

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

XAN (XAN) 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.

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No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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01	Date of notification	2026-[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
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

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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 alphanumeric 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 alphanumeric 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. 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 alphanumeric text

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08	Characteristics of the crypto-asset	The XAN ("XAN") token is a utility token as defined by Article 3(1)(9) of Regulation (EU) 2023/1114 of the European Parliament and Council of 31 May 2023 on markets in crypto-assets ("MiCA").	Free alphanumerical text
09		Not applicable.	Free alphanumerical text
10	Key information about the offer to the public or admission to trading	https://www.coingecko.com/fr/coins/anoma As of 2026-02-24, are circulating 2,500,000,000 tokens on a total/maximum supply of 10,000,000,000 tokens.	Free alphanumerical text
<i>Part A - Information about the offeror or the person seeking admission to trading</i>			
A.1	Name	MODULAR IT CONSULTING LTD.	Free alphanumerical text
A.2	Legal form	Limited Company under the Laws of the British Virgin Islands	ISO standard 20275 'Financial Services – Entity Legal Forms (ELF)'
A.3	Registered address	Jayla Place, 2nd Floor, Road Town, Tortola, British Virgin Islands	ISO standard 3166-1 alpha 2 country codes and codes for their subdivisions and Free alphanumerical text
A.4	Head office	Not applicable	ISO standard 3166-1 alpha 2 country codes and codes for their subdivisions and Free alphanumerical text
A.5	Registration date	2024-10-15	ISO 8601 date format (YYYY-MM-DD)
A.6	Legal entity identifier	Not applicable.	{LEI}
A.7	Another identifier required pursuant to	BVI Registration Number: 2160156	Free text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
	applicable national law		
A.8	Contact telephone number	+1 3453251367	Free alphanumerical text
A.9	E-mail address	info@modularity.cx	Free alphanumerical text
A.10	Response time (Days)	Within up to 30 calendar days, depending on the time of year and the complexity of the request.	{DURATION}
A.11	Parent company	Modular Foundation is the sole shareholder. Form: foundation company limited by guarantee without any share capital, under the laws of the Cayman Islands. Registered office: c/o International Corporation Services Ltd, Harbour Place, 2nd Floor, 103 South Church Street, P.O. Box 472, Grand Cayman KY1-1106, Cayman Islands.	Free alphanumerical text
A.12	Members of the management body	Modular Foundation is the sole director.	Free alphanumerical text presented in a tabular format
A.13	Business activity	The Person Seeking Admission to Trading is a general-purpose entity as allowed under the laws of the British Virgin Islands, established to support the activities and initiatives of its Parent Company. The Person Seeking Admission to Trading thus has general corporate capacity, unrestricted by a defined corporate purpose.	Free alphanumerical text
A.14	Parent company business activity	Modular Foundation operates in the Web3 space, offering independent, multifaceted support to relevant networks to help expand their ecosystems. Its initiatives may include acting as a holding company and providing grants.	Free alphanumerical text
A.15	Newly established	true	'true' – Yes 'false' – No

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A.16	Financial condition for the past three years 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.	Not applicable.	Free alphanumerical text
A.17	Financial condition since registration Where the offeror or person seeking admission to trading has not been established for the past three years, description of its financial condition since the date of its registration. This shall be assessed based on a fair review of the development and performance of the business of the offeror or person seeking admission to trading and of its position for each year and interim period for which historical financial information is available, including the causes of material changes. The review shall be a balanced and comprehensive analysis of the development	The Person Seeking Admission to Trading was recently established under the laws of the British Virgin Islands. The Person Seeking Admission to Trading is fully owned by the Modular Foundation and benefits from its financial support, in adequacy to its current operations and business activities. As of August 2025,, the Person Seeking Admission to Trading has no material outstanding liabilities, debts, or financial commitments and does not face any financial risks or uncertainties impacting its immediate financial viability.	Free alphanumerical text

