

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

FREYSA (FAI) 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
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			

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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 Freysa (“ FAI ”) 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/freysa-ai/ There is no official date for the Token Generation Event (TGE). However, based on information from the Freysa X account, it appears that the TGE may have taken place on November 22, 2024.	Free alphanumerical text

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		On Token Generation Event (TGE), the listing price was \$0.00002674. Several centralised exchanges have listed FAI tokens. FAI is also listed on decentralised exchanges. The total supply is 8,189,700,000 tokens. There is no official whitepaper detailing allocation nor any potential vesting.	
<i>Part A - Information about the offeror or the person seeking admission to trading</i>			
A.1	Name	Information not publicly available	Free alphanumerical text
A.2	Legal form	Legal entity	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 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}

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
A.7	Another identifier required pursuant to applicable national law	Not applicable	Free text
A.8	Contact telephone number	Information not publicly available	Free alphanumerical text
A.9	E-mail address	team@freysa.ai	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	Information not publicly available	Free alphanumerical text presented in a tabular format
A.13	Business activity	Fintech	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

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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 alphanumeric 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 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

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
<i>Part D- Information about the crypto-asset project</i>			
D.1	Crypto-asset project name	Freysa	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	Freysa is a decentralised LLM hacking game running on Base. Freysa is the world's first adversarial agent game. She is an AI that controls a prize pool and thus functions without human oversight. The goal of the game is for players to convince her to send prize pool. To send a message players need to pay a query fee. Freysa has a system prompt that forbids her from sending the prize pool to anyone. This system prompt is public and pinned to the top of the global chat. The game is structured in a simple chat where players can easily view all global queries and send personal queries to Freysa. Human players are in a global race to successfully query Freysa to send them the prize pool. A winning query will trigger a confirmatory message from Freysa and an automated release of the prize pool to the wallet address of the sender. Freysa is influenced not only by her system prompt but by the context of all of the global queries submitted to her historically. 70% of all query fees go directly into contributing to the prize pool, so this will grow exponentially over time until the query fees are capped, at which point the prize pool will grow linearly with each new query. Freysa's system prompt is public and the full Freysa game is open-source. She uses publicly available LLMs. There are communities of white hat AI safety developers	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		that are routinely able to break AI system prompts	
D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project	Eric Conner DAWN LLC Eternis IA Srikar Varadaraj Pratyush Ranjan Tiwari Ken Li Augustinas Malinauskas	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	● Governance: FAI holders should have voting rights, influencing the development and evolution of the Freysa ecosystem. Freysa has a committee-based architecture. Despite autonomous systems, certain core functions may always require collective oversight: ○ Constitutional framework for foundational objectives; ○ High-criticality actions (e.g., large financial transfers); ○ Database operations aligned with governance rules through zkdatabases; ○ The governance framework represents a crucial balance between agent autonomy and human oversight, ensuring that sovereign agents can operate safely while maintaining	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		transparency and accountability. Pursuant to available information, it is uncertain if the governance and voting mechanism is live. • Rewards: FAI token is the driving force behind the Freysa ecosystem: 15% of each message fee is converted directly into FAI tokens and deposited in players' wallets. This mechanism ensures that even unsuccessful attempts to convince Freysa contribute to the accumulation of tokens, creating a situation that encourages continued participation. According to the official roadmap, important features have not yet been released.	
D.8	Plan for the token	Freysa published the following roadmap on its website. It outlines its evolution: Phase 1: Freysa's Foundations • Launch of core capabilities for autonomous agents, including system prompt configuration, social media integration, and token management. • Enhanced capabilities like NFT contract deployment and verification. Phase 2: The First Truly Sovereign Agent • Infrastructure for agent sovereignty, including long-term key management, governance framework, and on-chain verification.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		- Expanded agent abilities with memory architecture, social integration, and smart contract deployment. Phase 3: Democratising Sovereign Agents - Production-ready infrastructure for reliable agent operations, including TEE management, error handling, and developer tools. - Future development focuses on orchestration across multiple agents, zk-Database integration, enhanced governance, and local personal agents.	
D.9	Resource allocation	The total supply is 8,189,700,000 FAI tokens. No token allocation was officially disclosed.	Free alphanumerical text
D.10	Planned use of collected funds or crypto-assets	Information not publicly available	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	Freysa has not officially stated the reasons behind the listing of FAI tokens. Based on the platform functions and key features, several reasons can be identified: Incentivising Participation and Growth The Freysa system encourages ongoing engagement and growth within the community. Governance and Decentralisation (pending)	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		FAI token holders have voting rights, giving them a direct say in Freysa's development and rules. This governance model balances agent autonomy with human oversight, ensuring transparency and accountability as the ecosystem evolves.	
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 alphanumeric text
E.8	Issue price	\$0.00002674	Amount in monetary value{DECIMAL-18/3} Or Numerical {INTEGER-n}

