

**White paper drafted under the  
European Markets in Crypto-  
Assets Regulation (EU)  
2023/1114 for FFG WHX0WGO LT**

## Preamble

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## **01. Date of notification**

This white paper was notified at 2026-01-19.

## **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 Orchid (OXT) referred to in this white paper is a crypto-asset other than EMTs and ARTs, and is issued on the Ethereum network as of 2025-12-08 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 activity in Ethereum can be viewed on 2019-12-03 (transaction hash: 0x76cd7494c90071a4278d6d70313d35363a296f3228a014e01665e99c4894c97b, source <https://etherscan.io/tx/0x76cd7494c90071a4278d6d70313d35363a296f3228a014e01665e99c4894c97b>, accessed 2025-12-08).

The Orchid project is a blockchain-based software project that focuses on the development and operation of a decentralised network architecture intended to facilitate access to virtual private networking (VPN) and related connectivity services. The project combines distributed ledger technology with open-source software components to coordinate interactions between network participants, including service providers and end users, without relying on a single central intermediary.

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 purely technical or operational in nature and do not confer rights comparable to ownership, profit participation, governance, 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 Lange Reihe 73, 20099 Hamburg, Germany,  
federal state Hamburg.

## 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 39120077M9TG001FE242.

## 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 Zölitz	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**

Orchid Labs Inc.

#### **B.3 Legal form**

The legal form of Orchid Labs Inc. is XTIQ, which corresponds to "Corporation".

#### **B.4. Registered address**

The registered address of deBridge Foundation is 182 HOWARD STREET #423, 94105, SAN FRANCISCO,

United States of America

Delaware

#### **B.5 Head office**

The registered address of deBridge Foundation is 182 HOWARD STREET #423, 94105, SAN FRANCISCO,

United States of America

Delaware

## B.6 Registration date

The exact date is unknown, but according to an SEC filing ([https://www.sec.gov/Archives/edgar/data/1721086/000172108618000001/xslFormDX01/primary\\_doc.xml](https://www.sec.gov/Archives/edgar/data/1721086/000172108618000001/xslFormDX01/primary_doc.xml)) , the company was founded in 2017.

## B.7 Legal entity identifier

Orchid Labs Inc. has no Legal Entity Identifier (LEI).

## B.8 Another identifier required pursuant to applicable national law

Could not be found while drafting this white paper (2026-01-08).

## B.9 Parent company

No parent company of Orchid Labs Inc. can be identified.

## B.10 Members of the management body

Identity	Function	Business Address
Steven Waterhouse	Executive Officer & Director	182 HOWARD STREET #423, SAN FRANCISCO, United States of America
Brian Fox	Executive Officer & Director	182 HOWARD STREET #423, SAN FRANCISCO, United States of America
Jay Freeman	Director	182 HOWARD STREET #423, SAN FRANCISCO, United States of America

## B.11 Business activity

Based on publicly available information, the precise scope of the business activities of Orchid Labs Inc. is not fully transparent. However, it appears likely that Orchid Labs Inc. is primarily engaged in the development, maintenance, and coordination of software components related to the Orchid project, including contributions to open-source codebases and technical infrastructure supporting a decentralised networking protocol.

In addition, Orchid Labs Inc. may be involved in activities related to the operation, support, or coordination of network-related services, such as protocol development, network monitoring, and technical support for participants in the Orchid ecosystem. These activities may include research and development, software engineering, and organisational functions related to the ongoing evolution of the protocol.

## B.12 Parent company business activity

Orchid Labs Inc. does not have a parent company. Accordingly, no business activity of a parent company is to be reported in this section.

## **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: "Orchid", Short Name: "OXT" 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 2026-01-17).

### **D.2 Crypto-assets name**

Long Name: "Orchid" 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 2026-01-17).

### **D.3 Abbreviation**

Short Name: "OXT" 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 2026-01-17).

### **D.4 Crypto-asset project description**

The Orchid project is a blockchain-based software project that focuses on the development and operation of a decentralised network architecture intended to facilitate access to virtual private networking (VPN) and related connectivity services. The project combines distributed ledger technology with open-source software components to coordinate interactions between network participants, including service providers and end users, without relying on a single central intermediary.

The Orchid protocol is designed to enable service providers to offer bandwidth or networking services through a decentralised marketplace structure. Smart contracts deployed on public blockchains are used to support certain operational processes, such as interaction rules and settlement logic between participants, subject to the technical constraints of the underlying blockchain networks. The protocol is designed to be interoperable with multiple blockchain environments.

The crypto-asset associated with the Orchid project is integrated into the technical architecture of the protocol and is used within the system to facilitate specific protocol-level processes, including interactions between participants and the execution of predefined technical functions. The crypto-asset does not represent equity, a claim on assets, or governance rights in any legal entity, and does not provide holders with ownership, voting, or profit-participation rights.

The Orchid project is developed and maintained as an open-source initiative, with ongoing development activities subject to technical, operational, and market-related risks. The functionality and adoption of the protocol depend on continued software development, network participation,

and external factors such as regulatory developments and the performance of underlying blockchain infrastructures.

