

**White paper drafted under the  
European Markets in Crypto-  
Assets Regulation (EU)  
2023/1114 for FFG WKH09L3DV**

## Preamble

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## **01. Date of notification**

This white paper was notified on 2026-06-18.

## **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 ONDO crypto-asset referred to in this white paper is a crypto-asset other than EMTs and ARTs and is implemented on the Ethereum network as a token under the ERC-20 token standard, according to the DTI FFG shown in section F.14, as of 2026-06-15. The crypto-asset that is the subject of this white paper is the ONDO token with the contract address 0xfAbA6f8e4a5E8Ab82F62fe7C39859FA577269BE3 (source: <https://etherscan.io/token/0xfaba6f8e4a5e8ab82f62fe7c39859fa577269be3>, accessed 2026-06-10). The maximum supply of ONDO is 10,000,000,000 tokens. The first activity of the crypto-asset can be viewed on 2022-04-28 (transaction hash: 0x5fb4e0aa8ce500648fa53e5ab19053859ff9a5f74f8e8f5a7d5fc498e625ce29, source: <https://etherscan.io/tx/0x5fb4e0aa8ce500648fa53e5ab19053859ff9a5f74f8e8f5a7d5fc498e625ce29>, accessed 2026-06-10).

The Ondo project is concerned with the tokenisation of real-world assets, that is, the representation of traditional financial assets such as short-term US government securities on public blockchains. According to publicly available information, the project develops and operates tokenised financial products and supporting infrastructure with the stated aim of making institutional-grade financial products more broadly accessible. The ONDO token itself is not backed by any real-world assets; it is the governance token of the Ondo ecosystem.

ONDO is used to participate in the governance of the Ondo DAO, which governs the Flux Finance lending protocol and manages a treasury of assets. Holders of ONDO may vote on protocol parameters, treasury management and protocol upgrades. The token does not entitle its holders to any yield, redemption, dividend or claim against any entity in the Ondo ecosystem.

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 a 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 the 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,

DE-HH

### A.4 Head office

The head office is identical to the registered address.

### 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 that supports regulated entities in fulfilling their regulatory requirements. Among other services, Crypto Risk Metrics GmbH acts as a data provider for ESG data under Article 66(5). In light of the requirements set out in Articles 4(7), 5(4) and 66(3) 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, 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 on regulatory technology and risk analytics in the context of the MiCA framework – has been developed progressively and can realistically be considered fully operational since approximately 2024.

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

2024 (unaudited): loss of EUR 50,891.81

2023 (unaudited): loss of EUR 27,665.32

2022: profit of EUR 104,283.00

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

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

A fundamental repositioning of the company occurred in 2023 and especially in 2024, when the focus shifted towards 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 preliminary unaudited management information for the financial year 2025, revenues are expected to have exceeded EUR 800,000, while preliminary net profit is expected to exceed EUR 100,000.

These figures are not audited and are not based on a finalised annual financial statement. Accordingly, they remain subject to finalisation and may differ from the figures ultimately reported in the annual financial statements.

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 materialise 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 in tokens from projects it has worked with and – due to its 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**

Ondo Foundation

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

The legal form of Ondo Foundation is K575, which corresponds to "Foundation company".

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

The registered address of Ondo Foundation is c/o Campbells Corporate Services Limited, Floor 4, Willow House, Cricket Square, Grand Cayman, KY1-9010,

Cayman Islands,

KY1

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

Could not be found while drafting this white paper (2026-06-15).

Not applicable.

Not applicable.

### **B.6 Registration date**

The exact date of incorporation could not be determined from publicly available information while drafting this white paper. Based on publicly available information, the Foundation appears to have been established in 2022, although the precise incorporation date could not be verified as at 2026-06-15.

### **B.7 Legal entity identifier**

Could not be found while drafting this white paper (2026-06-15).

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

Could not be found while drafting this white paper (2026-06-15).

### **B.9 Parent company**

Not applicable. The Ondo Foundation is reported to be a non-profit foundation company with no beneficial owners (source: <https://ondo.foundation/about>, accessed 2026-06-15).

