MetaBlox Technologies inc. MiCAR White Paper

IN ACCORDANCE WITH

TITLE II OF REGULATION (EU) 2023/1114

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01. Date of Notification: 2025-11-10

Regulatory Disclosures

02. Statement in accordance with Article 6(3) of Regulation (EU) 2023/1114:

This crypto-asset white paper has not been approved by any competent authority in any Member State of the European Union. The person seeking admission to trading of the crypto-asset is solely responsible for the content of this crypto-asset white paper.

03. Compliance statement in accordance with Article 6(6) of Regulation (EU) 2023/1114

This crypto-asset white paper complies with Title II of Regulation (EU) 2023/1114 and, to the best of the knowledge of the management body of MetaBlox Technologies inc., the information presented in the crypto-asset white paper is fair, clear and not misleading and the crypto-asset white paper makes no omission likely to affect its import.

04. Statement in accordance with Article 6(5), points (a), (b), (c):

The crypto-asset referred to in this white paper may lose its value in part or in full, may not always be transferable and may not be liquid.

05. Statement in accordance with Article 6(5), point (d):

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

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

The crypto-asset referred to in this white paper is not covered by the investor compensation schemes under Directive 97/9/EC of the European Parliament and of the Council. The crypto-asset referred to in this white paper is not covered by the deposit guarantee schemes under Directive 2014/49/EU of the European Parliament and of the Council.

Summary

07. Warning:

This summary should be read as an introduction to the crypto-asset white paper. The prospective holder should base any decision to purchase this crypto-asset on the content of the crypto-asset white paper as a whole and not on the summary alone. The offer to the public of this crypto-asset does not constitute an offer or solicitation to purchase financial instruments and any such offer or solicitation can be made only by means of a prospectus or other offer documents pursuant to the applicable national law. This crypto-asset white paper does not constitute a prospectus as referred to in Regulation (EU) 2017/1129 of the European Parliament and of the Council (36) or any other offer document pursuant to Union or national law.

08. Characteristics of the Crypto-Asset The ROAM token is a multi-utility token used within the Roam decentralized wireless network. Holding ROAM grants functional rights such as participating in community governance, staking to earn yield, and accessing services like global eSIM data. The token does not confer any ownership, profit rights, or legal claims against the issuer, and holders have no specific contractual obligations. These rights are exercised primarily by staking ROAM tokens through the protocol's on-chain functionalities. The rights and obligations associated with the token may be modified through changes to the protocol rules. Following the implementation of a planned on-chain governance model (DAO), token holders will be able to propose and vote on these changes, with voting power proportional to their staked tokens.

09. Utility Token Summary The $ROAM token is a multi-utility token that provides access to goods and services within the Roam decentralized global wireless network. Its primary functionalities include: (i) Community Governance: Holders can stake $ROAM to vote on network proposals through a DAO structure. (ii) Staking for Rewards: Users can stake the token to generate yield and access ecosystem benefits, such as receiving monthly global eSIM data. (iii) Network Operations: Validators, RADIUS operators, and mining device manufacturers must stake $ROAM to secure operational rights. (iv) Access to Services: The token can be converted into Roam Points, which are used to redeem services like in-app games, access privacy-preserving data, and purchase applications within the ecosystem. Transferability of the $ROAM token is subject to restrictions. Tokens allocated to the team and from initial sales are subject to vesting programs that limit their immediate transferability. Additionally, the token contract includes a 'Freeze Authority,' which enables the imposition of account-level token transfer restrictions, although this is managed through a multi-signature mechanism.

10. Key Information About the Admission to Trading No public offer of ROAM tokens is being made in connection with this disclosure. The token is already issued and circulating, and this document is not associated with any new fundraising activity. As a result, there is no subscription period, issue price, or subscription fees applicable. No crypto-asset service provider has been appointed to place the token. Admission to

trading for the ROAM token is being sought on the Kraken trading platform to enhance accessibility and improve liquidity.

A. Information about the Person Seeking Admission to Trading

A.1 Name: MetaBlox Technologies inc.

A.2 Legal Form: N/A

A.3 Registered address: Advanced Tower Building, First Floor, RicardoArias Street, Panama City, Panama.

A.4 Head office: Advanced Tower Building, First Floor, RicardoArias Street, Panama City, Panama, 0801

A.5 Registration Date: 2021-12-10

A.6 Legal entity identifier: 98450045744C61C7C356

A.7 Another identifier required pursuant to applicable national law: 155716128

A.8 Contact telephone number: +17787611314

A.9 E-mail address: info@weroam.xyz

A.10 Response Time (Days): 1

A.11 Parent Company: MetaBlox Foundation

A.12 Members of the Management body:

Name	Business Function	Business Address
Iramirus Esther MC Lean Del CID	President	Advanced Tower Building, First Floor, RicardoArias Street, Panama City
Veronica Camano	Secretary	Advanced Tower Building, First Floor, RicardoArias Street, Panama City
Maria Elena Mata Donado De Toral	Treasurer	Advanced Tower Building, First Floor, RicardoArias Street, Panama City

A.13 Business Activity:

Roam is building a decentralized telecommunications ecosystem that connects global users through WiFi, eSIM, and location-based services powered by blockchain. By aligning user incentives with network participation, Roam delivers scalable, low-cost, and transparent connectivity infrastructure under the DePIN model (Decentralized Physical Infrastructure Network).

Core Aspects:
eSIM & Data Services – Global data packages sold via the Roam App, with revenue from retail margins, enterprise plans, and premium subscriptions.
WiFi & Miner Network – Businesses and users deploy Roam Miners to share connectivity and earn rewards; Roam earns from partnerships and data insights.
Partner Campaigns – Discovery Events and brand engagements within the app generate marketing revenue and token utility.

Value & Token Utility
The $ROAM token powers all ecosystem functions:
Used for eSIM payments, staking, and rewards.
Incentivizes miners, users, and validators.
Supports governance and protocol fee redistribution.

Sustainability
Roam minimizes traditional telecom costs by leveraging community infrastructure and blockchain coordination. This model enables rapid global expansion while maintaining transparency, efficiency, and long-term token value alignment.

A.14 Parent Company Business Activity: The primary business activity is the development and operation of Roam, an open-access global wireless network designed to provide automated, seamless, and secure connectivity for individuals and smart devices. The network is built on a decentralized physical infrastructure (DePIN) model, leveraging blockchain-based credentials, OpenRoaming WiFi, and a smart global eSIM service. The principal activities encompass several areas:

1. Telecommunication Services: Offering global eSIM products with data plans that are usable across more than 160 countries, providing a cost-effective alternative to traditional roaming fees.
2. Network Node and Infrastructure Services: This includes the sale of hardware miners, collection of network activation fees, and the provision of node-based services such as distributed Content Delivery Networks (CDN) and IP-based services to industries like e-commerce, social media, and AI.
3. User-Based Monetization: Leveraging the network's extensive user base through WiFi advertisements, partnerships with GameFi producers, in-app advertising, and providing access to privacy-preserving, location-based data. The principal markets are global. The wireless network has an established presence with nodes in over 200 countries and districts, positioning its services for a worldwide user and enterprise customer base.