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	and performance of the business of the offeror or person seeking admission to trading and of its position, consistent with the size and complexity of the business.		
<i>Part B - Information about the issuer, if different from the offeror or person seeking admission to trading</i>			
Not applicable			
<i>Part C- Information about the operator of the trading platform in cases where it draws up the crypto-asset white paper and information about other persons drawing the crypto-asset white paper pursuant to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114</i>			
C.1	Name	Revolut Digital Assets Europe Ltd	Free alphanumeric text
C.2	Legal form	Legal entity	ISO standard 20275 'Financial Services – Entity Legal Forms (ELF)'
C.3	Registered address	Pikioni, 10 Flat/Office 5, 3075, Limassol, Cyprus	ISO standard 3166-1 alpha 2 country codes and codes for their subdivisions and Free alphanumeric text
C.4	Head office	Pikioni, 10 Flat/Office 5, 3075, Limassol, Cyprus	ISO standard 3166-1 alpha 2 country codes and codes for their subdivisions and Free alphanumeric text
C.5	Registration date	2022-08-09	ISO 8601 date format (YYYY-MM-DD)
C.6	Legal entity identifier	549300ET4IUR6RCZOL84	{LEI}

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
C.7	Another identifier required pursuant to applicable national law	Company registration number: HE430310	Free text
C.8	Parent company	Revolut Group Holdings Ltd	Free alphanumerical text
C.9	Reason for crypto-asset white paper Preparation	This crypto-asset white paper has been drawn up in accordance with the requirements of Article 4, Article 6 and Article 8 of Regulation (EU) 2023/1114.	Free alphanumerical text
C.10	Members of the Management body	Mr Costas Michael (CEO) Mr Christos Drakos (CFO) Mr Ioannis Ashiotis (NED) Mr Konstantinos Adamos (NED)	Free alphanumerical text presented in a tabular format
C.11	Operator business activity	Revolut Digital Assets Europe Ltd is a financial technology company registered as a crypto-assets services provider by the Cyprus Securities and Exchange Commission. Revolut Digital Assets Europe Ltd provides crypto-asset services across the European Union, including buying, selling, and exchange of crypto-assets. Revolut Digital Assets Europe Ltd has applied to the Cyprus Securities and Exchange Commission for a crypto-asset services provider (CASP) authorisation under Regulation (EU) 2023/1114. The authorisation is expected to cover the following crypto-asset services: • exchange of crypto-assets for funds • 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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
C.12	Parent company business activity	Revolut Digital Assets Europe Ltd is a wholly-owned subsidiary of Revolut Group Holdings Ltd, a private company limited by shares registered in England and Wales (company number: 12743269)	Free alphanumerical text
C.13	Other persons drawing up the crypto-asset white paper according to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114	Not applicable	Free alphanumerical text
C.14	Reason for drawing the white paper by persons referred to in Article 6(1), second subparagraph, of Regulation (EU) 2023/1114	Not applicable	Free alphanumerical text
<i>Part D- Information about the crypto-asset project</i>			
D.1	Crypto-asset project name	Anoma	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 Protocol does not constitute a distributed ledger in itself. Instead, it is deployed across multiple distributed ledger networks, including Ethereum and Solana, which are referred to as “Fractal Instances.” On each of these networks, an instance of the Protocol is implemented. Through this architecture, the Protocol operates as a decentralised operating system that provides a unified execution and coordination layer for Web3 applications. Applications built on the Protocol are designed to be natively compatible with all supported Fractal Instances, enabling seamless interoperability across underlying networks. The Protocol further adopts an intent-centric architecture, allowing applications to express desired	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		outcomes rather than explicit transactions. This approach enables user experiences that are closer to those of Web2 applications, while preserving the decentralised and trust-minimised properties of Web3 systems.	
D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project	List of Entities involved in development of the Ecosystem: Verabit Labs Ltd. (commercial name: Zelic), 600 South Jupiter Road, Allen, Texas 75002, United States - Security. MME Legal AG, Zollstrasse 62, 8005 Zürich, Switzerland - Legal. Knowable Inc., 196 Thames St N Ingersoll, ON N5C 3E4, Canada - Community. Informal Systems Inc., 180 John Street Toronto, Ontario M5T 1X5, Canada - Security (Audit). Heliix AG, Baarerstrasse 82, 6300 Zug, Switzerland - Software. Arktouros PLLC, 1717 N Street NW Washington, DC - District of Columbia 20036, USA - Legal.	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	Holding the Token grants access to the Protocol's on-chain governance system. Through this Governance Functionality, Token holders are entitled to participate in decision-making processes relating to Protocol upgrades and to vote on rules applicable to specific Fractal Instances. On-chain service. The governance system is fully implemented and executed on-chain. Unlike off-chain and non-binding governance tools (such as Snapshot), governance decisions within the Protocol are directly enforceable. Votes automatically result in the acceptance or rejection of proposed changes, and successful proposals are implemented at the protocol level without the need for manual or	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		discretionary intervention. Scope of the service. The Governance Functionality applies to all components of the Protocol, including the smart contracts governing Token issuance, protocol parameters, and voting mechanisms. Access to the Governance Functionality therefore provides Token holders with the ability to influence the operational state of the Protocol and the services it delivers across relevant Fractal Instances.	
D.8	Plans for the token	Not applicable.	Free alphanumerical text
D.9	Resource allocation	The resources secured through prior funding rounds have been primarily allocated to the development and implementation of the Protocol. A significant portion of these resources has been used to establish and support a multidisciplinary operational team comprising more than 40 dedicated contributors. This team includes expertise across blockchain and protocol development, Web3 community engagement, legal and compliance, marketing, and strategic partnerships. In parallel, resources have been directed towards fostering ecosystem growth. This includes initiatives aimed at incentivising user participation, supporting developer onboarding, and facilitating integrations with existing decentralised finance applications and underlying blockchain networks.	Free alphanumerical text
D.10	Planned use of collected funds or crypto-assets	Not applicable.	Free alphanumerical text
<i>Part E - Information about the offer to the public of crypto-assets or their admission to trading</i>			

