Tra labs Inc. MiCAR White Paper

TRUSTA.AI

IN ACCORDANCE WITH

TITLE II OF REGULATION (EU) 2023/1114

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01. Date of Notification: 2025-10-27

Regulatory Disclosures

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 and, to the best of the knowledge of the management body of Tra labs Inc., 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):

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):

The utility token referred to in this white paper may not be exchangeable against the good or service promised in the crypto-asset white paper, especially in the case of a failure or discontinuation of the crypto-asset project.

06. Statement in accordance with Article 6(5), points (e) and (f):

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:

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 (36) or any other offer document pursuant to Union or national law.

08. Characteristics of the Crypto-Asset Holders of TA tokens have functional rights within the TRUSTA AI network, allowing them to pay for protocol services and participate in governance signaling. The token does not confer any ownership rights, profit entitlements, or contractual claims against the issuer. Purchasers are responsible for their own custody and must exercise their rights by interacting with the protocol's smart contracts using a compatible wallet. As the protocol is decentralized, any modifications to the token's utility or features are subject to community governance proposals and public disclosure, not unilateral changes by the issuer.

09. Utility Token Summary The $TA token is the native utility token for the Trusta AI identity and reputation network, granting access to its core services. Key functionalities include: (i) Payment for Services: Users and projects use $TA to pay for identity and attestation services such as Proof of Humanity, Sybil detection, and reputation scoring. (ii) Staking for Participation: Network participants, including issuers, verifiers, and AI infrastructure providers, are required to stake $TA to provide services within the ecosystem. (iii) Ecosystem Incentives: The token is used to reward contributors for active participation, which helps secure and decentralize the network. (iv) Governance: Holders can participate in protocol-level governance through signaling and parameter proposals. The total supply is 1 billion $TA tokens. The token is designed to be freely transferable on supported blockchain networks.

10. Key Information About the Admission to Trading No public offer of TRUSTA AI (TA) tokens is being made in connection with this disclosure. The token is already issued, and this document does not represent a new token sale, subscription period, or associated fundraising activity. Accordingly, there are no fundraising targets, issue prices, or subscription fees applicable. No crypto-asset service provider has been appointed to place the token. The TRUSTA AI (TA) token is being admitted to trading on the Kraken trading platform to support market access and liquidity.

A. Information about the Person Seeking Admission to Trading

A.1 Name: Tra labs Inc.

A.2 Legal Form: N/A

A.3 Registered address: N/A

A.4 Head office: N/A

A.5 Registration Date: 2024-01-08

A.6 Legal entity identifier: 875500M35DIQIG1P8B92

A.7 Another identifier required pursuant to applicable national law: N/A

A.8 Contact telephone number: +852 6434 3896

A.9 E-mail address: peet@trustalabs.com

A.10 Response Time (Days): 018

A.11 Parent Company: N/A

A.12 Members of the Management body:

Name	Business Function	Business Address
Chen Jidong	CEO	Workstation F02, Entrepreneurship Centre, Level 5, Cyberport Road, Hong Kong
Chen Tao	CTO	Workstation F02, Entrepreneurship Centre, Level 5, Cyberport Road, Hong Kong

A.13 Business Activity:

Tra labs Inc. is a Panama–registered technology company operating a decentralized identity and reputation network for the AI + Crypto ecosystem. The platform provides privacy-preserving attestations and reputation scoring through AI-driven on-chain analysis, enabling trusted identity verification for both human users and AI agents. The company builds and maintains infrastructure that powers Proof of Humanity (PoH), Sybil resistance, and reputation scoring protocols, creating a verifiable identity layer that reduces fraud, enhances trust, and unlocks new applications in DeFi, gaming, and AI agent economies.

Trusta AI operates the following core services:

TrustaScan: A Sybil-detection and Proof of Humanity protocol leveraging AI and graph-based clustering algorithms to identify bots and fake accounts across multiple blockchains.

TrustaGo (MEDIA Score): A Web3 reputation and credit assessment system that aggregates user behavior into multidimensional scores, providing fair and quantifiable measures of trustworthiness.

Trusta Agent: An attestation and verification service for both humans and AI agents, supporting Proof of Humanity, Test of Humanity, and Proof of AI Agent use cases.

