0	**Table of content**	Date of notification Statement in accordance with Article 6(3) of Regulation (EU) 2023/1114 Compliance statement in accordance with Article 6(6) of Regulation (EU) 2023/1114 Statement in accordance with Article 6(5), points (a), (b), (c) of Regulation (EU) 2023/1114 Statement in accordance with Article 6(5), point (d) of Regulation (EU) 2023/1114 Statement in accordance with Article 6(5), points (e) and (f) of Regulation (EU) 2023/1114 SUMMARY Warning in accordance with Article 6(7), second subparagraph of Regulation (EU) 2023/1114 Characteristics of the crypto-asset Key information about the offer to the public or admission to trading Part A - Information about the offeror or the person seeking admission to trading Name Legal form Registered address Head office Registration Date Legal entity identifier Another identifier required pursuant to applicable national law Contact telephone number E-mail address Response Time (Days) Parent Company Members of the Management body Business Activity Parent Company Business Activity Newly Established Financial condition for the past three years Financial condition since registration Part B - Information about the issuer, if different from the offeror or person seeking admission to trading Issuer different from offeror or person seeking admission to trading Name Legal form Registered address Head office

		Registration Date Legal entity identifier Another identifier required pursuant to applicable national law Parent Company Members of the Management body Business Activity Parent Company Business Activity 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 Name Legal form Registered address Head office Registration Date Legal entity identifier of the operator of the trading platform Another identifier required pursuant to applicable national law Parent Company Reason for Crypto-Asset White Paper Preparation Members of the Management body Operator Business Activity Parent Company Business Activity Other persons drawing up the crypto- asset white paper according to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114 Reason for drawing the white paper by persons referred to in Article 6(1), second subparagraph, of Regulation (EU) 2023/1114 Part D - Information about the crypto-asset project Crypto-asset project name Crypto-assets name Abbreviation Crypto-asset project description Details of all natural or legal persons involved in the implementation of the crypto-asset project Utility Token Classification Key Features of Goods/Services for Utility Token Projects Plans for the token Resource Allocation Planned Use of Collected Funds or Crypto-Assets

		Part E - Information about the offer to the public of crypto-assets or their admission to trading Public Offering or Admission to trading Reasons for Public Offer or Admission to trading Fundraising Target Minimum Subscription Goals Maximum Subscription Goal Oversubscription Acceptance Oversubscription Allocation Issue Price Official currency or any other crypto- assets determining the issue price Subscription fee Offer Price Determination Method Total Number of Offered/Traded Crypto- Assets Targeted Holders Holder restrictions Reimbursement Notice Refund Mechanism Refund Timeline Offer Phases Early Purchase Discount Time-limited offer Subscription period beginning Subscription period end Safeguarding Arrangements for Offered Funds/Crypto-Assets Payment Methods for Crypto-Asset Purchase Value Transfer Methods for Reimbursement Right of Withdrawal Transfer of Purchased Crypto-Assets Transfer Time Schedule Purchaser's Technical Requirements Crypto-asset service provider (CASP) name CASP identifier Placement form Trading Platforms name Trading Platforms Market Identifier Code (MIC) Trading Platforms Access Involved costs Offer Expenses Conflicts of Interest Applicable law Competent court Part F - Information about the crypto-assets Crypto-Asset Type

		Crypto-Asset Functionality Planned Application of Functionalities 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 Type of white paper The type of submission Crypto-Asset Characteristics Commercial name or trading name Website of the issuer Starting date of offer to the public or admission to trading Publication date Any other services provided by the issuer Identifier of operator of the trading platform Language or languages of the white paper Digital Token Identifier Code used to uniquely identify the crypto-asset or each of the several crypto assets to which the white paper relates, where available Functionally Fungible Group Digital Token Identifier, where available Voluntary data flag Personal data flag LEI eligibility Home Member State Host Member States Part G - Information on the rights and obligations attached to the crypto-assets Purchaser Rights and Obligations Exercise of Rights and obligations Conditions for modifications of rights and obligations Future Public Offers Issuer Retained Crypto-Assets Utility Token Classification Key Features of Goods/Services of Utility Tokens Utility Tokens Redemption Non-Trading request Crypto-Assets purchase or sale modalities Crypto-Assets Transfer Restrictions Supply Adjustment Protocols Supply Adjustment Mechanisms Token Value Protection Schemes Token Value Protection Schemes Description Compensation Schemes

		Compensation Schemes Description Applicable law Competent court Part H – Information on the underlying technology Distributed ledger technology Protocols and technical standards Technology Used Consensus Mechanism Incentive Mechanisms and Applicable Fees Use of Distributed Ledger Technology DLT Functionality Description Audit Audit outcome Part I – Information on risks Offer-Related Risks Issuer-Related Risks Crypto-Assets-related Risks Project Implementation-Related Risks Technology-Related Risks Mitigation measures Part J – Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts Name Relevant legal entity identifier Name of the crypto-asset Consensus Mechanism Incentive Mechanisms and Applicable Fees Beginning of the Period to which the Disclosed Information Relates End of the Period to which the Disclosed Information Relates Mandatory key indicator on energy consumption Energy Consumption Sources and methodologies Energy Consumption Sources and Methodologies Supplementary key indicators on energy and GHG emissions Renewable energy consumption Energy intensity Scope 1 DLT GHG emissions – Controlled Scope 2 DLT GHG emissions – Purchased GHG intensity Sources and methodologies Key energy sources and methodologies Key GHG sources and methodologies
1	**Date of notification**	2025/10/19

2	**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.
3	**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 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.
4	**Statement in accordance with Article 6(5), points (a), (b), (c) of Regulation (EU) 2023/1114**	The crypto-asset referred to in this white paper may lose its value in part or in full, may not always be transferable and may not be liquid.
5	**Statement in accordance with Article 6(5), point (d) of Regulation (EU) 2023/1114**	FALSE
6	**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. The crypto-asset referred to in this white paper is not covered by the deposit guarantee schemes under Directive 2014/49/EU of the European Parliament and of the Council.
SUMMARY		
7	**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 (36) or any other offer document pursuant to Union or national law.
8	**Characteristics of the crypto-asset**	BTT (the "***Token***") is the utility and governance token of BitTorrent Chain (the "***Network***"), a layer 2 ("***L2***") scaling solution that scales and connects different blockchains. The Token was initially launched as a TRC-20 token on Tron. Once the Network was launched in December 2021, the Token underwent a redenomination process and was launched on the Network to serve as its native token. Within Tron, the Token covers staking and rewards purposes. In this context, Token holders can stake their tokens with the Network validators to contribute to the Network's consensus mechanism. Delegators are rewarded with the Token based on their staked amount. Validators must stake at least 1 trillion tokens to participate in the Network's consensus mechanism by validating transactions and creating new blocks. Validators are compensated with the Token in exchange for their work. Within the Network, the Token serves to pay for transaction fees and governance purposes. Users who interact with the Network by deploying smart contracts or executing transactions must pay gas fees with the Token. The Token also serves as the Network governance token. The Network governance is in the hands of its validators, who participate by voting on proposals. Each validator has equal voting weight regardless of their staked amount. The Token is also used to compensate host nodes of the BitTorrent File System ("***BTFS***") for the storage services they provide. The BTFS is a decentralised storage protocol developed within the Network's ecosystem that tackles storage limitations of traditional blockchains with a cost-effective and scalable solution for data storage and sharing through a peer-to-peer network. Any modifications to the Token's characteristics, rights, or obligations are implemented through protocol updates. These upgrades are approved or rejected by governance decisions made by the Network's validators. Validators vote on proposals related to Network parameter adjustments, protocol upgrades, and operational decisions such as changes to the fee structure and validators' slot allocations, which are then implemented as protocol upgrades.