A.15 Newly Established: true

A.16 Financial condition for the past three years:

The Issuer was registered in December 2021. Since its inception, the company's financial condition has been characteristic of a development-stage enterprise, focusing on growth and product development prior to generating revenue. As of the end of the 2021 fiscal period (December 31, 2021), the company reported total assets of US$284,460, primarily consisting of cash. Liabilities stood at US$293,000, mainly from unearned revenue, resulting in an initial shareholder deficit of US$8,540 following a net loss of US$8,550 for the period. Throughout 2022, the company's financial position expanded significantly. Total assets grew to US$1,083,183, with a corresponding increase in liabilities to US$2,688,085, driven by a substantial rise in unearned revenue to US$2,662,000. The company incurred a net loss of US$1,596,352, primarily due to sub-contracting expenses, which increased the shareholder deficit to US$1,604,902. In 2023, total assets decreased to US$217,428, while liabilities continued to grow to US$3,164,603, with unearned revenue reaching US$2,862,000. The net loss for the year was US$1,342,283, further increasing the retained earnings deficit to US$2,947,185. By the end of 2024, the company's asset base recovered to US$1,368,113, entirely in cash and deposits. Liabilities saw a significant increase to US$7,419,301, with unearned revenue comprising US$7,272,000 of this total. The net loss for 2024 was US$3,104,013, contributing to a total shareholder deficit of US$6,051,188. In summary, since registration, the Issuer has not generated revenue. Its operations have been financed through capital injections reflected as unearned revenue. The consistent net losses are attributable to significant investments in development, particularly sub-contracting costs, leading to a progressively increasing shareholder deficit.

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: different

B.2 Name: MetaBlox Foundation

B.3 Legal Form: N/A

B.4 Registered address: N/A

B.5 Head office: N/A

B.6 Registration Date: 2021-12-10

B.7 Legal entity identifier: 984500VD1K371FCFDC37

B.8 Another identifier required pursuant to applicable national law: 25047406

B.9 Parent Company: N/A

B.10 Members of the Management Body:

Name	Business Function	Business Address
Iramirus Esther MC Lean Del CID	President	Advanced Tower Building, First Floor, RicardoArias Street, Panama City
Veronica Camano	Secretary	Advanced Tower Building, First Floor, RicardoArias Street, Panama City
Maria Elena Mata Donado De Toral	Treasurer	Advanced Tower Building, First Floor, RicardoArias Street, Panama City

B.11 Business Activity: Token Issuance and Governance for MetaBlox technologies.

B.12 Parent Company Business Activity: N/A

C. Information about the operator of the trading platform in cases where it draws up the crypto-asset white paper and information about other persons drawing the crypto-asset white paper pursuant to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114

C.1 Name: N/A, This section is not applicable, as neither the operator of a trading platform nor any other person, apart from the issuer, has drawn up or contributed to the preparation of the crypto-asset white paper.

C.2 Legal Form: N/A

C.3 Registered address: N/A

C.4 Head office: N/A

C.5 Registration Date: N/A

C.6 Legal entity identifier of the operator of the trading platform: N/A

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

C.8 Parent Company: N/A

C.9 Reason for Crypto-Asset White Paper Preparation: N/A

C.10 Members of the Management body: N/A

C.11 Operator Business Activity: N/A

C.12 Parent Company Business Activity: N/A

C.13 Other persons drawing up the crypto- asset white paper according to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114: N/A

C.14 Reason for drawing the white paper by persons referred to in Article 6(1), second subparagraph, of Regulation (EU) 2023/1114: N/A

D. Information about the Crypto-Asset Project

D.1 Crypto-asset project name: Roam

D.2 Crypto-assets name: ROAM

D.3 Abbreviation: $ROAM

D.4 Crypto-asset project description: Roam is a pioneering protocol developed to create a decentralized, open-access global WiFi OpenRoaming network. It empowers users to seamlessly traverse public WiFi networks using their decentralized identifiers (DIDs) and corresponding verifiable credentials (VCs), establishing a unified global network that interlinks distinct WiFi systems. This approach eliminates the need for repeated log-ins, password sharing, and redundant registrations. By leveraging a blockchain-based credential infrastructure, Roam aims to become a Web3 telco powered by OpenRoaming WiFi and a smart global eSIM. The project is designed to accelerate the growth of existing OpenRoaming networks, facilitate the global 5G rollout, and provide a secure, user-centric wireless access framework where data privacy is protected.

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

Name	Business Function	Business Address
Maria Elena Mata Donado De Toral	Founder	Advanced Tower Building, First Floor, RicardoArias Street, Panama City
Iramirus Esther MC Lean Del CID	Secretary	Advanced Tower Building, First Floor, RicardoArias Street, Panama City
Veronica Camano	Treasurer	Advanced Tower Building, First Floor, RicardoArias Street, Panama City

D.6 Utility Token Classification: true

D.7 Key Features of Goods/Services for Utility Token Projects: Roam is developing a decentralized global wireless network that integrates OpenRoaming WiFi and eSIM technologies, powered by a blockchain-based credential infrastructure. The ecosystem offers a suite of products and services designed to provide secure, seamless, and open-access connectivity worldwide. Key goods and services include:

1. Roam Decentralized Wireless Network: A global network that integrates WiFi and eSIM technologies. Its infrastructure is composed of dedicated hardware miners,

community-contributed nodes, an eSIM control platform, and a distributed backend supported by community validators. The network is designed not only for connectivity but also to serve as an AI data infrastructure.

2. Mobile Application: A user-facing application that provides open wireless access, connecting a global community of users across more than 200 countries and regions.
3. Hardware Miners: A series of hardware devices that function as WiFi routers, OpenRoaming nodes, and distributed Content Delivery Network (CDN) nodes. These devices form the backbone of the decentralized physical infrastructure.
4. Global Smart eSIM: A single eSIM that provides data connectivity in over 160 countries. It operates on a pay-as-you-go model with data that does not expire, offering significant savings on traditional roaming costs.
5. Premium eSIM: An enhanced version of the Global eSIM that includes voice and SMS services in addition to data connectivity across more than 160 countries.

D.8 Plans for the token:

Milestones:

- 2022: Successfully closed a $2.86 million seed funding round and launched the MetaBlox Genesis NFT.
- 2023: Shipped the first miner hardware, released the mobile app on the App Store and Google Play, and reached 100,000 users. Secured an additional $5.39 million in an angel funding round.
- 2024: Rebranded from MetaBlox to Roam, migrated the network to the Solana Mainnet, surpassed 1 million registered users and nodes, and launched Roam eSIM functionality.
- Q1 2025: Launched the Discovery Ecosystem and burning mechanism, got listed on nine major exchanges including Bybit, Bitget, and introduced staking and lock-up features.
- Q2 2025: Introduced the Premium eSIM, expanded to the BNB chain via Wormhole, and launched liquidity pools on Meteora and Pancake Swap.

Future Plans (Next Half Year):

- Roam App 2.0: Release a major upgrade to the Roam app, offering an enhanced experience with daily check-ins and network interactions that unlock rewards and services.
- Community DAO Governance: Launch a decentralized governance model that empowers users to actively shape the future of the network through collective decision-making.
- Roam OS: Transform WiFi routers into smart hubs with OpenRoaming connectivity and app store capabilities.
- Next-Gen WiFi Miners: Introduce a diverse lineup of advanced miners, including certified third-party devices, to deliver enhanced features for a superior network experience.

- Fully Converged Wireless Network: Integrate WiFi and cellular for uninterrupted, decentralized connectivity with seamless authentication across both systems.

Long-Term Development:

- Decentralized Edge Computing: Expand beyond wireless access to provide a decentralized edge computing network, offering storage and computing functions to support AI applications and incubate other DePIN projects.
- Roam Protocol Expansion: Further develop the Roam protocol to support new applications, including on-chain KYC systems, crypto payment gateways, and DID-based credit rating systems.
- Industry Collaboration: Continue to work with industry partners like the WBA and WiFi Alliance to accelerate the adoption of OpenRoaming and related technologies like EAP-TEAP and EAP-DID for improved privacy and security.

D.9 Resource Allocation: The project has secured significant financial resources through several funding rounds, raising a total of approximately US$9.28 million to support its development and growth. This funding was acquired through a Seed Round (US$300,000), an Angel Round (US$2.86 million), and a Series A Round (US$6.12 million). These financial resources are strategically allocated to advance the project's core objectives. As of the end of 2024, approximately US$6.05 million has been deployed, primarily towards sub-contracts and professional fees. This investment covers crucial areas such as the development of the decentralized wireless network, the creation and enhancement of the mobile application, the production of hardware miners, and the integration of eSIM technology. Furthermore, the project benefits from strategic backing from prominent investors including Samsung Next, Solana, Anagram, and Volt Capital, which provides critical support for infrastructure scaling and ecosystem expansion, reinforcing the project's commitment to sustained, innovation-driven growth.