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.1	Public offering or admission to trading	ATTR	'OTPC' - offer to the public 'ATTR' - admission to trading
E.2	Reasons for public offer or admission to trading	The admission of the Token to trading platforms is intended to facilitate its availability to a broad range of market participants and Protocol users. Listing on trading platforms supports the circulation of the Token and contributes to the formation of liquid secondary markets. By enabling wider access to the Token, admission to trading allows users to acquire and transfer the Token in order to participate in the Protocol and make use of the functionalities it supports, in accordance with the Protocol's design.	Free alphanumerical text
E.3	Fundraising target	Not applicable.	Amount in monetary value {DECIMAL-18/3} Or Numerical {INTEGER-n}
E.4	Minimum subscription goals	Not applicable.	Amount in monetary value {DECIMAL-18/3} or Numerical {INTEGER-n}
E.5	Maximum subscription goals	Not applicable.	Amount in monetary value {DECIMAL-18/3} or Numerical {INTEGER-n}
E.6	Oversubscription acceptance	Not applicable.	'true'- Yes 'false' – No
E.7	Oversubscription allocation	Not applicable.	Free alphanumerical text
E.8	Issue price	Not applicable.	Amount in monetary value {DECIMAL-18/3} Or

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
			Numerical {INTEGER-n}
E.9	Official currency or any other crypto-assets determining the issue price	Not applicable.	{CURRENCYCODE_3} or {DTI}
E.10	Subscription fee	Not applicable.	Amount in monetary value {DECIMAL-18/3} Or Numerical {INTEGER-n}
E.11	Offer price determination method	Not applicable.	Free alphanumerical text
E.12	Total number of offered/traded crypto-assets	10,000,000,000	Numerical {INTEGER-n}
E.13	Targeted holders	ALL	'RETL' – retail investors 'PROF' – professional investors 'ALL' – all types of investors
E.14	Holder restrictions	Ethereum, the blockchain on which the Tokens are issued, operates on a permissionless and decentralised basis. As a result, no restrictions are imposed at the blockchain protocol level on the holding or transfer of the Tokens. Trading platforms, acting in accordance with applicable laws and their own internal policies, may independently apply restrictions to persons buying or selling the Token through such platforms. Any measures implemented for this purpose, including customer due-diligence or know-your-customer (KYC) checks, are carried out by the relevant trading platforms and not by the Person Seeking Admission	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		to Trading.	
E.15	Reimbursement notice	Not applicable.	Predefined alphanumeric text
E.16	Refund mechanism	Not applicable.	Free alphanumeric text
E.17	Refund timeline	Not applicable.	Free alphanumeric text
E.18	Offer phases	Not applicable.	Free alphanumeric text
E.19	Early purchase discount	Not applicable.	Free alphanumeric text
E.20	Time-limited offer	Not applicable.	'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 alphanumeric text
E.24	Payment methods for crypto-asset purchase	When purchasing crypto-assets, the available payment methods can vary depending on the platform, the nature of the offering, and the specific project's infrastructure. 1. Centralised Exchanges (CEX) Centralised exchanges are platforms where users can buy and sell crypto-assets using a variety of payment methods. Common options include: • Bank Transfers: Many exchanges support direct bank transfers (SEPA, SWIFT, etc.), allowing users to deposit fiat currency (such as GBP, EUR, or USD) to purchase crypto-assets.	Free alphanumeric text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		• Credit/Debit Cards: Some exchanges accept major credit and debit cards for instant purchases, though fees may be higher. • Other Cryptocurrencies: Users can often trade one cryptocurrency for another. • Third-Party Payment Providers: Some platforms integrate with third-party payment service providers though this is less common. 2. Decentralised Exchanges (DEX) Decentralised exchanges operate without intermediaries and typically require users to connect a crypto wallet. Payment methods here are more limited: • Cryptocurrency Swaps: Users exchange one crypto-asset for another directly from their wallet. Stablecoins: Many DEXs support stablecoins (such as USDT, USDC, or DAI) as a medium of exchange.	
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 Your Wallet or Exchange Account • Centralised exchange: Log in to your account. • Personal wallet: Open your non-custodial wallet that holds your XAN tokens. 2. Navigate to the 'Withdraw' or 'Send' Section • On exchanges, go to the "Withdraw" or "Assets" page. • On personal wallets, select the XAN token and then tap or click "Send".	Free alphanumerical text

