White paper drafted under the European Markets in Crypto-Assets Regulation (EU) 2023/1114 for FFG 4PS1S77QG

Preamble

00. Table of Contents

01. Date of notification10
02. Statement in accordance with Article 6(3) of Regulation (EU) 2023/111410
03. Compliance statement in accordance with Article 6(6) of Regulation (EU) 2023/1114
04. Statement in accordance with Article 6(5), points (a), (b), (c), of Regulation (EU
05. Statement in accordance with Article 6(5), point (d), of Regulation (EU) 2023/111410
06. Statement in accordance with Article 6(5), points (e) and (f), of Regulation (EU
Summary11
07. Warning in accordance with Article 6(7), second subparagraph, of Regulation (EU)
08. Characteristics of the crypto-asset11
09. Information about the quality and quantity of goods or services to which the utility tokens give access and restrictions on the transferability12
10. Key information about the offer to the public or admission to trading12
Part A – Information about the offeror or the person seeking admission to trading12
A.1 Name
A.2 Legal form12
A.3 Registered address12
A.4 Head office12
A.5 Registration date12
A.6 Legal entity identifier13
A.7 Another identifier required pursuant to applicable national law13

A.8 Contact telephone number	13
A.9 E-mail address	13
A.10 Response time (Days)	13
A.11 Parent company	13
A.12 Members of the management body	13
A.13 Business activity	13
A.14 Parent company business activity	13
A.15 Newly established	14
A.16 Financial condition for the past three years	14
A.17 Financial condition since registration	14
Part B – Information about the issuer, if different from the offeror or personal admission to trading	J
B.1 Issuer different from offeror or person seeking admission to trading	14
B.2 Name	14
B.3 Legal form	14
B.4. Registered address	14
B.5 Head office	14
B.6 Registration date	14
B.7 Legal entity identifier	15
B.8 Another identifier required pursuant to applicable national law	15
B.9 Parent company	15
B.10 Members of the management body	15
B.11 Business activity	15
B.12 Parent company business activity	15
Part C – Information about the operator of the trading platform in cases whe	re it draws
up the crypto-asset white paper and information about other persons d	rawing the

	rypto-asset white paper pursuant to Article 6(1), second subparagraph, of Regul	
E	EU) 2023/1114	15
	C.1 Name	15
	C.2 Legal form	15
	C.3 Registered address	15
	C.4 Head office	15
	C.5 Registration date	16
	C.6 Legal entity identifier	16
	C.7 Another identifier required pursuant to applicable national law	16
	C.8 Parent company	16
	C.9 Reason for crypto-Asset white paper Preparation	16
	C.10 Members of the Management body	16
	C.11 Operator business activity	16
	C.12 Parent company business activity	16
	C.13 Other persons drawing up the crypto-asset white paper according to Article	: 6(1),
	second subparagraph, of Regulation (EU) 2023/1114	16
	C.14 Reason for drawing the white paper by persons referred to in Article 6(1), se	cond
	subparagraph, of Regulation (EU) 2023/1114	16
)	art D – Information about the crypto-asset project	17
	D.1 Crypto-asset project name	17
	D.2 Crypto-assets name	17
	D.3 Abbreviation	17
	D.4 Crypto-asset project description	17
	D.5 Details of all natural or legal persons involved in the implementation of the cr	ypto-
	asset project	17
	D 6 Utility Token Classification	18

	D.7 Key Features of Goods/Services for Utility Token Projects	.18
	D.8 Plans for the token	.18
	D.9 Resource allocation	.19
	D.10 Planned use of Collected funds or crypto-Assets	.20
Ρ	art E – Information about the offer to the public of crypto-assets or their admission	า to
tı	ading	.20
	E.1 Public offering or admission to trading	.20
	E.2 Reasons for public offer or admission to trading	.20
	E.3 Fundraising target	.20
	E.4 Minimum subscription goals	.20
	E.5 Maximum subscription goals	.21
	E.6 Oversubscription acceptance	.21
	E.7 Oversubscription allocation	21
	E.8 Issue price	.21
	E.9 Official currency or any other crypto-assets determining the issue price	.21
	E.10 Subscription fee	.21
	E.11 Offer price determination method	.21
	E.12 Total number of offered/traded crypto-assets	.21
	E.13 Targeted holders	.22
	E.14 Holder restrictions	.22
	E.15 Reimbursement notice	.22
	E.16 Refund mechanism	.22
	E.17 Refund timeline	.22
	E.18 Offer phases	.22
	E.19 Early purchase discount	22
	E.20 Time-limited offer	23

	E.21 Subscription period beginning	23
	E.22 Subscription period end	23
	E.23 Safeguarding arrangements for offered funds/crypto- Assets	23
	E.24 Payment methods for crypto-asset purchase	23
	E.25 Value transfer methods for reimbursement	23
	E.26 Right of withdrawal	23
	E.27 Transfer of purchased crypto-assets	23
	E.28 Transfer time schedule	23
	E.29 Purchaser's technical requirements	24
	E.30 Crypto-asset service provider (CASP) name	24
	E.31 CASP identifier	24
	E.32 Placement form	24
	E.33 Trading platforms name	24
	E.34 Trading platforms Market identifier code (MIC)	24
	E.35 Trading platforms access	24
	E.36 Involved costs	24
	E.37 Offer expenses	24
	E.38 Conflicts of interest	25
	E.39 Applicable law	25
	E.40 Competent court	25
Р	Part F – Information about the crypto-assets	25
	F.1 Crypto-asset type	25
	F.2 Crypto-asset functionality	26
	F.3 Planned application of functionalities	26
	A description of the characteristics of the crypto asset, including the data necess for classification of the crypto-asset white paper in the register referred to in Art	-

Article	
F.4 Type of crypto-asset white paper	26
F.5 The type of submission	26
F.6 Crypto-asset characteristics	27
F.7 Commercial name or trading name	27
F.8 Website of the issuer	27
F.9 Starting date of offer to the public or admission to trading	27
F.10 Publication date	27
F.11 Any other services provided by the issuer	27
F.12 Language or languages of the crypto-asset white paper	27
F.13 Digital token identifier code used to uniquely identify the crypto-asset or ethe several crypto assets to which the white paper relates, where available	
F.14 Functionally fungible group digital token identifier, where available	27
F.15 Voluntary data flag	27
F.16 Personal data flag	28
F.17 LEI eligibility	28
F.18 Home Member State	28
F.19 Host Member States	28
Part G – Information on the rights and obligations attached to the crypto-assets	28
G.1 Purchaser rights and obligations	28
G.2 Exercise of rights and obligations	28
G.3 Conditions for modifications of rights and obligations	28
G.4 Future public offers	28
G.5 Issuer retained crypto-assets	29
G.6 Utility token classification	29

	G.7 Key features of goods/services of utility tokens	29
	G.8 Utility tokens redemption	30
	G.9 Non-trading request	30
	G.10 Crypto-assets purchase or sale modalities	30
	G.11 Crypto-assets transfer restrictions	30
	G.12 Supply adjustment protocols	30
	G.13 Supply adjustment mechanisms	30
	G.14 Token value protection schemes	31
	G.15 Token value protection schemes description	31
	G.16 Compensation schemes	31
	G.17 Compensation schemes description	31
	G.18 Applicable law	31
	G.19 Competent court	31
F	Part H – information on the underlying technology	31
	H.1 Distributed ledger technology (DTL)	31
	H.2 Protocols and technical standards	31
	H.3 Technology used	33
	H.4 Consensus mechanism	35
	H.5 Incentive mechanisms and applicable fees	37
	H.6 Use of distributed ledger technology	38
	H.7 DLT functionality description	39
	H.8 Audit	39
	H.9 Audit outcome	39
F	Part I – Information on risks	39
	I.1 Offer-related risks	30

	I.2 Issuer-related risks	41
	I.3 Crypto-assets-related risks	42
	I.4 Project implementation-related risks	47
	I.5 Technology-related risks	47
	I.6 Mitigation measures	49
Ρ	art J – Information on the sustainability indicators in relation to adverse impact on	the
C	imate and other environment-related adverse impacts	49
	J.1 Adverse impacts on climate and other environment-related adverse impacts	49
	S.1 Name	49
	S.2 Relevant legal entity identifier	49
	S.3 Name of the cryptoasset	49
	S.4 Consensus Mechanism	49
	S.5 Incentive Mechanisms and Applicable Fees	51
	S.6 Beginning of the period to which the disclosure relates	53
	S.7 End of the period to which the disclosure relates	53
	S.8 Energy consumption	53
	S.9 Energy consumption sources and methodologies	53
	S.10 Renewable energy consumption	53
	S.11 Energy intensity	54
	S.12 Scope 1 DLT GHG emissions – Controlled	54
	S.13 Scope 2 DLT GHG emissions – Purchased	54
	S.14 GHG intensity	54
	S.15 Key energy sources and methodologies	54
	S.16 Key GHG sources and methodologies	54

01. Date of notification

2025-08-22

02. Statement in accordance with Article 6(3) of Regulation (EU)

2023/1114

This crypto-asset white paper has not been approved by any competent authority in any

Member State of the European Union. The person seeking admission to trading of the

crypto-asset is solely responsible for the content of this crypto-asset white paper.