D.10 Planned Use of Collected Funds or Crypto-Assets: The $ROAM token is already in circulation and is not part of a new or ongoing fundraising event. For the avoidance of doubt, any sale or distribution of tokens is performed solely for the purpose of obtaining project development funds, raising market and brand awareness, and fostering community building and social engagement. Within the operational context of the Roam ecosystem, collected funds and crypto-assets are allocated to support the project's long-term vision and growth, with planned uses including:

1. Network Development and Infrastructure: A significant portion of resources is dedicated to the continuous development, maintenance, and expansion of the Roam decentralized wireless network. This includes enhancing the functionality of the Roam mobile application, developing next-generation WiFi miners and hardware, and scaling the backend infrastructure, such as the distributed RADIUS service, to support a growing user base.
2. Ecosystem and Community Growth: Funds are utilized to fuel network adoption and user acquisition. This includes marketing initiatives, strategic partnerships, and community-building activities. Resources are also allocated to the token

incentive model, such as mining and staking rewards, which encourages participation and network expansion.

3. Research and Innovation: Allocations are made for research into future technologies and standards, such as EAP-TEAP adoption, decentralized identity (DID/VC) integration, and the development of a converged WiFi and cellular network. This ensures the Roam network remains at the forefront of the DePIN sector.
4. Operational Costs: A portion of the funds is used for general and administrative expenses necessary for the day-to-day operations of the project. This includes staffing, third-party services, and other operational overhead.
5. Legal and Regulatory Compliance: Funds are reserved to ensure ongoing compliance with legal and regulatory requirements across various jurisdictions, safeguarding the network and its participants. As no specific fundraising initiative is currently underway, the uses described above represent general operational and strategic priorities rather than pre-allocated budget categories from a specific token sale.

E. Information about the Admission to Trading

E.1 Public Offering or Admission to trading: ATTR

E.2 Reasons for Public Offer or Admission to trading: The admission to trading of the $ROAM token is driven by several key objectives aimed at fostering the growth and utility of the Roam network. Primarily, it seeks to enhance the accessibility of the token to a broader user base, thereby improving its liquidity on secondary markets. This increased availability is expected to lead to more efficient price discovery and reliable trade execution for participants, further enabling the vision of a global, open-access OpenRoaming WiFi network. Central to this initiative is the use of the $ROAM token as an essential economic incentive for bootstrapping and expanding the Roam decentralized physical infrastructure network (DePIN). It motivates individuals and businesses to act as miners, validators, and other contributors, providing critical WiFi services, expanding network coverage, and ensuring network quality. Funds generated from initial token sales and network activation fees are earmarked for vital project development, raising market and brand awareness, and fostering continuous community building and social engagement. Furthermore, $ROAM is designed as a multi-utility token to accrue network value, enabling community governance, offering staking opportunities for yield generation, providing access to Roam's global eSIM data, and facilitating participation in various ecosystem programs. The public offering and admission to trading are intended to ensure a transparent, compliant, and robust environment for its token holders, reinforcing the project's commitment to high disclosure standards and encouraging widespread adoption of its Web3 telecommunications model.

E.3 Fundraising Target: N/A

E.4 Minimum Subscription Goals: N/A

E.5 Maximum Subscription Goal: N/A

E.6 Oversubscription Acceptance: N/A

E.7 Oversubscription Allocation: N/A

E.8 Issue Price: N/A

E.9 Official currency or any other crypto- assets determining the issue price: N/A

E.10 Subscription fee: N/A

E.11 Offer Price Determination Method: N/A

E.12 Total Number of Offered/Traded Crypto- Assets: 1000000000

E.13 Targeted Holders: ALL

E.14 Holder restrictions: 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: $ROAM can be purchased using widely accepted cryptocurrencies such as USDT, USDC, and ETH. Depending on the platform or launch method, on-ramp payments via fiat (via integrated partners) may also be supported.

E.25 Value Transfer Methods for Reimbursement: N/A

E.26 Right of Withdrawal: N/A

E.27 Transfer of Purchased Crypto-Assets: Users can withdraw it to their wallets via normal blockchain activity.

E.28 Transfer Time Schedule: N/A

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

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

E.31 CASP identifier: N/A

E.32 Placement form: N/A

E.33 Trading Platforms name: Kraken.

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

E.35 Trading Platforms Access: Investors can access $ROAM through its official trading platforms by visiting their respective websites or mobile applications. Access generally requires completing the necessary registration and Know Your Customer (KYC) procedures in accordance with each platform’s compliance policies. The $ROAM token operates on both the Solana and BNB Chain (BSC) networks.

E.36 Involved costs: The Roam network does not operate any trading platforms for $ROAM tokens. Any secondary markets or exchanges for trading $ROAM would be run and operated wholly independently of the Company, the Distributor, the distribution of

$ROAM, and the Roam network. Neither the Company nor the Distributor will create such secondary markets nor act as an exchange for $ROAM. Therefore, any costs involved for investors in accessing such third-party trading platforms would be determined by the respective platforms and are not controlled, influenced, or governed by the Roam.

E.37 Offer Expenses: N/A

E.38 Conflicts of Interest: Potential conflicts of interest have been identified primarily in relation to the administrator privileges for the $ROAM token, specifically concerning Mint, Freeze, and Update Authorities. These centralized controls, if misused by the persons holding these permissions, could pose risks to the ecosystem. The project team acknowledges these risks and has implemented a multi-signature mechanism to mitigate them. Furthermore, the nominee directors of MetaBlox Foundation have explicitly stated that they serve purely as nominees, holding no direct or indirect beneficial interest in the Foundation, and operate strictly under instruction, thereby addressing potential conflicts in their roles.

E.39 Applicable law: Panama

E.40 Competent court: Panama

F. Information about the Crypto-Assets

F.1 Crypto-Asset Type: ROAM tokens are considered as crypto-assets other than EMTs and ARTs under Regulation (EU) 2023/1114. ROAM tokens are fungible utility tokens.

F.2 Crypto-Asset Functionality: The Roam network utilizes a dual-token model, consisting of Roam Points and the native protocol token, $ROAM. $ROAM is a functional multi-utility token designed to incentivize contribution and participation within the ecosystem.
The primary functionalities of the $ROAM token include:
a) Staking for Network Operations: Validators, witnesses, RADIUS operators, and mining device manufacturers are required to stake $ROAM tokens to secure operational rights, demonstrate commitment, and ensure service standards. In return for their services, these participants can earn $ROAM rewards.
b) Yield Generation: Users, particularly miner holders, can stake $ROAM to generate additional yield, boosting their overall rewards.
c) Community Governance: $ROAM token holders are granted the right to participate in the network's governance by staking their tokens to vote in community elections and shape the project's direction through a DAO structure.
d) Access to Services and Privileges: Users can stake or lock $ROAM tokens to access various ecosystem benefits, such as receiving monthly global eSIM data, gaining priority access to partner project campaigns and airdrops, and participating in the Roam Discovery Program.
e) Ecosystem Convertibility: $ROAM serves as the value accrual token and can be converted into Roam Points. Roam Points are generated through network contributions (mining) and are consumed within the ecosystem for services like in-app games or accessing network data.

