Project name XYO
White paper

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

This crypto-asset white paper has not been approved by any competent authority in any Member State of the European Union.

N	Field	Content
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01	Date of notification	2025-07-24
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	‘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) 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.
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	XYO’s native crypto-asset, “XYO” or the “XYO token”, is a utility token designed to support the XYO Network, which provides a trustless cryptographic location and data network. The XYO token has no rights or obligations within the XYO Network. It does not grant governance powers, enforceable claims, or guarantees of utility.
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	XYO is being admitted to trading on crypto-asset trading platforms in accordance with Regulation (EU) 2023/1114 (MiCA). This admission aims to facilitate broader access and liquidity in a regulated framework. The names of the trading platforms for which admission is sought are: Coinbase, Kraken, Gate.com, Gate.io, Crypto.com, Binance, Bitget, Bitvavo, Bybit, KuCoin, MEXC, HTX, BingX, BitMart, Bithumb, DigiFinex, Bitpanda, Coinstore, OKX, Upbit, LCX Exchange, CoinDCX, Biconomy, XT.com
I.1	Offer-Related Risks	Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. do not operate, control, supervise, or manage any trading platforms or crypto-asset exchanges where XYO tokens may be admitted to trading. When XYO token holders engage in transactions—buying or selling XYO—on such platforms, Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. are not a party to those transactions. As such: Any legal relationship between XYO token holders and a trading platform is governed exclusively by the terms and conditions of that platform. Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. assume no responsibility or liability for the services, operations, security, performance, or outcomes (financial or otherwise) of any trading activities involving XYO on these platforms. Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. offer no guarantees or assurances regarding the regulatory compliance, operational resilience, financial solvency, or technical performance of any trading platform. Failures in these areas—including platform downtime, insolvency, sanctions, or cessation of operations—may result in partial or total losses for XYO token holders. ■ Pausing and Delisting Risk Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc.make no assurance that XYO will remain listed or tradable on any specific trading platform. Platforms may pause, delist, or otherwise restrict trading at their discretion or due to regulatory or operational issues. In such cases: XYO holders may encounter reduced liquidity, diminished market access, or pricing inefficiencies. Delisting or prolonged suspension may adversely affect the market value, reputation, and demand for the XYO token. In the absence of a functioning secondary market, holders may find it difficult or impossible to sell or transfer their tokens.

		■ Trading Risk Secondary market activity in XYO tokens is not managed or controlled by Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. Accordingly: There can be no guarantee of continuous or sufficient liquidity in the secondary market for XYO. Token holders may experience price volatility, low market depth, or difficulty executing trades at desired prices. Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. do not ensure the integrity or fairness of trading environments. Market manipulation practices such as wash trading, spoofing, or front-running may occur, and while such activities may be regulated or monitored by some platforms, enforcement is inconsistent and outside the Falu Brick Commerce Limited's, the XYO Foundation's and XY Labs Inc.'s control. ■ Operational and Technical Risk Trading platforms typically provide centralized services, including custody, order execution, and settlement. These models present inherent operational and counterparty risks, such as: Technical failures, cyberattacks, or internal system errors may result in the loss of user assets or delays in execution. Most trading activity is conducted off-chain via the platform's internal ledger, meaning trades are not always transparently recorded on the public blockchain. Users may be required to deposit XYO tokens into custodial wallets controlled by the platform, thereby assuming the risk of deposit or withdrawal failure, mismanagement, or hacking. Assets may be co-mingled with other users' funds in shared wallets, increasing the risk of loss or theft due to the concentration of custody. ■ Unanticipated Risks In addition to the risks specifically described above, XYO token holders should be aware that unforeseen risks may emerge. This includes previously unknown vulnerabilities in trading infrastructure, changes in regulatory treatment, or complex interactions between the risks identified in this section. Such risks may lead to significant financial or operational consequences for XYO token holders.