Trusta Attestation Service (TAS): A verifiable identity infrastructure leveraging zero-knowledge proofs and on-chain attestations, enabling ecosystem projects to integrate decentralized identity seamlessly.

The company does not currently act as a crypto-asset custodian, exchange operator, or financial intermediary. It is not licensed as a Crypto-Asset Service Provider (CASP) under MiCA at the time of this filing, but provides technical infrastructure and token utility services related to the $TA token.

Revenue is primarily generated through attestation service fees charged to end users (retail identity verification and attestations) and B2B data-driven consulting services (Sybil analysis and reputation scoring for airdrops, campaigns, and blockchain ecosystems).

A.14 Parent Company Business Activity: N/A

A.15 Newly Established: false

A.17 Financial condition since registration:

Since its incorporation and registration in January 2024, Tra Labs Inc. has been maintaining its financial statements in accordance with applicable accounting standards.

Summary of Financial Position

Below is a summary of the financial position of Tra Labs Inc.:

2025 Q2 Financial Statements:

Total assets: USD 2,160,070 (excluding reserves of $TA tokens)

Liabilities: USD 0

Total liabilities and equity: USD 2,160,070

Financial Performance

Tra Labs Inc. has demonstrated consistent financial stability and operational growth since its incorporation. The company has completed two funding rounds:

Seed Round (December 2022): Raised approximately USD 3 million from institutional investors including SevenX Ventures, Vision Plus Capital, Redpoint Ventures, HashKey Capital, and SNZ Holding.

Strategic Round (October 2024): Raised an additional USD 2 million, supported by Solana, Consensys, Starknet, GSR, Go Plus, and UXlink.

As of Q2 2025, the company maintains a treasury of approximately USD 2 million equivalent, in addition to its $TA token reserves.

Tra Labs Inc. generates recurring revenue primarily through attestation service fees and B2B Sybil detection and reputation consulting. The company's annual recurring revenue (ARR) exceeds USD 1 million, driven by Proof of Humanity and reputation attestations claimed by over 1.5 million users, as well as enterprise clients utilizing the TrustaScan and TrustaGo services.

The platform currently supports more than 2.5 million on-chain attestations issued across multiple blockchain ecosystems, including Linea, Starknet, BNB, Scroll, TON, and Solana.

Tra Labs Inc. is in its growth phase, focusing on strengthening its ecosystem presence and scaling infrastructure for decentralized identity and reputation systems. Looking ahead, the company anticipates continued financial growth supported by the increasing adoption of Web3 identity standards and cross-chain reputation frameworks.

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

B.1 Issuer Information: false, the offeror and entity are the same, so this section is not applicable

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

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, This section is not applicable, as neither the operator of a trading platform nor any other person, apart from the issuer, has drawn up or contributed to the preparation of the crypto-asset white paper.

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

D. Information about the Crypto-Asset Project

D.1 Crypto-asset project name: TRUSTA AI

D.2 Crypto-assets name: TRUSTA AI Token

D.3 Abbreviation: TA

D.4 Crypto-asset project description:

Trusta AI is a decentralized identity and reputation infrastructure network that applies AI and cryptographic attestations to establish trust within the Web3 and AI ecosystems. The platform enables privacy-preserving Proof of Humanity (PoH), Sybil resistance, and reputation scoring through behavior fingerprint analysis, supporting verifiable and transparent identity services without reliance on centralized intermediaries.

The Trusta network provides modular products including TrustaScan (Sybil detection and PoH protocol), TrustaGo (MEDIA Score) (on-chain reputation and credit scoring), and Trusta Agent (attestations for both humans and AI agents). These services allow users, projects, and developers to verify identity, reputation, and trustworthiness in a decentralized manner. All protocols are deployed on public blockchains (e.g., Ethereum, Linea, BNB, Scroll, TON, Solana) and do not involve custody of user assets or centralized exchange functions.

The $TA token is the native utility token of the Trusta.AI network. It is used to pay for identity and attestation services, to incentivize issuers, verifiers, and AI infrastructure providers, and to stake for participation within the network. $TA does not confer equity ownership, revenue-sharing rights, or legal entitlements of any kind. Governance rights, where applicable, are limited to protocol-level signaling and parameter voting, without legal or financial control over the issuer or network.

