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

GRASS (GRASS) Token White Paper

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

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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Not applicable **Part C - Information about the operator of the trading platform in cases where it draws up the crypto-asset white paper and information about other persons** C.1 Name C.2 Legal form C.3 Registered address C.4 Head office C.5 Registration Date C.6 Legal entity identifier C.7 Another identifier required pursuant to applicable national law C.8 Parent company C.9 Reason for crypto-Asset white paper Preparation C.10 Members of the Management body C.11 Operator business activity C.12 Parent company business activity C.13 Other persons drawing up the crypto-asset white paper according to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114 C.14 Reason for drawing the white paper by persons referred to in Article 6(1), second subparagraph, of Regulation (EU) 2023/1114 **Part D - Information about the crypto-asset project** D.1 Crypto-asset project name D.2 Crypto-assets name D.3 Abbreviation D.4 Crypto-asset project description D.5 Details of all natural or legal persons involved in the implementation of the crypto-asset project 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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
03	Compliance statement in accordance with Article 6(6) of Regulation (EU) 2023/1114	This crypto-asset white paper complies with Title II of Regulation (EU) 2023/1114 of the European Parliament and of the Council and, to the best of the knowledge of the management body, the information presented in the crypto-asset white paper is fair, clear and not misleading and the crypto-asset white paper makes no omission likely to affect its import.	Predefined alphanumerical text
04	Statement in accordance with Article 6(5), points (a), (b), (c), of Regulation (EU) 2023/1114	The crypto-asset referred to in this crypto-asset white paper may lose its value in part or in full, may not always be transferable and may not be liquid.	Predefined alphanumerical text
05	Statement in accordance with Article 6(5), point (d), of Regulation (EU) 2023/1114	true The utility token referred to in this white paper may not be exchangeable against the good or service promised in this white paper, especially in the case of a failure or discontinuation of the crypto-asset project.	'true' – Yes 'false' – Not applicable If Yes, Predefined alphanumerical text
06	Statement in accordance with Article 6(5), points (e) and (f), of Regulation (EU) 2023/1114	The crypto-asset referred to in this white paper is not covered by the investor compensation schemes under Directive 97/9/EC of the European Parliament and of the Council or the deposit guarantee schemes under Directive 2014/49/EU of the European Parliament and of the Council.	Predefined alphanumerical text
SUMMARY			

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
07	Warning in accordance with Article 6(7), second subparagraph, of Regulation (EU) 2023/1114	Warning This summary should be read as an introduction to the crypto-asset white paper. The prospective holder should base any decision to purchase this crypto-asset on the content of the crypto- asset white paper as a whole and not on the summary alone. The offer to the public of this crypto-asset does not constitute an offer or solicitation to purchase financial instruments and any such offer or solicitation can be made only by means of a prospectus or other offer documents pursuant to the applicable national law. This crypto-asset white paper does not constitute a prospectus as referred to in Regulation (EU) 2017/1129 of the European Parliament and of the Council or any other offer document pursuant to Union or national law.	Predefined alphanumerical text
08	Characteristics of the crypto-asset	The GRASS (“**GRASS**”) 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**”). GRASS is a native utility token of the GRASS ecosystem, designed to reward users who share their internet bandwidth through the decentralised GRASS network. It functions both as an incentive mechanism and a governance tool, allowing holders to participate in protocol decisions.	Free alphanumerical text
09		Not applicable.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
10	Key information about the offer to the public or admission to trading	https://coinmarketcap.com/currencies/grass/ The public listing of GRASS token (admission to trading) occurred on October 28, 2024, with a listing price per GRASS token ranged from $0.8 to $1. The GRASS token placement took place on several major exchanges. The total supply of GRASS tokens will remain fixed at 1,000,000,000 tokens. The initial circulating supply of GRASS tokens is 25%. A token distribution schedule governs the gradual release or unlocking of GRASS tokens in accordance with a predetermined monthly timetable. The distribution is structured with several airdrops. Each airdrop is structured around a series of epochs, each with a specific allocation of tokens. Allocations for each epoch are divided into nine tiers. Tiers are determined based on GRASS Points earned from network uptime and referrals, with higher GRASS Points placing participants in higher tiers. ● GRASS Airdrop One: 100,000,000 GRASS tokens were allocated to early users and community members on October 28, 2024; ● GRASS Network is preparing for the second airdrop which is scheduled to start in July or August 2025. The precise timeline is not public yet. In this phase, 17% of the total GRASS supply is allocated for new incentives: ● Live Context Retrieval (LCR): This feature enhances data processing and interaction with real-time information.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		● Hardware Innovations: GRASS is introducing new hardware options to optimise user experience and make it easier to share bandwidth. ● Mobile App Launch: A mobile application is on the way, enhancing accessibility for users on smartphones. ● Enhanced Earning Opportunities: Participants will find more ways to engage and earn points through community activities. The total supply of 1 billion GRASS tokens is allocated over a number of years. This unlocking schedule is structured into several phases, each corresponding to a specific allocation category. The GRASS token allocation will be as follows: ● Community: 30%; ● Investors: 25.2%; ● Contributors: 22%; and ● Foundation and Ecosystem Growth: 22.8%.	