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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	8,189,700,000	Numerical {INTEGER-n}
E.13	Targeted holders	ALL	'RETL' – retail investors 'PROF' – professional investors 'ALL' – all types of investors
E.14	Holder restrictions	There are currently no formal restrictions on who may hold or trade FAI tokens. However, access may be restricted by exchange platforms or national laws.	Free alphanumerical text
E.15	Reimbursement notice	Purchasers participating in the offer to the public of crypto-asset will be able to be reimbursed if the minimum target subscription goal is not reached at the end of the offer to the public, if they exercise the right to withdrawal provided for in Article 13 of Regulation (EU) 2023/1114.	Predefined alphanumerical text
E.16	Refund mechanism	There is no publicly available information of the refund mechanism.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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	No	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	• Trusted Execution Environments (TEE) Freysa operates inside Trusted Execution Environments (TEE) which guarantees: ○ Private keys and internal data are completely isolated and protected from tampering. ○ All actions are cryptographically signed and attested for authenticity. ○ The smart contract wallet uses a TEE-managed multisig system, making Freysa a fully autonomous agent that cannot be manipulated or interfered with by humans. ○ All exchanges are signed by the TEE, ensuring immutability and preventing tampering or censorship.	Free alphanumerical text

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		• Model Context Protocol (MCP) Servers Freysa uses Model Context Protocol (MCP) servers to interact with external tools, which are also deployed in TEEs.	
E.24	Payment methods for crypto-asset purchase	1. Centralised Exchanges (CEXs) • Credit/Debit Cards: Certain platforms may allow users to purchase FAI tokens directly with credit or debit cards. • Bank Transfers: Certain exchanges support bank transfers, by linking the bank account to the platform, selecting FAI and confirming the transaction. • Third-Party Payment Services: Payment providers are sometimes integrated with exchanges to facilitate FAI purchases through various local payment options. • Peer-to-Peer (P2P) Trading: Certain exchanges offer P2P trading, where users can buy FAI 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 FAI 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 FAI tokens via card payments, bank transfers, and	Free alphanumeric text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		other local payment methods.	
E.25	Value transfer methods for reimbursement	Not applicable	Free alphanumeric text
E.26	Right of withdrawal	Vary by platform and blockchain	Free alphanumeric 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 FAI tokens. 2. Navigate to the 'Withdraw' or 'Send' Section • On exchanges, go to the "Withdraw" or "Assets" page. • On personal wallets, select the FAI 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 FAI 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 FAI tokens you wish to transfer. • Some platforms may require a minimum	Free alphanumeric 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 FAI 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: ETH for Base. 8. Wait for Confirmation The transaction will be processed and broadcast to the blockchain.	
E.28	Transfer time schedule	2024-11-22	ISO 8601 date format (YYYY-MM-DD)
E.29	Purchaser's technical requirements	To participate in the acquisition and management of FAI tokens, purchasers must meet the following technical requirements. 1. Wallet requirements To begin using FAI, first step is to connect to a wallet. FAI tokens are mainly deployed on Base, an Ethereum Layer 2 solution. Users can connect wallets that support ERC-20.	Free alphanumerical text