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.

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.

05. Statement in accordance with Article 6(5), point (d), of

Regulation (EU) 2023/1114

Since the token has multiple functions (hybrid token), these are already conceptually not

utility tokens within the meaning of the MiCAR within the definition of Article 3, 1. (9),

due to the necessity "exclusively" being intended to provide access to a good or a

service supplied by its issuer only.

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.

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.

08. Characteristics of the crypto-asset

The SAHARA tokens referred to in this white paper are crypto-assets other than EMTs and ARTs and are issued on the Ethereum and BNB Smart Chain network (2025-08-16 and according to DTI FFG shown in F.14).

The initial production of the (total) 10,000,000,000 tokens (the so-called "mint") took place on Ethereum at 2025-06-16 15:46:59 (see transaction: https://etherscan.io/tx/0x6dfbb79d90f03cf8419c2d01dc46a2e24eafc7320a7596129566 28fd173542a9) and on BNB Smart Chain at 2025-06-21 5:59:25 (see transaction: https://bscscan.com/tx/0xa513ab7c620b405598ef9f6ac0cbd3518a203a74c2c5277592 9aa64c279592bd).

11

09. Information about the quality and quantity of goods or

services to which the utility tokens give access and restrictions

on the transferability

Not applicable.

10. Key information about the offer to the public or admission to

trading

This white paper concerns the admission to trading of the crypto-asset " Sahara Al" by

"Sahara Company (BVI) Ltd" in accordance to Article 5 of REGULATION (EU) 2023/1114

OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 31 May 2023 on markets in

crypto-assets, and amending Regulations (EU) No 1093/2010 and (EU) No 1095/2010

and Directives 2013/36/EU and (EU) 2019/1937.

The following platforms are in scope for this while drafting up this white paper: Bitvavo

B.V. Additional platforms aren't excluded in the future.

Part A - Information about the offeror or the person seeking

admission to trading

A.1 Name

Sahara Company (BVI) Ltd

A.2 Legal form

6EH6

A.3 Registered address

VG Craigmuir Chambers, Road Town, Tortola, VG 1110

A.4 Head office

VG Craigmuir Chambers, Road Town, Tortola, VG 1110

A.5 Registration date

2025-03-13

A.6 Legal entity identifier

Not available.

A.7 Another identifier required pursuant to applicable national law

BVI registry: 2171958

A.8 Contact telephone number

Not available.

A.9 E-mail address

support@sahara.foundation

A.10 Response time (Days)

030

A.11 Parent company

Sahara Foundation (Registered Address: KY P. O. Box 10240, 4th Floor, Harbour Place, 103 South Church Street, George Town, Grand Cayman KY1-1002)

A.12 Members of the management body

Name	Function	Business address
Sahara Foundation	Director	KY P. O. Box 10240, 4th
		Floor, Harbour Place, 103
		South Church Street,
		George Town, Grand
		Cayman KY1-1002

A.13 Business activity

Sahara Company (BVI) Ltd is responsible for the original issuance of the SAHARA token.

A.14 Parent company business activity

The Sahara Foundation has been formed with the intention to support the Sahara Network. The foundation is planning to continue the support the project as an initiative,

fostering community engagement to expand its technical infrastructure and sponsoring research on scalability, security, and decentralization.

A.15 Newly established

Yes

A.16 Financial condition for the past three years

Not applicable.

A.17 Financial condition since registration

The issuer has not incurred significant expenditures to date and appears to be in a stable financial position. As a result, the project is expected to be capable of continuing its activities under the issuer's present role.

Part B – Information about the issuer, if different from the offeror or person seeking admission to trading

B.1 Issuer different from offeror or person seeking admission to trading

No

B.2 Name

Not applicable.

B.3 Legal form

Not applicable.

B.4. Registered address

Not applicable.

B.5 Head office

Not applicable.

B.6 Registration date

Not applicable.

B.7 Legal entity identifier Not applicable. B.8 Another identifier required pursuant to applicable national law Not applicable. **B.9 Parent company** Not applicable. **B.10** Members of the management body Not applicable. **B.11** Business activity Not applicable. **B.12 Parent company business activity** Not applicable. Part C - Information about the operator of the trading platform in cases where it draws up the crypto-asset white paper and information about other persons drawing the crypto-asset white

paper pursuant to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114

C.1 Name

Not applicable.

C.2 Legal form

Not applicable.

C.3 Registered address

Not applicable.

C.4 Head office

Not applicable.

C.5 Registration date

Not applicable.

C.6 Legal entity identifier

Not applicable.

C.7 Another identifier required pursuant to applicable national law

Not applicable.

C.8 Parent company

Not applicable.

C.9 Reason for crypto-Asset white paper Preparation

Not applicable.

C.10 Members of the Management body

Not applicable.

C.11 Operator business activity

Not applicable.

C.12 Parent company business activity

Not applicable.

C.13 Other persons drawing up the crypto-asset white paper according to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114

Crypto Risk Metrics GmbH, Lange Reihe 73, 20099 Hamburg

C.14 Reason for drawing the white paper by persons referred to in Article 6(1), second subparagraph, of Regulation (EU) 2023/1114

Crypto Risk Metrics GmbH, Lange Reihe 73, 20099 Hamburg, was mandated to support the process of drawing up the white paper by the token issuer mentioned in Part A.

Part D - Information about the crypto-asset project

D.1 Crypto-asset project name

Long Name: Sahara Al, Short Name: SAHARA according to the Digital Token Identifier Foundation (www.dtif.org, DTI see F.13, FFG DTI see F.14 as of 2025-08-16).

D.2 Crypto-assets name

See F.13.

D.3 Abbreviation

See F.13.

D.4 Crypto-asset project description

Sahara AI is a project positioned at the intersection of artificial intelligence and blockchain technology. It aims to create an ecosystem where decentralized infrastructure supports AI model training, deployment, and access to data resources. The project references the use of blockchain networks for coordination and token-based incentives to encourage participation in the ecosystem.

The SAHARA token is presented as an element within this framework, with intended uses such as facilitating access to Al-related services, compensating contributors, and enabling transactions within the ecosystem. However, no binding commitments regarding governance rights, profit participation, equity entitlements, or guaranteed functionality are established. The actual scope of adoption and utility remains dependent on the further development of the project, third-party integrations, and community participation, without enforceable assurances as to its long-term viability or economic value.

D.5 Details of all natural or legal persons involved in the implementation of the cryptoasset project

Name	Function	Business address
Sahara Company (BVI) Ltd	Issuer	VG Craigmuir Chambers, Road Town, Tortola, VG 1110

Sahara Foundation	Parent of Issuer	KY P. O. Box 10240, 4th Floor, Harbour Place, 103 South Church Street, George Town, Grand Cayman KY1-1002
Sahara Labs Ltd	Development Company, a core contributor of Sahara Al	KY – Suite 3119, 9 Forum Lane, Camana Bay, PO Box 144, George Town, Grand Cayman KY1-9006
Sarah Wheeler	Director of Sahara Foundation	KY P. O. Box 10240, 4th Floor, Harbour Place, 103 South Church Street, George Town, Grand Cayman KY1-1002
Investors	The project has secured participation from external investors, who have provided funding to support its development (can be found here: https://saharaai.com/).	Not applicable.

D.6 Utility Token Classification

The token does not classify as a utility token.

D.7 Key Features of Goods/Services for Utility Token Projects

Not applicable.

D.8 Plans for the token

The issuer has published a roadmap on its official platform (https://saharaai.com/, accessed on 2025-08-16), which outlines intended stages for the development of the Sahara AI ecosystem.

Initial phases have focused on concept design, ecosystem formation, and the integration of Al-related infrastructure. Subsequent milestones reference activities such as expanding technical capabilities, onboarding contributors, and fostering community participation. Future phases are presented in general terms, including broader ecosystem growth, the refinement of Al tools, and potential collaborations with external partners.