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	support@grassfoundation.io.	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	Andrej Radonjic, co-founder and CEO	Free alphanumerical text presented in a tabular format
A.13	Business activity	Fintech	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
A.14	Parent company business activity	Information not publicly available	Free alphanumerical text
A.15	Newly established	false	‘true’ – Yes ‘false’ – No
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	Free alphanumerical text

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

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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
C.11	Operator business activity	Revolut Digital Assets Europe Ltd is a financial technology company registered as a crypto-assets services provider by the Cyprus Securities and Exchange Commission. Revolut Digital Assets Europe Ltd provides crypto-asset services across the European Union, including buying, selling, and exchange of crypto-assets. Revolut Digital Assets Europe Ltd has applied to the Cyprus Securities and Exchange Commission for a crypto-asset services provider (CASP) authorisation under Regulation (EU) 2023/1114. The authorisation is expected to cover the following crypto-asset services: ● exchange of crypto-assets for funds ● exchange of crypto-assets for crypto-assets ● operation of a Trading Platform ● custody and administration of crypto-assets ● transfer of crypto-assets	Free alphanumerical text
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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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	GRASS	Free alphanumerical text
D.2	Crypto-assets name	See DTI in F.13	Free alphanumerical text
D.3	Abbreviation	See DTI in F.13	Free alphanumerical text
D.4	Crypto-asset project description	The GRASS token is the native utility and governance token within the GRASS ecosystem, specifically designed to incentive and reward users who contribute their internet bandwidth to the network. In exchange for sharing their bandwidth and supporting the network's operations, participants receive GRASS tokens. These tokens serve multiple purposes within the ecosystem. Firstly, they act as a direct reward, providing tangible value to users for their contributions. Secondly, GRASS tokens grant holders the ability to participate in the governance activities. The ecosystem allocation will be aimed at scaling the GRASS ecosystem, through supporting community and growth initiatives like network upgrades and partnerships. This will be reserved for use as directed by decentralised autonomous organisation (DAO) governance. The overarching objective of the GRASS	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		project is to build a decentralised, secure, and privacy-respecting data access network. By leveraging the collective bandwidth of its users, GRASS aims to democratise access to public web data, making it more transparent and accessible while maintaining high standards of user protection. The project places a strong emphasis on transparency, security, and the safeguarding of user interests.	
D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project	Grass OpCo (BVI) Ltd Andrej Radonjic Grass Foundation Wynd Labs	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	Key features of the GRASS token include: ● Governance Rights Holders: GRASS tokens grant the ability to participate in the governance of the project, including proposing and voting on network improvements, aligning on which organisations to work with, and determining incentive mechanisms for all stakeholders. ● Incentives and Rewards: GRASS tokens are distributed as rewards to users who contribute to the network by sharing unused internet bandwidth. ● Allocation: The community allocation is the cornerstone of GRASS's ecosystem, aimed at building a robust user base that actively participates in the network.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		● Live Context Retrieval: GRASS Network's Live Context Retrieval (LCR) engine represents a significant advancement in AI data access. Unlike traditional AI models that rely on static datasets, LCR enables real-time access to internet data, providing AI models with up-to-date information as it becomes available. ● Network architecture and technical innovation: GRASS operates through a Sovereign Data Rollup system. The network's node infrastructure forms the backbone of the system, with validators ensuring data integrity and routers managing traffic flow. The ZK processor handles data verification, while the Data ledger maintains a record of all network activities. This architecture enables efficient scaling while maintaining security and transparency. ● Vestion period: early investors and contributors has respectively a 1-year and a 3-year vesting period. Locked tokens cannot be staked until they are vested. This strategy ensures that tokens remain locked during the early stages, preventing immediate sell-offs and stabilising the market. ● Staking: GRASS staking allows token holders to contribute to the security and operation of the GRASS network while earning rewards. There is no minimum staking period, and rewards are distributed every second. Moreover, there is a 7-day unstaking period during which GRASS tokens remain locked before becoming available for	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		withdrawal. ● Stake delegation involves a shared-risk, shared-reward financial model that potentially yields returns for long-term token holders. Routers bear costs for running and maintaining their infrastructure, which they offset by charging a commission on the rewards earned.	
D.8	Plans for the token	The immediate roadmap focusing on artificial intelligence (AI) and decentralised data processing has been made public. ● Multimodal Search: The platform plans to semantically enable AI models to search for insights from video, audio, and text data in real time. ● Expansion: GRASS also plans new distribution methods to expand its reach through mobile and other platforms, simplifying user access and participation. ● Gradual depreciation of GRASS chrome extension: The platform will deprecate the Chrome extension, bringing on board a stronger and more efficient desktop node. ● The platform will introduce horizontal scaling, a new product to scale its capabilities further, ensuring continued growth and innovation.	Free alphanumerical text
D.9	Resource allocation	Offering initially made 2024-10-28 with 243,905,091 in circulation. The 228,000,000 GRASS Tokens allocated to the Foundation & Ecosystem Growth will be used to support the ongoing operations of the	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		GRASS Network. The ecosystem allocation will be aimed at scaling the GRASS ecosystem, through supporting community and growth initiatives like network upgrades, partnerships, research and development. This will be reserved for use as directed by decentralised autonomous organisation (DAO) governance. Furthermore, the 300,000,000 GRASS tokens designated for the community will be used for: ● Future Incentives (170,000,000 tokens) which will focus on retroactive programs that recognise early contributors and compensate creators who build valuable content or tools for the network; and ● Router Rewards (30,000,000 tokens): an initial pool of rewards has been set aside to incentivise routers and support early infrastructure development.	
