

White paper drafted under the European Markets in Crypto-Assets Regulation (EU) 2023/1114 for FFG 7JBMLCWCR



# **Preamble**

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#### 01. Date of notification

2025-08-14

# 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), due to the necessity of the "exclusivity".



# 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 crypto-asset "Sonic" (S) is the native token of the Sonic blockchain (at the time of writing this white paper (2025-08-10) and according to DTI FFG shown in F.14).

The Sonic mainnet officially launched on December 18, 2024, marking the evolution of the Fantom network into its next-generation Layer-1 blockchain.

At launch, FTM holders from the Fantom network could upgrade their tokens to S tokens via the Sonic Gateway.

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

Crypto Risk Metrics GmbH is seeking admission to trading on any Crypto Asset Service

Provider platform in the European Union 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. In accordance to Article

5(4), this crypto-asset white paper may be used by entities admitting the token to

trading after Crypto Risk Metrics GmbH as the person responsible for drawing up such

white paper has given its consent to its use in writing to the repective Crypto Asset

Service Provider. If a CASP wishes to use this white paper, inquiries can be made under

info@crypto-risk-metrics.com.

Part A - Information about the offeror or the person seeking

admission to trading

A.1 Name

Crypto Risk Metrics GmbH

A.2 Legal form

2HBR

A.3 Registered address

DE, Lange Reihe 73, 20099 Hamburg, Germany



#### A.4 Head office

Not applicable.

### A.5 Registration date

2018-12-03

#### A.6 Legal entity identifier

39120077M9TG0O1FE242

#### A.7 Another identifier required pursuant to applicable national law

Crypto Risk Metrics GmbH is registered with the commercial register in the the city of Hamburg, Germany, under number HRB 154488.

#### A.8 Contact telephone number

+4915144974120

#### A.9 E-mail address

info@crypto-risk-metrics.com

#### A.10 Response time (Days)

030

#### A.11 Parent company

Not applicable.

#### A.12 Members of the management body

Name	Position	Address	
Tim Zölitz	Chairman	Lange Reihe 73, 20099	
		Hamburg, Germany	

#### A.13 Business activity

Crypto Risk Metrics GmbH is a technical service provider, who supports regulated entities in the fulfillment of their regulatory requirements. In this regard, Crypto Risk

Metrics GmbH acts as a data-provider for ESG-data according to article 66 (5). Due to

the regulations laid out in article 5 (4) of the 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, Crypto Risk Metrics GmbH aims at providing

central services for crypto-asset white papers in order to minimize market confusion

due to conflicting white papers for the same asset.

A.14 Parent company business activity

Not applicable.

A.15 Newly established

Crypto Risk Metrics GmbH has been etablished since 2018 and is therefore not newly

established (i. e. older than three years).

A.16 Financial condition for the past three years

Crypto Risk Metrics GmbH's profit after tax for the last three financial years are as

follows:

2024 (unaudited): negative 50.891,81 EUR

2023 (unaudited): negative 27.665,32 EUR

2022: 104.283,00 EUR.

As 2023 and 2024 were the years building Software for the MiCAR-Regulation which was

not yet in place, revenue streams from these investments are expeted to be generated

in 2025.

A.17 Financial condition since registration

This point would only be applicable if the company were newly established and the

financial conditions for the past three years had not been provided in the bulletpoint

before.

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# 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

Yes

#### **B.2 Name**

The official website's privacy policy (https://soniclabs.notion.site/Sonic-Privacy-Policy-9582d39482584ec2a2c04078dad04518, accessed 2025-07-13) of the projects lists "Sonic Labs Ltd" (IBC 207973 B) of the Bahamas and "Sonic Foundation" (CR 409943) of the Cayman Islands as official entities.

### **B.3 Legal form**

A9N4 (Sonic Labs Ltd)

The exact legal for of the Sonic Foundation Ltd can not be verified at the time of writing, likely it is "MPUG".

#### **B.4. Registered address**

According to the official website's privacy policy (https://soniclabs.notion.site/Sonic-Privacy-Policy-9582d39482584ec2a2c04078dad04518, accessed 2025-07-13):

For Sonic Labs Ltd:

BS-NP, Windermere Corporate Management Ltd, 200 Sterling Commons East, Harbour Drive, Paradise Island, Bahamas

For Sonic Foundation Ltd:

KY-EE, Stuarts Corporate Services Ltd, P.O. Box 2510, Kensington House, 69 Dr Roy's Drive, George Town, KY1-1101, Cayman Islands

#### **B.5** Head office

Could not be found while drafting this white paper (2025-07-27).



