

ANyONe Protocol (ANYONE)

White paper

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

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01	Date of notification	2025-12-02

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 ANYONE token 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	<p>Warning</p> <p>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.</p>
08	Characteristics of the crypto-asset	<ul style="list-style-type: none"> - The ANYONE token is a fungible token issued on the Ethereum blockchain based on the ERC20 standard - The token is used within the context of the Anyone Network (“Network”). The Network is a decentralized onion routing network made up of nodes known as relays, which are incentivized by the protocol. - The token serves multiple use-cases within the operation of the Network. Relay operators and potential future network participants such as bandwidth authorities and service providers must lock Anyone to become integrated into the network. The token is used to drive network participants towards useful actions in the network through being distributed as an incentive, and through its potential use as a payment token for premium and high-throughput user demand. As the network decentralizes, Anyone forms a more direct part of network management, staked by bandwidth authorities and holders to come to consensus on relay incentives, relay management and broader project governance - The functionalities of the ANYONE token are purely technical, the token does not confer any rights nor impose obligations on its holders. - The token is a crypto asset as defined by article 3 (1) (5) of Regulation (EU) 2023/1114 and more specifically, it qualifies as a utility token under article 3 (1) (9) of the aforementioned regulation.

09	Information about the quality and quantity of goods or services to which the utility tokens give access and restrictions on the transferability	<p>The token allows to run a node within the Anyone Network. Users must lock certain quantity of ANYONE tokens to be able to register and run their node (currently ANYONE tokens equivalent to at least 100 USD must be locked by a user).</p> <p>Additionally, the token will give access to the 'premium bandwidth', which means a user would purchase the right to use otherwise gated nodes in the network to route user traffic. These nodes may have desirable speeds or be in desirable geographies. The scale and quantity of such paid services provided by the Network depends on the availability of nodes and overall state of the Network. Preliminary estimated that a monthly subscription for a single user in the network to use premium services will be around 10-20 USD equivalent in ANYONE tokens a month.</p> <p>There are no restrictions on the transferability of ANYONE token.</p>
10	Key information about the offer to the public or admission to trading	<p>The Foundation for Anyone seeks admission to trading of the ANYONE token on multiple trading platforms, including Kraken, to be compliant with MiCA and to make available ANYONE for trading in the EU.</p>
I.1	Offer-Related Risks	<p>Technical Complexity Risks: There exists risk of technical issues with the migration contract or migration application. Additionally, some participants wallets may not be compatible with these interfaces. Additionally, there are third-party risks with the Ethereum blockchain and wallets used to transact the ANYONE token.</p>
I.2	Issuer-Related Risks	<p>Key Individuals Risk The success of the Anyone Protocol depends on contributions from its core contributors and leadership. Departure or incapacity of key individuals could disrupt progress.</p> <p>Operational Risk Weaknesses in governance, treasury management, or internal processes by the Foundation could cause financial loss or reputational harm.</p> <p>Reputational Risk Negative publicity, including regulatory scrutiny, operational failures, or perceived association with illicit use of privacy technologies, could undermine the Foundation's credibility and token adoption.</p> <p>Abandonment / Lack of Success Risk There is a risk that the activities of the Anyone Protocol ecosystem may be partially or wholly abandoned. This could occur for reasons including, but not limited to, lack of sufficient adoption by users, insufficient staking participation by node operators, lack</p>