D.10	Planned use of collected funds or crypto-assets	Token distribution and allocation: ● Community allocation: 30% of the total supply is designated for the community. It includes: - Future Incentives (17%) which will focus on retroactive programs that recognise early contributors and compensate creators who build valuable content or tools for the network; - Router Rewards (3%): an initial pool of rewards has been set aside to incentivise routers and support early infrastructure development; and - Airdrop one (10%): the first airdrop	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		is one of the most widely distributed airdrops in history and represents a crucial step toward building the first user-owned map of the Internet. ● Foundation & Ecosystem Growth: 22.8%. This allocation will be held by the foundation to support the ongoing operations of the GRASS Network. The ecosystem allocation will be aimed at scaling the GRASS ecosystem, through supporting community and growth initiatives like network upgrades, partnerships, research and development. This will be reserved for use as directed by decentralised autonomous organisation (DAO) governance. ● Early Investors: 25.2%. Targeted at early supporters, this allocation features a 1-year cliff followed by a 1-year vesting period. ● Contributors (22%): Core contributors also face a 1-year cliff with a 3-year vesting schedule. This measure secures the long-term commitment of those vital to the project’s success, reinforcing the development team's dedication to sustained growth and innovation.	
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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.2	Reasons for public offer or admission to trading	1. **Rewards**: Incentive users to contribute bandwidth and recommend others. 2. **Governance**: Token holders can participate in network decision-making, including voting proposals and partner choices. 3. **Staking**: Users can pledge GRASS tokens to the router, support network traffic, earn rewards, no minimum period, and the unlocking period is 7 days.	Free alphanumerical text
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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.8	Issue price	0.8 to 1	Amount in monetary value{DECIMAL-18/3} Or Numerical {INTEGER-n}
E.9	Official currency or any other crypto-assets determining the issue price	USD	{CURRENCYCODE_3} or {DTI}
E.10	Subscription fee	0	Amount in monetary value {DECIMAL-18/3} Or Numerical {INTEGER-n}
E.11	Offer price determination method	Price determined by supply and demand	Free alphanumerical text
E.12	Total number of offered/traded crypto-assets	1,000,000,000	Numerical {INTEGER-n}
E.13	Targeted holders	ALL	'RETL' – retail investors 'PROF' – professional investors 'ALL' – all types of investors
E.14	Holder restrictions	Institutional buyers and individual purchasers must meet the necessary regulatory and jurisdictional requirements. Certain investor categories, such as retail investors in restricted regions, politically exposed persons (PEPs), and users flagged under AML risk assessments, may be restricted from participating in the sale. Further, GRASS tokens acquired may be	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		subject to cliff and vesting period.	
E.15	Reimbursement notice	Not applicable	Predefined alphanumerical text
E.16	Refund mechanism	There is no publicly available information of the refund mechanism.	Free alphanumerical text
E.17	Refund timeline	There is no publicly available information on the refund timeline.	Free alphanumerical text
E.18	Offer phases	A token distribution schedule governs the gradual release or unlocking of GRASS tokens in accordance with a predetermined monthly timetable. The distribution is structured with several airdrops. Each airdrop is structured around a series of epochs, each with a specific allocation of tokens. Allocations for each epoch are divided into nine tiers. Tiers are determined based on GRASS Points earned from network uptime and referrals, with higher GRASS Points placing participants in higher tiers. ● Starting October 28, 2024, Airdrop One allocates 100,000,000 GRASS (10% of total supply) to early users and community members. The claiming window has ended on March 27, 2025. ● GRASS Network is preparing for the second airdrop in July or August 2025.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.19	Early purchase discount	Not applicable	Free alphanumerical text
E.20	Time-limited offer	false	‘true’- Yes ‘false’ – No
E.21	Subscription period beginning	Not applicable	ISO 8601 date format (YYYY-MM-DD)
E.22	Subscription period end	Not applicable	ISO 8601 date format (YYYY-MM-DD)
E.23	Safeguarding arrangements for offered funds/crypto- Assets	**1. Airdrop programs** GRASS has implemented a technological and organisational security program and risk assessment protocol applicable to Airdrops conducted by GRASS as part of the GRASS Airdrop Program and any related claims made by participants in connection with an Airdrop and the GRASS Airdrop Program. GRASS and its third-party service providers screen claims and apply screening criteria that may extend beyond screening requirements set out under applicable laws. All claims for GRASS Tokens made through an Airdrop or the GRASS Airdrop Program are subject to geo-location and proxy detection controls to prevent access to an Airdrop, the GRASS Airdrop Program, and associated websites by excluded persons. GRASS may deny any person, IP address, digital asset, smart contract, or protocol address access to an Airdrop and the GRASS	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Airdrop Program or associated websites based on information identified by GRASS's security measures and related risk assessment protocols. GRASS reserves the right to take any additional steps it deems necessary to verify the identity and eligibility of any person who seeks to participate, directly or indirectly, in an Airdrop or the GRASS Airdrop Program, including with respect to the claiming or receipt of any GRASS Tokens. **2. Cybersecurity** Internally, GRASS uses internet encryption to ensure clients are fully protected while sharing internet connection. GRASS also works with AppEsteem, a leading cybersecurity compliance auditor, who monitors GRASS products for vulnerabilities, leaks, backdoors, and malware. GRASS has been even successfully integrated with AppEsteem and achieved the highly regarded AppEsteem certification that showcases commitment to security. GRASS also makes every effort to stay up to date on the latest developments in cybersecurity and are at the forefront of helping advance anti-malware solutions. GRASS is a contributor to the AMTSO, which is bringing together leading cybersecurity industry experts, including CSA and Nord Security, to share knowledge and collaborate on issues that will make the digital world a safer place. **3. Custodian** Hex Trust, a leading provider of digital asset solutions for institutional finance and the Web3	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		ecosystem, partners with GRASS. Hex Trust is the official custodian of GRASS, especially with their token generation events. It provides integrated solutions that combine custody, staking and prime solutions. Clients are able to access, trade, store and stake GRASS token from a secure and insured custody environment. **4. Partnership** Working with industry leaders like Avast, Microsoft Defender, McAfee, and AVG, Grass has been designed from the ground up with user protection in mind.	
