

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

ZORA (ZORA) 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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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

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

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07	Warning in accordance with Article 6(7), second subparagraph, of Regulation (EU) 2023/1114	Warning This summary should be read as an introduction to the crypto-asset white paper. The prospective holder should base any decision to purchase this crypto-asset on the content of the crypto- asset white paper as a whole and not on the summary alone. The offer to the public of this crypto-asset does not constitute an offer or solicitation to purchase financial instruments and any such offer or solicitation can be made only by means of a prospectus or other offer documents pursuant to the applicable national law. This crypto-asset white paper does not constitute a prospectus as referred to in Regulation (EU) 2017/1129 of the European Parliament and of the Council or any other offer document pursuant to Union or national law.	Predefined alphanumerical text
08	Characteristics of the crypto-asset	The ZORA (“ ZORA ”) token is a utility token as defined by Article 3(1)(9) of Regulation (EU) 2023/1114 of the European Parliament and Council of 31 May 2023 on markets in crypto-assets (“ MiCA ”).	Free alphanumerical text
09		Not applicable.	Free alphanumerical text
10	Key information about the offer to the public or admission to trading	https://coinmarketcap.com/currencies/zora/ https://www.coingecko.com/fr/coins/zora As of 2026-02-23, 4,469,999,999 ZORA tokens are in circulation, out of a total and maximum supply of 10,000,000,000 ZORA tokens.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
<i>Part A - Information about the offeror or the person seeking admission to trading</i>			
A.1	Name	Zora Labs, Inc.	Free alphanumeric text
A.2	Legal form	XTIQ – Delaware Corporation	ISO standard 20275 'Financial Services – Entity Legal Forms (ELF)'
A.3	Registered address	US, Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801, USA	ISO standard 3166-1 alpha 2 country codes and codes for their subdivisions and Free alphanumeric text
A.4	Head office	US, 548 Market Street, PMB 66875, San Francisco, CA 94104, USA	ISO standard 3166-1 alpha 2 country codes and codes for their subdivisions and Free alphanumeric text
A.5	Registration date	2020-03-10	ISO 8601 date format (YYYY-MM-DD)
A.6	Legal entity identifier	Not applicable.	{LEI}
A.7	Another identifier required pursuant to applicable national law	7893690	Free text
A.8	Contact telephone number	+1 (415) 294-1238	Free alphanumeric text
A.9	E-mail address	legal@ourzora.com	Free alphanumeric text
A.10	Response time (Days)	3 days	{DURATION}

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
A.11	Parent company	Not applicable.	Free alphanumerical text
A.12	Members of the management body	Jacob Horne - Chief Executive Officer LaDarius Goens – Chief Operating Officer Tyson Battistella – Chief technology Officer	Free alphanumerical text presented in a tabular format
A.13	Business activity	Zora Labs, Inc. is a privately held technology company founded in 2020 that develops blockchain-based software infrastructure and application interfaces supporting the creation and exchange of tokenised digital media assets. The company contributes to the development and maintenance of the Zora web and mobile applications as well as components of the Zora Protocol, an open-source smart contract infrastructure deployed on Ethereum-compatible blockchain networks, including Layer-2 environments such as Base. The Zora Protocol enables users to mint, distribute, buy and sell blockchain-recorded digital media content through decentralised marketplace mechanisms. Operating under a permissionless architecture, the protocol allows third-party developers and organisations to build independent applications utilising its smart contract infrastructure. This approach promotes interoperability, composability and creator-controlled digital asset distribution within the broader Ethereum ecosystem.	Free alphanumerical text
A.14	Parent company business activity	Not applicable.	Free alphanumerical text
A.15	Newly established	false	'true' – Yes 'false' – No