		<p>of developer contributions, force majeure events (including pandemics, wars, or cybersecurity incidents), or the inability to achieve commercial viability.</p> <p>Fraud and Mismanagement Risk Fraud, mismanagement, or misconduct by contributors, operators, or other ecosystem participants could directly affect the functioning of the Anyone Protocol or damage trust in the ecosystem, thereby impacting the value and utility of the ANYONE Token.</p>
I.3	Crypto-Assets-related Risks	<p>Market Risk The value of the ANYONE Token may fluctuate significantly based on supply and demand dynamics, broader crypto market conditions, or changes in sentiment toward privacy technologies.</p> <p>Liquidity Risk The ANYONE Token may not always be tradable, transferable, or liquid on secondary markets. Listings may occur without authorization from the Foundation.</p> <p>Unsolicited Admission to Trading Risk The ANYONE Token may be listed by third-party platforms without the Foundation’s involvement. Such listings do not imply endorsement or stability of those platforms.</p> <p>Regulatory and Legal Compliance Risk Privacy-focused networks and crypto-assets face evolving regulatory environments across jurisdictions. Future laws may restrict trading, usage, or increase compliance costs.</p>
I.4	Project Implementation-Related Risks	<p>Project Change Risk The Protocol’s design may evolve (e.g. staking models, routing incentives, governance). Such changes could alter the value proposition compared to initial expectations.</p> <p>Withdrawing Partners Risk The Protocol relies on independent node operators, developers, and partners. Withdrawal of major participants could slow adoption or disrupt operations.</p> <p>Industry Competition Risk Other privacy or bandwidth-sharing projects may outcompete the Anyone Protocol due to larger resources or market presence.</p>
I.5	Technology-Related Risks	<p>Network Control Risk The Foundation does not operate or control the network. Node operators are independent third parties, and outcomes of interactions are not managed by the Foundation.</p> <p>Novel Ecosystem Risk</p>

		<p>The ANYONE ecosystem, centred around the Anyone Protocol, is built on emerging and rapidly evolving technologies. These include blockchain-based smart contracts, the use of Arweave for permanent data storage and metadata anchoring, and advanced distributed systems management for circuit creation, staking families, and relay coordination. As with any novel technology stack, there is no guarantee that the processes of receiving, using, staking, or holding ANYONE Tokens will be uninterrupted or error-free.</p> <p>Smart Contract and Security Risk Bugs, vulnerabilities, or attacks against smart contracts or the routing protocol could disrupt the network or cause token loss.</p> <p>Fraud and Mismanagement Risk Malicious actors or ecosystem participants could engage in fraud or mismanagement, undermining trust.</p> <p>Unanticipated Risks New risks may emerge that are unforeseen today, particularly given evolving regulation and rapid technological development.</p>
I.6	Mitigation measures	<p>Decentralization of Development: Open-source development and contributions from multiple parties reduce reliance on any single individual or entity.</p> <p>Governance and Controls: The Foundation has implemented governance procedures and aims to progressively decentralize decision-making, minimizing operational concentration.</p> <p>Transparency and Community Engagement: Transparent communication of project changes and clear guidance on official token access reduce misinformation risks. Foundation maintains the audits results, important governance decisions and other information according to the law.</p> <p>Incentive Alignment: Staking models, bandwidth mining rewards, and family structures encourage honest participation and ongoing network support.</p> <p>Regulatory Monitoring and Compliance: The Foundation tracks regulatory developments across relevant jurisdictions, including MiCA, AMLD6, GDPR and other applicable regulations. The Foundation adapts internal policies accordingly and cooperates with competent authorities where required.</p> <p>Security Practices: Smart contracts undergo security reviews and audits, and open-source transparency enables ongoing community auditability. The Foundation maintains continuous monitoring, penetration testing, and a bug bounty program. Treasury assets are safeguarded with multi-signature wallets and role-based access controls.</p>

		<p>Ecosystem Resilience: Decentralized reliance on multiple node operators and contributors mitigates risks from partner withdrawals or central points of failure.</p> <p>Adaptive Framework: The Protocol is designed to evolve, allowing iterative improvements to address unforeseen risks. Upgrade procedures include mandatory review and audit cycles before the deployment of significant changes to smart contracts or governance models.</p> <p>Fraud prevention: Internal controls such as segregation of duties, multi-person approvals, and periodic audits mitigate risks of fraud or mismanagement by Foundation staff or contractors.</p> <p>Illicit activity prevention: Transaction monitoring and chain-analysis tools are employed to detect suspicious activity. The Foundation maintains procedures for lawful cooperation with authorities while preserving user privacy within applicable legal frameworks.</p> <p>Operational continuity: Business continuity and disaster recovery plans are in place, with defined recovery time and recovery point objectives. Regular testing ensures resilience against disruptions.</p>
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Part A - Information about the offeror or the person seeking admission to trading