### **B.10 Members of the management body**

| <b>Identity</b>    | <b>Function</b>    | <b>Business Address</b> |
|--------------------|--------------------|-------------------------|
| Could not be found | Could not be found | Could not be found      |

### **B.11 Business activity**

Ondo Foundation supports the development and adoption of tokenised real-world assets and their use in on-chain financial protocols, including through ecosystem support, education, strategic partnerships and community engagement. Its activities also include treasury management, deployment of governance tokens and protocol smart contracts, management of certain ecosystem web applications and intellectual property rights (source: Ondo Foundation blog, "Unlocking ONDO: A Proposal from the Ondo Foundation", <https://blog.ondo.foundation/unlocking-ondo-a-proposal-from-the-ondo-foundation/>, accessed 2026-06-15).

### **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: "Ondo", Short Name: "ONDO" 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 2026-06-15).

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

Long Name: "Ondo" 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 2026-06-15).

### **D.3 Abbreviation**

Short Name: "ONDO" 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 2026-06-15).

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

According to publicly available information, the Ondo project is a crypto-asset initiative focused on the tokenisation of real-world assets and the development of related on-chain financial infrastructure (sources: <https://ondo.finance/> and <https://docs.ondo.finance/>, accessed 2026-06-10). The project includes products and protocols relating to tokenised exposure to short-term US Treasuries, tokenised notes for non-US investors, tokenised publicly traded securities, lending against tokenised securities, and blockchain infrastructure designed for tokenised real-world assets.

The project's principal components include OUSG, USDY, Ondo Global Markets, Flux Finance and Ondo Chain. OUSG relates to tokenised exposure to short-term US Treasuries, while USDY is described as a yield-bearing tokenised note for non-US investors. Ondo Global Markets is described as a platform for tokenised publicly traded securities, and Flux Finance is a lending protocol that supports tokenised securities as collateral. Ondo Chain is described as a layer 1 proof-of-stake blockchain developed for tokenised real-world assets; according to publicly available information reviewed while drafting this white paper, Ondo Chain appears to be operating only as a testnet.

The ONDO token functions as the governance instrument of the Ondo DAO and is used in connection with governance of certain elements of the Ondo ecosystem, including Flux Finance and Ondo Chain. The token does not represent ownership of, or a claim against, the Ondo Foundation, Ondo Finance Inc. or any other entity in the Ondo ecosystem. The products and protocols described above are operated or supported by different entities and arrangements within the wider Ondo ecosystem and are not the subject of this white paper; they are described here because the perceived value and relevance of the ONDO token may be affected by the development and adoption of the wider ecosystem.

The future development of the Ondo project depends on governance outcomes and technical, economic and regulatory considerations. Any planned or anticipated developments remain subject to change and should not be understood as commitments, assurances or guarantees.

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

| <b>Name of person</b>       | <b>Type of person</b>                   | <b>Business address of person</b>                                                                                       | <b>Domicile of company</b> |
|-----------------------------|-----------------------------------------|-------------------------------------------------------------------------------------------------------------------------|----------------------------|
| Ondo Foundation             | Other person involved in implementation | c/o Campbells Corporate Services Limited, Floor 4, Willow House, Cricket Square, Grand Cayman, KY1-9010, Cayman Islands | Cayman Islands             |
| Ondo Finance Inc.           | Other person involved in implementation | 228 Park Avenue South, PMB 21427, New York, NY 10003-1502, United States                                                | United States              |
| Flux Finance Inc.           | Other person involved in implementation | Floor 4, Banco Popular Building, Road Town, Tortola, VG1110, British Virgin Islands                                     | British Virgin Islands     |
| Ondo Capital Management LLC | Other person involved in implementation | 228 Park Avenue South, PMB 21427, New York, NY 10003-1502, United States                                                | United States              |
| Justin Schmidt              | Other person involved in implementation | 228 Park Avenue South, PMB 21427, New York, NY 10003-1502, United States                                                | United States              |
| Ian De Bode                 | Other person involved in implementation | 228 Park Avenue South, PMB 21427, New York, NY 10003-1502, United States                                                | United States              |
| Mark Janoff                 | Other person involved in implementation | 228 Park Avenue South, PMB 21427, New York, NY 10003-1502, United States                                                | United States              |

#### **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 a 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 a service supplied solely by the issuer.

