

White paper drafted under the European Markets in Crypto-Assets Regulation (EU) 2023/1114 for FFG J8HB3QFM5



Preamble

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01. Date of notification

2025-10-22

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 omission likely to affect its import.

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

The crypto-asset referred to in this 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

Since the token has multiple functions (hybrid token), these are already conceptually not utility tokens within the meaning of the MiCAR within the definition of Article 3, 1. (9), due to the necessity "exclusively" being intended to provide access to a good or a service supplied by its issuer only.



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

The CFG tokens referred to in this white paper are crypto-assets other than EMTs and ARTs, and are issued on the Ethereum blockchain (2025-10-20 and according to DTI FFG shown in F.14) with a total number of 680,000,000 CFG. The first activity on Ethereum can be viewed on 2025-03-31 (see https://etherscan.io/tx/0x10de68e45c570c40ecb015e3d967d3a9fd3496d5b6c65e64fc1 09a94c3fdb141).

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

on the transferability

Not applicable.

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

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 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
Tim Zölitz	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

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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 expeted 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.

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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

Based on publicly available information, it appears that while certain foundations or affiliated entities exist in relation to the Centrifuge ecosystem, the crypto-asset itself is not currently administered by a central legal entity. Instead, governance and protocol-related decisions are managed by a decentralized autonomous organization (DAO). This DAO structure operates through community-based participation and decision-making processes, meaning that no single legal person or centralized organization holds formal control over the crypto-asset or its protocol governance. Consequently, there is no legal entity in the traditional corporate sense that can be regarded as the issuer or administrator of the crypto-asset.

B.3 Legal form

Not applicable.

B.4. Registered address

Not applicable.

B.5 Head office

Not applicable.

B.6 Registration date

Not applicable.

B.7 Legal entity identifier

Not applicable.

B.8 Another identifier required pursuant to applicable national law

Not applicable.

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B.9 Parent company

Not applicable.

B.10 Members of the management body

Not applicable.

B.11 Business activity

Not applicable.

B.12 Parent company business activity

Not applicable.

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: "Centrifuge", Short Name: "CFG" according to the Digital Token Identifier Foundation (www.dtif.org, DTI see F.13, FFG DTI see F.14 as of 2025-10-20).

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D.2 Crypto-assets name

See F.13.

D.3 Abbreviation

See F.13.

D.4 Crypto-asset project description

Based on publicly available documentation, the Centrifuge project focuses on developing a decentralized protocol that enables the tokenization of real-world assets (RWAs) and their financing through blockchain-based infrastructure. The protocol allows users to create and manage asset pools represented by digital tokens, which can be used to facilitate liquidity and capital allocation without reliance on traditional intermediaries.

The Centrifuge network operates as an open-source system maintained by a decentralized community. Governance and protocol-level decisions are made through a decentralized autonomous organization (DAO), which coordinates upgrades, parameters, and ecosystem initiatives via community voting. While certain foundations may support ecosystem development, the crypto-asset and its protocol are not administered by a central legal entity.

Accordingly, the Centrifuge project represents a decentralized technical framework designed to enable the on-chain representation and financing of real-world assets under community-based governance.

D.5 Details of all natural or legal persons involved in the implementation of the cryptoasset project

Name	Position	Address
Lucas Vogelsang	Co-founder of Centrifuge	Could not be identified.
Philip Stehlik	Co-founder of Centrifuge	Could not be identified.



k/factory (k-f dev AG)	Core Development & Infrastructure Partner	CH-ZG, Grafenauweg 8, 6300 Zug, Switzerland
Centrifuge Network Foundation, Inc.	Ecosystem Governance & Token Treasury Management	KY, Floor 4, Willow House, Cricket Square, Grand Cayman KY1-9010, Cayman Islands
Centrifuge Foundation	Network Development & Community Support	CH-ZG, c/o Helveticorp GmbH, Zweigniederlassung Zug, Chamerstrasse 176, 6300 Zug, Switzerland
Embrio Tech	Technical Support & Cloud Infrastructure	CH-ZH, Lindenbachstrasse 11, 8006 Zürich, Switzerland
Anemoy	On-chain Asset Management & RWA Investment Partner	IE-D, Unit 4 First Floor, 84 Strand Street, Skerries, Co. Dublin K34VW93, Ireland
Sources	https://centrifuge.io/contributors	Not applicable

