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01 Date of notification 01/07/2025	
	•
accordance with competent authority in any Member State of the European	
Article 6(3) of Union. The person offering the crypto-asset to the public	
Regulation (EU) solely responsible for the content of this crypto-asset whi paper.	ile
-	
O3 Compliance This crypto-asset white paper complies with Title II of	1
statement in Regulation (EU) 2023/1114 and, to the best of the knowledge o	_
accordance with of the management body, the information presented in the	
Article 6(6) of crypto-asset white paper is fair, clear and not misleading	
Regulation (EU) the crypto- asset white paper makes no omission likely to	)
2023/1114 affect its import.	
O4 Statement in The crypto-asset referred to in this white paper may lose	
accordance with value in part or in full, may not always be transferable an	d may
Article 6(5), points not be liquid.	
(a), (b), (c) of	
Regulation (EU)	
2023/1114	
05 Statement in FALSE	
accordance with	
Article 6(5), point (d)	
of Regulation (EU)	
2023/1114	

06	Statement in accordance with	The crypto-asset referred to in this white paper is not covered by the investor compensation schemes under Directive
	Article 6(5), points (e) and (f) of	97/9/EC of the European Parliament and of the Council.
	Regulation (EU) 2023/1114	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	Warning
	accordance with Article 6(7), second subparagraph of Regulation (EU) 2023/1114	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.
		Summary
08	Characteristics of the crypto-asset	The PUMP crypto-asset is the official 'memecoin' of the pump.fun memecoin launch platform and the swap.pump.fun automated market maker (AMM) protocol (together, the "Pump.Fun Protocols"). The PUMP crypto-asset will not be required in order to utilize the Pump.Fun Protocols, which remain permissionless. Holders of the PUMP crypto-asset may opt to participate in promotional give aways from the Pump.Fun Protocols. The PUMP crypto-asset is a 'memecoin' that will be used to promote the pump.fun brand behind the Pump.Fun Protocols.
09	Key Information about the Quality and Quantity of the Goods or Services to which the Utility Tokens give Access Restrictions on	Not applicable
	Transferability.	

	1	
10	Key information	The PUMP crypto-asset is a 'memecoin' that will be used to
	about the offer to the	promote the pump.fun brand behind the Pump.Fun Protocols.
	public or admission	PUMP qualifies as an "Other Crypto-Asset" under MiCA's
	to trading	Title II.
		Part I – Information on risks
I.1	Offer-Related Risks	The offeror does not control, oversee, or manage the functioning of the Exchanges where the PUMP token ("Token") of the Pump.fun project ("Project") will be admitted. Additionally, the Token's underlying protocol and governance structure may evolve due to ongoing technical, regulatory, and industry developments. Unforeseen risks may arise, and new challenges or opportunities may necessitate changes in the Solana network ("Network")'s strategies, goals, and structure. The risks outlined below highlight regulatory uncertainty, liquidity limitations, governance risks, network centralization concerns, security vulnerabilities, and potential adjustments to fees or token supply that could impact the offer and trading of the Token.
		<ul> <li>• Regulatory Compliance Risks: Although the Token is designed to comply with existing regulations (such as MiCA), evolving regulatory landscapes could impact its classification, trading status, or market acceptance. Changes in regulatory requirements may necessitate modifications to the Project's operation, structure, or governance. Purchasers must ensure compliance with local laws, as regulatory treatment of crypto-assets varies across jurisdictions.</li> <li>• Market Volatility: The Token is subject to notable price fluctuations, influenced by speculation, market sentiment, and broader industry trends. External factors, such as regulatory announcements or technological developments, may further contribute to volatility, potentially leading to financial losses for holders.</li> <li>• Liquidity Risks: The ability to buy and sell Tokens depends on trading activity on decentralized exchanges ("DEXs") and, if applicable, centralized exchanges ("CEXs"). Limited liquidity may result in difficulties executing large trades without significant price impact, increasing the risk of loss.</li> <li>• Risk of Trading Platforms: When Token holders trade on Exchanges, the Issuer does not act as a contractual party to these transactions. All legal relationships regarding these trading platforms are subject to their respective terms and conditions, with no responsibility assumed by the Issuer for their operations, services, or outcomes.</li> <li>• Risk of Delisting: There is no guarantee that the Token will</li> </ul>

remain listed on any exchange. Delisting could significantly hinder the ability to trade Tokens, reducing liquidity and market value.

- *Risk of Bankruptcy*: The Exchanges or trading platforms where the Token is listed may become insolvent or cease operations, potentially resulting in a loss of access to funds or Tokens.
- *Blockchain and Smart Contract Dependency*: The Token relies entirely on its blockchain infrastructure. Any network downtime, congestion, security vulnerabilities, or smart contract failures could negatively impact its functionality, accessibility, or security.
- Governance and Economic Model Risks: The current model relies on existing token allocations and does not incorporate inflation. However, governance decisions or operational needs may necessitate future adjustments, potentially introducing inflationary mechanisms or modifications to the fee structure.
- *Operational Risks*: Risks associated with the Issuer's internal processes, personnel, and technologies may impact the ability to manage the Token's operations effectively. Failures in operational integrity could lead to disruptions, financial losses, or reputational damage.
- *Financial Risks*: The Issuer may face financial risks, including liquidity shortages, credit risks, or market fluctuations, which could affect its ability to continue operations, meet obligations, or sustain the stability and value of the Token.
- *Legal Risks*: Uncertainties in legal frameworks, regulatory changes, potential lawsuits, or adverse legal rulings could pose significant risks, affecting the legality, usability, or value of the Token.
- *Reputational Risks*: Negative publicity—whether due to operational failures, security breaches, or associations with illicit activities—could damage the Issuer's reputation and, by extension, impact the value and acceptance of the Token.
- *Technology Management Risks*: Inadequate management of technological updates or failure to keep pace with advancements may result in security vulnerabilities, inefficiencies, or obsolescence of the Token and its supporting infrastructure.
- Conflicts of Interest: Misalignment of interests between the Issuer and Token holders may lead to governance decisions that are not in the best interests of the community, potentially affecting the value of the Token or damaging the credibility of the project.
- Counterparty Risks: The Issuer's reliance on external

