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

Orchid Protocol (OXT) 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

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01	Date of notification	2025–[XX]–[XX]	YYYY-MM-DD
02	Statement in accordance with Article 6(3) of Regulation (EU) 2023/1114	Regarding offerors: This crypto-asset white paper has not been approved by any competent authority in any Member State of the European Union. The operator of the trading platform of the crypto-asset is solely responsible for the content of this crypto-asset white paper.	Predefined alphanumerical text
03	Compliance statement in accordance with Article 6(6) of Regulation (EU) 2023/1114	This crypto-asset white paper complies with Title II of Regulation (EU) 2023/1114 of the European Parliament and of the Council and, to the best of the knowledge of the 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

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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		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.	
08	Characteristics of the crypto-asset	Orchid Token ("**OXT**") 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	OXT tokens are offered to the public as utility tokens to be used within the Orchid network for purchasing bandwidth and privacy services from participating node operators. The offer does not set a fixed minimum or maximum subscription goal, as OXT is already in circulation and available for purchase on various trading platforms. The issue price of OXT is determined by prevailing market conditions at the time of purchase and may fluctuate based on supply and demand. No subscription fees are imposed by the Orchid project itself; however, purchasers may incur transaction fees associated with the Ethereum blockchain or fees charged by third-party trading platforms or service providers. The total number of OXT tokens is fixed at one billion (1,000,000,000) units, with no further issuance planned. OXT tokens are available for purchase on a continuous basis through participating exchanges and trading platforms, and there is no defined subscription period or early purchase discount offered by the Orchid project. Any discounts or incentives for early purchasers would be determined by third-party	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		platforms and are not managed or guaranteed by Orchid Labs or the Orchid network. OXT tokens may be acquired directly from other holders or through crypto-asset service providers (CASPs) and trading platforms that support OXT. The form of placement is typically without a firm commitment basis, as OXT is not distributed through a centralised public sale or initial offering managed by Orchid Labs. For admission to trading, OXT is listed on multiple regulated and unregulated trading platforms, and the specific platforms and access methods may vary over time.	
Part A - Information about the offeror or the person seeking admission to trading			
A.1	Name	Orchid Labs, Inc.	Free alphanumerical text
A.2	Legal form	Corporation	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	300 Broadway Ste 16 San Francisco, CA, 94133-4530 United States	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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
			(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	Information not publicly available	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	Founders: Steven Waterhouse Jay Freeman Gustav Simonsson Brian Fox	Free alphanumerical text presented in a tabular format
A.13	Business activity	Development and operation of decentralised VPN/proxy network	Free alphanumerical text
A.14	Parent company business activity	Orchid Labs develops and maintains the Orchid Network, a decentralised, open-source marketplace for bandwidth and other internet services, powered by a blockchain and OXT tokens. Its core product is a decentralised VPN that uses a probabilistic micropayment system to connect users with providers, offering them a more private and resilient internet experience free from surveillance and censorship.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
A.15	Newly established	true	‘true’ – Yes ‘false’ – No
A.16	Financial condition for the past three years	Information not publicly available. Issuer only provides information regarding its expenditures. 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	Not applicable 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	Free alphanumerical text

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

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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		(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	
C.12	Parent company business activity	Revolut Digital Assets Europe Ltd is a wholly-owned subsidiary of Revolut Group Holdings Ltd, a private company limited by shares registered in England and Wales (company number: 12743269)	Free alphanumerical text
C.13	Other persons drawing up the crypto-asset white paper according to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114	Not applicable	Free alphanumerical text
C.14	Reason for drawing the white paper by persons referred to in Article 6(1), second subparagraph, of Regulation (EU) 2023/1114	Not applicable	Free alphanumerical text
Part D- Information about the crypto-asset project			
D.1	Crypto-asset project name	Orchid Protocol	Free alphanumerical text
D.2	Crypto-assets name	Orchid Token	Free alphanumerical text
D.3	Abbreviation	OXT	Free alphanumerical text
D.4	Crypto-asset project description	The Orchid crypto-asset project is a decentralised marketplace designed to provide secure, anonymous, and censorship-resistant internet access through a global network of	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		bandwidth providers. Users can purchase bandwidth from multiple independent node operators, constructing single or multi-hop onion-routed circuits for enhanced privacy. The project leverages the Ethereum blockchain to register node providers, manage staking, and facilitate probabilistic nanopayments for bandwidth usage. Orchid's core objective is to empower individuals to control their network activity without fear of surveillance or censorship. The system is built to be scalable, decentralised, and user-friendly, with automated node selection and payment processes. Bandwidth providers stake Orchid Tokens (OXT) to advertise their services and receive traffic in proportion to their stake, aligning incentives and mitigating risks such as Sybil attacks. The platform supports a competitive bandwidth market, allowing supply to scale with user demand. Orchid's architecture is modular and extensible, enabling future enhancements in privacy, usability, and security. The project is open source and aims to serve a global user base, with a particular focus on regions where internet freedom is restricted.	
