

DefiTuna (TUNA)
White paper

In accordance with Title II of Regulation (EU) 2023/1114 (MiCA)

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01	Date of notification	2025-08-31

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 operator of the trading platform 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 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 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	False
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. The crypto-asset referred to in this white paper is not covered by 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 admission to trading 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 (36) or any other offer document pursuant to Union or national law.														
08	Characteristics of the crypto-asset	TUNA is a fungible crypto- asset that functions as the value-distribution mechanism of the DefiTuna protocol. 100% of protocol revenues, generated from both DefiTuna and Fusion AMM, are allocated on-chain to a dedicated revenue pool. Holders of \$TUNA who stake their tokens are entitled to claim a share of this revenue, in proportion to the amount they stake relative to the total pool. TUNA tokens are freely transferable, in whole or in part, to third parties, and all associated usage rights and obligations follow the token upon transfer. TUNA has a fixed maximum supply of 1,000,000,000 tokens, distributed as follows: <table><tr><th>Group Name</th><th>Allocation</th></tr><tr><td>Treasury</td><td>50%</td></tr><tr><td>Investors</td><td>15,8%</td></tr><tr><td>Core Contributors</td><td>10%</td></tr><tr><td>Liquidity Provision</td><td>10%</td></tr><tr><td>Initial Seed Liquidity</td><td>9,05%</td></tr><tr><td>Airdrops</td><td>5,15%</td></tr></table>	Group Name	Allocation	Treasury	50%	Investors	15,8%	Core Contributors	10%	Liquidity Provision	10%	Initial Seed Liquidity	9,05%	Airdrops	5,15%
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Treasury	50%															
Investors	15,8%															
Core Contributors	10%															
Liquidity Provision	10%															
Initial Seed Liquidity	9,05%															
Airdrops	5,15%															
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. TUNA does not grant access to goods or services.														

10	Key information about the offer to the public or admission to trading	Kraken seeks admission to trading of the TUNA token so as to be compliant with MiCA and in keeping with its mission to make available for trading to its clients a wide range of assets.
Part I – Information on risks		
I.1	Offer-Related Risks	General Risk Factors Associated with Crypto-Asset Offerings: The admission to trading of crypto-assets, including TUNA, is subject to general risks inherent to the broader cryptocurrency market. Market Volatility: The value of TUNA may experience substantial fluctuations driven by investor sentiment, macroeconomic developments, and market conditions. Regulatory Risks: Changes in legislation, applicable laws, compliance requirements or the implementation of new regulatory frameworks could affect the availability, trading, or use of such assets. Liquidity Risks: The ability to buy or sell the asset without significantly affecting its price can result in losses or the inability to exit a position when needed, especially during periods of market stress or low trading volume. Security Risks: The risk of exploitation, hacking or security vulnerabilities of the underlying protocol and or contracts of the token leading to a loss. Reputational Risks: The potential for damage to an organization's credibility or public trust, which can negatively impact stakeholder confidence and overall business viability.
I.2	Issuer-Related Risks	Financial Stability Risk: The financial condition of the issuer, including challenges in cash flow or profitability, may influence the project's ability to meet its objectives. If financial difficulties arise, they could impact the operations or sustainability of the issuer. Dependence on Key Personnel: The project's success is heavily dependent on the expertise and efforts of its core team. DefiTuna was co-founded by a small group of individuals. The loss of key team members or any breakdown in the team's functioning (for instance, due to internal governance issues or disputes) could slow down or jeopardize the project's progress and, by extension, diminish the utility and community trust in TUNA. Competition and Business Environment: DefiTuna operates in the AMM sector, which is competitive and rapidly evolving. Competing platforms or new technologies could reduce DefiTuna's market share or render its tools less unique. If DefiTuna fails to continue innovating or