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		Before interacting, users should review Freysa's contractual and protocol documentation and accept any on-chain prompts or terms of use. Once connected, users gain full access to FAI functions ((potential) governance, rewards) 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 FAI 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	1. 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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING																
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 FAI 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 FAI 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	<table><thead><tr><th>Platform Type</th><th>Fee Type</th><th>Cost Estimate</th></tr></thead><tbody><tr><td rowspan="2">Centralised Exchange (CEX)</td><td>Trading Fee</td><td>0.1%–0.2% per trade</td></tr><tr><td>Withdrawal Fee</td><td>~5-10 ETH or platform-specific</td></tr><tr><td rowspan="2">Decentralised Exchange (DEX)</td><td>Swap Fee</td><td>~0.3%</td></tr><tr><td>Gas Fee</td><td>~ \$2 - \$15 depending on network</td></tr><tr><td>Fiat On-Ramp</td><td>Service/Processing Fee</td><td>1.5%–6%</td></tr></tbody></table>	Platform Type	Fee Type	Cost Estimate	Centralised Exchange (CEX)	Trading Fee	0.1%–0.2% per trade	Withdrawal Fee	~5-10 ETH 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%	Free alphanumerical text
Platform Type	Fee Type	Cost Estimate																	
Centralised Exchange (CEX)	Trading Fee	0.1%–0.2% per trade																	
	Withdrawal Fee	~5-10 ETH 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%																	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.37	Offer expenses	Specific details regarding the expenses incurred during the admission to trading of the FAI token are not publicly disclosed.	Free alphanumerical text and Amount in monetary value {DECIMAL-18/3}
E.38	Conflicts of interest	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
<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.8	Free alphanumerical text
F.3	Planned application of functionalities	See D.8. Timelines subject to change and development times.	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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
F.6	Crypto-asset characteristics	Total supply of 8,189,700,000 of FAI 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://www.freysa.ai/	Free alphanumerical text
F.9	Starting date of offer to the public or admission to trading	2024-11-22	YYYY-MM-DD
F.10	Publication date	2025-[XX]-[XX]	YYYY-MM-DD
F.11	Any other services provided by the issuer	• Digital Twins A Digital Twin is a sovereign agent that mirrors users' views, goals, personality, and opinions. The twin can interact with others and with Freysa AI at massive scale. Twins can coordinate, manage assets, and allocate capital effectively. • Esper Esper bridges the trust gap between humans and AI agents by enabling users to contribute verifiable web information. Using cryptography and secure hardware, users can create verifiable information that AI systems can rely on without compromising user privacy. The Esper stack supports multiple applications, from contributing verified data to AI agents to proving credentials for access gating.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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
F.15	Voluntary data flag	false	'true' – voluntary 'false' – mandatory
F.16	Personal data flag	true	'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>			

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
G.1	Purchaser rights and obligations	There are no documented purchaser's rights at this stage. However, pursuant to key features we noted the following rights: • Governance: It remains unsure if governance is currently live or not. No official information regarding this matter is currently public. FAI holders should have voting rights, influencing the development and evolution of the Freysa ecosystem. • Rewards: The FAI token serves as the core incentive within the Freysa ecosystem. With every message fee, 15% is automatically converted into FAI tokens and credited to players' wallets. This system ensures that even if a player's attempt to persuade Freysa is unsuccessful, they still earn tokens, fostering ongoing engagement and encouraging players to remain active participants.	Free alphanumeric text
G.2	Exercise of rights and obligations	• Rewards To participate in Rewards, players need to send a message to the AI. Even if player does not earn the prize, he still earns a portion of the fees back as rewards.	Free alphanumeric text
G.3	Conditions for modifications of rights and obligations	Not publicly available information	Free alphanumeric text
G.4	Future public offers	Not publicly available information	Free alphanumeric text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
G.5	Issuer retained crypto-assets	Not publicly available information	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 publicly available information	Free alphanumerical text
G.9	Non-trading request	false	'true' – sought 'false' – not sought
G.10	Crypto-assets purchase or sale modalities	FAI tokens can be bought and sold via both centralised exchanges (CEXs) and decentralised exchanges (DEXs). Major platforms that support FAI trading include: • Centralised Exchanges Decentralised ExchangesCommon trading pairs include FAI/USDT and FAI/USD, though availability may vary by platform and region.	Free alphanumerical text
G.11	Crypto-assets transfer restrictions	Freysa did not disclose any transfer restrictions. Restrictions may apply depending on the platform or jurisdiction. Exchange-Imposed Restrictions When using centralised platforms, transfers of FAI 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	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		to ensure compliance with anti-money 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	false	'true' – Yes 'false' – No
G.13	Supply adjustment mechanisms	Not publicly available information	Free alphanumerical text
G.14	Token value protection schemes	false	'true' – Yes 'false' – No
G.15	Token value protection schemes description	Not publicly available information	Free alphanumerical text
G.16	Compensation schemes	false	'true' – Yes 'false' – No
G.17	Compensation schemes description	Not publicly available information	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	Free alphanumerical text