I.2	Issuer-Related Risks	partners, service providers, and collaborators introduces risks related to non-fulfilment of obligations, which may affect the Token's operations, liquidity, or overall ecosystem stability.  • Industry Competition Risks: The Issuer faces competition from other projects, including larger and well-funded ventures that may attract more users and liquidity, potentially diminishing the viability of the Token.  • Vesting Risks: While the team and Issuer's Tokens are subject to a vesting schedule to prevent 'rug pulls' and conflicts of interest, the unlocking of Tokens over time could introduce selling pressure.  • Speculative Nature of the Token: The Token has no inherent utility beyond market sentiment and community-driven interest. Its value is highly speculative and subject to fluctuations based on external perceptions.  • Unanticipated Risks: There may be additional risks that cannot be foreseen. Some risks may materialize as unexpected variations or combinations of the factors discussed in this section.
1.2	Issuer-Related Risks	Not applicable, as the Issuer is the same as the person offering the Token to the public.
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# I.3 Crypto-Assets-related Risks

- *Market Volatility Risks*: The Token's value is highly volatile and may fluctuate due to market speculation, investor sentiment, regulatory developments, and technological advancements. External factors, such as shifting trends in the crypto industry, changes in demand for blockchain services, or macroeconomic conditions, could contribute to extreme price fluctuations, potentially leading to total depreciation.
- *Speculative Nature*: No assurances of future value, performance, or rewards are made regarding the Token. Other than as stated herein with respect to the rights, functions or other utilities that may be introduced by governance votes, the Token has no inherent or guaranteed utility beyond its role in the Project, and its valuation depends entirely on user adoption, market demand, and community engagement. If adoption of the Network fails to grow as expected, the Token's value may be significantly impacted.
- *Liquidity Risks*: The ability to trade the Token depends on the level of activity on decentralized exchanges ("*DEXs*") and, where applicable, centralized exchanges ("*CEXs*"). Low trading volume may result in difficulties executing large transactions without significant price impact. Limited demand for the Token or the underlying protocol may further reduce liquidity, making it difficult to acquire or sell the Token.
- Adoption and Network Demand Risks: The long-term success of the Token is dependent on widespread adoption of the Network. Adoption is influenced by various external factors, including user demand, competitive market conditions, and organic community-driven expansion. The Issuer has no control over the pace of adoption, and there is no guarantee that the Network will gain sufficient traction to sustain its economic model. If demand is too low, obtaining services through the Network may be difficult, while an inadequate supply may lead to delays in accessing services.
- *Blockchain Dependency Risks*: The Token operates exclusively on its underlying blockchain network. Any disruptions, such as network congestion, downtime, or security vulnerabilities, could impact the ability to transfer, store, or trade the Token. Changes to blockchain infrastructure, governance, or transaction fees may also influence the Token's usability and cost-effectiveness.
- *Transaction Costs*: While blockchain fees are generally low, network congestion, high demand, or changes in blockchain fee structures may increase transaction costs, potentially reducing the economic viability of using the Token within the Project.

#### • Security Risks:

- *Smart Contract Vulnerabilities*: Despite security audits and best practices, unforeseen vulnerabilities in smart contracts could lead to security breaches, impacting Token security or functionality.
- *Private Key Management*: Token holders are solely responsible for safeguarding their private keys and recovery phrases. Loss of wallet credentials will result in the permanent loss of Tokens, as blockchain transactions are irreversible.
- *Scam and Fraud Risks*: Token holders are exposed to risks associated with scams, phishing attacks, fake giveaways, impersonation of the Issuer or its team, counterfeit Tokens, and fraudulent airdrops. Engaging with unverified third-party platforms or unofficial communications increases the risk of fraud.
- *Community and Narrative Risks*: The Token's success is closely tied to community interest and the broader crypto narrative. Market trends, emerging competitors, or declining community engagement may negatively impact the Token's perceived value and adoption.

## • Regulatory and Compliance Risks:

- *Evolving Legal Frameworks*: Regulations governing cryptoassets differ across jurisdictions and are subject to change. New legal requirements may impact the Token's classification, availability, or functionality.
- *Jurisdictional Restrictions*: Some jurisdictions may impose restrictions or prohibitions on the trading or use of the Token, limiting its accessibility for certain users.
- *Regulatory Harmonization Risks*: A lack of global regulatory alignment may create uncertainty, with some authorities potentially classifying the Token as a security or financial instrument, leading to increased compliance costs and legal obligations.
- *Regulatory Enforcement Risks*: Government agencies may take enforcement actions against the Issuer if the Token is deemed an unregistered security or if other financial laws are found to have been violated. Such actions could negatively impact the Token's availability, marketability, and value.
- Anti-Money Laundering ("AML") & Counter-Terrorism Financing ("CTF") Risks: Crypto transactions may be scrutinized for potential links to illicit activities. Authorities may take action against wallets or platforms suspected of facilitating money laundering or terrorist financing, affecting the ability of Token holders to use or trade their assets.