In addition, the roadmap refers to a future plan to launch a proprietary mainnet, on which the SAHARA token is intended to function as the native token of the network. This would conceptually shift the token from being implemented through existing blockchain infrastructure to a protocol-level role within a dedicated ledger. However, this transition remains at a planning stage, and no assurances can be made regarding timing, technical feasibility, or the ultimate implementation. Furthermore, references have been made to the possibility of introducing governance rights in the future The potential effects of such a development on token holders are not clearly defined, and any linkage between the mainnet launch and the token's economic value or utility is uncertain.

It must be emphasized that this roadmap is indicative only and subject to change at any time. Past milestones have not necessarily been implemented as described, and future steps may be delayed, modified, or cancelled entirely. The issuer has not provided binding commitments, and there can be no guarantee that the outlined plans will materialize as stated. Moreover, the precise impact of these developments on the SAHARA token is uncertain, as changes in the ecosystem may not necessarily correspond to increased utility, demand, or value of the token.

D.9 Resource allocation

According to publicly available information (https://docs.saharaai.com/tokenomics, accessed on 2025-08-16), the allocation of SAHARA tokens is distributed across several categories. The largest portion, approximately 33.93%, is designated for ecosystem development, with the stated aim of supporting technical growth and project expansion. Community incentives account for around 20.75%, intended to encourage engagement and activity within the network. Early backers are allocated about 19.75%, while 15% is assigned to the core team and contributors. Smaller allocations include airdrops (8.15%), liquidity and market stability measures (1.0%), and Buidlpad community

distribution (1.42%). The effective circulating supply may fluctuate over time due to

vesting schedules, unlocking mechanisms, release structures, or other project-specific

adjustments.

The temporary token distribution can be traced on-chain, on Ethereum:

https://etherscan.io/token/0xFDFfB411C4A70AA7C95D5C981a6Fb4Da867e1111#balan

ces and on BNB Smart Chain: https://bscscan.com/token/0xfdffb411c4a70aa7-

c95d5c981a6fb4da867e1111#balances.

The investor must be aware that a public address cannot necessarily be assigned to a

single person or entity, which limits the ability to determine exact economic influence or

future actions. Token distribution changes can negatively impact the investor.

D.10 Planned use of Collected funds or crypto-Assets

Not applicable, as this white paper was drawn up for the admission to trading and not

for collecting funds for the crypto-asset-project.

Part E – Information about the offer to the public of crypto-assets

or their admission to trading

E.1 Public offering or admission to trading

The white paper concerns the admission to trading (i. e. ATTR).

E.2 Reasons for public offer or admission to trading

The crypto asset is to be listed on the platforms: Bitvavo B.V. Additional platforms aren't

excluded in the future.

E.3 Fundraising target

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.4 Minimum subscription goals

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

FFG: 4PS1S77QG - 2025-08-22

E.5 Maximum subscription goals

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.6 Oversubscription acceptance

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.7 Oversubscription allocation

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.8 Issue price

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.9 Official currency or any other crypto-assets determining the issue price

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.10 Subscription fee

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.11 Offer price determination method

Once the token is admitted to trading its price will be determined by demand (buyers)

and supply (sellers).

E.12 Total number of offered/traded crypto-assets

A total amount of 10,000,000,000 tokens has been initially minted on Ethereum (see

https://etherscan.io/tx/0x6dfbb79d90f03cf8419c2d01dc46a2e24eafc7320a7596129566

28fd173542a9, accessed 2025-08-016). It has to be noted that SAHARA is not only on

the Ethereum mainnet but also on BNB Smart Chain:

https://bscscan.com/tx/0xa513ab7c620b405598ef9f6ac0cbd3518a203a74c2c5277592

9aa64c279592bd.

The dependency on multiple ecosystems can negatively impact investors. This asset

bridge creates corresponding risks for investors, as this lock-in mechanism may not

function properly for technical reasons or may be subject to attack.

E.13 Targeted holders

ALL

E.14 Holder restrictions

The Holder restrictions are subject to the rules applicable to the Crypto Asset Service

Provider as well as additional restrictions the Crypto Asset Service Providers might set in

force.

E.15 Reimbursement notice

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.16 Refund mechanism

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.17 Refund timeline

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.18 Offer phases

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.19 Early purchase discount

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.20 Time-limited offer

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.21 Subscription period beginning

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.22 Subscription period end

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.23 Safeguarding arrangements for offered funds/crypto- Assets

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.24 Payment methods for crypto-asset purchase

The payment methods are subject to the respective capabilities of the Crypto Asset

Service Provider listing the crypto-asset.

E.25 Value transfer methods for reimbursement

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.26 Right of withdrawal

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.27 Transfer of purchased crypto-assets

The transfer of purchased crypto-assets are subject to the respective capabilities of the

Crypto Asset Service Provider listing the crypto-asset.

E.28 Transfer time schedule

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

FFG: 4PS1S77QG - 2025-08-22

E.29 Purchaser's technical requirements

The technical requirements that the purchaser is required to fulfil to hold the crypto-

assets of purchased crypto-assets are subject to the respective capabilities of the

Crypto Asset Service Provider listing the crypto-asset.

E.30 Crypto-asset service provider (CASP) name

Not applicable.

E.31 CASP identifier

Not applicable.

E.32 Placement form

Not applicable.

E.33 Trading platforms name

Bitvavo B.V.

Other platforms are also planned for future listing.

E.34 Trading platforms Market identifier code (MIC)

Bitvavo B.V.: VAVO

Other platforms are also planned for future listing.

E.35 Trading platforms access

This depends on the trading platform listing the asset.

E.36 Involved costs

This depends on the trading platform listing the asset. Furthermore, costs may occur for

making transfers out of the platform (i. e. "gas costs" for blockchain network use that

may exceed the value of the crypto-asset itself).

E.37 Offer expenses

Not applicable, as this crypto-asset white paper concerns the admission to trading and

24

not the offer of the token to the public.

E.38 Conflicts of interest

MiCAR-compliant Crypto Asset Service Providers shall have strong measurements in

place in order to manage conflicts of interests. Due to the broad audience this white-

paper is adressing, potential investors should always check the conflicts of Interest

policy of their respective counterparty.

E.39 Applicable law

Not applicable, as it is referred to on "offer to the public" and in this white-paper, the

admission to trading is sought.

E.40 Competent court

Not applicable, as it is referred to on "offer to the public" and in this white-paper, the

admission to trading is sought.

Part F - Information about the crypto-assets

F.1 Crypto-asset type

The crypto-asset described in the white paper is classified as a crypto-asset under the

Markets in Crypto-Assets Regulation (MiCAR) but does not qualify as an electronic

money token (EMT) or an asset-referenced token (ART). It is a digital representation of

value that can be stored and transferred using distributed ledger technology (DLT) or

similar technology, without embodying or conferring any rights to its holder.

The asset does not aim to maintain a stable value by referencing an official currency, a

basket of assets, or any other underlying rights. Instead, its valuation is entirely market-

driven, based on supply and demand dynamics, and not supported by a stabilization

mechanism. It is neither pegged to any fiat currency nor backed by any external assets,

distinguishing it clearly from EMTs and ARTs.

Furthermore, the crypto-asset is not categorized as a financial instrument, deposit,

insurance product, pension product, or any other regulated financial product under EU

law. It does not grant financial rights, voting rights, or any contractual claims to its

holders, ensuring that it remains outside the scope of regulatory frameworks applicable

to traditional financial instruments.

FFG: 4PS1S77QG - 2025-08-22

F.2 Crypto-asset functionality

The SAHARA tokens are presented as an intended asset within the Sahara Al ecosystem.

It is described as being used to facilitate access to Al-related services, support

transactions within the network, and compensate contributors. Among the functions

referenced by the issuer are the possibility of rewarding participants in data-related

tasks on the platform with SAHARA, as well as the introduction of staking mechanisms

as part of ecosystem participation. In the longer term, the issuer has indicated that the

token may serve as the native asset of a planned proprietary mainnet. At present,

however, these functions remain at a conceptual and developmental stage, and no

assurance can be given as to whether or when they will be implemented.

Outside of these intended ecosystem functions, the SAHARA token currently operates

as a transferable and tradable digital asset on compatible blockchain infrastructure. The

token does not provide governance rights, profit participation, redemption claims, or

equity interests, and no binding commitments regarding staking, rewards, or

guaranteed utility have been confirmed. Its observable use is therefore limited to

transferability and trading, while any broader functional role within the Sahara Al

network is dependent on future developments that remain uncertain.

F.3 Planned application of functionalities

See D.8.

A description of the characteristics of the crypto asset, including the

data necessary for classification of the crypto-asset white paper in the

register referred to in Article 109 of Regulation (EU) 2023/1114, as

specified in accordance with paragraph 8 of that Article

F.4 Type of crypto-asset white paper

The white paper type is "other crypto-assets" (i. e. "OTHR").