## D.8 Plans for the token

This section provides an overview of the historical developments related to the ONDO crypto-asset 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.

No single formally published roadmap for the ONDO token has been identified in publicly available sources; project plans are communicated through the project's websites, blogs and public announcements (sources: <https://ondo.finance/blog> and <https://blog.ondo.foundation/>, accessed 2026-06-10).

Past Milestones:

- Ondo Finance Inc. founded (March 2021): the company was founded in the United States by Nathan Allman and Pinku Surana.
- First products (July 2021): the company released its first product range, yield-bearing vaults and a liquidity-as-a-service offering, under the banner of Ondo V1.
- ONDO token contract deployment (2022-04-28): the ONDO token contract was deployed on Ethereum (transaction hash: 0x5fb4e0aa8ce500648fa53e5ab19053859ff9a5f74f8e8f5a7d5fc498e625ce29).
- Ondo Foundation established (2022): Ondo Finance helped to establish the Ondo Foundation (formerly the Neptune Foundation), which acquired the ONDO token issuance rights as its first act (source: <https://blog.ondo.foundation/unlocking-ondo-a-proposal-from-the-ondo-foundation/>).
- Community Access Sale (May 2022): the Ondo Foundation, through its subsidiaries, sold ONDO tokens to over 18,000 individuals through the CoinList platform.
- Ondo V2, tokenised Treasuries, Flux Finance and the Ondo DAO (January 2023): the project launched the second implementation of its protocol and announced tokenised products collateralised by US Treasuries and corporate bonds; Flux Finance and the Ondo DAO.
- Further product launches (2023 to 2024): additional products were announced, including the Ondo US Dollar Yield token (USDY) and the Ondo bridge service.
- ONDO transferability (2024-01-18): following a vote of the Ondo DAO, the restrictions on transferring the ONDO token were lifted (source: <https://docs.ondo.foundation/ondo-token>, accessed 2026-06-10).

- Ecosystem expansion (2024 to 2025): according to publicly available information, the project expanded its tokenised products across multiple blockchains, including the XRP Ledger (February 2025), and introduced Ondo Global Markets, a platform for tokenised notes linked to publicly traded US securities.
- Ondo Chain testnet (February 2025): According to publicly available information, Ondo Chain is described as a layer 1 proof-of-stake blockchain for tokenised real-world assets and currently operates as a testnet.
- Foundation wallet disclosure (2025-12-05): the Ondo Foundation Group disclosed the wallet address containing the locked ONDO tokens under its control (source: <https://blog.ondo.foundation/ondo-foundation-group-wallet-address-disclosure/>).

#### Future Milestones:

- Continued development and adoption of the Ondo Chain as infrastructure for tokenised real-world assets.

Note: No formally published plan for additional ONDO-specific token functionality was identified while drafting this white paper. All future milestones are subject to significant uncertainty, including but not limited to technical feasibility, regulatory developments, market adoption, and community governance decisions. The project may modify, delay, or discontinue any of these initiatives at any time. Past implementation or performance outcomes do not constitute an indication of future results, and any such changes may materially affect the characteristics, availability, or perceived value of the ONDO crypto-asset for its holders.

## D.9 Resource allocation

Based on information from various third-party and industry sources, it is reported that the crypto-asset project associated with the ONDO token has received financial resources through equity financing raised by Ondo Finance Inc. and through sales of ONDO tokens.

Publicly referenced information indicates that Ondo Finance Inc. raised approximately USD 4,000,000 in seed equity financing and approximately USD 20,000,000 in Series A equity financing. The Series A round was announced in April 2022 and was reported as led by Founders Fund and Pantera Capital, with participation from investors including Coinbase Ventures, GoldenTree, Wintermute, Steel Perlot, Tiger Global and Flow Traders.