A.1	Name	The Foundation for Anyone
A.2	Legal form	Foundation
A.3	Registered address	3119 9 Forum Lane, Camana Bay P.O. Box 144, Grand Cayman KY1-9006 Cayman Islands
A.4	Head office	Same as registered address
A.5	Registration Date	2024-06-10
A.6	Legal entity identifier	N/A

A.7	Another identifier required pursuant to applicable national law	CR-410809								
A.8	Contact telephone number	+1345 9250299								
A.9	E-mail address	team@anyone.io								
A.10	Response Time (Days)	Fourteen (14) working days								
A.11	Parent Company	N/A								
A.12	Members of the Management body	<table border="1"> <thead> <tr> <th>Name</th> <th>Role</th> <th>Principal Place of Business</th> </tr> </thead> <tbody> <tr> <td>Glenn Kennedy</td> <td>Director</td> <td>3119 9 Forum Lane, Camana Bay, Grand Cayman KY1-9006 Cayman Islands</td> </tr> </tbody> </table>			Name	Role	Principal Place of Business	Glenn Kennedy	Director	3119 9 Forum Lane, Camana Bay, Grand Cayman KY1-9006 Cayman Islands
Name	Role	Principal Place of Business								
Glenn Kennedy	Director	3119 9 Forum Lane, Camana Bay, Grand Cayman KY1-9006 Cayman Islands								
A.13	Business Activity	<p>The objects for which the Foundation Company is established include:</p> <ul style="list-style-type: none"> (a) to develop and incentivize the growth of the Foundation for Anyone Network, decentralized network and ecosystem; (b) to act as a holding company with no restriction on the objects or operations of its subsidiaries (if any) or on the nature of its or their investments; and (c) to do all such things as in the opinion of the directors are or may be incidental or conducive to the above objects or any of them. <p>Principal markets: European Union digital asset markets; international jurisdictions permitting lawful operation of crypto-assets and decentralized networking protocols.</p>								
A.14	Parent Company Business Activity	(d) N/A								
A.15	Newly Established	True								

A.16	Financial condition for the past three years	As the Foundation was recently established, there is no historical financial data available for the past three years.
A.17	Financial condition since registration	<p>The financial condition of the Anyone Foundation is stable, supported initially by the assets contributed at its establishment and subsequently by the proceeds from liquidity trading fees to its subsidiary companies.</p> <p>As a non-profit and ownerless entity, the Foundation's activities are not directed toward generating profits or securing guaranteed revenues. Its purpose is to follow its governance mandate in the stewardship of the Anyone Protocol. While the Foundation does not rely on traditional business ventures, minor or occasional activities may generate supplementary income that enhances its financial capacity. The Foundation may also receive voluntary contributions or donations in the future, although such inflows cannot be guaranteed.</p> <p>The Foundation is subject to oversight by the competent supervisory authority for foundations, which includes an annual review of management and audit reports. This supervision ensures that the Foundation continues to operate in accordance with its constitutional purpose and governance mandate.</p>
Part B - Information about the issuer, if different from the offeror or person seeking admission to trading		
B.1	Issuer different from offeror or person seeking admission to trading	N/A
B.2	Name	N/A
B.3	Legal form	N/A
B.4	Registered address	N/A
B.5	Head office	N/A

B.6	Registration Date	N/A
B.7	Legal entity identifier	N/A
B.8	Another identifier required pursuant to applicable national law	N/A
B.9	Parent Company	N/A
B.10	Members of the Management body	N/A
B.11	Business Activity	N/A
B.12	Parent Company Business Activity	N/A
Part C- Information about the operator of the trading platform in cases where it draws up the crypto-asset white paper and information about other persons drawing the crypto-asset white paper pursuant to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114		
C.1	Name	N/A
C.2	Legal form	N/A
C.3	Registered address	N/A