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
A.16	Financial condition for the past three years 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.	Zora Labs, Inc. (referred to in this section as “Zora” or the “Company”) is a privately held technology company founded in 2020 that develops on-chain creator economy software and blockchain protocol infrastructure. Originally built as an NFT minting and marketplace platform, Zora has evolved into a decentralised on-chain social network where user content and creator activity can be tokenised and traded as ERC-20 “coins” on the Base network, a layer-2 solution on the Ethereum blockchain. ZORA, the protocol's native token, was launched in April 2025 and is used across the ecosystem without granting governance rights or equity ownership. Since its inception, Zora has focused on enabling creators and developers to engage with digital media and tokenised content through decentralised marketplace mechanisms and composable smart contracts. The Company continues to support the creation, trading and economic participation of creators and collectors on Base, while the creator platform has migrated to creators.zora.com with existing creator and content coins remaining fully tradable onchain. The protocol's NFT support and legacy “Zora Network” have been deprecated in favour of the Base-centric model that underpins the current token and content coin economy.	Free alphanumeric 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.	See A.16 above.	Free alphanumeric text

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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
C.4	Head office	Pikioni, 10 Flat/Office 5, 3075, Limassol, Cyprus	ISO standard 3166-1 alpha 2 country codes and codes for their subdivisions and Free alphanumerical text
C.5	Registration date	2022-08-09	ISO 8601 date format (YYYY-MM-DD)
C.6	Legal entity identifier	549300ET4IUR6RCZOL84	{LEI}
C.7	Another identifier required pursuant to applicable national law	Company registration number: HE430310	Free text
C.8	Parent company	Revolut Group Holdings Ltd	Free alphanumerical text
C.9	Reason for crypto-asset white paper Preparation	This crypto-asset white paper has been drawn up in accordance with the requirements of Article 4, Article 6 and Article 8 of Regulation (EU) 2023/1114.	Free alphanumerical text
C.10	Members of the Management body	Mr Costas Michael (CEO) Mr Christos Drakos (CFO) Mr Ioannis Ashiotis (NED) Mr Konstantinos Adamos (NED)	Free alphanumerical text presented in a tabular format

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
C.11	Operator business activity	Revolut Digital Assets Europe Ltd is a financial technology company registered as a crypto-assets services provider by the Cyprus Securities and Exchange Commission. Revolut Digital Assets Europe Ltd provides crypto-asset services across the European Union, including buying, selling, and exchange of crypto-assets. Revolut Digital Assets Europe Ltd has applied to the Cyprus Securities and Exchange Commission for a crypto-asset services provider (CASP) authorisation under Regulation (EU) 2023/1114. The authorisation is expected to cover the following crypto-asset services: • exchange of crypto-assets for funds • exchange of crypto-assets for crypto-assets • operation of a Trading Platform • custody and administration of crypto-assets • transfer of crypto-assets	Free alphanumeric text
C.12	Parent company business activity	Revolut Digital Assets Europe Ltd is a wholly-owned subsidiary of Revolut Group Holdings Ltd, a private company limited by shares registered in England and Wales (company number: 12743269)	Free alphanumeric 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 alphanumeric text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
C.14	Reason for drawing the white paper by persons referred to in Article 6(1), second subparagraph, of Regulation (EU) 2023/1114	Not applicable	Free alphanumerical text
<i>Part D- Information about the crypto-asset project</i>			
D.1	Crypto-asset project name	ZORA	Free alphanumerical text
D.2	Crypto-assets name	ZORA	Free alphanumerical text
D.3	Abbreviation	\$ZORA	Free alphanumerical text
D.4	Crypto-asset project description	ZORA is designed primarily for entertainment and social engagement purposes, and to provide builders within the ZORA ecosystem with a mechanism to incentivise activity on the Zora Protocol — a decentralised, open-source protocol for publishing, discovering, and transacting media on-chain. The Zora Protocol uses ZORA as the default reward token for creator and platform incentives, and as the primary liquidity token for newly issued creator markets. The protocol is open-source and permissionless, and is primarily developed and maintained by Zora Labs, Inc.	Free alphanumerical text
D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project	Zora Labs, Inc. 548 Market Street, PMB 66875, San Francisco, CA 94104, USA Software development and ecosystem support	Free alphanumerical text presented in a tabular format
D.6	Utility Token Classification	true	'true' – Yes 'false' – No