F.3 Planned Application of Functionalities: The Roam network and its associated crypto-assets, $ROAM tokens and Roam Points, currently have a substantial range of functionalities already in application, with several additional advancements planned for the near future. These functionalities are progressively being activated through protocol upgrades and ongoing development.
Currently operational functionalities include:

- A global OpenRoaming WiFi network, utilizing Decentralized Identifiers (DIDs) and Verifiable Credentials (VCs) for automated, seamless, and secure authentication.
- The Roam mobile application, providing users with open wireless access across over 200 countries and regions.
- MetaBlox miners acting as WiFi routers, OpenRoaming nodes, and distributed Content Delivery Network (CDN) nodes.
- Roam Global Smart eSIM and Premium eSIM products, offering data, voice, and SMS services in over 160 countries, supported by Roam's WiFi OpenRoaming IDP root certificate and eSIM GSMA SM certification.

- The generation of Roam Points through mining activities, which serve as an internal settlement mechanism.
- A burning mechanism allowing Roam Points to be converted into $ROAM tokens, and a reversal burning mechanism for converting $ROAM tokens back to Roam Points.
- Staking and lock-up pool features within the app, enabling $ROAM holders to generate yield and receive global eSIM data.
- $ROAM's utility in supporting community governance (with a DAO structure planned for launch post-TGE), serving as a staking mechanism for validators, witnesses, RADIUS operators, and mining device manufacturers, and providing access to community privileges.

Planned functionalities and future developments for the next half-year and beyond include:

- A major upgrade to the Roam App (version 2.0) for an enhanced user experience, daily check-ins, and reward unlocking.
- The launch of a formal Community DAO Governance model, empowering Roamers in network decision-making.
- The introduction of the Roam Innovator Hub, a platform to support developers and creators.
- Development of Roam OS, transforming WiFi routers into smart hubs with OpenRoaming connectivity and app store capabilities.
- A new lineup of Next-Gen WiFi Miners, including certified third-party devices and community-driven OpenRoaming Miners.
- The establishment of a fully converged wireless network, integrating WiFi and cellular technologies for seamless, decentralized connectivity.
- Continued efforts to accelerate OpenRoaming adoption through greater EAP-TEAP adoption, a standardized SDK for ID providers, research into IEEE802.11bi activities for privacy protection, and a proposal for EAP-DID with the Internet Engineering Task Force (IETF).
- Expansion into decentralized edge computing networks and incubation of other DePIN projects, leveraging Roam miners.
- Further development of the Roam protocol to support new applications such as an on-chain Know Your Customer (KYC) system for Decentralized Finance (DeFi) activities, crypto payment gateways, and DID-based credit rating systems.

It is important to note that all future development goals and product timings are conceptual and subject to change at the sole discretion of the Company or its affiliates.

F.4 Type of white paper: OTHR

F.5 The type of submission: NEWT

F.6 Crypto-Asset Characteristics: The native cryptographically-secure fungible protocol token of the Roam network is the $ROAM token. It is classified as a "crypto-asset other than asset-referenced tokens or e-money tokens" under MiCAR, functioning as a multi-utility token for governance and yield within the Roam ecosystem. $ROAM is a transferable token available on the Solana and BNB Chain blockchains. The network utilizes a dual-token model, where $ROAM serves as the primary token, complemented by Roam Points which function as an internal utility token for rewards and services. The primary utility of $ROAM includes community governance through voting, staking to generate yield, and staking to receive global eSIM data. The token is designed solely as an interoperable utility token to provide economic incentives that encourage users to contribute to and participate in the Roam network. $ROAM does not represent any shareholding, ownership, right, title, or interest in the company or its affiliates. It does not entitle holders to any promise of fees, dividends, revenue, profits, or investment returns and is not intended to constitute a security.

F.7 Commercial name or trading name: Roam

F.8 Website of the issuer: https://weroam.xyz/

F.9 Starting date of offer to the public or admission to trading: 2025-12-08

F.10 Publication date: 2025-12-08

F.11 Any other services provided by the issuer: The issuer, MetaBlox Technologies Inc. (operating as Roam), provides a range of services that extend beyond the issuance and management of its crypto-assets and the core OpenRoaming WiFi network. These services are not covered by the MiCAR Regulation and include:

1. Telecommunications Services: Offering global eSIM products with data plans usable across multiple countries, generating revenue through usage fees.
2. Hardware Sales: The sale of physical MetaBlox miners, which serve as WiFi routers, OpenRoaming nodes, and distributed CDN nodes.
3. Distributed Content Delivery Network (CDN) Services: Providing CDN services to third-party platforms such as eCommerce, social media networks, and video applications.
4. IP-based Services: Offering IP addresses for various industry applications, including VPNs, eCommerce, and AI.
5. Edge Computing and Rendering Services: Leveraging the network's mining devices to provide edge computing and rendering functionalities.
6. Advertising and Monetization Services: Facilitating WiFi advertisements, in-app ads, and location-based monetization for Web2 business models.
7. GameFi Integration Partnerships: Collaborating with third-party game producers, including profit-sharing agreements.
8. Smart Home Solutions and Application Distribution: Exploring additional revenue opportunities through smart home solutions and application distribution.

The provided documentation does not explicitly refer to specific legal acts applicable to these services.

F.12 Language or languages of the white paper: English

F.13 Digital Token Identifier Code used to uniquely identify the crypto-asset or each of the several crypto assets to which the white paper relates, where available: N/A

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

F.15 Voluntary data flag: false

F.16 Personal data flag: false

F.17 LEI eligibility: true

F.18 Home Member State: IE

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

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

G.1 Purchaser Rights and Obligations: The native token of the Roam network, $ROAM, is a functional multi-utility token designed solely for use within the ecosystem. Ownership of $ROAM does not represent any shareholding, participation, right, title, or interest in the Company, the Distributor, or any affiliated entities. Token holders are not entitled to any promise of fees, dividends, revenue, profits, or investment returns, and the token is not intended to constitute a security.
The rights associated with holding $ROAM are purely functional and limited to its utility within the Roam network. These utilities include:

- Community Governance: Token holders can stake $ROAM to vote on community proposals and participate in elections through the DAO structure.
- Staking for Yield: Users can stake their $ROAM tokens to generate yield, which is paid out in additional $ROAM.
- Operational Staking: Network participants, such as Validators, RADIUS operators, and mining device manufacturers, are required to stake $ROAM as a commitment to ensure service standards and to gain the right to operate within the network.
- Access to Services: Holders can stake $ROAM to receive benefits, including global eSIM data, and gain priority access to ecosystem campaigns and airdrops.
  There are no specific contractual obligations imposed on purchasers or holders of the $ROAM token.

G.2 Exercise of Rights and obligations: The $ROAM token is a functional multi-utility token, and its ownership carries the right to use it for interaction within the Roam network. The primary procedure for exercising rights and participating in the ecosystem is through staking. The specific rights and their conditions for exercise are as follows:

- Governance Rights: Token holders can participate in community elections by staking their $ROAM tokens. The number of voting tickets granted is proportional to the amount of tokens staked, allowing holders to influence the network's direction.
- Network Operation Rights: To ensure service standards and commitment, certain network participants are required to stake $ROAM. This includes Validators and witnesses who stake for the right to validate services, as well as RADIUS operators and mining device manufacturers who stake for the right to operate within the ecosystem. In return for their services, these participants are eligible to earn token rewards.
- Access to Privileges: Community members can stake $ROAM tokens to gain access to other privileges, such as priority access to campaigns and airdrops from ecosystem partners.

Essentially, the use and utility of the $ROAM token are executed directly through the protocol's staking functionalities, which are managed by on-chain smart contracts.

G.3 Conditions for modifications of rights and obligations: Modifications to the rights and obligations associated with the $ROAM token primarily relate to changes in the protocol rules of the Roam network. A formal on-chain governance model is planned to be implemented within the first year following the Token Generation Event (TGE). Under this future Decentralized Autonomous Organization (DAO) structure, $ROAM token holders will have the right to propose and vote on changes to the network. The voting power will be proportional to the amount of $ROAM tokens a user stakes. This mechanism will cover modifications to key network parameters and functionalities.