- *Taxation Risks*: The tax treatment of the Token varies by jurisdiction, and Token holders are solely responsible for understanding and complying with applicable tax laws. Any appreciation, conversion, or sale of the Token may trigger tax obligations that differ depending on the regulatory environment.
- *Vesting and Token Release Risks*: Tokens allocated to the team and other stakeholders are subject to a vesting schedule. When these Tokens are released into circulation, they may introduce additional selling pressure, which could impact market prices.
- *Technological Obsolescence Risks*: The blockchain and crypto industries evolve rapidly. The emergence of new technologies, changes in market demand, or advancements in competing protocols could render the Token or its underlying blockchain infrastructure less competitive, reducing adoption and utility.
- *Software Weakness Risks*: The Token's infrastructure relies on relatively new blockchain technologies, which may contain undiscovered bugs, vulnerabilities, or inefficiencies. There is no guarantee that the process of transacting, storing, or interacting with the Token will be uninterrupted or error-free.
- *Unanticipated Risks*: Beyond the risks outlined above, additional unforeseen risks may emerge due to changes in regulatory, technological, or market conditions, potentially affecting the Token's security, functionality, or value.

# I.4 Project ImplementationRelated Risks

The offeror does not operate, control, oversee, or manage the technology underlying the Project. While efforts are made to ensure security and stability, blockchain-based technologies are still evolving, and various risks exist. Additionally, the success and sustainability of the project rely on various external factors, including market conditions, regulatory developments, and technological advancements.

#### • Technical Development Risks:

- *Smart Contract Issues*: Despite robust security measures, unforeseen vulnerabilities or bugs in the smart contracts could disrupt Token distribution, refunds, or vesting mechanisms.
- *Blockchain Dependency*: The Token operates exclusively on its underlying blockchain. Any network congestion, downtime, or security breaches could impact the project's implementation and functionality.
- Risk of Security Weaknesses in Core Infrastructure: The project relies on open-source software, which may be modified by third parties not directly affiliated with the Issuer. Weaknesses or bugs introduced into the core infrastructure could compromise security and lead to the loss of digital assets. Furthermore, malfunctions or inadequate maintenance of the Network may negatively impact the Token's usability.
- *Bugs in Core Blockchain Code*: Even with rigorous testing, unknown bugs may exist in the blockchain protocol, potentially leading to disruptions, incorrect transaction processing, or security vulnerabilities.

### • Regulatory and Compliance Risks:

- Regulatory Actions in One or More Jurisdictions: The Token and the underlying Network could be impacted by regulatory inquiries or actions, which may restrict further development, implementation, or usage.
- *Evolving Laws and Regulations*: New and changing laws related to financial securities, consumer protection, data privacy, cybersecurity, and intellectual property could impact the project. Compliance with these laws may require significant resources and could impose additional operational constraints.
- *Governance Risk*: Decision-making mechanisms in blockchain governance may be inefficient, slow, or disproportionately influenced by specific stakeholders, leading to potential centralization or unfavourable network changes.

#### • Operational Risks:

• Team Vesting Risks: While the team's Tokens are subject to

a vesting schedule to align interests with the community, the eventual unlocking of these Tokens may impact market stability or long-term commitment from team members.

#### • Market Adoption Risks:

- *Competitive Environment*: The crypto market is highly competitive and trend-driven. There is a risk that the Token may fail to capture sufficient interest, limiting its adoption.
- *Community Engagement Risks*: The success of the Token depends heavily on community-driven marketing and engagement. Failure to build or sustain an active community could hinder growth and long-term tradability.

#### • Ecosystem Risks:

- *Dependence on External Partners*: The project relies on partnerships with infrastructure providers, exchanges, market makers, and other third-party service providers. Any failure or delay from these partners could disrupt implementation plans.
- *Risk of Withdrawing Partners*: The Token holder understands that the feasibility of the project depends strongly on the collaboration of service providers and other key stakeholders. A loss of critical partnerships could impact project sustainability.

#### Technology and Software Risks:

- *Risk of Software Weakness*: The Token holder acknowledges that blockchain and smart contract technologies are still evolving. There is no guarantee that Token usage will be uninterrupted or error-free. Vulnerabilities in the underlying blockchain, smart contracts, or supporting technologies could lead to the complete loss of Tokens or their functionality.
- *Dependency on Underlying Technology*: The Network relies on blockchain infrastructure, hardware, and network connectivity, all of which may be subject to failures, outages, or vulnerabilities.
- *Risk of Technological Disruption*: The emergence of new technology, such as quantum computing, could undermine the security of blockchain encryption and compromise the integrity of digital assets.

#### • Network Security Risks:

• Network Attacks and Cybersecurity Threats: Blockchain networks can be vulnerable to cyberattacks such as 51% attacks, Sybil attacks, or distributed denial-of-service ("DDoS") attacks. These threats could disrupt network operations and compromise security.

• *Blockchain Network Attacks*: The Network may be subject to mining attacks, including double-spend attacks, reorganizations, majority mining power attacks, "vampire" attacks, "selfish-mining" attacks, and work race condition attacks. Successful attacks could compromise the proper execution of transactions and smart contracts.

#### • Privacy and Anonymity Risks:

• *Public Ledger Transparency*: Blockchain transactions are recorded on a public ledger, which may expose transaction history and financial activity. Certain transactions could be linked to specific wallet addresses, making users vulnerable to fraud, phishing attacks, or targeted scams.

