

# **White paper drafted under the European Markets in Crypto- Assets Regulation (EU) 2023/1114 for FFG CH7NXRXR1**

# Preamble

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## 01. Date of notification

This white paper was notified at 2025-12-04.

## 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

As defined in Article 3(9) of Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on Markets in Crypto-Assets – amending Regulations (EU) No 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937 – a utility token is “a type of crypto-asset that is only intended to provide access to a good

or a service supplied by its issuer". This crypto-asset does not qualify as a utility token, as its intended use goes beyond providing access to a good or service supplied solely by the issuer.

## **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 crypto-asset Morpho Token (MORPHO) referred to in this white paper is a crypto-asset other than EMTs and ARTs, and is issued on the Ethereum and Base blockchain as of 2025-10-30 and according to DTI FFG shown in F.14.

The maximum supply of the crypto-asset is fixed at 1,000,000,000 units. The first on-chain activity of the crypto-asset on Ethereum took place on 2024-11-10 (transaction hash: 0x1a8de6a5ba99b4dcd91ff35424e2e3adf76b1de440f97e4a48b22bfe9a8f96e9, source:

<https://etherscan.io/tx/0x1a8de6a5ba99b4dcd91ff35424e2e3adf76b1de440f97e4a48b22bfe9a8f96e9>, accessed on 2025-12-04).

The first on-chain activity of the crypto-asset on Base network took place on 2024-11-11 (transaction hash:

x0x11187c2ba28e5f78a655f4642fc7d35c9ad0b3b624e8fc349917c526a090f7a,

source:

<https://basescan.org/tx/0x11187c2ba28e5f78a655f4642fc7d35c9ad0b3b624e8fc349917c526a090f7a>, accessed on 2025-12-04).

The crypto-asset serves as the protocol's governance token and also functions as a reward unit within the network.

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 rights enforceable in law, or similar entitlements known from traditional financial instruments.

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

As defined in Article 3(9) of Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on Markets in Crypto-Assets – amending Regulations (EU)

No 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937 – a utility token is “a type of crypto-asset that is only intended to provide access to a good or a service supplied by its issuer”. This crypto-asset does not qualify as a utility token, as its intended use goes beyond providing access to a good or service supplied solely by the issuer.

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

Crypto Risk Metrics GmbH is seeking admission to trading on Payward Global Solutions LTD ("Kraken") platform in the European Union in accordance with 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. The admission to trading is not accompanied by a public offer of the crypto-asset.

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

#### A.1 Name

Crypto Risk Metrics GmbH is the person seeking admission to trading.

#### A.2 Legal form

The legal form of Crypto Risk Metrics GmbH is 2HBR, which corresponds to "Gesellschaft mit beschränkter Haftung".

#### A.3 Registered address

The registered address of Crypto Risk Metrics GmbH is DE-HH, Lange Reihe 73, 20099 Hamburg, Germany.

#### A.4 Head office

Crypto Risk Metrics GmbH has no head office.

**A.5 Registration date**

Crypto Risk Metrics GmbH was registered on 2018-12-03.

**A.6 Legal entity identifier**

The Legal Entity Identifier (LEI) of Crypto Risk Metrics GmbH is 39120077M9TG0O1FE242.

**A.7 Another identifier required pursuant to applicable national law**

The national identifier of Crypto Risk Metrics GmbH is HRB 154488.

**A.8 Contact telephone number**

+4915144974120

**A.9 E-mail address**

info@crypto-risk-metrics.com

**A.10 Response time (Days)**

Crypto Risk Metrics GmbH will respond to investor enquiries within 30 calendar days.

**A.11 Parent company**

Crypto Risk Metrics GmbH has no parent company.

**A.12 Members of the management body**

Identity	Function	Business Address
Tim Zöllitz	Chairman	Lange Reihe 73, 20099 Hamburg, Germany

**A.13 Business activity**

Crypto Risk Metrics GmbH is a technical service provider, which supports regulated entities in the fulfilment of their regulatory requirements. In this regard, Crypto Risk Metrics GmbH, among other services, acts as a data-provider for ESG data according to article 66 (5). Due to the regulations laid out in article 4 (7), 5 (4) and 66 (3) 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 to provide central services for crypto-asset white papers.

#### **A.14 Parent company business activity**

Crypto Risk Metrics GmbH does not have a parent company. Accordingly, no business activity of a parent company is to be reported in this section.

#### **A.15 Newly established**

Crypto Risk Metrics GmbH has been established since 2018-12-03 and is therefore not newly established (i. e. more than three years).

#### **A.16 Financial condition for the past three years**

Crypto Risk Metrics GmbH, founded in 2018 and based in Hamburg (HRB 154488), has undergone several strategic shifts in its business focus since incorporation. Due to these changes in business model and operational direction over time, the financial figures from earlier years are only comparable to a limited extent with the company's current commercial activities. The present business model – centred around regulatory technology and risk analytics in the context of the MiCAR framework – has been established progressively and can be realistically considered fully operational since approximately 2024.

The company's financial trajectory over the past three years reflects the transition from exploratory development toward market-ready product delivery. The profit and loss after tax for the last three financial years is as follows:

2024 (unaudited): negative EUR 50.891,81

2023 (unaudited): negative EUR 27.665,32

2022: EUR 104.283,00.

The profit in 2022 resulted primarily from legacy consulting activities, which were discontinued in the course of the company's repositioning.

The losses in 2023 and 2024 result from strategic investments in the development of proprietary software infrastructure, regulatory frameworks, and compliance technology for the MiCAR ecosystem. During those periods, no substantial commercial revenues were expected, as resources were directed toward preparing the platform for regulated market entry.

A fundamental repositioning of the company occurred in 2023 and especially in 2024, when the focus shifted toward providing risk management, regulatory reporting, and supervisory compliance solutions for financial institutions and crypto-asset service providers. This marked a material shift in business operations and monetisation strategy.

Based on the current business development in Q4 2025, revenues exceeding EUR 550,000 are expected for the fiscal year 2025, with an anticipated net profit of approximately EUR 100,000. These figures are neither audited nor based on a finalized annual financial statement; they are derived from the company's current pipeline, client development, and active commercial engagements. Accordingly, they are subject to future risks and market fluctuations.