The project does not issue asset-referenced tokens (ARTs), electronic money tokens (EMTs), or financial instruments as defined under Regulation (EU) 2023/1114.

D.5 Details of all natural or legal persons involved in the implementation of the crypto-asset project:

Name	Business Function	Business Address
Tra labs inc.	Technology development and project execution	Workstation F02, Entrepreneurship Centre, Level 5, Cyberport Road, Hong Kong
Tra Foundation	Token holding entity (not directly operating)	Ricardo Arias Street, Advanced Building, First Floor, Panama

Name	Business Function	Business Address City, Republic of Panama

D.6 Utility Token Classification: true

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

$TA is the native utility token of the Trusta AI identity and reputation network. It is used exclusively within the protocol for the following purposes:

Payment for Identity and Attestation Services: End users and projects pay in $TA when requesting Proof of Humanity, Sybil detection, or reputation attestations (e.g., MEDIA score).

Staking for Network Participation: Issuers, verifiers, and AI infrastructure providers are required to stake $TA to qualify for providing services within the Trusta identity network.

Ecosystem Incentives and Rewards: Contributors (e.g., attesters, validators, and AI agents) are incentivized with $TA for active participation, ensuring reliability and decentralization of the network.

Governance Rights: Holders of $TA may participate in protocol-level governance through signaling and parameter proposals. These rights are limited to technical and ecosystem decisions and do not confer ownership, revenue claims, or legal entitlements of any kind.

TA does not represent any ownership interest, equity stake, debt claim, or entitlement to any form of revenue or profit from the issuer. Governance rights, where applicable, are non-binding, procedural, and executed via smart contract mechanisms. They do not confer any shareholder, legal, or financial rights over Tra labs Inc. or its assets.

D.8 Plans for the token:

No further emission events, major tokenomic changes, or new functionality expansions beyond those disclosed in Sections D.4 and D.7 are currently planned. Any future updates to token functionality or governance scope will be proposed and reviewed through community processes and disclosed via formal public channels.

D.9 Resource Allocation:

TRUSTA AI maintains $3M in treasury reserves and operates with a 15-member full-time team comprising technical development (8 members), executive management (3 members), marketing and operations (2 members), and administrative functions (2 members).

D.10 Planned Use of Collected Funds or Crypto-Assets:

Not applicable. This white paper does not accompany a public offering of tokens and no funds or crypto-assets are being collected in connection with this publication.

E. Information about the Admission to Trading

E.1 Public Offering or Admission to trading: ATTR

E.2 Reasons for Public Offer or Admission to trading: The admission to trading is intended to expand the Trusta ecosystem by enabling broader access to the token, increasing utility adoption, and facilitating seamless transactions for platform users.

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 any 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: 1000000000

E.13 Targeted Holders: ALL

E.14 Holder restrictions: Yes. Participation is restricted in jurisdictions where the offering, sale, or trading of tokens is not permitted under applicable laws or regulations. Residents and entities from such jurisdictions are not eligible to participate.

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: Purchases may be settled using supported cryptocurrencies (such as USDT, USDC, or ETH) and, where permitted, in fiat currency through authorized payment service providers.

E.25 Value Transfer Methods for Reimbursement: Any reimbursement, where applicable, will be processed in the same currency (crypto or fiat) as the original transaction and transferred to the purchaser's verified wallet address or designated payment account.

E.26 Right of Withdrawal: N/A

E.27 Transfer of Purchased Crypto-Assets: Upon confirmation of payment, the purchased tokens will be transferred directly to the purchaser's verified wallet address on the supported blockchain network.

E.28 Transfer Time Schedule: N/A

E.29 Purchaser's Technical Requirements: Purchasers must have a compatible blockchain wallet that supports the token's network.

E.30 Crypto-asset service provider (CASP) name: N/A

E.31 CASP identifier: N/A

E.32 Placement form: N/A

E.33 Trading Platforms name: Kraken

E.34 Trading Platforms Market Identifier Code (MIC): PGSL

E.35 Trading Platforms Access: Investors may access the platforms through their official websites or mobile applications upon successful completion of the required registration and KYC verification procedures.