		to respond to competitive pressures, user adoption of its platform (and demand for TUNA) may not grow as projected, posing a risk to the token's utility value. Legal and Regulatory Risks: DefiTuna must comply with applicable laws and regulations (including those beyond crypto-specific laws, such as data protection and financial regulations). Any legal challenges, regulatory investigations, or compliance failures involving the company could disrupt operations or tarnish its reputation. Internal Control and Governance Risks: The effectiveness of the issuer's internal controls and operational processes may impact the overall management of the project. Weaknesses in controls, governance and operations could impact the project's ability to meet its goals.
I.3	Crypto-Assets-related Risks	Market Volatility: The crypto-asset market is subject to significant price volatility, which may affect the value of TUNA. Prices can fluctuate rapidly and unpredictably due to various factors, including market sentiment, economic indicators, technological developments, regulatory news, and macroeconomic trends. This high level of volatility may lead to sudden gains or losses and can impact the liquidity and tradability of the crypto-asset. Liquidity: Liquidity refers to the ability to buy or sell a crypto-asset without causing significant price impact. TUNA may experience periods of low liquidity, meaning that it could be difficult to enter or exit positions at desired prices or volumes. Reduced liquidity may result from limited market participation, exchange restrictions, or broader market conditions. This can lead to increased price volatility, slippage, and difficulty in executing transactions. Cybersecurity & Technology Risks: Risks arising from vulnerabilities in the blockchain technology used by the project or platforms. Example risks include smart contract exploits, compromise of platforms, forking scenarios, compromise of cryptographic algorithms. Adoption Risks: The risk associated with the project not achieving its goals leading to lower than expected adoption and use within the ecosystem, the impact leading to a reduced utility and value proposition. Custody & Ownership Risk: The risk related to the inadequate safekeeping and control of crypto-assets e.g. loss of private keys, custodian insolvency leading to a loss. Concentration of Holdings: Related to liquidity, there is a risk that TUNA's ownership is concentrated among a small number of holders (such as investors or core contributors). According to the token distribution plan, those entities retain a sizable share of tokens (subject to lock-ups). While these tokens are locked initially, when they unlock, if one of these large holders decides to sell a substantial quantity, it could significantly depress the market price of TUNA.

I.4	Project Implementation-Related Risks	Reliance on Third-Party Technology DefiTuna relies on certain third-party technologies and integrations. If any critical external technology encounters problems – such as experiencing technical failure or security issues, or the underlying blockchains facing performance problems – it could prevent users from accessing features or moving their TUNA, damaging the project’s reputation. Regulatory Compliance As the project progresses, it may encounter regulatory challenges that impact its design, implementation, or operation. Evolving legal and compliance requirements could necessitate changes to the project’s architecture, user interface, or overall business model, potentially resulting in development delays, increased costs, or the need to rework key components.
I.5	Technology-Related Risks	Smart contract risks: DefiTuna uses smart contracts to facilitate automated transactions and processes. While these contracts enhance efficiency and decentralization, they also introduce specific technical risks. Vulnerabilities such as coding errors, design flaws, or security loopholes within the smart contract code may be exploited by malicious actors. Such exploits could result in the loss of assets, unauthorized access to sensitive information, or unintended and irreversible execution of transactions. Blockchain Network Risks: DefiTuna operates on a public blockchain infrastructure, which is maintained by a decentralized network of participants. The functionality and reliability of the crypto-asset are dependent on the performance and security of the underlying blockchain. Risks may include network congestion, high transaction fees, delayed processing times, or, in extreme cases, outages and disruptions. Additionally, vulnerabilities or failures in the consensus mechanism, attacks on the network (e.g., 51% attacks), or protocol-level bugs could impact the operation and availability of DefiTuna. Risk of Cryptographic Vulnerabilities: Technological advancements, such as quantum computing, could pose potential risks to cryptocurrencies. Privacy: Transactions involving DefiTuna are recorded on a public blockchain, where transaction data is transparent and permanently accessible. While public addresses do not directly reveal personal identities, transaction histories can be analyzed and, in some cases, linked to individuals through data aggregation or external information sources. This transparency may pose privacy concerns for users seeking confidentiality in their financial activity. Participants should be aware that transaction data on public blockchains is not inherently private and could be subject to scrutiny by third parties, including regulators, analytics firms, or malicious actors.
I.6	Mitigation measures	Security Audits The DefiTuna and Fusion AMM smart contracts have undergone security auditing by leading security firms such as SEC3, Torii Security, and Oshield.io.