With the regulatory environment now taking shape and the platform commercially validated, it is assumed that the effects of the strategic developments will continue to materialize in 2026. The company foresees further scalability of its technology and growing market demand for regulatory compliance tools in the European crypto-asset sector.

No public subsidies or governmental grants have been received to date; all operations have been financed through shareholder contributions and internally generated resources. Crypto Risk Metrics has never accepted any payments via Tokens from projects it has worked for and – due to the internal Conflicts of Interest Policy – never will.

#### **A.17 Financial condition since registration**

Not applicable. The company has been established for more than three years and its financial condition over the past three years is provided in Part A.16 above.

## 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, the issuer is different from the person seeking admission to trading.

#### B.2 Name

Due to the nature of a Decentralised Autonomous Organisation (DAO), the name of the issuer cannot be determined.

Based on publicly available information (<https://docs.morpho.org/learn/governance/organization#morpho-association>, accessed 2025-10-30), governance and protocol-related decisions in the Morpho ecosystem are managed by a decentralized autonomous organization (DAO). No single legal person or centralized entity holds formal control over the crypto-asset or its governance.

The Morpho Association, a nonprofit entity under French law, groups core contributors and users to support the protocol's development. It hosts the front end at [morpho.org](https://morpho.org), maintains technical documentation, and holds the intellectual property of open-source repositories under GPL-3 license. The Association itself does not develop Morpho software.

#### 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.

**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 since Crypto Risk Metrics GmbH is not a trading platform.

**C.2 Legal form**

Not applicable since Crypto Risk Metrics GmbH is not a trading platform.

**C.3 Registered address**

Not applicable since Crypto Risk Metrics GmbH is not a trading platform.

**C.4 Head office**

Not applicable since Crypto Risk Metrics GmbH is not a trading platform.

**C.5 Registration date**

Not applicable since Crypto Risk Metrics GmbH is not a trading platform.

**C.6 Legal entity identifier**

Not applicable since Crypto Risk Metrics GmbH is not a trading platform.

**C.7 Another identifier required pursuant to applicable national law**

Not applicable since Crypto Risk Metrics GmbH is not a trading platform.

**C.8 Parent company**

Not applicable since Crypto Risk Metrics GmbH is not a trading platform.

**C.9 Reason for crypto-Asset white paper Preparation**

Not applicable since Crypto Risk Metrics GmbH is not a trading platform.

**C.10 Members of the Management body**

Not applicable since Crypto Risk Metrics GmbH is not a trading platform.

**C.11 Operator business activity**

Not applicable since Crypto Risk Metrics GmbH is not a trading platform.

**C.12 Parent company business activity**

Not applicable since Crypto Risk Metrics GmbH is not a trading platform.

**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 since Crypto Risk Metrics GmbH is not a trading platform.

**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 since Crypto Risk Metrics GmbH is not a trading platform.

## Part D – Information about the crypto-asset project

### D.1 Crypto-asset project name

Long Name: "Morpho Token", Short Name: "MORPHO" according to the Digital Token Identifier Foundation ([www.dtif.org](http://www.dtif.org), DTI see F.13, FFG DTI see F.14 as of 2025-10-30).

### D.2 Crypto-assets name

Long Name: "Morpho Token" according to the Digital Token Identifier Foundation ([www.dtif.org](http://www.dtif.org), DTI see F.13, FFG DTI see F.14 as of 2025-10-30).

### D.3 Abbreviation

Short Name: "MORPHO" according to the Digital Token Identifier Foundation ([www.dtif.org](http://www.dtif.org), DTI see F.13, FFG DTI see F.14 as of 2025-10-30).

### D.4 Crypto-asset project description

According to public information (source: <https://docs.morpho.org/>, accessed 2025-10-30), Morpho is a decentralized, non-custodial lending protocol, which enables over-collateralized borrowing and lending. Markets are defined by a single collateral asset, a single loan asset, an oracle, an immutable interest-rate model, and a predefined liquidation threshold.

The native crypto-asset is MORPHO. It serves as the protocol's governance token and also functions as a reward unit within the network. The maximum supply is 1,000,000,000 MORPHO.

The token does not represent equity, profit participation or redemption rights, and its primary observable use is limited to possible governance-related functions and transferability on compatible blockchain infrastructure.

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

Name	Position	Address

Merlin Egalité	Co-founder of Morpho	Could not be identified.
Paul Frambot	Co-founder of Morpho	Could not be identified.
Morpho Association (formerly "ADDMO")	French nonprofit association acting as coordinating and governance-support entity of the Morpho ecosystem	FR, 24 rue de Clichy, 75009 Paris, France
Morpho Labs SAS	French joint-stock company serving as development entity and employer within the EU; wholly owned subsidiary of the Morpho Association	FR, 229 Rue Saint-Honoré, 75001 Paris, France
Morpho Labs Inc.	Delaware C-Corporation used for employment and operations in the United States; wholly owned subsidiary of the Morpho Association	Could not be identified.
Info	Source: <a href="https://morpho.org/blog/aligning-around-morpho-the-only-asset-for-morpho/">https://morpho.org/blog/aligning-around-morpho-the-only-asset-for-morpho/</a> (accessed 2025-10-30)	Not applicable.

#### **D.6 Utility Token Classification**

As defined in Article 3(9) of Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on Markets in Crypto-Assets – amending Regulations (EU) No 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937 – a utility token is “a type of crypto-asset that is only intended to provide access to a good

or a service supplied by its issuer". This crypto-asset does not qualify as a utility token, as its intended use goes beyond providing access to a good or service supplied solely by the issuer.

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

As defined in Article 3(9) of Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on Markets in Crypto-Assets – amending Regulations (EU) No 1093/2010 and (EU) No 1095/2010 and Directives 2013/36/EU and (EU) 2019/1937 – a utility token is "a type of crypto-asset that is only intended to provide access to a good or a service supplied by its issuer". This crypto-asset does not qualify as a utility token, as its intended use goes beyond providing access to a good or service supplied solely by the issuer.