		Changes to the protocol and Token mechanics are to be communicated through the Network's official channels and its documentation.
09		Not applicable
10	**Key information about the offer to the public or admission to trading**	BitTorrent Tech Limited (the "***Person Seeking Admission to Trading***") is seeking the admission of the Token to trading on multiple EU regulated trading platforms (the "***Exchanges***"). The listing price will be the same as the existing publicly traded Token price across other centralised trading platforms where the Token is currently listed.
Part A - Information about the offeror or the person seeking admission to trading		
A.1	**Name**	BitTorrent Tech Limited
A.2	**Legal form**	Company limited by shares
A.3	**Registered address**	Sea Meadow House, (P.O. Box 116), Road Town, Tortola, British Virgin Islands.
A.4	**Head office**	Sea Meadow House, (P.O. Box 116), Road Town, Tortola, British Virgin Islands.
A.5	**Registration Date**	2024/06/13
A.6	**Legal entity identifier**	Not available
A.7	**Another identifier required pursuant to applicable national law**	2150978
A.8	**Contact telephone number**	13612983101
A.9	**E-mail address**	bttc_support@bittorrent.com
A.10	**Response Time (Days)**	Daily
A.11	**Parent Company**	The Person Seeking Admission to Trading has no parent company.
A.12	**Members of the Management body**	**YANG, Zi** Director Sea Meadow House, (P.O. Box 116), Road Town, Tortola, British Virgin Islands bttc_support@bittorrent.com
A.13	**Business Activity**	The Person Seeking Admission to Trading operates as a core part of the BitTorrent ecosystem, integrating blockchain technology with its existing peer-to-peer file-sharing services and distributed user base to build a decentralized content and data ecosystem.
A.14	**Parent Company Business Activity**	Not applicable
A.15	**Newly Established**	TRUE
A.16	**Financial condition for the past three years**	Not applicable

A.17	**Financial condition since registration**	Since the date of its registration, BitTorrent Tech Limited does not engage in public-facing or commercial activities and has not generated revenue since incorporation. This review provides a fair and balanced assessment of the development, performance, and financial position of BitTorrent Tech Limited from the date of registration to the latest available interim period, in line with the size and operational scope of the entity. The entity has been fully funded through capital contributions from affiliated individuals and/or entities. These internal contributions have been sufficient to cover all operating expenditures to date, which primarily relate to the professional services (e.g. legal, audit, and regulatory), and administrative support. No third-party financing or external debt instruments have been used. The company has incurred some administrative costs since incorporation and there have been no unusual, infrequent, or exceptional events materially affecting its income or financial condition during this time. At present, BitTorrent Tech Limited does not have any confirmed financial projections or plans to begin generating income. The entity's role continues to be strictly internal and infrastructure-focused. Should this change in the future, relevant financial forecasts and disclosures will be updated accordingly. The entity does not report non-financial Key Performance Indicators (KPIs), as it does not operate in external markets and has no user-facing, customer, or product engagement metrics relevant to its function. Where available, this assessment may be supplemented with references to internal financial statements, although the nature and scale of the entity do not currently require standalone statutory reporting.
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**	TRUE
B.2	**Name**	BitTorrent Foundation Ltd.

B.3	**Legal form**	Public Company Limited by Guarantee
B.4	**Registered address**	Singapore under the Companies Act, Cap. 50
B.5	**Head office**	Not applicable
B.6	**Registration Date**	2018/10/04
B.7	**Legal entity identifier**	201834072D
B.8	**Another identifier required pursuant to applicable national law**	Not applicable
B.9	**Parent Company**	Not applicable
B.10	**Members of the Management body**	**Jiang Yiying** Director B101, Yaxinju Jinhui Xinyuan, Longfeng Street, Eling South Road, Huicheng District, Huizhou City, Guangdong, China **Ng Lay Kian** Director 10 Anson Road, #12-08, International Plaza, Singapore (079903) **Tan Yee Soon** Director 10 Anson Road, #12-08, International Plaza, Singapore (079903)
B.11	**Business Activity**	Other information technology and computer service activities (e.g. disaster recovery services) (62090)
B.12	**Parent Company Business Activity**	Not applicable
Part C - Information about the operator of the trading platform in cases where it draws up the crypto-asset white paper and information about other persons drawing the crypto-asset white paper pursuant to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114		
C.1	**Name**	Not applicable
C.2	**Legal form**	Not applicable
C.3	**Registered address**	Not applicable
C.4	**Head office**	Not applicable
C.5	**Registration Date**	Not applicable
C.6	**Legal entity identifier of the operator of the trading platform**	Not applicable
C.7	**Another identifier required pursuant to applicable national law**	Not applicable
C.8	**Parent Company**	Not applicable
C.9	**Reason for Crypto-Asset White Paper Preparation**	Not applicable
C.10	**Members of the Management body**	Not applicable

