Xyra Labs Limited MiCAR White Paper

IN ACCORDANCE WITH

TITLE II OF REGULATION (EU) 2023/1114

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01. Date of Notification: 2025-11-07

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 Xyra Labs Limited, 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 Xyra is the utility token for the Xyra Labs trading ecosystem. Holders have the right to receive trading fee discounts, participate in platform governance by proposing and voting on changes, and earn a share of platform fees through staking. These rights are limited to the token's function within the ecosystem and do not represent ownership or any legal claim against the issuer. Purchasers are obligated to use the token for its intended purpose and comply with platform terms and applicable laws. Rights are exercised directly on the Xyra Labs platform: fee discounts are applied automatically, while governance and staking are activated by interacting with designated smart contracts through a connected digital wallet. Any modification to these rights and obligations requires a formal on-chain governance proposal to be approved by a majority vote of participating token holders.

09. Utility Token Summary The Xyra token is the core utility and governance asset of the Xyra Labs ecosystem, a decentralized trading infrastructure. It provides holders with several key functionalities: (i) Fee Reduction: Access to reduced trading and transaction fees on the Xyra Labs platform. (ii) Governance Participation: The right to propose and vote on protocol upgrades and parameter adjustments. (iii) Staking and Rewards: Eligibility to earn a share of protocol-generated fees through staking programs. (iv) Access Rights: Unlocks premium features, beta programs, or early access to new products. While the token is generally freely transferable, certain restrictions apply. Allocations for team members, advisors, and ecosystem programs are subject to time-based vesting schedules that restrict their transferability. Furthermore, transfers may be limited for users in jurisdictions where token use is prohibited by law, or for addresses associated with unlawful activities or sanctioned entities, in line with AML/CFT compliance obligations.

10. Key Information About the Admission to Trading The public offer and admission to trading of the Xyra token are intended to promote transparent participation and decentralized governance within the Xyra Labs ecosystem, rather than for fundraising. Accordingly, there are no subscription goals, issue price, or subscription fees applicable. A total of 300,000,000 Xyra tokens are being admitted to trading. No crypto-asset service provider has been appointed to place the token. Admission to trading is being sought on the Kraken trading platform to facilitate fair and open access for users.

A. Information about the Person Seeking Admission to Trading

A.1 Name: Xyra Labs Limited

A.2 Legal Form: 6EH6

A.3 Registered address: QUIJANO & ASSOCIATES (BVI) LIMITED, Quijano Chambers, P.O. Box 3159, Road Town, Tortola, British Virgin Islands.

A.4 Head office: QUIJANO & ASSOCIATES (BVI) LIMITED, Quijano Chambers, P.O. Box 3159, Road Town, Tortola, British Virgin Islands.

A.5 Registration Date: 2025-09-22

A.6 Legal entity identifier: N/A

A.7 Another identifier required pursuant to applicable national law: 2188085

A.8 Contact telephone number: +82-10-7353-8962

A.9 E-mail address: harvey@xyralabs.io

A.10 Response Time (Days): 001

A.11 Parent Company: N/A

A.12 Members of the Management body:

Name	Business Function	Business Address
Hyunsang Kim	Director	Quijano Chambers, PO BOX 3159, Road Town, Tortola, VG

A.13 Business Activity: Xyra Labs operates as a decentralized trading infrastructure provider focused on on-chain financial markets. Its core business activity is the development and operation of a decentralized exchange (DEX) offering perpetual futures, spot trading, and liquidity aggregation on the Aptos blockchain.

The platform facilitates non-custodial trading through smart contracts, allowing users to execute, settle, and manage positions directly on-chain with full transparency.

In addition, Xyra Labs develops governance frameworks, staking mechanisms, and liquidity programs that support the broader ecosystem built around the Xyra token.

The company’s activities are limited to providing technological infrastructure and associated services and do not include custody of client assets or the provision of traditional financial intermediation.

A.14 Parent Company Business Activity: N/A

A.15 Newly Established: false

A.17 Financial condition since registration:

Xyra Labs was recently incorporated in September 2025, and as such, a comprehensive financial statement has not yet been finalized. Our total assets (liquid assets) currently stand at approximately $1.1 million, while our liabilities are around $22,000. These assets have been accumulated through a combination of equity investments, revenue generation, strategic investments in partner platforms, and B2B collaborations. To date, Xyra Labs has raised $2.1 million and secured grants totaling $500,000. Our primary expenses include staffing, infrastructure, and campaign-related incentives. Xyra Labs remains in strong financial standing, with break-even projected for November and profitability expected to begin in December 2025.