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		3. Enter the Recipient's Wallet Address • Copy and paste the correct wallet address of the recipient. • Double-check that the wallet supports XAN 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 XAN tokens you wish to transfer. • Some platforms may require a minimum transfer amount. 5. Select the Network (if applicable) • If your XAN tokens are available on multiple networks, make sure you select the correct network that matches the recipient's wallet. 6. Review and Confirm the Transfer • Check all details: recipient address, network, and amount. • On centralised platforms, you may need to complete 2FA verification or enter a withdrawal password. 7. Pay the Network Fee • Blockchain transactions require a network fee (gas fee), paid in the native currency of the chosen network 8. Wait for Confirmation The transaction will be processed and broadcast to the blockchain.	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.28	Transfer time schedule	The transfer of the Tokens acquired as a result of trades conducted on the Trading Platforms may or not occur immediately, depending on the functioning of the selected Trading Platform. The Person Seeking Admission to Trading has no control over the timing of such transfers.	ISO 8601 date format (YYYY-MM-DD)
E.29	Purchaser's technical requirements	Purchaser Requirements: Digital Wallet • Blockchain Compatibility: XAN tokens exist on the Ethereum blockchain. Purchasers must use a wallet that supports XAN tokens. • Wallet Setup: The wallet must be properly configured and secured with a strong password and backup recovery phrase (also known as a seed phrase). Users are responsible for safeguarding their private keys or recovery details. Gas Fees • Transaction Fees: To transfer XAN tokens, you will need to pay for transaction (gas) fees on the applicable network. • Variable Fees: Gas fees fluctuate depending on network congestion and transaction complexity. Ensure you have sufficient funds in your wallet to successfully complete transactions. Exchange Account (if applicable) • Centralised Exchanges (CEXs): If purchasing XAN through exchanges, you	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		must create an account. KYC Verification: Most platforms require users to complete Know Your Customer (KYC) checks to comply with regulatory standards. This may include submitting identity documents and proof of address. Internet Connection A stable internet connection is essential for using crypto wallets, performing transfers, and securely accessing CEX platforms Software and Browser Requirements Browser Extensions: Some browser-based wallets require supported browsers like Chrome or Firefox with the appropriate extension installed. Desktop or Mobile Apps: Some wallets require dedicated desktop or mobile apps for full functionality and token management. Security Measures Private Key and Seed Phrase Storage: Keep your recovery phrase and private keys offline and confidential. If lost, access to your XAN tokens may be permanently unrecoverable. Two-Factor Authentication (2FA): Always enable 2FA on centralised platforms to protect against unauthorised access.	
E.30	Crypto-asset service provider (CASP) name	Revolut Digital Assets Europe Ltd	Free alphanumerical text
E.31	CASP identifier	549300ET4IUR6RCZOL84	{LEI}

