

White paper drafted under the European Markets in Crypto-Assets Regulation (EU) 2023/1114 for FFG LJDPGNXXK



Preamble

00. Table of Contents

01. Date of notification11
02. Statement in accordance with Article 6(3) of Regulation (EU) 2023/111411
03. Compliance statement in accordance with Article 6(6) of Regulation (EU) 2023/1114
04. Statement in accordance with Article 6(5), points (a), (b), (c), of Regulation (EU) 2023/1114
05. Statement in accordance with Article 6(5), point (d), of Regulation (EU) 2023/111411
06. Statement in accordance with Article 6(5), points (e) and (f), of Regulation (EU) 2023/1114
Summary12
07. Warning in accordance with Article 6(7), second subparagraph, of Regulation (EU) 2023/1114
08. Characteristics of the crypto-asset
09. Information about the quality and quantity of goods or services to which the utility tokens give access and restrictions on the transferability
10. Key information about the offer to the public or admission to trading
Part A – Information about the offeror or the person seeking admission to trading 14
A.1 Name
A.2 Legal form14
A.3 Registered address
A.4 Head office14
A.5 Registration date14

A.6 Legal entity identifier	14
A.7 Another identifier required pursuant to applicable national law	14
A.8 Contact telephone number	14
A.9 E-mail address	14
A.10 Response time (Days)	15
A.11 Parent company	15
A.12 Members of the management body	15
A.13 Business activity	15
A.14 Parent company business activity	15
A.15 Newly established	15
A.16 Financial condition for the past three years	15
A.17 Financial condition since registration	16
Part B – Information about the issuer, if different from the offeror or personal admission to trading	0
B.1 Issuer different from offeror or person seeking admission to trading	16
B.2 Name	16
B.3 Legal form	16
B4. Registered address	16
B.5 Head office	16
B.6 Registration date	17
B.7 Legal entity identifier	17
B.8 Another identifier required pursuant to applicable national law	17
B.9 Parent company	17
B.10 Members of the management body	17
B.11 Business activity	17

B.12 Parent company business activity17
Part C – Information about the operator of the trading platform in cases where it draws
up the crypto-asset white paper and information about other persons drawing the crypto-
asset white paper pursuant to Article 6(1), second subparagraph, of Regulation (EU)
2023/1114
C.1 Name
C.2 Legal form
C.3 Registered address
C.4 Head office18
C.5 Registration date
C.6 Legal entity identifier
C.7 Another identifier required pursuant to applicable national law18
C.8 Parent company
C.9 Reason for crypto-Asset white paper Preparation18
C.10 Members of the Management body19
C.11 Operator business activity19
C.12 Parent company business activity19
C.13 Other persons drawing up the crypto-asset white paper according to Article 6(1) second subparagraph, of Regulation (EU) 2023/1114
C.14 Reason for drawing the white paper by persons referred to in Article 6(1), second subparagraph, of Regulation (EU) 2023/1114
Part D – Information about the crypto-asset project19
D.1 Crypto-asset project name19
D.2 Crypto-assets name
D.3 Abbreviation

D.4 Crypto-asset project description	19
D.5 Details of all natural or legal persons involved in the implementation of the cr	
asset project	20
D.6 Utility Token Classification	21
D.7 Key Features of Goods/Services for Utility Token Projects	21
D.8 Plans for the token	21
D.9 Resource allocation	21
D.10 Planned use of Collected funds or crypto-Assets	21
Part E – Information about the offer to the public of crypto-assets or their admissi	on to
trading	21
E.1 Public offering or admission to trading	21
E.2 Reasons for public offer or admission to trading	21
E.3 Fundraising target	22
E.4 Minimum subscription goals	22
E.5 Maximum subscription goals	22
E.6 Oversubscription acceptance	22
E.7 Oversubscription allocation	22
E.8 Issue price	22
E.9 Official currency or any other crypto-assets determining the issue price	22
E.10 Subscription fee	23
E.11 Offer price determination method	23
E.12 Total number of offered/traded crypto-assets	23
E.13 Targeted holders	23
E.14 Holder restrictions	23
E.15 Reimbursement notice	23

E.16 Refund mechanism	23
E.17 Refund timeline	23
E.18 Offer phases	23
E.19 Early purchase discount	23
E.20 Time-limited offer	24
E.21 Subscription period beginning	24
E.22 Subscription period end	24
E.23 Safeguarding arrangements for offered funds/crypto- Assets	24
E.24 Payment methods for crypto-asset purchase	24
E.25 Value transfer methods for reimbursement	24
E.26 Right of withdrawal	24
E.27 Transfer of purchased crypto-assets	24
E.28 Transfer time schedule	24
E.29 Purchaser's technical requirements	25
E.30 Crypto-asset service provider (CASP) name	25
E.31 CASP identifier	25
E.32 Placement form	25
E.33 Trading platforms name	25
E.34 Trading platforms Market identifier code (MIC)	25
E.35 Trading platforms access	25
E.36 Involved costs	25
E.37 Offer expenses	25
E.38 Conflicts of interest	26
E.39 Applicable law	26

E.40 Competent court	26
Part F – Information about the crypto-assets	26
F.1 Crypto-asset type	26
F.2 Crypto-asset functionality	27
F.3 Planned application of functionalities	27
A description of the characteristics of the crypto asset, including the data neo classification of the crypto-asset white paper in the register referred to in Art Regulation (EU) 2023/1114, as specified in accordance with paragraph 8 of t	ticle 109 of that Article
F.4 Type of crypto-asset white paper	27
F.5 The type of submission	27
F.6 Crypto-asset characteristics	27
F.7 Commercial name or trading name	27
F.8 Website of the issuer	27
F.9 Starting date of offer to the public or admission to trading	28
F.10 Publication date	28
F.11 Any other services provided by the issuer	28
F.12 Language or languages of the crypto-asset white paper	28
F.13 Digital token identifier code used to uniquely identify the crypto-asset the several crypto assets to which the white paper relates, where available	
F.14 Functionally fungible group digital token identifier, where available	28
F.15 Voluntary data flag	28
F.16 Personal data flag	28
F.17 LEI eligibility	28
F.18 Home Member State	28

F.19 Host Member States	29
art G – Information on the rights and obligations attached to the crypto-assets	29
G.1 Purchaser rights and obligations	29
G.2 Exercise of rights and obligations	29
G.3 Conditions for modifications of rights and obligations	29
G.4 Future public offers	29
G.5 Issuer retained crypto-assets	29
G.6 Utility token classification	29
G.7 Key features of goods/services of utility tokens	29
G.8 Utility tokens redemption	30
G.9 Non-trading request	30
G.10 Crypto-assets purchase or sale modalities	30
G.11 Crypto-assets transfer restrictions	30
G.12 Supply adjustment protocols	30
G.13 Supply adjustment mechanisms	30
G.14 Token value protection schemes	30
G.15 Token value protection schemes description	30
G.16 Compensation schemes	31
G.17 Compensation schemes description	31
G.18 Applicable law	31
G.19 Competent court	31
art H – information on the underlying technology	31
H.1 Distributed ledger technology (DTL)	31
H.2 Protocols and technical standards	