C.11	**Operator Business Activity**	Not applicable
C.12	**Parent Company Business Activity**	Not applicable
C.13	**Other persons drawing up the crypto- asset white paper according to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114**	Not applicable
C.14	**Reason for drawing the white paper by persons referred to in Article 6(1), second subparagraph, of Regulation (EU) 2023/1114**	Not applicable
Part D - Information about the crypto-asset project		
D.1	**Crypto-asset project name**	BitTorrent Chain
D.2	**Crypto-assets name**	BitTorrent Token
D.3	**Abbreviation**	BTT
D.4	**Crypto-asset project description**	The Network is an L2 scaling solution that scales and connects different blockchains. The Network is designed upon a three-layer architecture that consists of the root contracts, the delivery chain, and the BTTC Chain. The root contracts serve as the entry points to the Network and are deployed on Tron, Ethereum, and BSC. These smart contracts enable cross-chain transactions and state synchronisation between these blockchains by handling token lockup in the origin chain and releasing it in the destination chain as part of its bridging system. The Network's staking mechanism is handled by the root contracts deployed on Tron. Therefore, on this chain users delegate their Tokens, and the staking rewards are distributed. The delivery chain is the consensus layer, which relies on a PoS model to validate cross-chain transactions and generate checkpoints. Lastly, the BTTC Chain functions as the execution layer, equipped with an EVM-compatible environment to host smart contracts. The Network's consensus mechanism relies on validators, which are in charge of validating the Network's transactions

		and creating its new blocks. Validators must stake at least 1 trillion Tokens to participate in the Network's consensus mechanism. They are compensated with the Token, sourced from signature rewards for signing checkpoints on the delivery chain (10% of staking rewards) and block rewards for producing Network blocks (90% of staking rewards). Validators also participate in the Network's governance by voting on proposals to update the Network and its parameters. Each validator has equal voting weight regardless of their stake amount. The Network is integrated with the BitTorrent File System, a decentralised storage solution that hosts peer-to-peer file sharing. BTFS relies on a network of host nodes that provide storage services and rental nodes that upload files, creating a decentralised marketplace for data storage. Host nodes are compensated with the Token for their storage services, while rental nodes pay fees using WBTT, a wrapped version of the Token, to upload files.
D.5	**Details of all natural or legal persons involved in the implementation of the crypto-asset project**	**Robin Lai** Developer of BTTC Sea Meadow House, (P.O. Box 116), Road Town, Tortola, British Virgin Islands 3 years working experience as the Senior Data Architect at Ele.me, the biggest Food delivery platform in China, Led the design and optimization of large-scale data architecture, improving data processing efficiency and supporting business intelligence across the platform.
D.6	**Utility Token Classification**	FALSE
D.7	**Key Features of Goods/Services for Utility Token Projects**	Not applicable
D.8	**Plans for the token**	The Token was initially launched as a TRC-20 token on Tron. In December 2021, when the Network was introduced, the Token was also launched on the Network to serve as its utility token. Additionally, with the Network launch, the Token underwent a redenomination process at a ratio of 1:1000. Therefore, its total supply increased from 990 billion to 990 trillion Tokens. The Network development followed a structured roadmap divided into four phases: • Phase 1, completed in December 2021, consisted of the mainnet launch. Within this phase, the multi-chain

		connectivity was established with wallet functionality, cross-chain bridges, explorer, and staking functionalities. This phase deployed cross-chain bridges to connect Tron, Ethereum, and BSC. • Phase 2, was focused on recruiting developers to build applications on the Network's EVM-compatible infrastructure. • Phase 3 introduced the validator election mechanism and more projects to build a diversified dApp ecosystem to support inter-connectivity among the supported blockchains. • Phase 4, the next phase currently being undertaken, is focused on expanding support to additional blockchains such as Arbitrum, Polygon, zkSync, and Avalanche, pursuing the goal of connecting all chains.
D.9	**Resource Allocation**	Not applicable
D.10	**Planned Use of Collected Funds or Crypto-Assets**	Not applicable
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**	ATTR
E.2	**Reasons for Public Offer or Admission to trading**	Admission to trading of the Token is being sought on multiple EU Exchanges with the aim to facilitate the acquisition of the Token for governance participation and usage of the Network.
E.3	**Fundraising Target**	Not applicable
E.4	**Minimum Subscription Goals**	Not applicable
E.5	**Maximum Subscription Goal**	Not applicable
E.6	**Oversubscription Acceptance**	FALSE
E.7	**Oversubscription Allocation**	Not applicable
E.8	**Issue Price**	Not applicable
E.9	**Official currency or any other crypto- assets determining the issue price**	Not applicable
E.10	**Subscription fee**	Not applicable
E.11	**Offer Price Determination Method**	Not applicable
E.12	**Total Number of Offered/Traded Crypto-Assets**	990,000,000,000,000

E.13	**Targeted Holders**	ALL
E.14	**Holder restrictions**	The purchase of the Token from EU-regulated Exchanges will be available to all users of such Exchanges. Most trading and exchange services offered by Exchanges are open to retail holders, and may be subject to the compliance requirements of the respective Exchange. The Exchanges may impose restrictions on holders of Tokens on their respective Exchanges, in accordance with applicable laws and internal policies.
E.15	**Reimbursement Notice**	Not applicable
E.16	**Refund Mechanism**	Not applicable
E.17	**Refund Timeline**	Not applicable
E.18	**Offer Phases**	Not applicable
E.19	**Early Purchase Discount**	Not applicable
E.20	**Time-limited offer**	FALSE
E.21	**Subscription period beginning**	Not applicable
E.22	**Subscription period end**	Not applicable
E.23	**Safeguarding Arrangements for Offered Funds/Crypto-Assets**	Not applicable
E.24	**Payment Methods for Crypto-Asset Purchase**	Not applicable
E.25	**Value Transfer Methods for Reimbursement**	Not applicable
E.26	**Right of Withdrawal**	Not applicable
E.27	**Transfer of Purchased Crypto-Assets**	Not applicable
E.28	**Transfer Time Schedule**	Not applicable
E.29	**Purchaser's Technical Requirements**	Technical requirements will be specified by the exchange and may include the following: 1. A compatible digital wallet or account on supported exchanges; 2. Internet access; 3. A device (computer or mobile) to manage a digital wallet/private key and/or account on an exchange to carry out transactions
E.30	**Crypto-asset service provider (CASP) name**	Not applicable
E.31	**CASP identifier**	Not applicable
E.32	**Placement form**	NTAV

E.33	**Trading Platforms name**	• OKX; • Kraken;
E.34	**Trading Platforms Market Identifier Code (MIC)**	Not applicable
E.35	**Trading Platforms Access**	The Exchanges are accessible via their respective websites.
E.36	**Involved costs**	The use of services offered by Exchanges may involve costs, including transaction fees, withdrawal fees, and other charges. These costs are determined and set by the respective Exchanges and are not controlled, influenced, or governed by the Person Seeking Admission to Trading. Consequently, any changes to fee structures or the introduction of new costs are solely at the discretion of these platforms.
E.37	**Offer Expenses**	Not applicable
E.38	**Conflicts of Interest**	No known conflicts of interest.
E.39	**Applicable law**	Not applicable
E.40	**Competent court**	Not applicable
Part F - Information about the crypto-assets		
F.1	**Crypto-Asset Type**	Crypto-asset other than an asset-referenced token or e-money token
F.2	**Crypto-Asset Functionality**	According to the article 3(1)(5) of MiCA, a crypto-asset is a digital representation of a value or of a right that is able to be transferred and stored electronically using distributed ledger technology or similar technology. As reminded by the European Banking Authority ("***EBA***"), the term 'right' should be interpreted broadly in accordance with recital (2) of MiCA. The Token qualifies as a crypto-asset within the meaning of MiCA, as it a digital representation of the rights outlined in Section G.1 below. The Token can be transferred and stored using the distributed ledger technology ("***DLT***"). The Token facilitates Token holders' interaction with the Network. The Token gives its holders the following rights (and has the following features): • **Staking**: To become a validator, users must stake at least 1 trillion Tokens in the staking contracts deployed on Tron and run the proper software. Meanwhile, Token holders can stake their Tokens with Network validators to contribute to the Network's consensus mechanism, with a minimum delegation amount of 1 Token.