F.5 The type of submission

The white paper submission type is "NEWT", which stands for new token.

FFG: 4PS1S77QG - 2025-08-22

F.6 Crypto-asset characteristics

The tokens are crypto-assets other than EMTs and ARTs, which are available on the Ethereum and BNB Smart Chain blockchain. The tokens are fungible (up to 18 digits after the decimal point), and a total of 10,000,000,000 have already been issued. The tokens are a digital representation of value, and have no inherent rights attached as well as no intrinsic utility.

F.7 Commercial name or trading name

See F.13.

F.8 Website of the issuer

https://saharaai.com/

F.9 Starting date of offer to the public or admission to trading

2025-09-19

F.10 Publication date

2025-09-19

F.11 Any other services provided by the issuer

It is not possible to exclude a possibility that the issuer of the token provides or will provide other services not covered by Regulation (EU) 2023/1114 (i.e. MiCAR).

F.12 Language or languages of the crypto-asset white paper

ΕN

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

QXVT6R1PP; 2M221L80D

F.14 Functionally fungible group digital token identifier, where available

4PS1S77QG

F.15 Voluntary data flag

Mandatory.

F.16 Personal data flag

The white paper does contain personal data.

F.17 LEI eligibility

The issuer should be eligible for a Legal Entity Identifier.

F.18 Home Member State

Netherlands

F.19 Host Member States

Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland,

France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta,

Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden

Part G - Information on the rights and obligations attached to the

crypto-assets

G.1 Purchaser rights and obligations

There are no rights or obligations attached for/of the purchaser.

G.2 Exercise of rights and obligations

As the token grants neither rights nor obligations, there are no procedures and

conditions for the exercise of these rights applicable.

G.3 Conditions for modifications of rights and obligations

As the token grants neither rights nor obligations, there are no conditions under which

the rights and obligations may be modified applicable. An adjustment of the technical

infrastructure necessary to exercise the promised governance rights, declining

functionality due to dilution, changing rights within the voting platforms, and all other

adverse effects for investors may occur at any time.

G.4 Future public offers

This white paper refers to admission to trading. The issuer reserves the right to make

further offers in the future. This means that future public offers cannot be ruled out.

FFG: 4PS1S77QG - 2025-08-22

The exact conditions and legal classification for this have not yet been defined. This may

have negative consequences for investors at any time.

G.5 Issuer retained crypto-assets

According to publicly available information (https://docs.saharaai.com/tokenomics,

accessed on 2025-08-16), the allocation of SAHARA tokens is distributed across several

categories. The largest portion, approximately 33.93%, is designated for ecosystem

development, with the stated aim of supporting technical growth and project expansion.

Community incentives account for around 20.75%, intended to encourage engagement

and activity within the network. Early backers are allocated about 19.75%, while 15% is

assigned to the core team and contributors. Smaller allocations include airdrops

(8.15%), liquidity and market stability measures (1.0%), and Buidlpad community

distribution (1.42%). The effective circulating supply may fluctuate over time due to

vesting schedules, unlocking mechanisms, release structures, or other project-specific

adjustments.

A significant portion of the supply, at least approximately 34.75%, is attributable directly

or indirectly to the issuer and related parties (early backers, core team, and

contributors) and should be considered issuer-retained.

The temporary token distribution can be traced on-chain, on Ethereum:

https://etherscan.io/token/0xFDFfB411C4A70AA7C95D5C981a6Fb4Da867e1111#balan

ces and on BNB Smart Chain: https://bscscan.com/token/0xfdffb411c4a70aa7c95d5c-

981a6fb4da867e1111#balances.

The investor must be aware that a public address cannot necessarily be assigned to a

single person or entity, which limits the ability to determine exact economic influence or

29

future actions. Token distribution changes can negatively impact the investor.

G.6 Utility token classification

No

G.7 Key features of goods/services of utility tokens

Not applicable.

G.8 Utility tokens redemption

Not applicable.

G.9 Non-trading request

The admission to trading is sought.

G.10 Crypto-assets purchase or sale modalities

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

G.11 Crypto-assets transfer restrictions

The crypto-assets as such do not have any transfer restrictions and are generally freely

transferable. The Crypto Asset Service Providers can impose their own restrictions in

agreements they enter with their clients. The Crypto Asset Service Providers may

impose restrictions to buyers and sellers in accordance with applicable laws and internal

policies and terms.

G.12 Supply adjustment protocols

No, there are no fixed protocols that can increase or decrease the supply implemented

as of 2025-08-16. Nevertheless, it is possible that the owner of the smart-contract has

the ability to increase or decrease the token-supply in response to changes in demand.

Also, it is possible to decrease the circulating supply, by transferring crypto-assets to so

called "burn-adresses", which are adresses that render the crypto-asset "non-

transferable" after sent to those adresses.

G.13 Supply adjustment mechanisms

The mint authority (the entity who can create new tokens of that crypto-asset), has the

potential right to change the supply of the crypto-assets. Several third parties confirm

that the maximum supply is capped at the maximum of 10,000,000,000 (e.g.:

https://www.binance.com/en/support/announcement/detail/c50d3bc55dc34b2984703b

70aa344446, accessed 2028-08-18). Other third-party sources also indicate a capped

maximum supply equal to the number of tokens minted (see e.g.

https://coinmarketcap.com/currencies/sahara-ai/ or both block explorers, accessed

FFG: 4PS1S77QG - 2025-08-22

2025-08-16). Investors should note that changes in the token supply can have a

negative impact.

G.14 Token value protection schemes

No, the token does not have value protection schemes.

G.15 Token value protection schemes description

Not applicable.

G.16 Compensation schemes

No, the token does not have compensation schemes.

G.17 Compensation schemes description

Not applicable.

G.18 Applicable law

Applicable law likely depends on the location of any particular transaction with the

token.

G.19 Competent court

Competent court likely depends on the location of any particular transaction with the

token.

Part H - information on the underlying technology

H.1 Distributed ledger technology (DTL)

See F.13.

H.2 Protocols and technical standards

The crypto asset that is the subject of this white paper is available on multiple DLT

networks. These include: Ethereum and BNB Smart Chain. In general, when evaluating

crypto assets, the total number of tokens issued across different networks must always

be taken into account, as spillover effects can be adverse for investors.

The following applies to Ethereum:

The crypto-asset operates on a well-defined set of protocols and technical standards

that are intended to ensure its security, decentralization, and functionality. It is running

on the Ethereum blockchain. Below are some of the key ones:

1. Network Protocols

The crypto-asset follows a decentralized, peer-to-peer (P2P) protocol where nodes

communicate over the crypto-asset's DevP2P protocol using RLPx for data encoding.

- Transactions and smart contract execution are secured through Proof-of-Stake (PoS)

consensus.

- Validators propose and attest blocks in Ethereum's Beacon Chain, finalized through

Casper FFG.

- The Ethereum Virtual Machine (EVM) executes smart contracts using Turing-complete

bytecode.

2. Transaction and Address Standards

crypto-asset Address Format: 20-byte addresses derived from Keccak-256 hashing of

public keys.

Transaction Types:

- Legacy Transactions (pre-EIP-1559)

- Type 0 (Pre-EIP-1559 transactions)

- Type 1 (EIP-2930: Access list transactions)

- Type 2 (EIP-1559: Dynamic fee transactions with base fee burning)

The Pectra upgrade introduces EIP-7702, a transformative improvement to account

abstraction. This allows externally owned accounts (EOAs) to temporarily act as smart

contract wallets during a transaction. It provides significant flexibility, enabling

functionality such as sponsored gas payments and batched operations without

changing the underlying account model permanently.

3. Blockchain Data Structure & Block Standards

FFG: 4PS1S77QG - 2025-08-22

- the crypto-asset's blockchain consists of accounts, smart contracts, and storage states,

maintained through Merkle Patricia Trees for efficient verification.

Each block contains:

- Block Header: Parent hash, state root, transactions root, receipts root, timestamp, gas

limit, gas used, proposer signature.

- Transactions: Smart contract executions and token transfers.

- Block Size: No fixed limit; constrained by the gas limit per block (variable over time). In

line with Ethereum's scalability roadmap, Pectra includes EIP-7691, which increases the

maximum number of "blobs" (data chunks introduced with EIP-4844) per block. This

change significantly boosts the data availability layer used by rollups, supporting

cheaper and more efficient Layer 2 scalability.

4. Upgrade & Improvement Standards

Ethereum follows the Ethereum Improvement Proposal (EIP) process for upgrades.