# **B.6 Registration date**

Due to a lack of official founding documents at the time of writing (2025-08-12), the registration dates for the entities can not be independently verified. Crunchbase claims that Sonic Labs Ltd. was founded in 2018. (https://www.crunchbase.com/organization/sonic-labs-2d3f, accessed 2025-08-12).

# **B.7 Legal entity identifier**

Not applicable.

# B.8 Another identifier required pursuant to applicable national law

Sonic Labs Ltd: IBC 207973 B

Sonic Foundation: CR 409943

# **B.9 Parent company**

Could not be found while drafting this white paper (2025-07-27).

### **B.10** Members of the management body

Name	Function	Business address	
Michael Kong		BS-NP, Windermere Corporate Management Ltd, 200 Sterling Commons East, Harbour Drive, Paradise Island, Bahamas	
Andre Cronje	Co-Founder & CTO	BS-NP, Windermere Corporate Management Ltd, 200 Sterling Commons East, Harbour Drive, Paradise Island, Bahamas	
Joseph Epstein	Chief Marketing Officer	BS-NP, Windermere	



	Corpora	ite Mar	agement
	Ltd, 200	Sterling C	Commons
	East,	Harbour	Drive,
	Paradise	e Island, B	ahamas

#### **B.11** Business activity

Could not be found while drafting this white paper (2025-07-27).

#### **B.12 Parent company business activity**

Could not be found while drafting this white paper (2025-07-27).

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

Not applicable.

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.

# Part D - Information about the crypto-asset project

#### D.1 Crypto-asset project name

Long Name: Sonic, Short Name: S, according to the Digital Token Identifier Foundation (www.dtif.org, DTI see F.13, FFG DTI see F.14 as of 2025-08-06).



### **D.2 Crypto-assets name**

See F.13.

#### **D.3 Abbreviation**

See F.13.

### D.4 Crypto-asset project description

Sonic is a Layer-1 blockchain network originating from the Fantom network. The network's native token, S, is used for transaction fees, staking, validator participation, and governance. The platform includes a fee allocation model allowing application developers to receive a portion of the transaction fees generated by their applications.

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

Name	Function	Business address
Michael Kong	CEO	BS-NP, Windermere Corporate Management Ltd, 200 Sterling Commons East, Harbour Drive, Paradise Island, Bahamas
Andre Cronje	Co-Founder & CTO	BS-NP, Windermere Corporate Management Ltd, 200 Sterling Commons East, Harbour Drive, Paradise Island, Bahamas
Joseph Epstein	Chief Marketing Officer	BS-NP, Windermere Corporate Management Ltd, 200 Sterling Commons East, Harbour Drive,



		Paradise Island, Bahamas
Bernhard Scholz	Research	Not available
Sonic Labs Ltd	Legal person	BS-NP, Windermere Corporate Management Ltd, 200 Sterling Commons East, Harbour Drive, Paradise Island, Bahamas
Sonic Foundation	Legal person	KY-EE, Stuarts Corporate Services Ltd, P.O. Box 2510, Kensington House, 69 Dr Roy's Drive, George Town, KY1-1101, Cayman Islands

### **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 Sonic project's development activities are guided by periodic roadmap planning sessions as outlined in the project's official GitHub wiki (https://github.com/sonic-net/SONiC/wiki/Sonic-Roadmap-Planning, accessed on 2025-08-12).

This content and the implied roadmap are subject to change at any given time. They are not binding and no guarantees can be made about it. Past roadmap points are not necessarily implemented. Changes and developments can negatively impact the investors.

**D.9 Resource allocation** 

According to the official documentation (https://docs.soniclabs.com/sonic/s-token,

accessed on 2025-08-14). The S token has an initial total supply of 3.175 billion units at

network launch. New tokens will be minted on an ongoing basis thereafter.

The main allocation categories are: initial circulating supply, validator rewards, airdrop

allocation, ongoing funding, and block rewards.