		• **Rewards**: Validators and delegators are compensated with the Token for their participation in securing the Network. 10% of network rewards are allocated to validators who submit checkpoints, while the remaining 90% is distributed among all delegators and validators according to their share of total staked assets. Validators have the option to charge a commission on the rewards earned by delegators.
F.3	**Planned Application of Functionalities**	Each of the functionalities mentioned in F.2 is already available.
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 white paper**	OTHR
F.5	**The type of submission**	NEWT
F.6	**Crypto-Asset Characteristics**	The Token is the utility and governance token of the Network, an L2 scaling solution that scales and connects different blockchains. The Token was initially launched as a TRC-20 token on Tron. Once the Network was launched in December 2021, the Token underwent a redenomination process and was launched on the Network to serve as its native token. Within Tron, the Token covers staking and rewards purposes. In this context, Token holders can stake their tokens with the Network validators to contribute to the Network's consensus mechanism. Delegators are rewarded with the Token based on their staked amount. Validators must stake at least 1 trillion tokens to participate in the Network's consensus mechanism by validating transactions and creating new blocks. Validators are compensated with the Token in exchange for their work. Within the Network, the Token serves to pay for transaction fees and governance purposes. Users who interact with the Network by deploying smart contracts or executing transactions must pay gas fees with the Token. The Token also serves as the Network governance token. The Network governance is in the hands of its validators, who participate by voting on proposals. Each validator has equal voting weight regardless of their staked amount. The Token is also used to compensate host nodes of the BTFS for the storage services they provide. The BTFS is a decentralised storage protocol developed within the Network's ecosystem that tackles storage limitations of traditional

		blockchains with a cost-effective and scalable solution for data storage and sharing through a peer-to-peer network. Any modifications to the Token's characteristics, rights, or obligations are implemented through protocol updates. These upgrades are approved or rejected by governance decisions made by the Network's validators. Validators vote on proposals related to Network parameter adjustments, protocol upgrades, and operational decisions such as changes to the fee structure and validators' slot allocations, which are then implemented as protocol upgrades. Changes to the protocol and Token mechanics are to be communicated through the Network's official channels and its documentation.
F.7	**Commercial name or trading name**	BTT
F.8	**Website of the issuer**	https://bt.io/
F.9	**Starting date of offer to the public or admission to trading**	2025/11/17
F.10	**Publication date**	2025/11/15
F.11	**Any other services provided by the issuer**	Please refer to Section A.13.
F.12	**Identifier of operator of the trading platform**	Not applicable
F.13	**Language or languages of the white paper**	English
F.14	**Digital Token Identifier Code used to uniquely identify the crypto-asset or each of the several crypto assets to which the white paper relates, where available**	BTT
F.15	**Functionally Fungible Group Digital Token Identifier, where available**	Not applicable
F.16	**Voluntary data flag**	FALSE
F.17	**Personal data flag**	TRUE
F.18	**LEI eligibility**	TRUE
F.19	**Home Member State**	Malta

F.20	**Host Member States**	The admission to trading of the Token is passported in the following countries: • Austria • Belgium • Bulgaria • Croatia • Cyprus • Czech • Germany • Denmark • Estonia • Spain • Finland • France • Greece • Hungary • Iceland • Ireland • Italy • Latvia • Liechtenstein • Lithuania • Luxembourg • Netherlands • Norway • Poland • Portugal • Romania • Slovakia • Slovenia • Sweden
Part G - Information on the rights and obligations attached to the crypto-assets		
G.1	**Purchaser Rights and Obligations**	The Token gives its holders the following rights (and has the following features): • **Staking**: Token holders can become a validator by staking at least 1 trillion Tokens and running the validator's software. Meanwhile, Token holders can be delegators by staking at least one Token with Network validators. • **Rewards**: Validators and delegators are compensated with the Token for their participation in securing the Network.

G.2	**Exercise of Rights and obligations**	The rights outlined in Section G.1 may be exercised through the following actions: • **Staking**: To become a validator, Token holders must stake at least 1 trillion Tokens and run the validator's software. Meanwhile, to become delegators, Token holders must stake at least one Token with Network validators. • **Rewards**: To be rewarded with the Token, Token holders must become validators or delegators.
G.3	**Conditions for modifications of rights and obligations**	Any modifications to the Token's characteristics, rights, or obligations are implemented through protocol updates. These upgrades are approved or rejected by governance decisions made by the Network's validators. Validators vote on proposals related to Network parameter adjustments, protocol upgrades, and operational decisions such as changes to the fee structure and validators' slot allocations, which are then implemented as protocol upgrades. Changes to the protocol and Token mechanics are to be communicated through the Network's official channels and its documentation.
G.4	**Future Public Offers**	Not applicable
G.5	**Issuer Retained Crypto-Assets**	Not applicable
G.6	**Utility Token Classification**	FALSE
G.7	**Key Features of Goods/Services of Utility Tokens**	Not applicable
G.8	**Utility Tokens Redemption**	Not applicable
G.9	**Non-Trading request**	TRUE
G.10	**Crypto-Assets purchase or sale modalities**	Not applicable
G.11	**Crypto-Assets Transfer Restrictions**	The Exchanges may impose restrictions on holders of Tokens on their respective Exchanges, in accordance with applicable laws and internal policies. Token holders who acquire the Token through 'private sales' are subject to restrictions as per the terms of sale.
G.12	**Supply Adjustment Protocols**	FALSE
G.13	**Supply Adjustment Mechanisms**	The Network periodically burns unclaimed rewards and a share of transaction fees to help regulate the Token's supply.