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

Type of person	Name of person	Business address of person	Domicile of company
Other person involved in implementation	Steven Waterhouse	182 HOWARD STREET #423, SAN FRANCISCO	United States of America
Other person involved in implementation	Jay Freeman	182 HOWARD STREET #423, SAN FRANCISCO	United States of America
Other person involved in implementation	Brian J. Fox	182 HOWARD STREET #423, SAN FRANCISCO	United States of America
Other person involved in implementation	Gustav Simonsson	182 HOWARD STREET #423, SAN FRANCISCO	United States of America
Other person involved in implementation	Justin Sheek	182 HOWARD STREET #423, SAN FRANCISCO	United States of America
Other person involved in implementation	Patrick Niemeyer	182 HOWARD STREET #423, SAN FRANCISCO	United States of America
Other person involved in implementation	Dan Montgomery	182 HOWARD STREET #423, SAN FRANCISCO	United States of America
Other person involved in implementation	Patrick Dietzen	182 HOWARD STREET #423, SAN FRANCISCO	United States of America
Other person involved in implementation	Travis Cannell	182 HOWARD STREET #423, SAN FRANCISCO	United States of America

### 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 associated with the Orchid crypto-asset project and a summary of future or anticipated milestones as publicly communicated by parties involved in the project. All forward-looking statements are inherently uncertain and do not constitute commitments, assurances, or guarantees. Planned or anticipated milestones may be modified, delayed, or discontinued, and past developments should not be interpreted as indicators of future outcomes.

Past milestones:

Based on publicly available information, the Orchid project originated as an initiative focused on the development of decentralised networking software, with an emphasis on privacy-preserving connectivity services. Early development phases included the publication of open-source protocol specifications and client software intended to enable decentralised participation by network service providers and users.

Subsequently, the Orchid protocol was deployed using public blockchain infrastructure, and a crypto-asset associated with the project was introduced and made available through public distribution and exchange listings. Over time, additional technical components were released, including client applications, protocol upgrades, and integrations with multiple blockchain environments. Public documentation and repositories indicate ongoing software development, maintenance activities, and iterative improvements to the protocol architecture.

The project has also been publicly associated with the involvement of multiple venture capital firms and individual contributors, suggesting that external resources were made available to support development and operational activities. However, the specific scope, timing, and contractual structure of these contributions are not publicly verifiable.

Future milestones:

With respect to future milestones, publicly available statements and documentation primarily refer to the continued development and refinement of the Orchid protocol and its supporting software components. Anticipated activities include further protocol updates, performance and security improvements, expanded compatibility with blockchain networks, and ongoing maintenance of client applications and infrastructure.

Beyond these general technical objectives, no detailed, time-bound, or externally verifiable roadmap milestones have been publicly disclosed. Any references to future enhancements, adoption, or expanded use cases remain indicative in nature and subject to significant uncertainty. The execution, timing, and scope of potential future developments depend on factors including developer participation, availability of resources, technological constraints, regulatory developments, and market conditions. There is no assurance that any anticipated milestones will be implemented or that they will result in sustained functionality, adoption, or economic relevance of the Orchid crypto-asset.

## **D.9 Resource allocation**

Publicly available information indicates that the project has received financial and/or other forms of support from a number of external investors, including a16z Crypto, Polychain Capital, DHVC, Sequoia Capital, Tokenstack Partners, Jump Capital, Blockchain Capital, Foundation Capital, MetaStable Capital, Crypto Bazar, Zorax Capital, and individual investors or advisors publicly associated with the project. This suggests that several financing rounds or comparable funding arrangements may have occurred during the development of the project.

However, the specific terms of these investments, including the structure and timing of financing rounds, invested amounts, valuation levels, investment vehicles, and contractual conditions, are not publicly disclosed and cannot be independently verified. Consequently, the exact allocation of financial resources within the project is not externally transparent.

Notwithstanding these limitations, it can reasonably be assumed that these investors contributed capital and/or other resources, such as strategic guidance or technical expertise, which were used to support activities including software development, research and development, technical infrastructure, and general operational functions.

## **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**

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

## **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.

### **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 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 intended 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 has established, implemented, and documented comprehensive internal policies and procedures for the identification, prevention, management, and documentation of conflicts of interest in accordance with applicable regulatory requirements. These internal measures are actively applied within the organisation. For the purposes of this specific assessment and the crypto-asset covered by this white paper, a token-specific review has been conducted by Crypto Risk Metrics GmbH. Based on this individual review, no conflicts of interest relevant to this crypto-asset have been identified at the time of preparation of this white paper.

### **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 Orchid crypto-asset is implemented as an ERC-20 token deployed on the Ethereum blockchain. Its functionality is technically defined by the ERC-20 standard and by the smart contract logic governing token issuance, transfer, and balance accounting on the Ethereum network. As such, the crypto-asset can be transferred between compatible blockchain addresses and held in Ethereum-compatible wallets, subject to network conditions and transaction fees determined by the Ethereum protocol.