		This audit process helps identify and address potential vulnerabilities, thereby reducing the risk of smart contract failures or exploits.
Part A - Information about the offeror or the person seeking admission to trading		
A.1	Name	CRYPTIC DOT INC.
A.2	Legal form	Incorporated company (Inc.)
A.3	Registered address	Ave. Saul J Esses Plaza Edison, PH Pacific Park Tower, Apt/Unit 35 B Oeste Panama City, Panama
A.4	Head office	Same as registered address
A.5	Registration Date	2023-12-18
A.6	Legal entity identifier	N/A
A.7	Another identifier required pursuant to applicable national law	N/A
A.8	Contact telephone number	N/A
A.9	E-mail address	support@defituna.com
A.10	Response Time (Days)	48 business hours
A.11	Parent Company	N/A

A.12	Members of the Management body			
		Full Name	Business Address	Function
		Moty Povolotski	Ave. Saul J Esses, Plaza Edison, PH Pacific Park Tower, Apt/Unit 35 B Oeste, Panama City, Panama	Chief Executive Officer (CEO)
A.13	Business Activity	N/A		
A.14	Parent Company Business Activity	N/A		
A.15	Newly Established	True		
A.16	Financial condition for the past three years	N/A		
A.17	Financial condition since registration	DefiTuna (CRYPTIC DOT INC.), incorporated on 18 December 2023, has been operational for less than three years. Accordingly, this section provides an overview of its financial condition since registration. Since launch, DefiTuna protocol has generated revenues from protocol operations. As of August 2025, cumulative protocol revenues amount to approximately USD 1.52 million since December 2024, with USD 290,000 generated in August 2025 alone. These revenues reflect the continued growth in protocol usage and adoption. In January 2025, DefiTuna successfully closed a seed round of USD 585,000 led by Orca, following an earlier pre-seed investment from SolBigBrain. Subsequently, on 22 July 2025, DefiTuna conducted a pre-sale of its native \$TUNA token, raising USD 2,500,000 through the sale of 50,000,000 tokens (representing 5% of the total token supply) at a price of USD 0.05 per token. The proceeds from the pre-sale and prior seed rounds have been primarily allocated to ensure adequate operational runway, supporting both stability and long-term protocol development. A portion of these resources has been used to expand the development team, including the recruitment of two additional developers following the Token Generation Event (TGE). Further allocations are dedicated to enhancing the Fusion AMM engine and the broader DefiTuna product suite.		

		Additionally, part of the funds raised has been applied to bootstrap liquidity pools, thereby facilitating robust market functioning and supporting the trading ecosystem around \$TUNA. The company maintains sufficient resources to cover near- and medium-term operational expenses, with a balanced focus on product development, liquidity provisioning, and community growth. Overall, DefiTuna's financial position since registration is sound, with diversified funding sources (revenues, seed financing, token pre-sale) and prudent allocation of capital towards development, liquidity, and operational sustainability.
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	False
B.2	Name	N/A
B.3	Legal form	N/A
B.4	Registered address	N/A
B.5	Head office	N/A
B.6	Registration Date	N/A
B.7	Legal entity identifier	N/A
B.8	Another identifier required pursuant to applicable national law	N/A
B.9	Parent Company	N/A

B.10	Members of the Management body	N/A
B.11	Business Activity	N/A
B.12	Parent Company Business Activity	N/A
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	N/A
C.2	Legal form	N/A
C.3	Registered address	N/A
C.4	Head office	N/A
C.5	Registration Date	N/A
C.6	Legal entity identifier of the operator of the trading platform	N/A
C.7	Another identifier required pursuant to applicable national law	N/A
C.8	Parent Company	N/A

