Legal & Privacy

Table of contents

Card Services
- Terms & Conditions
- Special Terms & Conditions EN
- Privacy and Cookie Policy
- Prohibited Products

Cryptoasset Services
- White Papers
  - XMN White Paper
- Terms of Service
  - Cifralfabeto Unipessoal Lda
  - Modernityparty OU
- Privacy Policy
  - Cifralfabeto Unipessoal Lda
  - Modernityparty OU

XMN White Paper

Last Updated: September 5, 2025

XMN – xMoney Token

Version 1.0, published on 2025-09-05

0. **Table of Contents**

COMPLIANCE STATEMENTS 3

SUMMARY 3

Part A – Information about the offeror or the person seeking admission to trading 5

Part B – Information about the issuer 6

Part C - Information about the operator of the trading platform 7

Part D - Information about the crypto-asset project 7

Part E - Information about the offer to the public of crypto-assets 12

Part F - Information about the crypto-assets 16

Part G - Information on the rights and obligations attached to the crypto-assets 19

Part H – information on the underlying technology 22

Part I – Information on risks 30

Part J – Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts 33

1. **DATE OF NOTIFICATION**

   2025-08-01

COMPLIANCE STATEMENTS

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

   Where relevant in accordance with Article 6(3), second subparagraph of Regulation (EU) 2023/1114, reference shall be made to 'person seeking admission to trading' instead of 'offeror'.

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

4. The XMN token may lose its value in part or in full, may not always be transferable and may not be liquid.

5. Not applicable

6. The XMN token is not covered by the investor compensation schemes under Directive 97/9/EC of the European Parliament and of the Council.

   The XMN token is not covered by the deposit guarantee schemes under Directive 2014/49/EU of the European Parliament and of the Council.

SUMMARY

7. **Warning**

   This summary should be read as an introduction to the crypto-asset white paper.

   The prospective holder should base any decision to purchase XMN on the content of the crypto-asset white paper as a whole and not on the summary alone.

   The availability of XMN on secondary trading platforms 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.

8. **Characteristics of the crypto asset**

   The XMN token ($XMN) is a token, classified under Title II of MiCAR as a crypto-asset distinct from asset-referenced tokens (ART) or e-money tokens (EMT).

   XMN token has a supply of 10,000,000,000. There will be no more future issuance of XMN token beyond the total supply, unless determined necessary by the collective vote of XMN token holders on XMN Network's governance forum.

   XMN token holders benefit from lower fees for merchants, enhanced loyalty rewards for buyers, early access to new features, and voting rights on select governance proposals unrelated to the company's core business.

   The initial supply is allocated as follows:

   - **Private Investors** – 10%: For early strategic backers (subject to lock- up and vesting)
   - **Team** – 25%: For founders, contributors, and advisors (subject to lock- up and vesting)
   - **Community Incentives** – 30%: For user acquisition, engagement, referrals, and ecosystem growth
   - **Treasury** – 25%: For product development, partnerships, liquidity, technology and strategic investments
   - **Staking Rewards** – 10%: To incentivize network participation

   This allocation is designed to ensure a balanced, long-term approach to ecosystem development and value distribution.

9. Not applicable

10. Key information about admission to trading:

Date for admission to trading	Proposed date for admission to trading: 08 September 2025
$XMN supply admitted to trading	At the time of listing, the circulating supply of XMN is expected to consist primarily of tokens allocated to liquidity provisioning, support for the existing community, marketing incentives, and early staking rewards, with an estimated total of approximately 650 million tokens. The token will not be offered for subscription to the general public. Instead, it will be directly admitted to trading on selected exchanges.
Admission to trading price	The token price will be determined through market trading activity on the admitted trading platforms
Target holders of tokens	Retail and professional investors
Trading platforms for which admission to trading is being sought	Bybit, Bit2me, Bitvavo

Part A – Information about the person seeking admission to trading

1. **Name**
   xMoney Labs AG
2. **Legal form**
   Public Limited Company
3. **Registered address**
   c/o SERATIO Treuunternehmen reg. Werdenbergerweg 11 Vaduz, 9490 Liechtenstein
4. **Head office**
   c/o SERATIO Treuunternehmen reg. Werdenbergerweg 11 Vaduz, 9490 Liechtenstein
5. **Registration Date**
   2024-11-21
6. **Legal entity identifier (LEI)**
   5299001F1ZB58S6JDZ54
7. **Another identifier required pursuant to applicable national law**
   FL-0002.695.712-3
8. **Contact telephone number**
   423 236 10 10
9. **E-mail address**
   contact@xmoney.com
10. **Response Time (Days)**
    005
11. **Parent Company**
    XMG Foundation
12. **Members of the Management body**