I.2	Issuer-Related Risks	Abandonment or Lack of Success Risk There is a risk that the development or continuation of the XYO project may be partially or fully discontinued. This may result from a variety of factors, including but not limited to: insufficient public interest, inadequate funding, the incapacitation or unavailability of key contributors, force majeure events (such as war, pandemics, or natural disasters), or a failure to achieve commercial viability. Any of these factors could materially and adversely affect the progress or sustainability of the XYO Network. ■ Project Evolution Risk The XYO project may evolve over time due to regulatory changes, market conditions, technological innovation, or strategic direction. Such evolution could result in changes to the Network's original vision or implementation roadmap. While adaptation may promote innovation and resilience, it also introduces the risk of diverging from previous expectations, potentially affecting token utility, perception, or market value. ■ No Network Control Risk Interactions with the Network—whether through staking, data contribution, or utility functions—occur between token holders and the protocol, or with third parties not affiliated with Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. Accordingly, Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc.assume no responsibility or liability for the outcomes of such interactions. ■ Partner Withdrawal Risk The development and operation of the XYO Network depend on third-party partnerships, technical collaborators, and service providers. Any deterioration, withdrawal, or loss of key partners may result in project delays, reduced functionality, or the collapse of critical infrastructure. Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. cannot guarantee the uninterrupted or successful development of the Network in the absence of these relationships. ■ Legal and Regulatory Compliance Risk Crypto-assets operate in a rapidly evolving regulatory environment. Legal frameworks differ significantly between jurisdictions and may change over time. Changes in law or regulation may impact the legality, trading availability, or taxation of XYO, and may increase compliance costs for Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. Regulatory non-compliance could result in investigations, enforcement actions, financial penalties, or restrictions on the issuance, holding, or trading of XYO tokens. Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. may also be exposed to private litigation risk.

		■ Operational Risk Failures in Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. internal processes, governance, technology infrastructure, or human resources may lead to disruption of services, financial loss, or reputational damage. Ineffective internal controls, procedural lapses, or system failures could impair the Falu Brick Commerce Limited's, the XYO Foundation's and XY Labs Inc's. ability to support the broader project effectively. ■ Industry Competition Risk The blockchain and location-data sectors are highly competitive and subject to rapid technological advancement. Competing projects may have similar objectives to XYO and may benefit from greater financial resources, technical talent, or market recognition. The XYO project may struggle to gain or retain market share, which could impact adoption and token value. ■ Reputational Risk Negative publicity—arising from technical issues, association with illicit activity, regulatory action, or project underperformance—may harm the reputation of the Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. and the broader XYO Network. This could reduce market confidence and adversely impact token acceptance and liquidity. ■ Key Personnel Risk The success of the XYO project is partially dependent on the leadership, experience, and continued involvement of a small number of individuals. Loss of key personnel may impair strategic execution, delay technical development, or reduce stakeholder trust. ■ Internal Control Risk Deficiencies in t Falu Brick Commerce Limited's, the XYO Foundation's and XY Labs Inc.'s internal control framework may result in operational inefficiencies, security vulnerabilities, or governance failures. Such weaknesses could negatively impact the project's sustainability, credibility, and regulatory posture. ■ Fraud and Mismanagement Risk Any instance of fraudulent conduct, abuse of authority, or serious mismanagement within Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. could undermine the integrity of the project, impair token utility, or damage the trust of stakeholders. These risks, while not currently observed, are inherent to any organization. ■ Unsolicited Listing Risk XYO tokens may be listed or traded on third-party platforms without the

		involvement, request, or approval of Falu Brick Commerce Limited, the XYO Foundation or XY Labs Inc. Such listings do not constitute endorsement or verification of the legal, technical, or regulatory suitability of the platforms involved. Users engaging with XYO tokens on unverified exchanges do so at their own risk. ■ Unanticipated Risks In addition to the risks outlined above, the XYO project may be exposed to unforeseen or emerging risks not currently known or identifiable. These may include new regulatory developments, novel attack vectors, or unique combinations of the risks listed in Sections I.1 to I.5.
I.3	Crypto-Assets-related Risks	Market Volatility Risk Crypto-assets, including XYO tokens, are inherently volatile and subject to rapid and significant fluctuations in market value. This volatility may arise from various factors, including but not limited to: supply and demand dynamics, investor sentiment, global market trends, macroeconomic conditions, technological developments, and regulatory changes. Additionally, media coverage and speculation may lead to momentum pricing, potentially inflating or deflating XYO's market value without corresponding changes in its underlying utility or fundamentals. ■ Liquidity Risk XYO tokens may be subject to low liquidity or shallow secondary markets on certain platforms. Limited trading volumes can lead to increased price slippage and difficulty executing buy or sell orders at desired prices, particularly during periods of heightened volatility. A lack of liquidity may impede holders' ability to manage positions effectively and increase the risk of value loss during adverse market conditions. ■ Solvency and Collateral Risk Holders who use XYO tokens in leveraged positions or as collateral for loans are exposed to the risk of sudden value depreciation. A significant price drop could result in margin calls, forced liquidations, or insolvency events for token holders. This may trigger a downward spiral in token price, exacerbating market instability and leading to further losses. ■ Custodial Risk The security and reliability of XYO token storage depends on the custody method chosen by the holder. Whether stored in hot wallets, cold wallets, or through centralized custodians, there are inherent risks of technical malfunction, cyberattack, mismanagement, or loss of private keys. Custodial failures may result in the partial or total loss of access to XYO tokens. ■ Scam and Fraud Risk