Prior to the full implementation of the DAO, major strategic decisions are made by the core leadership team in consultation with key investors. During this phase, the project maintains active communication with its user base and gathers community feedback through various channels, including community beta testing programs, AMAs, and open discussions, to inform the development process.

G.4 Future Public Offers: There are no planned future public offerings of $ROAM by the issuer. The sale or distribution of $ROAM tokens was conducted during a restricted initial period to secure project development funds, enhance market and brand awareness, and foster community growth. This activity was not undertaken with the repetitiveness or regularity that would constitute a business of buying or selling virtual assets. $ROAM tokens are currently in circulation and can be acquired through secondary market trading venues, as well as through mining, staking processes, or conversion from Roam Points as defined by the protocol's tokenomics.

G.5 Issuer Retained Crypto-Assets: 60000000

G.6 Utility Token Classification: true

G.7 Key Features of Goods/Services of Utility Tokens: Roam operates a dual-token model, comprising Roam Points and the $ROAM token, each offering distinct utilities within the ecosystem.

Roam Points serve as the internal settlement representative, earned through mining activities. These points can be burned to generate $ROAM tokens and are utilized for various in-app services, such as games. Future developments include using them for asset enhancement (merging stickers into NFTs) and accessing privacy-preserving "Who When Where (3W)" data, which provides location and time information for Decentralized ID (DID) holders. Additionally, Roam Points can be swapped with points from other participating projects, redeemed for gift cards and other benefits akin to traditional loyalty programs, and function as a stable value anchor (pegged to a dollar value) to help preserve liquidity during volatile market conditions.

The $ROAM token, a governance and yield token, acts as the native utility token and provides economic incentives for active participation. Its utilities include:

- Community Governance: Holders gain voting rights within the decentralized autonomous organization (DAO) structure to shape the network's future direction.
- Staking Rewards: Users can stake $ROAM to generate yield, which particularly boosts the returns for miners.
- Ecosystem Access: Staking $ROAM provides access to global eSIM data monthly.
- Discovery Program Participation: Locking $ROAM offers opportunities to participate in the Roam Discovery Program, gaining early access to physical L1 ecosystem projects.
- Consumption Conversion: $ROAM can be converted back into Roam Points for consumption within the ecosystem.

Collectively, these tokens facilitate access to a suite of goods and services provided by the Roam network:

- Seamless Global OpenRoaming WiFi: Users can traverse public WiFi networks using their DIDs and Verifiable Credentials (VCs), eliminating the need for repeated logins, password sharing, and redundant registrations, while ensuring secure, automatic connections across millions of networks.
- Global eSIM Connectivity: Access to global eSIM products offering never-expiring data plans in over 160 countries, with potential for voice and SMS support through premium eSIMs, significantly reducing roaming fees by up to 80%.
- Decentralized Infrastructure Services: The network leverages MetaBlox miners to function as OpenRoaming nodes, distributed Content Delivery Network (CDN) nodes, and providers of IP-based services. These miners also serve as edge computing units, offering wireless access, storage, and computing capabilities.
- Privacy-Preserving Data Infrastructure: The network generates and enables controlled access to privacy-protected "3W" (Who, When, Where) data, which is valuable for AI training and various Web3 and Web2 applications, aligning with the Trust-Over-IP stack.
- Application Ecosystem: Users gain access to a marketplace of applications built on the Roam network, featuring crypto payment gateways, check-in-to-earn apps, and point-redemption reward systems.

G.8 Utility Tokens Redemption: The Roam ecosystem utilizes two primary utility tokens: Roam Points and the $ROAM token, each with distinct redemption functionalities for goods and services.

Roam Points serve as the internal settlement representative and can be redeemed for a variety of in-ecosystem services and benefits, including:
Purchasing third-party applications available within the application market on the Roam Gateway.

Accessing "3W" (Who, When, Where) data and facilitating the posting of advertisements on the network's landing page environments.
Paying for in-app services, such as games.
Exchanging for gift cards and various other benefits, akin to traditional telecom loyalty programs.
Activating a mining device or modifying its operational location.
Redeeming for other digital assets outside the Roam ecosystem, exclusively through applications approved by the Roam Foundation.

The $ROAM token provides utility through staking and conversion mechanisms, which enable access to services such as:
Staking to receive monthly Roam Global eSIM data.
Converting back into Roam Points, thereby allowing holders to access and consume the aforementioned services and benefits offered through Roam Points.

G.9 Non-Trading request: true

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

G.11 Crypto-Assets Transfer Restrictions: A significant portion of $ROAM tokens, specifically those allocated to the team and for initial sales from the Token Generation Event (TGE), are subject to various vesting programs managed under the community's supervision, which restricts their immediate transferability.

Furthermore, the $ROAM token possesses a 'Freeze Authority,' which inherently allows for the imposition of account-level token transfer restrictions. This capability could potentially lead to limitations on asset liquidity or the immobilization of user funds. While a multi-signature mechanism has been implemented to mitigate the risks associated with these administrative privileges, the underlying authority to restrict transfers exists.

It is also noted that the Company and Distributor disclaim liability for the value, transferability, or liquidity of $ROAM. Any secondary market for $ROAM would operate independently, and users' ability to transfer tokens may be subject to policies set by exchanges or evolving regulatory frameworks.

G.12 Supply Adjustment Protocols: true

G.13 Supply Adjustment Mechanisms:

The supply adjustments depend on the community, if the community wishes to burn the assets onchain and reduce the token supply they can do it via the Roam App.

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: Panama

G.19 Competent court: Panama

H. Information on the Underlying Technology

H.1 Distributed ledger technology: The Roam network migrated all on-chain activities to the Solana Mainnet in April 2024. The token management program is built on the Solana blockchain, utilizing the Anchor framework. The $ROAM token is also natively multichain on the BNB chain, a capability powered by Wormhole's Native Token Transfer (NTT) technology.

H.2 Protocols and technical standards: The Roam network architecture combines established industry standards with a proprietary protocol. The system's foundation is the Roam Protocol, a data exchange layer designed in alignment with the Trust over IP (ToIP) stack. This protocol is fully compatible with the W3C's standards for Decentralized Identifiers (DID) and Verifiable Credentials (VC), employing various cryptographic algorithms including Elliptic Curve Cryptography (ECC), Zero-Knowledge Proofs (ZKPs), and hash functions like SHA256 and KECCAK-256.
For wireless connectivity, the network utilizes the OpenRoaming and Passpoint™ (Hotspot 2.0) frameworks, which are built on enterprise-grade standards such as IEEE 802.1x for network access control and IEEE 802.11u for network discovery. Authentication is managed via the Extensible Authentication Protocol (EAP), with specific implementations for EAP-TTLS and EAP-TEAP, which establish a secure TLS tunnel. Backend authentication, authorization, and accounting (AAA) processes are handled by a distributed RADIUS (Remote Authentication Dial-In User Service) system. The protocol is built on the Solana blockchain, developed using the Anchor framework. It is also EVM compatible and natively multichain on the BNB chain, facilitated by Wormhole's Native Token Transfer (NTT) technology. For hardware management, Roam gateways use the Control and Provisioning of Wireless Access Points (CAPWAP) protocol.

H.3 Technology Used: The core of the project is the Roam protocol, a data exchange protocol designed in accordance with the Trust Over IP (ToIP) stack. This protocol is fully compatible with the World Wide Web Consortium (W3C) standards for Decentralized Identifiers (DIDs) and Verifiable Credentials (VCs), enabling secure and seamless authentication for its OpenRoaming Network. The $ROAM token is a multi-chain asset, implemented on the Solana blockchain using the Anchor framework and on the BNB Chain, powered by Wormhole's Native Token Transfers (NTT).
The physical infrastructure includes Roam mining devices which function as WiFi routers. To ensure security, the controlling private key for each device is stored locally within a trustzone or a Trusted Platform Module (TPM) chip. Users primarily interact with the ecosystem via the Roam mobile application, which includes a crypto wallet and manages the DIDs and VCs required for network access.
For a comprehensive overview of the protocols and standards employed, please refer to the relevant sections of this document.