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING																
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 XAN tokens are listed by creating an account on their respective platform, completing the required identity verification (KYC) processes, if applicable, and funding their accounts with supported cryptocurrencies or fiat currencies. Once registered and funded, investors can search for the XAN token trading pairs and place buy or sell orders directly through the platform’s interface. Detailed guides and tutorials are generally available on the trading platform to assist investors in navigating and using their services effectively.	Free alphanumerical text																
E.36	Involved costs	<table><thead><tr><th>Platform Type</th><th>Fee Type</th><th>Cost Estimate</th></tr></thead><tbody><tr><td rowspan="2">Centralised Exchange (CEX)</td><td>Trading Fee</td><td>% per trade</td></tr><tr><td>Withdrawal Fee</td><td>platform-specific</td></tr><tr><td rowspan="2">Decentralised Exchange (DEX)</td><td>Swap Fee</td><td>platform-specific</td></tr><tr><td>Gas Fee</td><td>platform-specific</td></tr><tr><td>Fiat On-Ramp</td><td>Service/Processing Fee</td><td>platform-specific</td></tr></tbody></table>	Platform Type	Fee Type	Cost Estimate	Centralised Exchange (CEX)	Trading Fee	% per trade	Withdrawal Fee	platform-specific	Decentralised Exchange (DEX)	Swap Fee	platform-specific	Gas Fee	platform-specific	Fiat On-Ramp	Service/Processing Fee	platform-specific	Free alphanumerical text
Platform Type	Fee Type	Cost Estimate																	
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Fiat On-Ramp	Service/Processing Fee	platform-specific																	

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	Not applicable.	Free alphanumerical text
E.39	Applicable law	Laws of Switzerland, without regard to conflict of law rules or principles, except to the extent that such disputes are governed by applicable law pursuant to the terms and conditions of the Trading Platform	Drop-down list of applicable laws
E.40	Competent court	Any dispute, controversy, or claim arising out of, or in relation to the present White Paper, the Person Seeking Admission to Trading, and the admission to trading shall be resolved exclusively by arbitration, except to the extent that such disputes are subject to a dispute resolution mechanism set forth in the terms and conditions of the respective Trading Platform on which the Token has been admitted for trading. The arbitral proceedings shall be conducted in accordance with the Swiss Rules of International Arbitration of the Swiss Arbitration Centre in force on the date on which the Notice of Arbitration is submitted in accordance with those Rules. ☞ The number of arbitrators shall be three. ☞ The seat of the arbitration shall be Zürich, Switzerland. ☞ The arbitral proceedings shall be conducted in German. A respective arbitral award may only be challenged before the Swiss Supreme Court on the limited grounds as provided in Article 190 para. 2 Swiss	Drop-down list of applicable laws

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Private International Law Act, i.e. (i) improper constitution of the arbitral tribunal; (ii) incorrect decision on jurisdiction; (iii) award beyond the claims submitted or failing to decide all claims submitted; (iv) violation of a party's right to be heard or of its right to equal treatment; and (v) incompatibility of the award with public policy.	
<i>Part F - Information about the crypto-assets</i>			
F.1	Crypto-asset type	Utility token	Free alphanumerical text
F.2	Crypto-asset functionality	See D.8	Free alphanumerical text
F.3	Planned application of functionalities	See D.8. Timelines subject to change and development times.	Free alphanumerical text
<i>A description of the characteristics of the crypto-asset, including the data necessary for classification of the crypto-asset white paper in the register referred to in Article 109 of Regulation (EU) 2023/1114, as specified in accordance with paragraph 8 of that Article</i>			
F.4	Type of crypto-asset white paper	OTHR	OTHR
F.5	The type of submission	NEWT	NEWT = New MODI = Modify EROR = Error CORR = Correction
F.6	Crypto-asset characteristics	Total supply of 10,000,000,000 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	www.anoma.net	Free alphanumerical text
F.9	Starting date of offer to the public or admission to trading	2026-[XX]-[XX]	YYYY-MM-DD

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
F.10	Publication date	2026-[XX]-[XX]	YYYY-MM-DD
F.11	Any other services provided by the issuer	Not applicable.	Free alphanumeric 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
F.16	Personal data flag	true	'true' – Yes 'false' – No
F.17	LEI eligibility	false	'true' – eligible 'false' – not eligible
F.18	Home Member State	Republic of Cyprus	Closed list of EU Member States
F.19	Host Member States	Austria, Belgium, Bulgaria, Croatia, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain and Sweden.	Closed list of EU Member States
<i>Part G - Information on the rights and obligations attached to the crypto-assets</i>			