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: Xyra Labs Limited

D.2 Crypto-assets name: Xyra

D.3 Abbreviation: Xyra

D.4 Crypto-asset project description: Xyra is the native utility token of the Xyra Labs ecosystem, a decentralized trading infrastructure designed to provide transparent, on-chain perpetual futures and spot trading. The project aims to combine the performance of centralized exchanges with the security and composability of blockchain-based execution.

The Xyra token serves as the primary coordination and incentive mechanism within this ecosystem. It enables fee discounts, governance participation, and revenue-sharing rewards for active users and stakeholders. All functions are executed through smart contracts deployed on the Aptos blockchain, ensuring transparency, security, and verifiability.

Xyra Labs' long-term goal is to establish a fully decentralized and community-governed trading platform where market participants control core protocol parameters, liquidity programs, and platform development decisions through token-based governance.

The project is developed and maintained by Xyra Labs, which oversees protocol upgrades, security audits, and ecosystem growth in alignment with applicable regulatory requirements.

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

Name	Business Function	Business Address
Hyunsang Kim	Director	Quijano Chambers, PO Box 3159, Road Town, Tortola, BVI

D.6 Utility Token Classification: true

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

The Xyra Labs project is developing a fully on-chain trading infrastructure offering advanced decentralized financial services. Key features include:

- **On-Chain Perpetual Futures Exchange:** A decentralized perpetuals trading platform providing low-latency execution, transparent order matching, and on-chain settlement.

- **Spot and Derivatives Aggregator:** Integration of multiple decentralized liquidity sources to deliver best-price execution across assets and trading pairs.
- **Governance Framework:** On-chain governance tools that allow Xyra token holders to propose and vote on protocol upgrades, fee parameters, and incentive programs.
- **Revenue Distribution Mechanism:** Smart contract–based reward programs distributing a share of platform fees to active token holders and stakers.
- **Developer and Partner Integration Layer:** APIs and SDKs enabling third-party protocols and trading bots to integrate directly with Xyra's decentralized infrastructure.

All services are designed to be transparent, non-custodial, and accessible globally through smart contracts deployed on the Aptos blockchain.

D.8 Plans for the token:

The Xyra token is designed to serve as the foundational utility and governance asset of the Xyra Labs ecosystem. Its long-term plan focuses on promoting decentralized participation, aligning incentives, and supporting the sustainable growth of the platform.

Planned developments include:

- **Ecosystem Utility Expansion:** Extending token use cases across new products such as margin trading, staking derivatives, and cross-chain trading modules.
- **Progressive Decentralization:** Gradual transfer of key protocol decisions to token-based governance, enabling community-led oversight and development.
- **Incentive Alignment:** Continued implementation of staking and liquidity programs that reward active contributors and long-term participants.
- **Interoperability:** Future cross-chain deployment of Xyra to enhance liquidity access and user reach across multiple blockchain ecosystems.

All plans will be executed transparently, with governance proposals and implementation steps recorded on-chain and disclosed to the community.

D.9 Resource Allocation:

Xyra Labs has committed both financial and human resources to the ongoing development and operation of the Xyra ecosystem.

Allocated resources include:

- **Development Team:** A dedicated group of blockchain engineers, smart contract developers, and security specialists responsible for protocol design, testing, and maintenance.

- **Operational and Compliance Staff:** Personnel overseeing project management, regulatory alignment, and ongoing risk monitoring.
- **Financial Resources:** A portion of the total Xyra token supply and company treasury funds earmarked for development, audits, and ecosystem growth initiatives.
- **Technical Infrastructure:** Secure hosting environments, validator partnerships, and monitoring tools supporting on-chain operations and platform reliability.
- **External Partnerships:** Collaborations with auditing firms, liquidity partners, and service providers to ensure technical robustness and transparency.

These resources are allocated to ensure sustainable project development, platform security, and adherence to MiCA compliance standards.

D.10 Planned Use of Collected Funds or Crypto-Assets: Funds and crypto-assets collected during the Xyra token offering will be used exclusively to support the continued development, operation, and expansion of the Xyra Labs ecosystem.

Planned allocations include:

- **Product Development (40%)** – Ongoing engineering, smart contract upgrades, security audits, and deployment of new trading features.
- **Liquidity and Market Support (25%)** – Providing initial and ongoing liquidity for Xyra trading pairs to ensure efficient market functioning.
- **Operations and Compliance (10%)** – Covering infrastructure, legal, and regulatory compliance expenses.
- **Marketing and Community Growth (15%)** – Funding ecosystem awareness, educational content, and incentive programs for users and partners.
- **Reserves and Contingency (10%)** – Maintaining operational stability and addressing unforeseen technical or market conditions.

All fund movements will be conducted transparently through on-chain transactions, with periodic disclosures of treasury activity.