	H.3 Technology used	32
	H.4 Consensus mechanism	33
	H.5 Incentive mechanisms and applicable fees	35
	H.6 Use of distributed ledger technology	37
	H.7 DLT functionality description	37
	H.8 Audit	37
	H.9 Audit outcome	37
P	art I – Information on risks	37
	I.1 Offer-related risks	37
	I.2 Issuer-related risks	39
	I.3 Crypto-assets-related risks	40
	I.4 Project implementation-related risks	45
	I.5 Technology-related risks	45
	I.6 Mitigation measures	46
P	art J – Information on the sustainability indicators in relation to adverse impact on	the
cl	imate and other environment-related adverse impacts	46
	J.1 Adverse impacts on climate and other environment-related adverse impacts	46
	S.1 Name	46
	S.2 Relevant legal entity identifier	46
	S.3 Name of the cryptoasset	46
	S.4 Consensus Mechanism	47
	S.5 Incentive Mechanisms and Applicable Fees	49
	S.6 Beginning of the period to which the disclosure relates	50
	S.7 End of the period to which the disclosure relates	50
	S.8 Energy consumption	50

S.9 Energy consumption sources and methodologies	50
S.10 Renewable energy consumption	.51
S.11 Energy intensity	.51
S.12 Scope 1 DLT GHG emissions – Controlled	.51
S.13 Scope 2 DLT GHG emissions – Purchased	.51
S.14 GHG intensity	.51
S.15 Key energy sources and methodologies	.51
S.16 Key GHG sources and methodologies	.51



01. Date of notification

2025-03-31

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 of the European Parliament and of the Council 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 omissions likely to affect its import.

04. Statement in accordance with Article 6(5), points (a), (b), (c), of Regulation (EU) 2023/1114

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

05. Statement in accordance with Article 6(5), point (d), of Regulation (EU) 2023/1114

The token has no utility other than being holdable and transferable and can not be exchanged for any goods or services at the time of writing this white paper (2025-03-08).

06. Statement in accordance with Article 6(5), points (e) and (f), of Regulation (EU) 2023/1114

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

Summary

07. Warning in accordance with Article 6(7), second subparagraph, of Regulation (EU) 2023/1114

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 or any other offer document pursuant to union or national law.

08. Characteristics of the crypto-asset

OFFICIAL TRUMP tokens this white paper refers to are crypto-assets other than EMTs and ARTs, which are currently available on the Solana blockchain (at the time of writing this white paper (2025-03-08) and according to DTI FFG shown in F.14). As outlined on the project's website (https://gettrumpmemes.com/, accessed at 2025-03-08), the total supply is 1,000,000,000 tokens, scheduled for release over three years. The initial production of the tokens (the so-called "mint") took place on January 17, 2025 14:01:48 +UTC (see transaction hash: https://solscan.io/tx/UFec7orzRrt17gDr6NpB1dNGwoKBSHyyEww94KJcZa4gFNYTBH2yW



PVZDB4L5Gp4jsrPs9efwxWGdqGai4XKWtG). As outlined on the project's website (https://gettrumpmemes.com/, accessed at 2025-03-08) at the initial mint, 200,000,000 tokens were fully unlocked. The remaining 800,000,000 tokens are set to be gradually released over the next 36 months after the date of initial mint. According to the statements made on the beforementioned website, CIC Digital LLC, an affiliate of The Trump Organization, and Fight Fight Fight LLC collectively own 80% of the Trump Cards, subject to a 3-year unlocking schedule. It is also stated on the website that these tokens are subject to lock-up periods ranging from 3 to 12 months and will subsequently be unlocked linearly over a 24-month period. The remaining tokens are said to be allocated with 10% reserved for liquidity and 10% for public distribution, which were fully unlocked at launch.

The tokens have no inherent rights or utility - apart from being holdable and transferable and can not be exchanged for any goods or services at the time of writing this white paper (2025-03-08).

09. Information about the quality and quantity of goods or services to which the utility tokens give access and restrictions on the transferability

Since holding the crypto-asset does not grant access to any goods or services, this is not applicable at the time of writing this white paper (2025-03-08).

10. Key information about the offer to the public or admission to trading

Crypto Risk Metrics GmbH is seeking admission to trading on any Crypto Asset Service Provider platform in the European Union in accordance to Article 5 of REGULATION (EU) 2023/1114 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 31 May 2023 on markets in crypto-assets, and amending Regulations (EU) No 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937. In accordance to Article 5(4), this crypto-asset white paper may be used by entities admitting the token to trading after Crypto Risk Metrics GmbH as the person responsible for drawing up such white paper



has given its consent to its use in writing to the repective Crypto Asset Service Provider. If a CASP wishes to use this white paper, inquiries can be made under info@crypto-riskmetrics.com.

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

A.1 Name

Crypto Risk Metrics GmbH

A.2 Legal form

2HBR

A.3 Registered address

DE, Lange Reihe 73, 20099 Hamburg, Germany

A.4 Head office

Not applicable.

A.5 Registration date

2018-12-03

A.6 Legal entity identifier

39120077M9TG0O1FE242

A.7 Another identifier required pursuant to applicable national law

Crypto Risk Metrics GmbH is registered with the commercial register in the city of Hamburg, Germany, under number HRB 154488.

A.8 Contact telephone number

+4915144974120

A.9 E-mail address

info@crypto-risk-metrics.com



A.10 Response time (Days)

030

A.11 Parent company

Not applicable.

A.12 Members of the management body

Name	Position	Address
Dr. Sven Hildebrandt	Chairman	Lange Reihe 73, 20099 Hamburg, Germany

A.13 Business activity

Crypto Risk Metrics GmbH is a technical service provider, who supports regulated entities in the fulfillment of their regulatory requirements. In this regard, Crypto Risk Metrics GmbH acts as a data-provider for ESG-data according to article 66 (5). Due to the regulations laid out in article 5 (4) of the REGULATION (EU) 2023/1114 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 31 May 2023 on markets in crypto-assets, and amending Regulations (EU) No 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937, Crypto Risk Metrics GmbH aims at providing central services for crypto-asset white papers in order to minimize market confusion due to conflicting white papers for the same asset.

A.14 Parent company business activity

Not applicable.

A.15 Newly established

Crypto Risk Metrics GmbH has been etablished since 2018 and is therefore not newly established (i. e. older than three years).

A.16 Financial condition for the past three years

Crypto Risk Metrics GmbH's profit after tax for the last three financial years are as follows:



2024 (unaudited): negative 50.891,81 EUR

2023 (unaudited): negative 27.665,32 EUR

2022: 104.283,00 EUR.

As 2023 and 2024 were the years building Software for the MiCAR-Regulation which was not yet in place, revenue streams from these investments are expected to be generated in 2025.