Note that this information can not be independently verified and is subject to change.

The temporary token distribution can be traced on-chain:

https://sonicscan.org/accounts.

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) on any Crypto Asset

Service Providers platform that has obtained the written consent of Crypto Risk Metrics

GmbH as the person drafting this white paper.

E.2 Reasons for public offer or admission to trading

As already stated in A.13, Crypto Risk Metrics GmbH aims to provide central services to

draw up crypto-asset white papers in accordance to COMMISSION IMPLEMENTING

REGULATION (EU) 2024/2984. These services are offered in order to minimize market

confusion due to conflicting white papers for the same asset drawn up from different

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Crypto Asset Service Providers. As of now, such a scenario seems highly likely as a

Crypto Asset Service Provider who drew up a crypto-asset white paper and admitted the

respective token in the Union has no incentive to give his written consent to another

Crypto Asset Service Provider according to Article 5 (4 b) of the REGULATION (EU)

2023/1114 to use the white paper for his regulatory obligations, as this would 1.

strenghthen the market-positioning of the other Crypto Asset Service Provider (who is

most likely a competitor) and 2. also entail liability risks.

**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.

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.

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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 3.175 billion S tokens was initially minted

(https://docs.soniclabs.com/sonic/s-token, accessed 2025-08-12). The number of tokens

currently available is not constant and is subject to constant changes that may have a

negative impact on investors at any time.

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.

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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.

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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.

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

The trading on all MiCAR-compliant trading platforms is sought.

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E.34 Trading platforms Market identifier code (MIC)

Not applicable.

**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

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.

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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.

F.2 Crypto-asset functionality

The primary intended functionality of the S token is to serve as the native unit of

account on the Sonic network. It is intended to be used to pay transaction fees ("gas")

for operations executed on the network, to participate in staking for network validation,

and to secure the network through validator participation. The token is also foreseen to

support governance functions, enabling holders to participate in protocol-level decision-

making once such mechanisms are implemented.

No binding commitments regarding the above mentioned services have been formally

confirmed by the issuer.

F.3 Planned application of functionalities

See D.8.

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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.

F.6 Crypto-asset characteristics

The tokens are crypto-assets other than EMTs and ARTs, which are available on the

Sonic network. The tokens are fungible (up to 18 digits after the decimal point) and a

total of 3.175 billion have been initially minted, while ongoing mints occur. 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://www.soniclabs.com/

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

2025-09-11

F.10 Publication date

2025-09-11

F.11 Any other services provided by the issuer

No other services provided by the issuer or its founders could be identified at the time

of writing (2025-06-18).

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#### 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

JN8QMR9XS

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

7|BMLCWCR

#### 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**

Germany

#### **F.19 Host Member States**

Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, 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**

Information on the future offers to the public of crypto-assets were not available at the time of writing this white paper (2025-07-30).

#### **G.5** Issuer retained crypto-assets

According to the official documentation (https://docs.soniclabs.com/sonic/s-token, accessed on 2025-08-14). The S token has an initial total supply of 3.175 billion units at network launch. New tokens will be minted on an ongoing basis thereafter.

The main allocation categories are: initial circulating supply, validator rewards, airdrop allocation, ongoing funding, and block rewards.

Based on the official documentation, the proportion of S tokens that may be considered issuer-retained cannot be precisely determined, as no detailed breakdown of initial circulating supply by holder type is disclosed. As these allocations are subject to issuer control and future minting, they may present a concentration of supply risk.

Note that this information can not be independently verified and is subject to change. The temporary token distribution can be traced on-chain: https://sonicscan.org/accounts

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.

G.6 Utility token classification

No

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

As the crypto-asset grants no access to neither goods nor services this information is

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 the admission to trading of the tokens is sought.

**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** 

It cannot be excluded that protocols for the increase or decrease of the token supply

exist, as the available documentation does not fully describe all supply control

parameters. Furthermore, given the issuer's control over certain allocations and future

minting processes. Changes in supply can negatively impact investors.