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 public offer and admission to trading of the Xyra token are intended to promote transparent participation and decentralized governance within the Xyra Labs ecosystem. Key objectives include:

- **Ecosystem Participation:** Enabling users, traders, and contributors to access platform utilities such as fee discounts, governance voting, and staking-based rewards.
- **Liquidity and Accessibility:** Facilitating fair and open access to the token through regulated on-chain markets, ensuring users can acquire or transfer tokens freely.
- **Community Governance:** Distributing tokens broadly to align the interests of participants with the long-term development and decentralization of the protocol.

The offer and trading admission are therefore designed to support ecosystem growth rather than speculative investment or capital raising.

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: 300000000

E.13 Targeted Holders: ALL

E.14 Holder restrictions: There are no general restrictions on holding Xyra tokens. Any individual or entity with a compatible digital wallet may hold and use the tokens within the Xyra Labs ecosystem.

However, the following limitations apply:

- **Jurisdictional Compliance:** Persons or entities located in jurisdictions where the offering or holding of crypto-assets is restricted by law may not participate.

- **Sanctions and AML Requirements:** Xyra Labs prohibits token holding or participation by individuals or entities listed on international sanctions registers or those failing AML/CFT checks.
- **Vesting Restrictions:** Certain allocations (such as team or advisory tokens) are subject to vesting and may not be transferred or accessed until the applicable lockup period expires.

Beyond these compliance-based restrictions, Xyra tokens are freely holdable and transferable.

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:

Payments may be made in supported cryptocurrencies (e.g., USDT, USDC, ETH) and, where applicable, via fiat currency through approved payment channels. Details on supported payment methods and networks for purchasing Xyra will be publicly disclosed prior to the sale to ensure full transparency for participants.

E.25 Value Transfer Methods for Reimbursement: In the event that a reimbursement is required, such as in the case of a verified technical error or cancellation of the offering, Xyra Labs will process all reimbursements on-chain using the same method and asset originally used for payment.

Reimbursements will be executed as follows:

- Funds will be returned to the same wallet address from which the original transaction was received.
- Transfers will occur in the same cryptocurrency or token used for the initial purchase (e.g., USDC, USDT, or APT).
- All reimbursement transactions will be publicly verifiable on the blockchain to ensure transparency and traceability.

- No off-chain or fiat reimbursements will be made.

E.26 Right of Withdrawal: N/A

E.27 Transfer of Purchased Crypto-Assets: Purchased Xyra tokens are delivered directly and automatically on-chain to the purchaser's verified wallet address after successful payment confirmation.

The transfer process operates as follows:

- Upon receipt of the participant's payment in a supported cryptocurrency, the smart contract validates the transaction and triggers the automated distribution of the corresponding Xyra tokens.
- Tokens are transferred to the same wallet address used for the purchase, ensuring secure and verifiable delivery without intermediaries.
- All transfers are recorded on the blockchain, providing full transparency and traceability of token allocation.
- No manual intervention or off-chain delivery process is involved. Token ownership is established once the transaction is finalized on-chain.

No manual intervention or off-chain delivery process is involved. Token ownership is established once the transaction is finalized on-chain.

E.28 Transfer Time Schedule: N/A

E.29 Purchaser's Technical Requirements: To participate in the Xyra token offering and use the token within the Xyra Labs ecosystem, purchasers must meet certain basic technical requirements.

Participants must have:

- A compatible digital wallet that supports the blockchain network on which Xyra is issued.
- Secure internet access to interact with the Xyra Labs platform or token sale interface.
- Sufficient network tokens (e.g., gas fees) to complete on-chain transactions.
- Basic operational knowledge of decentralized wallets and blockchain transactions to ensure correct participation.

Xyra Labs will provide clear documentation and step-by-step guidance before the offering to help participants meet these technical requirements and prevent transaction errors.

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:
Users can access Xyra token trading through officially supported exchange platforms, following each platform's standard onboarding and compliance requirements.

Access is available through:

- Visiting the official exchange website or mobile application and completing any required registration and KYC verification procedures.
- Funding accounts with supported cryptocurrencies (e.g., USDT, USDC, ETH) or fiat currency via approved payment channels.
- Searching for the XYRA trading pair once it is officially listed and admitted to trading.

All transactions are executed within regulated trading environments that ensure transparent order books, secure custody, and adherence to applicable financial and compliance standards.

E.36 Involved costs: Standard trading fees apply as determined by the listing platform. Xyra Labs does not impose any additional access, service, or transaction fees beyond those charged by the exchange.

E.37 Offer Expenses: N/A

E.38 Conflicts of Interest: No

E.39 Applicable law: Laws of the British Virgin Islands, and applicable international AML/KYC and securities regulations in relevant jurisdictions.