H.4 Consensus Mechanism: The Roam protocol does not operate its own native consensus layer but instead relies on the consensus mechanisms of the blockchains where its on-chain activities are conducted. The network's primary on-chain functions

have been migrated to the Solana blockchain, which utilizes a unique consensus model combining Proof-of-History (PoH) with Proof-of-Stake (PoS).
The $ROAM token is also natively multichain on the BNB Chain. The BNB Chain operates using a Proof-of-Staked Authority (PoSA) consensus mechanism, where a limited number of validators are chosen to produce blocks based on their staked assets and reputation.
Additionally, the Roam ecosystem features a "Proof-of-Service" and "Proof-of-Validation" mining process. This is an application-layer incentive mechanism designed to reward WiFi miners for providing network services and Validators for verifying the status and quality of those services, rather than a blockchain consensus mechanism for block production.

H.5 Incentive Mechanisms and Applicable Fees: The Roam network is built upon a Proof-of-Service and Proof-of-Validation economic model, designed to incentivize network growth and service provision. The system utilizes a dual-token structure consisting of Roam Points and the native utility token, $ROAM.
Participants are incentivized through the following mechanisms:

- Wi-Fi Miners: Miners who provide continuous and high-quality Wi-Fi services are rewarded with Roam Points. These rewards are distributed after a Validator confirms the service quality and submits a proof to the blockchain.
- Validators: Validators are compensated with Roam Points for verifying the network services provided by miners. To participate, Validators are required to stake a specified amount of $ROAM tokens as a security deposit.
- Staking: The generation of $ROAM tokens is facilitated through staking pools where users can stake either Roam Points or existing $ROAM tokens. Staking is also mandatory for key network participants, such as RADIUS service operators and mining device manufacturers, to ensure their commitment and maintain service standards.

Applicable fees within the ecosystem include:

- Activation Fee: An activation fee, payable in Roam Points, is required for each new mining device joining the network.
- Ecosystem Tax: Transactions within the Roam application marketplace, such as purchasing third-party applications, are subject to a 5% value-added tax payable in Roam Points.

H.6 Use of Distributed Ledger Technology: false

H.7 DLT Functionality Description: N/A

H.8 Audit: true

H.9 Audit outcome: A security audit of the Roam Token Manager, developed using the Anchor framework on the Solana blockchain, was conducted by the SlowMist security team between February 17 and February 18, 2025. The audit identified four low-risk

vulnerabilities, including issues related to verification for vault accounts, preemptive initialization risk, and excessive permission risks for administrators in the ROAM token. All identified low-risk vulnerabilities have been acknowledged by the project team, and solutions have been provided.

Link:
https://oss.weroam.xyz/static/files/2025/11/5/98598c3c-af01-4111-8322-f09bbc2ad1fe.pdf

I. Information on Risks

I.1 Offer-Related Risks: Acquiring, holding, and using $ROAM tokens involves numerous risks associated with the offer to the public and the admission to trading. The Roam network is in its initial stages of development, and prospective participants should be aware that this could lead to the partial or complete loss of their assets. By participating, you expressly acknowledge, accept, and assume the following risks: 1. Uncertain Regulatory Environment and Enforcement Actions: The regulatory landscape for crypto-assets, including the Roam network and the $ROAM token, is unclear and constantly evolving across many jurisdictions. It is impossible to predict how or when regulatory bodies might apply existing laws or introduce new ones. Such regulatory actions could negatively impact the Roam network's operations, the utility and value of $ROAM tokens, and the project's overall viability. In the event that new laws or regulations make it illegal or commercially undesirable to operate in a specific jurisdiction, the Company may be forced to cease its operations there. 2. Risks Associated with Project Development and Execution: There is a significant risk that the development of the Roam network may not be implemented as planned or may fail entirely. The project's success is contingent upon overcoming numerous challenges, including but not limited to, unforeseen technical difficulties, a decline in the value of digital assets, or a shortage of development funds. The design concepts, consensus mechanisms, algorithms, and other technical parameters are subject to frequent updates and changes as development progresses. 3. Inadequate Disclosure of Information: As the Roam network is still under development, complete and final information may not be available. While this document contains the most current information, it is not exhaustive and may be adjusted by the team. The team is under no obligation to keep token holders informed of every development detail or milestone, which could lead to decisions being made based on incomplete information. 4. Security Weaknesses and Vulnerabilities: The Roam network and the $ROAM token may be targeted by malicious actors. Potential security threats include malware attacks, denial-of-service attacks, consensus-based attacks, Sybil attacks, smurfing, and spoofing. Furthermore, there is a risk that weaknesses could be intentionally or unintentionally introduced into the core infrastructure by third parties or team members. Advances in cryptography and technology, such as the development of quantum computing, could also render the current cryptographic consensus mechanisms ineffective, posing a substantial risk to the security of the network. 5. Risk of Dissolution and Business Failure: As a start-up venture, the Company and its affiliates face a high degree of financial and operating risk. The project may encounter unexpected problems in areas such as product development, marketing, financing, and general management. It is possible that, due to various factors including unfavorable fluctuations in currency values, low adoption of the Roam network, failure of commercial relationships, or intellectual property challenges, the project may no longer be viable to operate, potentially leading to the dissolution of the Company and its affiliates. 6. Other Unanticipated Risks: The risks outlined above are not exhaustive. There are other risks associated with your participation in the Roam network and the acquisition, holding, and use of $ROAM that the Company cannot anticipate. These risks may materialize as

unforeseen variations or combinations of the risks mentioned. Prospective acquirers should conduct their own full due diligence on the Company, its affiliates, the team, and the overall framework of the Roam network before making any commitment.

I.2 Issuer-Related Risks: The issuer of the $ROAM token is the MetaBlox Foundation, a foundation established in Panama. The development and operation of the Roam network, which provides the utility for the $ROAM token, is conducted by a separate entity, MetaBlox Technologies Inc. The success of the issuer is therefore intrinsically linked to the performance and viability of this operating entity. Prospective acquirers of the token should consider the following risks associated with the issuer: 1. Financial Instability and Going Concern Risk The operating entity, MetaBlox Technologies Inc., on which the Foundation depends for the development of the Roam network, is in a precarious financial position. Financial statements indicate a history of significant and increasing net losses, a substantial accumulated deficit, and negative shareholder equity. As of the end of the 2024 fiscal year, the company's total liabilities significantly exceeded its total assets, indicating a state of technical insolvency. This severe financial distress raises substantial doubt about the operating entity's ability to continue as a going concern. A failure or dissolution of the operating company would directly and catastrophically impact the Roam network's development and long-term viability, which would likely render the tokens issued by the Foundation illiquid and valueless. 2. Governance and Structural Risks The MetaBlox Foundation utilizes a nominee governance structure. The members of its Foundation Council act solely as nominees with no beneficial interest in the Foundation itself. They are bound to act only upon the written instructions of the beneficial owners. This structure introduces several risks: Lack of Transparency: The identities of the ultimate beneficial owners who control the Foundation's decisions and assets may not be publicly disclosed, reducing transparency and accountability. Concentration of Power: Key decisions rest with a small, potentially anonymous group of individuals. This concentration of control could lead to actions that are not aligned with the interests of the broader community of token holders. Liability and Indemnification: The nominee directors are fully indemnified by the beneficial owners against any liabilities arising from their roles. While standard practice in such structures, this may reduce the personal accountability of the formal directors. 3. Dependence on a Separate Operating Entity The Foundation's primary function is to issue tokens and support the ecosystem, but it is wholly dependent on MetaBlox Technologies Inc. for all technical development, business operations, and execution of the project roadmap. This separation creates a critical dependency risk. Any operational failures, management disputes, legal challenges, or strategic missteps by the operating company will directly and negatively impact the Foundation's ability to fulfill its mission and will undermine the utility and value of the $ROAM token. 4. Regulatory and Legal Risks The Foundation is established in Panama, and the regulatory environment for crypto-assets, distributed ledger technology, and token issuers remains uncertain and continues to evolve globally. The activities of the Foundation or the Roam network could be subject to new, restrictive, or prohibitive regulations in key jurisdictions. Such regulatory actions could make it illegal or commercially unfeasible to continue operations, forcing a shutdown of the project and negatively impacting the value of

$ROAM. 5. Risk of Project Failure and Incomplete Development The utility of the $ROAM token is entirely contingent upon the future successful development and adoption of the Roam network. As the project is still in its developmental stages, there is a significant risk that it will not be executed or implemented as planned. Potential obstacles include, but are not limited to, unforeseen technical difficulties, a failure to secure sufficient development funds, a decline in the value of digital assets, or an inability to achieve market adoption. Failure to fully develop the network would eliminate the token's utility.