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**G.13 Supply adjustment mechanisms** 

The S token supply can increase through scheduled minting for specific allocations and

decrease through token burns (based on official documentation:

https://docs.soniclabs.com/sonic/s-token, accessed 2025-08-12). Investors should note

that changes in the token supply can have a significant 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 S token is the native asset of the Sonic blockchain, a Layer-1 network utilizing

decentralized distributed-ledger technology. Sonic employs a leader-based Proof-of-

Stake consensus derived from the Lachesis protocol. As a native asset, S does not

implement a separate token standard.

H.3 Technology used

The S token functions as the native currency of the Sonic network and is integrated at

the protocol level. It is not issued through a separate smart contract but is part of the

core ledger implementation.

**H.4 Consensus mechanism** 

Sonic utilizes a Proof-of-Stake (PoS) consensus mechanism integrated with a Directed

Acyclic Graph (DAG) architecture to enhance scalability and efficiency.

H.5 Incentive mechanisms and applicable fees

Sonic's economic model is designed to incentivize active participation from both

validators and developers. Sonic's native token, S, is used for transaction fees, staking,

governance, and running validator nodes. The network features a unique Fee

Monetization (FeeM) model. Validators earn rewards through a combination of block

rewards and transaction fees. The block reward system employs a dynamic Annual

Percentage Rate (APR) mechanism

H.6 Use of distributed ledger technology

Yes, DLT operated by the issuer or a third-party acting on the issuer's behalf. The exact

influece of the issuer can't be independently verified.

H.7 DLT functionality description

Not applicable.

**H.8 Audit** 

As we are understanding the question relating to "technology" to be interpreted in a

broad sense, the answer answer to whether an audit of "the technology used" was

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conducted is "no, we can not guarantee, that all parts of the technology used have been

audited". This is due to the fact this report focusses on risk, and we can not guarantee

that each part of the technology used was audited.

**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 2025-07-30) 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 2025-07-30). 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.

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

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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.

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Bankruptcy Risk: Counterparties could go bankrupt, possibly resulting in a total loss for

the clients assets hold at that counterparty.

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.

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5. Industry

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

memecoin-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.

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

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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 cryptoasset 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

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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 and the popularity of the

memecoin narrative. Declining interest or negative sentiment could significantly impact

the token's value.

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

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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.

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.

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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 network 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 / Protocol

Vulnerabilities: The smart contract or protocol 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.

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5. Evolving Technology Risks: Technological Obsolescence: The fast pace of innovation in

blockchain technology may make the used token standard or technology in general

appear less competitive or become outdated, potentially impacting the usability or

adoption of the crypto-asset.

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

Crypto Risk Metrics GmbH

S.2 Relevant legal entity identifier

39120077M9TG0O1FE242

S.3 Name of the cryptoasset

Sonic

S.4 Consensus Mechanism

Sonic utilizes a Proof-of-Stake (PoS) consensus mechanism integrated with a Directed

Acyclic Graph (DAG) architecture to enhance scalability and efficiency.

**S.5 Incentive Mechanisms and Applicable Fees** 

Sonic's economic model is designed to incentivize active participation from both

validators and developers. Sonic's native token, S, is used for transaction fees, staking,

governance, and running validator nodes. The network features a unique Fee

Monetization (FeeM) model. Validators earn rewards through a combination of block

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rewards and transaction fees. The block reward system employs a dynamic Annual

Percentage Rate (APR) mechanism.

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

2024-08-14

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

2025-08-14

S.8 Energy consumption

84358.80000 kWh/a

S.9 Energy consumption sources and methodologies

For the calculation of energy consumptions, the so called 'bottom-up' approach is being used. The nodes are considered to be the central factor for the energy consumption of

the network. These assumptions are made on the basis of empirical findings through

the use of public information sites, open-source crawlers and crawlers developed in-

house. The main determinants for estimating the hardware used within the network are

the requirements for operating the client software. The energy consumption of the

hardware devices was measured in certified test laboratories. When calculating the

energy consumption, we used - if available - the Functionally Fungible Group Digital

Token Identifier (FFG DTI) to determine all implementations of the asset of question in

scope and we update the mappings regulary, 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

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

S.10 Renewable energy consumption

26.77343344005 %

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#### S.11 Energy intensity

0.00004 kWh

#### S.12 Scope 1 DLT GHG emissions – Controlled

0.00000 tCO2e/a

### S.13 Scope 2 DLT GHG emissions - Purchased

28.07544 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" Retrieved [original data1. from 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

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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.

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