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
D.7	Key Features of Goods/Services for Utility Token Projects	Key features of the ZORA token include: • Utility as a core economic token: ZORA serves as the native utility token of the Zora platform, powering transactional activity such as trading and interacting with tokenised content and content-related assets on the network. It functions as the base currency within the Zora ecosystem, facilitating utility actions like minting and trading content coins. • Creator reward system: The token incentivises participation and rewards creators; portions of trading fees from content-related tokens and activities are distributed in ZORA to original creators and other participants as part of ecosystem engagement incentives. • Liquidity and network demand: ZORA is paired with content tokens on the platform, creating ongoing demand tied to creator activity and usage of the Zora protocol. • In-app network activity: ZORA is required for participation in key functions on the Zora social and creator platform (e.g., minting content coins, engaging with the on-chain social economy, and paying fees associated with platform interactions). • Community incentives and growth alignment: The token supports incentive programs, including rewards for referrals, active participation, and ecosystem engagement that align	Free alphanumeric text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		participant behaviour with growth and platform usage. Ecosystem foundation rather than governance: ZORA is positioned primarily as a utility and incentive token rather than a governance token; it underpins participation and activity within the creator-centric ecosystem rather than conferring formal governance rights.	
D.8	Plans for the token	Zora Labs, Inc. has integrated \$ZORA with the web/mobile applications via the Zora Protocol. Zora Labs, Inc. reserves the right to integrate \$ZORA into other products and applications at a later date.	Free alphanumerical text
D.9	Resource allocation	34 employees of Zora Labs, Inc., contributed to the development of \$ZORA. Data: 29,280 USD Protocol: 27,430 USD Legal and Operations: 25,687 USD Product: 27,020 USD Tools (Dune): 3,000 USD	Free alphanumerical text
D.10	Planned use of collected funds or crypto-assets	Not applicable. The issuer is seeking admission to secondary trading only, through which the issuer will not gain any direct proceeds.	Free alphanumerical text
<i>Part E - Information about the offer to the public of crypto-assets or their admission to trading</i>			
E.1	Public offering or admission to trading	ATTR	'OTPC' - offer to the public 'ATTR' - admission to trading

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.2	Reasons for public offer or admission to trading	The purpose of the proposed admission to trading of ZORA is to enable persons in the EU and EEA to purchase and trade ZORA tokens. ZORA is admitted for trading on multiple centralised platforms (Bybit, Coinbase Exchange, LBank, etc.) to ensure token liquidity, facilitate user access, and support the Zora ecosystem, which is centered on NFTs and on-chain creation.	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 Numerical {INTEGER-n}
E.9	Official currency or any other crypto-assets determining the issue price	USD	{CURRENCYCODE_3} or {DTI}

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.10	Subscription fee	Not applicable.	Amount in monetary value {DECIMAL-18/3} Or Numerical {INTEGER-n}
E.11	Offer price determination method	No offer price has been determined by the person seeking admission to trading. The market price of ZORA tokens is determined exclusively by secondary market supply and demand on trading platforms where the crypto-asset is admitted.	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	None.	Free alphanumerical text
E.15	Reimbursement notice	Not applicable.	Predefined alphanumerical text
E.16	Refund mechanism	Not applicable.	Free alphanumerical text
E.17	Refund timeline	Not applicable.	Free alphanumerical text
E.18	Offer phases	Not applicable.	Free alphanumerical text
E.19	Early purchase discount	Information not publicly available.	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)

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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		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 ZORA tokens. 2. Navigate to the ‘Withdraw’ or ‘Send’ Section • On exchanges, go to the “Withdraw” or “Assets” page. • On personal wallets, select the ZORA 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 ZORA tokens on the correct blockchain. • Using the wrong chain or incorrect address could result in permanent loss of your tokens.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		4. Specify the Amount • Input the number of ZORA tokens you wish to transfer. • Some platforms may require a minimum transfer amount. 5. Select the Network (if applicable) • If your ZORA 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.	
E.28	Transfer time schedule	Not applicable.	ISO 8601 date format (YYYY-MM-DD)
E.29	Purchaser's technical requirements	Purchaser Requirements: Digital Wallet • Blockchain Compatibility: ZORA tokens exist on the Base blockchain. Purchasers must use a	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		wallet that supports ZORA 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 ZORA 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 ZORA through exchanges, you 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	