		However, the burning mechanism is not directly correlated with changes in the Token demand.
G.14	**Token Value Protection Schemes**	FALSE
G.15	**Token Value Protection Schemes Description**	Not applicable
G.16	**Compensation Schemes**	FALSE
G.17	**Compensation Schemes Description**	Not applicable
G.18	**Applicable law**	Subject to mandatory applicable law, any and all disputes or claims arising out of, or in connection with, this whitepaper and/ or the Token, including the validity, invalidity, breach or termination thereof, shall be governed by, construed and enforced exclusively in accordance with the laws of the British Virgin Islands.
G.19	**Competent court**	Subject to mandatory applicable law, any and all disputes or claims arising out of, or in connection with, this whitepaper and/ or the Token, including the validity, invalidity, breach or termination thereof, shall be subject to the exclusive jurisdiction of the courts in the British Virgin Islands.
Part H – Information on the underlying technology		
H.1	**Distributed ledger technology**	The Token has been launched on Tron.
H.2	**Protocols and technical standards**	The Token has been launched on Tron as a TRC-20 token, Tron's standard for fungible tokens.
H.3	**Technology Used**	The Token was launched as a TRC-20 token on Tron. Therefore, users can manage the Token through their own non-custodial wallet software provided by third parties or by directly interacting with the token's smart contract through a third-party API.
H.4	**Consensus Mechanism**	The Token was launched on Tron, which relies on its own implementation of a dPoS consensus mechanism. To participate in Tron's consensus mechanism, users must become Super Representative candidates by depositing 9,999 TRX, which are non-refundable, and running a full node. Candidates are entitled to participate in the Super Representatives elections, which take place every 6 hours. The 27 candidates with the most votes from TRX stakers become Super Representatives and are in charge of validating Tron's transactions and creating new blocks.
H.5	**Incentive Mechanisms and Applicable Fees**	In exchange for validating transactions and creating new blocks, Super Representatives are compensated with TRX, emitted as

		block rewards. Block rewards consist of 8 TRX per block, which are given to the Super Representative who creates the block. Additionally, Super Representatives who validate Tron's transactions and create its blocks are entitled to receive voting rewards, in the form of TRX, and emitted on a per-block basis. These rewards consist of 128 TRX per block, which are distributed among all Super Representatives and Super Representative partners based on the number of votes they received. Super Representatives can set their own commission rate from 0% to 100%, which determines how much of these rewards that correspond to the voter they will retain. Every Tron transaction incurs the payment of transaction fees, which are determined in the following manner: • **Bandwidth transactions:** Simple transactions like TRX transfers are paid with Bandwidth. Each user account receives 600 Bandwidth daily for free. To increase their amount of Bandwidth, users must stake TRX. When users do not hold enough Bandwidth, they must pay for these types of transactions with TRX. • **Energy transactions:** Smart contract interactions are paid with Energy and Bandwidth. Energy can only be obtained by staking TRX. If users do not hold enough Energy, this type of transaction will be paid with TRX. The TRXs used to pay for transaction fees are immediately burned. • **Fixed fees:** Tron has some transactions which are taxed with fixed fees to be paid with TRX. For instance, to become a Super Representative candidate costs a fixed fee of 9,999 TRX, 1,024 TRX to create a TRC-10 token, 1 TRX to activate a new account, and 100 TRX to update accounts' permissions.
H.6	**Use of Distributed Ledger Technology**	FALSE
H.7	**DLT Functionality Description**	Not applicable
H.8	**Audit**	TRUE
H.9	**Audit outcome**	The results of the audit conducted on Tron can be found in the following link: https://skynet.certik.com/projects/tron

Part I – Information on risks		
I.1	**Offer-Related Risks**	The Person Seeking Admission to Trading neither operates, controls, oversees, nor manages the functioning of the Exchanges where the Token will be admitted to trading. Additionally, the Token's underlying protocol may evolve due to ongoing technical, regulatory, and industry developments. Unforeseen risks may arise, and new challenges or opportunities may necessitate changes in the Network's strategies, goals, and structure. The risks outlined below highlight regulatory uncertainty, liquidity limitations, governance risks, network centralisation concerns, security vulnerabilities, and potential adjustments to fees or token supply that could impact the offer and trading of the Token. • **Regulatory Compliance Risks**: Although the Token is designed to comply with existing regulations (such as MiCA), evolving regulatory landscapes could impact its classification, trading status, or market/ community acceptance. Changes in regulatory requirements may necessitate modifications to the Network's operation, structure, or governance. Token holders must ensure compliance with local laws, as regulatory treatment of crypto-assets varies across jurisdictions. • **Market Volatility**: The Token is subject to extreme price fluctuations, influenced by market speculation, investor sentiment, and broader industry trends. External factors, such as regulatory announcements or technological developments, may further contribute to volatility, potentially leading to financial losses for holders. • **Liquidity Risks**: The ability to buy, sell or otherwise transact Tokens depends on activity on decentralised exchanges ("***DEXs***") and, if applicable, centralised exchanges ("***CEXs***"). Limited liquidity may result in difficulties executing large trades without significant price impact, increasing the risk of loss. • **Risk of Trading Platforms**: When Token holders trade on Exchanges, the Person Seeking Admission to Trading does not act as a contractual party to these transactions. All legal relationships regarding these trading platforms are subject to their respective terms and conditions, with no responsibility assumed by the Person Seeking Admission to Trading for their operations, services, or outcomes. • **Risk of Delisting**: There is no guarantee that the Token will remain listed on any exchange. Delisting could significantly

		hinder the ability to trade Tokens, reducing liquidity and market value. • **Risk of Bankruptcy**: The Exchanges or trading platforms where the Token is listed may become insolvent or cease operations, potentially resulting in a loss of access to funds or Tokens. • **Blockchain and Smart Contract Dependency**: The Token relies entirely on its blockchain infrastructure. Any network downtime, congestion, security vulnerabilities, or smart contract failures could negatively impact its functionality, accessibility, or security. Additionally, the network may, at some point, operate under a centralised or permissioned model, where specific providers or node operators manage the network. This structure presents centralisation risks, including the potential for censorship or data monetisation. • **Operational Risks**: Risks associated with the Token issuer/offeror's internal processes, personnel, and technologies may impact the ability to manage the Token's operations effectively. Failures in operational integrity could lead to disruptions, financial losses, or reputational damage. • **Financial Risks**: The Token issuer/offeror may face financial risks, including liquidity shortages, credit risks, or market fluctuations, which could affect its ability to continue operations, meet obligations, or sustain the stability and value of the Token. • **Legal Risks**: Uncertainties in legal frameworks, regulatory changes, potential lawsuits, or adverse legal rulings could pose significant risks, affecting the legality, usability, or value of the Token. • **Fraud and Mismanagement Risks**: The risk of fraudulent activity or mismanagement within the Token issuer/offeror's operations may impact the credibility of the project and the usability or value of the Token. • **Reputational Risks**: Negative publicity – whether due to operational failures, security breaches, or associations with illicit activities – could damage the Token issuer/offeror's reputation and, by extension, impact the value and acceptance of the Token. • **Technology Management Risks**: Inadequate management of technological updates or failure to keep pace with advancements may result in security vulnerabilities, inefficiencies, or obsolescence of the Token and its supporting infrastructure.