E.36 Involved costs: Standard trading fees established by the respective trading platforms will apply. Tra Labs Inc. does not impose any additional fees for platform access.

E.37 Offer Expenses: N/A

E.38 Conflicts of Interest: There are no known conflicts of interest between the issuer, the offeror, and any affiliated or third-party trading platforms.

E.39 Applicable law: This offering is governed by the laws of the British Virgin Islands (BVI), together with applicable international AML/KYC and securities regulations in relevant jurisdictions.

E.40 Competent court: Any disputes arising in connection with this offering shall fall under the jurisdiction of the courts of the British Virgin Islands (BVI), unless otherwise required by applicable law.

F. Information about the Crypto-Assets

F.1 Crypto-Asset Type:

TA is classified as a utility token under the Markets in Crypto-Assets Regulation (MiCAR). It is an ERC-20 compatible crypto-asset deployed on Linea and other EVM-compatible networks. TA does not qualify as an electronic money token (EMT) or asset-referenced token (ART) as defined by MiCAR. It is not backed by fiat currency, commodities, or other assets, and does not aim to maintain a stable value.

Furthermore, TA is not categorized as a financial instrument, deposit, insurance product, pension product, or any other regulated financial product under EU law. It does not confer ownership rights, profit claims, or contractual entitlements, and therefore remains outside the scope of frameworks applicable to traditional financial instruments.

F.2 Crypto-Asset Functionality:

TA is the native utility token of the TRUSTA AI Prover Network. It is currently used for:

Payment for Identity and Attestation Services: End users and projects pay in $TA when requesting Proof of Humanity, Sybil detection, or reputation attestations (e.g., MEDIA score).

Staking for Network Participation: Issuers, verifiers, and AI infrastructure providers are required to stake $TA to qualify for providing services within the Trusta identity network.

Ecosystem Incentives and Rewards: Contributors (e.g., attesters, validators, and AI agents) are incentivized with $TA for active participation, ensuring reliability and decentralization of the network.

Governance Rights: Holders of $TA may participate in protocol-level governance through signaling and parameter proposals. These rights are limited to technical and ecosystem decisions and do not confer ownership, revenue claims, or legal entitlements of any kind. $TA does not confer any ownership rights, profit claims, or legal entitlements. Governance rights are procedural and executed on-chain, without affecting the issuer's corporate control.

F.3 Planned Application of Functionalities:

Future functionalities of TA may include:

- Access to DAO voting and grant proposal modules (Q4 2025)
- Cross-chain staking and proving rewards across supported L2 networks

All future extensions are subject to governance proposals and will be disclosed through official channels. No additional financial rights or instruments will be attached to TA.

F.4 Type of white paper: OTHR

F.5 The type of submission: NEWT

F.6 Crypto-Asset Characteristics:

TA is an ERC-20 compatible utility token with a fixed maximum supply of 1,000,000,000 tokens. The token is fungible, transferable, and not linked to any off-chain asset or claim. No minting or burning is permitted outside the scope of protocol governance.

F.7 Commercial name or trading name: TRUSTA AI Token (TA)

F.8 Website of the issuer: trustalabs.ai

F.9 Starting date of offer to the public or admission to trading: 2025-11-24

F.10 Publication date: 2025-11-24

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 Code used to uniquely identify the crypto-asset or each of the several crypto assets to which the white paper relates, where available: N/A

F.14 Functionally Fungible Group Digital Token Identifier, where available: N/A

F.15 Voluntary data flag: false

F.16 Personal data flag: false

F.17 LEI eligibility: true

F.18 Home Member State: IE

F.19 Host Member States: AT, BE, BG, HR, CY, CZ, DK, EE, FI, FR, DE, EL, HU, IS, IT, LI, LV, LT, LU, MT, NL, NO, PL, PT, RO, SK, SI, ES, SE

G. Information on the rights and obligations attached to the crypto-assets

G.1 Purchaser Rights and Obligations: Holders of TA tokens do not acquire any ownership rights, profit entitlements, or contractual claims against the issuer. TA confers functional utility within the TRUSTA AI network, including access to protocol services and participation in governance signaling. All rights are procedural and executed via smart contracts. Purchasers are responsible for their own custody arrangements and compliance with applicable laws.