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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING																
E.35	Trading platforms access	Investors can access trading platforms where ZORA 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 ZORA 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 (DEX)</td><td>Exchange 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 (DEX)	Exchange Swap Fee	platform-specific	Gas Fee	platform-specific	Fiat On-Ramp	Service/Processing Fee	platform-specific	Free alphanumerical text
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	Gas Fee	platform-specific																	
Fiat On-Ramp	Service/Processing Fee	platform-specific																	
E.37	Offer expenses	Not applicable.	Free alphanumerical text and Amount in monetary value {DECIMAL-18/3}																
E.38	Conflicts of interest	No specific conflict of interest affecting the admission to trading has been identified at the date of this white paper.	Free alphanumerical text																

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.39	Applicable law	Any dispute relating to the admission of the Token to trading shall be governed by and construed and enforced in accordance with the laws of the United States of America.	Drop-down list of applicable laws
E.40	Competent court	Any dispute relating to the admission of the Token to trading shall be exclusively resolved by the ordinary courts of the United States of America.	Drop-down list of applicable laws
<i>Part F - Information about the crypto-assets</i>			
F.1	Crypto-asset type	Utility token	Free alphanumerical text
F.2	Crypto-asset functionality	See D.8	Free alphanumerical text
F.3	Planned application of functionalities	See D.8. Timelines subject to change and development times.	Free alphanumerical text
<i>A description of the characteristics of the crypto-asset, including the data necessary for classification of the crypto-asset white paper in the register referred to in Article 109 of Regulation (EU) 2023/1114, as specified in accordance with paragraph 8 of that Article</i>			
F.4	Type of crypto-asset white paper	OTHR	OTHR
F.5	The type of submission	NEWT	NEWT = New MODI = Modify EROR = Error CORR = Correction
F.6	Crypto-asset characteristics	ZORA has a fixed total supply of 10,000,000,000 units. The tokens were initially distributed through a combination of initial allocations to contributors and may be subject to ongoing incentive mechanisms. There is no continuous minting or burning mechanisms	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		beyond the initial token logic.	
F.7	Commercial name or trading name	See DTI in F.13	Free alphanumeric text
F.8	Website of the issuer	https://www.zora.co/	Free alphanumeric text
F.9	Starting date of offer to the public or admission to trading	2026-[XX]-[XX]	YYYY-MM-DD
F.10	Publication date	2026-[XX]-[XX]	YYYY-MM-DD
F.11	Any other services provided by the issuer	Zora Labs, Inc. additionally operates the Zora web and mobile application platforms, as well as the developer of the Zora Protocol, a permissionless set of Ethereum Virtual Machine (EVM)-compatible smart contracts.	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	M4DCVM90D	ISO 24165 Digital Token Identifier
F.14	Functionally fungible group digital token identifier, where available	RP9Z7X3F9	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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
			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>			
G.1	Purchaser rights and obligations	Holders can freely transfer their ZORA tokens on-chain to other users or trade them on available markets at their discretion. There are no mandatory obligations imposed on ZORA purchasers. Holding Token does not entitle any governance rights or equity ownership in ZORA Ecosystem. Obligations: 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	ZORA does not carry any contractual rights or obligations to exercise. Users control their ZORA holdings by managing their private keys and ensuring compliance with applicable laws and regulations when transacting with ZORA.	Free alphanumerical text
G.3	Conditions for modifications of rights and	The smart contracts governing ZORA token	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
	obligations	supply are immutable. However, ecosystem-level functionalities and integrations may evolve through decentralised governance or protocol upgrades without modifying the token itself.	
G.4	Future public offers	Not applicable.	Free alphanumerical text
G.5	Issuer retained crypto-assets	Information not publicly available.	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	ZORA tokens can be purchased and sold via centralised exchanges using common trading pairs such as ZORA /USDT. ZORA is also available on decentralised exchanges.	Free alphanumerical text