		• **Dependency on Key Individuals**: The success of the Token and its ecosystem may be highly dependent on key individuals. Loss or changes in project leadership could lead to operational disruptions, a loss of trust, or potential project failure. • **Conflicts of Interest**: Misalignment of interests between the Token issuer/offeror and Token holders may lead to governance decisions that are not in the best interests of the community, potentially affecting the value of the Token or damaging the credibility of the project. • **Counterparty Risks**: The Token issuer/offeror's reliance on external partners, service providers, and collaborators introduces risks related to non-fulfilment of obligations, which may affect the Token's operations, liquidity, or overall ecosystem stability. • **Industry Competition Risks**: The Token issuer/offeror faces competition from other projects, including larger and well-funded ventures that may attract more users and liquidity, potentially diminishing the viability of the Token. • **Investor Vesting Risks**: While Tokens allocated to the team and other stakeholders may be subject to a vesting schedule to prevent "rug pulls" and conflicts of interest, the unlocking of Tokens over time could affect supply and demand trends and liquidity. • **Speculative Nature of the Token**: Other than as stated herein with respect to the rights, functions, governance, staking, and fee-payment, the Token has no inherent utility beyond market sentiment and community-driven interest. Its value is highly speculative and subject to fluctuations based on external perceptions. • **Unanticipated Risks**: There may be additional risks that cannot be foreseen. Some risks may materialise as unexpected variations or combinations of the factors discussed in this section.
I.2	**Issuer-Related Risks**	• **Financial risk**. The issuer may be exposed to various financial risks, including liquidity, credit, interest-rate, and market risks, that could impair its ability to meet its obligations, fund operations, or manage cash flow. Unexpected market volatility or adverse economic conditions can further magnify these risks. • **Insolvency risk**. If the issuer's revenues fall short of liabilities or if operational challenges arise, the issuer could become insolvent and unable to meet its financial obligations. Insolvency could result in the suspension of

		services, delays in payments, or complete loss of invested funds. • **Funding risk**. The issuer may find it difficult to secure additional financing, whether through equity, debt, or other funding sources, when needed. Market conditions, investor sentiment, or regulatory barriers may limit access to capital, potentially hindering growth plans and jeopardizing the issuer's ability to sustain its operations. • **Legal risk**. The issuer could face legal claims, disputes, or regulatory investigations. These matters may be costly, time-consuming, and distracting, and can result in fines, penalties, or adverse judgments that negatively affect the issuer's financial position and reputation. • **Regulatory and legal changes**. Amendments to applicable laws or regulations, including evolving interpretations of existing rules, may require the issuer to adjust its business model. In certain cases, regulatory changes could restrict or prohibit specific activities, limit services provided to customers, or necessitate additional licensing or reporting. • **Reputational risk**. Failure to maintain transparency and accuracy in public disclosures, engage with the community, or manage operational issues may damage the issuer's reputation. Loss of public confidence can lead to reduced demand for the issuer's products or tokens, difficulties in attracting investors, and long-term erosion of brand value. • **Key person risk**. The issuer's success may depend heavily on a small number of individuals with specialized expertise, relationships, or institutional knowledge. The departure or incapacity of key personnel could disrupt critical processes, delay execution of strategic initiatives, and require significant time and resources to fill.
I.3	**Crypto-Assets-related Risks**	• **Market Volatility Risks**: The Token's value is highly volatile and may fluctuate due to market speculation, investor sentiment, regulatory developments, and technological advancements. External factors, such as shifting trends in the crypto industry, changing demand for blockchain services, or macroeconomic conditions, could contribute to extreme price fluctuations, potentially leading to total depreciation. • **Speculative Nature**: No assurances of future value, performance, or rewards are made regarding the Token. Other than as stated herein with respect to the rights, functions, governance, staking, and fee-payment, the Token has no inherent or guaranteed utility beyond its role in the

		Network, and its valuation depends entirely on user adoption, demand, and community engagement. If adoption of the Network fails to grow as expected, the Token's value may be significantly impacted. • **Liquidity Risks**: The ability to trade the Token depends on the level of activity on DEXs and, where applicable, CEXs. Low trading volume may result in difficulties executing large transactions without significant price impact. Limited demand for the Token or the underlying protocol may further reduce liquidity, making it difficult to acquire, sell or otherwise transact with the Token. • **Adoption and Network Demand Risks**: The long-term success of the Token is dependent on widespread adoption of the Network. Adoption is influenced by various external factors, including user demand, competitive economic conditions, and organic community-driven expansion. The Person Seeking Admission to Trading has no control over the pace of adoption, and there is no guarantee that the Network will gain sufficient traction to sustain its economic model. If demand is too low, accessing the Network may be difficult, while an inadequate supply may lead to delays in accessing the Network. • **Blockchain Dependency Risks**: The Token operates exclusively on its underlying blockchain network. Any disruptions, such as network congestion, downtime, or security vulnerabilities, could impact the ability to transfer, store, or trade the Token. Changes to blockchain infrastructure, governance, or transaction fees may also influence the Token's usability and cost-effectiveness. • **Transaction Costs:** While blockchain fees are generally low, network congestion, high demand, or changes in blockchain fee structures may increase transaction costs, potentially reducing the economic viability of using the Token within the Network. • **<u>Security Risks</u>**: ○ ***Smart Contract Vulnerabilities***: Despite security audits and best practices, unforeseen vulnerabilities in smart contracts could lead to security breaches, impacting Token security or functionality. ○ ***Private Key Management***: Token holders are solely responsible for safeguarding their private keys and recovery phrases. Loss of wallet credentials will result in the permanent loss of Tokens, as blockchain transactions are irreversible.

		○ **Scam and Fraud Risks**: Token holders are exposed to risks associated with scams, phishing attacks, fake giveaways, impersonation of the Token issuer/offeror or its team, counterfeit Tokens, and fraudulent airdrops. Engaging with unverified third-party platforms or unofficial communications increases the risk of fraud. ○ **Community and Narrative Risks**: The Token's success is closely tied to community interest and the broader crypto narrative. Macroeconomic trends, emerging competitors, or declining community engagement may negatively impact the Token's perceived value and adoption. • **<u>Regulatory and Compliance Risks</u>**: ○ ***Evolving Legal Frameworks***: Regulations governing crypto-assets differ across jurisdictions and are subject to change. New legal requirements may impact the Token's classification, availability, or functionality. ○ ***Jurisdictional Restrictions***: Some jurisdictions may impose restrictions or prohibitions on the trading or use of the Token, limiting its accessibility for certain users. ○ ***Regulatory Harmonisation Risks***: A lack of global regulatory alignment may create uncertainty, with some authorities potentially classifying the Token as a security or financial instrument, leading to increased compliance costs and legal obligations. ○ ***Regulatory Enforcement Risks***: Government agencies may take enforcement actions against the Token issuer/offeror if the Token is deemed an unregistered security or if other financial laws are found to have been violated. Such actions could negatively impact the Token's availability, appeal, and value. • **Anti-Money Laundering ("*AML*") & Counter-Terrorism Financing ("*CTF*") Risks**: Crypto transactions may be scrutinised for potential links to illicit activities. Authorities may take action against wallets or platforms suspected of facilitating money laundering or terrorist financing, affecting the ability of Token holders to use or trade their assets. • **Taxation Risks**: The tax treatment of the Token varies by jurisdiction, and Token holders are solely responsible for understanding and complying with applicable tax laws. Any appreciation, conversion, or sale of the Token may trigger tax obligations that differ depending on the regulatory environment.