The following applies to BNB Smart Chain:

Binance Smart Chain (BSC) is a Layer-1 blockchain that utilizes a Proof-of-Staked

Authority (PoSA) consensus mechanism. This mechanism combines elements of Proof-

of-Authority (PoA) and Proof-of-Stake (PoS) and is intended to secure the network and

validate transactions. In PoSA, validators are selected based on their stake and

authority, with the goal of providing fast transaction times and low fees while

maintaining network security through staking.

H.3 Technology used

The crypto asset that is the subject of this white paper is available on multiple DLT

networks. These include: Ethereum and BNB Smart Chain. In general, when evaluating

crypto assets, the total number of tokens issued across different networks must always

be taken into account, as spillover effects can be adverse for investors.

The following applies to Ethereum:

FFG: 4PS1S77QG - 2025-08-22

1. Decentralized Ledger: The Ethereum blockchain acts as a decentralized ledger for all

token transactions, with the intention to preserving an unalterable record of token

transfers and ownership to ensure both transparency and security.

2. Private Key Management: To safeguard their token holdings, users must securely

store their wallet's private keys and recovery phrases.

3. Cryptographic Integrity: Ethereum employs elliptic curve cryptography to validate and

execute transactions securely, intended to ensure the integrity of all transfers. The

Keccak-256 (SHA-3 variant) Hashing Algorithm is used for hashing and address

generation. The crypto-asset uses ECDSA with secp256k1 curve for key generation and

digital signatures. Next to that, BLS (Boneh-Lynn-Shacham) signatures are used for

validator aggregation in PoS.

The following applies to BNB Smart Chain:

1. BSC-Compatible Wallets

Tokens on BSC are supported by wallets compatible with the Ethereum Virtual Machine

(EVM), such as MetaMask. These wallets can be configured to connect to the BSC

network and are designed to interact with BSC using standard Web3 interfaces.

2. Ledger

BSC maintains its own decentralized ledger for recording token transactions. This ledger

is intended to ensure transparency and security, providing a verifiable record of all

activities on the network.

3. BEP-20 Token Standard

BSC supports tokens implemented under the BEP-20 standard, which is tailored for the

BSC ecosystem. This standard is designed to facilitate the creation and management of

tokens on the network.

4. Scalability and Transaction Efficiency

FFG: 4PS1S77QG - 2025-08-22

BSC is designed to handle high volumes of transactions with low fees. It leverages its PoSA consensus mechanism to achieve fast transaction times and efficient network

performance, making it suitable for applications requiring high throughput.

H.4 Consensus mechanism

The crypto asset that is the subject of this white paper is available on multiple DLT networks. These include: Ethereum and BNB Smart Chain. In general, when evaluating crypto assets, the total number of tokens issued across different networks must always

be taken into account, as spillover effects can be adverse for investors.

The following applies to Ethereum:

The crypto-asset's Proof-of-Stake (PoS) consensus mechanism, introduced with The Merge in 2022, replaces mining with validator staking. Validators must stake at least 32 ETH every block a validator is randomly chosen to propose the next block. Once proposed the other validators verify the blocks integrity. The network operates on a slot and epoch system, where a new block is proposed every 12 seconds, and finalization occurs after two epochs (~12.8 minutes) using Casper-FFG. The Beacon Chain coordinates validators, while the fork-choice rule (LMD-GHOST) ensures the chain follows the heaviest accumulated validator votes. Validators earn rewards for proposing and verifying blocks, but face slashing for malicious behavior or inactivity. PoS aims to improve energy efficiency, security, and scalability, with future upgrades like Proto-

Danksharding enhancing transaction efficiency.

The following applies to BNB Smart Chain:

Binance Smart Chain (BSC) uses a hybrid consensus mechanism called Proof of Staked Authority (PoSA), which combines elements of Delegated Proof of Stake (DPoS) and Proof of Authority (PoA). This method ensures fast block times and low fees while maintaining a level of decentralization and security. Core Components 1. Validators (so-

called "Cabinet Members"): Validators on BSC are responsible for producing new blocks,

validating transactions, and maintaining the network's security. To become a validator, an entity must stake a significant amount of BNB (Binance Coin). Validators are selected through staking and voting by token holders. There are 21 active validators at any given time, rotating to ensure decentralization and security. 2. Delegators: Token holders who do not wish to run validator nodes can delegate their BNB tokens to validators. This delegation helps validators increase their stake and improves their chances of being selected to produce blocks. Delegators earn a share of the rewards that validators receive, incentivizing broad participation in network security. 3. Candidates: Candidates are nodes that have staked the required amount of BNB and are in the pool waiting to become validators. They are essentially potential validators who are not currently active but can be elected to the validator set through community voting. Candidates play a crucial role in ensuring there is always a sufficient pool of nodes ready to take on validation tasks, thus maintaining network resilience and decentralization. Consensus Process 4. Validator Selection: Validators are chosen based on the amount of BNB staked and votes received from delegators. The more BNB staked and votes received, the higher the chance of being selected to validate transactions and produce new blocks. The selection process involves both the current validators and the pool of candidates, ensuring a dynamic and secure rotation of nodes. 5. Block Production: The selected validators take turns producing blocks in a PoA-like manner, ensuring that blocks are generated quickly and efficiently. Validators validate transactions, add them to new blocks, and broadcast these blocks to the network. 6. Transaction Finality: BSC achieves fast block times of around 3 seconds and quick transaction finality. This is achieved through the efficient PoSA mechanism that allows validators to rapidly reach consensus. Security and Economic Incentives 7. Staking: Validators are required to stake a substantial amount of BNB, which acts as collateral to ensure their honest behavior. This staked amount can be slashed if validators act maliciously. Staking incentivizes validators to act in the network's best interest to avoid losing their staked BNB. 8. Delegation and Rewards: Delegators earn rewards proportional to their stake in validators. This incentivizes them to choose reliable validators and participate in the network's security. Validators and delegators share transaction fees as rewards, which provides continuous economic incentives to maintain network security and performance. 9. Transaction Fees: BSC employs low transaction fees, paid in BNB,

making it cost-effective for users. These fees are collected by validators as part of their rewards, further incentivizing them to validate transactions accurately and efficiently.

H.5 Incentive mechanisms and applicable fees

The crypto asset that is the subject of this white paper is available on multiple DLT networks. These include: Ethereum and BNB Smart Chain. In general, when evaluating crypto assets, the total number of tokens issued across different networks must always be taken into account, as spillover effects can be adverse for investors.

The following applies to Ethereum:

The crypto-asset's PoS system secures transactions through validator incentives and economic penalties. Validators stake at least 32 ETH and earn rewards for proposing blocks, attesting to valid ones, and participating in sync committees. Rewards are paid in newly issued ETH and transaction fees. Under EIP-1559, transaction fees consist of a base fee, which is burned to reduce supply, and an optional priority fee (tip) paid to validators. Validators face slashing if they act maliciously and incur penalties for inactivity. This system aims to increase security by aligning incentives while making the crypto-asset's fee structure more predictable and deflationary during high network activity.

The following applies to BNB Smart Chain:

Binance Smart Chain (BSC) uses the Proof of Staked Authority (PoSA) consensus mechanism to ensure network security and incentivize participation from validators and delegators. Incentive Mechanisms 1. Validators: Staking Rewards: Validators must stake a significant amount of BNB to participate in the consensus process. They earn rewards in the form of transaction fees and block rewards. Selection Process: Validators are selected based on the amount of BNB staked and the votes received from delegators. The more BNB staked and votes received, the higher the chances of being selected to validate transactions and produce new blocks. 2. Delegators: Delegated Staking: Token holders can delegate their BNB to validators. This delegation increases the validator's

total stake and improves their chances of being selected to produce blocks. Shared Rewards: Delegators earn a portion of the rewards that validators receive. This incentivizes token holders to participate in the network's security and decentralization by choosing reliable validators. 3. Candidates: Pool of Potential Validators: Candidates are nodes that have staked the required amount of BNB and are waiting to become active validators. They ensure that there is always a sufficient pool of nodes ready to take on validation tasks, maintaining network resilience. 4. Economic Security: Slashing: Validators can be penalized for malicious behavior or failure to perform their duties. Penalties include slashing a portion of their staked tokens, ensuring that validators act in the best interest of the network. Opportunity Cost: Staking requires validators and delegators to lock up their BNB tokens, providing an economic incentive to act honestly to avoid losing their staked assets. Fees on the Binance Smart Chain 5. Transaction Fees: Low Fees: BSC is known for its low transaction fees compared to other blockchain networks. These fees are paid in BNB and are essential for maintaining network operations and compensating validators. Dynamic Fee Structure: Transaction fees can vary based on network congestion and the complexity of the transactions. However, BSC ensures that fees remain significantly lower than those on the Ethereum mainnet. 6. Block Rewards: Incentivizing Validators: Validators earn block rewards in addition to transaction fees. These rewards are distributed to validators for their role in maintaining the network and processing transactions. 7. Cross-Chain Fees: Interoperability Costs: BSC supports cross-chain compatibility, allowing assets to be transferred between Binance Chain and Binance Smart Chain. These cross-chain operations incur minimal fees, facilitating seamless asset transfers and improving user experience. 8. Smart Contract Fees: Deployment and Execution Costs: Deploying and interacting with smart contracts on BSC involves paying fees based on the computational resources required. These fees are also paid in BNB and are designed to be cost-effective, encouraging developers to build on the BSC platform.