#### **D.8 Plans for the token**

This section provides an overview of the historical developments related to the Morpho token and a description of planned or anticipated project milestones as publicly communicated. All forward-looking elements are subject to significant uncertainty. They do not constitute commitments, assurances, or guarantees, and may be modified, delayed, or discontinued at any time. The implementation of past milestones cannot be assumed, and future changes may have adverse effects for token holders.

Past milestones:

- DAO vote to enable MORPHO transferability (2024-11-21): Community approved turning on transferability for MORPHO; legacy token could be wrapped to enable on-chain vote tracking (MIP-75).
- Launch of Morpho Vaults V2 (2025-09-29): Announced as a new standard for on-chain asset curation with expanded risk management and role-based governance.

Future milestones:

As of the time of writing this whitepaper, no forward-looking token milestones are formally scheduled; any future changes will be determined by DAO governance processes.

## D.9 Resource allocation

According to the information published in the Morpho documentation (<https://docs.morpho.org>, accessed 2025-10-30), the total supply of the MORPHO token amounts to 1,000,000,000 MORPHO. The publicly available allocation framework divides this supply across several functional categories designed to support governance, contributors, partners, users, and ecosystem growth, as follows:

- 35.4 % (354,000,000 MORPHO) to Morpho governance (DAO treasury and governance-controlled reserves);
- 4.9 % (49,000,000 MORPHO) to Users & Launch Pools (distributed and ongoing rewards);
- 6.3 % (63,000,000 MORPHO) to the Morpho Association (ecosystem development);
- 5.8 % (58,000,000 MORPHO) Reserve for Contributors (future contributors, service providers, researchers);
- 27.5 % (275,000,000 MORPHO) to Strategic Partners;
- 15.2 % (152,000,000 MORPHO) to Founders;
- 4.9 % (49,000,000 MORPHO) to Early Contributors.

Additional disclosed context:

- Circulating supply at the transferability date was expected to be ~11.2 %; subsequent evolution depends on governance-controlled distributions and vesting unlocks.
- Transferability of MORPHO was enabled by governance on 21 November 2024; the legacy token can be wrapped 1:1 into the upgradeable, vote-enabled wrapped MORPHO per MIP-75.

The temporary token distribution can be traced on-chain, on Ethereum:  
<https://etherscan.io/token/0x58d97b57bb95320f9a05dc918aef65434969c2b2#balances>

The temporary token distribution can be traced on-chain, on Base:  
<https://basescan.org/token/0xBAa5CC21fd487B8Fcc2F632f3F4E8D37262a0842#balances>

The investor must be aware that a public address cannot necessarily be assigned to a single person or entity, which limits the ability to determine exact economic influence or future actions. Token distribution changes can negatively impact the investor.

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

Not applicable, as this white paper serves the purpose of admission to trading and is not associated with any fundraising activity 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).

#### **E.2 Reasons for public offer or admission to trading**

The purpose of seeking admission to trading is to enable the crypto-asset to be listed on a regulated platform in accordance with the applicable provisions of Regulation (EU) 2023/1114 and Commission Implementing Regulation (EU) 2024/2984. The white paper has been drawn up to comply with the transparency requirements applicable to trading venues. No funds or crypto-assets are collected in connection with this admission.

#### **E.3 Fundraising target**

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

**E.4 Minimum subscription goals**

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

**E.5 Maximum subscription goals**

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

**E.6 Oversubscription acceptance**

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

**E.7 Oversubscription allocation**

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

**E.8 Issue price**

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

**E.10 Subscription fee**

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

**E.11 Offer price determination method**

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

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

The total supply of the crypto-asset is, according to the the crypto-asset project (<https://docs.morpho.org/learn/governance/morpho-token/>, accessed 2025-10-30) set at 1,000,000,000 units. Investors should note that changes in the effective supply – including sudden increases in circulating units or unexpected burns – may affect the token's price and liquidity. The effective amount of units available on the market depends on the number of units released by the issuer or other parties at any given time, as well as potential reductions through "burning." As a result, the circulating supply may differ from the total supply.

**E.13 Targeted holders**

The admission of the crypto-asset to trading is open to all types of investors.

**E.14 Holder restrictions**

Holder restrictions are subject to the rules applicable to the crypto-asset service provider, as well as to any additional restrictions such provider may impose.

**E.15 Reimbursement notice**

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

**E.16 Refund mechanism**

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

**E.17 Refund timeline**

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

**E.18 Offer phases**

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

**E.19 Early purchase discount**

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

**E.20 Time-limited offer**

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

**E.21 Subscription period beginning**

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

**E.22 Subscription period end**

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

**E.24 Payment methods for crypto-asset purchase**

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

**E.25 Value transfer methods for reimbursement**

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

**E.26 Right of withdrawal**

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

**E.27 Transfer of purchased crypto-assets**

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

**E.28 Transfer time schedule**

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

**E.29 Purchaser's technical requirements**

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

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

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

**E.31 CASP identifier**

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

**E.32 Placement form**

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

**E.33 Trading platforms name**

The admission to trading is sought on Payward Global Solutions LTD ("Kraken").

**E.34 Trading platforms Market identifier code (MIC)**

The Market Identifier Code (MIC) of Payward Global Solutions LTD ("Kraken") is PGSL.

**E.35 Trading platforms access**

The token is expected to be listed on the trading platform operated by Payward Global Solutions LTD ("Kraken"). Access to this platform depends on regional availability and

user eligibility under Kraken's terms and conditions. Investors should consult Kraken's official documentation to determine whether they meet the requirements for account creation and token trading.

#### **E.36 Involved costs**

The costs involved in accessing the trading platform depend on the specific fee structure and terms of the respective crypto-asset service provider. These may include trading fees, deposit or withdrawal charges, and network-related gas fees. Investors are advised to consult the applicable fee schedule of the chosen platform before engaging in trading activities.

#### **E.37 Offer expenses**

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

#### **E.38 Conflicts of interest**

MiCAR-compliant crypto-asset service providers shall have strong measures in place in order to manage conflicts of interests. Due to the broad audience this white paper is addressing, potential investors should always check the conflicts-of-interest policy of their respective counterparty.