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
G.1	Purchaser rights and obligations	The Token does not confer any rights or entitlements to its holders. Instead, the Token enables its holders to participate in and interact with the Protocol. The Protocol operates autonomously without the Person Seeking Admission to Trading having an operative role of any sort. As a result, the Person Seeking Admission to Trading, to the fullest extent permitted by applicable laws, disclaims all warranties, whether express or implied, in relation to the Token and its functionalities. This includes, but is not limited to, implied warranties of merchantability and fitness for a particular purpose. Adherence to Terms: Users must comply with any terms of service, using the platform as intended. Lawful Use: All activities must comply with relevant laws, including those relating to anti-money laundering, counter-terrorism, securities, and data protection.	Free alphanumerical text
G.2	Exercise of rights and obligations	Not applicable.	Free alphanumerical text
G.3	Conditions for modifications of rights and obligations	Not applicable.	Free alphanumerical text
G.4	Future public offers	Not applicable.	Free alphanumerical text
G.5	Issuer retained crypto-assets	Anoma Foundation is allocated 10% out of the initial total Token supply. These Tokens are, however, part of the 75% of the initial token supply being illiquid upon Launch of the Protocol on Ethereum Mainnet as their unlock schedule, if any, is subject to the Governance Functionality.	Numerical {INTEGER-n}
G.6	Utility token classification	true	'true' – Yes 'false' – No

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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	true	'true' – sought 'false' – not sought
G.10	Crypto-assets purchase or sale modalities	Not applicable.	Free alphanumerical text
G.11	Crypto-assets transfer restrictions	Exchange-imposed rules may restrict network transfers; users should verify guidelines before sending XAN	Free alphanumerical text
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	false	'true' – Yes 'false' – No
G.15	Token value protection schemes description	Not applicable.	Free alphanumerical text
G.16	Compensation schemes	false	'true' – Yes 'false' – No
G.17	Compensation schemes description	Not applicable.	Free alphanumerical text
G.18	Applicable law	Laws of Switzerland, without regard to conflict of law rules or principles, except to the extent that such disputes are governed by applicable law pursuant to the terms and conditions of the respective Trading Platform on which the Token has been admitted for trading.	Drop-down list of applicable laws

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
G.19	Competent court	Any dispute, controversy, or claim arising out of, or in relation to the present White Paper, the Person Seeking Admission to Trading, the Token and/or the Protocol shall be resolved exclusively by arbitration in accordance with the Swiss Rules of International Arbitration of the Swiss Arbitration Centre. The number of arbitrators shall be three. The seat of the arbitration shall be Zürich, Switzerland. The arbitral proceedings shall be conducted in German.	Free alphanumerical text
<i>Part H – information on the underlying technology</i>			
H.1	Distributed ledger technology (DLT)	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	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		data integrity, and choose platforms that align with their preferences. The permissionless nature of public blockchains promotes seamless integration and innovation across applications, wallets, and services.	
H.2	Protocols and technical standards	The Token relies on the following protocols: (1) Those of the Ethereum blockchain on which it is issued, as described under H.1. (2) Those of its issuance smart contracts, based on the ERC-20 standard defining rules, notably, for token transactions and interactions. (3) Those of the Anoma Protocol itself when Token functionalities are being used.	Free alphanumerical text
H.3	Technology used	Transfer of Tokens: The issuance smart contracts of the Token, as based on the ERC-20 standard on Ethereum, define the technical rules governing the transfer of the Token on Ethereum. No additional technology is required to proceed with the transfer of the Token, as the process occurs on Ethereum in accordance with its standard operation. Holding and Storing Tokens: No additional technology is required to hold XAN, as they remain on Ethereum in accordance with its standard operation; however, users may choose to utilise additional technologies such as specific wallets, including multi-signature wallets, cold storage solutions, or other storage and security products and services.	Free alphanumerical text
H.4	Consensus mechanism	Ethereum operates under a proof of stake (PoS) consensus mechanism, implemented through the Beacon Chain. This system coordinates the network by selecting validators responsible for proposing and attesting to new blocks. Validator selection is based on the amount of ETH staked, rather than computational power, which has resulted in a significant reduction in the network's	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		energy consumption compared to the former proof of work mechanism. As of the date of this white paper, the Ethereum network comprises several hundred thousand active validators. Key features of Ethereum's PoS consensus mechanism include: Validators and staking. Participants must stake ETH in order to operate a validator and contribute to network security, in return for protocol level rewards. ETH holders who do not operate their own validator may participate indirectly through staking services or pools. Epochs and slots. Time within the Ethereum PoS system is structured into slots and epochs, which govern the orderly selection of block proposers and the validation of blocks across the network. Slashing mechanism. Validators that engage in dishonest or protocol violating behaviour may be subject to penalties, including the loss of a portion of their staked ETH, thereby reinforcing correct and secure participation in the consensus process.	
H.5	Incentive mechanisms and applicable fees	Transactions on the Ethereum network, including transfers of the Token, require the payment of gas fees. These fees compensate validators for processing transactions and executing smart contracts. Following the implementation of EIP-1559, Ethereum applies a fee mechanism that introduces a base fee model aimed at improving fee predictability. Under this model, a portion of the transaction fee is burned,	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		which may reduce net ETH issuance over time. In periods of high network activity, the amount of ETH burned may exceed newly issued ETH. The main components of Ethereum transaction fees are as follows: Base fee: A minimum fee that is automatically calculated by the protocol based on network demand and burned upon transaction execution. Priority fee (tip): An optional fee paid by users to incentivise validators to prioritise their transactions. Maximum fee: The maximum total gas price a user is willing to pay for a transaction, providing an upper limit on transaction costs.	
H.6	Use of distributed ledger technology	false	'true' – Yes, DLT operated by the issuer or a third-party acting on the issuer's behalf 'false' – No, DLT not operated by the issuer or a third-party acting on the issuer's behalf