H.6 Use of distributed ledger technology

No, DLT not operated by the issuer, offeror, a person seeking admission to trading or a third-party acting on the issuer's their behalf.

38

H.7 DLT functionality description

Not applicable.

H.8 Audit

Since the question of "technology" is understood in a broad sense, the answer to the

question of whether an examination of the "technology used" has been carried out is

"no, we cannot guarantee that all parts of the technology used have been examined."

This is because this report focuses on risks and we cannot guarantee that every part of

the technology used has been examined.

H.9 Audit outcome

Not applicable.

Part I - Information on risks

I.1 Offer-related risks

1. Regulatory and Compliance

This white paper (drawn up from 2025-08-16) has been prepared with utmost caution;

however, uncertainties in the regulatory requirements and future changes in regulatory

frameworks could potentially impact the token's legal status and its tradability. There is

also a high probability that other laws will come into force, changing the rules for the

trading of the token. Therefore, such developments shall be monitored and acted upon

accordingly.

2. Operational and Technical

Blockchain Dependency: The token is entirely dependent on the blockchain the crypto-

asset is issued upon (as of 2025-08-16). Any issues, such as downtime, congestion, or

security vulnerabilities within the blockchain, could adversely affect the token's

functionality.

Smart Contract Risks: Smart contracts governing the token may contain hidden

vulnerabilities or bugs that could disrupt the token offering or distribution processes.

FFG: 4PS1S77QG - 2025-08-22

39

Connection Dependency: As the trading of the token also involves other trading venues,

technical risks such as downtime of the connection or faulty code are also possible.

Human errors: Due to the irrevocability of blockchain-transactions, approving wrong

transactions or using incorrect networks/addresses will most likely result in funds not

being accessibly anymore.

Custodial risk: When admitting the token to trading, the risk of losing clients assets due

to hacks or other malicious acts is given. This is due to the fact the token is hold in

custodial wallets for the customers.

3. Market and Liquidity

Volatility: The token will most likely be subject to high volatility and market speculation.

Price fluctuations could be significant, posing a risk of substantial losses to holders.

Liquidity Risk: Liquidity is contingent upon trading activity levels on decentralized

exchanges (DEXs) and potentially on centralized exchanges (CEXs), should they be

involved. Low trading volumes may restrict the buying and selling capabilities of the

tokens.

4. Counterparty

As the admission to trading involves the connection to other trading venues,

counterparty risks arise. These include, but are not limited to, the following risks:

General Trading Platform Risk: The risk of trading platforms not operating to the highest

standards is given. Examples like FTX show that especially in nascent industries,

compliance and oversight-frameworks might not be fully established and/or enforced.

Listing or Delisting Risks: The listing or delisting of the token is subject to the trading

partners internal processes. Delisting of the token at the connected trading partners

could harm or completely halt the ability to trade the token.

5. Liquidity

Liquidity of the token can vary, especially when trading activity is limited. This could

result in high slippage when trading a token.

6. Failure of one or more Counterparties

Another risk stems from the internal operational processes of the counterparties used. As there is no specific oversight other than the typical due diligence check, it cannot be

guaranteed that all counterparties adhere to the best market standards.

Bankruptcy Risk: Counterparties could go bankrupt, possibly resulting in a total loss for the clients assets hold at that counterparty.

7. Information asymmetry

Different groups of participants may not have the same access to technical details or governance information, leading to uneven decision-making and potential disadvantages for less informed investors.

I.2 Issuer-related risks

1. Insolvency

As with every other commercial endeavor, the risk of insolvency of the issuer is given. This could be caused by but is not limited to lack of interest from the public, lack of funding, incapacitation of key developers and project members, force majeure (including pandemics and wars) or lack of commercial success or prospects.

2. Counterparty

In order to operate, the issuer has most likely engaged in different business relationships with one or more third parties on which it strongly depends on. Loss or changes in the leadership or key partners of the issuer and/or the respective counterparties can lead to disruptions, loss of trust, or project failure. This could result in a total loss of economic value for the crypto-asset holders.

3. Legal and Regulatory Compliance

Cryptocurrencies and blockchain-based technologies are subject to evolving regulatory landscapes worldwide. Regulations vary across jurisdictions and may be subject to significant changes. Non-compliance can result in investigations, enforcement actions, penalties, fines, sanctions, or the prohibition of the trading of the crypto-asset impacting its viability and market acceptance. This could also result in the issuer to be subject to private litigation. The beforementioned would most likely also lead to changes with

respect to trading of the crypto-asset that may negatively impact the value, legality, or

functionality of the crypto-asset.

4. Operational

Failure to develop or maintain effective internal control, or any difficulties encountered

in the implementation of such controls, or their improvement could harm the issuer's

business, causing disruptions, financial losses, or reputational damage.

5. Industry

The issuer is and will be subject to all of the risks and uncertainties associated with a

crypto-project, where the token issued has zero intrinsic value. History has shown that

most of this projects resulted in financial losses for the investors and were only set-up

to enrich a few insiders with the money from retail investors.

6. Reputational

The issuer faces the risk of negative publicity, whether due to, without limitation,

operational failures, security breaches, or association with illicit activities, which can

damage the issuer reputation and, by extension, the value and acceptance of the

crypto-asset.

7. Competition

There are numerous other crypto-asset projects in the same realm, which could have an

effect on the crypto-asset in question.

8. Unanticipated Risk

In addition to the risks included in this section, there might be other risks that cannot be

foreseen. Additional risks may also materialize as unanticipated variations or

combinations of the risks discussed.

I.3 Crypto-assets-related risks

1. Valuation

As the crypto-asset does not have any intrinsic value, and grants neither rights nor

obligations, the only mechanism to determine the price is supply and demand.

Historically, most crypto-assets have dramatically lost value and were not a beneficial

investment for the investors. Therefore, investing in these crypto-assets poses a high

risk, and the loss of funds can occur.

2. Market Volatility

Crypto-asset prices are highly susceptible to dramatic fluctuations influence by various

factors, including market sentiment, regulatory changes, technological advancements,

and macroeconomic conditions. These fluctuations can result in significant financial

losses within short periods, making the market highly unpredictable and challenging for

investors. This is especially true for crypto-assets without any intrinsic value, and

investors should be prepared to lose the complete amount of money invested in the

respective crypto-assets.

3. Liquidity Challenges

Some crypto-assets suffer from limited liquidity, which can present difficulties when

executing large trades without significantly impacting market prices. This lack of liquidity

can lead to substantial financial losses, particularly during periods of rapid market

movements, when selling assets may become challenging or require accepting

unfavorable prices.

4. Asset Security

Crypto-assets face unique security threats, including the risk of theft from exchanges or

digital wallets, loss of private keys, and potential failures of custodial services. Since

crypto transactions are generally irreversible, a security breach or mismanagement can

result in the permanent loss of assets, emphasizing the importance of strong security

measures and practices.

5. Scams

The irrevocability of transactions executed using blockchain infrastructure, as well as the

pseudonymous nature of blockchain ecosystems, attracts scammers. Therefore,

investors in crypto-assets must proceed with a high degree of caution when investing in

if they invest in crypto-assets. Typical scams include - but are not limited to - the

creation of fake crypto-assets with the same name, phishing on social networks or by

email, fake giveaways/airdrops, identity theft, among others.

FFG: 4PS1S77QG - 2025-08-22

43

6. Blockchain Dependency

Any issues with the blockchain used, such as network downtime, congestion, or security vulnerabilities, could disrupt the transfer, trading, or functionality of the crypto-asset.

7. Smart Contract Vulnerabilities

The smart contract used to issue the crypto-asset could include bugs, coding errors, or vulnerabilities which could be exploited by malicious actors, potentially leading to asset loss, unauthorized data access, or unintended operational consequences.

8. Privacy Concerns

All transactions on the blockchain are permanently recorded and publicly accessible, which can potentially expose user activities. Although addresses are pseudonoymous, the transparent and immutable nature of blockchain allows for advanced forensic analysis and intelligence gathering. This level of transparency can make it possible to link blockchain addresses to real-world identities over time, compromising user privacy.