Crypto Risk Metrics GmbH maintains a comprehensive conflict-of-interest policy. On this basis, potential conflicts of interest on the side of Crypto Risk Metrics GmbH can be excluded for the purposes of this assessment.

#### **E.39 Applicable law**

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

#### **E.40 Competent court**

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

## 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 (MiCA) but is neither classified 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 governed by a stabilisation mechanism. It is neither pegged to any fiat currency nor backed by any external assets, thereby clearly distinguishing it from EMTs and ARTs.

Furthermore, the crypto-asset is not categorised 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

The crypto-asset associated with the Morpho protocol serves as a technical component within a decentralised lending and borrowing environment. Its primary functionality is linked to facilitating the governance mechanisms that determine parameters of the protocol's risk and operational framework. Holders of the asset may participate in governance processes that influence the configuration of lending markets, adjustment of protocol parameters, and oversight of updates relevant to the protocol's continued operation.

In addition, the asset is embedded in mechanisms intended to align interests among participants who contribute to the protocol's maintenance and monitoring. Depending

on the protocol's design at a given point in time, the crypto-asset may be integrated into processes such as staking or delegated decision-making, each of which is designed to support the protocol's technical sustainability and the integrity of governance outcomes. The asset does not provide any claim, entitlement, or guarantee regarding financial returns, access to services, or rights against the issuer or any third party.

Its functionality is limited to its role within the protocol's technical and governance framework and may be subject to change as the protocol evolves.

#### **F.3 Planned application of functionalities**

As of the time of writing this whitepaper, no forward-looking token milestones are formally scheduled; any future changes will be determined by DAO governance processes.

**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 type of submission is NEWT (New white paper).

#### **F.6 Crypto-asset characteristics**

The crypto-asset referred to herein is a crypto-asset other than EMTs and ARTs, and is available on the Ethereum and Base network. The crypto-asset is fungible up to 18 digits after the decimal point. The crypto-asset constitutes a digital representation recorded on distributed-ledger technology and does not confer ownership, governance, profit participation, or any other legally enforceable rights. Any functionalities associated with the crypto-asset are limited to potential technical features within the relevant platform environment. These functionalities do not represent contractual entitlements and may depend on future development decisions, technical design choices, and operational

conditions. The crypto-asset does not embody intrinsic economic value; instead, its value, if any, is determined exclusively by market dynamics such as supply, demand, and liquidity in secondary markets.

**F.7 Commercial name or trading name**

Long Name: "Morpho Token" according to the Digital Token Identifier Foundation (www.dtif.org, DTI see F.13, FFG DTI see F.14 as of 2025-10-30).

**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://morpho.org/>.

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

The intended admission to trading is 2026-01-07.

**F.10 Publication date**

The intended publication date is 2026-01-07.

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

No such services are currently known to be provided by the issuer. However, it cannot be excluded that additional services exist or may be offered in the future outside the scope of Regulation (EU) 2023/1114.

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

EN

**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**

S4J67GQ0C; 9THMVS7CS

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

CH7NXRXR1

**F.15 Voluntary data flag**

This white paper has been submitted as mandatory under Regulation (EU) 2023/1114.

**F.16 Personal data flag**

Yes, this white paper contains personal data as defined in Regulation (EU) 2016/679 (GDPR).

**F.17 LEI eligibility**

The issuer should be eligible for a Legal Entity Identifier (LEI).

**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 operational purposes only and does not create or constitute evidence of any contractual or statutory entitlement.

## **G.3 Conditions for modifications of rights and obligations**

As the crypto-asset does not confer any 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 the 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 (2025-10-30).

## **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 (2025-10-30).

## **G.6 Utility token classification**

No – the crypto-asset project does not concern utility tokens as defined in Article 3(9) of Regulation (EU) 2023/1114.

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

Not applicable, as the crypto-asset described herein is not a utility token.

## **G.8 Utility tokens redemption**

Not applicable, as the crypto-asset described herein is not a utility token.

## **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 seek admission to trading, not for the initial offer to the public.

## **G.11 Crypto-assets transfer restrictions**

The crypto-assets themselves are not subject to any technical or contractual transfer restrictions and are generally freely transferable. However, crypto-asset service providers may impose restrictions on buyers or sellers in accordance with applicable laws, internal policies or contractual terms agreed with their clients.

## **G.12 Supply adjustment protocols**

No – there are no fixed protocols that can increase or decrease the supply of the crypto-asset in response to changes in demand as of 2025-12-03.

However, it is possible to decrease the circulating supply by transferring crypto-assets to so-called "burn addresses". These are addresses from which the tokens are no longer intended to be transferred or accessed, effectively removing them from circulation.

## **G.13 Supply adjustment mechanisms**

For the crypto-asset in scope, the supply is limited to 1,000,000,000 tokens according to the crypto-asset project (<https://docs.morpho.org/learn/governance/morpho-token/>, accessed 2025-11-30). Investors should note that changes in the token supply can have a negative impact.

#### **G.14 Token value protection schemes**

No – the crypto-asset does not have any mechanisms or schemes in place that aim to stabilise or protect its market value. Its value is determined solely by market supply and demand, and may be subject to significant volatility.

#### **G.15 Token value protection schemes description**

Not applicable, as the crypto-asset in scope does not have any value protection scheme in place.

#### **G.16 Compensation schemes**

No – the crypto-asset does not have any compensation scheme.

#### **G.17 Compensation schemes description**

Not applicable, as the crypto-asset in scope does not have any compensation scheme in place.

#### **G.18 Applicable law**

This white paper is submitted in the context of an application for admission to trading on a trading platform established in the European Union. Therefore, the law of the Member State in which the trading platform is established may apply.

#### **G.19 Competent court**

Any disputes arising in relation to this white paper or the admission to trading may fall under the jurisdiction of the courts located in the Member State of the trading platform.

### **Part H – information on the underlying technology**

#### **H.1 Distributed ledger technology (DTL)**

The crypto-asset in scope is implemented on the Ethereum and Base network following the standards described below.

## H.2 Protocols and technical standards

The crypto-asset that is the subject of this white paper is available on the Ethereum and Base network.