		XYO token holders are exposed to the risk of scams and fraudulent schemes perpetrated by malicious actors. These may include phishing attacks, impersonation of Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. or its affiliates, counterfeit token sales or airdrops, and social engineering efforts on email or social platforms. Engaging with unofficial channels or contracts may lead to financial loss or asset theft. ■ Anti-Money Laundering / Counter-Terrorism Financing (AML/CTF) Risk XYO tokens, like other crypto-assets, may be misused for illicit purposes, including money laundering or terrorist financing. If an address holding XYO tokens is linked to suspicious activity or flagged by authorities or service providers, the associated tokens may be frozen or restricted. Holders may face legal or operational consequences even if they were unaware of such activity. ■ Taxation Risk The tax treatment of holding, trading, or receiving XYO tokens varies by jurisdiction and may be subject to change. XYO token holders are individually responsible for understanding and complying with applicable tax obligations, including but not limited to income, capital gains, or wealth tax. Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. cannot provide tax advice and makes no assurances regarding the tax implications of XYO transactions. ■ Market Abuse Risk Crypto-asset markets are still developing and may lack consistent oversight. As a result, trading activity may occur in environments that are vulnerable to market abuse, including front-running, wash trading, spoofing, pump-and-dump schemes, or coordinated manipulation. These practices can distort the price and perceived value of the XYO token. Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. do not monitor or control such activity and assumes no liability for its effects. ■ Legal and Regulatory Risk Regulatory frameworks for crypto-assets differ across jurisdictions and remain subject to change. XYO tokens may be treated differently under various national laws—potentially being classified as securities, financial instruments, or payment assets—each of which may impose distinct compliance obligations. New regulations may increase the Falu Brick Commerce Limited’s, the XYO Foundation’s and XY Labs Inc.’s operational and legal burdens. Certain jurisdictions may restrict, prohibit, or otherwise regulate the use, sale, or transfer of XYO tokens.

		In extreme cases, regulatory actions could render the XYO token non-functional or illegal to trade. Regulatory enforcement or litigation may expose Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. or its personnel to financial or legal penalties, including fines or operational restrictions. ■ Unanticipated Risks In addition to the risks described above, unforeseen risks may emerge. These may result from unexpected combinations of market, technical, or legal risks, or from unknown vulnerabilities in third-party infrastructure or blockchain protocols. Such risks may materially impact the functionality, value, or accessibility of the XYO token.
I.4	Project Implementation-Related Risks	■ Novel Ecosystem Risk The XYO ecosystem is based on emerging and evolving technologies, including decentralized networks, smart contracts, and blockchain infrastructure. As with any novel technology stack, these components are inherently subject to operational and technical risk. While the XYO Network is designed to be robust, there is no guarantee that receiving, using, or holding XYO tokens will be uninterrupted, secure, or error-free. Despite the use of best practices and, where applicable, third-party audits, the underlying blockchain protocols, smart contracts, or related software may still contain undetected vulnerabilities, bugs, or incompatibilities. Such flaws could result in unintended behavior, critical system failures, or security breaches, potentially leading to the partial or total loss of token functionality or value. Moreover, unforeseen technical limitations or the emergence of superior competing technologies could undermine the long-term sustainability or competitiveness of the XYO ecosystem. ■ Competition Risk The XYO project operates in a highly competitive environment, with many blockchain networks and location-based data platforms pursuing similar goals. Existing and future competitors may possess significantly greater financial, technical, regulatory, or marketing resources. The ability of Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. to compete effectively is uncertain. Increased competition may diminish the adoption, utility, or market value of the XYO token and could negatively impact the viability or credibility of the broader project. ■ Dependency Risk The XYO Network relies on third-party infrastructure and underlying blockchain platforms—including Ethereum, Polygon, Solana, Base, and Arbitrum—to support