E.24	Payment methods for crypto-asset purchase	**1. Centralised Exchanges (CEXs)** ● **Credit/Debit Cards:** Certain platforms allow direct purchases of GRASS tokens using credit or debit cards. ● **Bank Transfers:** Certain exchanges support bank transfers, including wire and ACH deposits, which can be used to fund the account prior to buying GRASS tokens. ● **Third-Party Payment Services:** Some platforms accept payments via third-party payment services like Apple Pay and Google Pay, providing additional convenience when purchasing GRASS tokens. ● **Peer-to-Peer (P2P) Trading:** Certain exchanges facilitate P2P trading, enabling users to buy GRASS	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		tokens directly from others using local payment methods such as bank transfers and digital wallets. It is recommended to use platforms with escrow protection for secure transactions. 2. **Decentralised Exchanges (DEXs)** ● **Cryptocurrency Swaps:** On certain decentralised platforms, users can swap other cryptocurrencies (e.g., ETH or USDT) for GRASS tokens. This process requires a compatible crypto wallet and an understanding of gas fees and slippage. 3. **Fiat On-Ramp Services** ● **Payment Gateways:** Some services allow direct card payments for GRASS tokens without needing an exchange account. These platforms typically support multiple fiat currencies and offer a simple purchase experience.	
E.25	Value transfer methods for reimbursement	Not applicable	Free alphanumerical text
E.26	Right of withdrawal	There is no publicly available information indicating a right of withdrawal for GRASS tokens.	Free alphanumerical text
E.27	Transfer of purchased crypto-assets	The GRASS token follows a progressive transfer and accessibility model, starting by earning GRASS points by sharing excess Internet bandwidth and participating in airdrops, if eligible.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Stage 1: Token issuance (Oct 28, 2024) ● The First Airdrop officially begin on October 28, 2024 ● Distributed primarily to early users and community members **Stage 2: Token claim** ● **Visit the Official Claim Page:** Navigate to the Grass airdrop claim page to start the process. ● **Connect Your Wallet:** Ensure you have an eligible wallet and connect it to access your claimable tokens. ● **Check Your Claimable Amount:** After connecting your wallet, you can see how many tokens are available for you to claim based on the GRASS points you earned. ● **Accept Terms and Conditions:** Read and accept the terms and conditions of the airdrop. ● **Complete the Claim Process:** Follow the prompts to finalise your claim, and your GRASS tokens will be transferred to your wallet.	
E.28	Transfer time schedule	A token distribution schedule governs the gradual release or unlocking of GRASS tokens in accordance with a predetermined monthly timetable. The distribution is structured with several airdrops. Each airdrop is structured around a series of epochs, each with a specific allocation of tokens.	ISO 8601 date format (YYYY-MM-DD)

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Allocations for each epoch are divided into nine tiers. Tiers are determined based on GRASS Points earned from network uptime and referrals, with higher GRASS Points placing participants in higher tiers. GRASS Airdrop One: 100,000,000 GRASS tokens were allocated to early users and community members on October 28, 2024; GRASS Network is preparing for the second airdrop which is scheduled to start in July or August 2025.	
E.29	Purchaser's technical requirements	1. **Access Your Wallet or Exchange Account** • **Centralised exchange**: Log in to your account. • **Personal wallet**: Open your non-custodial crypto wallet compatible with Solana that holds your GRASS tokens. 2. **Navigate to the ‘Withdraw’ or ‘Send’ Section** • On exchanges, go to the “Withdraw” or “Assets” page. • On wallets, select GRASS, then tap or click “Send”. 3. **Enter the Recipient’s Wallet Address** • Paste the correct wallet address of the recipient. • Make sure their wallet supports GRASS tokens on the correct blockchain (e.g., Solana). 4. **Specify the Amount**	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		● Enter the number of GRASS tokens you wish to transfer. ● Some exchanges may impose a minimum transfer amount. **5. Review and Confirm the Transfer** ● On centralised platforms, you may need to pass 2FA verification or enter a withdrawal password. **6. Pay the Network Fee** ● Blockchain transfers require a network (gas) fee, paid in the native currency of the selected chain **7. Wait for Confirmation** ● Your transaction will be broadcast to the blockchain and processed shortly.	