C.9	Reason for Crypto-Asset White Paper Preparation	N/A
C.10	Members of the Management body	N/A
C.11	Operator Business Activity	N/A
C.12	Parent Company Business Activity	N/A
C.13	Other persons drawing up the crypto-asset white paper according to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114	N/A
C.14	Reason for drawing the white paper by persons referred to in Article 6(1), second subparagraph, of Regulation (EU) 2023/1114	N/A

Part D- Information about the crypto-asset project

D.1	Crypto-asset project name	DefiTuna
D.2	Crypto-assets name	TUNA

D.3	Abbreviation	TUNA
D.4	Crypto-asset project description	DefiTuna is a decentralized finance protocol built around Fusion AMM, an automated market-making engine that facilitates efficient trading of digital assets on Solana. The protocol provides a toolkit for liquidity providers to manage and optimize their positions, as well as a lending module that allows them to leverage positions to increase potential returns and overall market efficiency while maintaining risk controls. All operations, including liquidity provision, trade execution, and lending, are fully on-chain, auditable, and governed by smart contracts. Protocol revenue is converted into \$SOL and distributed daily to \$TUNA stakers. The protocol aims to deliver the most efficient and reliable AMM on Solana
D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project.	The project was founded by Moty Povolotski (CEO). Other team members, such as developers and advisors, are internal to the company and are not publicly disclosed for confidentiality and security reasons. To ensure transparency and operational integrity despite limited public disclosure: - Development, deployment, and protocol operations are governed by internal operational and governance frameworks. - Security and smart contract audits are conducted by independent, reputable firms: Torii Security, SEC3, and Oshield, with audit reports publicly available. - All critical processes, including code updates and staking/revenue operations, are subject to internal review, documentation, and formal approval procedures, ensuring accountability and mitigating operational risks. This structure provides robust controls compensating for non-disclosure, in line with regulatory expectations under MiCA.
D.6	Utility Token Classification	False
D.7	Key Features of Goods/Services for Utility Token Projects	N/A
D.8	Plans for the token	Key past milestones include the launch of Fusion AMM, our proprietary automated market-making engine powering DefiTuna pools, on 1st July 2025, followed by the launch of our \$TUNA token on 30th July 2025.

		For information on upcoming milestones and roadmap, please refer to the project team's official website.
D.9	Resource Allocation	In January 2025, DefiTuna raised \$585,000 in a seed round led by Orca, following a pre-seed investment from SolBigBrain. Subsequently, a pre-sale of \$TUNA tokens was conducted on 22nd July 2025, raising \$2,500,000 through the sale of 50,000,000 tokens (5% of total supply) at a price of \$0.05 per token.
D.10	Planned Use of Collected Funds or Crypto-Assets	The funds raised from the \$TUNA token pre-sale and prior seed rounds will be primarily allocated to ensure sufficient runway for the protocol, supporting operational stability and long-term development. A portion of the funds has already been used to expand the development team, including the hiring of two additional developers following the Token Generation Event (TGE). Remaining resources will be dedicated to further platform development, including enhancements to the Fusion AMM engine and the broader DefiTuna toolkit. Additionally, a portion of the funds have already been used to bootstrap DefiTuna pools, providing initial liquidity support to ensure robust market functioning and optimize user experience.
Part E - Information about the offer to the public of crypto-assets or their admission to trading		
E.1	Public Offering or Admission to trading	ATTR
E.2	Reasons for Public Offer or Admission to trading	Making secondary trading available to the consumers on the Kraken Trading platform in compliance with the MiCA regulatory framework.
E.3	Fundraising Target	N/A
E.4	Minimum Subscription Goals	N/A
E.5	Maximum Subscription Goal	N/A
E.6	Oversubscription Acceptance	N/A

E.7	Oversubscription Allocation	N/A
E.8	Issue Price	N/A
E.9	Official currency or other crypto-assets determining the issue price	N/A
E.10	Subscription fee	N/A
E.11	Offer Price Determination Method	N/A
E.12	Total Number of Offered/Traded crypto-assets	1 000 000 000 maximum supply
E.13	Targeted Holders	ALL
E.14	Holder restrictions	N/A
E.15	Reimbursement Notice	N/A
E.16	Refund Mechanism	N/A
E.17	Refund Timeline	N/A