I.3 Crypto-Assets-related Risks: Acquiring, holding, and using $ROAM tokens for participation in the Roam network involves numerous risks. In a worst-case scenario, these could lead to the loss of all or part of the $ROAM held. Prospective participants should expressly acknowledge, accept, and assume the following risks: 1. Regulatory and Enforcement Risks: The regulatory status of distributed ledger technology, the Roam network, and the $ROAM token remains unclear or unsettled in many jurisdictions. It is impossible to predict how or when regulatory agencies may apply existing laws or create new regulations. Such regulatory actions could negatively impact the Roam network and the value of $ROAM. Changes in law could make it illegal or commercially undesirable for the Company to operate in certain jurisdictions, potentially forcing a cessation of operations. 2. Project Development and Execution Risks: The Roam network is currently in its initial development stages. There is a substantial risk that the development will not be executed or implemented as planned. This could be due to a variety of reasons, including unforeseen technical difficulties, a shortage of development funds, or a decline in the prices of digital assets. The project's design concepts, consensus mechanisms, algorithms, and other technical details may be frequently updated and changed. 3. Security and Technical Vulnerabilities: The network is exposed to security weaknesses. Hackers or other malicious actors may attempt to interfere with the network and its tokens through various means, including malware attacks, denial-of-service attacks, consensus-based attacks, Sybil attacks, smurfing, and spoofing. There is also a risk that weaknesses may be unintentionally introduced into the core infrastructure. Furthermore, future advances in cryptography, such as the development of quantum computing, could present unknown risks by rendering the cryptographic consensus mechanism ineffective. Audits have also identified specific risks related to excessive administrator privileges in the token contract, which, if exploited, could lead to unlimited token minting or the freezing of user accounts, thereby posing a significant threat to the ecosystem. 4. Market and Financial Risks: $ROAM tokens may have no value, and there is no guarantee or representation of their value or liquidity. The token is not an investment product and is not intended for speculative investment. The development of a secondary market for trading $ROAM is not guaranteed and, if one develops, it would be operated independently of the Company. The token does not represent any shareholding, ownership, or right to future revenue, profits, or dividends. Participants must be aware that they could lose their entire acquisition amount. 5. Risk of Dissolution: Start-up companies, including the entities behind the Roam network, involve a high degree of risk. They often face unexpected problems in areas of product development, marketing, financing, and general

management. It is possible that due to unfavorable fluctuations in currency values, low adoption of the network, failure of commercial relationships, or other challenges, the Roam network may no longer be viable to operate, and the associated entities may be dissolved. 6. Inadequate Disclosure of Information: As the project is under continuous development, the information available may not be absolutely complete and is subject to adjustment and updates by the team. There is no obligation for the team to keep holders of $ROAM informed of every detail regarding the project's development progress and milestones.

I.4 Project Implementation-Related Risks: The Roam network is currently in its initial development stages, and its implementation is subject to a variety of risks and uncertainties. Prospective participants should be aware that acquiring, holding, and using $ROAM tokens involves numerous risks which, in a worst-case scenario, could lead to a partial or total loss of the assets held. The key risks associated with the project's implementation are as follows: Risk of Development Failure The successful development and implementation of the Roam network are not guaranteed. There is a tangible risk that the project will not be executed or completed as planned. This could be due to a variety of factors, including, but not limited to: - Unforeseen Technical Difficulties: The project may encounter unexpected technical challenges and bugs during the development, testing, and deployment phases that could delay or halt progress. - Shortage of Development Funds: The continued development of the network is dependent on sufficient funding. A decline in the market value of digital assets, including the $ROAM token, or a failure to secure adequate financial resources could impede or stop development activities. - Market Conditions: Unfavourable fluctuations in the value of cryptographic and fiat currencies could negatively impact the project's financial viability and its ability to fund ongoing operations and development. Security and Infrastructure Weaknesses The integrity and security of the Roam network are critical to its success. However, the network's infrastructure is exposed to various security threats: - External Attacks: Malicious actors, such as hackers or organized groups, may attempt to interfere with the network and the $ROAM token through various means, including malware, denial-of-service (DoS) attacks, consensus-based attacks, Sybil attacks, smurfing, and spoofing. - Internal Vulnerabilities: There is a risk that a third party or a member of the project team could, intentionally or unintentionally, introduce weaknesses or vulnerabilities into the core infrastructure of the network, which could compromise its security and functionality. - Cryptographic Risks: The field of cryptography is constantly evolving. Future technological advances, such as the development of quantum computing, could render the cryptographic consensus mechanism that underpins the network's blockchain protocol ineffective, presenting significant and currently unknown risks to its security. Early-Stage Project Uncertainties The Roam network is an ongoing project. Its design concepts, consensus mechanisms, algorithms, code, and other technical details and parameters are subject to continuous updates and changes. This dynamic nature means that the final implemented product may differ from what is described in current documentation. This lack of finality introduces a level of uncertainty and risk regarding the network's ultimate features and performance. Operational Risks and Viability As a start-up venture, the project is subject

to a high degree of risk. The entities involved face significant financial and operational challenges typical of early-stage companies. Unexpected problems may arise in areas such as product development, marketing, financing, and general management. It is possible that the project may no longer be viable to operate due to factors like the failure of commercial relationships, challenges related to intellectual property ownership, or a failure to achieve widespread adoption. In such a scenario, the operating entities may be dissolved, ceasing all development and implementation efforts.

I.5 Technology-Related Risks: The technology underpinning the Roam network, while integral to its function, is exposed to various risks inherent in distributed ledger technology and network infrastructure. Security Weaknesses and External Threats: The network is a potential target for malicious actors who may attempt to interfere with its operations and the $ROAM token. These threats include a variety of attack vectors such as malware, denial-of-service (DoS) attacks, consensus-based attacks, Sybil attacks, smurfing, and spoofing. The successful execution of such attacks could disrupt network services and compromise the integrity of the ecosystem. Furthermore, there is a risk that third parties or internal members could, whether intentionally or unintentionally, introduce vulnerabilities into the core infrastructure, which could negatively affect the network and its users. Cryptographic Vulnerabilities: The long-term security of the network relies on established cryptographic standards. However, the field of cryptography is continuously evolving. Future technological advances, most notably the development of quantum computing, could potentially render existing cryptographic consensus mechanisms obsolete. Such a breakthrough would present a significant, though currently theoretical, risk to the security of the $ROAM token and the entire network infrastructure. Smart Contract and Authority Risks: Security audits of the token management smart contracts have identified several areas of risk. A significant concern is the concentration of critical administrative privileges. Key authorities, including the ability to mint new tokens, freeze accounts, and update core token parameters, are centralized. This creates a single point of failure; if the private keys managing these functions were compromised, an attacker could potentially mint unlimited tokens, freeze user funds, or alter fundamental token characteristics, leading to severe damage to the ecosystem. Other identified risks, while assessed as low, include the potential for reordering attacks during the contract initialization phase and the possibility of account substitution attacks if vault accounts are not properly verified, which could lead to unpredictable behavior during token distribution. Development Risks: The Roam network is in an ongoing state of development. Its design concepts, consensus mechanisms, algorithms, and other technical parameters are subject to continuous updates and changes. There is an inherent risk that the project may encounter unforeseen technical difficulties or a shortage of development funds, which could delay or prevent the successful execution of the planned roadmap. Participants should be aware that the technical details of the project may evolve, and there is no guarantee that the final implemented network will perfectly match the initial conceptual designs.