E.30	Crypto-asset service provider (CASP) name	Revolut Digital Assets Europe Ltd	Free alphanumerical text
E.31	CASP identifier	549300ET4IUR6RCZOL84	{LEI}
E.32	Placement form	NTAV	‘WITH- with a firm commitment basis ‘WOUT’ - without a firm commitment basis ‘NTAV’ - Not applicable
E.33	Trading platforms name	Revolut Digital Assets Europe Ltd	Free alphanumerical text

<table>
<tr><th>No</th><th>FIELD</th><th>CONTENT TO BE REPORTED</th><th>FORM AND STANDARDS TO BE USED FOR REPORTING</th></tr>
<tr><td>E.34</td><td>Trading platforms
Market identifier code (MIC)</td><td>Not applicable</td><td>{MIC}</td></tr>
<tr><td>E.35</td><td>Trading platforms access</td><td>While access procedures may vary slightly across trading platforms, the following example illustrates a typical process
1. CEX
1. Sign up and complete identity verification (KYC)
2. Deposit USDT or transfer from another wallet
3. Go to the Trade section, search for GRASS/USDT
4. Execute trade.</td><td>Free alphanumerical text</td></tr>
<tr><td>E.36</td><td>Involved costs</td><td>
<table>
<tr><th>Platform Type</th><th>Fee Type</th><th>Cost Estimate</th></tr>
<tr><td>Centralised Exchange (CEX)</td><td>Trading Fee</td><td>0.1%–0.2% per trade</td></tr>
<tr><td></td><td>Withdrawal Fee</td><td>~0.1-1 GRASS or platform-specific</td></tr>
<tr><td>Decentralised Exchange (DEX)</td><td>Swap Fee</td><td>~0.3</td></tr>
<tr><td></td><td>Gas Fee</td><td><$0.01 per trade</td></tr>
<tr><td>Fiat On-Ramp</td><td>Service/Processing Fee</td><td>2% - 5%</td></tr>
</table>
</td><td>Free alphanumerical text</td></tr>
</table>

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.37	Offer expenses	Not applicable	Free alphanumerical text and Amount in monetary value {DECIMAL-18/3}
E.38	Conflicts of interest	No conflicts of interest	Free alphanumerical text
E.39	Applicable law	Information not publicly available	Drop-down list of applicable laws
E.40	Competent court	Information not publicly available	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
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 1,000,000,000 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.grass.io/	Free alphanumerical text
F.9	Starting date of offer to the public or admission to trading	2024-10-28	YYYY-MM-DD
F.10	Publication date	2025-[XX]-[XX]	YYYY-MM-DD
F.11	Any other services provided by the issuer	No	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 applicable	ISO 24165 Digital Token Identifier
F.14	Functionally fungible group digital token identifier, where available	Not applicable	ISO 24165 FFG DTI
F.15	Voluntary data flag	false	‘true’ – voluntary ‘false’ – mandatory

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
F.16	Personal data flag	false	'true' – Yes 'false' – No
F.17	LEI eligibility	false	'true' – eligible 'false' – not eligible
F.18	Home Member State	Republic of Cyprus	Closed list of EU Member States
F.19	Host Member States	Austria, Belgium, Bulgaria, Croatia, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden.	Closed list of EU Member States
Part G - Information on the rights and obligations attached to the crypto-assets			
G.1	Purchaser rights and obligations	Purchasers of the GRASS token acquire governance rights. GRASS tokens grant the ability to participate in the governance of the project including proposing and voting on network improvements, aligning on which organisations to work with, and determining incentive mechanisms for all stakeholders.	Free alphanumerical text
G.2	Exercise of rights and obligations	Governance voting rights are proportional to token holdings. Major decisions regarding protocol upgrades, treasury allocations, and new features require community approval through on-chain voting. Proposal submission requires a minimum token threshold to prevent spam. This ensures only serious, well-considered ideas reach the voting stage.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Community members can join working groups focused on specific aspects of the ecosystem: ● Technical development ● Marketing and growth ● Treasury management ● Partner relationships These initiatives help maintain an engaged community beyond the initial airdrop excitement.	
G.3	Conditions for modifications of rights and obligations	Information not publicly available	Free alphanumerical text
G.4	Future public offers	GRASS Network is preparing for the second airdrop which is scheduled to start in July or August 2025. In this phase, 17% of the total GRASS supply is allocated for new incentives: ● Live Context Retrieval (LCR): This feature enhances data processing and interaction with real-time information. ● Hardware Innovations: GRASS is introducing new hardware options to optimise user experience and make it easier to share bandwidth. ● Mobile App Launch: A mobile application is on the way, enhancing accessibility for users on smartphones. ● Enhanced Earning Opportunities: Participants will find more ways to engage and earn points through community activities.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
G.5	Issuer retained crypto-assets	Pursuant to the allocation provided by Grass, 22.8% of the total supply will be allocated to the Foundation and Ecosystem Growth.	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	No 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	GRASS tokens can be bought and sold via both centralised exchanges (CEXs) and decentralised exchanges (DEXs).Common trading pairs include GRASS/USDT, GRASS/USDC, GRASS/SOL, and GRASS/ETH, though availability may vary by platform and region.	Free alphanumerical text
G.11	Crypto-assets transfer restrictions	1. **Use of VPNs** GRASS reserves the right to disqualify participants for using VPNs to circumvent geographic restrictions. Participants found in violation may be permanently disqualified, and any claimed tokens may be revoked. 2. **Eligibility criteria** GRASS will determine the eligibility criteria for participation in any Airdrop or the GRASS Airdrop Program, including with respect to the	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		claiming or receipt of GRASS Tokens and the number of GRASS Tokens to be distributed to eligible participants. GRASS Tokens will only be distributed to participants that meet the eligibility criteria determined by GRASS for any Airdrop and the GRASS Airdrop Program. GRASS reserves the right to disqualify or exclude any actual or potential participant that it deems ineligible for participation in any Airdrop or the GRASS Airdrop Program, including as a result of the participant's actual or alleged breach of these Airdrop Program Terms or the General Terms. Eligible participants may receive different amounts of GRASS Tokens depending on the criteria determined by GRASS in connection with the applicable Airdrop. GRASS has no obligation to notify any actual or potential participants of the eligibility criteria for any Airdrop prior to, during, or after claims for the Airdrop are opened or GRASS Tokens are distributed or received. **3. Restricted Person and Minor** The GRASS Services and the GRASS Network may not be accessed or used by (a) any person or entity that (i) resides in, is located, is incorporated, or has an office in any jurisdiction that is subject to any economic or financial sanctions; (ii) any person who resides in any jurisdiction where your access to or use of the GRASS Services or participation in the GRASS Network is illegal or not permitted by applicable law; or (iii) any person or entity that is the subject of any economic or financial sanction (each, a "**Restricted Person**"); or (b) any individual who is under the age of majority in their	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		jurisdiction of residence (each, a **Minor**). Restricted Person or Minor are not permitted to access, use, or download the GRASS Services or participate in the GRASS Network. Use of a virtual private network to circumvent the restrictions set out in these Terms is strictly prohibited. **4. Cliff period and vesting period** Early Investors and Contributors are subjected to a cliff and a vesting period. Early investors are subject to a 1-year cliff followed by a 1-year vesting period, and Contributors are subject to a 1-year cliff with a 3-year vesting schedule. Locked tokens cannot be staked until they are vested.	