Public sources further indicate that the Ondo Foundation, through its subsidiaries, conducted a Community Access Sale of ONDO tokens on CoinList in May 2022. Ondo Finance reported in July 2022 that the sale involved over 18,000 purchasers and raised over USD 10,000,000. The Ondo Foundation documentation describes two CoinList tranches, priced at USD 0.03 and USD 0.055 per ONDO token, subject to lock-up and release periods of one year plus eighteen months and one year plus six months, respectively.

The above information has been derived from publicly available sources and has not been independently confirmed by the issuer, the Ondo Foundation, Ondo Finance Inc. or other entities associated with the ONDO token. In addition, public blockchain address data may not reliably identify the natural or legal persons exercising economic control over specific token balances. Accordingly, the referenced investment amounts, investor participation, token sale proceeds and any implied cumulative funding figures should be considered indicative only.

## **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 maximum supply of the crypto-asset is set at 10,000,000,000 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 any additional restrictions that 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 transaction 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**

MiCA-compliant crypto-asset service providers shall have strong measures in place in order to manage conflicts of interest. Due to the broad audience this white paper addresses, 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) nor 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 crypto-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 it is not subject to any stabilisation mechanism. It is neither pegged to any fiat currency nor backed by any external assets, which distinguishes 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, and therefore remains outside the scope of regulatory frameworks applicable to traditional financial instruments.

### **F.2 Crypto-asset functionality**

According to publicly available information (sources: <https://docs.ondo.foundation/> and <https://blog.ondo.foundation/unlocking-ondo-a-proposal-from-the-ondo-foundation/>, accessed 2026-06-10), the ONDO token is the governance token of the Ondo DAO and of Flux Finance, a lending protocol governed by the Ondo DAO. ONDO is an ERC-20 token on the Ethereum network and has been freely transferable since 2024-01-18.

Holders of ONDO may participate in the governance of the Ondo DAO by voting on proposals. With respect to Flux Finance, these governance rights include the listing of new fToken markets, the pausing of fToken markets, the updating of the interest rate model per market, the updating of the oracle address, and the withdrawal of the reserves of an fToken market. The Ondo DAO further has the rights to choose a new administrator, to manage a treasury of assets, to control ONDO

emissions, and to call arbitrary functions through governance (source: <https://blog.ondo.foundation/unlocking-ondo-a-proposal-from-the-ondo-foundation/>, accessed 2026-06-10).

The ONDO token does not confer ownership, profit participation, governance rights over the issuer or any related entity in a corporate-law sense, or any form of legally enforceable economic entitlement. All functionalities are technical in nature and relate exclusively to interactions within the Ondo protocol environment. The actual usability of ONDO depends on factors such as system stability, governance decisions, development progress and the operational conditions of the Ethereum blockchain, which are outside the control of token holders.

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

Future Milestones:

- Continued development and adoption of the Ondo Chain as infrastructure for tokenised real-world assets.

Note: No formally published plan for additional ONDO-specific token functionality was identified while drafting this white paper. All future milestones are subject to significant uncertainty, including but not limited to technical feasibility, regulatory developments, market adoption, and community governance decisions. The project may modify, delay, or discontinue any of these initiatives at any time. Past implementation or performance outcomes do not constitute an indication of future results, and any such changes may materially affect the characteristics, availability, or perceived value of the ONDO crypto-asset for its holders.

### **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, which stands for "New".

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

The crypto-asset referred to herein is a crypto-asset other than EMTs and ARTs and is currently 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: "Ondo" 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 2026-06-15).

**F.8 Website of the issuer**

<https://ondo.foundation/>

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

2026-07-17

**F.10 Publication date**

2026-07-17

**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**

8DM439GVJ

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

WKH09L3DV

**F.15 Voluntary data flag**

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

**F.16 Personal data flag**

Yes, this white paper contains personal data as defined in Regulation (EU) 2016/679 (the 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 legally enforceable claim against the issuer of the crypto-asset or any third party.

### G.2 Exercise of rights and obligations

As the crypto-asset does not confer 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 project's technical infrastructure – such as participation mechanisms or protocol-level features – serves operational purposes only and does not create, evidence, or constitute 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 for modifying such rights or obligations. 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 rights exist and no rights arise under applicable law or regulation. 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 was not available at the time of writing this white paper (2026-06-15).