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

There is no formally published fixed roadmap for the CFG token. Instead, strategic

directions are determined through the Centrifuge DAO and its governance process.

Forward-looking plans may relate to reward mechanics or protocol development. There

can be no assurance that such plans will enhance or support the token's value or

perception, nor that they will not have adverse consequences for holders.

Past milestones:

- Centrifuge V1 (2017–2020): Launch of the protocol and Tinlake on Ethereum,

introducing tokenized real-world asset pools and decentralized financing.

- Centrifuge V2 (2021–2023): Deployment of Centrifuge Chain on Substrate, with CFG as

the native token and on-chain governance. Integrations with MakerDAO and Aave

established Centrifuge as a leading RWA platform.

- Centrifuge V3 Migration (2025): Transition to an EVM-based architecture through

governance proposals CP141 and CP149. On 2025-05-20, a new ERC-20 CFG token

launched on Ethereum, replacing the legacy CFG and WCFG tokens at a 1:1 ratio. The

total supply was set at 680 million CFG, including 115 million newly minted for strategic

initiatives. The migration window remains open until 2025-11-30, after which the

Centrifuge Chain will be deprecated.

D.9 Resource allocation

The total supply of the CFG token amounts to 680,000,000 CFG. Following governance

proposal CP149, an additional 115,000,000 CFG (approximately 16.9 % of total supply)

were newly minted and allocated to the Centrifuge Network Foundation to support the

migration and long-term development of the protocol. Of this allocation, 100 million CFG

are subject to linear vesting over four years beginning May 20 2025, while 15 million

CFG were unlocked immediately to cover near-term operational and liquidity needs.

The temporary token distribution can be traced on-chain via:

https://etherscan.io/token/0xccccccc33d538dbc2ee4feab0a7a1ff4e8a94#balances



Investors must be aware that a public blockchain address cannot necessarily be attributed to a single natural or legal person, which limits the ability to determine precise economic control or potential future market actions. Such limitations, as well as future token unlocks or vesting changes, may affect the circulating supply and could have an impact on the token's market value.

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

Not applicable, as this white paper was drawn up for the admission to trading and not for collecting funds for the crypto-asset-project.

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.

E.3 Fundraising target

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

E.4 Minimum subscription goals

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



E.5 Maximum subscription goals

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

E.6 Oversubscription acceptance

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

E.7 Oversubscription allocation

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

E.8 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.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

The total supply of the crypto-asset is set at 680,000,000 units. Investors should note that changes in the token supply can have a negative impact. The effective amount of tokens available on the market depends on the number of tokens released by the issuer

or other parties at any given time, as well as potential reductions through token

"burning." As a result, the circulating supply may differ from the total supply.

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, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.16 Refund mechanism

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.17 Refund timeline

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.18 Offer phases

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.19 Early purchase discount

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.

E.20 Time-limited offer

Not applicable, as this white paper is written to support admission to trading and not for

the initial offer to the public.



E.21 Subscription period beginning

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

E.22 Subscription period end

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

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

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

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

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 market-

driven, 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

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holders, ensuring that it remains outside the scope of regulatory frameworks applicable

to traditional financial instruments.

F.2 Crypto-asset functionality

According to the official documentation (https://docs.centrifuge.io/, accessed 2025-10-

20), the CFG token represents the native governance crypto-asset of the Centrifuge

protocol. It functions as the central unit of value and coordination within the network

and serves multiple operational purposes.