G.2 Exercise of Rights and obligations:

Rights associated with TA—such as paying for services or participating in protocol signaling—are exercised through interaction with smart contracts on supported blockchain networks. There is no centralized intermediary or legal enforcement mechanism. Users must have a compatible wallet and follow the technical procedures established by the protocol to use such features.

G.3 Conditions for modifications of rights and obligations:

As a decentralized protocol, the TRUSTA AI network may evolve over time through governance processes. Changes to token utility or protocol features may be proposed and enacted via community signaling mechanisms encoded in smart contracts. There is no unilateral modification by the issuer; any updates are subject to open governance coordination and public disclosure.

G.4 Future Public Offers:

There are currently no planned future public offerings of TA disclosed in this white paper. Any subsequent distributions or emissions will be subject to community governance or previously disclosed release schedules. Admission to trading on compliant platforms is intended following the Token Generation Event (TGE), but listing is not guaranteed at the time of this publication.

G.5 Issuer Retained Crypto-Assets: 410000000

G.6 Utility Token Classification: true

G.7 Key Features of Goods/Services of Utility Tokens:

TA is a utility token that grants access to the core services of the TRUSTA AI network. It enables users to:

- Payment for Identity and Attestation Services
- Staking for Network Participation
- Ecosystem Incentives and Rewards
- Governance Rights

TA does not confer ownership, profit-sharing, or legal rights over Tra labs Inc. or the Trusta AI network. Its functionalities are technical in nature, executed through smart contracts, and do not amount to financial claims.

G.8 Utility Tokens Redemption:

Redemption of the $TA utility tokens occurs through Tra Labs' decentralized application (dApp) and integrated partner platforms.
Users may connect their verified wallets to the platform and spend $TA tokens to access or unlock specific functionalities, including:
• Identity and Reputation Services: redeem tokens to issue or verify on-chain attestations via TrustaScan and TrustaGo.
• Platform Access and Premium Features: use tokens to activate enhanced analytics, API access, or governance-related functions.
• Ecosystem Incentives: participate in staking, reward, or verification campaigns within supported blockchain ecosystems.

All redemptions are executed on-chain through smart contracts, ensuring transparency and traceability. The redemption process is non-custodial, meaning users maintain full control of their wallets and tokens at all times.

G.9 Non-Trading request: true

G.10 Crypto-Assets purchase or sale modalities: N/A

G.11 Crypto-Assets Transfer Restrictions:

TA tokens are, by design, freely transferable on supported blockchain networks..

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:

The legal relationship between token purchasers and the issuer shall be governed by the laws of the Republic of Panama, where the issuer is incorporated. Additional legal obligations may apply under the laws of jurisdictions where the token is distributed or traded through licensed platforms.

G.19 Competent court: Any disputes arising between the issuer and purchasers of TA tokens in relation to this offering shall fall under the exclusive jurisdiction of the

competent courts of the Republic of Panama, unless otherwise agreed by contract or enforced through platform-specific arbitration rules.

H. Information on the Underlying Technology

H.1 Distributed ledger technology:

TA is issued as an ERC-20 token on the Linea blockchain and is compatible with other EVM-based chains such as Binance Smart Chain and Polygon. TRUSTA AI does not operate its own L1 or L2 chain. Instead, it coordinates a decentralized proving network off-chain, while settlement and token logic occur on Ethereum-compatible networks. The network leverages public blockchain infrastructure to ensure transparent, tamper-proof interactions between staking, proof submission, and reward mechanisms.

H.2 Protocols and technical standards:

The TA token adheres to the ERC-20 token standard and is deployed using audited smart contracts written in Solidity. The protocol utilizes Ethereum Virtual Machine (EVM) compatibility to support multi-chain interactions.

H.3 Technology Used:

Trusta AI leverages a hybrid technological stack combining blockchain, AI/ML, and privacy-preserving computation to provide verifiable identity and reputation services for both humans and AI agents.

Blockchain Infrastructure:

Multi-chain deployment across Ethereum, Linea, Solana, BNB Chain, TON, and Scroll, with plans to expand to additional L1/L2 ecosystems.

Smart contracts deployed for Proof of Humanity (PoH) and attestation issuance based on the Linea Verax framework.