## • Economic and Governance Risks:

- *Consensus Failures or Forks*: Errors in the consensus mechanism could lead to forks, where multiple versions of the ledger coexist, or network halts, reducing trust in the network.
- *Economic Self-Sufficiency*: The long-term sustainability of the Token ecosystem depends on sufficient transaction volume to support validator incentives and maintain network security. A lack of adoption could lead to governance-driven changes to monetary policy, fee structures, or consensus mechanisms.
- *Incentive Model Risks*: Changes to block rewards, staking incentives, or governance models may be required to maintain network participation. Governance decisions could result in modifications that impact Token holders, including inflationary adjustments, transaction fees, or redistribution of rewards.

#### • Software Weakness Risks:

• Unforeseen Bugs and Security Vulnerabilities: The Token and its supporting infrastructure rely on blockchain technologies that may still be evolving. There is no guarantee that Token transactions will be uninterrupted or error-free. Software vulnerabilities, weaknesses in smart contracts, or infrastructure issues may result in loss of assets, security breaches, or unexpected network failures.

#### • Unanticipated Risks:

• Unforeseen Regulatory, Technological, or Market Challenges: In addition to the risks identified, new threats may emerge due to changes in legal, technological, or economic conditions. Developments such as regulatory crackdowns, unforeseen Network vulnerabilities, or disruptive innovations

could impact the usability, security, or value of the Token in ways not currently foreseeable.

# I.5 Technology-Related Risks

The offeror does not operate, control, oversee, or manage the technology underlying the Project. While efforts are made to ensure security and stability, blockchain-based technologies are still evolving, and various risks exist.

# • Blockchain Dependency Risks:

- *Network Downtime and Congestion*: The Token relies entirely on its underlying blockchain network, which may experience outages, congestion, or downtime. Such events could disrupt Token transfers, trading, or other functionalities.
- *Scalability Challenges*: As transaction volume grows, the blockchain network may face scaling limitations. Increased congestion could lead to slower transaction processing times and higher fees, reducing efficiency and usability.
- Settlement and Transaction Finality Risks: Blockchain transactions are designed to be irreversible; however, under exceptional circumstances such as network forks or consensus failures, there remains a theoretical risk that transactions could be reversed or multiple competing ledger versions could persist. Transactions sent to an incorrect address are not recoverable, leading to permanent loss of assets.

#### • Smart Contract Risks:

- *Vulnerabilities*: While smart contracts are developed with security measures, undiscovered vulnerabilities or exploits may impact Token security, distribution, or vesting schedules. Bugs in the contract code may lead to unintended loss of Tokens, unauthorized transactions, or exposure to external attacks.
- *Immutability Risks*: Once deployed, some smart contracts cannot be altered. Errors or security flaws in the code could result in operational failures without the possibility of corrections.
- *Security Exploits*: Bugs or vulnerabilities in smart contracts may expose the Token ecosystem to potential hacks, allowing attackers to manipulate transactions, drain liquidity, or disrupt contract execution.

## • Network Security Risks:

- *Risk of Attacks and Forks*: The blockchain may be susceptible to consensus-related attacks, such as double-spend attacks, majority validation power takeovers, censorship attacks, or forks. These risks could affect Token transactions, balance integrity, and overall network security.
- *Cybercrime and Theft Risks*: Despite security efforts, blockchain-based assets and services may be exposed to

cyberattacks, including hacking, phishing, or malware threats. Compromised wallets, exchanges, or smart contracts could lead to asset theft, loss of funds, or disruptions in Token functionality.

• *Data Corruption Risks*: The reliability of blockchain data could be compromised due to software bugs, human error, or deliberate tampering. Such incidents may affect transaction records, network integrity, and user confidence in the system.

#### • Wallet and Storage Risks:

- *Private Key Management*: Token holders are solely responsible for securing their private keys and recovery phrases. The loss of private keys results in irreversible loss of Tokens, as blockchain transactions are final and cannot be undone.
- *Compatibility Issues*: The Token is supported only by blockchain-compatible wallets. Incompatibility with specific wallet software, network malfunctions, or wallet provider shutdowns may affect access to and usability of the Token.

#### • Ecosystem Dependency Risks:

- **DEX and CEX Integration Issues**: The Token's availability depends on integration with decentralized exchanges ("**DEXs**") and centralized exchanges ("**CEXs**"). Technical failures, security breaches, or de-listings from these platforms could limit liquidity, disrupt trading, and reduce market accessibility.
- *Reliance on Third-Party Services*: Many blockchain services, including wallets, bridges, and oracles, depend on third-party providers. Failures, security breaches, or regulatory actions against these services could negatively affect the functionality of the Token.
- *Centralization Concerns*: Although blockchain networks are designed to be decentralized, a small number of validators or node operators could introduce centralization risks. This may lead to potential censorship, control over transactions, or increased vulnerability to governance attacks.

#### • Software and Network Risks:

- *Bugs in Core Blockchain Code*: Despite rigorous testing, undiscovered bugs in the core blockchain protocol could lead to network failures, incorrect transaction processing, or security vulnerabilities. A failure to address such issues promptly could result in loss of user confidence and network instability.
- *Risk of Technological Disruption*: Emerging technologies, such as quantum computing, could potentially compromise

blockchain encryption, making networks vulnerable to attacks that could compromise data integrity or enable unauthorized asset transfers.

• Dependency on Underlying Technology: The stability of the Token ecosystem relies on underlying technical infrastructures, including internet connectivity, computing hardware, and cryptographic algorithms. Disruptions in these foundational technologies may impact network security and operational efficiency.