### G.5 Issuer retained crypto-assets

According to the Ondo Foundation Group's wallet address disclosure of 5 December 2025, the issuer and its group disclosed 5,874,693,616 locked ONDO tokens under the control of the Ondo Foundation Group, corresponding to approximately 58.7% of the maximum supply of 10,000,000,000 ONDO, held at the Ethereum address 0x677FD4Ed8aE623f2f625DEB2D64F2070E46cA1A1 (source: <https://blog.ondo.foundation/ondo-foundation-group-wallet-address-disclosure/>, accessed 2026-06-10). As observed from publicly available on-chain information for the same Ethereum address on 2026-06-10, the address held 5,629,207,574.15714 ONDO, corresponding to approximately 56.3% of the maximum supply. The disclosed token allocations include the Ecosystem Growth allocation of 5,210,869,545 ONDO, corresponding to approximately 52.1% of the maximum supply, as well as allocations for Protocol Development and Private Sales. According to the Ondo Foundation's published unlock proposal, more than 85% of ONDO tokens were initially subject to lock-up arrangements, with locked tokens scheduled to unlock 12, 24, 36, 48 and 60 months after the initial token unlock of 2024-01-18

(source: <https://blog.ondo.foundation/unlocking-ondo-a-proposal-from-the-ondo-foundation/>, accessed 2026-06-10). The 12-month and 24-month tranches under this schedule have already unlocked as at the date of this white paper.

The information presented above is based on the issuer's own published disclosures and publicly available on-chain information, reflects the disclosed position as at 2025-12-05 and the observed on-chain balance as at 2026-06-10, and should be considered indicative only. Future unlocks, transfers or disposals by the issuer or its group may materially change these holdings and can negatively impact the investor.

## **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 2026-06-15.

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**

Not applicable.

## **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 be brought before the competent courts in Hamburg, Germany.

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

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

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 defined set of protocols and technical standards that are intended to ensure its security, decentralisation, and functionality. Key items are set out below.

### **1. Network protocols**

Ethereum operates as a decentralised, peer-to-peer network. Nodes communicate using the DevP2P networking stack, with RLPx as the encrypted transport layer for peer-to-peer messages.

Transaction ordering and finality are secured through a Proof-of-Stake (PoS) consensus mechanism. Validators on the Beacon Chain propose blocks, attest to them, and finalise them through Casper FFG operating on top of the LMD-GHOST fork-choice rule. Smart contract execution is performed by the Ethereum Virtual Machine (EVM), which interprets EVM bytecode within the gas limits set by the protocol and by the transaction sender.

## 2. Transaction and address standards

Ethereum addresses are 20-byte identifiers, derived as the last 20 bytes of the Keccak-256 hash of the uncompressed elliptic-curve public key (excluding the 0x04 prefix). They are commonly represented as 40-character hexadecimal strings with a 0x prefix and an optional EIP-55 mixed-case checksum.

The protocol currently supports the following transaction types:

- Type 0: legacy transactions (pre-EIP-1559).
- Type 1: access-list transactions (EIP-2930).
- Type 2: dynamic-fee transactions with base-fee burning (EIP-1559).
- Type 3: blob-carrying transactions (EIP-4844), introduced with the Dencun upgrade on 2024-03-13.
- Type 4: set-code transactions (EIP-7702), introduced with the Pectra upgrade on 2025-05-07, allow externally owned accounts (EOAs) to authorise delegated code execution during transactions, without permanently converting the account into a smart contract. This enables features such as transaction batching, sponsored gas payments and delegated signing.

## 3. Blockchain data structure and block standards

The Ethereum state consists of accounts (externally owned accounts and smart contracts) together with their associated storage and code, organised in Modified Merkle Patricia Tries to allow efficient verification.

Each block contains:

- a block header, comprising the parent hash, state root, transactions root, receipts root, timestamp, gas limit, gas used, and the proposer's signature, among other fields;
- the ordered list of transactions, including smart-contract executions and value transfers; and
- blob commitments, where applicable, referring to data published to the data availability layer under EIP-4844.