		• **Team Vesting and Token Release Risks**: Tokens allocated to the team and other stakeholders may be subject to a vesting and unlock schedule. When these Tokens are vested, unlocked, and released into circulation, they may affect demand trends and liquidity. • **Technological Obsolescence Risks**: The blockchain and crypto industries evolve rapidly. The emergence of new technologies, changes in market demand, or advancements in competing protocols could render the Token or its underlying blockchain infrastructure less competitive, reducing adoption and utility. • **Software Weakness Risks**: The Token's infrastructure relies on relatively new blockchain technologies, which may contain undiscovered bugs, vulnerabilities, or inefficiencies. There is no guarantee that the process of transacting, storing, or interacting with the Token will be uninterrupted or error-free. • **Unanticipated Risks**: Beyond the risks outlined above, additional unforeseen risks may emerge due to changes in regulatory, technological, or macroeconomic conditions, potentially affecting the Token's security, functionality, or value.

I.4	**Project Implementation-Related Risks**	The Person Seeking Admission to Trading neither operates, controls, oversees, nor manages the technology underlying the Network. While efforts are made to ensure security and stability, blockchain-based technologies are still evolving, and various risks exist. Additionally, the success and sustainability of the project rely on various external factors, including macroeconomic conditions, regulatory developments, and technological advancements.
		
		• **<u>Technical Development Risks</u>**:
		  ○ ***Smart Contract Issues***: Despite robust security measures, unforeseen vulnerabilities or bugs in the smart contracts could disrupt Token distribution, refunds, or vesting mechanisms.
		  ○ ***Blockchain Dependency***: The Token operates exclusively on its underlying blockchain. Any network congestion, downtime, or security breaches could impact the project's implementation and functionality.
		  ○ ***Risk of Security Weaknesses in Core Infrastructure***: The project relies on open-source software, which may be modified by third parties not directly affiliated with the Issuer. Weaknesses or bugs introduced into the core

		infrastructure could compromise security and lead to the loss of digital assets. Furthermore, malfunctions or inadequate maintenance of the Network may negatively impact the Token's usability. ○ ***Bugs in Core Blockchain Code***: Even with rigorous testing, unknown bugs may exist in the blockchain protocol, potentially leading to disruptions, incorrect transaction processing, or security vulnerabilities. • **Regulatory and Compliance Risks:** ○ ***Regulatory Actions in One or More Jurisdictions***: The Token and the Network could be impacted by regulatory inquiries or actions, which may restrict further development, implementation, or usage. ○ ***Evolving Laws and Regulations***: New and changing laws related to financial securities, consumer protection, data privacy, cybersecurity, and intellectual property could impact the project. Compliance with these laws may require significant resources and could impose additional operational constraints. ○ ***Governance Risk***: Decision-making mechanisms in blockchain governance may be inefficient, slow, or disproportionately influenced by specific stakeholders, leading to potential centralisation or unfavourable network changes. • **Operational Risks**: ○ ***Resource Allocation***: The project's success depends on the issuer of the Token and its core team allocating sufficient resources (both financial and non-financial) to ensure timely development and deployment. Poor resource management could lead to delays or failure to achieve key milestones. ○ ***Team Vesting Risks***: While the team's Tokens may be subject to a vesting and unlock schedule to align interests with the community, the eventual vesting and unlocking of these Tokens may impact market stability or long-term commitment from team members. • **Market Adoption Risks**: ○ ***Competitive Environment***: The crypto industry is highly competitive and trend-driven. There is a risk that the Token may fail to capture sufficient interest, limiting its adoption. ○ ***Community Engagement Risks***: The success of the Token depends heavily on community-driven sentiment and engagement. Failure to build or sustain an active

		community could hinder growth and long-term tradability
		• **<u>Timeline and Milestone Risks</u>**:
		  ○ ***Delayed Milestones***: Key deliverables such as Token distribution and liquidity access may face delays due to technical, operational, or funding challenges.
		  ○ ***CEX Listing Risks***: Listings on centralised exchanges depend on securing the necessary funding for listing fees and meeting platform-specific requirements. Delays or insufficient resources could postpone broader market/ community access.
		• **<u>Ecosystem Risks</u>**:
		  ○ ***Dependence on External Partners***: The project relies on partnerships with infrastructure providers, liquidity providers/ market makers, exchanges and other third-party service providers. Any failure or delay from these partners could disrupt implementation plans.
		  ○ ***Risk of Withdrawing Partners***: The Token holder understands that the feasibility of the project depends strongly on the collaboration of service providers and other key stakeholders. A loss of critical partnerships could impact project sustainability.
		• **<u>Technology and Software Risks</u>**:
		  ○ ***Risk of Software Weakness***: The Token holder acknowledges that blockchain and smart contract technologies are still evolving. There is no guarantee that Token usage will be uninterrupted or error-free. Vulnerabilities in the underlying blockchain, smart contracts, or supporting technologies could lead to the complete loss of Tokens or their functionality.
		  ○ ***Dependency on Underlying Technology***: The Network relies on blockchain infrastructure, hardware, and network connectivity, all of which may be subject to failures, outages, or vulnerabilities.
		  ○ ***Risk of Technological Disruption***: The emergence of new technology, such as quantum computing, could undermine the security of blockchain encryption and compromise the integrity of digital assets.
		• **<u>Network Security Risks</u>**:
		  ○ ***Network Attacks and Cybersecurity Threats***: Blockchain networks can be vulnerable to cyberattacks such as 51% attacks, Sybil attacks, or distributed denial-of-service ("***DDoS***") attacks. These threats could disrupt network operations and compromise security.