E.40 Competent court: The competent court will be 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: We are offering an ERC-20 token on the BSC chain and also an Aptos token on the Aptos chain. The Xyra token is a utility token as defined under Article 3(1)(9) of Regulation (EU) 2023/1114 (MiCA). It is designed to provide holders with access to specific functionalities within the Xyra Labs ecosystem, including trading fee reductions, governance participation, and eligibility for staking-based rewards. The token does not represent ownership, profit participation, or redemption rights, and it is not backed by any underlying asset or fiat currency. Accordingly, Xyra does not qualify as an asset-referenced token (ART) or an e-money token (EMT) under MiCA.

F.2 Crypto-Asset Functionality:

The Xyra token serves as the core utility and governance asset of the Xyra Labs ecosystem. Its primary functionalities include:

- **Fee Reduction:** Holders receive reduced trading and transaction fees when using the Xyra Labs decentralized exchange and related services.
- **Governance Participation:** Tokens grant holders the right to propose and vote on protocol upgrades, parameter adjustments, and ecosystem initiatives through on-chain governance mechanisms.
- **Staking and Rewards:** Participants who stake or delegate Xyra tokens may earn a share of protocol-generated fees or incentive distributions.
- **Access Rights:** Holding or staking specific amounts of Xyra may unlock premium features, beta programs, or early access to new products.

All functionalities are executed through smart contracts on the Aptos blockchain, ensuring transparency, automation, and verifiable execution.

F.3 Planned Application of Functionalities:

All core functionalities of the Xyra token will be available immediately upon launch of the public offering and network deployment.

Specifically:

- Fee discounts and on-chain governance participation will become active as soon as the token is distributed and integrated into the Xyra Labs decentralized exchange.
- Staking and reward programs will be introduced during the initial launch phase and progressively expanded as the ecosystem grows.
- Access-based features (such as premium trading tools or early product releases) will be rolled out in subsequent platform updates following the initial launch.

Each functionality will be enabled through smart contracts, with activation timelines and updates publicly disclosed by Xyra Labs.

F.4 Type of white paper: OTHR

F.5 The type of submission: NEWT

F.6 Crypto-Asset Characteristics:

The Xyra token is a fungible, utility-based digital asset issued on the Aptos blockchain. It conforms to the Aptos Token Standard (APT-20) and is fully transferable between compatible wallets and smart contracts.

Key characteristics include:

- **Token Type:** Utility token
- **Blockchain Network:** Aptos and BSC
- **Total Supply:** Fixed and pre-defined at issuance; no additional minting permitted beyond the initial supply.
- **Divisibility:** Tokens are divisible to support fractional transactions.
- **Transferability:** Freely transferable on-chain, except for allocations subject to vesting or compliance restrictions.
- **Governance Function:** Enables on-chain voting and proposal submission for protocol-level decisions.
- **Utility Function:** Provides access to fee discounts, staking, and participation in reward programs within the Xyra Labs ecosystem.

The token's structure ensures transparency, interoperability, and security through immutable on-chain smart contracts.

F.7 Commercial name or trading name: Xyra

F.8 Website of the issuer: www.xyralabs.io

F.9 Starting date of offer to the public or admission to trading: 2025-12-05

F.10 Publication date: 2025-12-05

F.11 Any other services provided by the issuer:

None

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: true

F.16 Personal data flag: false

F.17 LEI eligibility: false

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:
Purchaser Rights
Xyra token holders receive specific functional rights within the Xyra Labs ecosystem:

- Fee Discounts: Reduced trading and transaction fees on the Xyra Labs platform, determined by token holdings or staking levels.
- Governance: The right to propose and vote on protocol or parameter changes through on-chain governance mechanisms.
- Revenue Share: Eligibility to receive a portion of platform fees distributed to active participants in staking or governance programs.

These rights are limited to the Xyra Labs ecosystem and do not represent any claim, debt, or ownership interest in Xyra Labs or its affiliates.

Purchaser Obligations
Purchasers must:

- Use Xyra solely within its defined ecosystem functions.
- Comply with all applicable laws, including AML/CFT obligations.
- Acknowledge blockchain-related risks such as smart contract or network failures.
- Follow the platform's Terms of Use and governance rules.

No additional obligations are imposed beyond participation within the ecosystem.

G.2 Exercise of Rights and obligations:
Holders of Xyra tokens may exercise their rights directly through the Xyra Labs platform and its on-chain smart contract interfaces.