A.17 Financial condition since registration

This point would only be applicable if the company were newly established and the financial conditions for the past three years had not been provided in the bulletpoint before.

Part B – Information about the issuer, if different from the offeror or person seeking admission to trading

B.1 Issuer different from offeror or person seeking admission to trading

Yes

B.2 Name

Fight Fight Fight LLC

B.3 Legal form

HZEH, Limited Liability Company

B4. Registered address

US, 251 Little Falls Drive, Wilmington, DE 19808, +302-636-540

B.5 Head office

US, 516 S. Dixie Hwy. Suite 195, West Palm Beach, FL 33401, as stated on the website: https://gettrumpmemes.com/.



B.6 Registration date

2025-01-07

B.7 Legal entity identifier

A legal identifier was not available at the time of writing this white paper (2025-03-08).

B.8 Another identifier required pursuant to applicable national law

Not applicable.

B.9 Parent company

Due to publicly unavailable corporate documents, the parent company or companies of Fight Fight LLC could not be determined with certainty at the time of writing this white paper (2025-03-08). On the website https://gettrumpmemes.com/, the companies CIC Digital LLC and Celebration Cards LLC are named as owners of the Fight Fight Fight LLC. But again, this information could not be verified. CIC Digital LLC was incorporated 2022-03-01 and is registered under file number 664661 at US, 251 Little Falls Drive, Wilmington, DE 19808, +302-636-5401. Celebration Cards LLC is was incorporated 1999-06-03 and is registered under entity ID: 2391597 in the State of New York.

B.10 Members of the management body

Due to publicly unavailable corporate documents, the members of the management body of Fight Fight LLC could not be identified.

B.11 Business activity

Due to publicly unavailable corporate documents, the business activity of Fight Fight Fight LLC could not be identified.

B.12 Parent company business activity

Due to publicly unavailable corporate documents, the business activity of the parent company/companies of Fight Fight Fight LLC could not be identified.



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

C.1 Name

Not applicable.

C.2 Legal form

Not applicable.

C.3 Registered address

Not applicable.

C.4 Head office

Not applicable.

C.5 Registration date

Not applicable.

C.6 Legal entity identifier

Not applicable.

C.7 Another identifier required pursuant to applicable national law

Not applicable.

C.8 Parent company

Not applicable.

C.9 Reason for crypto-Asset white paper Preparation

Not applicable.



C.10 Members of the Management body

Not applicable.

C.11 Operator business activity

Not applicable.

C.12 Parent company business activity

Not applicable.

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

Not applicable.

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

Not applicable.

Part D – Information about the crypto-asset project

D.1 Crypto-asset project name

Long Name: "OFFICIAL TRUMP", Short Name: "TRUMP" according to the Digital Token Identifier Foundation (www.dtif.org, DTI see F.13, FFG DTI see F.14 as of 2025-03-01).

D.2 Crypto-assets name

See F.13.

D.3 Abbreviation

See F.13.

D.4 Crypto-asset project description

As outlined on the project's website (https://gettrumpmemes.com/, accessed at 2025-03-08), the crypto-asset is intended to function as an expression of support for, and engagement with, the ideals and beliefs embodied by the symbol "\$TRUMP" and the

associated artwork, and the tokens issued are not intended to be, or to be the subject of, an investment opportunity, investment contract, or security of any type.

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

Name	Role
DTTM Operations LLC	Holder of TRUMP trademark according to the project's website (https://gettrumpmemes.com/, accessed at 2025-03-08)
Celebration Cards LLC	Uses the "TRUMP" name and the name, image and likeness of Donald J. Trump pursuant to the terms of a limited license agreement which may be terminated or revoked according to its terms according to the project's website (https://gettrumpmemes.com/, accessed at 2025-03-08)
Fight Fight LLC	Offerer if the website, as stated in the Terms and Conditions (https://gettrumpmemes.com/, accessed at 2025-03-08)
CIC Digital LLC	Affiliate of The Trump Organization (https://gettrumpmemes.com/, accessed at 2025-03-08)
Others	More information was not available on the project related website



(https://gettrumpmemes.com/,	accessed
at 2025-03-08)	

D.6 Utility Token Classification

The token does not classify as a utility token.

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

Not applicable.

D.8 Plans for the token

Other than the already stated milestones in point 8 of this crypto-asset white paper, no other information was stated on the website https://gettrumpmemes.com/, accessed at 2025-03-08.

D.9 Resource allocation

No information was available for this crypto-asset on the website https://gettrumpmemes.com/, accessed at 2025-03-08.

D.10 Planned use of Collected funds or crypto-Assets

No information was available for this crypto-asset on the website https://gettrumpmemes.com/, accessed at 2025-03-08.

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

E.1 Public offering or admission to trading

The white paper concerns the admission to trading (i. e. ATTR) on any Crypto Asset Service Providers platform that has obtained the written consent of Crypto Risk Metrics GmbH as the person drafting this white paper.

E.2 Reasons for public offer or admission to trading

As already stated in A.13, Crypto Risk Metrics GmbH aims to provide central services to draw up crypto-asset white papers in accordance to COMMISSION IMPLEMENTING



REGULATION (EU) 2024/2984. These services are offered in order to minimize market confusion due to conflicting white papers for the same asset drawn up from different Crypto Asset Service Providers. As of now, such a scenario seems highly likely as a Crypto Asset Service Provider who drew up a crypto-asset white paper and admitted the respective token in the Union has no incentive to give his written consent to another Crypto Asset Service Provider according to Article 5 (4 b) of the REGULATION (EU) 2023/1114 to use the white paper for his regulatory obligations, as this would 1. strenghthen the market-positioning of the other Crypto Asset Service Provider (who is most likely a competitor) and 2. also entail liability risks.

E.3 Fundraising target

Not applicable.

E.4 Minimum subscription goals

Not applicable.

E.5 Maximum subscription goals

Not applicable.

E.6 Oversubscription acceptance

Not applicable.

E.7 Oversubscription allocation

Not applicable.

E.8 Issue price

Not applicable.

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

Not applicable, as this white paper is written to support admission to trading and not for the initial offer to the public.



E.10 Subscription fee

Not applicable, as this white paper is written to support admission to trading and not for the initial offer to the public.

E.11 Offer price determination method

Once the token is admitted to trading its price will be determined by demand (buyers) and supply (sellers).

E.12 Total number of offered/traded crypto-assets

100000000

E.13 Targeted holders

ALL

E.14 Holder restrictions

The Holder restrictions are subject to the rules applicable to the Crypto Asset Service Provider as well as additional restrictions the Crypto Asset Service Providers might set in force.

E.15 Reimbursement notice

Not applicable.

E.16 Refund mechanism

Not applicable.

E.17 Refund timeline

Not applicable.

E.18 Offer phases

Not applicable.

E.19 Early purchase discount

Not applicable.



E.20 Time-limited offer

Not applicable.

E.21 Subscription period beginning

Not applicable.

E.22 Subscription period end

Not applicable.