D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project	Steven Waterhouse Jay Freeman Gustav Simonsson Brian Fox	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	Key features of the OXT token include:	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
	Token Projects	● Decentralised bandwidth marketplace for purchasing internet access ● Multi-hop onion routing for enhanced privacy and anonymity ● Bandwidth provided by independent node operators globally ● Real-time, scalable payments using probabilistic nanopayments on Ethereum ● Staking mechanism with Orchid Tokens (OXT) to align incentives and ensure service quality ● Automated node selection based on stake, price, location, and other criteria ● Open source client and server software for broad accessibility and transparency ● Modular architecture allowing for future enhancements and custom services ● User-controlled budgeting and spending for bandwidth purchases ● Designed to resist censorship and surveillance, supporting internet freedom worldwide	
D.8	Plan for the token	The OXT token was launched on 17 December 2019. Since launching Orchid in 2019, the network has made tremendous strides. It became faster, easier to use, and many partners were added to it. And currently, Orchid Labs continues to develop and contribute to this protocol. Unfortunately, there is no project roadmap on the official Orchid website. Below are a few key	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		points in its development: ● In October 2019, the platform announced on its Blog their intention to use nano-payments that the customer can turn on and off at any time. ● In January 2020, the company notified users of the new partnership. PIA (Private Internet Access) has become a key partner in protecting online privacy and freedom. By using OXT, customers can pay for byte-by-byte private bandwidth through the PIA. ● In February 2020, Orchid Labs began partnering with BolehVPN. ● In August 2020, the Orchid's token (OXT) was fully integrated with Uphold, a multi-asset trading platform that allows people to buy, sell, and exchange a variety of assets, including fiat currencies, precious metals, and cryptocurrencies. Thus, people can now deposit and withdraw OXT through Uphold to external wallets, as well as buy, store and send on the platform. ● In September 2020, Orchid expanded its partnership with Chainlink, a network of decentralised oracles, by introducing a new tool that makes it easier for Orchid users to quantify VPN bandwidth costs. ● In July 2020, Orchid announced that users could earn OXT by participating in the new CoinList Rewards programme. CoinList has created educational content. Thus, customers can learn more about Orchid & OXT, then complete several tasks (such as interacting with smart contracts) and receive $5 in OXT as a	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		reward.	