- Fee Discounts: Discounts apply automatically when eligible token balances are detected in a connected wallet during a transaction. No manual action is required from the user.
- Governance Participation: Token holders may connect their wallet to the governance portal to submit or vote on proposals. Voting weight is determined by the number of Xyra tokens held or staked at the snapshot time defined for each vote.
- Revenue Share: Participation in revenue-sharing programs requires staking or delegation of Xyra tokens in designated smart contracts. Rewards are distributed automatically based on program parameters and the duration of participation.

All procedures are transparent and verifiable on-chain.

Conditions for exercising rights are set out in the official Xyra Labs documentation and may be updated through governance decisions or protocol upgrades approved by token holders.

G.3 Conditions for modifications of rights and obligations:
The rights and obligations associated with the Xyra token may only be modified through transparent and verifiable governance procedures conducted on-chain.

Any proposed change must be:

- Initiated through a governance proposal submitted by eligible token holders or by Xyra Labs in accordance with the governance framework.
- Approved by a majority vote of participating token holders within the parameters defined in the protocol's governance documentation.
- Implemented via smart contract upgrades or protocol adjustments, executed only after approval to ensure traceability and community consent.

Changes that affect user access, fee structures, or reward mechanisms are subject to public notice and recorded on-chain before taking effect.

Xyra Labs does not have unilateral authority to alter tokenholder rights outside the approved governance process.

G.4 Future Public Offers:
At present, Xyra Labs does not have any confirmed plans for additional public offerings of the Xyra token beyond the initial launch. Any future public offer would be conducted in full compliance with applicable regulatory requirements under the Markets in Crypto-Assets Regulation (MiCA) and relevant national laws.
Should a future offer be proposed, Xyra Labs would:

- Publish an updated and MiCA-compliant whitepaper reflecting the terms of the new offering.
- Notify and, where required, seek authorization from the competent authority prior to launch.
- Ensure transparent disclosure of offer conditions, allocation methods, and associated risks to potential purchasers.

All subsequent token distributions, if any, will be executed using verifiable on-chain mechanisms and will maintain equal and fair access for participants, consistent with MiCA principles of transparency and investor protection.

G.5 Issuer Retained Crypto-Assets: 120000000

G.6 Utility Token Classification: true

G.7 Key Features of Goods/Services of Utility Tokens: The Xyra token serves as a functional unit within the Xyra Labs ecosystem, granting holders access to specific

platform utilities and enhanced trading features.
Key accessible services include:

- Trading Fee Reductions: Xyra tokens can be used to obtain reduced fees on transactions executed through the Xyra Labs decentralized exchange and its associated trading products.
- Governance Participation: Token holders can use Xyra to participate in on-chain governance, including proposing and voting on protocol updates, parameter adjustments, and ecosystem initiatives.
- Revenue Distribution Programs: Holders who stake or delegate Xyra tokens in approved contracts may receive a share of platform-generated fees, subject to program conditions.
- Access to Advanced Platform Features: Certain products or beta functionalities within the Xyra Labs suite may require holding or staking a minimum quantity of Xyra tokens to access.

All features are delivered through smart contracts and can be accessed using a supported digital wallet connected to the Xyra Labs platform.

G.8 Utility Tokens Redemption:
Xyra tokens are redeemed for goods and services directly within the Xyra Labs ecosystem through on-chain interactions. Redemption occurs automatically when the token is used to access a specific feature or benefit. Examples include:

- Trading Fee Reductions: The system automatically applies discounts when a connected wallet holding Xyra tokens executes a trade.
- Governance and Staking Functions: Tokens are committed to smart contracts to enable voting or staking, thereby granting access to corresponding utilities or rewards.
- Access Features: Holding or staking required amounts of Xyra enables access to premium or early-release platform services.

No manual redemption process or conversion to fiat currency is involved. All redemptions occur transparently and programmatically via smart contracts on the blockchain.

G.9 Non-Trading request: true

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

G.11 Crypto-Assets Transfer Restrictions:

Xyra tokens are freely transferable on supported blockchain networks, subject to applicable laws and compliance requirements.

There are no general restrictions on peer-to-peer transfers or trading between users. However, certain limitations apply in specific cases:

- **Regulatory Compliance:** Transfers may be restricted for users located in jurisdictions where token distribution or use is not permitted under local law.
- **Vesting and Lockup Periods:** Allocations reserved for team members, advisors, or ecosystem programs are subject to time-based vesting and cannot be transferred until released according to the vesting schedule.
- **Security and Sanctions Measures:** Xyra Labs reserves the right to restrict or suspend transfers involving addresses associated with unlawful activities or sanctioned entities, in line with AML/CFT obligations.

All other transfers occur freely through the blockchain's standard transaction mechanisms.

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 issuance and operation of the Xyra token are governed by the laws and regulations applicable to crypto-assets within the European Union and the jurisdiction of incorporation of Xyra Labs.