CFG is used for protocol governance, staking, and payment of network fees. Holders

participate in decentralized governance by proposing and voting on protocol upgrades,

funding initiatives, and treasury management. Voting power is proportional to the

amount of CFG held or staked, ensuring community-driven decision-making across the

Centrifuge DAO. CFG also secures the protocol through staking mechanisms that align

validator and community incentives and mitigate malicious behaviour.

The total supply amounts to 680 million CFG, including 115 million newly minted tokens

allocated to the Centrifuge Network Foundation for strategic and ecosystem-support

purposes. The tokenomics further provide for a 3 % annual inflation rate accruing to the

Centrifuge DAO Treasury on Ethereum, intended to sustain long-term protocol

development and liquidity incentives.

CFG does not confer ownership, redemption, or profit-sharing rights in any legal entity.

Its value and utility derive solely from its use within the Centrifuge protocol and DAO

governance framework.

All functionalities depend on the continued technical operation and governance of the

Centrifuge protocol and may evolve with protocol upgrades or governance decisions.

F.3 Planned application of functionalities

See D.8.

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 Ethereum blockchain. The tokens are fungible (up to 18 digits after the decimal point) with a total supply of 680,000,000 units. 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

No formal issuer can be identified for the Token. Further information regarding the protocol, the broader ecosystem, and the Token is available at: https://centrifuge.io/.

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

2025-11-20

F.10 Publication date

2025-11-20

F.11 Any other services provided by the issuer

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).

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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

SRRHG1G86

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

I8HB3QFM5

F.15 Voluntary data flag

Mandatory.

F.16 Personal data flag

The white paper does contain personal data.

F.17 LEI eligibility

Eligibility as defined for identifiable legal entities does not apply in the case of a DAO

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

The crypto-asset does not grant any legally enforceable or contractual rights or obligations to its holders or purchasers.

Any functionalities accessible through the underlying technology are of a purely

technical or operational nature and do not constitute rights comparable to ownership,

profit participation, governance, or similar entitlements known from traditional financial

instruments.

Accordingly, holders do not acquire any claim capable of legal enforcement against the

issuer or any third party.

G.2 Exercise of rights and obligations

As the crypto-asset does not establish any legally enforceable rights or obligations, there

are no applicable procedures or conditions for their exercise.

Any interaction or functionality that may be available within the technical infrastructure

of the project - such as participation mechanisms or protocol-level features - serves an

operational purpose only and does not create or evidence a contractual or statutory

entitlement.

G.3 Conditions for modifications of rights and obligations

Because the crypto-asset does not confer legally enforceable rights or obligations, there

are no conditions or mechanisms under which such rights could be modified.

Adjustments to the technical protocol, smart contract logic, or related systems may

occur in the ordinary course of development or maintenance.

Such changes do not alter any legal position of holders, as no contractual or regulatory

rights exist. Holders should not interpret technical updates or governance-related

changes as amendments to legally binding entitlements.

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 (2025-10-20).

G.5 Issuer retained crypto-assets

As the issuer could not be determined, no information about retained assets by the

issuer itself were available at the time of drafting this white paper (2025-10-22).

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G.6 Utility token classification

No

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

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

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 2025-10-17. Also, it is possible to decrease the circulating supply, by transferring crypto-assets to so called "burn-addresses", which are addresses that render the crypto-asset "non-transferable" after sent to those addresses.

G.13 Supply adjustment mechanisms

For the crypto-asset in scope, the supply is limited to 680,000,000 tokens. Investors should note that changes in the token supply can have a negative impact.



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 crypto-asset operates on a well-defined set of protocols and technical standards that are intended to ensure its security, decentralization, and functionality. It is running on the Ethereum blockchain. Below are some of the key ones:

1. Network Protocols

The crypto-asset follows a decentralized, peer-to-peer (P2P) protocol where nodes communicate over the crypto-asset's DevP2P protocol using RLPx for data encoding.