AI & Machine Learning:

Behavior Fingerprint Technology: Proprietary AI/ML algorithms perform graph mining and clustering on asset transfer graphs and behavioral sequences to detect Sybil communities and enhance identity recognition.

Reputation & Credit Scoring: MEDIA framework aggregates on-chain behavior into Monetary, Engagement, Diversity, Identity, and Age dimensions, creating quantifiable scores.

Sybil Detection Models: Multi-phase ML framework combining Louvain/K-core community detection with K-means clustering for precision fraud prevention.

All interaction is permissionless, transparent, and verifiable through Ethereum-based interfaces.

H.4 Consensus Mechanism:

The underlying blockchain for TA is Ethereum, which uses a Proof-of-Stake (PoS) consensus mechanism maintained by network validators. TRUSTA AI itself does not maintain a consensus layer but relies on Ethereum and other EVM-compatible chains for finality and settlement. For off-chain proof coordination, TRUSTA AI uses cryptographic signatures, zk range proofs, and commit/reveal schemes rather than a native consensus protocol.

H.5 Incentive Mechanisms and Applicable Fees:

Users are incentivized to participate in the TRUSTA AI network through the following mechanisms:

- TA rewards for staking and participating in verifiable off-chain proof strategies

- Prover Node operators earn TA based on successful proof generation and verification

- Users contributing bandwidth or compute resources through zkEarn modules are rewarded in TA

All rewards are issued according to on-chain rules defined in staking and incentive contracts. Transaction fees (gas) are payable to the Ethereum network; TRUSTA AI does not impose additional off-chain platform fees.

H.6 Use of Distributed Ledger Technology: true

H.7 DLT Functionality Description:

TA and all associated protocol components (e.g., zkStaking, token vesting, governance signaling) are deployed as smart contracts on Ethereum. The project uses distributed ledger technology (DLT) to record token balances, facilitate transfers, enforce vesting schedules, and verify zero-knowledge proof results on-chain. TRUSTA AI does not operate its own consensus mechanism but relies on Ethereum for decentralization, immutability, and transaction finality.

H.8 Audit: true

H.9 Audit outcome:

The token smart contracts have been audited by Slowmist. The audit reported no critical vulnerabilities. Minor and medium-level issues were identified and fully remediated prior to deployment.

Report Link:
https://github.com/slowmist/Knowledge-Base/blob/master/open-report-V2/smart-contract/TrustaOFT%20TA%20token%20-%20SlowMist%20Audit%20Report.pdf

I. Information on Risks

I.1 Offer-Related Risks:

Market Volatility Risk: The value of crypto-assets may be highly volatile due to rapid market fluctuations, speculative trading, changes in sentiment, and broader macroeconomic factors.

Liquidity Risk: Limited secondary market activity or the absence of a regulated trading venue may reduce the ability of holders to sell or transfer crypto-assets at a desired price or time.

Technology and Operational Risks: The issuance, transfer, and management of crypto-assets rely on blockchain or distributed ledger technology (DLT), which may be subject to operational failures, bugs, cyberattacks, or network outages.

Cybersecurity Risk: Unauthorized access to wallets, smart contracts, or related infrastructure may result in the loss or theft of crypto-assets.

Regulatory Risk: Regulatory actions, restrictions, or evolving legal interpretations at the EU or national level may impact the offer or trading of crypto-assets, including their classification, taxation, or compliance obligations.

No Guarantee of Return: Crypto-assets typically do not confer ownership, profit participation, or other financial rights, and their value is not guaranteed by any entity or backed by tangible assets.

Technology Obsolescence: Innovations or upgrades in DLT or competing crypto-asset ecosystems may render the offered crypto-asset less relevant or functional over time.

Counterparty Risk: The offer may involve third-party service providers (e.g., trading platforms, custodians, or distributors), whose failure to meet obligations or maintain solvency could negatively impact token delivery, trading access, or investor recourse.

I.2 Issuer-Related Risks: N/A

I.3 Crypto-Assets-related Risks:

Technological Risk: The crypto-assets are based on blockchain or distributed ledger technology (DLT), which may contain vulnerabilities, bugs, or design flaws. Failures in the underlying protocol or smart contracts may compromise the operation, availability, or security of the crypto-assets.