Key applicable frameworks include:

- Regulation (EU) 2023/1114 on Markets in Crypto-Assets (MiCA): Establishes the regulatory requirements for the issuance, offering, and admission to trading of crypto-assets within the EU.
- Regulation (EU) 2015/847 (Transfer of Funds Regulation – TFR): Governs information requirements for transfers of funds and crypto-assets to ensure traceability for AML/CFT compliance.
- Directive (EU) 2015/849 (AMLD5) and subsequent amendments: Establishes anti-money laundering and counter-terrorist financing obligations for crypto-asset service providers.
- General Data Protection Regulation (EU) 2016/679 (GDPR): Applies to the processing of any personal data in connection with the operation of the Xyra Labs platform.

- National Company and Tax Laws: Applicable within the jurisdiction where Xyra Labs is incorporated and operates.

Where Xyra tokens are made available outside the EU, the issuer will comply with any relevant local financial, tax, and consumer protection regulations.

G.19 Competent court: The competent court is the High Court of the British Virgin Islands

H. Information on the Underlying Technology

H.1 Distributed ledger technology:

The Xyra token will be issued on two blockchain networks: the Aptos blockchain and the BNB Smart Chain (BSC). Both networks operate as independent distributed ledger systems that support transparent, secure, and verifiable token management.

- **Aptos Network:**
  A high-performance Layer-1 blockchain using the Move programming language and a Byzantine Fault Tolerant (BFT) consensus protocol. Aptos provides low-latency finality, parallel transaction execution, and secure smart contract functionality for on-chain governance and trading utilities.

- **BNB Smart Chain (BSC):**
  An EVM-compatible Layer-1 blockchain utilizing the Proof of Staked Authority (PoSA) consensus mechanism. BSC enables broad interoperability, low transaction costs, and integration with major decentralized exchanges and DeFi applications.

Cross-chain interoperability between Aptos and BSC will be achieved through bridging mechanisms that allow seamless transfer and unified supply management across both networks.
All token contracts on each chain are verifiable, open-source, and deployed under consistent parameters to ensure transparency and traceability.

H.2 Protocols and technical standards:

The Xyra token is implemented using established blockchain protocols and token standards to ensure security, interoperability, and compatibility across supported networks.

- **On Aptos:**
  The token follows the APT-20 (Aptos Token Standard), developed using the Move programming language. This standard defines token structure, transfer logic, and on-chain governance modules while ensuring verifiable execution and safety through resource-based programming.

- **On BNB Smart Chain (BSC):**
  The token conforms to the BEP-20 standard, which ensures full compatibility with the Binance Smart Chain ecosystem, including decentralized exchanges, wallets, and DeFi protocols.

Both deployments utilize audited smart contracts, secure cryptographic primitives, and standardized interfaces for wallet and exchange integration.
Interoperability between the two networks will be managed through cross-chain bridge protocols enabling token transfer and supply synchronization.

H.3 Technology Used:

The holding, storage, and transfer of Xyra tokens rely on decentralized, on-chain technologies across both the Aptos and BNB Smart Chain (BSC) networks, supported by multi-signature security controls.

Key technologies include:

- **Non-Custodial Wallets:** Users hold Xyra tokens in self-custodied wallets such as Petra and Martian (Aptos) and MetaMask or Trust Wallet (BSC). Private keys remain under the user's sole control.
- **Multi-Signature Wallets:** All issuer-controlled and treasury wallets used by Xyra Labs are multi-signature, requiring approval from multiple authorized signatories before executing any transaction. This ensures enhanced operational security and prevents unilateral access.
- **Smart Contracts:** Transfers, staking, and governance actions occur via audited smart contracts deployed on both networks, guaranteeing transparency and automation.
- **Cross-Chain Bridge Protocols:** Secure interoperability mechanisms synchronize token supply and enable transfers between Aptos and BSC.
- **Blockchain Infrastructure:** Transactions are validated through decentralized consensus mechanisms (BFT on Aptos, PoSA on BSC), ensuring immutability and reliability.

All asset movements involving issuer-controlled wallets are logged on-chain and subject to internal review and multi-signature verification.

H.4 Consensus Mechanism:

The Xyra token operates on two blockchain networks, Aptos and BNB Smart Chain (BSC), each utilizing distinct consensus mechanisms to secure and validate transactions.

- **Aptos:**
  Uses a Byzantine Fault Tolerant (BFT) consensus mechanism, specifically the AptosBFT v2 protocol. This model provides high throughput, rapid finality, and resilience against malicious or offline validators. It enables parallel transaction execution, ensuring efficiency and network reliability.
- **BNB Smart Chain (BSC):**
  Employs the Proof of Staked Authority (PoSA) consensus model, which combines elements of Delegated Proof of Stake (DPoS) and Proof of Authority (PoA). Validators stake BNB and are selected to produce and validate blocks, providing fast block times and low transaction costs while maintaining decentralization and security.

