terrorism financing (CTF) regulations. **Decentralised Transfers** Transfers conducted via DEXs are generally unrestricted at the protocol level. However, users remain solely responsible for ensuring their actions comply with the legal and regulatory requirements of their jurisdiction.	
G.12	Supply adjustment protocols	true	'true' – Yes 'false' – No
G.13	Supply adjustment mechanisms	**Lowering Allocation** On July 28, 2020, Aleph announced a token supply reduction. On July 31st, 2020, 12:00pm GMT+2, the maximum total supply has been reduced from 1 billion ALEPH to 500 million ALEPH. Of those 500 million ALEPH tokens to be reduced, 350 million ALEPH were originally allocated for a token sale that did not occur due to Aleph Cloud's self-funding. The rest of the 150 million ALEPH removed will be taken from the allocated pools. **Vesting** ● **Business Development Pool**: Tokens allocated for the Business Development pool are unlocked and vested as needed in order to facilitate future partnerships, business development, and use cases with companies. ● **Company Pool**: Tokens allocated for the Company Pool are	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		unlocked at a rate of 2.5M per month.	
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	Not publicly available information	Drop-down list of applicable laws
G.19	Competent court	Not publicly available information	Free alphanumerical text
Part H – information on the underlying technology			
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	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		resistant to retroactive alteration. Blockchains can also support smart contracts, self-executing agreements that automate 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 Aleph Cloud network is designed as a decentralised, peer-to-peer system that provides both storage and computing capabilities. Aleph Cloud is compatible with multiple blockchains to leverage their unique strengths and enhance scalability, security, and interoperability. However, support may be partial, meaning only certain features are available. Blockchains with the most features available are the following: ● **Avalanche and Base**: all functionalities are available in Avalanche and Base, except the staking support ● **Ethereum**: all functionalities are available in Avalanche and Base, except the PAYG support.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		● **Solana**: all functionalities are available in Avalanche and Base, except the PAYG and staking support. On Ethereum and compatible blockchains, ALEPH adheres to the ERC-20 token standard, which guarantees fungibility and broad compatibility with wallets and exchanges. ALEPH utilises cross-chain bridges, enabling holders to move ALEPH tokens effortlessly across supported networks and enhancing interoperability. ALEPH is by Ethereum-compatible wallets.	
H.3	Technology used	The ALEPH token is an ERC-20 token available on several blockchains, including Ethereum, Solana, Base, Avalanche and Polygon. Its interoperability is facilitated by cross-chain bridges, allowing seamless movement of the token across these networks.	Free alphanumerical text
H.4	Consensus mechanism	Aleph Cloud uses a unique consensus mechanism that differs from traditional blockchain consensus models. Unlike traditional blockchains that use Proof of Work or Proof of Stake, Aleph Cloud employs a message-based consensus system with verification by Core Channel Nodes (CCNs). This approach allows for faster processing while maintaining security. There are numerous advantages of Aleph Cloud Consensus: ● **Speed**: Processing is fast because there is no mining or complicated consensus mechanism involved. ● **Efficiency**: The system uses fewer	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		resources than traditional blockchain consensus methods. ● **Flexibility**: It allows for different consensus rules depending on the type of message. ● **Scalability**: Performance remains strong as more nodes are added to the network.	
H.5	Incentive mechanisms and applicable fees	Marketing Pool within Aleph Cloud ecosystem will be used to fund incentives mechanisms. ● **Staking Rewards** Staking rewards serve as incentives for token holders who commit their ALEPH tokens to help secure the network and maintain decentralised resource nodes. By staking their tokens, participants enhance the network's stability and, in exchange, receive rewards in the form of extra ALEPH tokens. ● **Core Channel Node (CCN) Rewards** By running Core Channel Nodes (CCN), token holders contribute to the network reliability and security while earning ALEPH as compensation. Core channel nodes will stake and receive rewards, validate the network, control and manage the network, provide database and file storage services.	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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
H.7	DLT functionality description	DLT is a digital system for recording transactions in which the transactions and their details are recorded in multiple places at the same time. Unlike traditional databases, distributed ledgers have no central data store or administration functionality. Instead, the ledger is decentralised, and consensus on the transactions is achieved through a process that involves multiple nodes, each maintaining its own copy of the ledger. The benefits of DLT include increased transparency, enhanced security, improved traceability, and greater efficiency of transactions.	Free alphanumerical text
H.8	Audit	false	'true' – Yes 'false' – No
H.9	Audit outcome	To date, there is no publicly confirmed security audit for the ALEPH token.	Free alphanumerical text
Part I – Information on risks			
I.1	Offer-related risks	Aleph Cloud does not disclose any offer-relating risks. **Volatility** The price of ALEPH tokens can be highly volatile, subject to significant fluctuations driven by shifts in market sentiment, broader economic conditions, governance decisions within the ALEPH ecosystem, or new developments related to the ALEPH token itself. **Liquidity** Liquidity for ALEPH tokens may differ across centralised exchanges (CEXs) and	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		decentralised exchanges (DEXs). In periods of heightened market volatility or stress, liquidity may decrease, potentially restricting users' ability to buy or sell ALEPH tokens at desired prices. **Regulatory** Ongoing changes in global regulations regarding crypto-assets and blockchain technologies may impact the trading, utility, or listing status of the ALEPH token in various jurisdictions. **Centralisation** Contrary to other crypto-asset project, ALEPH governance is not decentralised. Key decisions are controlled by the core team, which may limit community influence and pose risks of unilateral changes or misaligned incentives. **Information Availability** The scarcity of reliable and detailed public information regarding key information about ALEPH token and its underlying operations can make it difficult for users and investors to make fully informed decisions. This lack of transparency increases the likelihood of misunderstandings or the spread of inaccurate information.	