E.18	Offer Phases	N/A
E.19	Early Purchase Discount	N/A
E.20	Time-limited offer	N/A
E.21	Subscription period beginning	N/A
E.22	Subscription period end	N/A
E.23	Safeguarding Arrangements for Offered Funds/crypto-assets	N/A
E.24	Payment Methods for crypto-asset Purchase	N/A
E.25	Value Transfer Methods for Reimbursement	N/A
E.26	Right of Withdrawal	N/A
E.27	Transfer of Purchased crypto-assets	N/A

E.28	Transfer Time Schedule	N/A
E.29	Purchaser's Technical Requirements	N/A
E.30	Crypto-asset service provider (CASP) name	N/A
E.31	CASP identifier	9845003D98SCC2851458
E.32	Placement form	NTAV
E.33	Trading Platforms name	Payward Global Solutions LTD dba Kraken
E.34	Trading Platforms Market Identifier Code (MIC)	PGSL
E.35	Trading Platforms Access	N/A
E.36	Involved costs	N/A
E.37	Offer Expenses	N/A
E.38	Conflicts of Interest	The issuer, CRYPTIC DOT INC. (DefiTuna), may have potential conflicts of interest as it is both the creator of the protocol and a holder of treasury tokens allocated to cover protocol expenses, including infrastructure, salaries, and partnerships. These holdings create an alignment of interest with the success of the token. To mitigate potential conflicts and ensure transparency:

		- Treasury tokens are subject to pre-defined allocations, and all movements are publicly verifiable on-chain. Here is the protocol treasury wallet. - Market-making and liquidity provision: Each exchange where \$TUNA is listed is responsible for maintaining liquidity on its market. DefiTuna may participate in liquidity provision on its own platform using the dedicated Liquidity Provision wallet, with the initial allocation defined in the tokenomics. This arrangement is structured to avoid conflicts of interest. - Related-party transactions: There are no related-party entities owned by the founder or team members, nor any preferential agreements with strategic partners. - Exchange-issuer commercial ties: No preferential treatment or non-standard commercial arrangements exist with exchanges; all terms are in line with standard market practices. No other material conflicts of interest have been identified. These measures ensure transparency, accountability, and alignment with regulatory expectations under MiCA.
E.39	Applicable law	Any dispute relating to this white paper shall be governed by and construed and enforced in accordance with the laws of Ireland without regard to conflict of law rules or principles (whether of Ireland or any other jurisdiction) that would cause the application of the laws of any other jurisdiction, irrespective of whether TUNA tokens qualify as right or property under the applicable law.
E.40	Competent court	Any disputes or claims arising out of this white paper will be subject to the exclusive jurisdiction of the Irish courts.
Part F – Information about the crypto-assets		
F.1	Crypto-Asset Type	TUNA is a fungible utility token (SPL standard) issued on the Solana blockchain. Under Regulation (EU) 2023/1114 (MiCA), it is classified as a crypto-asset other than an asset-referenced token or an e-money token. TUNA does not confer ownership, governance, or profit-participation rights, and does not qualify as a financial instrument under MiFID II.
F.2	Crypto-Asset Functionality	TUNA is a fungible SPL token issued on the Solana blockchain that functions as the core value-distribution instrument of the DefiTuna protocol. All protocol fees generated by DefiTuna and the Fusion AMM are automatically routed on-chain to a dedicated revenue pool. Holders who stake their TUNA in the DefiTuna staking contract may claim a proportional share of the amounts available in that pool, in accordance with the size of their stake relative to the total staked supply. Distributions are executed solely by the smart contract and are variable in nature, depending on protocol usage; they can be reduced to zero in periods of inactivity. Unstaked TUNA remains freely transferable between Solana-compatible addresses, subject only to network fees. The token does not confer governance powers, ownership interests, redemption rights, or repayment obligations. The contract does not include mint or burn functions that would allow the issuer to alter supply. In line with the Joint Committee's criteria set out in JC 2024/28, this mechanism does not establish a right to profits or claims comparable to those attached to