G.12	Supply adjustment protocols	false	'true' – Yes 'false' – No
G.13	Supply adjustment mechanisms	Not applicable	Free alphanumerical text
G.14	Token value protection schemes	true	'true' – Yes 'false' – No
G.15	Token value protection schemes description	The GRASS token employs multiple value protection schemes to maintain price stability and promote sustainable ecosystem growth: 1. **Staking with rewards:** Token holders can stake their GRASS tokens to actively support the network. Staking not only grants rewards but also locks tokens, reducing the circulating supply and discouraging large-scale sell-offs. 2. **Participation-based distribution:** Rather than relying on direct token sales, GRASS	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		tokens are distributed based on users' actual contributions to the network through Grass Points. This mechanism aligns token issuance with real usage, helping control inflation and preventing oversupply. 3. **Vesting and lock-up periods:** Certain token allocations are subject to vesting schedules or lock-up periods. This prevents immediate liquidation, limiting sudden supply shocks on the market.	
G.16	Compensation schemes	false	'true' – Yes 'false' – No
G.17	Compensation schemes description	Not applicable	Free alphanumerical text
G.18	Applicable law	No publicly available information	Drop-down list of applicable laws
G.19	Competent court	No 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	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		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.	
H.2	Protocols and technical standards	**Primary network**: Solana Blockchain **DLT Type**: Blockchain (Layer 1 Solana with Layer 2 rollup) **Consensus Mechanism**: Proof of History combined with Proof of Stake (Solana) **Token Standard**: SPL Token (Solana Program Library standard) **Smart Contract Platform**: Solana Runtime (not EVM-compatible) **Interoperability**: Compatible with Solana wallets and decentralised applications (dApps) **Security**: Secured by Solana's cryptographic protocols and decentralised validation	Free alphanumerical text
H.3	Technology used	GRASS leverages the Solana blockchain as a Layer 2 data rollup to provide scalable and	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		secure decentralised data processing. By combining Solana's Proof of History and Proof of Stake consensus mechanisms, GRASS ensures high throughput and low latency. The token conforms to the SPL standard, enabling seamless integration within the Solana ecosystem. Off-chain zero-knowledge proofs support privacy-preserving data verification, while smart contracts run efficiently on Solana's Rust-based environment	
H.4	Consensus mechanism	**Primary consensus**: Solana uses a unique combination of Proof of History (PoH) and Proof of Stake (PoS). ● **Proof of History (PoH)** provides a cryptographic timestamp to order events efficiently and securely. ● **Proof of Stake (PoS)** secures the network by having validators stake SOL tokens to validate blocks. **GRASS layer**: GRASS functions as a **Layer 2 rollup** on Solana, which batches data and transactions off-chain and then submits proofs on-chain for final settlement and verification.	Free alphanumerical text
H.5	Incentive mechanisms and applicable fees	**Transaction Fees (Gas Fees)**: Since GRASS is a SPL token on Solana, transfers require payment of transaction fees in SOL. **Exchange Fees:** If trading GRASS tokens on centralised or decentralised exchanges, standard trading fees apply (e.g., ~0.1% per trade on CEX platforms, plus possible withdrawal fees). **Participation-based Distribution**: Instead of purchasing tokens directly, users receive	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		GRASS tokens based on their active participation and support of the network. **Staking & Governance**: GRASS offers staking rewards, governance voting, or liquidity incentives.	
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
H.9	Audit outcome	Not applicable	Free alphanumerical text
Part I – Information on risks			
I.1	Offer-related risks	1. **Regulatory Risks** ● **Unregistered Offering**: If the token	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		sale was conducted without registration or proper exemption under securities laws in certain jurisdictions, it may be considered an unlawful securities offering. ● **Geographic Restrictions**: Some jurisdictions may restrict or prohibit participation in such offerings, particularly for retail investors. ● **Sanctions Violations**: If GRASS, the GRASS Protocol, or any GRASS Protocol User is deemed to have violated applicable economic or trade sanctions, this could have an adverse impact on GRASS, the GRASS Protocol, GRASS Protocol Users, and the GRASS Tokens, including by exposing them to reputational harm and damages, such as fines, imprisonment, disgorgement of profits, injunctions, and debarment, as well as other potential harmful measures. This could make the continued operation of the GRASS Protocol not viable or that could otherwise adversely impact the utilisation and liquidity of the GRASS Tokens. **2. Offer Attractiveness** The GRASS Protocol requires that GRASS Protocol Users be actively engaged with the GRASS Protocol in order for the Grass Protocol to function properly. The GRASS Protocol and GRASS Tokens may not generate sufficient interest to be viable or functional (or to continue to be viable or functional) at any time. It is not possible	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		to determine or anticipate whether the GRASS Protocol or GRASS Tokens will attract sufficient interest to be viable or functional. 3. **Transparency and Disclosure Risks** ● **Lack of Security Audit**: There is no public confirmation that the GRASS smart contracts have undergone a third-party audit. ● **Limited Public Documentation**: If the project does not provide a full whitepaper, tokenomics breakdown, or legal disclosures, users may not fully understand the offering's terms or risks. 4. **Speculative Demand**: The token's price may be driven more by hype or speculation than by underlying utility or cash flows. 5. **Liquidity and Exit Risk** ● **Exchange Dependence**: While listed on certain platforms, actual trading volume and depth may vary, affecting the ability to exit positions efficiently. ● **Holding Requirements**: Some benefits (like airdrops or staking rewards) require tokens to be held for a fixed period, which may limit user flexibility. 6. **Being Deemed a General Partnership**: It may be alleged that holding GRASS Tokens and using GRASS Tokens to participate in the governance of the GRASS Protocol constitutes the entering into of a general partnership or unincorporated	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		association between and among the GRASS Protocol Users. If this is alleged or determined, holders of GRASS Tokens could be held responsible and liable for the actions and omissions of the other members of the general partnership, unincorporated association, or the Grass Protocol itself. Such liability may be unlimited with respect to those acts omissions. This could make the continued operation of the GRASS Protocol not viable or that could otherwise adversely impact the utilisation and liquidity of the GRASS Tokens.	