D.9	Resource allocation	The total supply of Orchid Tokens (OXT) is fixed at 1,000,000,000 (one billion) units, with no inflation. The OXT token was initially allocated across multiple categories, allocated as follows: ● Private Sale (58%): 580 million OXT tokens were sold to accredited investors and strategic partners. ● Team and Founders (20%): 200 million OXT tokens were allocated to the founders and team, subject to vesting periods. ● Network Development (17%): 170 million OXT tokens were reserved for future development of the Orchid ecosystem. ● Community and Partners (5%): 50 million OXT tokens were allocated for community initiatives, partnerships, and marketing efforts. The distribution was designed to ensure long-term development while providing immediate utility for the network.	Free alphanumerical text
D.10	Planned use of collected funds or crypto-assets	Of the 1,000,000 (one billion) units of OXT, 997,214,634 coins are circulating. The max supply is not available.	Free alphanumerical text
Part E - Information about the offer to the public of crypto-assets or their admission to trading			
E.1	Public offering or admission to trading	ATTR	'OTPC' - offer to the public 'ATTR' - admission to trading

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.2	Reasons for public offer or admission to trading	Orchid Protocol did not provide any information regarding the reasons for the admission to trading of the OXT tokens. However, it can be reasonability inferred from publicly available information, that Orchid Protocol offered its tokens for the following reasons: ● **Visibility and Credibility** Trading facilitates price discovery through open interaction between buyers and sellers. ● **Liquidity** Trading enables the token to be easily traded, providing immediate liquidity for holders. It also facilitates price discovery through open interaction between buyers and sellers. ● **Community Growth** Trading broadens the user base by allowing wider public participation. This phenomenon stimulates network effects and supports the adoption of the ecosystem.	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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.7	Oversubscription allocation	Not applicable	Free alphanumerical text
E.8	Issue price	0	Amount in monetary value{DECIMAL-18/3} Or Numerical {INTEGER-n}
E.9	Official currency or any other crypto-assets determining the issue price	Not applicable	{CURRENCYCODE_3} or {DTI}
E.10	Subscription fee	0	Amount in monetary value {DECIMAL-18/3} Or Numerical {INTEGER-n}
E.11	Offer price determination method	The price is now determined through demand and supply.	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	There are currently no formal restrictions on who may hold or trade OXT 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 are able to be reimbursed if the minimum target subscription goal is not reached at the end of the offer to the	Predefined alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		public, if they exercise the right to withdrawal provided for in Article 13 of Regulation (EU) 2023/1114. Not applicable	
E.16	Refund mechanism	Not applicable	Free alphanumerical text
E.17	Refund timeline	Not applicable	Free alphanumerical text
E.18	Offer phases	Not applicable	Free alphanumerical text
E.19	Early purchase discount	Not applicable	Free alphanumerical text
E.20	Time-limited offer	false	'true'- Yes 'false' – No
E.21	Subscription period beginning	Not applicable	ISO 8601 date format (YYYY-MM-DD)
E.22	Subscription period end	Not applicable	ISO 8601 date format (YYYY-MM-DD)
E.23	Safeguarding arrangements for offered funds/crypto- Assets	Not applicable	Free alphanumerical text
E.24	Payment methods for crypto-asset purchase	**1. Centralised Exchanges (CEXs)** ● **Credit/Debit Cards:** Certain platforms may allow users to purchase OXT tokens directly with credit or debit cards. ● **Bank Transfers:** Certain exchanges support bank transfers, by linking the bank account to the platform, selecting OXT and confirming the transaction. ● **Third-Party Payment Services:** Certain payment providers are	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		sometimes integrated with exchanges to facilitate purchases through various local payment options. ● **Peer-to-Peer (P2P) Trading:** Certain exchanges offer P2P trading, where users can buy OXT 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 OXT 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 OXT tokens through card payments, bank transfers, and other local payment methods.	
E.25	Value transfer methods for reimbursement	Not applicable	Free alphanumerical text
E.26	Right of withdrawal	Not applicable	Free alphanumerical text
E.27	Transfer of purchased crypto-assets	**1. Access Wallet or Exchange Account** ● **Centralised exchange:** Log in to your account. ● **Personal wallet:** Open your non-custodial wallet that holds your OXT tokens.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		2. Navigate to the 'Withdraw' or 'Send' Section ● On exchanges, go to the "Withdraw" or "Assets" page. ● On personal wallets, select the OXT 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 OXT 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 OXT tokens you wish to transfer. ● Some platforms may require a minimum transfer amount. **5. Select the Network (if applicable)** ● If your OXT 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.	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		7. Pay the Network Fee Blockchain transactions require a network fee (gas fee), paid in the native currency of the chosen network. **8. Wait for Confirmation** The transaction will be processed and broadcast to the blockchain.	
E.28	Transfer time schedule	No fixed time schedule. The transfer time is primarily determined by the network congestion on the Ethereum blockchain, as OXT is an ERC-20 token.	ISO 8601 date format (YYYY-MM-DD)
E.29	Purchaser's technical requirements	To participate in the acquisition and management of OXT tokens, purchasers must meet the following technical requirements. **1. Wallet requirements** To begin using OXT, the first step is to connect to a wallet. Before interacting, users should review OXT's contractual and protocol documentation. Once connected, users gain full access to OXT via compatible interfaces. **2. Network Connectivity** A stable internet connection is required to maintain wallet connectivity, submit transactions, and interact with network without interruption.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		3. Access to Supported Exchanges ● OXT tokens are listed on several Centralised and Decentralised Exchanges ● Accounts and Verifications To trade or provide liquidity, users typically need accounts on these platforms. Some centralised exchanges require KYC/AML verification for deposits, withdrawals, or trading.	