		token issuance, transfers, staking, and smart contract execution. Any failure, performance degradation, or regulatory disruption affecting these networks could directly impact the functionality, availability, or value of XYO tokens. Additionally, modifications to consensus mechanisms, fee structures, governance models, or security assumptions on these underlying platforms may introduce new systemic risks or unintended consequences for the XYO ecosystem. ■ Suitability and Warranty Risk The XYO Network, the token, and associated smart contracts are provided on an "as is" and "as available" basis without warranties of any kind. Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. expressly disclaims all implied warranties, including but not limited to those of merchantability, fitness for a particular purpose, title, and non-infringement. There is no assurance that the XYO token, its issuance contracts, or the supporting infrastructure will be secure, reliable, error-free, or continuously functional. Users accept full responsibility for the risks associated with interacting with the XYO ecosystem and must determine whether its functionality meets their individual needs or expectations. ■ Unanticipated Risks In addition to the risks identified above, users should be aware that unanticipated or emerging risks may arise as the XYO ecosystem evolves. These may include unexpected combinations of technical, regulatory, or operational vulnerabilities, as well as risks stemming from dependencies on third-party infrastructure or rapidly changing market conditions.
I.5	Technology-Related Risks	Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc., including their affiliates, directors, officers, employees, and team members assumes no responsibility or liability for any damages, losses, costs, fines, penalties, or expenses—whether foreseeable or not—that may arise in connection with the technical risks described in this section, or from any combination thereof. ■ General Cybersecurity Risk The XYO token operates within a digital and decentralized technological environment that remains inherently vulnerable to cyber threats. Despite reasonable security measures, various components of the ecosystem—including blockchain infrastructure, smart contracts, user wallets, and interfacing applications—may be targeted by malicious actors. Such risks include, but are not limited to: Unauthorized access via compromised private keys Hacking of blockchain protocols

		Smart contract exploits Phishing attacks Malware or ransomware deployments As these threats continue to evolve, some may be undetectable or irremediable until substantial damage has occurred, potentially resulting in the loss, theft, or unauthorized transfer of XYO tokens. ■ Blockchain-Level Risk XYO is deployed on multiple distributed ledger technologies (DLTs), such as Ethereum, Solana, Polygon, Arbitrum, and Base. These underlying networks are themselves susceptible to consensus-related threats, including: 51% attacks Double-spending exploits Censorship or transaction ordering manipulation Unintentional or contentious hard forks Such events may disrupt transaction finality, alter token balances, or affect smart contract execution, thereby undermining the reliability and value of the XYO token. ■ Smart Contract-Level Risk XYO token issuance and transfers are governed by smart contracts, particularly on Ethereum and compatible EVM-based chains. These contracts are immutable once deployed and carry technical risks, including: Programming errors or logic flaws Vulnerabilities such as reentrancy, overflows, or improper access controls Incompatibility with future blockchain updates (e.g., gas model or opcode changes) Any malfunction or exploit could result in token misallocation, locked funds, or contract-level failures. Resolving such issues may require complex governance actions, hard forks, or contract migrations—none of which are guaranteed to succeed or be broadly supported.

		■ Network-Level Risk The XYO Network itself, including its planned Layer One infrastructure, may be vulnerable to technical disruptions or design flaws. These may include: Smart contract failures or oracle manipulation Governance mechanism failures or deadlocks Disruptions to staking, reward allocation, or consensus mechanisms Such vulnerabilities may impair network functionality, affect token economics, or reduce confidence in the ecosystem. In extreme cases, these risks could result in loss of value, inaccessibility of tokens, or irrecoverable funds. ■ Finality and Irrevocability Risk Blockchain transactions, including XYO token transfers, are generally irreversible once confirmed. Risks associated with this include: Sending tokens to an incorrect or inactive address Loss or compromise of private keys Transfers to custodians or entities unwilling or unable to return assets Failed attempts to reverse or recover transactions due to the immutable nature of blockchain Such actions may lead to permanent loss of assets without recourse. ■ Unanticipated Risks As with any emerging technology, XYO may be exposed to unforeseen technical vulnerabilities or new threat vectors not currently identified. These risks may arise independently or as complex interactions between the categories listed in Sections I.1 through I.5, and could significantly impair token functionality, utility, or security.
I.6	Mitigation measures	Falu Brick Commerce Limited, the XYO Foundation and XY Labs Inc. have adopted a range of measures to help mitigate the risks identified in Sections I.1 through I.5. These measures include: Transparent disclosures regarding technical, operational, and market risks Rigorous testing and auditing of smart contracts and key system components