The following applies to Ethereum:

### 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.

- 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.
- 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.

The following applies to Base:

Base is a Layer-2 solution on Ethereum developed using Optimism's OP Stack. It inherits Ethereum's virtual machine (EVM), allowing developers to deploy smart contracts using standard Ethereum tooling.

The network uses an optimistic rollup architecture: Transactions are executed off-chain and batched by a sequencer, with data submitted to Ethereum L1 for availability and settlement.

Tokens are implemented under the ERC-20 standard, ensuring compatibility with EVM-based wallets and applications.

#### **H.3 Technology used**

The crypto-asset that is the subject of this white paper is available on the Ethereum and Base network.

The following applies to Ethereum:

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.

The following applies to Base:

1. Wallet compatibility: The tokens are supported by all wallets compatible with the Ethereum Virtual Machine (EVM), such as MetaMask, Coinbase Wallet, and Trust Wallet. These wallets interact with Base in the same way as with other EVM-compatible chains, using standard Web3 interfaces.

2. Decentralized Ledger: Base operates as a Layer-2 blockchain on Ethereum and maintains a separate ledger for transaction execution, with periodic commitments to Ethereum Layer 1 for final settlement and data availability.

3. Token: Tokens on Base are implemented under the ERC-20 standard, which is compatible with Ethereum-based interfaces and tooling.

4. Scalability and Transaction Efficiency:

As a rollup-based Layer-2, Base is intended to handle high volumes of transactions with lower fees compared to Ethereum Layer 1. This is enabled by off-chain execution and on-chain data posting via optimistic rollup architecture, which allows transactions to be processed off-chain before final settlement on Ethereum.

#### **H.4 Consensus mechanism**

The crypto-asset that is the subject of this white paper is available on the Ethereum and Base network.

The following applies to Ethereum:

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.

The following applies to Base:

Base does not have its own consensus mechanism (oder von mir aus L2 transactions do not have their own).

A centralised batches L2 transactions and publishes them on the L1 network, i.e. Ethereum. These batches are finalised once included in Ethereum blocks, which are secured via Ethereum's Proof-of-Stake mechanism.

As a result, the security of L2 transactions ultimately depends on Ethereum's consensus layer and the integrity of the sequencer.

#### **H.5 Incentive mechanisms and applicable fees**

The crypto-asset that is the subject of this white paper is available on the Ethereum and Base network.

The following applies to Ethereum:

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.

The following applies to Base:

Base is a Layer-2 (L2) solution on Ethereum that uses optimistic rollups provided by the OP Stack on which it was developed. Transactions on Base are bundled by a so-called sequencer and regularly submitted to Ethereum as a Layer-1 (L1) transaction. This mechanism allows multiple L2 transactions to be included in a single L1 transaction, thereby reducing the average transaction cost per L2 transaction, because many L2 transactions fund the transaction costs for the single L1 transaction. This creates incentives to use Base rather than the L1, i.e. Ethereum, itself.

Transfers of crypto-assets between Base and Ethereum L1 are handled via a special smart contract deployed on Ethereum that governs the bridging process. Since there is no consensus mechanism on L2, withdrawals are subject to a mechanism intended to prevent the release of non-existent funds: To withdraw assets from Base to Ethereum, users must initiate a withdrawal request on L1. This request enters a mandatory challenge period during which any participant may submit a fault proof to dispute the transaction. If the challenge period elapses without dispute, the withdrawal is finalised.

The fault proof mechanism is designed to create economic incentives for correct behaviour and to ensure withdrawals reflect valid L2 transactions. Since Base does not operate its own consensus mechanism, the economic security of the system relies on

the integrity of the underlying L1 (Ethereum) and the incentive structure of the rollup design.

#### **H.6 Use of distributed ledger technology**

No – DLT is not operated by the issuer, the offeror, the person seeking admission to trading, or any third-party acting on their behalf.

#### **H.7 DLT functionality description**

Not applicable, as the DLT is not operated by the issuer, the offeror, the person seeking admission to trading, or any third-party acting on their behalf.

#### **H.8 Audit**

As the term “technology” encompasses a broad range of components, it cannot be confirmed that all elements or aspects of the technology employed have undergone a comprehensive and systematic technical examination. Accordingly, the answer to whether an audit of the technology used has been conducted must be no. This white paper focuses primarily on risk-related aspects and therefore does not imply, nor should it be interpreted as implying, that a full assessment or audit of all technological elements has been conducted.

#### **H.9 Audit outcome**

Not applicable, as no comprehensive audit of the technology used has been conducted or can be confirmed.

### **Part I – Information on risks**

#### **I.1 Offer-related risks**

##### 1. Regulatory and Compliance

Regulatory frameworks applicable to crypto-asset services in the European Union and in third countries are evolving. Supervisory authorities may introduce, interpret, or enforce rules that affect (i) the eligibility of this crypto-asset for admission to trading, (ii) the conditions under which a crypto-asset service provider may offer trading, custody, or

transfer services for it, or (iii) the persons or jurisdictions to which such services may be provided. As a result, the crypto-asset service provider admitting this crypto-asset to trading may be required to suspend, restrict, or terminate trading or withdrawals for regulatory reasons, even if the crypto-asset itself continues to function on its underlying network.

## 2. Trading venue and connection risk

Trading in the crypto-asset depends on the uninterrupted operation of the trading platform admitting it and, where applicable, on its technical connections to external liquidity sources or venues. Interruptions such as system downtime, maintenance, faulty integrations, API changes, or failures at an external venue can temporarily prevent order placement, execution, deposits, or withdrawals, even when the underlying blockchain is functioning. In addition, trading platforms in emerging markets may operate under differing governance, compliance, and oversight standards, which can increase the risk of operational failures or disorderly market conditions.

## 3. Market formation and liquidity conditions

The price and tradability of the crypto-asset depend on actual trading activity on the venues to which the service provider is connected, whether centralized exchanges (CEXs) or decentralized exchanges (DEXs). Trading volumes may at times be low, order books thin, or liquidity concentrated on a single venue. In such conditions, buy or sell orders may not be executed in full or may be executed only at a less favorable price, resulting in slippage.