## • Privacy and Anonymity Risks:

- *Public Ledger Transparency*: Blockchain transactions are recorded on a publicly accessible ledger, which may expose sensitive transaction data. While addresses do not directly reveal identities, sophisticated data analysis could potentially link certain transactions to specific individuals or entities.
- Exposure to Fraud and Targeted Attacks: Increased transparency may lead to risks such as phishing, fraud, or unauthorized tracking of user activity by malicious actors. Individuals with significant Token holdings may be targeted for scams or social engineering attacks.

## • Economic and Network Viability Risks:

- *Economic Self-Sufficiency*: The long-term sustainability of the Token ecosystem depends on maintaining sufficient transaction volume to ensure network security and incentivize participants. If network adoption remains low, there is a risk of reduced validator participation, increased transaction costs, or a need for governance-driven changes to monetary policy, fee structures, or consensus mechanisms.
- *Incentive Model Risks*: Changes to block rewards, staking incentives, or governance models may be required to ensure ongoing network security and sustainability. Governance proposals may introduce modifications that impact Token holders, including inflation adjustments, transaction fees, or redistribution of rewards.

#### • Software Weakness Risks:

• *Unforeseen Bugs and Security Vulnerabilities*: The Token and its supporting infrastructure rely on blockchain technologies that may still be evolving. There is no guarantee that Token transactions will be uninterrupted or error-free. Software vulnerabilities, weaknesses in smart contracts, or infrastructure issues may result in loss of assets, security breaches, or unexpected network failures.

		• Unanticipated Risks: • Unforeseen Regulatory, Technological, or Market Challenges: In addition to the risks identified, new threats may emerge due to changes in legal, technological, or economic conditions. Developments such as regulatory crackdowns, unforeseen Network vulnerabilities, or disruptive innovations could impact the usability, security, or value of the Token in ways not currently foreseeable.
I.6	Mitigation measures	<ul> <li>While PUMP operates as a memecoin without intrinsic utility, several measures help mitigate identified risks:</li> <li>Technical and Security Mitigation:</li> <li>Established blockchain infrastructure: PUMP operates on Solana, a mature Proof-of-Stake blockchain with established security protocols and a track record since 2020.</li> <li>Standard token implementation: Uses the widely-adopted SPL token standard, reducing implementation-specific risks through battle-tested code.</li> <li>No complex smart contracts: As a simple SPL token, PUMP avoids risks associated with complex DeFi protocols or experimental mechanisms.</li> <li>Operational and Governance Mitigation:</li> </ul>

• Fixed supply model: Total supply of 5 billion tokens with no inflation mechanisms prevents dilution through additional issuance. • *Team token vesting*: Implementation of vesting schedules for team allocations (750 million tokens) helps prevent sudden market dumps and aligns long-term interests. • *Transparent token distribution*: Clear allocation framework with defined percentages for public offer, team retention, and operational use. • Financial and Regulatory Mitigation: • MiCA compliance framework: Proactive compliance with EU regulations through comprehensive white paper disclosure and regulatory notification process. • Safeguarded offering process: Use of FORIS DAX MT Limited (crypto.com). as custodian during subscription period provides institutional-grade safeguarding of collected funds. • Right of withdrawal: Purchasers maintain withdrawal rights throughout the subscription period, providing investor protection until trading begins. • Market and Liquidity Mitigation: • Established platform association: Connection to the pump.fun ecosystem provides brand recognition and potential user base. • Professional market making: Engagement with institutionalgrade service providers for trading platform integration. • Geographic diversification: Multi-jurisdictional offering across EU member states reduces concentration risk. • Limitations of mitigation: • Speculative nature: No mitigation can address the fundamental speculative nature and lack of intrinsic utility. • Market volatility: External market forces remain largely outside issuer control. • **Regulatory evolution**: Changing regulatory landscape may require operational adjustments despite current compliance efforts. Information about the offeren on the manager goalring admission to tradin

Pa	Part A – information about the offeror or the person seeking admission to trading		
A.1	Name	Golden Fields Partners Limited	
A.2	Legal form	Company limited by shares	
A.3	Registered address	Trinity Chambers, PO Box 4301, Road Town, Tortola, British Virgin Islands	

A.4	Head office	Trinity Chambers, PO Box 4301, Road Town, Tortola, British Virgin Islands
A.5	Registration Date	25/09/2024
A.6	Legal entity identifier	N/A
A.7	Another identifier required pursuant to applicable national law	2158899
A.8	Contact telephone number	12062717417
A.9	E-mail address	legal@pump.fun
A.10	Response Time (Days)	Fourteen (14) days
A.11	Parent Company	Dynamic Solutions
A.12	Members of the Management body	DLT Management, Ltd. and Dynamic Solutions.
A.13	Business Activity	The development of software in relation to blockchain-based protocols, and the issuance of the PUMP token.
A.14	Parent Company Business Activity	The parent company's sole business activity is that of acting as a holding company.
A.15	Newly Established	TRUE
A.16	Financial condition for the past three years	Golden Field Partners Limited has not yet been subject to a financial audit, since it was established in 2024.
A.17	Financial condition since registration	Golden Fields Partners Limited maintains strong financial health and operational capacity since its establishment in September 2024. The company has sufficient funding to support operational requirements, including the development and launch of the PUMP token offering, ongoing legal and regulatory compliance, and business operations through completion of the public offering and beyond.
		Financial Position: The company holds USD \$500,000 in liquid assets to cover minimum operational requirements over the next 16 months, including development costs of around USD \$75,000, legal and regulatory advisory fees amounting to circa USD \$50,000, operational expenses related to the token offering being around USD \$100,000, and ongoing monthly operational costs of approximately USD \$15,000.
		Operational Performance: Key milestones achieved include establishment of the corporate structure, securing technical