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- Transactions and smart contract execution are secured through Proof-of-Stake (PoS)

consensus.

- Validators propose and attest blocks in Ethereum's Beacon Chain, finalized through

Casper FFG.

- The Ethereum Virtual Machine (EVM) executes smart contracts using Turing-complete

bytecode.

2. Transaction and Address Standards

crypto-asset Address Format: 20-byte addresses derived from Keccak-256 hashing of

public keys.

Transaction Types:

- Legacy Transactions (pre-EIP-1559)

- Type 0 (Pre-EIP-1559 transactions)

- Type 1 (EIP-2930: Access list transactions)

- Type 2 (EIP-1559: Dynamic fee transactions with base fee burning)

The Pectra upgrade introduces EIP-7702, a transformative improvement to account

abstraction. This allows externally owned accounts (EOAs) to temporarily act as smart

contract wallets during a transaction. It provides significant flexibility, enabling

functionality such as sponsored gas payments and batched operations without

changing the underlying account model permanently.

3. Blockchain Data Structure & Block Standards

- the crypto-asset's blockchain consists of accounts, smart contracts, and storage states,

maintained through Merkle Patricia Trees for efficient verification.

Each block contains:

- Block Header: Parent hash, state root, transactions root, receipts root, timestamp, gas

limit, gas used, proposer signature.

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- Transactions: Smart contract executions and token transfers.

- Block Size: No fixed limit; constrained by the gas limit per block (variable over time). In

line with Ethereum's scalability roadmap, Pectra includes EIP-7691, which increases the

maximum number of "blobs" (data chunks introduced with EIP-4844) per block. This

change significantly boosts the data availability layer used by rollups, supporting

cheaper and more efficient Layer 2 scalability.

4. Upgrade & Improvement Standards

Ethereum follows the Ethereum Improvement Proposal (EIP) process for upgrades.

H.3 Technology used

1. Decentralized Ledger: The Ethereum 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.

2. Private Key Management: To safeguard their token holdings, users must securely

store their wallet's private keys and recovery phrases.

3. Cryptographic Integrity: Ethereum employs elliptic curve cryptography to validate and

execute transactions securely, intended to ensure the integrity of all transfers. The

Keccak-256 (SHA-3 variant) Hashing Algorithm is used for hashing and address

generation. The crypto-asset uses ECDSA with secp256k1 curve for key generation and

digital signatures. Next to that, BLS (Boneh-Lynn-Shacham) signatures are used for

validator aggregation in PoS.

H.4 Consensus mechanism

The crypto-asset's Proof-of-Stake (PoS) consensus mechanism, introduced with The

Merge in 2022, replaces mining with validator staking. Validators must stake at least 32

ETH every block a validator is randomly chosen to propose the next block. Once

proposed the other validators verify the blocks integrity. The network operates on a slot

and epoch system, where a new block is proposed every 12 seconds, and finalization

occurs after two epochs (~12.8 minutes) using Casper-FFG. The Beacon Chain

coordinates validators, while the fork-choice rule (LMD-GHOST) ensures the chain

follows the heaviest accumulated validator votes. Validators earn rewards for proposing

and verifying blocks, but face slashing for malicious behavior or inactivity. PoS aims to

improve energy efficiency, security, and scalability, with future upgrades like Proto-

Danksharding enhancing transaction efficiency.

H.5 Incentive mechanisms and applicable fees

The crypto-asset's PoS system secures transactions through validator incentives and

economic penalties. Validators stake at least 32 ETH and earn rewards for proposing

blocks, attesting to valid ones, and participating in sync committees. Rewards are paid in

newly issued ETH and transaction fees. Under EIP-1559, transaction fees consist of a

base fee, which is burned to reduce supply, and an optional priority fee (tip) paid to

validators. Validators face slashing if they act maliciously and incur penalties for

inactivity. This system aims to increase security by aligning incentives while making the

crypto-asset's fee structure more predictable and deflationary during high network

activity.