		Careful selection of personnel, advisors, and third-party service providers Ongoing monitoring of regulatory developments and industry best practices Despite these efforts, many of the risks associated with the XYO token and its supporting infrastructure are inherent to the use of blockchain technology and decentralized systems. As such, these risks cannot be fully eliminated. XYO token holders are strongly encouraged to take additional precautions based on their individual risk tolerance and chosen custody method. These may include: Using secure and reputable wallet solutions (e.g., hardware wallets for long-term storage) Implementing strong personal security practices, including safe key management Staying informed through official project communications and monitoring broader market and regulatory developments that may affect the XYO ecosystem By maintaining appropriate safeguards and remaining vigilant, XYO holders may reduce their exposure to the materialization of risks that could otherwise lead to financial or operational loss.
A.1	Name	Falu Brick Commerce Limited
A.2	Legal form	Limited Liability Company
A.3	Registered address	Faneromeni Square 76 Floor 1 1011 Nicosia Cyprus
A.4	Head office	Faneromeni Square 76 Floor 1 1011 Nicosia Cyprus
A.5	Registration Date	2019-01-02
A.6	Legal entity identifier	HE 392904 (Cyprus)

A.7	Another identifier required pursuant to applicable national law	Not applicable.
A.8	Contact telephone number	+1 (866) 200-5685
A.9	E-mail address	legal@xyo.network
A.10	Response Time (Days)	Fourteen (14) working days
A.11	Parent Company	XY Labs Inc.
A.12	Members of the Management body	Paris Gavrielides – Director Arie Trouw - Director Business Address: Faneromeni Square 76 Floor 1 1011 Nicosia Cyprus
A.13	Business Activity	Falu Brick Commerce Limited handles for the XYO Foundation the strategic projects, relationships and ecosystem support.
A.14	Parent Company Business Activity	XY Labs connects data between the real and digital worlds through blockchain, IoT, and cryptographic products.
A.15	Newly Established	Established in 2019
A.16	Financial condition for the past three years	The Falu Brick Commerce Limited is a wholly owned entity of XY Labs Inc. The Falu Brick Commerce Limited itself did not generate revenue over the last three years. All expenses of the Falu Brick Commerce Limited are reimbursed by XY Labs Inc.

		XY Labs Inc. is a reporting entity with the US Securities and Exchange Commission and its financials can be found here: 2022 – Annual Report https://www.sec.gov/Archives/edgar/data/1577351/000119312523130696/d481170dpartii.htm 2023 – Annual Report https://www.sec.gov/Archives/edgar/data/1577351/000119312524122692/d831700dpartii.htm 2024 – Annual Report https://www.sec.gov/Archives/edgar/data/1577351/000110465925042490/tm2513623d1_partii.htm Over the last 3 years the XY Labs Inc. and the XYO Foundation released a number of tools. 2022 XYO Protocol 2.0 & Client SDKs XYO 2.0 Framework & APIs XYO 2.0 Dapps & Framework Iterations XYO 2.0 Explorer & Framework Iterations 2023 XYO Module Protocol, Node Site, Netflix Project XYO Foreventory & Framework Iterations XYO Rate My NFTs & Framework Iterations XYO Platform Updates 2024 XYO Name Service & OS 2025 XYO Layer One blockchain
A.17	Financial condition since registration	Not Applicable

B.1	Issuer different from offeror or person seeking admission to trading	Not applicable
B.2	Name	Not applicable
B.3	Legal form	Not applicable
B.4	Registered address	Not applicable
B.5	Head office	Not applicable
B.6	Registration Date	Not applicable
B.7	Legal entity identifier	Not applicable
B.8	Another identifier required pursuant to applicable national law	Not applicable
B.9	Parent Company	Not applicable
B.10	Members of the Management body	Not applicable
B.11	Business Activity	Not applicable
B.12	Parent Company Business Activity	Not applicable