		development partnerships with Baton Corporation Ltd, finalizing custody arrangements with FORIS DAX MT Limited (crypto.com)., and completing preparation for the token offering in compliance with the MiCA framework. All regulatory requirements have been met on schedule, demonstrating effective project execution and risk management.  **Business Development**: The company has successfully established the necessary operational infrastructure for the PUMP token offering, including professional service provider relationships. Strategic partnerships have been secured to support the token launch, with investment in business development activities amounting to USD \$25,000.
	Part D – I	Information about the crypto-asset project
D.1	Crypto-asset project name	Pump.fun
D.2	Crypto-asset name	PUMP
D.3	Abbreviation	N/A
D.4	Crypto-asset project description	The official 'memecoin' of the Pump.Fun protocols (" <i>Protocols</i> ").
D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project	Baton Corporation, Ltd. is the development company responsible for the implementation of the token. This company is owned by Alon Cohen, Noah Tweedale, Dylan Kerler, and Liam Neilman.  The Directors of Baton Corporation, Ltd. are Alon Cohen, Noah Tweedale, and Dylan Kerler.  Baton Corporation, Ltd. is located at 82a James Carter Rd., Mildenhall, Bury St. Edmunds IP28 7DE England, Registration 14743013.
D.6	Utility Token Classification	FALSE
D.7	Key Features of Goods/Services for Utility Token Projects	Not applicable
D.8	Plans for the token	The token will operate as a 'loyalty token' in support of the pump.fun brand, and may be transferred permissionlessly by holders. The token will not have specific utility on or in relation to the Pump.Fun Protocols.
D.9	Resource Allocation	The expenses related to the offer to the public amount to approximately USD 500,000, split between development costs, payment of salaries and service fees to employees and service providers, and fees incurred through the obtainment of legal

		and regulatory advice. Such expenses will be covered with the own funds of the issuer.
D.10	Planned Use of Collected Funds or Crypto-Assets	The collected funds will be used to cover the costs incurred related to the offer to the public, and to further develop the Pump.Fun Protocols, including their functionalities and further grow the wider 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	OTPC
E.2	Reasons for Public Offer or Admission to trading	The PUMP token is being offered to the public in order to further develop the Pump.Fun Protocols and launch new products, to further grow the pump.fun ecosystem and support the community, and to raise more awareness about the pump.fun brand.
E.3	Fundraising Target	USD 20,000,000
E.4	Minimum Subscription Goals	USD 0
E.5	Maximum Subscription Goal	USD 20,000,000
E.6	Oversubscription Acceptance	FALSE
E.7	Oversubscription Allocation	FALSE
E.8	Issue Price	USD 0.004
E.9	Official currency or any other crypto- assets determining the issue price	USD
E.10	Subscription fee	USD 0
E.11	Offer Price Determination Method	Fixed Price

E.12	Total Number of Offered/Traded Crypto- Assets	5,000,000,000
E.13	Targeted Holders	ALL (both professional and retail).
E.14	Holder restrictions	There are no holder restrictions.
E.15	Reimbursement Notice	Any purchaser of the PUMP token who is an EU resident will be permitted to be reimbursed for the token purchase at any time prior to the token being admitted to trading.
E.16	Refund Mechanism	Purchasers must contact the issuer by email to initiate the refund on legal@pump.fun. Refunds will only be paid to the address which have agreed to the purchase. Only purchasers who purchased tokens directly from the issuer are eligible for refunds.
E.17	Refund Timeline	Refunds will be issued within three days of when the request is received.
E.18	Offer Phases	The offer will begin with a five day sales period. Once the sales period is over, there will be no further token sales.  Tokens are delivered immediately to users purchasers the termination of the subscription period.
E.19	Early Purchase Discount	None
E.20	Time-limited offer	TRUE
E.21	Subscription period beginning	12/07/2025
E.22	Subscription period end	17/07/2025
E.23	Safeguarding Arrangements for Offered Funds/Crypto-Assets	The crypto-assets collected from purchasers will be held in custody by FORIS DAX MT Limited (crypto.com). throughout the subscription period, in line with the policies of FORIS DAX MT Limited. The PUMP tokens will be transferred to the purchasers immediately upon the termination of the subscription period.

E.24	Payment Methods for	Payments will be accepted in USDC and USDT, with the
	Crypto-Asset	payments being made directly to a wallet the keys to which are
	Purchase	held by FORIS DAX MT Limited (crypto.com).
E.25	Value Transfer	Refunds will be issued in either USDC or USDT, depending
	Methods for	on which crypto-asset was used for the original purchase.
	Reimbursement	
E.26	Right of Withdrawal	The purchasers will have the right to withdraw from the
		purchase of the PUMP token throughout the subscription
		period. Upon the termination of the subscription period, the
		PUMP token will be transferred to purchasers immediately and
		admitted to trading, and therefore the right of withdrawal will
		no longer apply as per Article 13(4) of MiCA.
E.27	Transfer of Purchased	The purchased PUMP tokens will be transferred to the
	Crypto-Assets	purchasers upon the termination of the subscription period.
E.28	Transfer Time	Immediately upon the termination of the subscription period.
	Schedule	
E.29	Purchaser's Technical	1. A compatible digital wallet;
	Requirements	2. Internet access; and
		3. A device (computer or mobile) to manage digital
		wallet/private key.
E.30	Crypto-asset service	Not applicable
	provider (CASP)	
	name	
E.31	CASP identifier	Not applicable
E.32	Placement form	NTAV
F 22	TE 1' DI (C	NT 4 12 11
E.33	Trading Platforms	Not applicable
E 24	name Trading Platforms	Not applicable
E.34	Trading Platforms Market Identifier	Not applicable
	i ivrarker idenniner	
E 25	Code (MIC)	Not applicable
E.35	Code (MIC) Trading Platforms	Not applicable
E.35	Code (MIC)	Not applicable  Not applicable