G.11	Crypto-assets transfer restrictions	Exchange-imposed rules may restrict network transfers; users should verify guidelines before sending ZORA.	Free alphanumerical text
G.12	Supply adjustment protocols	false	'true' – Yes 'false' – No
G.13	Supply adjustment mechanisms	Not applicable.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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	Any dispute relating to the admission of the Token to trading shall be governed by and construed and enforced in accordance with the laws of the United States of America.	Drop-down list of applicable laws
G.19	Competent court	Any dispute relating to the admission of the Token to trading shall be exclusively resolved by the ordinary courts of the United States of America.	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	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		transaction data. Each block is cryptographically connected to the previous one, making it virtually immutable and resistant to retroactive alteration. Blockchains can also support smart contracts, self-executing agreements that automate processes and enforce rules without intermediaries, thereby increasing trust and efficiency in decentralised systems. Blockchain-based DLT enhances transparency, consumer choice, and interoperability within the broader digital economy. Users can inspect open-source blockchain code, independently verify data integrity, and choose platforms that align with their preferences. The permissionless nature of public blockchains promotes seamless integration and innovation across applications, wallets, and services.	
H.2	Protocols and technical standards	ERC-20 on Base, an Ethereum L2 network	Free alphanumerical text
H.3	Technology used	ZORA is an ERC-20 token deployed on Base, an Ethereum L2 scaling solution developed by Coinbase and built on the open-source OP Stack. Base operates as an optimistic rollup, executing transactions off the Ethereum blockchain while periodically posting state commitments to Ethereum Mainnet for settlement and security. This architecture allows ZORA transactions to benefit from low gas fees and high throughput while inheriting Ethereum's security guarantees. Base uses a Proof-of-Stake consensus mechanism of Ethereum by indirectly anchoring its state to the Ethereum Mainnet. While transactions are processed initially in the	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Base environment, data availability and finality are ultimately secured by Ethereum validators. The OP Stack framework is modular and open-source, enabling protocol-level upgrades and community contributions over time. ZORA itself conforms to the ERC-20 standard and is interoperable with Ethereum-compatible applications on Base. It is compatible with the Zora Protocol; a decentralised media and creator infrastructure suite deployed on Base and other EVM-compatible networks. The Zora Protocol consists of a set of smart contracts used for creating, transacting with other ERC-20 tokens. These smart contracts are also public and open-source, and verifiable on block explorers for the specific blockchain networks supported by the Zora Protocol. The Zora Protocol and other developer tools developed by Zora Labs, Inc. are designed for maximum composability with other Ethereum- and Base-based applications.	
H.4	Consensus mechanism	Proof-of-Stake	Free alphanumerical text
H.5	Incentive mechanisms and applicable fees	Every Base transaction consists of two costs: an L2 (execution) fee and a layer-1 (L1) (security) fee. The L2 fee is the cost to execute a transaction on the L2, and the L1 fee is the estimated cost to publish the transaction on the L1. Typically, the L1 security fee is higher than the L2 execution fee. The L1 fee will vary depending on the amount of transactions on the L1 based on network traffic. For example, typically gas fees are lower during weekends. Currently, the L1 gas fees are governed by Ethereum Improvement Proposal (EIP) 1559. Under EIP 1559, gas	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		fees will have two components – a base fee and a tip. The base fee will be a standard charge that all users will pay. It will be calculated by the network based on network traffic. The tip will be an optional extra payment that users can pay to speed up their transactions. EIP-1559 also requires that the network burn all Ether tokens used to pay base fees. This procedure will reduce the total supply of Ether tokens, making Ether more scarce and therefore more valuable. Similarly, the L2 fees can increase and decrease depending on the number of transactions submitted to the L2. This adjustment mechanism has the same implementation as the L1.	
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
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