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
H.7	DLT functionality description	DLT is a digital system for recording transactions in which the transactions and their details are recorded in multiple places at the same time. Unlike traditional databases, distributed ledgers have no central data store or administration functionality. Instead, the ledger is decentralised, and consensus on the transactions is achieved through a process that involves multiple nodes, each maintaining its own copy of the ledger. The benefits of DLT include increased transparency, enhanced security, improved traceability, and greater efficiency of transactions.	Free alphanumerical text
H.8	Audit	True	'true' – Yes 'false' – No
H.9	Audit outcome	The Issuer is committed to ensuring the secure development of its smart contracts. To achieve this, it engaged Zellic, a security auditing firm ("Technical Auditor"). The Technical Auditors conducted a comprehensive audit of all components of the Protocol in July 2025. Full Audit report can be found here: https://github.com/anoma/token/blob/main/audits/Zellic_Anoma_Token_%26_TokenDistributor_2025-07-17.pdf. Following best practices, all Protocol and Token smart contract code is publicly available. This transparency allows independent security researchers to assess the code for potential vulnerabilities. Disclaimer: While audits and bug bounties strengthen security, they do not guarantee the absence of all vulnerabilities. Undetected issues or new exploits could still arise, and investors should consider these risks.	Free alphanumerical text
Part I – Information on risks			