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 of the operator of the trading platform	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
D.1	Crypto-asset project name	XYO
D.2	Crypto-assets name	XYO
D.3	Abbreviation	XYO
D.4	Crypto-asset project description	XYO is a pioneering technology ecosystem designed to bridge the gap between the physical and digital worlds through decentralized networks. Our core mission is to empower everyone to achieve digital sovereignty—allowing users to fully own the data they generate and monetize it to their liking.
D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project	Falu Brick Commerce Limited XY Labs Inc. XYO Foundation Arie Trouw – CEO & CTO Joel Carter - Development Matt Jones - Development 740 13th Street #224 San Diego, CA 92101 USA

D.6	Utility Token Classification	Yes
D.7	Key Features of Goods/Services for Utility Token Projects	The XYO token is used to reward the contributors of the XYO Network as well as its ecosystem. It is also used for staking and security for the XYO Layer One Network
D.8	Plans for the token	Distribution to community achieved in 2018 and 2019. Usage in the XYO Network and listing on exchanges ongoing.
D.9	Resource Allocation	Resources are allocated as needed from XY Labs Inc.
D.10	Planned Use of Collected Funds or Crypto-Assets	Funds are used to promote the XYO ecosystem and its open source system.
E.1	Public Offering or Admission to trading	ATTR
E.2	Reasons for Public Offer or Admission to trading	Listing XYO on Trading Platforms ensures broad circulation of the XYO Token, thus fostering its accessibility and liquidity.
E.3	Fundraising Target	Not applicable
E.4	Minimum Subscription Goals	Not applicable
E.5	Maximum Subscription Goal	Not applicable
E.6	Oversubscription Acceptance	Not applicable

E.7	Oversubscription Allocation	Not applicable
E.8	Issue Price	Not applicable
E.9	Official currency or other crypto-assets determining the issue price	USD
E.10	Subscription fee	Not applicable
E.11	Offer Price Determination Method	Not applicable
E.12	Total Number of Offered/Traded crypto-assets	13,931,216,93 XYO
E.13	Targeted Holders	All
E.14	Holder restrictions	Not applicable
E.15	Reimbursement Notice	Not applicable
E.16	Refund Mechanism	Not applicable
E.17	Refund Timeline	Not applicable

E.18	Offer Phases	Not applicable
E.19	Early Purchase Discount	Not applicable
E.20	Time-limited offer	False
E.21	Subscription period beginning	Not applicable
E.22	Subscription period end	Not applicable
E.23	Safeguarding Arrangements for Offered Funds/crypto-assets	Not applicable
E.24	Payment Methods for crypto-asset Purchase	Not applicable
E.25	Value Transfer Methods for Reimbursement	Not applicable
E.26	Right of Withdrawal	Not applicable
E.27	Transfer of Purchased crypto-assets	Not applicable

E.28	Transfer Time Schedule	Not applicable
E.29	Purchaser's Technical Requirements	The purchaser is required to use a compatible wallet for receiving XYO.
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	Coinbase, Kraken, Gate.com, Gate.io, Crypto.com, Binance, Bitget, Bitvavo, Bybit, KuCoin, MEXC, HTX, BingX, BitMart, Bithumb, DigiFinex, Bitpanda, Coinstore, OKX, Upbit, LCX Exchange, CoinDCX, Biconomy, XT.com
E.34	Trading Platforms Market Identifier Code (MIC)	Not applicable.
E.35	Trading Platforms Access	Coinbase – https://www.coinbase.com Kraken – https://www.kraken.com Crypto.com – https://www.crypto.com OKX – https://www.okx.com Binance – https://www.binance.com Gate.com / Gate.io – https://www.gate.io Bitget – https://www.bitget.com Bybit – https://www.bybit.com

		KuCoin – https://www.kucoin.com MEXC – https://www.mexc.com HTX (formerly Huobi) – https://www.htx.com BingX – https://www.bingx.com BitMart – https://www.bitmart.com Bithumb – https://www.bithumb.com DigiFinex – https://www.digifinex.com Bitvavo – https://www.bitvavo.com Coinstore – https://www.coinstore.com Upbit – https://www.upbit.com LCX Exchange – https://www.lcx.com CoinDCX – https://www.coindcx.com Biconomy – https://www.biconomy.com XT.com – https://www.xt.com Uniswap – unidwap.org Raydium – raydium.io Orca – orca.so The list updates over time please consult these websites for up to date results https://coinmarketcap.com/currencies/xyo/#Markets https://www.coingecko.com/en/coins/xyo-network
E.36	Involved costs	Not applicable