I.2	Issuer-related risks	Aleph Cloud does not disclose any issuer-relating risks. **Project Continuity Risk** The value and utility of the Aleph Cloud token are closely tied to the ongoing development, maintenance, and long-term sustainability of the Aleph Cloud ecosystem. Any	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		interruptions, delays for features implementation, or setbacks in the project's progress could adversely affect the adoption and value of ALEPH. **Reputation** The growth and overall perception of ALEPH in the market are significantly influenced by its reputation. This impact is amplified when the majority of communication and updates are disseminated through social media platforms, like X and Telegram, which can shape public sentiment quickly and sometimes unpredictably. **Regulatory Exposure** Aleph Cloud operates within a dynamic and evolving regulatory landscape. Changes in regulations, new legal requirements, or enforcement actions related to crypto-assets and decentralised technologies could affect the token's accessibility, its ability to be listed on exchanges, and its legal standing in different jurisdictions. Such developments may limit the token's adoption and use. **Small Team** It appears that Aleph Cloud operates with a relatively small development team, which may present challenges in terms of development capacity and the timely achievement of roadmap goals.	
I.3	Crypto-assets-related risks	Aleph Cloud does not disclose any crypto-assets-relating risks.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Speculative Nature The value of ALEPH tokens is highly speculative and can experience considerable price volatility. Various factors (user adoption, market demand, liquidity) can contribute to swift and significant changes in the token's price. **Custodial Risk** Token holders are fully responsible for securing their private keys, wallet passwords, and recovery phrases. Loss or compromise of these keys can result in permanent loss of access to their tokens. **Risky Investment** There is a risk that users may lose some or all of tokens because of market volatility, security breaches, or loss of private keys. Potential investors should carefully consider these risks and understand that digital asset investments can result in partial or total financial loss. This risk is especially important considering ALEPH's low liquidity.	
I.4	Project implementation-related risks	Aleph Cloud does not disclose any project implementation-relating risks. **Technical Limitations** The development and deployment of ALEPH's platform features may encounter technical challenges, security vulnerabilities, or delays. Limited development resources or unforeseen complexities could impact the timely delivery and reliability of these functionalities. **Regulatory Developments** Increasing regulatory scrutiny on blockchain	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		projects platforms may lead to new compliance obligations or restrictions affecting Aleph Cloud. Such developments could constrain token usage, governance participation, or limit access on certain exchanges or jurisdictions. **Third-Party Reliance** ALEPH depends on various third-party technologies and services, including blockchain infrastructure providers, cross-chain bridges, oracle services. **Competition** As a highly competitive field, the project may encounter significant competition from well-established platforms, as well as cloud service providers.	
I.5	Technology-related risks	Aleph Cloud does not disclose any technology-relating risks. **Access** Users might not always be able to access their digital assets right away because of issues like network congestion, exchange limits, or technical problems. **Failures of the Protocol** Losses due to failing of the protocol may arise. Such losses may arise, without limitation, from inaccurate information, software or network malfunctions, corrupted digital wallet files, unauthorised access, errors, faults, or inaccuracies, or actions by third parties. **Smart Contract Vulnerabilities** Smart contracts may contain bugs or vulnerabilities that could be maliciously	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		exploited. **Security Risks** ALEPH tokens, like all digital assets, are exposed to cybersecurity threats such as hacking and phishing. Communication on social networks, although instantaneous, creates an additional risk of fraud. **Lack of Audit** ALEPH's smart contracts appear to have not been subjected to a formal security audit. Without an official audit, there is a heightened risk that vulnerabilities or malicious code could go unnoticed within the token's smart contract, increasing the potential for security issues. **Multi-blockchain Availability** Aleph Cloud's support for multiple blockchains may introduce complexity for users. This multi-chain architecture can lead to confusion and fragmentation, potentially creating barriers to adoption among non-technical users, especially considering that different features are available depending on the blockchain.	
I.6	Mitigation measures	Aleph Cloud did not disclose any information regarding its mitigation measures. However, based on publicly available information, the following measures exists: **Exchange Availability** ALEPH is or will be listed Revolut Digital Assets Europe Ltd enhancing access and liquidity. **Staking** The staking mechanism is non-custodial and highly flexible, featuring no lock-up period so	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		users can withdraw their tokens whenever they choose. This eliminates mandatory holding requirements and helps reduce the risk of panic-driven liquidations.	
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	Aleph Cloud does not publicly disclose its environmental impact metrics, carbon offset strategies, or sustainability roadmap.	Free alphanumerical text