		financial instruments or collective investment units. The issuer makes no contractual promise to pay, top-up, or guarantee returns; the only entitlement of holders is to claim what the on-chain contract has already allocated. There is no discretionary management of pooled assets, no equity or debt-like entitlement, and no enforceable claim against the issuer's balance sheet. The distributions are purely algorithmic outcomes of smart-contract execution and depend exclusively on user activity within the protocol. Accordingly, the assessment is negative for classification as a MiFID II transferable security or as a unit of a collective investment undertaking. Under MiCA, TUNA is therefore classified as a crypto-asset other than an asset-referenced token or an e-money token. Nevertheless, revenue-sharing features are recognised as a potential red flag and therefore disclosed transparently. Competent authorities and trading venues may apply heightened scrutiny, but based on the current design and disclosures, the token does not fall within the scope of financial instruments.
F.3	Planned Application of Functionalities	All major functionalities are active ; no additional functionalities have been publicly announced.
A description of the characteristics of the crypto-asset, including the data necessary for classification of the crypto-asset white paper in the register referred to in Article 109 of Regulation (EU) 2023/1114, as specified in accordance with paragraph 8 of that Article		
F.4	Type of crypto-asset white paper	OTHR
F.5	The type of submission	NEWT
F.6	Crypto-Asset Characteristics	\$TUNA is a fungible crypto-asset issued on the Solana blockchain with a fixed total supply of 1,000,000,000 tokens. The \$TUNA token contract does not include mint or burn functions. The mint authority has been permanently revoked, ensuring that the total supply is fixed and cannot be increased. There is no freeze authority, meaning that token holdings cannot be frozen or restricted by any entity. The upgrade authority for the token program, as well as for the associated revenue and staking contracts, has been permanently disabled, ensuring immutability of the protocol's operational logic. All key aspects of the token are publicly verifiable on-chain, including: - Token mint info: https://solscan.io/token/TUNAFXDZEdQizTMTh3uEvNvYqJmqFHZbEJt8joP4cyx

		- Upgrade authority wallet: https://solscan.io/account/tmnbW9cJJQCx9aDQxqmEDitdsFjsDtHxi2u6AJhAr18 - Staking/revenue contract: https://solscan.io/account/G9XfJoY81n8A9bZKaJFhJYomRrcvFkuJ22em2g8rZuCh \$TUNA tokens that are not staked may be freely transferred between holders, subject only to applicable Solana network transaction fees. This structure ensures transparency, immutability, and verifiable control over the token supply and protocol logic, in line with regulatory expectations.
F.7	Commercial name or trading name	CRYPTIC DOT INC.
F.8	Website of the issuer	https://defituna.com
F.9	Starting date of offer to the public or admission to trading	2025-07-30
F.10	Publication date	2025-08-31
F.11	Any other services provided by the issuer	N/A
F.12	Language or languages of the white paper	English
F.13	Digital Token Identifier	N/A

F.14	Functionally Fungible Group Digital Token Identifier	N/A
F.15	Voluntary data flag	Mandatory
F.16	Personal data flag	True
F.17	LEI eligibility	N/A
F.18	Home Member State	Ireland
F.19	Host Member States	Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, Norway, Iceland, Lichtenstein.
Part G - Information on the rights and obligations attached to the crypto-assets		
G.1	Purchaser Rights and Obligations	Right of Transfer Holders may transfer TUNA to any Solana-compatible address. Transfers are subject to network transaction fees. There are no contractual restrictions on transferability imposed by the issuer. Trading TUNA may be admitted to trading on secondary markets, including centralized and decentralized trading platforms that support the token. The issuer does not guarantee the availability of trading venues or liquidity. Staking Rights Holders may stake TUNA within the DefiTuna protocol to receive a share of the protocol's fee revenues. The amount receivable is proportional to the number of tokens staked relative to the total staked supply. Rewards are distributed on-chain. Other Rights TUNA does not grant any governance rights, ownership rights, voting rights, profit participation rights beyond staking rewards, or claims against the issuer. The token does not represent equity, debt, or any other financial instrument.
G.2	Exercise of Rights and obligations	Transfers are executed via Solana transactions; staking/unstaking is performed via the DefiTuna staking contract, both of which are subject to Solana network fees.