C.4	Head office	N/A
C.5	Registration Date	N/A
C.6	Legal entity identifier of the operator of the trading platform	N/A
C.7	Another identifier required pursuant to applicable national law	N/A
C.8	Parent Company	N/A
C.9	Reason for Crypto-Asset White Paper Preparation	N/A
C.10	Members of the Management body	N/A
C.11	Operator Business Activity	N/A
C.12	Parent Company Business Activity	N/A

C.13	Other persons drawing up the crypto-asset white paper according to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114	N/A
C.14	Reason for drawing the white paper by persons referred to in Article 6(1), second subparagraph, of Regulation (EU) 2023/1114	N/A
Part D- Information about the crypto-asset project		
D.1	Crypto-asset project name	Anyone Protocol
D.2	Crypto-assets name	ANyONe Protocol
D.3	Abbreviation	ANYONE
D.4	Crypto-asset project description	Anyone is a decentralized global infrastructure for privacy. By integrating with their onion routing network, apps can provide trustless privacy and secure their network traffic without altering the user experience. The network consists of thousands of nodes that contribute bandwidth in exchange for token rewards.

D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project	<table border="1"> <tr> <td data-bbox="440 359 760 457">Legal</td> <td data-bbox="760 359 1563 457">Leeward Management Ltd Suite 3119, 9 Forum Ln, Grand Cayman KY1-9006, Cayman Islands</td> </tr> <tr> <td data-bbox="440 457 760 491"></td> <td data-bbox="760 457 1563 491"></td> </tr> <tr> <td data-bbox="440 491 760 527">Tech development</td> <td data-bbox="760 491 1563 527">TokenCo For Anyone (BVI) Ltd</td> </tr> </table>	Legal	Leeward Management Ltd Suite 3119, 9 Forum Ln, Grand Cayman KY1-9006, Cayman Islands			Tech development	TokenCo For Anyone (BVI) Ltd
Legal	Leeward Management Ltd Suite 3119, 9 Forum Ln, Grand Cayman KY1-9006, Cayman Islands							
Tech development	TokenCo For Anyone (BVI) Ltd							
D.6	Utility Token Classification	True						
D.7	Key Features of Goods/Services for Utility Token Projects	The ANYONE token is used to facilitate access, control and security within the network, including paying the token to access premium features in the network, and as a means to incentivize relay operators. See section F.02 for more details.						
D.8	Plans for the token	<p>Past Milestones (see all at https://docs.anyone.io/resources/roadmap)</p> <ul style="list-style-type: none"> - Created a global onion routing network, to protect data online - Created a novel DePIN rewards oracle in Arweave, that can function gaslessly and manage over 10,000 nodes in the network - Built targeted DePIN incentives to grow our network to one of the largest onion routing networks in the world - Development and sale of novel hardware devices sold globally <p>Future Milestones</p> <ul style="list-style-type: none"> - Completion of novel data protection SDK that can be used by developers to integrate in their apps - Creation of Desktop VPN app - Staking mechanism for economic security within the network - Paid circuits feature for premium routing. 						
D.9	Resource Allocation	The funds granted to the company at its inception have been used to compensate developers and team members who build out the Anyone Network and its ecosystem, as well as third-party providers who are compensated for past and future support.						
D.10	Planned Use of Collected Funds or Crypto-Assets	The funds will predominantly be used to further develop, build and maintain the Network and its ecosystem.						

Part E - Information about the offer to the public of crypto-assets or their admission to trading		
E.1	Public Offering or Admission to trading	ATTR
E.2	Reasons for Public Offer or Admission to trading	Listing for Accessibility and Liquidity: Listing ANYONE on Trading Platforms ensures broad circulation of the ANYONE Protocol token, thus fostering its accessibility and liquidity.
E.3	Fundraising Target	N/A
E.4	Minimum Subscription Goals	N/A
E.5	Maximum Subscription Goal	N/A
E.6	Oversubscription Acceptance	N/A
E.7	Oversubscription Allocation	N/A
E.8	Issue Price	N/A
E.9	Official currency or other crypto-assets determining the issue price	N/A