Full Name	Business Address	Function
Grigorios Siourounis	c/o SERATIO Treuunternehmen reg. Werdenbergerweg 11 Vaduz, 9490 Liechtenstein	Director
Iosif Andrei Adam	c/o SERATIO Treuunternehmen reg. Werdenbergerweg 11 Vaduz, 9490 Liechtenstein	Director
Seratio Treuunternehme n reg.	c/o SERATIO Treuunternehmen reg. Werdenbergerweg 11 Vaduz, 9490 Liechtenstein	Director

13. **Business Activity**
    The purpose of the Company is the development of Software Systems and solutions for decentralized network protocols and other network protocols, particularly in connection with digital technologies and data infrastructures of all kinds, as well as the necessary and usable content, products, software, and implementation solutions, which are primarily based on distributed ledger technologies. This includes the Provision of related services, the acquisition and management of Investments, as well as the protection, acquisition, and management of intangible assets and rights of any kind (IP rights) and other assets, particularly the granting of licenses for its intangible assets and rights, as well as the commercial use of rights in any form.
14. **Parent Company Business Activity**
    The Foundation, based in Vaduz, Principality of Liechtenstein, exclusively and irrevocably pursues charitable purposes in accordance with Art. 107 Para. 4a of the Liechtenstein Persons and Companies Act (PGR).

    The purpose of the Foundation is to accelerate technological progress in society and ensure a beneficial future for humanity. The Foundation intends to achieve this by supporting the creation, building, development, and funding of technologies or efforts that can significantly contribute to this goal. These technologies include, in particular, blockchain technology, artificial intelligence, new and sustainable energy sources, centralized and decentralized networks and systems, digital assets, and other emerging new technologies (the "Technologies").
15. **Newly Established**
    'False – No
16. **Financial condition for the past three years**
    No financial history is available because the xMoney Labs AG was incorporated on 24 November 2024. Its first (extended) fiscal year runs from the date of incorporation through 31 December 2025.
17. **Financial condition since registration**

xMoney Labs AG is a newly incorporated company with no financial history.

Part B – Information about the issuer

1. **Issuer different from person seeking admission to trading**

No.

Part C – Information about the operator of the trading platform

Not applicable

Part D – Information about the crypto-asset project

1. **Crypto-asset project name**

   xMoney

2. **Crypto-assets name**

   XMN Token
3. **Abbreviation**

   $XMN

4. **Crypto-asset project description**

   xMoney is a robust payment ecosystem that integrates both traditional and crypto payment capabilities, enabling seamless transactions across fiat, crypto, and card networks. Designed to serve both merchants and consumers, it offers fast, cost- efficient, and borderless payments. Complemented by a loyalty point system, xMoney rewards user engagement and merchant activity, enhancing participation across the network. Its two-currency structure—Loyalty Points for everyday rewards and Tokens for premium incentives—creates a more attractive and competitive payment solution, helping drive adoption and business growth while supporting a well-managed and sustainable token economy.
5. **Details of all natural or legal persons involved in the implementation of the crypto-asset project**

Full Name	Business Address	Function
Grigorios Siourounis	c/o SERATIO Treuunternehmen reg. Werdenbergerweg 11 Vaduz, 9490 Liechtenstein	Director
Iosif Andrei Adam	c/o SERATIO Treuunternehmen reg. Werdenbergerweg 11 Vaduz, 9490 Liechtenstein	Director
Seratio Treuunternehme n reg.	c/o SERATIO Treuunternehmen reg. Werdenbergerweg 11 Vaduz, 9490 Liechtenstein	Director

6. **Utility Token Classification**

   "FALSE" - No

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

   Not applicable
8. **Plans for the token**

   Future Milestones:
   - **Business Utility Features: Implement token-based incentives for merchants, including tiered fee reductions, referral bonuses, and feature unlocks linked to XMN holdings and staking activity to drive ecosystem participation and value creation.**
   - **Loyalty Program Implementation: Develop a loyalty framework enabling users to earn and redeem rewards based on engagement, transaction activity, and staking, reinforcing token demand and fostering long-term retention.**
   - **Governance Integration: Enable governance participation through staking, allowing token holders who lock their XMN Tokens to vote on proposals affecting the platform's development and upgrades, promoting decentralized decision-making.**
   - **UTK Community Transition: Launch a structured program to transition existing UTK token holders into the XMN ecosystem, ensuring continuity and rewarding early supporters.**
9. **Resource Allocation**

   The company has allocated internal resources, including legal, compliance, technical, and operational teams, to support the design, audit, and deployment of the token.
10. **Planned Use of Collected Funds or Crypto-Assets**

The funds collected will support the development and expansion of the xMoney ecosystem, including XMN Token within the xMoney ecosystem.