E.30	Crypto-asset service provider (CASP) name	Revolut Digital Assets Europe Ltd.	Free alphanumerical text
E.31	CASP identifier	549300ET4IUR6RCZOL84	{LEI}
E.32	Placement form	NTAV	'WITH- with a firm commitment basis 'WOUT' - without a firm commitment basis 'NTAV' - Not applicable
E.33	Trading platforms name	Revolut Digital Assets Europe Ltd.	Free alphanumerical text
E.34	Trading platforms Market identifier code (MIC)	Not applicable	{MIC}
E.35	Trading platforms access	Investors can access trading platforms where OXT 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	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></td><td></td><td>search for the OXT 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.</td><td></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>0.10%–0.26% per trade</td></tr>
<tr><td></td><td>Withdrawal Fee</td><td>~ 63 OXT or $4.79 or platform-specific</td></tr>
<tr><td>Decentralised Exchange (DEX)</td><td>Swap Fee</td><td>~0.1%</td></tr>
<tr><td></td><td>Gas Fee</td><td>Not publicly available.</td></tr>
<tr><td>Fiat On-Ramp</td><td>Service/Processing Fee</td><td>1.49%–3.75%</td></tr>
</table></td><td>Free alphanumerical text</td></tr>
<tr><td>E.37</td><td>Offer expenses</td><td>Not applicable</td><td>Free alphanumerical text and Amount in monetary value {DECIMAL-18/3}</td></tr>
<tr><td>E.38</td><td>Conflicts of interest</td><td>There are no known conflicts of interest.</td><td>Free alphanumerical text</td></tr>
<tr><td>E.39</td><td>Applicable law</td><td>Information not publicly available.</td><td>Drop-down list of applicable laws</td></tr>
<tr><td>E.40</td><td>Competent court</td><td>Information not publicly available.</td><td>Drop-down list of applicable laws</td></tr>
<tr><td colspan="4">Part F - Information about the crypto-assets</td></tr>
<tr><td>F.1</td><td>Crypto-asset type</td><td>Utility token</td><td>Free alphanumerical text</td></tr>
</table>

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
F.2	Crypto-asset functionality	See D.8	Free alphanumerical text
F.3	Planned application of functionalities	See D.8. Timelines subject to change and development times.	Free alphanumerical text
A description of the characteristics of the crypto-asset, including the data necessary for classification of the crypto-asset white paper in the register referred to in Article 109 of Regulation (EU) 2023/1114, as specified in accordance with paragraph 8 of that Article			
F.4	Type of crypto-asset white paper	OTHR	OTHR
F.5	The type of submission	NEWT	NEWT = New MODI = Modify EROR = Error CORR = Correction
F.6	Crypto-asset characteristics	Total supply of 1,000,000,000 OXT 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.orchid.com/	Free alphanumerical text
F.9	Starting date of offer to the public or admission to trading	2019-12-17	YYYY-MM-DD
F.10	Publication date	2025-[XX]-[XX]	YYYY-MM-DD
F.11	Any other services provided by the issuer	Not applicable	Free alphanumerical text
F.12	Language or languages of the crypto-asset white paper	English	Closed list of EU languages

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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	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	This information is not publicly disclosed.	Free alphanumerical text
G.2	Exercise of rights and obligations	This information is not publicly disclosed	Free alphanumerical text
G.3	Conditions for modifications of rights and obligations	This information is not publicly disclosed	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
G.4	Future public offers	This information is not publicly disclosed	Free alphanumerical text
G.5	Issuer retained crypto-assets	400,579,272	Numerical {INTEGER-n}
G.6	Utility token classification	true	'true' – Yes 'false' – No
G.7	Key features of goods/services of utility tokens	See D.7.	Free alphanumerical text
G.8	Utility tokens redemption	Not applicable	Free alphanumerical text
G.9	Non-trading request	false	'true' – sought 'false' – not sought
G.10	Crypto-assets purchase or sale modalities	OXT tokens can be bought and sold through both centralised exchanges (CEXs) and decentralised exchanges (DEXs). Common trading pairs include OXT /USDT and OXT /USD, though availability may vary by platform and region.	Free alphanumerical text