**Volatility:** The market price of the crypto-asset may fluctuate significantly over short periods, including for reasons that are not linked to changes in the underlying project or protocol. Periods of limited liquidity, shifts in overall market sentiment, or trading on only a small number of CEXs or DEXs can amplify these movements and lead to higher slippage when orders are executed. As a result, investors may be unable to sell the crypto-asset at or close to a previously observed price, even though no negative project-specific event has occurred.

## 4. Counterparty and service-provider dependence

The admission of the crypto-asset to trading may rely on several external parties, such as connected centralized or decentralized trading venues, liquidity providers, brokers, custodians, or technical integrators. If any of these counterparties fail to perform, suspend their services, or apply internal restrictions, the trading, deposit, or withdrawal of the crypto-asset on the admitting service provider can be interrupted or halted.

**Quality of counterparties:** Trading venues and service providers in certain jurisdictions may operate under regulatory or supervisory standards that are lower or differently enforced than those applicable in the European Union. In such environments, deficiencies in governance, risk management, or compliance may remain undetected, which increases the probability of abrupt service interruptions, investigations, or forced wind-downs.

**Delisting and service suspension:** The crypto-asset's availability may depend on the internal listing decisions of these counterparties. A delisting or suspension on a key connected venue can materially reduce liquidity or make trading temporarily impossible on the admitting service provider, even if the underlying crypto-asset continues to function.

**Insolvency of counterparties:** If a counterparty involved in holding, routing, or settling the crypto-asset becomes insolvent, enters restructuring, or is otherwise subject to resolution-type measures, assets held or processed by that counterparty may be frozen, become temporarily unavailable, or be recoverable only in part or not at all, which can result in losses for clients whose positions were maintained through that counterparty. This risk applies in particular where client assets are held on an omnibus basis or where segregation is not fully recognized in the counterparty's jurisdiction.

## 5. Operational and information risks

Due to the irrevocability of blockchain transactions, incorrect approvals or the use of wrong networks or addresses will typically make the transferred funds irrecoverable. Because trading may also rely on technical connections to other venues or service providers, downtime or faulty code in these connections can temporarily block trading, deposits, or withdrawals even when the underlying blockchain is functioning. In addition,

different groups of market participants may have unequal access to technical, governance, or project-related information, which can lead to information asymmetry and place less informed investors at a disadvantage when making trading decisions.

## 6. Market access and liquidity concentration risk

If the crypto-asset is only available on a limited number of trading platforms or through a single market-making entity, this may result in reduced liquidity, greater price volatility, or periods of inaccessibility for retail holders.

### **I.2 Issuer-related risks**

#### 1. Insolvency of the issuer

As with any commercial entity, the issuer may face insolvency risks. These may result from insufficient funding, low market interest, mismanagement, or external shocks (e.g. pandemics, wars). In such a case, ongoing development, support, and governance of the project may cease, potentially affecting the viability and tradability of the crypto-asset.

#### 2. Legal and regulatory risks

The issuer operates in a dynamic and evolving regulatory environment. Failure to comply with applicable laws or regulations in relevant jurisdictions may result in enforcement actions, penalties, or restrictions on the project's operations. These may negatively impact the crypto-asset's availability, market acceptance, or legal status.

#### 3. Operational risks

The issuer may fail to implement adequate internal controls, risk management, or governance processes. This can result in operational disruptions, financial losses, delays in updating the white paper, or reputational damage.

#### 4. Governance and decision-making

The issuer's management body is responsible for key strategic, operational, and disclosure decisions. Ineffective governance, delays in decision-making, or lack of resources may compromise the stability of the project and its compliance with MiCA

requirements. High concentration of decision-making authority or changes in ownership/control can amplify these risks.

#### 5. Reputational risks

The issuer's reputation may be harmed by internal failures, external accusations, or association with illicit activity. Negative publicity can reduce trust in the issuer and impact the perceived legitimacy or value of the crypto-asset.

#### 6. Counterparty dependence

The issuer may depend on third-party providers for certain core functions, such as technology development, marketing, legal advice, or infrastructure. If these partners discontinue their services, change ownership, or underperform, the issuer's ability to operate the project or maintain investor communication may be impaired. This could disrupt project continuity or undermine market confidence, ultimately affecting the crypto-asset's value.

### **I.3 Crypto-assets-related risks**

#### 1. Valuation risk

The crypto-asset does not represent a claim, nor is it backed by physical assets or legal entitlements. Its market value is driven solely by supply and demand dynamics and may fluctuate significantly. In the absence of fundamental value anchors, such assets can lose their entire market value within a very short time. Historical market behaviour has shown that some types of crypto-assets – such as meme coins or purely speculative tokens – have become worthless. Investors should be aware that this crypto-asset may lose all of its value.

#### 2. Market volatility risk

Crypto-asset prices can fluctuate sharply due to changes in market sentiment, macroeconomic conditions, regulatory developments, or technology trends. Such volatility may result in rapid and significant losses. Holders should be prepared for the possibility of losing the full amount invested.

### 3. Liquidity and price-determination risk

Low trading volumes, fragmented trading across venues, or the absence of active market makers can restrict the ability to buy or sell the crypto-asset. In such situations, it is not guaranteed that an observable market price will exist at all times. Spreads may widen materially, and orders may only be executable under unfavourable conditions, which can make liquidation costly or temporarily impossible.

### 4. Asset security risk

Loss or theft of private keys, unauthorised access to wallets, or failures of custodial or exchange service providers can result in the irreversible loss of assets. Because blockchain transactions are final, recovery of funds after a compromise is generally impossible.

### 5. Fraud and scam risk

The pseudonymous and irreversible nature of blockchain transactions can attract fraudulent schemes. Typical forms include fake or unauthorised crypto-assets imitating established ones, phishing attempts, deceptive airdrops, or social-engineering attacks. Investors should exercise caution and verify the authenticity of counterparties and information sources.

### 6. Legal and regulatory reclassification risk

Legislative or regulatory changes in the European Union or in the Member State where the crypto-asset is admitted to trading may alter its legal classification, permitted uses, or tradability. In third countries, the crypto-asset may be treated as a financial instrument or security, which can restrict its offering, trading, or custody.