Part E – Information about the offer to the public of crypto- assets or their admission to trading

1. **Public Offering or Admission to trading**

   'ATTR – admission to trading

2. **Reasons for admission to trading**

   XMN will not be offered to the public through a token sale. Instead, it will be made available for trading on secondary platforms to support liquidity for ecosystem rewards, user incentives, and platform utility.
3. **Fundraising Target**

   Not applicable

4. **Minimum Subscription Goals**
   Not applicable

5. **Maximum Subscription Goal**

   Not applicable

6. **Oversubscription Acceptance**

   'False' – No

7. **Oversubscription Allocation**

   Not applicable

8. **Issue Price**

   0.1$

9. **Official currency or any other crypto assets determining the issue price**

   Not applicable

10. **Subscription fee**

    Not applicable

11. **Offer Price Determination Method**

    Not applicable

12. **Total number of traded crypto assets**

    1

13. **Targeted Holders**

    ALL

14. **Holder restrictions**

    Holders of the XMN Token must comply with all applicable regulations and requirements established by the relevant Exchange to be eligible to purchase and hold the token.

    While xMoney Labs AG itself does not impose specific holder restrictions beyond regulatory compliance, prospective holders are advised that they will need to comply with the terms and conditions and policies of any Exchange through which they acquire or hold XMN Token. xMoney Labs AG makes no representations or warranties regarding a user's eligibility to trade on any Exchange.

15. **Reimbursement Notice**

    Not applicable

16. **Refund Mechanism**

    Not applicable

17. **Refund Timeline**

    Not applicable

18. **Offer Phases**

    Not applicable

19. **Early Purchase Discount**

    Not applicable

20. **Time-limited offer**

    Not applicable

21. **Subscription period beginning**

    Not applicable

22. **Subscription period end**

    Not applicable

23. **Safeguarding Arrangements for Offered Funds/Crypto-Assets**

    Not applicable

24. **Payment Methods for Crypto-Asset Purchase**

    Not applicable

25. **Value Transfer Methods for Reimbursement**

    Not applicable

26. **Right of Withdrawal**

    Not applicable
27. **Transfer of Purchased Crypto-Assets**

    Not applicable

28. **Transfer Time Schedule**

    Not applicable

29. **Purchaser's Technical Requirements**

Not applicable

E.30 **Crypto-asset service provider (CASP) name**

Not applicable

1. **CASP identifier**

   Not applicable

2. **Placement form**

   Not applicable

3. **Trading Platforms name**

   Bybit, Bit2me, Bitvavo. This is a non-exhausted list. Further exchange listings may be announced on the website as they are secured.
4. **Trading Platforms. Market Identifier Code (MIC)**

   Not available
5. **Trading Platforms Access**

   Trading platforms are accessible via their respective websites.

   Access is based on each Crypto exchange platform's onboarding process and is not controlled by the xMoney Labs AG.

   The use of services offered by Exchanges may involve costs, including transaction fees, withdrawal fees, and other charges. These costs are determined and set by the respective Exchanges and are not controlled, influenced, or governed by xMoney Labs AG.
6. **Involved costs**

   Not applicable
7. **Offer Expenses**

   Not applicable

8. **Conflicts of Interest**

   No conflict of interests have been identified as of today.

9. **Applicable law**

Any availability of XMN tokens shall be governed by and interpreted in accordance with the laws of Liechtenstein.

E.40 **Competent court**

Subject to mandatory applicable law, any dispute arising out of or in connection with this whitepaper and all claims in connection with the $XMN shall be exclusively, including the validity, invalidity, breach or termination thereof, subject to the jurisdiction of the courts of Liechtenstein.

Part F - Information about the crypto-assets

1. **Crypto-Asset Type**

   According to Art.3 (1) (5) of MiCA, a crypto asset is a digital representation of a value or of a right that is able to be transferred and stored electronically using distributed ledger technology or similar technology.

   The XMN token fulfils the criteria of a crypto asset pursuant to Art. 3 para. 1 no. 5 MiCAR because it is designed as a digital representation of a value or a right that can be transferred and stored electronically. The token is issued entirely digitally and grants rights within the network and the platform, such as access to rewards, lower platform fees and various governance functions within the network.

   $XMN Token falls under Title 2 of MiCAR, being a multi-functional crypto-asset, other than asset-referenced token (ART) and e-money token (EMT).
2. **Crypto-Asset Functionality**

   The $XMN Token provides holders with a range of rights and benefits within the xMoney payment ecosystem, designed to enhance participation and foster network growth. Token functionality includes:
   - **Tiered Fee Reductions for Merchants: Merchants holding and staking $XMN Tokens receive discounted settlement fees, incentivizing higher engagement and transaction volumes.**
   - **Enhanced Loyalty Rewards for Users: Token holders earn loyalty points redeemable for purchases and rewards, with additional incentives unlocked through staking, platform engagement, and gamified quests.**
   - **Early Access to Features: Staked token holders gain priority access to beta releases, promotional campaigns, and new platform functionalities before public rollout.**
   - **Governance Participation: By staking $XMN Tokens, holders acquire voting rights on select governance proposals related to platform development, excluding decisions directly tied to xMoney Labs AG's core business operations.**

     Overall, $XMN Tokens function as multi-purpose utility assets that drive economic activity within the xMoney ecosystem, incentivize participation, and enable decentralized governance, contributing to a sustainable and user-centric payment platform.