G.3	Conditions for modifications of rights and obligations	The rights and obligations attached to \$TUNA reflect the information available at the time of issuance. Any potential modifications to these rights or obligations would be governed by the protocol's internal governance framework and the associated smart contract mechanisms. Changes may occur through one or more of the following mechanisms: - Smart contract updates: Any modifications to token functionality or protocol logic would be implemented via new contract versions, with prior internal review and security audits. - Governance procedures: Proposed changes are subject to formal approval within the project's governance framework, ensuring that decision-making is documented and traceable. - Communication to holders: All material updates are communicated publicly, including via official website announcements, social media channels, and on-chain notices where applicable. Holders are protected through the following measures: - Immutable core contracts: Critical aspects of the token, including total supply, mint/burn authority, and upgrade authority, are permanently fixed or revoked on chain, limiting the scope of potential changes. - Transparency and auditability: Any changes to protocol logic or operational procedures are audited by independent security firms and are publicly verifiable on-chain. - Advance notice: Material changes affecting rights or obligations are communicated in advance to allow holders to make informed decisions. This structure ensures that modifications to rights and obligations are governed, transparent, and auditable, maintaining alignment with regulatory expectations and investor protection principles under MiCA.
G.4	Future Public Offers	N/A
G.5	Issuer Retained Crypto-Assets	500,000,000 TUNA tokens (50% of the total supply) have been allocated to the treasury to participate in the revenue-sharing model and cover protocol expenses.
G.6	Utility Token Classification	False
G.7	Key Features of Goods/Services of Utility Tokens	N/A

G.8	Utility Tokens Redemption	N/A
G.9	Non-Trading request	This white paper reflects a request to admit the token to trading.
G.10	Crypto-Assets purchase or sale modalities	N/A
G.11	Crypto-Assets Transfer Restrictions	There are no restrictions on the free transferability of TUNA tokens once issued and admitted to trading. TUNA is a standard SPL token on the Solana blockchain and can be freely transferred between compatible wallets and trading venues. The only exceptions concern treasury, investors and core contributors allocations that may be subject to vesting schedules designed to ensure long-term commitment to the project. These restrictions apply exclusively to such reserved allocations and do not affect the transferability of tokens acquired by the public. No other contractual, statutory, or technical restrictions on transferability apply.
G.12	Supply Adjustment Protocols	False
G.13	Supply Adjustment Mechanisms	N/A
G.14	Token Value Protection Schemes	False
G.15	Token Value Protection Schemes Description	N/A
G.16	Compensation Schemes	False

G.17	Compensation Schemes Description	N/A
G.18	Applicable law	Any dispute relating to this white paper shall be governed by and construed and enforced in accordance with the laws of Ireland without regard to conflict of law rules or principles (whether of Ireland or any other jurisdiction) that would cause the application of the laws of any other jurisdiction, irrespective of whether TUNA tokens qualify as right or property under the applicable law.
G.19	Competent court	Any disputes or claims arising out of this white paper will be subject to the exclusive jurisdiction of the Irish courts.
Part H – Information on the underlying technology		
H.1	Distributed ledger technology	TUNA is issued on the Solana blockchain, a public and decentralized distributed ledger. Solana combines Proof-of-Stake (PoS) and Proof-of-History (PoH) to achieve consensus, ensuring that all TUNA transactions are securely recorded, timestamped, and verifiable on an immutable ledger.
H.2	Protocols and technical standards	TUNA conforms to the SPL token standard on the Solana blockchain, ensuring interoperability with compatible wallets, exchanges, and decentralized applications (DApps).
H.3	Technology Used	The TUNA token is implemented as an SPL token on Solana. Token management, including transfers, staking, and associated logic, is executed on-chain via smart contracts and governed by Solana's consensus mechanisms.
H.4	Consensus Mechanism	Solana employs a hybrid consensus model combining Proof-of-Stake (PoS) and Proof-of-History (PoH). PoH functions as a cryptographic timestamping mechanism, establishing a verifiable order of events. PoS is implemented through Tower Byzantine Fault Tolerance (Tower BFT), a variant of Practical Byzantine Fault Tolerance (PBFT), which leverages PoH to achieve consensus efficiently, enhancing network scalability and reducing transaction latency.
H.5	Incentive Mechanisms and Applicable Fees	TUNA relies on Solana's native incentive mechanisms, whereby validators are rewarded in SOL for transaction validation and block production. Network participants pay minimal, predictable transaction fees in SOL for transfers, staking, and other on-chain operations. These fees are distributed to validators to maintain network security.
H.6	Use of Distributed Ledger Technology	False
H.7	DLT Functionality Description	N/A