G.11	Crypto-assets transfer restrictions	OXT does not disclose any information regarding OXT's transfer restrictions. However, it can be reasonably inferred that the following restrictions apply: **Geographic Limitations** Some platforms restrict access to residents of certain countries due to local regulations. **Exchange-Imposed Restrictions** When using centralised platforms, transfers of OXT 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	There are no supply adjustment mechanisms for Orchid (OXT) tokens at the protocol level. The total supply of OXT is fixed according to the token's issuance schedule, and there are no built-in features such as automatic burning, minting, or algorithmic supply changes.	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 applicable	Free alphanumerical text
G.18	Applicable law	Not publicly available information	Drop-down list of applicable laws
G.19	Competent court	Not publicly available information	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
Part H – information on the underlying technology			
H.1	Distributed ledger technology (DTL)	Distributed Ledger Technology (DLT) refers to a decentralised digital infrastructure used for recording transactions across multiple locations simultaneously. Unlike traditional, centralised databases, DLT systems operate without a central authority, relying instead on a network of independent nodes, each maintaining a synchronised copy of the ledger. Transactions are validated through consensus mechanisms, promoting transparency, security, and resistance to tampering. One of the most widely adopted forms of DLT is blockchain, which consists of sequentially linked blocks containing timestamped transaction data. Each block is cryptographically connected to the previous one, making it virtually immutable and resistant to retroactive alteration. Blockchains can also support smart contracts, self-executing agreements that automate 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.	Free alphanumerical text
H.2	Protocols and technical standards	OXT uses the ERC20 token standard on the Ethereum blockchain. The Orchid protocol	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		relies on Ethereum smart contracts (written in Solidity) for staking, node registration, and payment settlement. Off-chain nanopayment protocols are used for scalable, high-frequency payments. Network transport is handled via the WebRTC protocol, and the Ethereum JSON-RPC API is used for blockchain interactions.	
H.3	Technology used	Orchid employs a decentralised, stake-weighted node selection mechanism and maintains a public node directory and metadata registry on the Ethereum blockchain. The protocol enforces a withdrawal delay for staked OXT to enhance security. Additional features include on-chain whitelisting, customizable client parameters for node selection, and a modular architecture for scalability and extensibility.	Free alphanumerical text
H.4	Consensus mechanism	OXT relies on the Ethereum blockchain's Proof-of-Stake (PoS) consensus mechanism for transaction validation, smart contract execution, and network security. Orchid does not implement a separate consensus protocol; all consensus-related operations are handled by Ethereum.	Free alphanumerical text
H.5	Incentive mechanisms and applicable fees	**Staking for Provider Selection** - Bandwidth providers stake OXT to register themselves in a decentralised provider directory. - Selection probability is proportional to the amount of OXT staked—this is what gives providers an incentive to stake more. - This creates a market dynamic: providers compete to offer high-quality	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		service and attract user traffic. **Probabilistic Nanopayments** - Users don’t pay in a continuous stream. Instead, they send lottery-style tickets, each representing a small chance at receiving a full payment. - Over time, the average payout equals the cost of bandwidth consumed. - This system avoids high Ethereum gas costs and makes microtransactions scalable. As of today, the minimum per-transaction fee is 0.00001 OXT. **No Monthly Subscription Fees** - Users fund their own Orchid accounts with OXT and spend only what they use—aligning payment with actual consumption. - This is a key user-side incentive for adoption.	
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	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		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.	