3. **Planned Application of Functionalities**

   The $XMN Token's functionalities will be rolled out in phases, each designed to enhance ecosystem participation, drive demand, and support sustainable growth.

   - **Estimated H1 2026 – Transparent Merchant Scoring System**

     Merchants' token holdings will unlock tiered benefits, including fee discounts and increased referral commissions. This system creates a direct economic incentive tied to $XMN ownership, encouraging organic growth and deeper engagement. The amount of discounts and commissions will depend on the merchant's token balance, reinforcing the token's intrinsic value.

   - **Estimated H2 2026 – Loyalty-Based Reward Incentives**

     The token will serve as a loyalty accrual mechanism for users, merchants, and partners. Participants earn rewards for activities that foster ecosystem growth, such as transactions, referrals, and platform engagement. Loyalty tiers based on token holdings and behavior will unlock progressively higher benefits, including fee discounts and exclusive platform rewards, promoting ongoing participation.

   - **Estimated H2 2026 – Ecosystem Growth and Buybacks**

     Tokens will be allocated to developers, advertisers, and community leaders through grants and bounties, driving network development and integrations. Campaigns designed to boost user engagement and attract sponsorship revenue will further increase treasury inflows. A portion of these funds will be used to buy back $XMN Tokens from the market, creating a cyclical demand loop by redistributing tokens to active network participants.

   - **Estimated H1 2027 – Governance & Treasury Management Policy**
     As the ecosystem matures, governance rights will expand. Token holders who lock their $XMN Tokens will gain voting power on platform developments, treasury distributions, and loyalty program parameters. This governance framework is designed to reward long-term commitment and promote progressive decentralization. Dynamic monetary policy tools, such as adjusting reward emissions, staking yields, and buyback allocations, will enable the token model to adapt to ecosystem needs and user behavior.

4. **Type of white paper**

   OTHR

5. **The type of submission**

   NEWT

6. **Crypto-Asset Characteristics**

   $XMN Token falls under Title 2 of MiCAR, being a multi-functional crypto-asset, other than asset-referenced token (ART) and e-money token (EMT). $XMN has a total maximum supply of 10,000,000,000.

7. **Commercial name or trading name**

   XMN

8. **Website of the issuer**

   www.xmoney.com

9. **Starting date of the admission to trading**

   2025-09-08

10. **Publication date**

    2025-09-05

11. **Any other services provided by the issuer**

    According to its corporate purpose, xMoney Labs AG is authorised to develop and commercialise software systems and solutions for decentralised and other network protocols—especially those underpinning digital technologies and data infrastructures of every kind—together with all required content, products, software components and implementation solutions that are primarily based on distributed-ledger technologies; to render all related professional and technical services (including consulting, integration, maintenance, hosting and support); to acquire, hold and manage investments that further or complement its technological focus; to protect, acquire, exploit and administer intangible assets and intellectual-property rights of any nature and to grant licences or other usage rights to them; and, in general, to commercially exploit any assets or rights it holds in any legally permissible form.
12. **Identifier of operator of the trading platform**

    N/A

13. **Language or languages of the white paper**

    English

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**

    Not applicable

15. **Functionally Fungible Group Digital Token Identifier**

    Not applicable

16. **Voluntary data flag**

    'False – mandatory

17. **Personal data flag**

    'True' – Yes

18. **LEI eligibility**

    'True –eligible

19. **Home Member State**

    Liechtenstein serves as the home member state for all EU trading activities and regulatory oversight, in accordance with Article 3(1)(33)(c) of MiCAR. The Financial Market Authority Liechtenstein acts as the competent authority for supervision of trading activities and compliance with MiCAR requirements.
20. **Host Member States**

Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden.

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

1. **Purchaser Rights and Obligations Purchaser Rights**
   Purchasers (holders) of $XMN tokens gain the right to get discounts as a business; obtain more loyalty points as a buyer; contribute early to new features; vote on some governance proposals not related directly to the business model of the company. These rights are proportional to the number of $XMN that they obtain or stake.

   These rights are granted solely by virtue of token ownership and are not linked to any ownership rights, profit-sharing, or claims against xMoney Labs AG.

   Purchasers understand and acknowledge that:

   - $XMN Token falls under Title 2 of MiCAR, being a multi-functional crypto-asset, other than asset-referenced token (ART) and e-money token (EMT) and it does not constitute a financial instrument, security, or e-money.
   - Holding $XMN Token does not entitle the user to voting rights, equity, dividends, or participation in the governance or management of xMoney Labs AG or any other undertaking.
   - The token is issued for the sole purpose of enabling access to digital goods, services, and features of the xMoney Network.
   - Tokenholders of $XMN Token are responsible for maintaining the security of their token holdings and complying with applicable laws in their jurisdiction regarding the use and storage of digital assets.