E.37	Offer Expenses	Not applicable
E.38	Conflicts of Interest	No
E.39	Applicable law	State of Delaware, United States
E.40	Competent court	State of Delaware, United States
F.1	Crypto-Asset Type	Utility token
F.2	Crypto-Asset Functionality	The XYO token is used to reward the contributors of the XYO Network as well as its ecosystem. It is also used for staking and security for the XYO Layer One Network
F.3	Planned Application of Functionalities	All applications mentioned above are live.
F.4	Type of white paper	OTHR
F.5	The type of submission	NEWT
F.6	Crypto-Asset Characteristics	XYO is a decentralized crypto-asset classified under MiCA as an “Other Crypto-Asset.” It is deployed across multiple blockchains, including Ethereum, Polygon, Arbitrum, Base, and Solana, utilizing the ERC-20 and SPL token standards. Additional token standards may be supported in the future to enhance interoperability. The total supply of XYO is currently at 13,931,216,930 tokens, all of which were pre-minted and are fully transferable. The token is divisible up to 18 decimal places and is designed for cross-chain interoperability. XYO serves several functions within the XYO ecosystem, including use for payments, participation in decentralized finance (DeFi), non-fungible token (NFT) transactions, network rewards and ecosystem, and staking.

		XYO follows a deflationary model. It does not confer any rights to profits, claims on underlying assets, or other formal financial entitlements. The token’s value is determined by market supply and demand and it is available on both centralized and decentralized trading platforms.
F.7	Commercial name or trading name	XYO
F.8	Website of the issuer	xyo.network
F.9	Starting date of offer to the public or admission to trading	2025-07-24
F.10	Publication date	Effective or intended publication date of the white paper or of the modified white 2025-07-24
F.11	Any other services provided by the issuer	Not applicable
F.12	Identifier of operator of the trading platform	Not applicable
F.13	Language or languages of the white paper	English
F.14	Digital Token Identifier	Not applicable
F.15	Functionally Fungible Group Digital Token Identifier	Not applicable

F.16	Voluntary data flag	True
F.17	Personal data flag	Yes
F.18	LEI eligibility	False
F.19	Home Member State	Cyprus
F.20	Host Member States	Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden. The above list includes the countries from the European Economic Area ("EEA"), i.e., Iceland, Liechtenstein, and Norway. At the time of the notification of the White Paper, the Regulation (EU) 2023/1114 has not yet been incorporated into the EEA Agreement. The Offer and passporting in the countries of the EEA may not be guaranteed. Other countries might be added to MiCA in the future and shall apply here.
G.1	Purchaser Rights and Obligations	Holders of XYO tokens do not obtain any legal rights, ownership interests, or entitlements to profits, dividends, or assets of the XYO project or any related entity. The XYO token does not represent equity, debt, or any enforceable claim against any person or organization. Token holders may utilize XYO exclusively within the XYO ecosystem for its designated functions, including making payments, participating in decentralized finance (DeFi) applications, and engaging in future governance voting mechanisms. Additionally, the XYO token serves as a core utility within the XYO Network, facilitating the reward of network contributors and supporting the security and staking mechanisms of the XYO Layer One infrastructure.
G.2	Exercise of Rights and obligations	See part G.1
G.3	Conditions for modifications of rights and obligations	At the current stage, no predefined conditions exist for altering the governance rights or obligations of XYO token holders.

G.4	Future Public Offers	Not applicable
G.5	Issuer Retained Crypto-Assets	662,930,279 XYO as of 2024-12-31
G.6	Utility Token Classification	True
G.7	Key Features of Goods/Services of Utility Tokens	The XYO token is used to reward the contributors of the XYO Network as well as its ecosystem. It is also used for staking and security for the XYO Layer One Network
G.8	Utility Tokens Redemption	The XYO token can be used to compensate contributors, buy data and services in the XYO Network.
G.9	Non-Trading request	True
G.10	Crypto-Assets purchase or sale modalities	Not applicable
G.11	Crypto-Assets Transfer Restrictions	Not applicable
G.12	Supply Adjustment Protocols	False
G.13	Supply Adjustment Mechanisms	Not applicable
G.14	Token Value Protection Schemes	False