H.6 Use of distributed ledger technology

No, DLT not operated by the issuer, offeror, a person seeking admission to trading or a

third-party acting on the issuer's their 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 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. 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

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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.

7. Information asymmetry

Different groups of participants may not have the same access to technical details or

governance information, leading to uneven decision-making and potential

disadvantages for less informed investors.

I.2 Issuer-related risks

1. Insolvency

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As with every other commercial endeavor, the risk of insolvency of entities involved in

the project 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, entities involved in the project have most likely engaged in different

business relationships with one or more third parties on which they and the network

strongly depend on. Loss or changes in the leadership or key partners of entities

involved in the project 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 entities involved in the

project to be subject to private litigation. The aforeementioned 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 business,

causing disruptions, financial losses, or reputational damage of entities involved in the

project.

5. Industry

The network and all entities involved in the project are and will be subject to all of the

risks and uncertainties associated with a crypto-project, where the token issued has

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zero intrinsic value. History has shown that most of this projects resulted in financial

losses for the investors and were only set-up to enrich a few insiders with the money

from retail investors.

6. Reputational

The network and all entities involved in the project face the risk of negative publicity,

whether due to, without limitation, operational failures, security breaches, or association

with illicit activities, which can damage the reputation of the network and all entities

involved in the project 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

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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 anti-money 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 cryptoasset illegal or impossible to use, buy, or sell in certain jurisdictions. On top of that, regulators could take action against the network and all entities involved in the project 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 crypotasset and/or could cause a complete loss of funds of the invested money in the cryptoasset for the investor.

10. Counterparty risk

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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 the network'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.

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.

19. Legal ownership: Depending on jurisdiction, token holders may not have

enforceable legal rights over their holdings, limiting avenues for recourse in disputes or

cases of fraud.

20. Jurisdictional blocking: Access to exchanges, wallets, or interfaces may be restricted

based on user location or regulatory measures, even if the token remains transferable

on-chain.

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21. Token concentration: A large proportion of tokens held by a few actors could allow

price manipulation, governance dominance, or sudden sell-offs impacting market

stability.

22. Ecosystem incentive misalignment: If validator, developer, or user rewards become

unattractive or distorted, network security and participation could decline.

23. Governance deadlock: Poorly structured or fragmented governance processes may

prevent timely decisions, creating delays or strategic paralysis.

24. Compliance misalignment: Features or delivery mechanisms may unintentionally

conflict with evolving regulations, particularly regarding consumer protection or data

privacy.

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 involve the DLT networks where the crypto asset is

issued in.

1. Blockchain Dependency Risks

Network Downtime: Potential outages or congestion on the involved blockchains could

interrupt on-chain token transfers, trading, and other functions.

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 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 blockchains 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, the relatively smaller number of validators/concentration of stakes within the networks compared to other blockchains might pose centralization risks, potentially affecting network resilience.

- 5. Evolving Technology Risks: Technological Obsolescence: The fast pace of innovation in blockchain technology may make the used token standard appear less competitive or become outdated, potentially impacting the usability or adoption of the token.
- 6. Bridges: The dependency on multiple ecosystems can negatively impact investors. This asset bridge creates corresponding risks for investors, as this lock-in mechanism may not function properly for technical reasons or may be subject to attack. In that case, the supply may change immediately or the ownership rights to tokens may be changed.
- 7. Forking risk: Network upgrades may split the blockchain into separate versions, potentially creating duplicate tokens or incompatibility between different versions of the protocol.
- 8. Economic abstraction: Mechanisms such as gas relayers or wrapped tokens may allow users to bypass the native asset, reducing its direct demand and weakening its economic role.
- 9. Dust and spam attacks: Low-value transactions may flood the network, increasing ledger size, reducing efficiency, and exposing user addresses to tracking.