E.23 Safeguarding arrangements for offered funds/crypto- Assets

Not applicable.

E.24 Payment methods for crypto-asset purchase

The payment methods are subject to the respective capabilities of the Crypto Asset Service Provider listing the crypto-asset.

E.25 Value transfer methods for reimbursement

Not applicable.

E.26 Right of withdrawal

Not applicable, as this white paper is written to support admission to trading and not for the initial offer to the public.

E.27 Transfer of purchased crypto-assets

The transfer of purchased crypto-assets are subject to the respective capabilities of the Crypto Asset Service Provider listing the crypto-asset.

E.28 Transfer time schedule

Not applicable, as this white paper is written to support admission to trading and not for the initial offer to the public.



E.29 Purchaser's technical requirements

The technical requirements that the purchaser is required to fulfil to hold the cryptoassets of purchased crypto-assets are subject to the respective capabilities of the Crypto Asset Service Provider listing the crypto-asset.

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

Not applicable.

E.31 CASP identifier

Not applicable.

E.32 Placement form

Not applicable.

E.33 Trading platforms name

The trading on all MiCAR-compliant trading platforms is sought.

E.34 Trading platforms Market identifier code (MIC)

Not applicable.

E.35 Trading platforms access

This depends on the trading platform listing the asset.

E.36 Involved costs

This depends on the trading platform listing the asset. Furthermore, costs may occur for making transfers out of the platform (i. e. "gas costs" for blockchain network use that may exceed the value of the crypto-asset itself).

E.37 Offer expenses

Not applicable, as this crypto-asset white paper concerns the admission to trading and not the offer of the token to the public.



E.38 Conflicts of interest

MiCAR-compliant Crypto Asset Service Providers shall have strong measurements in place in order to manage conflicts of interests. Due to the broad audience this white-paper is adressing, potential investors should always check the conflicts of Interest policy of their respective counterparty.

E.39 Applicable law

Not applicable, as it is referred to on "offer to the public" and in this white-paper, the admission to trading is sought.

E.40 Competent court

Not applicable, as it is referred to on "offer to the public" and in this white-paper, the admission to trading is sought.

Part F – Information about the crypto-assets

F.1 Crypto-asset type

The crypto-asset described in the white paper is classified as a crypto-asset under the Markets in Crypto-Assets Regulation (MiCAR) but does not qualify as an electronic money token (EMT) or an asset-referenced token (ART). It is a digital representation of value that can be stored and transferred using distributed ledger technology (DLT) or similar technology, without embodying or conferring any rights to its holder.

The asset does not aim to maintain a stable value by referencing an official currency, a basket of assets, or any other underlying rights. Instead, its valuation is entirely marketdriven, based on supply and demand dynamics, and not supported by a stabilization mechanism. It is neither pegged to any fiat currency nor backed by any external assets, distinguishing it clearly from EMTs and ARTs.

Furthermore, the crypto-asset is not categorized as a financial instrument, deposit, insurance product, pension product, or any other regulated financial product under EU law. It does not grant financial rights, voting rights, or any contractual claims to its holders,



ensuring that it remains outside the scope of regulatory frameworks applicable to traditional financial instruments.

F.2 Crypto-asset functionality

There is none, other than the ability to hold and transfer the crypto-asset.

F.3 Planned application of functionalities

All functionalities referred to in F.2 have already been applied. There were no statements made to further functionalities for the token on the website https://gettrumpmemes.com as of 2025-03-08.

A description of the characteristics of the crypto asset, including the data necessary for classification of the crypto-asset white paper in the register referred to in Article 109 of Regulation (EU) 2023/1114, as specified in accordance with paragraph 8 of that Article

F.4 Type of crypto-asset white paper

The white paper type is "other crypto-assets" (i. e. "OTHR").

F.5 The type of submission

The white paper submission type is "NEWT", which stands for new token.

F.6 Crypto-asset characteristics

The tokens are crypto-assets other than EMTs and ARTs, which are available on the Solana blockchain. The tokens are fungible (up to 6 digits after the decimal point), and a total of 1,000,000,000 have already been issued. The tokens are a digital representation of value, and have no inherent rights attached as well as no intrinsic utility.

F.7 Commercial name or trading name

See F.13.

F.8 Website of the issuer

https://gettrumpmemes.com



F.9 Starting date of offer to the public or admission to trading

2025-03-31

F.10 Publication date

2025-03-31

F.11 Any other services provided by the issuer

The issuer of the token is a US-based entity and due to the lack of publicly available information and resources while drawing up this white paper (2025-02-28) it is not possible to exclude a possibility that the issuer of the token provides or will provide other services not covered by Regulation (EU) 2023/1114 (i.e. MiCAR).

F.12 Language or languages of the crypto-asset white paper

ΕN

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

3R313RR9C

F.14 Functionally fungible group digital token identifier, where available

LJDPGNXXK

F.15 Voluntary data flag

Mandatory.

F.16 Personal data flag

The white paper does contain personal data.

F.17 LEI eligibility

The issuer should be eligible for a Legal Entity Identifier.

F.18 Home Member State

Germany



F.19 Host Member States

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

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

G.1 Purchaser rights and obligations

There are no rights or obligations attached for/of the purchaser.

G.2 Exercise of rights and obligations

As the token grants neither rights nor obligations, there are no procedures and conditions for the exercise of these rights applicable.

G.3 Conditions for modifications of rights and obligations

As the token grants neither rights nor obligations, there are no conditions under which the rights and obligations may be modified applicable.

G.4 Future public offers

Information on the future offers to the public of crypto-assets were not available at the time of writing this white paper (2025-03-08).

G.5 Issuer retained crypto-assets

80000000

G.6 Utility token classification

No

G.7 Key features of goods/services of utility tokens

As the crypto-asset grants no access to neither goods nor services this information is not applicable.



G.8 Utility tokens redemption

Not applicable.

G.9 Non-trading request

The admission to trading is sought.

G.10 Crypto-assets purchase or sale modalities

Not applicable, as the admission to trading of the tokens is sought.

G.11 Crypto-assets transfer restrictions

The crypto-assets as such do not have any transfer restrictions and are generally freely transferable. The Crypto Asset Service Providers can impose their own restrictions in agreements they enter with their clients. The Crypto Asset Service Providers may impose restrictions to buyers and sellers in accordance with applicable laws and internal policies and terms.

G.12 Supply adjustment protocols

No, there are no fixed protocols that can increase or decrease the supply implemented as of 2025-03-08. Furthermore, the supply cannot be increased because mint authority for the token was permanently forfeited. Tokens can be burned by any user.

G.13 Supply adjustment mechanisms

The mint authority (the entity who can create new tokens of that crypto-asset), as stated in the mint's data account, has the potential right to change the supply of the cryptoassets. However, since the mint authority was forfeited, it should not be possible to increase the token supply, however the whole data account could be updated which then in turn could lead to a situation that total suppy could be altered again.

G.14 Token value protection schemes

No, the token does not have value protection schemes.