### 7. Absence of investor protection

The crypto-asset is not covered by investor-compensation or deposit-guarantee schemes. In the event of loss, fraud, or insolvency of a service provider, holders may have no access to recourse mechanisms typically available in regulated financial markets.

## 8. Counterparty risk

Reliance on third-party exchanges, custodians, or intermediaries exposes holders to operational failures, insolvency, or fraud of these parties. Investors should conduct due diligence on service providers, as their failure may lead to the partial or total loss of held assets.

## 9. Reputational risk

Negative publicity related to security incidents, misuse of blockchain technology, or associations with illicit activity can damage public confidence and reduce the crypto-asset's market value.

## 10. Community and sentiment risk

Because the crypto-asset's perceived relevance and expected future use depend largely on community engagement and the prevailing sentiment, a loss of public interest, negative coverage or reduced activity of key contributors can materially reduce market demand.

## 11. Macroeconomic and interest-rate risk

Fluctuations in interest rates, exchange rates, general market conditions, or overall market volatility can influence investor sentiment towards digital assets and affect the crypto-asset's market value.

## 12. Taxation risk

Tax treatment varies across jurisdictions. Holders are individually responsible for complying with all applicable tax laws, including the reporting and payment of taxes arising from the acquisition, holding, or disposal of the crypto-asset.

## 13. Anti-money-laundering and counter-terrorist-financing risk

Wallet addresses or transactions connected to the crypto-asset may be linked to sanctioned or illicit activity. Regulatory responses to such findings may include transfer restrictions, report obligations, or the freezing of assets on certain venues.

## 14. Market-abuse risk

Due to limited oversight and transparency, crypto-assets may be vulnerable to market-abuse practices such as spoofing, pump-and-dump schemes, or insider trading. Such activities can distort prices and expose holders to sudden losses.

#### 15. Legal ownership and jurisdictional risk

Depending on the applicable law, holders of the crypto-asset may not have enforceable ownership rights or effective legal remedies in cases of disputes, fraud, or service failure. In certain jurisdictions, access to exchanges or interfaces may be restricted by regulatory measures, even if on-chain transfer remains technically possible.

#### 16. Concentration risk

A large proportion of the total supply may be held by a small number of holders. This can enable market manipulation, governance dominance, or sudden large-scale liquidations that adversely affect market stability, price levels, and investor confidence.

### **I.4 Project implementation-related risks**

As this white paper relates to the admission to trading of the crypto-asset, the following risk description reflects general implementation risks on the crypto-asset service provider's side typically associated with crypto-asset projects. The party admitting the asset to trading is not involved in the project's implementation and does not assume responsibility for its governance, funding, or execution.

Delays, failures, or changes in the implementation of the project as outlined in its public roadmap or technical documentation may negatively impact the perceived credibility or usability of the crypto-asset. This includes risks related to project governance, resource allocation, technical delivery, and team continuity.

**Key-person risk:** The project may rely on a limited number of individuals for development, maintenance, or strategic direction. The departure, incapacity, or misalignment of these individuals may delay or derail the implementation.

**Timeline and milestone risk:** Project milestones may not be met as announced. Delays in feature releases, protocol upgrades, or external integrations can undermine market confidence and affect the adoption, use, or value of the crypto-asset.

Delivery risk: Even if implemented on time, certain functionalities or integrations may not perform as intended or may be scaled back during execution, limiting the token's practical utility.

## **I.5 Technology-related risks**

As this white paper relates to the admission to trading of the crypto-asset, the following risks concern the underlying distributed ledger technology (DLT), its supporting infrastructure, and related technical dependencies. Failures or vulnerabilities in these systems may affect the availability, integrity, or transferability of the crypto-asset.

### 1. Blockchain dependency risk

The functionality of the crypto-asset depends on the continuous and stable operation of the blockchain(s) on which it is issued. Network congestion, outages, or protocol errors may temporarily or permanently disrupt on-chain transactions. Extended downtime or degradation in network performance can affect trading, settlement, or usability of the crypto-asset.

### 2. Smart contract vulnerability risk

The smart contract that defines the crypto-asset's parameters or governs its transfers may contain coding errors or security vulnerabilities. Exploitation of such weaknesses can result in unintended token minting, permanent loss of funds, or disruption of token functionality. Even after external audits, undetected vulnerabilities may persist due to the immutable nature of deployed code.

### 3. Wallet and key-management risk

The custody of crypto-assets relies on secure private key management. Loss, theft, or compromise of private keys results in irreversible loss of access. Custodians, trading venues, or wallet providers may be targeted by cyberattacks. Compatibility issues between wallet software and changes to the blockchain protocol (e.g. network upgrades) can further limit user access or the ability to transfer the crypto-asset.

Outdated or vulnerable wallet software:

Users relying on outdated, unaudited, or unsupported wallet software may face compatibility issues, security vulnerabilities, or failures when interacting with the blockchain. Failure to update wallet software in line with protocol developments can result in transaction errors, loss of access, or exposure to known exploits.

#### 4. Network security risks

**Attack Risks:** Blockchains may be subject to denial-of-service (DoS) attacks, 51% attacks, or other exploits targeting the consensus mechanism. These can delay transactions, compromise finality, or disrupt the accurate recording of transfers.

**Centralization Concerns:** Despite claims of decentralisation, a relatively small number of validators or a high concentration of stake may increase the risk of collusion, censorship, or coordinated network downtime, which can affect the resilience and operational reliability of the crypto-asset.

#### 5. Bridge and interoperability risk

Where tokens can be bridged or wrapped across multiple blockchains, vulnerabilities in bridge protocols, validator sets, or locking mechanisms may result in loss, duplication, or misrepresentation of assets. Exploits or technical failures in these systems can instantly impact circulating supply, ownership claims, or token fungibility across chains.