   Purchaser Obligations

   Purchasers of $XMN must agree to comply at all times with the current terms of service, user agreements, technical specifications, governance procedures and any other binding rules or protocols that govern the operation of the xMoney ecosystem and the use of $XMN.

   Purchasers are solely responsible for properly storing, securing, and managing their $XMN tokens. This includes safeguarding private keys and adhering to best practices for crypto-assets storage and custody.

   Prior to purchasing $XMN tokens, participants may be required to fulfil certain know-your-customer (KYC) and anti-money-laundering (AML) compliance requirements.
2. **Exercise of Rights and obligations**
   To exercise the rights associated with $XMN Tokens, holders must possess and maintain their tokens in accordance with the terms and conditions outlined in this whitepaper and any other applicable rules published on the official xMoney website and may be adjusted through governance proposals approved by token holders.
3. **Conditions for modifications of rights and obligations**

   Modification of rights can only happen after a governance vote where token holders have the option to reject the proposal, it would only happen after a consideration period of at least 10 business days and an implementation period of another 10 business days.
4. **Future Public Offers**

   No future public offerings of $XMN tokens are currently planned. Should the need for such offerings arise, they will be conducted transparently and in compliance with MiCAR.
5. **Issuer Retained Crypto-Assets**

   To support the long-term development and sustainability of the xMoney ecosystem, a portion of the XMN token supply is allocated to the team and treasury. These allocations are structured as follows:

   Team Allocation (25%): Reserved for founders, contributors, employees, and advisors. These tokens are subject to long-term vesting and lock-up schedules to ensure alignment with the project's success and to discourage short-term speculation.

   Treasury Allocation (25%): Held for funding core initiatives, including product development, ecosystem grants, liquidity support, operational needs, and strategic partnerships. Treasury resources may also be used for investments in other relevant businesses and technologies that enhance the overall ecosystem. The treasury enables xMoney Labs AG to respond flexibly to market dynamics and evolving ecosystem demands.
6. **Utility Token Classification**

   False

7. **Key Features of Goods/Services of Utility Tokens**

   N/A

8. **Utility Tokens Redemption**
   N/A

9. **Non-Trading request**

   'True' – sought

10. **Crypto-Assets purchase or sale modalities**

    XMN tokens will be made available for trading on selected exchanges, including platforms such as Bybit, Bit2Me, and Bitvavo, subject to the platforms' own listing processes and approvals.
11. **Crypto-Assets Transfer Restrictions**

    Any transfer restrictions, if any, will be compliant with the applicable regulations.
12. **Supply Adjustment Protocols**

    No

13. **Supply Adjustment Mechanisms**

    Not applicable

14. **Token Value Protection Schemes**

    'False' – No

15. **Token Value Protection Schemes Description**

    Not applicable

16. **Compensation Schemes**

    'False' – No

17. **Compensation Schemes. Description**

    Not applicable

18. **Applicable law**

    Laws of Liechtenstein.

19. **Competent court**

Subject to mandatory applicable law, any dispute arising out of or in connection with this whitepaper and all claims in connection with the $XMN shall be exclusively, including the validity, invalidity, breach or termination thereof, subject to the jurisdiction of the courts of Liechtenstein (Fürstliches Landgericht in Vaduz.).

Part H – information on the underlying technology

1. **Distributed ledger technology**

   Distributed Ledger Technology ('**DLT**') refers to a digital system for recording transactions in which the transactions and their details are recorded in multiple places at the same time. Unlike traditional databases, distributed ledgers have no central data store or administration functionality. Instead, the ledger is decentralized, and consensus on the transactions is achieved through a process that involves multiple nodes, each maintaining its own copy of the ledger.

   Blockchain technology is a subset of DLT, where the distributed database maintains a continuously growing list of records, called blocks, which are linked together in chronological order and secured using cryptographic techniques. A blockchain generally has the following key characteristics:

   - Distribution: A blockchain operates on a network of nodes, each holding a copy of the ledger and each participating in the transaction verification and synchronization process.
   - Security: Blockchain employs advanced cryptographic methods to secure data. Each block contains a cryptographic hash (a 'digital fingerprint') of the previous block, a timestamp, and transaction data. This structure ensures that once data is recorded, it cannot be altered retroactively without also changing all subsequent blocks, which would require consensus from the majority of network nodes.
   - Transparency and Immutability: Transactions on a blockchain are usually visible to all participants in the network, providing transparency. Once a transaction is confirmed and added to the blockchain, it is virtually immutable due to the cryptographic methods used, meaning it cannot be changed or deleted.