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
H.8	Audit	true	'true' – Yes 'false' – No
H.9	Audit outcome	The Zellic website shows a repository of audits: "Reports" section. The audit report did not identify any security risks at any impact level. As per Zora Labs, Inc., the contracts have been audited by Zellic. ZORA Source Code: https://github.com/ourzora/zora-token Security Assessment Results: https://github.com/ourzora/zora-token/blob/main/audit/Zora%20Token%20-%20Zellic%20Audit%20Report.pdf	Free alphanumerical text
Part I – Information on risks			
I.1	Offer-related risks	General Risk Disclosure The offering and trading of ZORA 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 Zora Labs, Inc. ecosystem. Market Volatility The value of ZORA 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 ZORA utility. Liquidity Risk There is no guarantee that ZORA will maintain	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		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 ZORA at stable prices. Regulatory Risk As global regulatory frameworks for crypto-assets evolve, ZORA may be affected by new compliance requirements. These could impact the availability of ZORA 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 ZORA 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. Market Manipulation As with most tradable digital assets, ZORA 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 ZORA 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	

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		infrastructure (e.g., bridges or oracles). Token Utility Risk ZORA value is tied to its function in protocol governance, staking, and ecosystem coordination. If ZORA fails to grow, or if adoption of its core products declines, the demand and utility of ZORA 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 ZORA 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 token's utility and long-term viability. Brand and Ecosystem Dependency The value of the ZORA token is closely connected to the reputation, adoption, and user base of the Zora Labs, Inc. ecosystem and affiliated products. A decline in platform usage, negative media coverage, or more competitive offerings in the exchange space may adversely impact ZORA market value and utility.	Free alphanumeric text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Regulatory Exposure Operating across multiple jurisdictions, the ZORA 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 ZORA tokens.	
I.3	Crypto-assets-related risks	Speculative Nature ZORA is a utility token whose value is derived from its role in the Zora Labs, Inc. ecosystem. As with most crypto-assets, ZORA is inherently speculative and subject to significant price volatility, influenced by user participation, network activity, market sentiment, and broader macroeconomic conditions. Custodial Risk ZORA 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.	Free alphanumeric text
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	Free alphanumeric text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		restructuring, jurisdictional restrictions, or more extensive reporting obligations. Third-Party Reliance The Zora Labs, Inc. 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.	
I.5	Technology-related risks	Network Disruptions Issues on blockchain or the Zora Labs, Inc. 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 ZORA on centralised exchanges (CEXs) or decentralised exchanges (DEXs) may expose users to: • 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 ZORA 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	Free alphanumerical text
I.6	Mitigation measures	Exchange Availability ZORA is listed on leading exchanges enhancing access and liquidity.	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		User Engagement ZORA 's utility within the Zora Labs, Inc. ecosystem drives user engagement. Communication The ZORA team publishes regular updates, supports an active user community, and shares development progress through its website and social media.	
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	\$ZORA is issued on Base, a Layer 2 blockchain built on top of Ethereum. Base leverages rollup technology, which allows it to batch and compress large volumes of transactions before submitting them to the Ethereum Mainnet for final settlement. This design drastically reduces the energy consumption per transaction compared to direct use of Ethereum Mainnet. Using Optimism's OP Stack, Base operates under an optimistic rollup model that provides both scalability and lower environmental impact. Transactions on Base are significantly less resource-intensive than those conducted on Ethereum Mainnet due to the following factors: • Lower computational burden per transaction by aggregating transactions off-chain and settling them in batches; • Reduced gas usage on Ethereum Mainnet per transaction, lowering the indirect carbon footprint; and • Improved energy efficiency across	Free alphanumerical text

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		the network compared to traditional proof-of-work systems or legacy blockchain architectures. While Ethereum has transitioned to a proof-of-stake consensus mechanism, further reducing its energy demands, Base builds upon this shift by adding transactional efficiency. Consequently, the environment impact of \$ZORA transactions is negligible compared to historical norms in blockchain ecosystems, and materially lower than typical Ethereum Mainnet usage prior to the proof-of-stake upgrade. \$ZORA does not rely on mining or proof-of-work validation. It has no staking or delegation mechanism that requires persistent computational activity, and it does not embed or trigger smart contracts that perform energy-intensive computations.	