I.6 Mitigation measures: To address the risks associated with the technology utilized, a comprehensive framework of mitigation measures has been established, focusing on

security, regulatory compliance, and operational integrity. Technical and Security Mitigation Measures 1. Smart Contract Security Audits: The integrity of our on-chain infrastructure is paramount. All smart contracts, including the token management program, undergo rigorous security audits conducted by reputable third-party firms such as SlowMist. These audits test for a wide range of common and project-specific vulnerabilities, including re-entrancy, authority control issues, and transaction ordering dependence. All identified vulnerabilities are acknowledged and addressed to ensure the security of the contracts. 2. Multi-Signature Controls: To mitigate the risk of excessive administrator privileges and single points of failure, critical functions such as token minting, freezing, and parameter updates are managed through a multi-signature mechanism. This requires approval from multiple key holders before any significant action can be executed, thereby preventing unauthorized or malicious use of administrative powers. 3. Hardware-Level Security: Mining devices integral to the network are designed with robust security. Each device's controlling private key is stored locally within a secure hardware element, such as a trustzone or a Trusted Platform Module (TPM) chip. This ensures that the keys are inaccessible to any external party, including the Roam Foundation, giving device owners full control and safeguarding against physical and remote attacks. 4. Device Certification and Licensing: To protect the network’s integrity and prevent fraudulent activities, a mandatory audit and certification process is enforced for all mining device manufacturers. This process verifies hardware quality, security implementations, and compliance with the Roam protocol. Certified manufacturers are also required to stake a significant amount of tokens as collateral to ensure their commitment to the ecosystem's health. 5. Advanced Cryptography and Secure Protocols: The Roam protocol is built upon proven cryptographic algorithms and industry-acknowledged standards, including Elliptic Curve Cryptography (ECC) and zero-knowledge proof schemes like Camenisch-Lysyanskaya (CL) signatures. These technologies are employed for selective data disclosure and to ensure that all communications and data exchanges within the network are secure, private, and confidential by design. Privacy and Regulatory Compliance Measures 1. Privacy by Design: The system architecture is fundamentally designed to protect user privacy. Users are represented by Decentralized Identifiers (DIDs), which are self-declared and anonymous. This ensures that the network's collected data (e.g., connection location and time) is disassociated from real-world identities, preserving user anonymity. 2. Compliance with Regulatory Requirements: The protocol is designed to be adaptable to varying jurisdictional requirements. For regions where user identification is mandatory for internet access, a Know Your Customer (KYC) process can be implemented for Verifiable Credential (VC) issuers. The VC issuer, not the Roam network, maintains the link between a user's real-world identity and their issued credentials. This model allows regulatory bodies to conduct investigations by liaising directly with the relevant VC issuer, ensuring compliance without compromising the network's decentralized nature. 3. Legal Consultation: To navigate the uncertain regulatory landscape of distributed ledger technology, we have engaged specialist legal advisors and obtained a formal legal opinion on the token distribution model. Operations are conducted in accordance with prevailing market practices and legal guidance to

mitigate regulatory risks. Operational and Development Mitigation Measures 1. Failure to Develop: The risk of development failure is mitigated by strong financial backing from prominent venture capital firms and strategic investors, including Samsung Next. Successful seed, angel, and Series A funding rounds have secured the necessary capital to execute the long-term development roadmap. 2. Experienced Team: The project is led by a team of professionals with extensive experience in telecommunications, IoT, blockchain technology, finance, and enterprise management. This expertise ensures that the project is guided by sound technical and business strategies, minimizing operational risks. Through this multi-faceted approach, we proactively address technological risks, ensuring the Roam network is secure, compliant, and resilient.

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

S.1 Name: MetaBlox Technologies inc.

S.2 Relevant legal entity identifier: N/A

S.3 Name of the crypto-asset: ROAM

S.4 Consensus Mechanism: The Roam protocol does not operate its own native consensus layer but instead relies on the consensus mechanisms of the blockchains where its on-chain activities are conducted. The network's primary on-chain functions have been migrated to the Solana blockchain, which utilizes a unique consensus model combining Proof-of-History (PoH) with Proof-of-Stake (PoS). The $ROAM token is also natively multichain on the BNB Chain. The BNB Chain operates using a Proof-of-Staked Authority (PoSA) consensus mechanism, where a limited number of validators are chosen to produce blocks based on their staked assets and reputation. Additionally, the Roam ecosystem features a "Proof-of-Service" and "Proof-of-Validation" mining process. This is an application-layer incentive mechanism designed to reward WiFi miners for providing network services and Validators for verifying the status and quality of those services, rather than a blockchain consensus mechanism for block production.

S.5 Incentive Mechanisms and Applicable Fees: The Roam network is built upon a Proof-of-Service and Proof-of-Validation economic model, designed to incentivize network growth and service provision. The system utilizes a dual-token structure consisting of Roam Points and the native utility token, $ROAM.
Participants are incentivized through the following mechanisms:

- Wi-Fi Miners: Miners who provide continuous and high-quality Wi-Fi services are rewarded with Roam Points. These rewards are distributed after a Validator confirms the service quality and submits a proof to the blockchain.
- Validators: Validators are compensated with Roam Points for verifying the network services provided by miners. To participate, Validators are required to stake a specified amount of $ROAM tokens as a security deposit.
- Staking: The generation of $ROAM tokens is facilitated through staking pools where users can stake either Roam Points or existing $ROAM tokens. Staking is also mandatory for key network participants, such as RADIUS service operators and mining device manufacturers, to ensure their commitment and maintain service standards.

Applicable fees within the ecosystem include:

- Activation Fee: An activation fee, payable in Roam Points, is required for each new mining device joining the network.

- Ecosystem Tax: Transactions within the Roam application marketplace, such as purchasing third-party applications, are subject to a 5% value-added tax payable in Roam Points.

S.6 Beginning of the period to which the disclosure relates: 2024-09-25

S.7 End of the period to which the disclosure relates: 2025-09-25

S.8 Energy consumption: 27,500kWh

S.9 Energy consumption sources and methodologies:

Roam is an application-layer protocol operating on top of the Solana and BNB Chain networks. As Roam does not maintain or operate independent validator or mining infrastructure, its incremental energy usage is limited to: Cloud server operations required to support application logic, APIs, and user data storage. Blockchain transaction interactions (smart contract executions and token transfers) on Solana and BNB Chain, both of which are highly energy-efficient Layer 1 networks optimized for low power consumption. To estimate annual electricity usage, standard data center intensity metrics (~400–600 kWh per active server instance per year) were applied to Roam's active backend infrastructure. Based on average cloud workload and transactional throughput, the resulting total annual energy use is approximately 27,500 kWh (≈ 27.5 MWh). This estimate includes all direct cloud-based services used by Roam to operate its decentralized application and user network, while excluding the baseline operational energy already accounted for by Solana and BNB Chain validators.

Data Sources: Solana Foundation Climate Report 2024 (https://solana.com/news/solana-energy-use-report-2024) BNB Chain Sustainability Overview (https://www.bnbchain.org/en/blog/sustainability-and-efficiency) International Energy Agency (IEA) Data Center Efficiency Benchmarks, 2023