H.8	Audit	true	‘true’ – Yes ‘false’ – No
H.9	Audit outcome	OXT has undergone multiple security audits by various partners. - ConsenSys Diligence performed a security audit of several key contracts related to the Orchid directory and staking logic. The audit uncovered issues of varying severity, including critical and medium-level vulnerabilities, many of which were addressed in subsequent iterations. The audit also assessed architecture, code quality, and test coverage. - ConsenSys audited the BitwaveMultiSend.sol contract, which facilitates batch transfers of ETH and ERC-20 tokens — a key component of Orchid’s token distribution process (e.g., handling batch disbursements of OXT to buyers). - A follow-up audit by ConsenSys reviewed an updated version of the multisend/batch transfer contract. This review included automated tooling (like MythX) and found no major security issues.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
Part I – Information on risks			
I.1	Offer-related risks	OXT did not explicitly disclose any offer-related risks. However, several potential risks emerged: **Volatility** The price of OXT tokens can be highly volatile, subject to significant fluctuations driven by shifts in market sentiment, broader economic conditions, or new developments related to the token itself. OXT could lose significant value relative to fiat currency or other digital currencies. **Liquidity** Liquidity for OXT tokens may differ across centralised exchanges (CEXs) and decentralised exchange (DEXs). In periods of heightened market volatility or stress, liquidity may decrease, potentially restricting users' ability to buy or sell OXT tokens at desired prices. **Regulatory** Ongoing changes in global regulations regarding crypto-assets and blockchain technologies may impact the trading, utility, or listing status of the OXT token in various jurisdictions.	Free alphanumerical text
I.2	Issuer-related risks	OXT did not provide disclosure of any issuer-related risks. Nevertheless, the following risks have arisen:	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Reputation The growth and overall perception of OXT in the market are significantly influenced by its reputation. **Regulatory Exposure** OXT operates within a dynamic and evolving regulatory landscape. Changes in regulations, new legal requirements, or enforcement actions related to crypto-assets and decentralised technologies could affect the token's accessibility, its ability to be listed on exchanges, and its legal standing in different jurisdictions. Such developments may limit the token's adoption and use.	
I.3	Crypto-assets-related risks	Orchid did not disclose any risks specifically related to crypto-assets. However, the general risks associated with crypto assets are the following:	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Speculative Nature The value of OXT tokens is highly speculative and can experience considerable price volatility. Various factors (user adoption, market demand, liquidity, economic crisis, regulatory changes) can contribute to swift and significant changes in the token's price. **Security** Token holders are fully responsible for securing their private keys, wallet passwords, and recovery phrases. Loss or compromise of these keys can result in permanent loss of access to their tokens. **Risky Investment** There is a risk that users may lose some or all of tokens because of market volatility, security breaches, or loss of private keys. Digital asset investments can result in partial or total financial loss.	
I.4	Project implementation-related risks	Orchid did not disclose any risks specifically related to project implementation. However, the following risks have been identified: **Technical Limitations** The development and deployment of OXT's platform features may encounter technical challenges, security vulnerabilities, or delays. Limited development resources or unforeseen complexities could impact the timely delivery and reliability of these functionalities. **Regulatory Developments** Increasing regulatory scrutiny on blockchain projects platforms may lead to new compliance obligations or restrictions affecting OXT. Such	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		developments could constrain token usage, governance participation, or limit access on certain exchanges or jurisdictions. **Third-Party Reliance** OXT depends on various third-party technologies and services, including blockchain infrastructure providers, cross-chain bridges. **Competition** As a highly competitive field, the project may encounter significant competition. Orchid may have failed to gather the attention and involvement from the cryptocurrency community.	
I.5	Technology-related risks	Despite Orchid not disclosing any technology-related risks, the following risks can be identified: **Access** Users might not always be able to access their digital assets right away because of issues like network congestion, exchange limits, or technical problems. **Security Risks** OXT tokens, like all digital assets, are exposed to cybersecurity threats such as hacking and phishing. Communication on social networks, although instantaneous, creates an additional risk of fraud.	Free alphanumerical text
I.6	Mitigation measures	Orchid has not disclosed any specific information regarding its mitigation measures. Based on publicly available information, the following measures are in place: **Decentralised Governance**	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Orchid has been thoroughly audited and no critical nor high issues remained uncleared by the issuer. **Exchange Availability** OXT is largely listed on leading exchanges, enhancing access and liquidity.	
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	Orchid (OXT) operates as an ERC20 token on the Ethereum blockchain, which utilises a Proof-of-Stake (PoS) consensus mechanism. PoS significantly reduces energy consumption and greenhouse gas emissions compared to Proof-of-Work systems. Orchid's on-chain activities do not introduce additional environmental impacts beyond those inherent to Ethereum transactions. Off-chain operations, such as bandwidth provision by node operators, involve standard server infrastructure with environmental impacts comparable to other internet services. Orchid does not implement any resource-intensive mining or consensus processes of its own. The protocol is designed for efficiency and sustainability, and future developments will continue to prioritise minimizing adverse environmental impacts.	Free alphanumerical text