E.10	Subscription fee	N/A
E.11	Offer Price Determination Method	N/A
E.12	Total Number of Offered/Traded crypto-assets	90,000,000
E.13	Targeted Holders	ALL
E.14	Holder restrictions	<p>The Ethereum blockchain, on which the ANYONE Token is issued, is a permissionless and decentralized network. At the Ethereum protocol level, there are no restrictions on who may hold ANYONE Tokens.</p> <p>Trading Platforms Trading Platforms, in accordance with applicable laws and internal policies, may similarly impose restrictions on buyers and sellers of ANYONE Tokens. Any checks performed to implement such restrictions, including but not limited to KYC or anti-money laundering (AML) checks, are conducted exclusively by the Trading Platforms and not by the Foundation.</p> <p>Sanctions and Embargoes The Foundation imposes restrictions in its agreements with Launchpads and Trading Platforms, requiring that they exclude persons or entities located in any jurisdiction subject to comprehensive sanctions or embargoes under Swiss or EU law, as well as any person or entity listed on sanctions lists maintained by Switzerland, the European Union, the United Nations, the United Kingdom, or the United States (“Prohibited Persons”).</p> <p>Non-EU Jurisdictions The Foundation may impose additional restrictions on prospective non-EU ANYONE Token holders where necessary to ensure compliance with applicable regulatory frameworks outside the European Union.</p>
E.15	Reimbursement Notice	N/A

E.16	Refund Mechanism	N/A
E.17	Refund Timeline	N/A
E.18	Offer Phases	N/A
E.19	Early Purchase Discount	N/A
E.20	Time-limited offer	N/A
E.21	Subscription period beginning	N/A
E.22	Subscription period end	N/A
E.23	Safeguarding Arrangements for Offered Funds/crypto-assets	N/A
E.24	Payment Methods for crypto-asset Purchase	N/A
E.25	Value Transfer Methods for Reimbursement	N/A

E.26	Right of Withdrawal	N/A
E.27	Transfer of Purchased crypto-assets	N/A
E.28	Transfer Time Schedule	N/A
E.29	Purchaser's Technical Requirements	N/A
E.30	Crypto-asset service provider (CASP) name	Payward Global Solutions LTD
E.31	CASP identifier	9845003D98SCC2851458
E.32	Placement form	NTAV
E.33	Trading Platforms name	Kraken
E.34	Trading Platforms Market Identifier Code (MIC)	PGSL
E.35	Trading Platforms Access	Trading Platforms are accessible via their respective website or applications for mobile devices.

E.36	Involved costs	The use of services offered by Trading Platforms may involve costs, including transaction fees, withdrawal fees, and other charges, as notified to users in advance. These costs are determined and set by the respective Trading Platforms and are not controlled, influenced, or governed by the Foundation. Consequently, any changes to initially announced fee structures or the introduction of new costs for the future are solely at the discretion of the Trading Platforms.
E.37	Offer Expenses	N/A
E.38	Conflicts of Interest	The Foundation is not aware of any potential conflict of interest among its management body members or any other person within the Foundation with respect to the Offer and admission to trading of ANYONE.
E.39	Applicable law	Any dispute arising out of or in connection with this White Paper, the Anyone Foundation, the admission to trading of the ANYONE Token, or any related matters shall be governed exclusively by the laws of Ireland without regard to conflict of law rules or principles, except to the extent that such disputes are governed by applicable law pursuant to the terms and conditions of the respective Trading Platform on which the ANYONE Token has been admitted for trading.
E.40	Competent court	Any dispute, controversy, or claim arising out of or in connection with this White Paper, the Foundation, the Offer and the admission to trading shall be resolved exclusively by arbitration, with the seat of arbitration in Dublin following the UNCITRAL arbitration rules in English, to the extent that such disputes are subject to a dispute resolution mechanism set forth in the terms and conditions of the respective Trading Platform on which the ANYONE token has been admitted for trading.
Part F - Information about the crypto-assets		
F.1	Crypto-Asset Type	Utility token
F.2	Crypto-Asset Functionality	<p>The ANYONE Token has the following functionalities:</p> <p>Access Functionality: The token must be locked by relay operators to participate as a node in the network and receive token incentives.</p> <p>Control Functionality: When the network transitions to a freemium model, the ANYONE token is used to pay premium nodes to access their superior bandwidth or location</p> <p>Security Functionality: The token can be staked by holders toward relay operators</p>