G.15 Token value protection schemes description

Not applicable.



G.16 Compensation schemes

No, the token does not have compensation schemes.

G.17 Compensation schemes description

Not applicable.

G.18 Applicable law

Applicable law likely depends on the location of any particular transaction with the token.

G.19 Competent court

Competent court likely depends on the location of any particular transaction with the token.

Part H – information on the underlying technology

H.1 Distributed ledger technology (DTL)

See F.13.

H.2 Protocols and technical standards

The tokens were created with Solana's Token Program, a smart contract that is part of the Solana Program Library (SPL). Such tokens are commonly referred to as SPL-token. The token itself is not an additional smart contract, but what is called a data account on Solana. As the name suggests data accounts store data on the blockchain. However, unlike smart contracts, they cannot be executed and cannot perform any operations. Since one cannot interact with data accounts directly, any interaction with an SPL-token is done via Solana's Token Program. The source code of this smart contract can be found here https://github.com/solana-program/token.

The Token Program is developed in Rust, a memory-safe, high-performance programming language designed for secure and efficient development. On Solana, Rust is said to be the primary language used for developing on-chain programs (smart contracts), intended to ensure safety and reliability in decentralized applications (dApps).

Core functions of the Token Program:



initialize_mint() \rightarrow Create a new type of token, called a mint

mint_to() \rightarrow Mints new tokens of a specific type to a specified account

burn() \rightarrow Burns tokens from a specified account, reducing total supply

transfer() \rightarrow Transfers tokens between accounts

approve() \rightarrow Approves a delegate to spend tokens on behalf of the owner

set_authority() \rightarrow Updates authorities (mint, freeze, or transfer authority)

These functions ensure basic operations like transfers, and minting/burning can be performed within the Solana ecosystem.

In addition to the Token Program, another smart contract, the Metaplex Token Metadata Program is commonly used to store name, symbol, and URI information for better ecosystem compatibility. This additional metadata has no effect on the token's functionality.

H.3 Technology used

1. Solana-Compatible Wallets: The tokens are supported by all wallets compatible with Solana's Token Program

2. Decentralized Ledger: The Solana blockchain acts as a decentralized ledger for all token transactions, with the intention to preserving an unalterable record of token transfers and ownership to ensure both transparency and security.

3. SPL Token Program: The SPL (Solana Program Library) Token Program is an inherent Solana smart contract built to create and manage new types of tokens (so called mints). This is significantly different from ERC-20 on Ethereum, because a single smart contract that is part of Solana's core functionality and as such is open source, is responsible for all the tokens. This ensures a high uniformity across tokens at the cost of flexibility.



4. Blockchain Scalability: With its intended capacity for processing a lot of transactions per second and in most cases low fees, Solana is intended to enable efficient token transactions, maintaining high performance even during peak network usage.

Security Protocols for Asset Custody and Transactions:

1. Private Key Management: To safeguard their token holdings, users must securely store their wallet's private keys and recovery phrases.

2. Cryptographic Integrity: Solana employs elliptic curve cryptography to validate and execute transactions securely, intended to ensure the integrity of all transfers.

H.4 Consensus mechanism

Solana uses a combination of Proof of History (PoH) and Proof of Stake (PoS). The core concepts of the mechanism are intended to work as follows:

Core Concepts

1. Proof of History (PoH):

Time-Stamped Transactions: PoH is a cryptographic technique that timestamps transactions, intended to creating a historical record that proves that an event has occurred at a specific moment in time.

Verifiable Delay Function: PoH uses a Verifiable Delay Function (VDF) to generate a unique hash that includes the transaction and the time it was processed. This sequence of hashes provides a verifiable order of events, intended to enabling the network to efficiently agree on the sequence of transactions.

2. Proof of Stake (PoS):

Validator Selection: Validators are chosen to produce new blocks based on the number of SOL tokens they have staked. The more tokens staked, the higher the chance of being selected to validate transactions and produce new blocks.

Delegation: Token holders can delegate their SOL tokens to validators, earning rewards proportional to their stake while intended to enhancing the network's security.



Consensus Process

1. Transaction Validation:

Transactions are broadcasted to the network and collected by validators. Each transaction is validated to ensure it meets the network's criteria, such as having correct signatures and sufficient funds.

2. PoH Sequence Generation:

A validator generates a sequence of hashes using PoH, each containing a timestamp and the previous hash. This process creates a historical record of transactions, establishing a

cryptographic clock for the network.

3. Block Production:

The network uses PoS to select a leader validator based on their stake. The leader is responsible for bundling the validated transactions into a block. The leader validator uses the PoH sequence to order transactions within the block, ensuring that all transactions are processed in the correct order.

4. Consensus and Finalization:

Other validators verify the block produced by the leader validator. They check the correctness of the PoH sequence and validate the transactions within the block. Once the block is verified, it is added to the blockchain. Validators sign off on the block, and it is considered finalized.

Security and Economic Incentives

1. Incentives for Validators:

Block Rewards: Validators earn rewards for producing and validating blocks. These rewards are distributed in SOL tokens and are proportional to the validator's stake and performance.

Transaction Fees: Validators also earn transaction fees from the transactions included in the blocks they produce. These fees provide an additional incentive for validators to process transactions efficiently.

2. Security:

Staking: Validators must stake SOL tokens to participate in the consensus process. This staking acts as collateral, incentivizing validators to act honestly. If a validator behaves maliciously or fails to perform, they risk losing their staked tokens.

Delegated Staking: Token holders can delegate their SOL tokens to validators, intended to enhance network security and decentralization. Delegators share in the rewards and are incentivized to choose reliable validators.

3. Economic Penalties:

Slashing: Validators can be penalized for malicious behavior, such as double-signing or producing invalid blocks. This penalty, known as slashing, results in the loss of a portion of the staked tokens, discouraging dishonest actions.

H.5 Incentive mechanisms and applicable fees

1. Validators:

Staking Rewards: Validators are chosen based on the number of SOL tokens they have staked. They earn rewards for producing and validating blocks, which are distributed in SOL. The more tokens staked, the higher the chances of being selected to validate transactions and produce new blocks.

Transaction Fees: Validators earn a portion of the transaction fees paid by users for the transactions they include in the blocks. This is intended to provide an additional financial incentive for validators to process transactions efficiently and maintain the network's integrity.

2. Delegators:

Delegated Staking: Token holders who do not wish to run a validator node can delegate their SOL tokens to a validator. In return, delegators share the rewards earned by the



validators. This is intended to encourage widespread participation in securing the network and ensures decentralization.

3. Economic Security:

Slashing: Validators can be penalized for malicious behavior, such as producing invalid blocks or being frequently offline. This penalty, known as slashing, involves the loss of a portion of their staked tokens. Slashing is intended to deter dishonest actions and ensures that validators act in the best interest of the network.

Opportunity Cost: By staking SOL tokens, validators and delegators lock up their tokens, which could otherwise be used or sold. This opportunity cost is intended to incentivize participants to act honestly to earn rewards and avoid penalties.