9. Regulatory Uncertainty

The regulatory environment surrounding crypto-assets is constantly evolving, which can directly impact their usage, valuation, and legal status. Changes in regulatory frameworks may introduce new requirements related to consumer protection, taxation, and anti-money laundering compliance, creating uncertainty and potential challenges for investors and businesses operating in the crypto space. Although the crypto-asset do not create or confer any contractual or other obligations on any party, certain regulators may nevertheless qualify the crypto-asset as a security or other financial instrument under their applicable law, which in turn would have drastic consequences for the crypto-asset, including the potential loss of the invested capital in the asset. Furthermore, this could lead to the sellers and its affiliates, directors, and officers being obliged to pay fines, including federal civil and criminal penalties, or make the crypto-asset illegal or impossible to use, buy, or sell in certain jurisdictions. On top of that, regulators could take action against the issuer as well as the trading platforms if the the regulators view the token as an unregistered offering of securities or the operations otherwise as a violation of existing law. Any of these outcomes would negatively affect

the value and/or functionality of the crypot-asset and/or could cause a complete loss of funds of the invested money in the crypto-asset for the investor.

10. Counterparty risk

Engaging in agreements or storing crypto-assets on exchanges introduces counterparty risks, including the failure of the other party to fulfill their obligations. Investors may face potential losses due to factors such as insolvency, regulatory non-compliance, or fraudulent activities by counterparties, highlighting the need for careful due diligence when engaging with third parties.

11. Reputational concerns

Crypto-assets are often subject to reputational risks stemming from associations with illegal activities, high-profile security breaches, and technological failures. Such incidents can undermine trust in the broader ecosystem, negatively affecting investor confidence and market value, thereby hindering widespread adoption and acceptance.

12. Technological Innovation

New technologies or platforms could render the network's design less competitive or even break fundamental parts (i.e., quantum computing might break cryptographic algorithms used to secure the network), impacting adoption and value. Participants should approach the crypto-asset with a clear understanding of its speculative and volatile nature and be prepared to accept these risks and bear potential losses, which could include the complete loss of the asset's value.

13. Community and Narrative

As the crypto-asset has no intrinsic value, all trading activity is based on the intended market value is heavily dependent on its community.

14. Interest Rate Change

Historically, changes in interest, foreign exchange rates, and increases in volatility have increased credit and market risks and may also affect the value of the crypto-asset. Although historic data does not predict the future, potential investors should be aware that general movements in local and other factors may affect the market, and this could

also affect market sentiment and, therefore most likely also the price of the crypto-

asset.

15. Taxation

The taxation regime that applies to the trading of the crypto-asset by individual holders

or legal entities will depend on the holder's jurisdiction. It is the holder's sole

responsibility to comply with all applicable tax laws, including, but not limited to, the

reporting and payment of income tax, wealth tax, or similar taxes arising in connection

with the appreciation and depreciation of the crypto-asset.

16. Anti-Money Laundering/Counter-Terrorism Financing

It cannot be ruled out that crypto-asset wallet addresses interacting with the crypto-

asset have been, or will be used for money laundering or terrorist financing purposes,

or are identified with a person known to have committed such offenses.

17. Market Abuse

It is noteworthy that crypto-assets are potentially prone to increased market abuse

risks, as the underlying infrastructure could be used to exploit arbitrage opportunities

through schemes such as front-running, spoofing, pump-and-dump, and fraud across

different systems, platforms, or geographic locations. This is especially true for crypto-

assets with a low market capitalization and few trading venues, and potential investors

should be aware that this could lead to a total loss of the funds invested in the crypto-

asset.

18. Timeline and Milestones

Critical project milestones could be delayed by technical, operational, or market

challenges.

19. Legal ownership: Depending on jurisdiction, token holders may not have

enforceable legal rights over their holdings, limiting avenues for recourse in disputes or

cases of fraud.

20. Jurisdictional blocking: Access to exchanges, wallets, or interfaces may be restricted

based on user location or regulatory measures, even if the token remains transferable

on-chain.

21. Token concentration: A large proportion of tokens held by a few actors could allow

price manipulation, governance dominance, or sudden sell-offs impacting market

stability.

22. Ecosystem incentive misalignment: If validator, developer, or user rewards become

unattractive or distorted, network security and participation could decline.

23. Governance deadlock: Poorly structured or fragmented governance processes may

prevent timely decisions, creating delays or strategic paralysis.

24. Compliance misalignment: Features or delivery mechanisms may unintentionally

conflict with evolving regulations, particularly regarding consumer protection or data

privacy.

I.4 Project implementation-related risks

As this white paper relates to the "Admission to trading" of the crypto-asset, the

implementation risk is referring to the risks on the Crypto Asset Service Providers side.

These can be, but are not limited to, typical project management risks, such as key-

personal-risks, timeline-risks, and technical implementation-risks.

I.5 Technology-related risks

As this white paper relates to the "Admission to trading" of the crypto-asset, the

technology-related risks mainly involve the DLT networks where the crypto asset is

issued in.

1. Blockchain Dependency Risks

Network Downtime: Potential outages or congestion on the involved blockchains could

interrupt on-chain token transfers, trading, and other functions.

2. Smart Contract Risks

Vulnerabilities: The smart contract governing the token could contain bugs or

vulnerabilities that may be exploited, affecting token distribution or vesting schedules.

3. Wallet and Storage Risks

Private Key Management: Token holders must securely manage their private keys and recovery phrases to prevent permanent loss of access to their tokens, which includes Trading-Venues, who are a prominent target for dedicated hacks.

Compatibility Issues: The tokens require compatible wallets for storage and transfer. Any incompatibility or technical issues with these wallets could impact token accessibility.

4. Network Security Risks

Attack Risks: The blockchains may face threats such as denial-of-service (DoS) attacks or exploits targeting its consensus mechanism, which could compromise network integrity.

Centralization Concerns: Although claiming to be decentralized, the relatively smaller number of validators/concentration of stakes within the networks compared to other blockchains might pose centralization risks, potentially affecting network resilience.

- 5. Evolving Technology Risks: Technological Obsolescence: The fast pace of innovation in blockchain technology may make the used token standard appear less competitive or become outdated, potentially impacting the usability or adoption of the token.
- 6. Bridges: The dependency on multiple ecosystems can negatively impact investors. This asset bridge creates corresponding risks for investors, as this lock-in mechanism may not function properly for technical reasons or may be subject to attack. In that case, the supply may change immediately or the ownership rights to tokens may be changed.
- 7. Forking risk: Network upgrades may split the blockchain into separate versions, potentially creating duplicate tokens or incompatibility between different versions of the protocol.
- 8. Economic abstraction: Mechanisms such as gas relayers or wrapped tokens may allow users to bypass the native asset, reducing its direct demand and weakening its economic role.
- 9. Dust and spam attacks: Low-value transactions may flood the network, increasing ledger size, reducing efficiency, and exposing user addresses to tracking.
- 10. Frontend dependency: If users rely on centralised web interfaces or wallets, service outages or compromises could block access even if the blockchain itself continues to operate.

I.6 Mitigation measures

None.

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

S.1 Name

Sahara Company (BVI) Ltd

S.2 Relevant legal entity identifier

Not available.

S.3 Name of the cryptoasset

Sahara Al

S.4 Consensus Mechanism

The crypto asset that is the subject of this white paper is available on multiple DLT networks. These include: Ethereum and BNB Smart Chain. In general, when evaluating crypto assets, the total number of tokens issued across different networks must always be taken into account, as spillover effects can be adverse for investors.

The following applies to Ethereum:

The crypto-asset's Proof-of-Stake (PoS) consensus mechanism, introduced with The Merge in 2022, replaces mining with validator staking. Validators must stake at least 32 ETH every block a validator is randomly chosen to propose the next block. Once proposed the other validators verify the blocks integrity. The network operates on a slot and epoch system, where a new block is proposed every 12 seconds, and finalization occurs after two epochs (~12.8 minutes) using Casper-FFG. The Beacon Chain coordinates validators, while the fork-choice rule (LMD-GHOST) ensures the chain follows the heaviest accumulated validator votes. Validators earn rewards for proposing

and verifying blocks, but face slashing for malicious behavior or inactivity. PoS aims to improve energy efficiency, security, and scalability, with future upgrades like Proto-Danksharding enhancing transaction efficiency.