		they trust, in effect delegating ones trust to that operator, and creating an additional layer of security against sybil attacks in the network.
F.3	Planned Application of Functionalities	<p>Staking activation is planned for Q4 2025.</p> <p>SDK release started in Q3 2024, with additional releases planned for Q1 2026.</p> <p>The freemium switch is planned for Q1 2026.</p> <p>Full roadmap info can be found at https://docs.anyone.io/resources/roadmap</p>
F.4	Type of white paper	OTHR
F.5	The type of submission	NEWT
F.6	Crypto-Asset Characteristics	<ul style="list-style-type: none"> • Issued based on the ERC-20 standard. • Issued without any legally enforceable rights or entitlements to their holders (see Section G.01). • Issued to serve as a utility token with the functionalities outlined in Section F.02.
F.7	Commercial name or trading name	Anyone Protocol
F.8	Website of the issuer	https://anyone.io/
F.9	Starting date of offer to the public or admission to trading	2025-12-22
F.10	Publication date	2025-12-05

F.11	Any other services provided by the issuer	N/A
F.12	Language or languages of the white paper	English
F.13	Digital Token Identifier	N/A
F.14	Functionally Fungible Group Digital Token Identifier	N/A
F.15	Voluntary data flag	False
F.16	Personal data flag	True
F.17	LEI eligibility	False
F.18	Home Member State	Ireland
F.19	Host Member States	<ul style="list-style-type: none"> 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.

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

G.1	Purchaser Rights and Obligations	<p>The ANYONE token is a utility token as defined in Article 3(1)(9) of Regulation (EU) 2023/1114. It does not confer ownership, equity, voting, dividend, governance, or similar rights in the Foundation or in any legal entity. Holding ANYONE tokens only enables access to and participation in the Anyone Protocol as described in this White Paper.</p> <p>To the fullest extent permitted by applicable law, the Foundation does not provide any representation or warranty, whether express or implied, regarding the future value, liquidity, or uninterrupted availability of the ANYONE token or the Network.</p> <p>The Foundation shall not be liable for losses arising from normal use, transfer, or interactions with the ANYONE token or the Network, except where liability cannot be excluded under applicable law (including liability for fraud, willful misconduct, or gross negligence).</p> <p>Token holders are responsible for safeguarding their private keys, complying with applicable law, and ensuring lawful use of the Network.</p>
G.2	Exercise of Rights and obligations	<p>Exercise of rights: Holding ANYONE tokens enables the holder to use them within the Anyone Protocol. This includes (i) staking tokens to operate or support relay nodes, (ii) participating in bandwidth allocation or voluntary network voting processes on matters related to technical or community matters without any legally enforceable governance rights as described in this White Paper, and (iii) using tokens as payment for access to premium or high-throughput services on the Network.</p> <p>Process: Rights are exercised by interacting with the Anyone Protocol's smart contracts deployed on the Ethereum blockchain. Token holders may use supported wallets and interfaces to stake, transfer, or spend tokens. Technical requirements (e.g. wallet compatibility, gas fees) apply.</p> <p>Obligations: Token holders are responsible for: (i) safeguarding their private keys and access credentials; (ii) ensuring their use of the Network complies with applicable law; and (iii) covering transaction costs (e.g. gas fees) when interacting with the smart contracts.</p> <p>Limitations: Admission to trading does not create ownership, equity, or creditor rights in the Foundation. The ability to exercise rights depends on technical conditions of the Ethereum blockchain and the operational status of the Network.</p>