Both mechanisms ensure transparent, verifiable transaction validation and robust network performance for Xyra token operations.

H.5 Incentive Mechanisms and Applicable Fees:

We have held multiple contests and campaigns and the winners and participants of all those campaigns have been shortlisted for airdropping of tokens. They will not be charged for any fees.

The Xyra token incorporates on-chain incentives and transparent fee structures designed to reward participation and maintain sustainable platform operations.

Incentive Mechanisms:

- **Staking Rewards:** Token holders who stake or delegate Xyra tokens through approved smart contracts receive a share of platform-generated trading fees or reward allocations.
- **Governance Participation:** Active contributors in governance proposals or protocol votes may earn recognition or additional staking incentives.
- **Liquidity Programs:** Liquidity providers on the Xyra decentralized exchange may receive Xyra token incentives based on trading volume and liquidity contribution.

Applicable Fees:

- **Network (Gas) Fees:** Standard blockchain transaction fees apply on the Aptos and BNB Smart Chain networks, paid directly to network validators, not to Xyra Labs.
- **Staking or Withdrawal Fees:** Minimal on-chain transaction costs may apply when entering or exiting staking programs, determined by network gas usage.

All incentive distributions and fee policies are defined transparently in smart contracts and subject to governance oversight by token holders.

H.6 Use of Distributed Ledger Technology: false

H.7 DLT Functionality Description: N/A

H.8 Audit: true

H.9 Audit outcome:

Smart contracts and security architecture have been audited by independent third-party security firms. The audit concluded that no critical vulnerabilities were found, and all identified issues were remediated.

Link: https://movebit.xyz/reports/20250221-Xyra-Smart-Contract-Final-Audit-Report.pdf

I. Information on Risks

I.1 Offer-Related Risks: Participation in the Xyra token offering or subsequent trading involves certain technological, market, and regulatory risks. These risks are inherent to blockchain-based systems and are disclosed to ensure informed decision-making by participants.

Key risk categories include:

Market Risk: The value of Xyra tokens may fluctuate significantly based on market demand, liquidity, and overall volatility of the crypto-asset sector. There is no guarantee of stable or appreciating value.

Technology and Security Risk: Smart contract vulnerabilities, network outages, or validator failures on Aptos or BNB Smart Chain could temporarily disrupt transactions or affect token functionality.

Operational Risk: Errors during token distribution, cross-chain bridging, or governance execution could result in delays or unintended outcomes, despite preventive audits.

Regulatory Risk: Changes in applicable laws, licensing requirements, or regulatory interpretations of crypto-assets may impact the availability or operation of the Xyra ecosystem.

User Risk: Loss of private keys, phishing attacks, or mismanagement of wallet credentials may lead to permanent loss of tokens, as transactions on the blockchain are irreversible.

Xyra Labs applies strong technical and organizational safeguards to minimize these risks but cannot eliminate them entirely due to the decentralized nature of the underlying technologies.

I.2 Issuer-Related Risks: N/A

I.3 Crypto-Assets-related Risks: The Xyra token, like other blockchain-based digital assets, carries specific risks that may affect its value, usability, or accessibility. These risks are inherent to decentralized systems and should be carefully considered by all purchasers and holders.

Key risk factors include:

Price Volatility: The market price of Xyra tokens may fluctuate widely due to speculative trading, liquidity conditions, or broader crypto-market movements.

Technology and Smart Contract Risk: Bugs, coding errors, or vulnerabilities in the smart contracts governing the Xyra token could result in unintended behavior or loss of funds.

Network Risk: Operational disruptions, validator issues, or consensus failures on the Aptos or BNB Smart Chain networks may temporarily affect transfers or functionality.

Cybersecurity Risk: Attacks on wallets, bridges, or decentralized applications connected to Xyra could lead to loss or theft of tokens.

Governance and Protocol Risk: On-chain governance decisions made by token holders could alter the token's utility, parameters, or reward structure.

Regulatory and Legal Risk: Future regulatory developments or enforcement actions may restrict trading, holding, or use of the token in certain jurisdictions.

User Custody Risk: Mismanagement of private keys or loss of wallet access can result in permanent loss of tokens, as blockchain transactions are irreversible.

Xyra Labs continually monitors and mitigates these risks through smart contract audits, network security reviews, and transparent governance practices.

I.4 Project Implementation-Related Risks: The successful implementation of the Xyra Labs project depends on several technical, operational, and external factors. While Xyra Labs has established clear development and governance frameworks, certain risks remain inherent to the execution of decentralized projects.