Fees Applicable on the Solana Blockchain

1. Transaction Fees:

Solana is designed to handle a high throughput of transactions, which is intended to keep the fees low and predictable.

Fee Structure: Fees are paid in SOL and are used to compensate validators for the resources they expend to process transactions. This includes computational power and network bandwidth.

2. Rent Fees:

State Storage: Solana charges so called ""rent fees"" for storing data on the blockchain. These fees are designed to discourage inefficient use of state storage and encourage developers to clean up unused state. Rent fees are intended to help maintain the efficiency and performance of the network.

3. Smart Contract Fees:

Execution Costs: Similar to transaction fees, fees for deploying and interacting with smart contracts on Solana are based on the computational resources required. This is intended to ensure that users are charged proportionally for the resources they consume.



H.6 Use of distributed ledger technology

No, DLT is neither operated by the issuer nor a third party acting on the issuer's behalf.

H.7 DLT functionality description

Not applicable.

H.8 Audit

As we are understanding the question relating to "technology" to be interpreted in a broad sense, the answer answer to whether an audit of "the technology used" was conducted is "no, we can not guarantee, that all parts of the technology used have been audited". This is due to the fact this report focusses on risk, and we can not guarantee that each part of the technology used was audited.

H.9 Audit outcome

Not applicable.

Part I – Information on risks

I.1 Offer-related risks

1. Regulatory and Compliance

This white paper (drawn up from 2025-02-20-2025-03-15) has been prepared with utmost caution; however, uncertainties in the regulatory requirements and future changes in regulatory frameworks could potentially impact the token's legal status and its tradability. There is also a high probability that other laws will come into force, changing the rules for the trading of the token. Therefore, such developments shall be monitored and acted upon accordingly.

2. Operational and Technical

Blockchain Dependency: The token is entirely dependent on the blockchain the cryptoasset is issued upon (as of 2025-03-01). Any issues, such as downtime, congestion, or security vulnerabilities within the blockchain, could adversely affect the token's functionality.

Smart Contract Risks: Smart contracts governing the token may contain hidden vulnerabilities or bugs that could disrupt the token offering or distribution processes.

Connection Dependency: As the trading of the token also involves other trading venues, technical risks such as downtime of the connection or faulty code are also possible.

Human errors: Due to the irrevocability of blockchain-transactions, approving wrong transactions or using incorrect networks/addresses will most likely result in funds not being accessibly anymore.

Custodial risk: When admitting the token to trading, the risk of losing clients assets due to hacks or other malicious acts is given. This is due to the fact the token is hold in custodial wallets for the customers.

3. Market and Liquidity

Volatility: The token will most likely be subject to high volatility and market speculation. Price fluctuations could be significant, posing a risk of substantial losses to holders.

Liquidity Risk: Liquidity is contingent upon trading activity levels on decentralized exchanges (DEXs) and potentially on centralized exchanges (CEXs), should they be involved. Low trading volumes may restrict the buying and selling capabilities of the tokens.

4. Counterparty

As the admission to trading involves the connection to other trading venues, counterparty risks arise. These include, but are not limited to, the following risks:

General Trading Platform Risk: The risk of trading platforms not operating to the highest standards is given. Examples like FTX show that especially in nascent industries, compliance and oversight-frameworks might not be fully established and/or enforced.

Listing or Delisting Risks: The listing or delisting of the token is subject to the trading partners internal processes. Delisting of the token at the connected trading partners could harm or completely halt the ability to trade the token.

5. Liquidity

Liquidity of the token can vary, especially when trading activity is limited. This could result in high slippage when trading a token.

6. Failure of one or more Counterparties

Another risk stems from the internal operational processes of the counterparties used. As there is no specific oversight other than the typical due diligence check, it cannot be guaranteed that all counterparties adhere to the best market standards.

Bankruptcy Risk: Counterparties could go bankrupt, possibly resulting in a total loss for the clients assets hold at that counterparty.

I.2 Issuer-related risks

1. Insolvency

As with every other commercial endeavor, the risk of insolvency of the issuer is given. This could be caused by but is not limited to lack of interest from the public, lack of funding, incapacitation of key developers and project members, force majeure (including pandemics and wars) or lack of commercial success or prospects.

2. Counterparty

In order to operate, the issuer has most likely engaged in different business relationships with one or more third parties on which it strongly depends on. Loss or changes in the leadership or key partners of the issuer and/or the respective counterparties can lead to disruptions, loss of trust, or project failure. This could result in a total loss of economic value for the crypto-asset holders.

3. Legal and Regulatory Compliance

Cryptocurrencies and blockchain-based technologies are subject to evolving regulatory landscapes worldwide. Regulations vary across jurisdictions and may be subject to significant changes. Non-compliance can result in investigations, enforcement actions, penalties, fines, sanctions, or the prohibition of the trading of the crypto-asset impacting its viability and market acceptance. This could also result in the issuer to be subject to private litigation. The beforementioned would most likely also lead to changes with

respect to trading of the crypto-asset that may negatively impact the value, legality, or functionality of the crypto-asset.

4. Operational

Failure to develop or maintain effective internal control, or any difficulties encountered in the implementation of such controls, or their improvement could harm the issuer's business, causing disruptions, financial losses, or reputational damage.

5. Industry

The issuer is and will be subject to all of the risks and uncertainties associated with a memecoin-project, where the token issued has zero intrinsic value. History has shown that most of this projects resulted in financial losses for the investors and were only setup to enrich a few insiders with the money from retail investors.

6. Reputational

The issuer faces the risk of negative publicity, whether due to, without limitation, operational failures, security breaches, or association with illicit activities, which can damage the issuer reputation and, by extension, the value and acceptance of the crypto-asset.

7. Competition

There are numerous other crypto-asset projects in the same realm, which could have an effect on the crypto-asset in question.

8. Unanticipated Risk

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.

I.3 Crypto-assets-related risks

1. Valuation

As the crypto-asset does not have any intrinsic value, and grants neither rights nor obligations, the only mechanism to determine the price is supply and demand. Historically, most crypto-assets have dramatically lost value and were not a beneficial investment for the investors. Therefore, investing in these crypto-assets poses a high risk, and the loss of funds can occur.

2. Market Volatility

Crypto-asset prices are highly susceptible to dramatic fluctuations influence by various factors, including market sentiment, regulatory changes, technological advancements, and macroeconomic conditions. These fluctuations can result in significant financial losses within short periods, making the market highly unpredictable and challenging for investors. This is especially true for crypto-assets without any intrinsic value, and investors should be prepared to lose the complete amount of money invested in the respective crypto-assets.

3. Liquidity Challenges

Some crypto-assets suffer from limited liquidity, which can present difficulties when executing large trades without significantly impacting market prices. This lack of liquidity can lead to substantial financial losses, particularly during periods of rapid market movements, when selling assets may become challenging or require accepting unfavorable prices.