2. **Protocols and technical standards**

   The $XMN Token is initially issued on the Sui blockchain using the Move programming language. It follows Sui's native Move-based token standard, similar to Ethereum's ERC-20 but optimized for Sui's object-centric, parallel execution model.

3. **Technology Used**
   The $XMN token operates on the Sui blockchain platform. The technology supports fast transaction finality and parallel execution, enabling efficient and scalable management of crypto-assets.

4. **Consensus Mechanism**
   Sui utilizes the Mysticeti consensus protocol, a Byzantine Fault Tolerant (BFT) mechanism designed specifically for high throughput and low latency on its object-centric blockchain. Unlike traditional Proof-of-Stake or Delegated Proof-of-Stake systems, Mysticeti enables parallel execution of transactions that do not conflict, improving scalability and efficiency. This consensus approach ensures secure and reliable validation of transactions with significantly lower energy consumption compared to earlier consensus models such as Proof-of-Work.
5. **Incentive Mechanisms and Applicable Fees**

   Sui uses a dynamic fee model combining gas fees, staking rewards, and a storage fund to incentivize participation and ensure network efficiency. Validators stake SUI tokens to validate transactions and earn rewards, which token holders can share by delegating their stake. The storage fund accurately prices data storage costs, supporting long-term network sustainability.

   Incentives and Fees:
   - Proof-of-Stake: Validators stake tokens to secure the network and earn rewards.
   - Delegation: Token holders delegate SUI to validators and receive a share of rewards.
   - Dynamic Fees: Transaction fees adjust based on network demand and complexity.
   - Storage Fees: Charged for on-chain data storage, with rebates applied upon data deletion.

   xMoney Labs AG does not impose any additional fees on $XMN Token transactions conducted on the Sui blockchain.

6. **Use of Distributed Ledger Technology**
   "True" - Yes

7. **DLT Functionality Description**
   SUI standard DLT will be used, no further implementation will be done and instead the token will exist on the established chain.

8. **Audit**
   "True" - Yes

9. **Audit outcome**
   The audit outcomes can be found in the public repository of SUI here: **https://github.com/sui-foundation/security-audits**.

Part I – Information on risks

Subject only to the limitations and requirements of MiCA and applicable mandatory statutes, each user of the $XMN tokens as covered by this whitepaper are in their own sole responsibility and at their own sole risk. All liability in regard to the risks mentioned herein is excluded, as far as legally permissible.

xMoney Labs AG nor any of its affiliates operates nor controls, oversees, or manages the functioning of the Exchanges, where the $XMN tokens will be admitted. In addition to the risks included in this section, there might be other risks that cannot be foreseen. Additional risks may also materialize as unanticipated variations or combinations of the risks discussed within this section.

1. **Offer-Related Risks**

   The XMN token may experience considerable price volatility once it becomes available for trading on the market. This price movement could be driven by a variety of market factors and participant activities.

   Listing Related Risks

   Trading Platform Risk: When $XMN tokens holders buy or sell the $XMN tokens on the Exchanges, xMoney labs AG does not serve as a contractual party to the future $XMN tokens holder. Consequently, any legal relationship concerning these trading platforms is subject to their own terms and conditions. xMoney labs AG assumes no responsibility for the operations, services, or outcomes associated with these Exchanges.

   Delisting Risk: xMoney Labs AG cannot guarantee that the $XMN tokens will remain listed or tradeable on any Exchanges. Delisting could significantly hinder the ability of $XMN tokens Token holders to buy, sell, or otherwise transact in $XMN tokens. In the event of delisting, $XMN tokens holders may face challenges in finding alternative markets or counterparties willing to trade $XMN tokens, which could adversely impact the $XMN tokens liquidity and market value.

   Insufficient Depth Risk: There can be no assurance as to the depth or sustainability of the secondary market (if any) in the $XMN tokens, which will affect their liquidity and market price. There is no guarantee of sustained liquidity or that an active secondary market for $XMN tokens will develop or remain stable over time. Regulatory changes may impact trading conditions, exchange availability, or compliance requirements, potentially restricting access to $XMN tokens in certain jurisdictions or imposing additional obligations on holders.

   Failure of the Trading Platform Risk: Disruptions at trading platforms and potential consequences of a trading platform's failure could adversely affect the value of $XMN tokens. Trading platforms operate websites on which users can trade crypto-assets for fiat currencies, such as U.S. Dollars and Euros, or other crypto-assets. Trades on these trading platforms can be unrelated to transfers of the crypto-assets between users via the respective crypto-asset network if the trading platform co-mingles funds and does not offer a unique wallet address for each user. For example, co-mingling refers to a lack of segregation of user assets and is a common practice among many trading platforms. These trading platforms might not provide a unique wallet for each user and as a result, might have one or more large wallets composed of the assets of several users, comingled. This results in a centralization of a large amount of assets in a single location and could therefore increase the amount of damage or theft that can be done from a negative situation such as a hack. As a result, sometimes crypto-assets traded on trading platforms are recorded on the trading platform's internal ledger only, and each internal ledger entry for a trade will correspond to an entry for an offsetting trade in government currency or other crypto-asset. To sell crypto-assets on a trading platform, a user will transfer crypto-assets (using the crypto-assets network) from himself or herself to the trading platform. Conversely, to buy crypto-assets on a trading platform a user will transfer fiat currency or other crypto-assets to the trading platform. After completing the transfer of crypto-assets or fiatcurren-cy, the user will execute its trade and receive either the crypto-assets (using the crypto-assets network) or the fiat currency back into its account.