Cybersecurity Risk: Crypto-assets and their associated infrastructure are exposed to risks such as hacking, phishing, key theft, or denial-of-service attacks. Loss or theft of private keys or unauthorized access to digital wallets may result in the irreversible loss of assets.

Lack of Legal Certainty: The legal classification and enforceability of rights associated with crypto-assets remain evolving in many jurisdictions. This includes uncertainty around whether specific crypto-assets confer ownership, utility, access rights, or are treated as financial instruments or e-money under applicable law.

No Intrinsic Value or Backing: Crypto-assets may not be backed by physical assets, legal claims, or guaranteed returns. Their value depends largely on user demand, market perception, and ecosystem adoption, which can fluctuate rapidly or diminish entirely.

Interoperability Risk: The crypto-assets may not be compatible with other networks, wallets, or platforms, which may limit their utility or transferability within broader digital ecosystems.

Fork and Upgrade Risk: The blockchain or protocol supporting the crypto-assets may undergo contentious upgrades, forks, or governance changes, which could split the network, affect asset functionality, or create duplicate assets with uncertain status.

Liquidity and Market Risk: The secondary market for the crypto-assets may be underdeveloped, liquid, or susceptible to manipulation. This may impact price discovery and the ability to exit positions at fair value.

Misuse Risk: Crypto-assets may be used for illicit purposes, such as fraud, money laundering, or circumventing regulations. While measures may be in place to mitigate such risks, they cannot be eliminated entirely.

Counterparty Risk: Users interacting with the crypto-asset ecosystem may rely on third-party services (e.g., custodians, liquidity providers, bridges). These counterparties may default, be compromised, or behave maliciously, leading to asset loss or reduced functionality.

I.4 Project Implementation-Related Risks:

Delays and Execution Risk:
There is a risk that the project may not be implemented in accordance with its planned roadmap or timeline. This may be due to technical, operational, or financial constraints, or other unforeseen circumstances. Such delays may negatively impact the utility or value of the crypto-asset.

Technical Development Risk:
The development of the project's underlying infrastructure, smart contracts, or protocols may encounter unforeseen bugs, vulnerabilities, or integration challenges. Inadequate testing or failed upgrades may disrupt service availability or compromise user trust.

Funding and Resource Risk:
Project implementation depends on sufficient financial and human resources. In the event of insufficient funding, talent attrition, or resource misallocation, the project may fail to deliver critical components, resulting in reduced adoption or functionality.

Third-Party Dependency Risk:
Implementation may rely on third-party service providers, including cloud infrastructure, security auditors, blockchain middleware, oracles, or tooling partners. The failure or unavailability of these counterparties may delay or hinder project progress.

Market Adoption Risk:
Even if the project is implemented as planned, there is no guarantee that users, developers, or partners will adopt or use the solution. Lack of traction may lead to reduced utility, liquidity, or relevance of the crypto-asset.

Regulatory and Legal Risk:
Legal or regulatory changes during implementation may require adjustments to the project's architecture, operations, or token economics. This could result in delays, additional costs, or the need to re-evaluate the project's viability.

I.5 Technology-Related Risks:

Smart Contract Vulnerabilities:
The crypto-asset and associated functionality may rely on smart contracts, which are subject to coding errors, logic flaws, or vulnerabilities. Even with external audits, there is no guarantee that smart contracts are free of exploitable bugs, which may result in financial loss, malfunction, or unauthorized access.

Blockchain Network Risks:
The operation of the crypto-asset depends on the underlying blockchain infrastructure (e.g., Ethereum, Solana). Risks such as network congestion, high transaction fees, reorgs, or consensus failures may affect performance, reliability, or availability.

Protocol Upgrade Risk:
Changes or upgrades to the protocol or blockchain (e.g., hard forks, software patches) may cause service disruptions, compatibility issues, or unintended behavior. If poorly managed, such events may impact token holders or users.

Cybersecurity Risk:
The project may be targeted by malicious actors through phishing, hacking, denial-of-service attacks, or other exploits. Breaches could result in data theft, asset loss, or loss of user confidence.

Interoperability Risk:
If the project depends on cross-chain functionality or integrations with external protocols, failures in those third-party systems could compromise the reliability or security of the technology.