G.3	Conditions for modifications of rights and obligations	<p>General principle: The ANYONE token, when admitted to trading, does not confer ownership, equity, or creditor rights. Its sole function remains access to and use within the Anyone Protocol.</p> <p>Protocol upgrades: Functionalities linked to the token may evolve as a result of protocol upgrades or improvements. Any modification to staking, governance, or service access mechanisms will be implemented via updated smart contracts and disclosed publicly.</p> <p>Governance processes: Where changes affect token utility, they will be determined in accordance with the decentralized governance framework of the Anyone Protocol and communicated to the market.</p> <p>Disclosure obligations: In line with Article 12 of MiCA, any material modification of the rights or obligations of token holders will require an update of this White Paper. Updated versions will be made available on the Foundation’s official website and notified to the competent authority.</p> <p>Limitations: Admission to trading does not alter the nature of the token. No modification can create ownership, profit-sharing, or creditor rights in the Foundation.</p>
G.4	Future Public Offers	no defined plans for such offers.
G.5	Issuer Retained Crypto-Assets	At the date of this White Paper, the Foundation retains 4,100,000 ANYONE in its treasury.
G.6	Utility Token Classification	True
G.7	Key Features of Goods/Services of Utility Tokens	<p>Access Functionality: The token must be locked by relay operators to participate as a node in the network and receive token incentives.</p> <p>Control Functionality: When the network transitions to a freemium model, the ANYONE token is used to pay premium nodes to access their superior bandwidth or location</p> <p>Security Functionality: The token can be staked by holders toward relay operators they trust, in effect delegating ones trust to that operator, and creating an additional layer of security against sybil attacks in the network.</p>

G.8	Utility Tokens Redemption	<p>The functionalities described can be redeemed by using of the Network and calling the appropriate functions thereof.</p> <p>No fiduciary redemption exists.. Holders cannot redeem ANYONE tokens for fiat currency or other assets. Admission to trading on a platform does not create any redemption right.</p>
G.9	Non-Trading request	True
G.10	Crypto-Assets purchase or sale modalities	N/A
G.11	Crypto-Assets Transfer Restrictions	<p>The ANYONE token is freely transferable on the Ethereum blockchain once admitted to trading. There are no contractual or statutory restrictions on its transferability imposed by the Foundation.</p> <p>However, transfers remain subject to applicable laws and regulations, including anti-money laundering, counter-terrorist financing, and sanctions compliance requirements. Additionally specified under pointE.14</p>
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	Laws of the Cayman Islands
G.19	Competent court	Any dispute, controversy, or claim arising out of or in connection with this White Paper, the Foundation, the Offer and the admission to trading shall be resolved exclusively by arbitration, except to the extent that such disputes are subject to a dispute resolution mechanism set forth in the terms and conditions of the respective Trading Platform on which the ANYONE token has been admitted for trading.

Part H – information on the underlying technology

H.1	Distributed ledger technology	<p>General Information on Distributed Ledger Technology and Blockchain</p> <p>Distributed Ledger Technology (“DLT”) refers to a decentralized and distributed network system architecture in which multiple participants collectively maintain and verify a shared database. Unlike traditional centralized databases, DLT systems do not depend on a single authority for consistency and security. Instead, control is distributed across many independent computers (nodes). Transactions or records are validated according to pre-defined rules and then stored in a way that ensures consensus among participants.</p> <p>This distributed design offers several benefits:</p> <ul style="list-style-type: none"> • Resilience: Since data is stored across many nodes, the system is more resistant to single points of failure. • Security: Transactions are cryptographically secured, reducing the risk of tampering. • Transparency: Data stored on most DLTs can be publicly verified.
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		<ul style="list-style-type: none"> • Trust minimization: Participants do not need to place trust in a central authority, as the system itself enforces correctness. <p>Blockchain technology is the most widely known type of DLT. In a blockchain, records are stored in blocks that are linked together sequentially, forming a chain. Key characteristics of blockchains include:</p> <ul style="list-style-type: none"> • Security: Each block contains a cryptographic hash of the previous block, a timestamp, and transaction data, creating a tamper-resistant history. • Consensus: Blockchains rely on mechanisms (e.g., Proof-of-Work, Proof-of-Stake) to agree on the validity of new blocks. • Immutability: Once data is recorded and confirmed, it cannot be changed retroactively without consensus of the majority of the network. • Transparency: Public blockchains allow participants to view transactions, increasing accountability. Private blockchains can limit this visibility. • Accessibility: Permissionless blockchains allow anyone to join as a participant, while permissioned blockchains restrict participation to approved entities
H.2	Protocols and technical standards	<p>The ANYONE token relies on the following protocols:</p> <ul style="list-style-type: none"> • Those of the blockchain on which it is issued, as described under H.01. • Those of its issuance smart contracts, based on the ERC-20 standard defining rules, notably, for token transactions and interactions.
H.3	Technology Used	<p>Other information on the technology used for holding, storing and transferring crypto-assets, if relevant</p>
H.4	Consensus Mechanism	<p>The consensus mechanism of Ethereum is a PoS (proof-of-stake) system known as the Beacon Chain, which coordinates the network by selecting validators who propose and validate new blocks. Validators are chosen based on the amount of ETH they have staked, rather than computational power, significantly reducing Ethereum's energy consumption by over 99% compared to PoW.</p> <p>Ethereum has over 800,000 validators as of date of writing.</p>
H.5	Incentive Mechanisms and Applicable Fees	<p>Ethereum transactions, such as the transfer of ICNT, require gas fees, which compensate validators for processing transactions and executing smart contracts.</p> <p>The EIP-1559 upgrade introduced a base fee model to improve fee predictability and burn a portion of transaction fees, reducing ETH inflation. As a result, the key fee components are the following:</p> <ul style="list-style-type: none"> • Base Fee: Minimum amount burned per transaction, adjusting dynamically based on network demand. As a result, ETH has periodically become