Key risks include:

Technical Development Risk: Delays, bugs, or unforeseen technical challenges in smart contract deployment, cross-chain integration, or platform scalability may affect planned timelines.

Operational and Resource Risk: The project relies on skilled personnel, partners, and external service providers. Any loss of key team members or strategic partners could slow progress or impact operations.

Security Risk: Despite audits and continuous monitoring, vulnerabilities in code, bridges, or validator networks may be exploited, affecting platform integrity.

Adoption and Market Risk: Slower-than-expected user or liquidity growth may affect ecosystem sustainability and the intended token utility.

Regulatory and Compliance Risk: Changes in regulatory interpretation or new compliance requirements under MiCA or national frameworks could necessitate adjustments to project operations or timelines.

Third-Party Dependency: Integration with external protocols or infrastructure providers carries a risk of service disruption or dependency-related delays.

Xyra Labs actively mitigates these risks through phased development, independent security audits, redundancy planning, and ongoing compliance oversight.

I.5 Technology-Related Risks: The Xyra Labs ecosystem operates on decentralized blockchain infrastructure across Aptos and BNB Smart Chain (BSC). While these technologies provide transparency and security, they also introduce specific risks inherent to distributed ledger systems.

Key risks include:

Smart Contract Vulnerabilities: Undetected bugs, coding errors, or exploits in deployed contracts could result in loss of funds, malfunctioning features, or security breaches, despite prior auditing.

Network Reliability Risk: Disruptions, validator failures, or consensus breakdowns on Aptos or BSC could temporarily halt transactions or delay token transfers.

Cross-Chain Bridge Risk: As Xyra operates across two networks, bridge contracts may face risks of exploitation or synchronization errors between chains.

Scalability and Performance Risk: High network congestion or unexpected transaction volume could impact platform performance or increase gas fees.

Cybersecurity Risk: Attacks on connected infrastructure, such as RPC endpoints, multi-signature wallets, or front-end interfaces, could disrupt access or compromise assets.

Dependency on External Infrastructure: The project relies on third-party tools (e.g., wallets, node providers, oracles) that may experience outages or technical failures beyond Xyra Labs' control.

Xyra Labs mitigates these risks through multiple security audits, redundant infrastructure, continuous monitoring, and implementation of industry-standard best practices in smart contract and bridge design.

I.6 Mitigation measures: Xyra Labs has implemented a comprehensive set of technical and organizational controls to mitigate risks associated with the underlying blockchain and smart contract technologies.

Key mitigation measures include:

Independent Security Audits: All smart contracts, bridge mechanisms, and key platform components undergo external code audits by reputable blockchain security firms prior to deployment.

Multi-Signature Wallet Controls: Treasury and operational wallets require multi-signature authorization to prevent single-point compromise and ensure secure fund management.

Continuous Monitoring: Automated tools and manual review processes monitor network activity, bridge operations, and contract performance to detect anomalies or suspicious activity in real time.

Redundant Infrastructure: Multiple validator, RPC, and node configurations are maintained to ensure operational continuity in the event of infrastructure or network failure.

Gradual Deployment: New features and upgrades are rolled out through phased releases and testnet validation before mainnet implementation.

Incident Response and Recovery Procedures: Established protocols exist for rapid containment, remediation, and public communication in case of a security or technical incident.

Regular Updates and Governance Oversight: The protocol's governance framework allows timely updates to address emerging vulnerabilities or improve system resilience.

Together, these measures reduce the likelihood and potential impact of technology-related failures while maintaining transparency and operational security.

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

S.1 Name: Xyra Labs Limited

S.2 Relevant legal entity identifier: N/A

S.3 Name of the crypto-asset: Xyra

S.4 Consensus Mechanism:

The Xyra token operates on two blockchain networks, Aptos and BNB Smart Chain (BSC), each utilizing distinct consensus mechanisms to secure and validate transactions.

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- **Staking or Withdrawal Fees:** Minimal on-chain transaction costs may apply when entering or exiting staking programs, determined by network gas usage.

All incentive distributions and fee policies are defined transparently in smart contracts and subject to governance oversight by token holders.

S.6 Beginning of the period to which the disclosure relates: 2025-11-24

S.7 End of the period to which the disclosure relates: 2027-03-25

S.8 Energy consumption: 0.369 kWh

S.9 Energy consumption sources and methodologies:

The energy consumption estimates reported in this Section are based on publicly available data from independent research institutions. The methodology involves calculating the average energy consumed per transaction on Binance Smart Chain and extrapolating that figure across an approximate volume of 46,000 transactions for the purpose of MiCA-related disclosures. The total estimated energy usage on Binance Smart Chain is approximately 0.368 kWh.