4. Asset Security

Crypto-assets face unique security threats, including the risk of theft from exchanges or digital wallets, loss of private keys, and potential failures of custodial services. Since crypto transactions are generally irreversible, a security breach or mismanagement can result in the permanent loss of assets, emphasizing the importance of strong security measures and practices.

5. Scams

The irrevocability of transactions executed using blockchain infrastructure, as well as the pseudonymous nature of blockchain ecosystems, attracts scammers. Therefore,



investors in crypto-assets must proceed with a high degree of caution when investing in if they invest in crypto-assets. Typical scams include – but are not limited to – the creation of fake crypto-assets with the same name, phishing on social networks or by email, fake giveaways/airdrops, identity theft, among others.

6. Blockchain Dependency

Any issues with the blockchain used, such as network downtime, congestion, or security vulnerabilities, could disrupt the transfer, trading, or functionality of the crypto-asset.

7. Smart Contract Vulnerabilities

The smart contract used to issue the crypto-asset could include bugs, coding errors, or vulnerabilities which could be exploited by malicious actors, potentially leading to asset loss, unauthorized data access, or unintended operational consequences.

8. Privacy Concerns

All transactions on the blockchain are permanently recorded and publicly accessible, which can potentially expose user activities. Although addresses are pseudonoymous, the transparent and immutable nature of blockchain allows for advanced forensic analysis and intelligence gathering. This level of transparency can make it possible to link blockchain addresses to real-world identities over time, compromising user privacy.

9. Regulatory Uncertainty

The regulatory environment surrounding crypto-assets is constantly evolving, which can directly impact their usage, valuation, and legal status. Changes in regulatory frameworks may introduce new requirements related to consumer protection, taxation, and antimoney laundering compliance, creating uncertainty and potential challenges for investors and businesses operating in the crypto space. Although the crypto-asset do not create or confer any contractual or other obligations on any party, certain regulators may nevertheless qualify the crypto-asset as a security or other financial instrument under their applicable law, which in turn would have drastic consequences for the crypto-asset, including the potential loss of the invested capital in the asset. Furthermore, this could lead to the sellers and its affiliates, directors, and officers being obliged to pay fines,

including federal civil and criminal penalties, or make the crypto-asset illegal or impossible to use, buy, or sell in certain jurisdictions. On top of that, regulators could take action against the issuer as well as the trading platforms if the the regulators view the token as an unregistered offering of securities or the operations otherwise as a violation of existing law. Any of these outcomes would negatively affect the value and/or functionality of the crypot-asset and/or could cause a complete loss of funds of the invested money in the crypto-asset for the investor.

10. Counterparty risk

Engaging in agreements or storing crypto-assets on exchanges introduces counterparty risks, including the failure of the other party to fulfill their obligations. Investors may face potential losses due to factors such as insolvency, regulatory non-compliance, or fraudulent activities by counterparties, highlighting the need for careful due diligence when engaging with third parties.

11. Reputational concerns

Crypto-assets are often subject to reputational risks stemming from associations with illegal activities, high-profile security breaches, and technological failures. Such incidents can undermine trust in the broader ecosystem, negatively affecting investor confidence and market value, thereby hindering widespread adoption and acceptance.

12. Technological Innovation

New technologies or platforms could render Solana's design less competitive or even break fundamental parts (i.e., quantum computing might break cryptographic algorithms used to secure the network), impacting adoption and value. Participants should approach the crypto-asset with a clear understanding of its speculative and volatile nature and be prepared to accept these risks and bear potential losses, which could include the complete loss of the asset's value.

13. Community and Narrative

As the crypto-asset has no intrinsic value, all trading activity is based on the intended market value is heavily dependent on its community and the popularity of the memecoin



narrative. Declining interest or negative sentiment could significantly impact the token's value.

14. Interest Rate Change

Historically, changes in interest, foreign exchange rates, and increases in volatility have increased credit and market risks and may also affect the value of the crypto-asset. Although historic data does not predict the future, potential investors should be aware that general movements in local and other factors may affect the market, and this could also affect market sentiment and, therefore most likely also the price of the crypto-asset.

15. Taxation

The taxation regime that applies to the trading of the crypto-asset by individual holders or legal entities will depend on the holder's jurisdiction. It is the holder's sole responsibility to comply with all applicable tax laws, including, but not limited to, the reporting and payment of income tax, wealth tax, or similar taxes arising in connection with the appreciation and depreciation of the crypto-asset.

16. Anti-Money Laundering/Counter-Terrorism Financing

It cannot be ruled out that crypto-asset wallet addresses interacting with the crypto-asset have been, or will be used for money laundering or terrorist financing purposes, or are identified with a person known to have committed such offenses.

17. Market Abuse

It is noteworthy that crypto-assets are potentially prone to increased market abuse risks, as the underlying infrastructure could be used to exploit arbitrage opportunities through schemes such as front-running, spoofing, pump-and-dump, and fraud across different systems, platforms, or geographic locations. This is especially true for crypto-assets with a low market capitalization and few trading venues, and potential investors should be aware that this could lead to a total loss of the funds invested in the crypto-asset.

18. Timeline and Milestones



Critical project milestones could be delayed by technical, operational, or market challenges.

I.4 Project implementation-related risks

As this white paper relates to the "Admission to trading" of the crypto-asset, the implementation risk is referring to the risks on the Crypto Asset Service Providers side. These can be, but are not limited to, typical project management risks, such as key-personal-risks, timeline-risks, and technical implementation-risks.

I.5 Technology-related risks

As this white paper relates to the "Admission to trading" of the crypto-asset, the technology-related risks mainly lie in the settling on the Solana-Network.

1. Blockchain Dependency Risks

Solana Network Downtime: Potential outages or congestion on the Solana blockchain could interrupt on-chain token transfers, trading, and other functions.

Scalability Challenges: Despite Solana's comparatively high throughput design, unexpected demand or technical issues might compromise its performance.

2. Smart Contract Risks

Vulnerabilities: The smart contract governing the token could contain bugs or vulnerabilities that may be exploited, affecting token distribution or vesting schedules.

3. Wallet and Storage Risks

Private Key Management: Token holders must securely manage their private keys and recovery phrases to prevent permanent loss of access to their tokens, which includes Trading-Venues, who are a prominent target for dedicated hacks.

Compatibility Issues: The tokens require Solana-compatible wallets for storage and transfer. Any incompatibility or technical issues with these wallets could impact token accessibility.

4. Network Security Risks



Attack Risks: The Solana blockchain may face threats such as denial-of-service (DoS) attacks or exploits targeting its consensus mechanism, which could compromise network integrity.

Centralization Concerns: Although claiming to be decentralized, Solana's relatively smaller number of validators/concentration of stakes within the network compared to other blockchains and the influence of the Solana Foundation (as of 2025-03-09) might pose centralization risks, potentially affecting network resilience.

5. Evolving Technology Risks: Technological Obsolescence: The fast pace of innovation in blockchain technology may make Solana or the SPL token standard appear less competitive or become outdated, potentially impacting the usability or adoption of the token.