   Bankruptcy Risk: The Exchanges may go bankrupt, which may result in substantial or even total losses for the $XMN tokens Token holder.

   Regulatory Uncertainty: The regulatory landscape for crypto-assets (including Exchanges) is rapidly evolving and may vary significantly across jurisdictions. While $XMN tokens are issued within the EU, there is a risk that it could be viewed differently in other jurisdictions. This difference in classification may lead to $XMN tokens being subject to additional or conflicting regulatory requirements or even being restricted or deemed non-compliant in certain regions outside the EU. Such discrepancies could impact the issuance, trading, or use of $XMN tokens, potentially limiting its accessibility or functionality in some markets.

   No Guarantee of Admission to Trading on additional exchanges: While the $XMN tokens shall be listed on different exchanges and it is planned to seek admission to trading for $XMN tokens on other exchanges, there is no assurance that this will occur. Delays or failures in obtaining admission could restrict the tokens' marketability and affect their perceived value.
2. **Person Seeking Admission to Trading Related Risks**

   Legal and Regulatory Risk. The legal classification of the XMN token may evolve over time due to regulatory developments, changes in legislative frameworks, or shifts in supervisory practices and interpretations by competent authorities. This dynamic nature of crypto-asset regulation requires ongoing monitoring of both legislative changes and regulatory guidance to ensure continued compliance.

   Non-compliance with these regulations could result in sanctions, potentially affecting the market value of the XMN token.

   Potential lawsuits or adverse legal rulings could impact our operational capacity, negatively affect the XMN token, and potentially harm the interests of prospective holders.

   Fraud and Mismanagement Risks. Fraudulent activities, security incidents, or operational mismanagement could materially impair the XMN token. Such events may damage market confidence and public perception, potentially compromising token accessibility and functionality. The resulting reputational impact could adversely affect token value, creating risks for token holders.

   Risk of domicile of Person Seeking Admission to Trading: The domicile and registered office of the Person Seeking Admission to Trading (xMoney Labs AG) is in Liechtenstein. Tokenholder have to be aware that claims against Person Seeking Admission to Trading may be asserted in Liechtenstein before the Liechtenstein District Court in Vaduz. In case the Tokenholder is a legal entity or a natural person with residence outside of Liechtenstein, Austria and Switzerland, the Tokenholder would with all likelihood be obliged to provide a security deposit for the possible procedural costs of the defendant. In case the security deposit is not provided the claim will be considered as withdrawn. Thus, failure of the Tokenholder to provide the security deposit at all or in time could lead to a loss of the claims of the Tokenholder. Further the Tokenholder needs to be aware that Liechtenstein does not have that many bilateral or multilateral agreements on recognition and enforcement of foreign judgments with other countries.
3. **Crypto-Assets-related Risks**

   Secondary Market Price Risk. Crypto-assets are highly volatile, and the market value of a token may fluctuate due to macroeconomic factors beyond our control. Accordingly, the XMN token may lose its value partially or entirely as a result of market conditions.
   Liquidity Risk. The XMN token may experience periods of limited liquidity in secondary markets, potentially constraining holders' ability to execute transactions at desired prices or volumes. This could result in significant financial losses for prospective holders.
   Scam Risks. There are also risks associated with the misappropriation of crypto-assets from custodial or non-custodial digital wallets, or loss of private keys (seed phrase), which can result in the irreversible loss of crypto-assets.
   Taxation Risks. The tax implications of buying and selling XMN tokens are subject to the specific tax regulations of each jurisdiction.
4. **Project Implementation-Related Risks**

   Inadequate implementation of updates at the protocol level or failure to adapt to the evolving crypto-assets market could adversely affect the XMN token.
5. **Technology-Related Risks**

Blockchain and Smart Contract Vulnerability

The XMN token's smart contracts in SUI are susceptible to coding vulnerabilities, bugs, or security flaws that could be exploited by malicious actors. A breach in the smart contract could result in unauthorized transactions, token loss, or manipulation of staking mechanisms, affecting the token's security and trust among holders. Even though security audits are conducted, unforeseen vulnerabilities may still pose a risk.

Cybersecurity and Data Breach Risks

As a blockchain-based asset, the XMN token is exposed to cybersecurity threats such as hacking, phishing attacks, and data breaches.