#### 6. Forking and protocol-upgrade risk

Network upgrades or disagreements among node operators or validators can result in blockchain “forks”, where the blockchain splits into two or more incompatible versions that continue separately from a shared past. This may lead to duplicate token representations or incompatibilities between exchanges and wallets. Until consensus stabilises, trading or transfers may be disrupted or misaligned. Such situations may be difficult for retail holders to navigate, particularly when trading platforms or wallets display inconsistent token information.

#### 7. Economic-layer and abstraction risk

Mechanisms such as gas relayers, wrapped tokens, or synthetic representations may alter the transaction economics of the underlying token. Changes in transaction costs,

token demand, or utility may reduce its usage and weaken both its economic function and perceived value within its ecosystem.

#### 8. Spam and network-efficiency risk

High volumes of low-value ("dust") or automated transactions may congest the network, slow validation times, inflate ledger size, and raise transaction costs. This can impair performance, reduce throughput, and expose address patterns to analysis, thereby reducing network efficiency and privacy.

#### 9. Front-end and access-interface risk

If users rely on centralised web interfaces or hosted wallets to interact with the blockchain, service outages, malicious compromises, or domain expiries affecting these interfaces may block access to the crypto-asset, even while the blockchain itself remains fully functional. Dependence on single web portals introduces a critical point of failure outside the DLT layer.

#### 10. Decentralisation claim risk

While the technical infrastructure may appear distributed, the actual governance or economic control of the project may lie with a small set of actors. This disconnect between marketing claims and structural reality can lead to regulatory scrutiny, reputational damage, or legal uncertainty – especially if the project is presented as 'community-governed' without substantiation.

#### **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

Morpho Token

#### S.4 Consensus Mechanism

The crypto-asset that is the subject of this white paper is available on the Ethereum and Base network.

The following applies to Ethereum:

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.

The following applies to Base:

Base does not have its own consensus mechanism (oder von mir aus L2 transactions do not have their own).

A centralised batches L2 transactions and publishes them on the L1 network, i.e. Ethereum. These batches are finalised once included in Ethereum blocks, which are secured via Ethereum's Proof-of-Stake mechanism.

As a result, the security of L2 transactions ultimately depends on Ethereum's consensus layer and the integrity of the sequencer.

### **S.5 Incentive Mechanisms and Applicable Fees**

The crypto-asset that is the subject of this white paper is available on the Ethereum and Base network.

The following applies to Ethereum:

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.

The following applies to Base:

Base is a Layer-2 (L2) solution on Ethereum that uses optimistic rollups provided by the OP Stack on which it was developed. Transactions on Base are bundled by a so-called sequencer and regularly submitted to Ethereum as a Layer-1 (L1) transaction. This mechanism allows multiple L2 transactions to be included in a single L1 transaction, thereby reducing the average transaction cost per L2 transaction, because many L2

transactions fund the transaction costs for the single L1 transaction. This creates incentives to use Base rather than the L1, i.e. Ethereum, itself.

Transfers of crypto-assets between Base and Ethereum L1 are handled via a special smart contract deployed on Ethereum that governs the bridging process. Since there is no consensus mechanism on L2, withdrawals are subject to a mechanism intended to prevent the release of non-existent funds: To withdraw assets from Base to Ethereum, users must initiate a withdrawal request on L1. This request enters a mandatory challenge period during which any participant may submit a fault proof to dispute the transaction. If the challenge period elapses without dispute, the withdrawal is finalised.

The fault proof mechanism is designed to create economic incentives for correct behaviour and to ensure withdrawals reflect valid L2 transactions. Since Base does not operate its own consensus mechanism, the economic security of the system relies on the integrity of the underlying L1 (Ethereum) and the incentive structure of the rollup design.

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

2024-12-03

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

2025-12-03

#### **S.8 Energy consumption**

743.90576 kWh/a

#### **S.9 Energy consumption sources and methodologies**

The energy consumption associated with this crypto-asset is aggregated of multiple contributing components, primarily the underlying blockchain network and the execution of token-specific operations. To determine the energy consumption of a token, the energy consumption of the underlying blockchain networks Ethereum and Base is calculated first. A proportionate share of that energy use is then attributed to the token based on its activity level within the network (e.g. transaction volume, contract execution).

The Functionally Fungible Group Digital Token Identifier (FFG DTI) is used to determine all technically equivalent implementations of the crypto-asset in scope.

Estimates regarding hardware types, node distribution, and the number of network participants are based on informed assumptions, supported by best-effort verification against available empirical data. Unless robust evidence suggests otherwise, participants are assumed to act in an economically rational manner. In line with the precautionary principle, conservative estimates are applied where uncertainty exists – that is, estimates tend towards the higher end of potential environmental impact.

#### **S.10 Renewable energy consumption**

26.5386870830 %

#### **S.11 Energy intensity**

0.00005 kWh

#### **S.12 Scope 1 DLT GHG emissions – Controlled**

0.00000 tCO2e/a

#### **S.13 Scope 2 DLT GHG emissions – Purchased**

0.24758 tCO2e/a

#### **S.14 GHG intensity**

0.00002 kgCO2e

#### **S.15 Key energy sources and methodologies**

To determine the proportion of renewable energy used in the operation of the network, node locations are determined using public information sources, open-source node crawlers and proprietary crawling tools. Where no sufficient geographic distribution of nodes is available, reference networks with comparable incentive structures and consensus mechanisms are used for approximation. This geolocation data is then merged with publicly available information sourced from Our World in Data, which draws on datasets from Ember (2025) and the Energy Institute – Statistical Review of

World Energy (2024). Energy intensity is calculated as the marginal energy cost of processing a single additional transaction on the network.

Source(s): 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, "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 greenhouse gas (GHG) emissions associated with the operation of the network, node locations are determined using public information sources, open-source node crawlers and proprietary crawling tools. Where no sufficient geographic distribution of nodes is available, reference networks with comparable incentive structures and consensus mechanisms are used for approximation. This geolocation data is then merged with publicly available information sourced from Our World in Data, which draws on datasets from Ember (2025) and the Energy Institute – Statistical Review of World Energy (2024). Carbon intensity is calculated as the marginal emissions associated with processing a single additional transaction on the network.

Source(s): 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 data]. Retrieved from <https://ourworldindata.org/grapher/carbon-intensity-electricity>.  
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