G.15	Token Value Protection Schemes Description	Not applicable
G.16	Compensation Schemes	False
G.17	Compensation Schemes Description	Not applicable
G.18	Applicable law	The State of Delaware, USA
G.19	Competent court	The State of Delaware, USA
H.1	Distributed ledger technology	The XYO token was issued on the Ethereum blockchain, a public and permissionless distributed ledger technology (DLT) utilizing the Proof of Stake (PoS) consensus mechanism. Ethereum is a Turing-complete, smart contract–capable blockchain, enabling secure execution of token-related functions through ERC-20 smart contracts. Since launch XYO was bridged to similar layer-1 and layer-2 blockchains like Solana, Base, Arbitrum, Polygon, and potentially others in the future. XYO leverages Ethereum's established infrastructure for issuance, transfers, staking mechanisms, and reward distribution. Additionally, the XYO Layer One blockchain is under development to serve as a native, purpose-built blockchain that enhances the security and scalability of the XYO ecosystem. This Layer One Network will utilize its own distributed consensus system.
H.2	Protocols and technical standards	The XYO token is implemented using the ERC-20 standard on the Ethereum blockchain, which defines a set of rules for fungible token behavior, including transferability, balance tracking, and approval mechanisms. This standard ensures compatibility with widely used Ethereum wallets, decentralized applications (dApps), and exchanges. XYO also utilizes standard Ethereum smart contract protocols, written in Solidity, and deployed on the Ethereum Virtual Machine (EVM). These contracts manage functions such as token distribution, staking, and reward allocation. In addition to Ethereum protocols, the broader XYO Network incorporates:

		Proof of Origin, Proof of Location and Bound Witness protocols for cryptographic validation of location data. Sentinels, Bridges, Archivists and Diviners components for data collection, relay, storage and verification. XYO plans to launch the XYO Layer One blockchain to mainnet.
H.3	Technology Used	Blockchain and web2 technologies for interoperability and performance.
H.4	Consensus Mechanism	The XYO token is deployed on multiple public blockchains, each of which uses its own underlying consensus mechanism: Ethereum (primary deployment): Utilizes Proof of Stake (PoS) via the Ethereum Beacon Chain, where validators are randomly selected to propose and attest to blocks, ensuring decentralized consensus. Polygon: A Layer 2 scaling solution that uses a PoS-based consensus model with a validator set managing checkpointing to Ethereum. Arbitrum and Base: Both are Ethereum Layer 2 rollups that rely on Ethereum's Layer 1 security and consensus, using optimistic rollup technology and fraud proofs to finalize state transitions. Solana: Uses a hybrid Proof of History (PoH) and Proof of Stake consensus mechanism, where cryptographic timestamps enable high-throughput block production coordinated by a rotating validator set. Across all chains, XYO inherits the consensus security and finality properties of the respective blockchain where it is deployed. The token itself does not introduce a native consensus mechanism but conforms to the infrastructure of the host networks. XYO might be deployed on other blockchains in the future.
H.5	Incentive Mechanisms and Applicable Fees	XYO can be earned by network participants by collecting, relaying, storing and analyzing data for the XYO Network.

H.6	Use of Distributed Ledger Technology	True
H.7	DLT Functionality Description	See part H.2
H.8	Audit	True
H.9	Audit outcome	The audit by CoinMercenary passed without any Issues found.
J.1	Adverse impacts on climate and other environment-related adverse impacts	The XYO token is deployed across multiple public blockchain networks, including Ethereum, Polygon, Arbitrum, Base, and Solana. These blockchains utilize Proof of Stake (PoS) or rollup-based technologies, which are significantly more energy-efficient than traditional Proof of Work (PoW) systems. Ethereum, since its transition to PoS in September 2022 (via the Merge), has reduced its energy consumption by more than 99.9%, with estimated annual emissions near 870 tonnes of CO_2e, down from several million tonnes pre-Merge. Polygon uses a PoS consensus mechanism that is also energy-efficient, and the Polygon team has publicly committed to becoming carbon negative. Arbitrum and Base, as Ethereum Layer 2 optimistic rollups, inherit Ethereum's consensus and contribute minimal additional environmental overhead. Solana uses a hybrid Proof of History (PoH) and PoS model, designed for high throughput with relatively low energy requirements. According to Solana Foundation estimates, the average energy cost per transaction is less than that of a Google search. The XYO token itself does not operate a native blockchain or mining infrastructure and therefore does not directly contribute to energy-intensive consensus processes. Its environmental footprint is indirectly determined by the characteristics of the blockchains it is deployed on.