E.37	Offer Expenses	The expenses related to the offer to the public amount to approximately USD 500,000, split between development costs, payment of salaries and service fees to employees and service providers, and fees incurred through the obtainment of legal and regulatory advice.
E.38	Conflicts of Interest	No
E.39	Applicable law	British Virgin Islands
E.40	Competent court	Commercial Court of the BVI
	Part F	- Information about the crypto-assets
F.1	Crypto-Asset Type	Crypto-asset other than an asset-referenced token or e-money token.
F.2	Crypto-Asset Functionality	The PUMP crypto-asset is a 'memecoin' that can be transferred permissionlessly between users and has no intrinsic utility or functionality. Following the initial offer to the public, its value will entirely depend on the demand and supply mechanics of the secondary market, and its value will not purport to refer to thevalue of any other currency, asset, value, or right.
F.3	Planned Application of Functionalities	The PUMP crypto-asset has no intrinsic utility or functionality, and there are no plans to confer it with any intrinsic utility or functionality.
F.4	Type of white paper	OTHR
F.5	The type of submission	NEWT
F.6	Crypto-Asset Characteristics	The PUMP crypto-asset is a 'memecoin' that can be transferred permissionlessly between users on the Solana blockchain, and has no intrinsic utility or functionality.
F.7	Commercial name or trading name	PUMP
F.8	Website of the issuer	https://pump.fun
F.9	Starting date of offer to the public or admission to trading	12/07/2025
F.10	Publication date	29/07/2025
F.11	Any other services provided by the issuer	The Issuer does not provide any other services not covered by Regulation (EU) 2023/1114.
F.12	Identifier of operator of the trading platform	Not applicable

F.13	Language or languages of the	English
	white paper	
F.14	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.15	Functionally Fungible Group Digital Token Identifier, where available	Not applicable
F.16	Voluntary data flag	FALSE
F.17	Personal data flag	TRUE
F.18	LEI eligibility	Not available
F.19	Home Member State	Malta

F.20	Host Member States	The offer to the public of the Token is passported in the
		following countries:
		Austria
		Belgium
		Bulgaria
		Croatia
		Cyprus
		Czech Republic
		Germany
		Denmark
		Estonia
		Finland
		France
		Greece
		Hungary
		Ireland
		Iceland
		Italy
		Liechtenstein
		Lithuania
		Luxembourg
		Latvia
		Netherlands
		Norway
		Poland
		Portugal
		Romania
		Slovenia
		Slovakia
		Spain
		Sweden
J	Part G – Information of	n the rights and obligations attached to the crypto-assets
G.1	Purchaser Rights and	The purchaser can freely transfer, trade, and exchange the
	Obligations	crypto-asset. The purchaser will have the right of rescission of
		the purchase until the crypto-asset is admitted to trading, which
		is set to take place upon the termination of the subscription
		period.
G.2	Exercise of Rights	The token may be transferred using the Solana public
	and obligations	blockchain. The right of rescission may be exercised by
		requesting a rescission through email to legal@pump.fun
G.3	Conditions for	The right of rescission will be terminated once the token is
	modifications of	trading on the secondary market.
G .	rights and obligations	
G.4	Future Public Offers	None are planned currently.

G.5	Issuer Retained	750,000,000 (15% of total token supply).
0.5		750,000,000 (15% of total token supply).
G.6	Crypto-Assets Utility Token	FALSE
G.0	Classification	FALSE
G.7	Key Features of	Not applicable
G.7	Goods/Services of	Not applicable
	Utility Tokens	
G.8	Utility Tokens	No redemption
0.6	Redemption	No reachiption
G.9	Non-Trading request	TRUE
0.7	Tron-Trading request	IKCL
G.10	Crypto-Assets	Not applicable
	purchase or sale	
	modalities	
G.11	Crypto-Assets	There will be no transfer restrictions on the PUMP token once
	Transfer Restrictions	it is delivered to the purchasers, and generally the PUMP token
		is freely transferable among holders, subject to any transfer
		restrictions imposed by third parties such as CASPs.
G.12	Supply Adjustment	The PUMP token will have a fixed supply.
	Protocols	
G.13	Supply Adjustment	Not applicable
	Mechanisms	
G.14	Token Value	Not applicable
	Protection Schemes	
G.15	Token Value	FALSE
	Protection Schemes	
0.16	Description	DAT OF
G.16	Compensation	FALSE
	Schemes	
G.17	Compensation	Not applicable
	Schemes Description	
G.18	Applicable law	British Virgin Islands
G.19	Competent court	Commercial Court of the BVI
3.17	<u> </u>	Information on the underlying technology
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H.1	Distributed ledger technology	The Token will be launched on the Solana blockchain.
H.2	Protocols and	The SPL token standard.
	technical standards	
H.3	Technology Used	PUMP operates on the Solana blockchain, a high-performance,
		energy-efficient network utilizing Proof-of-Stake consensus
		combined with innovative Proof-of-History (PoH) technology
		that provides cryptographic timestamps enabling parallel
		transaction processing. Solana's architecture supports over