Block size is not fixed in bytes. It is constrained by a per-block gas limit, which is adjustable within protocol-defined bounds and currently targets approximately 60 million gas following EIP-7935 (Fusaka, activated on 2025-12-03). EIP-7825 (Fusaka) also introduces a per-transaction gas cap of 16,777,216 gas to improve block composability and resilience against denial-of-service patterns.

The data availability layer used by Layer 2 rollups, introduced through EIP-4844, was further developed by EIP-7691 (Pectra, 2025-05-07), which raised the maximum number of blob commitments per block, and by EIP-7594 (Fusaka, 2025-12-03), which introduced Peer Data Availability Sampling (PeerDAS). PeerDAS enables nodes to verify that blob data has been published by sampling small portions of it, rather than downloading every blob in full. Following PeerDAS, Ethereum uses Blob Parameter Only (BPO) forks, introduced by EIP-7892, to adjust blob targets and maxima between major upgrades.

#### 4. Upgrade and improvement standards

Ethereum protocol upgrades are coordinated through the Ethereum Improvement Proposal (EIP) process. EIPs are published openly, reviewed by core developers and the wider community, and bundled into named hard-fork upgrades. The most recent network upgrades are the Pectra upgrade (2025-05-07) and the Fusaka upgrade (2025-12-03). The next named upgrade currently under preparation by the Ethereum core developers is referred to as Glamsterdam.

### 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. Decentralised Ledger: The Ethereum blockchain acts as a decentralised ledger for all ETH transactions, maintaining an append-only record of transfers and account balances to support transparency and verifiable settlement.
2. Account Model: Ethereum uses two account types: externally owned accounts (EOAs), which are controlled through private keys, and contract accounts, which are controlled through deployed smart contract code. Following the Pectra upgrade on 2025-05-07, EOAs can additionally authorise delegated code execution through EIP-7702 transactions without permanently converting the account into smart contracts.
3. Private Key Management: Users must securely store the private keys and recovery material associated with their wallets. Loss or compromise of a private key may result in irreversible loss of access to the associated ETH balance.
4. Cryptographic Integrity: Ethereum uses ECDSA over the secp256k1 elliptic curve for key generation and digital signatures on the execution layer. Keccak-256 hashing is used for transaction hashing, state hashing and address derivation. Ethereum addresses are derived from the last 20 bytes of the Keccak-256 hash of the public key. On the consensus layer, BLS (Boneh-Lynn-Shacham) signatures are used to aggregate validator attestations under the Proof-of-Stake consensus mechanism.

## **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:

Ethereum uses a Proof-of-Stake (PoS) consensus mechanism introduced with The Merge on 2022-09-15, which replaced the previous Proof-of-Work consensus model. The PoS mechanism is implemented through Gasper, combining Casper-FFG for finality with the LMD-GHOST fork-choice rule for chain selection. Validators participate in consensus by staking ETH through the Beacon Chain. Validators are pseudo-randomly selected to propose new blocks, while other validators attest to the validity of proposed blocks. The network operates using 12-second slots grouped into epochs of 32 slots. Under normal network conditions, finality is typically achieved after two epochs, approximately 12.8 minutes, through Casper-FFG. The LMD-GHOST fork-choice rule determines the canonical chain based on the accumulated weight of validator attestations. Validators that engage in certain malicious behaviour, such as equivocation or contradictory attestations, may be subject to slashing penalties, while offline validators may incur inactivity penalties. Subsequent network upgrades, including Dencun (2024-03-13), Pectra (2025-05-07) and Fusaka (2025-12-03), introduced protocol changes affecting Ethereum's consensus mechanism and Layer 2 functionality.