I.6 Mitigation measures

None.

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

S.1 Name

Crypto Risk Metrics GmbH

S.2 Relevant legal entity identifier

39120077M9TG0O1FE242

S.3 Name of the cryptoasset

OFFICIAL TRUMP



S.4 Consensus Mechanism

Solana uses a combination of Proof of History (PoH) and Proof of Stake (PoS). The core concepts of the mechanism are intended to work as follows:

Core Concepts

1. Proof of History (PoH):

Time-Stamped Transactions: PoH is a cryptographic technique that timestamps transactions, intended to creating a historical record that proves that an event has occurred at a specific moment in time.

Verifiable Delay Function: PoH uses a Verifiable Delay Function (VDF) to generate a unique hash that includes the transaction and the time it was processed. This sequence of hashes provides a verifiable order of events, intended to enabling the network to efficiently agree on the sequence of transactions.

2. Proof of Stake (PoS):

Validator Selection: Validators are chosen to produce new blocks based on the number of SOL tokens they have staked. The more tokens staked, the higher the chance of being

selected to validate transactions and produce new blocks.

Delegation: Token holders can delegate their SOL tokens to validators, earning rewards proportional to their stake while intended to enhancing the network's security.

Consensus Process

1. Transaction Validation:

Transactions are broadcasted to the network and collected by validators. Each transaction is validated to ensure it meets the network's criteria, such as having correct signatures and sufficient funds.

2. PoH Sequence Generation:

A validator generates a sequence of hashes using PoH, each containing a timestamp and the previous hash. This process creates a historical record of transactions, establishing a



cryptographic clock for the network.

3. Block Production:

The network uses PoS to select a leader validator based on their stake. The leader is responsible for bundling the validated transactions into a block. The leader validator uses the PoH sequence to order transactions within the block, ensuring that all transactions are processed in the correct order.

4. Consensus and Finalization:

Other validators verify the block produced by the leader validator. They check the correctness of the PoH sequence and validate the transactions within the block. Once the block is verified, it is added to the blockchain. Validators sign off on the block, and it is considered finalized.

Security and Economic Incentives

1. Incentives for Validators:

Block Rewards: Validators earn rewards for producing and validating blocks. These rewards are distributed in SOL tokens and are proportional to the validator's stake and performance.

Transaction Fees: Validators also earn transaction fees from the transactions included in the blocks they produce. These fees provide an additional incentive for validators to process transactions efficiently.

2. Security:

Staking: Validators must stake SOL tokens to participate in the consensus process. This staking acts as collateral, incentivizing validators to act honestly. If a validator behaves maliciously or fails to perform, they risk losing their staked tokens.

Delegated Staking: Token holders can delegate their SOL tokens to validators, intended to enhance network security and decentralization. Delegators share in the rewards and are incentivized to choose reliable validators.

3. Economic Penalties:

FFG: LJDPGNXXK - 2025-03-31



Slashing: Validators can be penalized for malicious behavior, such as double-signing or producing invalid blocks. This penalty, known as slashing, results in the loss of a portion of the staked tokens, discouraging dishonest actions.

S.5 Incentive Mechanisms and Applicable Fees

1. Validators:

Staking Rewards: Validators are chosen based on the number of SOL tokens they have staked. They earn rewards for producing and validating blocks, which are distributed in SOL. The more tokens staked, the higher the chances of being selected to validate transactions and produce new blocks.

Transaction Fees: Validators earn a portion of the transaction fees paid by users for the transactions they include in the blocks. This is intended to provide an additional financial incentive for validators to process transactions efficiently and maintain the network's integrity.

2. Delegators:

Delegated Staking: Token holders who do not wish to run a validator node can delegate their SOL tokens to a validator. In return, delegators share the rewards earned by the validators. This is intended to encourage widespread participation in securing the network and ensures decentralization.

3. Economic Security:

Slashing: Validators can be penalized for malicious behavior, such as producing invalid blocks or being frequently offline. This penalty, known as slashing, involves the loss of a portion of their staked tokens. Slashing is intended to deter dishonest actions and ensures that validators act in the best interest of the network.

Opportunity Cost: By staking SOL tokens, validators and delegators lock up their tokens, which could otherwise be used or sold. This opportunity cost is intended to incentivize participants to act honestly to earn rewards and avoid penalties.

Fees Applicable on the Solana Blockchain



1. Transaction Fees:

Solana is designed to handle a high throughput of transactions, which is intended to keep the fees low and predictable.

Fee Structure: Fees are paid in SOL and are used to compensate validators for the resources they expend to process transactions. This includes computational power and network bandwidth.

2. Rent Fees:

State Storage: Solana charges so called ""rent fees"" for storing data on the blockchain. These fees are designed to discourage inefficient use of state storage and encourage developers to clean up unused state. Rent fees are intended to help maintain the efficiency and performance of the network.

3. Smart Contract Fees:

Execution Costs: Similar to transaction fees, fees for deploying and interacting with smart contracts on Solana are based on the computational resources required. This is intended to ensure that users are charged proportionally for the resources they consume.

S.6 Beginning of the period to which the disclosure relates

2024-03-21

S.7 End of the period to which the disclosure relates

2025-03-21

S.8 Energy consumption

2112.83580 kWh/a

S.9 Energy consumption sources and methodologies

The energy consumption of this asset is aggregated across multiple components:

To determine the energy consumption of a token, the energy consumption of the network Solana is calculated first. Based on the crypto asset's gas consumption per network, the share of the total consumption of the respective network that is assigned to this asset is



defined. When calculating the energy consumption, we used - if available - the Functionally Fungible Group Digital Token Identifier (FFG DTI) to determine all implementations of the asset of question in scope and we update the mappings regulary, based on data of the Digital Token Identifier Foundation.

S.10 Renewable energy consumption

14.7702082420 %

S.11 Energy intensity

0.00000 kWh

S.12 Scope 1 DLT GHG emissions – Controlled

0.00000 tCO2e/a

S.13 Scope 2 DLT GHG emissions – Purchased

0.73761 tCO2e/a

S.14 GHG intensity

0.00000 kgCO2e

S.15 Key energy sources and methodologies

To determine the proportion of renewable energy usage, the locations of the nodes are to be determined using public information sites, open-source crawlers and crawlers developed in-house. If no information is available on the geographic distribution of the nodes, reference networks are used which are comparable in terms of their incentivization structure and consensus mechanism. This geo-information is merged with public information from the European Environment Agency (EEA) and thus determined. The intensity is calculated as the marginal energy cost wrt. one more transaction.

S.16 Key GHG sources and methodologies

To determine the GHG Emissions, the locations of the nodes are to be determined using public information sites, open-source crawlers and crawlers developed in-house. If no information is available on the geographic distribution of the nodes, reference networks



are used which are comparable in terms of their incentivization structure and consensus mechanism. This geo-information is merged with public information from the European Environment Agency (EEA) and thus determined. The intensity is calculated as the marginal emission wrt. one more transaction.