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10. Frontend dependency: If users rely on centralised web interfaces or wallets, service

outages or compromises could block access even if the blockchain itself continues to

operate.

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

Centrifuge

S.4 Consensus Mechanism

The following applies to the Ethereum network:

The crypto-asset's Proof-of-Stake (PoS) consensus mechanism, introduced with The

Merge in 2022, replaces mining with validator staking. Validators must stake at least 32

ETH every block a validator is randomly chosen to propose the next block. Once

proposed the other validators verify the blocks integrity. The network operates on a slot

and epoch system, where a new block is proposed every 12 seconds, and finalization

occurs after two epochs (~12.8 minutes) using Casper-FFG. The Beacon Chain

coordinates validators, while the fork-choice rule (LMD-GHOST) ensures the chain

follows the heaviest accumulated validator votes. Validators earn rewards for proposing

and verifying blocks, but face slashing for malicious behavior or inactivity. PoS aims to

improve energy efficiency, security, and scalability, with future upgrades like Proto-

Danksharding enhancing transaction efficiency.

S.5 Incentive Mechanisms and Applicable Fees

The following applies to the Ethereum network:

The crypto-asset's PoS system secures transactions through validator incentives and

economic penalties. Validators stake at least 32 ETH and earn rewards for proposing

blocks, attesting to valid ones, and participating in sync committees. Rewards are paid in

newly issued ETH and transaction fees. Under EIP-1559, transaction fees consist of a

base fee, which is burned to reduce supply, and an optional priority fee (tip) paid to

validators. Validators face slashing if they act maliciously and incur penalties for

inactivity. This system aims to increase security by aligning incentives while making the

crypto-asset's fee structure more predictable and deflationary during high network

activity.

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

2024-10-20

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

2025-10-20

S.8 Energy consumption

268.65105 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

Ethereum is calculated first. For the energy consumption of the token, a fraction of the

energy consumption of the network is attributed to the token, which is determined

based on the activity of the crypto-asset within the network. When calculating the

energy consumption, the Functionally Fungible Group Digital Token Identifier (FFG DTI) is

used - if available - to determine all implementations of the asset in scope. The

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mappings are updated regularly, based on data of the Digital Token Identifier Foundation. The information regarding the hardware used and the number of participants in the network is based on assumptions that are verified with best effort using empirical data. In general, participants are assumed to be largely economically rational. As a precautionary principle, we make assumptions on the conservative side when in doubt, i.e. making higher estimates for the adverse impacts.

S.10 Renewable energy consumption

32.2255486008 %

S.11 Energy intensity

0.00007 kWh

S.12 Scope 1 DLT GHG emissions - Controlled

0.00000 tCO2e/a

S.13 Scope 2 DLT GHG emissions – Purchased

0.08941 tCO2e/a

S.14 GHG intensity

0.00002 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 Our World in Data, see citation. The intensity is calculated as the marginal energy cost wrt. one more transaction. Ember (2025); Energy Institute - Statistical Review of World Energy (2024) - with major processing by Our World in Data. "Share of electricity generated by renewables - Ember and Energy Institute" [dataset]. Ember, "Yearly Electricity Data Europe"; Ember, "Yearly Electricity Data"; Energy Institute,

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"Statistical Review of World Energy" [original data]. Retrieved from https://ourworldindata.org/grapher/share-electricity-renewables.

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 Our World in Data, see citation. The intensity is calculated as the marginal emission wrt. one more transaction. Ember (2025); Energy Institute - Statistical Review of World Energy (2024) - with major processing by Our World in Data. "Carbon intensity of electricity generation - Ember and Energy Institute" [dataset]. Ember, "Yearly Electricity Data Europe"; Ember, "Yearly Electricity Data"; Energy Institute, "Statistical Review of World Energy" [original datal. Retrieved from https://ourworldindata.org/grapher/carbon-intensity-electricity Licenced under CC BY 4.0.

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