		<p>deflationary when network activity is high, as more ETH is burned than issued, reducing overall supply.</p> <ul style="list-style-type: none"> • Priority Fee (Tip): Optional fee paid to incentivize faster transaction processing. • Max Fee: Maximum gas price a user is willing to pay, ensuring cost control. Trading Platforms may besides charge service fees in accordance with their own policies.
H.6	Use of Distributed Ledger Technology	False
H.7	DLT Functionality Description	N/A
H.8	Audit	True
H.9	Audit outcome	<p>The Issuer committed to completing an audit of its ERC20 smart contract implementation, resulting in no major issues found. The audit was completed 17th June 2024.</p> <p>Auditor: Entersoft Australia Pty Ltd.</p>
J – Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts		

<p>J.1</p>	<p>Adverse impacts on climate and other environment-related adverse impacts</p>	<p>The Foundation is providing information on principal adverse impacts of ANYONE on the climate and other environment-related adverse impacts of the consensus mechanism of the following:</p> <p>Ethereum, the blockchain on which the ANYONE token is issued and the primary blockchain where it will be transacted by its holders. There will be some level of activity on Ethereum, as holders transfer or swap the token on various exchanges. In the months that the ANYONE token has been live, there have been 52.940 transactions executed directly on the ANYONE Protocol smart contract, which equates to an average of 3300 transactions per month. Sampling of those transactions reveal that 95% of these are ERC20 Approve or Transfer transactions. Additionally, there are around 10,000 transactions per month initiated on other smart contracts that involve the ANYONE token, such as swap or transfer transactions. However, given that Ethereum has moved to a Proof-of-Stake model, these contribute to minimal electricity usage. According to the EU Blockchain Observatory, the average PoS transaction consumes 6.29Wh of electricity per transaction, putting the total energy consumption of ANYONE transactions at 83.66kWh per month, which is approximately 1003.92 per year. This is also likely an overestimate, given how opcode-light functions such as Approve are.</p> <p>Operation of DePIN Network. The primary network governed by Anyone is a global DePIN network made up of nodes around the world. Currently, there are 7000 active nodes in the network capable of relaying over 70GBps of bandwidth per second. The majority of these nodes operate on cloud servers hosted by providers such as Hetzner. The average such server (fulfilling a RAM requirement of 4GB) consumes, at max capacity, 180W, equating to an average 130kWh per server, so a total of 0.9M kWh monthly from nodes in the network (though this is a likely overestimate as the network includes smaller servers or nodes hosted on users' small personal hardware devices). Hetzner and similar providers also use 100% clean energy.</p> <p>However, this usage is separate to the functioning of the ANYONE token and may not be included in the scope of the environmental impact of the token.</p>
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