H.8	Audit	True
H.9	Audit outcome	DefiTuna and Fusion AMM smart contracts have undergone comprehensive audits by leading security firms, including SEC3, Torii Security, and Oshield.io, all well-established in the Solana ecosystem. No critical issues remain unresolved. DefiTuna smart contract audits: - 2025-01-27, Torii Security - 2025-03-17, SEC3 Fusion AMM smart contract audits: - 2025-07-23, SEC3 - 2025-07-25, Oshield All audit reports are publicly available and provide detailed assessments of the security, functionality, and compliance of the contracts. These audits ensure that the contracts operate reliably and securely, in line with industry best practices and regulatory expectations.
J – Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts		
S.1	Name	CRYPTIC DOT INC.
S.2	Relevant legal entity identifier	N/A
S.3	Name of the crypto-asset	TUNA
S.4	Consensus Mechanism	Consensus Mechanism: Solana uses a hybrid of Proof of History (PoH) and Proof of Stake (PoS) to achieve high throughput, low latency, and strong security. - Proof of History (PoH): timestamps transactions using a verifiable delay function (VDF), providing a cryptographic sequence that establishes the order of events. - Proof of Stake (PoS): validators are selected to produce blocks based on staked SOL tokens; token holders can delegate their stake to validators and earn proportional rewards.

		Consensus Process: Validators collect and verify transactions, generate PoH sequences, and produce blocks in the order dictated by PoH. Other validators confirm blocks, ensuring correctness and finalization. Economic Incentives and Security: Validators earn SOL rewards and transaction fees for producing and validating blocks. Staking acts as collateral to incentivize honest behavior, and misbehaving validators may be penalized through slashing.
S.5	Incentive Mechanisms and Applicable Fees	Solana secures its network via staking rewards and transaction fees: validators earn SOL rewards for producing and validating blocks, while delegators receive proportional rewards by staking their SOL with validators. Malicious behavior or failure to validate blocks may result in slashing penalties. Transaction fees are paid in SOL and remain low due to high network throughput. Additional fees include rent for on-chain storage and computational costs for executing smart contracts.
S.6	Beginning of the period to which the disclosed information relates	2024-05-28
S.7	End of the period to which the disclosed information relates	2025-05-28
Mandatory key indicator on energy consumption		
S.8	Energy consumption	295.65000 kWh/a
Sources and methodologies		
S.9	Energy consumption sources and methodologies	The energy consumption reported above is estimated by attributing a fraction of the total Solana network energy consumption to the activity of the TUNA token. The attribution is based on the relative share of TUNA transactions observed over a 24-hour snapshot; extrapolated to a full calendar year. For the Solana network, the estimated energy consumption per transaction is assumed to be approximately 0.00012 kWh, in line with publicly available sustainability reports from the Solana Foundation. To account for periods of higher activity and methodological uncertainty, a conservative safety margin of 50% has been applied. The information regarding network hardware and participant behaviour is based on assumptions consistent with industry practices and verified on a best-effort

		basis using available empirical data. Where uncertainty remains, conservative assumptions have been adopted in line with the precautionary principle.
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