I.2	Issuer-related risks	1. **Token Allocation and Control** • **Issuer Retention**: Approximately 70% of the total supply is retained by the issuer. Despite public vesting schedules, this poses a risk of sudden market impact if large portions are sold or used unexpectedly. 2. **Lack of Legal Clarity** • **Corporate Entity Uncertainty**: If the issuer's legal entity is not clearly disclosed, it can be difficult to hold them accountable for mismanagement, breach of terms, or regulatory violations. • **Jurisdictional Ambiguity**: Without knowing where the issuer is legally based, it's hard to assess the legal protections or recourse options available to token holders.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		3. Strategic Misalignment ● **Conflicts of Interest**: The issuer may have incentives (e.g., partnerships, internal liquidity targets, speculative positioning) that diverge from those of long-term token holders. ● **Token Utility Shifts**: If the issuer decides to alter the token's purpose, governance scope, or in-app functionality, holders could be adversely affected without meaningful recourse. **4. Operational Transparency** ● **No Public Audit Trail**: A lack of published financials, smart contract audits, or treasury reporting makes it difficult to assess how funds are managed or whether promises are being kept. ● **Limited Community Communication**: If the issuer rarely engages with the community or provides vague, infrequent updates, it erodes trust and can signal weak operational governance. **5. Dependency on Key Individuals** ● **Founder/Team Risk**: If the project is heavily reliant on a few individuals, any departures or misconduct could destabilise the token's development or reputation. ● **Undisclosed Team Structure**: Without clear information on who is running the project or their	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		qualifications, it's difficult to assess execution capability.	
I.3	Crypto-assets-related risks	The offering and subsequent trading of GRASS tokens carry inherent risks commonly associated with crypto-asset markets, including high volatility, liquidity issues, and regulatory uncertainty. These risks include: 1. **Custody and Wallet Risks Security of User Wallets:** Users must secure their private keys and wallets; any compromise can lead to theft of GRASS tokens. 2. **Loss of Private Keys**: If users store tokens in self-custody wallets and lose their private keys, those assets are irrecoverable. 3. **Irreversible Transactions.** The use of Blockchain Technologies creates public records that are very difficult to change. If a transaction is completed in error or as a result of fraud or theft, it would be very difficult, and potentially impossible, to reverse the transaction. GRASS is unable to replace GRASS Tokens that are lost or stolen as a result of error, theft, or fraud, and there will be no recourse against GRASS for reimbursement or replacement of such GRASS Tokens. GRASS's inability to reverse transactions or remediate the harm caused could also undermine the reputation of the GRASS Protocol and GRASS Tokens. 4. **Viability of Grass Tokens.** There is no assurance that the GRASS Tokens will	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		function as intended, including as described on any website or communication, or that you will be able to use the GRASS Tokens in any particular way. 5. **Security Breaches and Malicious Actions.** Third parties may engage in activities aimed at undermining, manipulating, or exploiting the GRASS Protocol, GRASS Protocol Users, or GRASS Tokens, including through security breaches, cybersecurity attacks, malware attacks, slashing attacks, sybil attacks, denial-of-service attacks, smurfing and spoofing, governance attacks (e.g., vote buying, flash loans, quorum manipulation, reentrancy, and proposal exploitation) or other methods of exploitation. There is no guarantee that any cybersecurity or governance measures can prevent the malicious actions of third parties. GRASS Tokens that are custodied by third parties, including in digital wallets may also be subject to security breach and other malicious actions. In addition, if access to the wallet is compromised, this could result in the theft or loss of all of your GRASS Tokens (and any other digital assets that you hold in the wallet). 6. **Fraudulent Digital Assets.** Any person is able to create digital assets, including fraudulent versions of existing digital assets and digital assets that falsely claim to represent or be associated with certain projects, persons, or entities. Users accept the risk that users and	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		third parties may mistakenly claim or receive digital assets that are fraudulent representations of the GRASS Tokens. GRASS is not responsible and will not be liable for any Losses that users and third parties experience as a result of claiming or receipt of any fraudulent or fake Grass Tokens from a third party, including any claiming or receipt that occurs at the same time as a legitimate Airdrop operated by GRASS as part of the GRASS Airdrop Program. 7. **New Laws and Regulations.** The regulatory frameworks governing digital assets continue to develop worldwide and the GRASS Protocol and GRASS Tokens are or may become subject to regulatory frameworks that could adversely impact users, the Grass Protocol, and the GRASS Tokens. In addition, existing laws may change and Grass, the Grass Protocol, and the Grass Tokens may become subject to those new laws. To the extent that any new laws impose restrictions on the GRASS Protocol or the GRASS Tokens, this could adversely affect the adoption of the GRASS Protocol and the availability and liquidity of the Grass Tokens. 8. **Grass Tokens Being Defined as Securities.** Certain regulators and governmental agencies and authorities have taken and may take the position that digital assets constitute “securities” or “investment contracts” under applicable securities laws. The determination of whether a digital asset	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		is a “security” or “investment contract” is a complicated legal test and considers a number of factors. Courts, regulators, and governmental authorities have provided little and inconsistent guidance on the application of these tests and whether digital assets constitute “securities”, “investment contracts”, or other types of regulated financial instruments. Various jurisdictions may also take different approaches in categorising digital assets under applicable laws. The classification of the GRASS Token as a “security”, “investment contract”, or other regulated financial instrument could have significant and wide-ranging implications for the regulatory obligations that may be imposed on GRASS, the GRASS Protocol, the GRASS Protocol Users, and the GRASS Tokens, including obligations that may make the continued operation of the Grass Protocol not viable or that could otherwise adversely impact the utilisation and liquidity of the GRASS Tokens. **9. Third Party Legal Activity.** The Grass Protocol and GRASS Tokens may be exploited to facilitate illegal activity including fraud, money laundering, gambling, tax evasion, sanctions evasion, and scams. If any third party uses the Grass Protocol or GRASS Tokens to further such illegal activities, that and the legal and regulatory consequences of those activities could negatively impact the development, growth, and utilisation of the Grass	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Protocol or GRASS Tokens. **10. Token Design and Inflation Risk** ● Fixed Supply Misinterpretation: While GRASS has a capped supply, how and when tokens are released into circulation (e.g., from the issuer's reserves) can still impact price dynamics. ● Unclear Token Utility: If the token has limited use cases or weak demand drivers, it may be vulnerable to long-term depreciation regardless of market trends.	