## **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:

Ethereum's Proof-of-Stake (PoS) mechanism secures the network through validator incentives and protocol-defined penalties. Validators are required to stake ETH in order to participate in block proposal and attestation activities. A minimum of 32 ETH is required to activate a validator. Following the Pectra upgrade on 2025-05-07, EIP-7251 increased the maximum effective balance per validator from 32 ETH to 2,048 ETH. Validators may receive protocol-defined rewards for proposing blocks, attesting to valid blocks and participating in sync committees. Rewards consist of newly issued ETH and transaction-related fees. Transaction fees on Ethereum follow the mechanism introduced by EIP-1559, under which each transaction includes a base fee that is burned at the protocol level and an optional priority fee paid to the validator proposing the relevant block. Validators that engage in certain malicious behaviour, including equivocation or contradictory attestations, may be subject to slashing penalties. Validators that fail to participate correctly in consensus activities may also incur inactivity penalties. These mechanisms are intended to support validator participation and the economic security of the Ethereum network.

## **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**

Given the breadth of the term “technology”, it cannot be confirmed that all elements or aspects of the technology employed have undergone a comprehensive and systematic technical examination. Accordingly, no comprehensive audit of the technology used can be confirmed. 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 venues on which it is listed 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 centralised exchanges (CEXs) or decentralised 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 favourable 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 where 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 centralised or decentralised 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 listing crypto-asset 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 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 recognised in the counterparty's jurisdiction.

#### 5. Operational and information risks

Due to the irrevocability of blockchain transactions, incorrect transaction 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, armed conflicts). 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 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. Crypto-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, reporting 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 admission to trading of the crypto-asset, the risk description below reflects general implementation risks typically associated with crypto-asset projects and relevant for the crypto-asset service provider. The party admitting the crypto-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 crypto-asset's practical utility.

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

As this white paper relates to 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 the 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.

Centralisation 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 crypto-asset**

Ondo

#### **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:

Ethereum uses a Proof-of-Stake (PoS) consensus mechanism introduced with The Merge on 2022-09-15, which replaced the previous Proof-of-Work consensus model. The PoS mechanism is implemented through Gasper, combining Casper-FFG for finality with the LMD-GHOST fork-choice rule for chain selection. Validators participate in consensus by staking ETH through the Beacon Chain. Validators are pseudo-randomly selected to propose new blocks, while other validators attest to the validity of proposed blocks. The network operates using 12-second slots grouped into epochs of 32 slots. Under normal network conditions, finality is typically achieved after two epochs, approximately 12.8 minutes, through Casper-FFG. The LMD-GHOST fork-choice rule determines the canonical chain based on the accumulated weight of validator attestations. Validators that engage in certain malicious behaviour, such as equivocation or contradictory attestations, may be subject to slashing penalties, while offline validators may incur inactivity penalties. Subsequent network upgrades, including Dencun (2024-03-13), Pectra (2025-05-07) and Fusaka (2025-12-03), introduced protocol changes affecting Ethereum's consensus mechanism and Layer 2 functionality.

#### **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:

Ethereum's Proof-of-Stake (PoS) mechanism secures the network through validator incentives and protocol-defined penalties. Validators are required to stake ETH in order to participate in block proposal and attestation activities. A minimum of 32 ETH is required to activate a validator. Following the Pectra upgrade on 2025-05-07, EIP-7251 increased the maximum effective balance per validator from 32 ETH to 2,048 ETH. Validators may receive protocol-defined rewards for proposing blocks, attesting to valid blocks and participating in sync committees. Rewards consist of newly issued ETH and transaction-related fees. Transaction fees on Ethereum follow the mechanism



introduced by EIP-1559, under which each transaction includes a base fee that is burned at the protocol level and an optional priority fee paid to the validator proposing the relevant block. Validators that engage in certain malicious behaviour, including equivocation or contradictory attestations, may be subject to slashing penalties. Validators that fail to participate correctly in consensus activities may also incur inactivity penalties. These mechanisms are intended to support validator participation and the economic security of the Ethereum network.

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

2025-06-17

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

2026-06-17

## **S.8 Energy consumption**

1871.43505 kWh/a

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

The energy consumption associated with this crypto-asset is aggregated from 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**

37.9124101186 %

## **S.11 Energy intensity**

0.00007 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**

0.62284 tCO<sub>2</sub>e/a

## S.14 GHG intensity

0.00001 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 incentivisation 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 incentivisation 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> licensed under CC BY 4.0.