Data Availability and Storage Risks:
If off-chain data storage or indexing services are used (e.g., IPFS, The Graph, or centralized cloud providers), downtime or data loss could affect access to key information or features.

Reliance on Open-Source Code:
The project may use open-source software libraries or frameworks that could contain undiscovered vulnerabilities or be deprecated without warning. Such dependencies may increase operational risk.

Centralization Risk in Technical Infrastructure:
If critical components (e.g., nodes, APIs, oracles) are operated by a small number of entities or hosted on centralized services, this may introduce single points of failure or censorship risk.

I.6 Mitigation measures:

Smart Contract Audits:
All critical smart contracts undergo internal reviews and are audited by reputable third-party security firms to identify and address vulnerabilities before deployment.

Modular and Upgradable Architecture:
Where possible, the system is designed to allow for upgrades through governance or versioning mechanisms, enabling rapid response to critical bugs or changes in requirements.

Blockchain Selection and Network Redundancy:
The underlying blockchain is chosen for its security, decentralization, and proven reliability. Measures are in place to monitor for network instability and maintain service continuity.

Cybersecurity Best Practices:
Infrastructure and development practices follow industry standards for secure key management, access control, encryption, and regular penetration testing.

Monitoring and Incident Response:
Automated monitoring tools are used to detect abnormal activity, and predefined incident response protocols allow for timely action in case of technical or security events.

Third-Party Risk Management:
Dependencies on external services (e.g., oracles, cross-chain bridges) are evaluated carefully, and redundant or diversified solutions are used where feasible.

Open-Source and Community Review:
Codebases are made publicly available for transparency and peer review, encouraging community feedback and faster identification of potential issues.

Decentralization and Infrastructure Resilience:
Where possible, efforts are made to reduce reliance on centralized infrastructure (e.g., node providers or APIs), using decentralized alternatives and deploying across multiple geographic locations and providers.

J. Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts

S.1 Name: Tra labs Inc.

S.2 Relevant legal entity identifier: 875500M35DIQIG1P8B92

S.3 Name of the crypto-asset: TRUSTA AI Token

S.4 Consensus Mechanism:

The underlying blockchain for TA is Ethereum, which uses a Proof-of-Stake (PoS) consensus mechanism maintained by network validators. TRUSTA AI itself does not maintain a consensus layer but relies on Ethereum and other EVM-compatible chains for finality and settlement. For off-chain proof coordination, TRUSTA AI uses cryptographic signatures, zk range proofs, and commit/reveal schemes rather than a native consensus protocol.

S.5 Incentive Mechanisms and Applicable Fees:

Users are incentivized to participate in the TRUSTA AI network through the following mechanisms:

- TA rewards for staking and participating in verifiable off-chain proof strategies

- Prover Node operators earn TA based on successful proof generation and verification

- Users contributing bandwidth or compute resources through zkEarn modules are rewarded in TA

All rewards are issued according to on-chain rules defined in staking and incentive contracts. Transaction fees (gas) are payable to the Ethereum network; TRUSTA AI does not impose additional off-chain platform fees.

S.6 Beginning of the period to which the disclosure relates: 2025-07-31

S.7 End of the period to which the disclosure relates: 2026-07-30

S.8 Energy consumption: 7,3 kWh

S.9 Energy consumption sources and methodologies:

Estimates are based on publicly available data and sustainability studies published by the Ethereum Foundation, Crypto Carbon Ratings Institute (CCRI, 2023), and independent validator energy profiling reports.
The energy consumption attributable to $TA is calculated proportionally to its transaction volume and smart contract interactions on the Ethereum Proof-of-Stake

(PoS) network.

For reference, Ethereum's post-Merge energy footprint is estimated at approximately 0.0026 kWh per transaction (source: CCRI 2023).

Based on an estimated 2.8–3.0 million on-chain transactions and attestations annually across the Trusta / Tra Labs ecosystem, the total annual energy consumption attributable to $TA is therefore approximately:

2.8M transactions × 0.0026 kWh ≈ 7.3 kWh per year

This methodology assumes proportional network usage, averaged validator energy efficiency, and does not include off-chain computation or data storage.