I.4	Project implementation-related risks	There is no formally published whitepaper, or technical implementation plan for the GRASS token. Accordingly future development or feature integrations remain speculative and dependent on the private interests of the issuing entities and users.	Free alphanumerical text
I.5	Technology-related risks	**1. Use of Smart Contracts and the Grass Protocol.** The GRASS Tokens are designed to be used on a protocol comprised of self-executing smart contracts which are run by users of the network on which the GRASS Protocol is based. The use of smart contracts and related programs may expose to substantial risks as the smart contracts deployed as part of the GRASS Protocol do not rely on a central party and could be subject to any of the following deficiencies that could undermine the proper functioning of the GRASS Protocol and the utility of the GRASS Tokens:	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		○ **Lack of Control of Protocol.** The GRASS Protocol will be collectively controlled and governed by the community of GRASS Token holders (the "**Grass Protocol Users**") and Grass is not able to control the actions or decisions of the GRASS Protocol Users. Any changes to the GRASS Protocol (including underlying smart contracts and security features) may need to be adopted by GRASS Protocol Users on behalf of the Grass Protocol. The GRASS Protocol Users may make decisions and take actions (or fail to make decisions or take actions) that could be to your detriment or that adversely affect the GRASS Protocol, GRASS Protocol Users, or GRASS Tokens. The GRASS Protocol Users may also make decisions that prevent the GRASS Protocol from functioning as originally intended or communicated. ○ **Obstacles to Fixing of Flaws.** If flawed smart contracts (including in the underlying code or programming languages) are deployed it may be difficult or impossible to fix the issue. Flaws may include a vulnerability from language	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		complexity, bugs, or unanticipated limitations of functionality or reliability. Such flaws may be difficult or impossible to fix without deploying a new smart contract or incorporating other mechanisms that may be complex and costly. There is no guarantee that a flaw can be remedied. In addition, it may not be possible to reverse adverse consequences of a flaw, which may include the loss of your GRASS Tokens or other digital assets. Unverified Contract Code. If the smart contract code is not publicly verified or audited by reputable security firms, it increases the risk that hidden flaws or backdoors exist. 2. **New Technologies.** New technologies may be introduced into the GRASS Protocol and the GRASS Tokens that are untested. There is no guarantee that such new technologies will function as intended. GRASS may not have control over smart contract upgrades or administrative actions required to execute those upgrades, as it will not be able to control the decisions of the GRASS Protocol Users or the implementation of those decisions. It is also possible that upgrades may include security flaws that are not easily remedied. It is impossible to predict what new technologies may be developed and the impact these	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		technologies may have on the GRASS Protocol or the GRASS Tokens. 3. **Reliance on Solana.** The GRASS Protocol is deployed on Solana and any vulnerabilities, bugs, flaws, errors, outages, or other disruptions of Solana could, directly or indirectly, adversely impact the GRASS Protocol and the GRASS Tokens. In addition, changes to the Solana Virtual Machine (SVM) or changes to technical implementations or other mechanisms could lead to the disruption or vulnerability of the GRASS Protocol, including a decrease in functionality and increase in latency. In the event of a significant change to Solana, the SVM, or related technical implementations or other mechanisms could adversely impact the continued operation of the GRASS Protocol. 4. **Interoperability and Integration Risks** Issues may arise when interacting with different wallets, exchanges, or decentralised applications if compatibility is incomplete or broken.	
I.6	Mitigation measures	As of now, GRASS has not publicly disclosed specific mitigation measures addressing the risks it faced.	Free alphanumerical text
Part J – Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts			

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
J.1	Adverse impacts on climate and other environment- related adverse impacts	**Low Environmental Impact (PoS-Based)** GRASS tokens operate on Proof of Stake (PoS) chains like Ethereum and BNB Chain, resulting in significantly lower energy usage compared to Proof of Work (PoW) blockchains. **Proof of Green (PoG) Consensus Mechanism** GRASS introduces a **Proof of Green** system that rewards users for supporting green initiatives, such as reforestation, wildlife conservation, and carbon offset projects. A portion of transaction fees is allocated towards these environmental causes, incentivising eco-friendly practices among users. **Token Burn Mechanism** A deflationary model is employed where a portion of every transaction is burned, reducing the overall token supply over time. This mechanism not only incentivises holding but also contributes to the token's long-term sustainability and value proposition.	Free alphanumerical text