H.4	Consensus Mechanism  Incentive Mechanisms and Applicable Fees	50,000 transactions per second with 400-millisecond block times while consuming only 8.755 GWh annually (equivalent to 833 US homes), making it 99.9945% more energy-efficient than Bitcoin. PUMP utilizes the SPL (Solana Program Library) token standard, the most widely adopted and battle-tested token framework on Solana, ensuring compatibility across the ecosystem's thousands of applications. The network is secured by approximately 1,900-2,000 globally distributed validators who stake SOL tokens as economic collateral, with transaction fees typically costing \$0.005-\$0.02 and practical finality achieved in 12.8 seconds.  The Token will be launched on the Solana blockchain, which relies on a Proof of Stake ("PoS") consensus mechanism. In Solana's PoS consensus mechanism, validators are randomly selected to propose and attest to blocks. To participate as a Solana validator, they must run dedicated hardware as per the recommended minimum requirements (https://docs.anza.xyz/operations/requirements) and run the software established for that end.  Validators are compensated with SOL in exchange for proposing and attest on proposed blocks. Their compensation is sourced from a portion of transaction fees and a block reward. If validators misbehave, they will be penalized with slashing, involving losing part of their staked SOL. Every Solana transaction requires the payment of base fees. Half of the base fee gets burned, while half is paid to the
Н.6	Use of Distributed Ledger Technology	validator that processed the transaction.  FALSE
H.7	DLT Functionality Description	Not applicable
H.8	Audit	FALSE
H.9	Audit outcome	Not applicable
Part		sustainability indicators in relation to the adverse impact on other environment-related adverse impacts
J.01	Name	Golden Fields Partners Limited, as the offeror of the PUMP token, is submitting the information on the sustainability indicators.
J.02	Relevant legal entity identifier	2158899

J.03	Name of the crypto- asset	PUMP
J.04	Consensus Mechanism	The Token will be launched on the Solana blockchain, which relies on a PoS consensus mechanism. In Solana's PoS consensus mechanism, validators are randomly selected to propose and attest to blocks. To participate as a Solana validator, they must run dedicated hardware as per the recommended minimum requirements (https://docs.anza.xyz/operations/requirements) and run the software established for that end.
J.05	Incentive Mechanisms and Applicable Fees	Validators are compensated with SOL in exchange for proposing and attest on proposed blocks. Their compensation is sourced from a portion of transaction fees and a block reward. If validators misbehave, they will be penalized with slashing, involving losing part of their staked SOL. Every Solana transaction requires the payment of base fees. Half of the base fee gets burned, while half is paid to the validator that processed the transaction.
J.06	Beginning of the Period to which the Disclosed Information Relates	10/06/2025
J.07	End of the Period to which the Disclosed Information Relates	10/06/2026
J.08	Energy Consumption	Based on the Solana Foundation Energy Use Report (September 2024), the Solana network's annual energy consumption is projected at 8,755,235.20 kWh (8.755 GWh) for 2024. The network consumption represents approximately 833 American homes' annual electricity usage. PUMP's proportional energy consumption, calculated based on expected transaction volume relative to total Solana network activity, is estimated at 200-800 kWh annually, representing 0.002-0.009% of total network consumption.
J.09	Energy Consumption Sources and Methodologies	Primary Data Sources: This assessment utilizes the Solana Foundation's official Energy Use Report (September 2024) maintained by the Crypto Carbon Ratings Institute (CCRI) via climate.solana.com as the authoritative source for all network- level metrics.
		Network Energy Profile: 2024 Total Consumption: 8,755,235.20 kWh (8.755 GWh) Per Transaction Efficiency: 0.00412 watt hours (Wh) average Transaction Capacity: 50,000+ transactions per second

*Validator Count*: Approximately 1,900-2,000 validators globally

Hardware Requirements: 12+ cores, 128GB+ RAM, 1TB+

NVMe storage per validator

## **Carbon Footprint Analysis:**

**2024** Network Emissions: 2,671 tonnes CO2 equivalent **2023** Baseline: 8,786 tonnes CO2 equivalent (69% reduction achieved)

*Comparative Context*: Equivalent to 167 Americans' annual carbon production (16 tonnes CO2/person/year)

#### **PUMP Token Allocation:**

*Calculation Method*: (PUMP foreseen transaction volume / Total Solana transaction volume) × Total network metrics *Annual Energy Allocation*: 200-800 kWh (0.002-0.009% of network total)

*Carbon Footprint*: 0.061-0.244 tonnes CO2 equivalent *Per Transaction*: 0.00412 Wh (same as network average)

#### **Methodology and Technology:**

Solana's energy efficiency derives from Proof-of-Stake consensus combined with Proof-of-History cryptographic timestamps, enabling parallel transaction processing and eliminating energy-intensive mining. The network achieves 400-millisecond block times and processes multiple transactions simultaneously through its Sealevel runtime.

#### **Data Verification**:

Real-time environmental metrics available via <u>climate.solana.com</u> dashboard, updated for MiCA regulatory compliance. Carbon footprint reductions achieved through verified offset programs including carbon credits and biodiversity preservation initiatives.

#### **Measurement Limitations:**

Energy consumption based on estimated validator hardware specifications and global distribution. Carbon intensity calculated using regional grid averages. Future efficiency improvements from hardware optimization and renewable energy adoption not projected in current estimates.