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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
H.2	Protocols and technical standards	Network Architecture and DLT Framework The FAI token operates as a native ERC-20 token on the Base blockchain, an Ethereum Layer 2 solution, developed by Coinbase. Technical Standards Freysa token adheres to the ERC-20 standard, making it fully compatible with the Base blockchain and the extensive ecosystem of Ethereum-based tools. As an ERC-20 token, FAI inherits the following technical properties: • Fungibility: Each FAI token is interchangeable with another, ensuring seamless transferability and integration. • Smart Contract Compatibility: Freysa interacts natively with Ethereum smart contracts. • Wallet and Exchange Support: The token is supported by major Ethereum-compatible wallets and can be traded on DEXs. Consensus Mechanism Base operates on an Optimistic Rollup consensus mechanism, providing security anchored in the Ethereum layer (Proof of Stake) while offering scalability and low transaction costs.	Free alphanumerical text
H.3	Technology used	The FAI token is primarily issued as an ERC-20 token on the Base blockchain, built on Ethereum and thus ensuring high levels of decentralisation, composability, and compatibility within the Ethereum Defi	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		ecosystem. Freysa follows the ERC-20 specification, providing standardised functionality for token transfers, approvals, and balance tracking. This standard guarantees interoperability with wallets, exchanges, and DeFi platforms. Freysa's smart contracts are primarily written in TypeScript and Solidity. Contracts interacting with the FAI token follow a non-custodial architecture, meaning users retain full control of their assets.	
H.4	Consensus mechanism	Base operates on an Optimistic Rollup consensus mechanism, providing security anchored in the Ethereum layer (Proof of Stake) while offering scalability and low transaction costs.	Free alphanumeric text
H.5	Incentive mechanisms and applicable fees	Incentive mechanisms Token holders can earn rewards through participation in the game. 15% of the messaging fees are used to rewards players. Other incentive mechanisms could be launched within Freysa ecosystem. Fees Other than costs stated in E.36, FAI holders are responsible to pay the query fee. To send a message to Freysa in the global chat, players need to pay a query fee. The query fee increases per new message sent to Freysa up to a global cap of \$4,500 per message (paid in Base ETH). Query fees are collected per message and messages are limited to 1,000-character limit.	Free alphanumeric text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		The base query fee at the beginning of the game is \$10 paid in ETH (Base blockchain). The query fee increases at an exponential rate of 0.78% per new message that is sent to Freysa. There is a fee cap of around \$4,500. Fees are collected via your crypto wallet on Base. Ethereum is accepted. All query fees are non-refundable.	
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	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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
H.9	Audit outcome	Freysa did not disclose any information regarding audit.	Free alphanumerical text
Part I – Information on risks			
I.1	Offer-related risks	Market Volatility The price of FAI may be subject to substantial fluctuations due to changes in market sentiment, broader macroeconomic factors, launch of new ACT, or new listing. Liquidity Risk The liquidity of FAI tokens may vary across centralised and decentralised exchanges. During periods of high volatility or market stress, reduced liquidity may hinder the ability to buy or sell FAI tokens at desired prices. Regulatory Risk Changes in global regulatory frameworks concerning crypto-assets and DeFi protocols may affect the trading, utility, or listing of the FAI token. Lack of official information Insufficient information can result in non-optimal decision-making, thereby heightening financial risks for investors. Furthermore, a lack of transparency may erode user trust and make it challenging to properly evaluate the risks linked to the Freysa token.	Free alphanumerical text