According to publicly available documentation, the crypto-asset is integrated into the Orchid protocol and may be used within the technical framework of the network to support predefined protocol-level processes, including interactions between network participants. These processes are implemented through smart contracts and client software and are subject to the availability and configuration of the Orchid protocol at a given point in time.

It does not confer ownership rights, governance rights, profit-sharing rights, or claims against any legal entity. The availability, scope, and continued support of its functionalities depend on ongoing software development, technical implementation decisions, and external factors such as network performance and applicable regulatory requirements, and may be modified, restricted, or discontinued.

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

Based on publicly available information, no detailed, time-bound, or binding plans regarding the future application of additional functionalities of the Orchid crypto-asset have been formally disclosed. Public communications and documentation primarily indicate an intention to continue using the crypto-asset within the existing technical framework of the Orchid protocol, subject to ongoing development and maintenance activities.

Any planned application of the crypto-asset's functionalities appears to be limited to its continued technical integration within the protocol as implemented through smart contracts and client software on the Ethereum blockchain. The timing, scope, and specific conditions under which such functionalities may be applied or expanded are not publicly specified and remain dependent on technical feasibility, developer decisions, network participation, and external factors.

There is no publicly verifiable information indicating guaranteed extensions, mandatory future uses, or fixed implementation milestones for additional functionalities. Accordingly, any future application of the crypto-asset's functionalities may be modified, delayed, restricted, or discontinued, and should not be interpreted as a commitment or assurance of continued or expanded use.

**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 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 token 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: "Orchid" 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 2026-01-17).

**F.8 Website of the issuer**

<https://www.orchid.com/>

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

2026-02-17

**F.10 Publication date**

2026-02-17

**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**

QD1L1XC82

## **F.14 Functionally fungible group digital token identifier**

WHX0WGOLT

## **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, Iceland, Ireland, Italy, Latvia, Liechtenstein, Lithuania, Luxembourg, Malta, Netherlands, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden

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

## **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 (2026-01-07).

### **G.5 Issuer retained crypto-assets**

According to publicly available information, the Orchid crypto-asset has a fixed total supply of 1,000,000,000 units issued as an ERC-20 token on the Ethereum blockchain. The total supply is distributed across several allocation categories, including network incentives and ecosystem-related purposes, investor-related allocations, and allocations associated with entities or persons involved in the development and support of the project.

Public disclosures indicate that approximately 51.13% of the total supply is allocated to network incentives and other protocol-related purposes held in the Orchid Treasury. In addition, allocations to early investors were made through multiple Simple Agreements for Future Tokens (SAFTs), comprising approximately 17.3% under a seed SAFT, 4.49% under SAFT 2a, and 3.38% under SAFT 2b. These investor-related allocations together represent approximately 25.17% of the total supply.

Based on this allocation structure, a significant portion of the total supply can be considered issuer-retained in a broader sense, insofar as it remains under the direct or indirect control of entities associated with the project or is subject to predefined release or usage conditions. In particular, the Orchid Treasury allocation of approximately 51.13%, corresponding to around 511,300,000 units, constitutes the primary issuer-retained component. These crypto-assets are earmarked for network incentives and other project-related purposes and are not described as being immediately and freely circulating.

The remaining portion of the supply allocated to investors is subject to contractual arrangements whose specific vesting schedules, lock-ups, or transfer restrictions are not fully transparent based on publicly available information. As a result, while these tokens are not necessarily issuer-retained, their immediate availability and effective circulation cannot be conclusively determined.

It should be noted that blockchain-based token balances do not allow for reliable attribution to identifiable natural or legal persons. Consequently, the precise degree of control exercised by the

issuer or affiliated entities over specific token holdings cannot be independently verified. Token movements, internal reallocations, or secondary market transactions may occur over time and may affect the circulating supply and concentration without prior public disclosure.

## **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 2026-01-03.

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 units according to public information (Source: <https://www.orchid.com/oxt/> 2026-01-08). Investors should note that changes in the supply of the crypto-asset 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. Accordingly, this white paper shall be governed by the laws of the Federal Republic of Germany.

### **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 competent courts in Hamburg, Germany.

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

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

The crypto-asset in scope is implemented on the Ethereum 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 network.

The following applies to Ethereum:

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.

- 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.

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

The crypto asset that is the subject of this white paper is available on the Ethereum 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.

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

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

The following applies to Ethereum:

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 that is the subject of this white paper is available on the Ethereum 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.

## **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.

## **1.2 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

39120077M9TG001FE242

#### S.3 Name of the cryptoasset

Orchid

#### S.4 Consensus Mechanism

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

The following applies to Ethereum:

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 crypto asset that is the subject of this white paper is available on the Ethereum 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.

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

2025-01-17

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

2026-01-17

## **S.8 Energy consumption**

29.62344 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 network Ethereum 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**

31.8059441814 %

## **S.11 Energy intensity**

0.00006 kWh

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

0.00000 tCO<sub>2</sub>e/a



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

0.00206 tCO<sub>2</sub>e/a

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

0.00002 kgCO<sub>2</sub>e

### **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, "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 data]. Retrieved from <https://ourworldindata.org/grapher/carbon-intensity-electricity> Licenced under CC BY 4.0.