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
I.1	Offer-related risks	General Risk Disclosure The offering and trading of XAN tokens involve several risks commonly associated with the broader crypto-asset market, especially within centralised exchange environments, staking mechanisms, and decentralised finance (DeFi) applications tied to the Anoma ecosystem. Market Volatility The value of XAN may experience significant volatility due to shifts in market sentiment, macroeconomic trends, protocol updates, and activity across exchanges. Such fluctuations can lead to financial losses for holders or short-term traders and may affect the perceived value of XAN utility. Liquidity Risk There is no guarantee that XAN will maintain sufficient liquidity or consistent trading volume across supported exchanges. Liquidity constraints may arise from limited market activity, uneven token distribution, or broader market downturns, making it difficult to efficiently buy or sell XAN at stable prices. Regulatory Risk As global regulatory frameworks for crypto-assets evolve, XAN may be affected by new compliance requirements. These could impact the availability of XAN on certain exchanges, restrict marketing or token offerings in specific regions, or impose new disclosure, tax, or governance obligations. AML/KYC Compliance When purchasing or trading XAN via centralised platforms, users are generally required to complete AML and KYC verification. Failure to comply with such procedures can result in restricted access, delayed withdrawals, or account suspensions, depending on the platform and local regulations.	Free alphanumeric text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Market Manipulation As with most tradable digital assets, XAN is exposed to potential manipulative practices such as wash trading, spoofing, or pump-and-dump schemes. These behaviours may artificially inflate or depress market prices, compromising fair price discovery and increasing volatility. Operational Risk The performance and utility of XAN depend on the reliable functioning of the network and smart contract-based platforms. Risks include smart contract bugs, network congestion, gas price spikes, or failures in off-chain infrastructure (e.g., bridges or oracles). Token Utility Risk XAN value is tied to its function in protocol governance, staking, and ecosystem coordination. If XAN fails to grow, or if adoption of its core products declines, the demand and utility of XAN may weaken. Delays in technical upgrades or reduced community engagement could also adversely affect token perception.	
I.2	Issuer-related risks	Issuer and Governance The token is not issued by a regulated financial institution and governance is community driven and changes (if applicable) depend on the core development team and protocol governance structure. Project Continuity Risk The XAN development team are responsible for maintaining the protocol and surrounding infrastructure. If funding, development activity, or user adoption materially declines, the issuer may reduce or cease operations, which could impair the	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		token's utility and long-term viability. Brand and Ecosystem Dependency The value of the XAN token is closely connected to the reputation, adoption, and user base of the Anoma ecosystem and affiliated products. A decline in platform usage, negative media coverage, or more competitive offerings in the exchange space may adversely impact XAN market value and utility. Regulatory Exposure Operating across multiple jurisdictions, the XAN token is exposed to varying legal frameworks, including potential restrictions on exchange operations or token listings. Regulatory developments may require significant operational changes or affect the legal standing of XAN tokens.	
I.3	Crypto-assets-related risks	Speculative Nature XAN is a utility token whose value is derived from its role in the Anoma ecosystem. As with most crypto-assets, XAN is inherently speculative and subject to significant price volatility, influenced by user participation, network activity, market sentiment, and broader macroeconomic conditions. Custodial Risk XAN is a non-custodial bearer instrument, meaning users are solely responsible for safeguarding their private keys and recovery phrases. If access credentials are lost, there is no mechanism to recover tokens. This presents a high custodial risk for less experienced users or those without proper backup measures. Future Use Cases While XAN is currently used for on-chain governance and ecosystem alignment within the Anoma network,	Free alphanumeric text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		its utility may evolve. Future uses could include new DeFi integrations, cross-chain coordination roles, or deeper involvement in infrastructure tooling. However, these potential developments are not guaranteed and depend on community decisions, developer commitment, and the ongoing success of Anoma ecosystem-related projects.	
I.4	Project implementation-related risks	Technical Limitations New product features, liquidity strategies, or integrations may be delayed or limited by technical hurdles, resource constraints, or unanticipated security flaws. Regulatory Developments Increasing scrutiny of centralised platforms may result in the need for protocol restructuring, jurisdictional restrictions, or more extensive reporting obligations. Third-Party Reliance The Anoma ecosystem relies on partnerships with liquidity providers, custodians, and infrastructure partners. Disruptions to these relationships or operational failures among third parties may reduce token effectiveness or compromise platform performance.	Free alphanumerical text
I.5	Technology-related risks	Network Disruptions Issues on blockchain or the Anoma ecosystem may impact token transfers. Network congestion, outages, or protocol-level changes could lead to delays or failures in transaction execution. Exchange Integration Risks Trading XAN on centralised exchanges (CEXs) or decentralised exchanges (DEXs) may expose users to:	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		• Slippage, especially during periods of low liquidity or market volatility • Front-running or manipulation by automated bots on DEXs • Delisting risks, where CEXs may remove support for XAN due to strategic, technical, or regulatory reasons Custodial risk, where funds held on CEXs may be lost in the event of platform hacks, bankruptcy, or internal failure	
I.6	Mitigation measures	Exchange Availability XAN is listed on leading exchanges enhancing access and liquidity. User Engagement XAN 's utility within the Anoma ecosystem drives user engagement. Communication The XAN team publishes regular updates, supports an active user community, and shares development progress through its website and social media.	Free alphanumerical text
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	XAN inherits Ethereum's consensus mechanism—which, is now Proof of Stake (PoS). Proof of Stake (PoS) is a consensus mechanism where validators are chosen to confirm transactions and secure the network based on the amount of cryptocurrency they "stake" as collateral rather than performing energy-intensive computations like Proof of Work (PoW). This PoS approach is far more energy-efficient compared to Bitcoin PoW mining.	Free alphanumerical text