Dependency on Underlying Blockchain Stability and Performance

The XMN token operates on the SUI blockchain, meaning its functionality depends on the stability and efficiency of this network. Risks include:

- Network congestion, which may lead to higher transaction fees or slower confirmation times.
- Technical failures, blockchain reorgs, or forks, which could impact token transfers and staking mechanisms.
- Reliance on third-party validators and node operators, which may introduce security vulnerabilities or service disruptions.

Wallet and Private Key Risk

XMN token holders are responsible for the custody of their tokens in a compatible cryptographic wallet and for securing their private keys. Loss of a private key means permanent loss of access to the XMN tokens, with no possibility of recovery. If a holder connects their wallet to malicious applications or platforms, they risk unauthorized access to their assets.

I.6 **Mitigation measures**

xMoney Labs AG and SUI blockchain have implemented various measures to mitigate the risks outlined in Sections I.01 to I.05 above. These include comprehensive disclosures, rigorous technology testing and auditing, and the careful selection of partners. To further reduce exposure to these risks, XMN Token holders should adopt appropriate safeguards based on their chosen custody method and remain vigilant by actively monitoring publicly available news and market signals, enabling them to respond swiftly to significant developments which may result in the materialization of specific risks.

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

J-1 **Adverse impacts on climate and other environment-related adverse impacts**

General information	
S.1 Name Name reported in field A.1	xMoney Labs AG
S.2 Relevant legal entity identifier Identifier referred to in field A.2	Public Limited Company
S.3 Name of the crypto-asset Name of the crypto-asset, as reported in field D.2	XMN Token
S.4 Consensus Mechanism The consensus mechanism, as reported in field H.4	Sui utilizes the Mysticeti consensus protocol, a Byzantine Fault Tolerant (BFT) mechanism designed specifically for high throughput and low latency on its object-centric blockchain. Unlike traditional Proof-of-Stake or Delegated Proof-of-Stake systems, Mysticeti enables parallel execution of transactions that do not conflict, improving scalability and efficiency. This consensus approach ensures secure and reliable validation of transactions with significantly lower energy consumption compared to earlier consensus models such as Proof-of-Work.
S.5 Incentive Mechanisms and Applicable Fees Incentive mechanisms to secure transactions and any fees applicable, as reported in field H.5	Sui uses a dynamic fee model combining gas fees, staking rewards, and a storage fund to incentivize participation and ensure network efficiency. Validators stake SUI tokens to validate transactions and earn rewards, which token holders can share by delegating their stake. The storage fund accurately prices data storage costs, supporting long-term network sustainability. Incentives and Fees: • Proof-of-Stake: Validators stake tokens to secure the network and earn rewards. • Delegation: Token holders delegate SUI to validators and receive a share of rewards. • Dynamic Fees: Transaction fees adjust based on network demand and complexity. • Storage Fees: Charged for on-chain data storage, with rebates applied upon data deletion xMoney Labs AG does not impose any additional fees on $XMN Token transactions conducted on the Sui blockchain.
S.6 Beginning of the period to which the disclosure relates	31.07.2025
S.7 End of the period to which the disclosure relates	30.07.2026
Mandatory key indicator on energy consumption	
S.8 Energy consumption Total amount of energy used for the validation of transactions and the maintenance of the integrity of the distributed ledger of transactions, expressed per calendar year	Per-Transaction Energy Impact Energy consumption per validated transaction: 0,00001 kWh This figure represents the energy required to validate a single transaction on the SUI network. The estimated annual transaction volume for XMN token is 100,000 transactions, resulting in a total annual energy consumption of 1 kWh.
Sources and methodologies	
S.9 Energy consumption sources and Methodologies Sources and methodologies used in relation to the information reported in field S.8	A detailed analysis and methodology can be found here: **https://www.coinhouse.com/esg-report/sui**

xMoney Labs AG is responsible for all the information provided. All information is based on today's market values and represents a non-binding estimate for the future! Every purchase of a cryptocurrency can represent a risk and can even lead to a total loss.

This White Paper is published pursuant to Regulation (EU) 2023/1114 (MiCA) and complies with all applicable requirements. The information contained herein is provided in good faith and to the best of knowledge of xMoney Labs AG. $XMN tokens is a token with no financial instrument characteristics, and the purchase of this token carries no expectation of profit, income, or investment return.

The issuer disclaims all liability for any interpretation of the token's value, utility, or legal classification out-side the scope of MiCA. All statements made in this White Paper are subject to risk disclosures and forward-looking disclaimers contained herein.

In case any necessary changes and required adjustments arise during the project, they will be presented in an updated version of this whitepaper.

Please note that XMN is not regulated or supervised by the National Bank of Romania, but is fully compliant under the applicable EU framework.

Principal member of

© 2025 xMoney. All rights reserved.