The following applies to BNB Smart Chain:

Binance Smart Chain (BSC) uses a hybrid consensus mechanism called Proof of Staked Authority (PoSA), which combines elements of Delegated Proof of Stake (DPoS) and Proof of Authority (PoA). This method ensures fast block times and low fees while maintaining a level of decentralization and security. Core Components 1. Validators (socalled "Cabinet Members"): Validators on BSC are responsible for producing new blocks, validating transactions, and maintaining the network's security. To become a validator, an entity must stake a significant amount of BNB (Binance Coin). Validators are selected through staking and voting by token holders. There are 21 active validators at any given time, rotating to ensure decentralization and security. 2. Delegators: Token holders who do not wish to run validator nodes can delegate their BNB tokens to validators. This delegation helps validators increase their stake and improves their chances of being selected to produce blocks. Delegators earn a share of the rewards that validators receive, incentivizing broad participation in network security. 3. Candidates: Candidates are nodes that have staked the required amount of BNB and are in the pool waiting to become validators. They are essentially potential validators who are not currently active but can be elected to the validator set through community voting. Candidates play a crucial role in ensuring there is always a sufficient pool of nodes ready to take on validation tasks, thus maintaining network resilience and decentralization. Consensus Process 4. Validator Selection: Validators are chosen based on the amount of BNB staked and votes received from delegators. The more BNB staked and votes received, the higher the chance of being selected to validate transactions and produce new blocks. The selection process involves both the current validators and the pool of candidates, ensuring a dynamic and secure rotation of nodes. 5. Block Production: The selected validators take turns producing blocks in a PoA-like manner, ensuring that blocks are generated quickly and efficiently. Validators validate transactions, add them to new blocks, and broadcast these blocks to the network. 6. Transaction Finality: BSC

achieves fast block times of around 3 seconds and quick transaction finality. This is achieved through the efficient PoSA mechanism that allows validators to rapidly reach consensus. Security and Economic Incentives 7. Staking: Validators are required to stake a substantial amount of BNB, which acts as collateral to ensure their honest behavior. This staked amount can be slashed if validators act maliciously. Staking incentivizes validators to act in the network's best interest to avoid losing their staked BNB. 8. Delegation and Rewards: Delegators earn rewards proportional to their stake in validators. This incentivizes them to choose reliable validators and participate in the network's security. Validators and delegators share transaction fees as rewards, which provides continuous economic incentives to maintain network security and performance. 9. Transaction Fees: BSC employs low transaction fees, paid in BNB, making it cost-effective for users. These fees are collected by validators as part of their rewards, further incentivizing them to validate transactions accurately and efficiently.

S.5 Incentive Mechanisms and Applicable Fees

The crypto asset that is the subject of this white paper is available on multiple DLT networks. These include: Ethereum and BNB Smart Chain. In general, when evaluating crypto assets, the total number of tokens issued across different networks must always be taken into account, as spillover effects can be adverse for investors.

The following applies to Ethereum:

The crypto-asset's PoS system secures transactions through validator incentives and economic penalties. Validators stake at least 32 ETH and earn rewards for proposing blocks, attesting to valid ones, and participating in sync committees. Rewards are paid in newly issued ETH and transaction fees. Under EIP-1559, transaction fees consist of a base fee, which is burned to reduce supply, and an optional priority fee (tip) paid to validators. Validators face slashing if they act maliciously and incur penalties for inactivity. This system aims to increase security by aligning incentives while making the crypto-asset's fee structure more predictable and deflationary during high network activity.

51

The following applies to BNB Smart Chain:

Binance Smart Chain (BSC) uses the Proof of Staked Authority (PoSA) consensus mechanism to ensure network security and incentivize participation from validators and delegators. Incentive Mechanisms 1. Validators: Staking Rewards: Validators must stake a significant amount of BNB to participate in the consensus process. They earn rewards in the form of transaction fees and block rewards. Selection Process: Validators are selected based on the amount of BNB staked and the votes received from delegators. The more BNB staked and votes received, the higher the chances of being selected to validate transactions and produce new blocks. 2. Delegators: Delegated Staking: Token holders can delegate their BNB to validators. This delegation increases the validator's total stake and improves their chances of being selected to produce blocks. Shared Rewards: Delegators earn a portion of the rewards that validators receive. This incentivizes token holders to participate in the network's security and decentralization by choosing reliable validators. 3. Candidates: Pool of Potential Validators: Candidates are nodes that have staked the required amount of BNB and are waiting to become active validators. They ensure that there is always a sufficient pool of nodes ready to take on validation tasks, maintaining network resilience. 4. Economic Security: Slashing: Validators can be penalized for malicious behavior or failure to perform their duties. Penalties include slashing a portion of their staked tokens, ensuring that validators act in the best interest of the network. Opportunity Cost: Staking requires validators and delegators to lock up their BNB tokens, providing an economic incentive to act honestly to avoid losing their staked assets. Fees on the Binance Smart Chain 5. Transaction Fees: Low Fees: BSC is known for its low transaction fees compared to other blockchain networks. These fees are paid in BNB and are essential for maintaining network operations and compensating validators. Dynamic Fee Structure: Transaction fees can vary based on network congestion and the complexity of the transactions. However, BSC ensures that fees remain significantly lower than those on the Ethereum mainnet. 6. Block Rewards: Incentivizing Validators: Validators earn block rewards in addition to transaction fees. These rewards are distributed to validators for their role in maintaining the network and processing transactions. 7. Cross-Chain Fees: Interoperability Costs: BSC supports cross-chain compatibility, allowing assets to be transferred between Binance Chain and Binance Smart Chain. These cross-chain operations incur minimal

fees, facilitating seamless asset transfers and improving user experience. 8. Smart

Contract Fees: Deployment and Execution Costs: Deploying and interacting with smart

contracts on BSC involves paying fees based on the computational resources required.

These fees are also paid in BNB and are designed to be cost-effective, encouraging

developers to build on the BSC platform.

S.6 Beginning of the period to which the disclosure relates

2024-08-16

S.7 End of the period to which the disclosure relates

2025-08-16

S.8 Energy consumption

228.82748 kWh/a

S.9 Energy consumption sources and methodologies

The energy consumption of this asset is aggregated across multiple components: To

determine the energy consumption of a token, the energy consumption of the networks

BNB Smart Chain and Ethereum is calculated first. For the energy consumption of the

token, a fraction of the energy consumption of the network is attributed to the token,

which is determined based on the activity of the crypto-asset within the network. When

calculating the energy consumption, the Functionally Fungible Group Digital Token

Identifier (FFG DTI) is used - if available - to determine all implementations of the asset in

scope. The mappings are updated regularly, based on data of the Digital Token Identifier

Foundation. The information regarding the hardware used and the number of

participants in the network is based on assumptions that are verified with best effort

using empirical data. In general, participants are assumed to be largely economically

rational. As a precautionary principle, we make assumptions on the conservative side

53

when in doubt, i.e. making higher estimates for the adverse impacts.

S.10 Renewable energy consumption

26.6113284308%

S.11 Energy intensity

0.00000 kWh

S.12 Scope 1 DLT GHG emissions - Controlled

0.00000 tCO2e/a

S.13 Scope 2 DLT GHG emissions - Purchased

0.07821 tCO2e/a

S.14 GHG intensity

0.00000 kgCO2e

S.15 Key energy sources and methodologies

To determine the proportion of renewable energy usage, the locations of the nodes are to be determined using public information sites, open-source crawlers and crawlers developed in-house. If no information is available on the geographic distribution of the nodes, reference networks are used which are comparable in terms of their incentivization structure and consensus mechanism. This geo-information is merged with public information from Our World in Data, see citation. The intensity is calculated as the marginal energy cost wrt. one more transaction. Ember (2025); Energy Institute -Statistical Review of World Energy (2024) - with major processing by Our World in Data. "Share of electricity generated by renewables - Ember and Energy Institute" [dataset]. Ember, "Yearly Electricity Data Europe"; Ember, "Yearly Electricity Data"; Energy Institute, "Statistical Review of World Energy" [original data]. Retrieved https://ourworldindata.org/grapher/share-electricity-renewables.

S.16 Key GHG sources and methodologies

To determine the GHG Emissions, the locations of the nodes are to be determined using public information sites, open-source crawlers and crawlers developed in-house. If no information is available on the geographic distribution of the nodes, reference networks are used which are comparable in terms of their incentivization structure and consensus mechanism. This geo-information is merged with public information from Our World in Data, see citation. The intensity is calculated as the marginal emission wrt. one more transaction. Ember (2025); Energy Institute - Statistical Review of World

Energy (2024) - with major processing by Our World in Data. "Carbon intensity of electricity generation - Ember and Energy Institute" [dataset]. Ember, "Yearly Electricity Data Europe"; Ember, "Yearly Electricity Data"; Energy Institute, "Statistical Review of World Energy" [original data]. Retrieved from https://ourworldindata.org/grapher/carbon-intensity-electricity Licenced under CC BY 4.0.