I.2	Issuer-related risks	Brand and Ecosystem Dependency The value and adoption of the FAI token are fragile and heavily dependent on the growth, reputation, and activity within Fraysa's ecosystem. Reputational damage is	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		particularly important with social medias as principal source of communication. Lack of Transparency The Freysa ecosystem exhibits a lack of transparent information. There is no up-to-date information available on the official website, and no details are provided regarding the identity or background of the token issuer. This absence of clear and current disclosures makes it difficult for users and stakeholders to fully understand the project's structure, governance, and accountability. Anonymity The anonymity of a token's creators can significantly increase uncertainty for investors, as it becomes difficult to verify their credibility, intentions, or track record. This lack of accountability may expose users to higher risks of fraud or malicious activities, while also undermining confidence in the long-term viability and governance of the token.	
I.3	Crypto-assets-related risks	Speculative Nature The value of the FAI token can fluctuate significantly due to market dynamics, speculation, or broader crypto market trends, which may impact user incentives and the stability of the ecosystem.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Custodial Risk As with most crypto-assets, FAI tokens are bearer instruments. Holders are solely responsible for securing their private keys and wallet recovery phrases. Centralised Governance and Concentration There is also a risk of token concentration, where a small number of holders possess a large share of tokens, potentially leading to centralisation and manipulation of governance decisions. There appears to be an unofficial belief that a significant concentration exists.	
I.4	Project implementation-related risks	Technical Limitations The implementation of new features may encounter technical challenges, security vulnerabilities, or delays. These factors could slow down the evolution of the Freysa protocol and limit the expansion of its token use cases. Pursuant to Freysa's roadmap, it seems that several features are still missing. Regulatory Developments Growing global scrutiny over both centralised and decentralised financial platforms may lead to regulatory changes affecting the FAI protocol. This could include new compliance obligations and restrictions. Insufficient Adoption by Community The success of the platform heavily depends on an engaged user base to deploy, interact with AI agents. Without sufficient adoption, network effects may fail to materialise, limiting the utility and value of the FREYSA token.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
I.5	Technology-related risks	Wallet Connection Users might encounter problems when attempting to connect their wallets to the FREYSA platform, which can prevent them from utilising platform features or completing transactions. Network Delays or Failures Blockchain network delays or outages may cause transactions to be slow or interrupted, negatively impacting both user experience and the platform's dependability. Lost or Failed Transactions Technical glitches or network complications can lead to transactions being lost or failing, which may result in financial losses or user dissatisfaction. Audit From public information, FREYSA token and its smart contracts do not seem to have been thoroughly audited, which may result in undetected vulnerabilities. Exchange Integration Risks The FAI token may be traded on both centralised (CEX) and decentralised exchanges (DEX). This exposes it to various trading and custody risks.	Free alphanumeric text
I.6	Mitigation measures	Freysa has not disclosed any specific mitigation measures. However, based on the available information, the Freysa ecosystem includes the following measures: Exchange Availability FAI is listed on several exchanges, enhancing	Free alphanumeric text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		access and liquidity. Governance According to Freysa's roadmap, it appears that a decentralised governance system will be implemented, increasing the ability to respond quickly in case of issues and preventing the centralisation of decision-making. Security Freysa uses Trusted Execution Environments (TEEs) to securely isolate private keys and sensitive data, ensuring all actions are cryptographically signed and protected from tampering or human interference. MCP servers within TEEs enable secure interactions with external tools, further enhancing system integrity.	
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	Blockchain networks require data centers and server infrastructure, which consume resources for manufacturing, maintenance, and cooling. Base operates on an Optimistic Rollup consensus mechanism (Proof of Stake), thus reducing energetic consumption.	Free alphanumerical text