		○ ***Blockchain Network Attacks***: The network may be subject to validation attacks, including double-spend attacks, reorganisations, majority mining power attacks, "vampire" attacks and work race condition attacks. Successful attacks could compromise the proper execution of transactions and smart contracts. • **Privacy and Anonymity Risks**: ○ ***Public Ledger Transparency***: Blockchain transactions are recorded on a public ledger, which may expose transaction history and financial activity. Certain transactions could be linked to specific wallet addresses, making users vulnerable to fraud, phishing attacks, or targeted scams. • **Economic and Governance Risks**: ○ ***Consensus Failures or Forks***: Errors in the consensus mechanism could lead to forks, where multiple versions of the ledger coexist, or network halts, reducing trust in the network. ○ ***Economic Self-Sufficiency***: The long-term sustainability of the Token ecosystem depends on sufficient transaction volume to generate fees to support rewards for validators, which in turn maintain network security. A lack of adoption could lead to governance-driven changes to monetary policy, fee structures, or consensus mechanisms. ○ ***Incentive Model Risks***: Changes to block rewards, staking incentives, or governance models may be required to maintain network participation. Governance decisions could result in modifications that impact Token holders, including inflationary adjustments, transaction fees, or redistribution of rewards. • **Software Weakness Risks**: ○ ***Unforeseen Bugs and Security Vulnerabilities***: The Token and its supporting infrastructure rely on blockchain technologies that may still be evolving. There is no guarantee that Token transactions will be uninterrupted or error-free. Software vulnerabilities, weaknesses in smart contracts, or infrastructure issues may result in loss of assets, security breaches, or unexpected network failures. • **Unanticipated Risks**: ○ ***Unforeseen Regulatory, Technological, or Economic Challenges***: In addition to the risks identified, new

		threats may emerge due to changes in legal, technological, or economic conditions. Developments such as regulatory crackdowns, unforeseen Network vulnerabilities, or disruptive innovations could impact the usability, security, or value of the Token in ways not currently foreseeable.
I.5	**Technology-Related Risks**	The Person Seeking Admission to Trading neither operates, controls, oversees, nor manages the technology underlying the Network. While efforts are made to ensure security and stability, blockchain-based technologies are still evolving, and various risks exist. • **<u>Blockchain Dependency Risks</u>**: ○ ***Network Downtime and Congestion***: The Token relies entirely on its underlying blockchain network, which may experience outages, congestion, or downtime. Such events could disrupt Token transfers, trading, or other functionalities. ○ ***Scalability Challenges***: As transaction volume grows, the blockchain network may face scaling limitations. Increased congestion could lead to slower transaction processing times and higher fees, reducing efficiency and usability. ○ ***Settlement and Transaction Finality Risks***: Blockchain transactions are designed to be irreversible; however, under exceptional circumstances such as network forks or consensus failures, there remains a theoretical risk that transactions could be reversed, or multiple competing ledger versions could persist. Transactions sent to an incorrect address are not recoverable, leading to permanent loss of assets. • **<u>Smart Contract Risks</u>**: ○ ***Vulnerabilities***: While smart contracts are developed with security measures, undiscovered vulnerabilities or exploits may impact Token security, distribution, or access. Bugs in the contract code may lead to unintended loss of Tokens, unauthorised transactions, or exposure to external attacks. ○ ***Immutability Risks***: Once deployed, some smart contracts cannot be altered. Errors or security flaws in the code could result in operational failures without the possibility of corrections. ○ ***Security Exploits***: Bugs or vulnerabilities in smart contracts may expose the Token ecosystem to potential

		hacks, allowing attackers to manipulate transactions, drain liquidity, or disrupt contract execution.
		• **<u>Network Security Risks</u>**:
		  ○ ***Risk of Attacks and Forks***: The blockchain may be susceptible to consensus-related attacks, such as double-spend attacks, majority validation power takeovers, censorship attacks, or forks. These risks could affect Token transactions, balance integrity, and overall network security.
		  ○ ***Cybercrime and Theft Risks***: Despite security efforts, blockchain-based assets and services may be exposed to cyberattacks, including hacking, phishing, or malware threats. Compromised wallets, exchanges, or smart contracts could lead to asset theft, loss of funds, or disruptions in Token functionality.
		  ○ ***Data Corruption Risks***: The reliability of blockchain data could be compromised due to software bugs, human error, or deliberate tampering. Such incidents may affect transaction records, network integrity, and user confidence in the system.
		• **<u>Wallet and Storage Risks</u>**:
		  ○ ***Private Key Management***: Token holders are solely responsible for securing their private keys and recovery phrases. The loss of private keys results in irreversible loss of Tokens, as blockchain transactions are final and cannot be undone.
		  ○ ***Compatibility Issues***: The Token is supported only by blockchain-compatible wallets. Incompatibility with specific wallet software, network malfunctions, or wallet provider shutdowns may affect access to and usability of the Token.
		• **<u>Ecosystem Dependency Risks</u>**:
		  ○ ***DEX and CEX Integration Issues***: The Token's availability depends on integration with DEXs and CEXs. Technical failures, security breaches, or delisting from these platforms could limit liquidity, disrupt trading, and reduce Network accessibility.
		  ○ ***Reliance on Third-Party Services***: Many blockchain services, including wallets, bridges, and oracles, depend on third-party providers. Failures, security breaches, or regulatory actions against these services could negatively affect the functionality of the Token.
		  ○ ***Centralisation Concerns***: Although blockchain networks are designed to be decentralised, a small number of validators or node operators could introduce

		centralisation risks. This may lead to potential censorship, control over transactions, or increased vulnerability to governance attacks.
		• **<u>Software and Protocol Risks</u>**:
		  ○ ***Bugs in Core Blockchain Code***: Despite rigorous testing, undiscovered bugs in the core blockchain protocol could lead to network failures, incorrect transaction processing, or security vulnerabilities. A failure to address such issues promptly could result in loss of user confidence and network instability.
		  ○ ***Risk of Technological Disruption***: Emerging technologies, such as quantum computing, could potentially compromise blockchain encryption, making networks vulnerable to attacks that could compromise data integrity or enable unauthorised asset transfers.
		  ○ ***Dependency on Underlying Technology***: The stability of the Token ecosystem relies on underlying technical infrastructures, including internet connectivity, computing hardware, and cryptographic algorithms. Disruptions in these foundational technologies may impact network security and operational efficiency.
		• **<u>Privacy and Anonymity Risks</u>**:
		  ○ ***Public Ledger Transparency***: Blockchain transactions are recorded on a publicly accessible ledger, which may expose sensitive transaction data. While addresses do not directly reveal identities, sophisticated data analysis could potentially link certain transactions to specific individuals or entities.
		  ○ ***Exposure to Fraud and Targeted Attacks***: Increased transparency may lead to risks such as phishing, fraud, or unauthorised tracking of user activity by malicious actors. Individuals with significant Token holdings may be targeted for scams or social engineering attacks.
		• **<u>Economic and Network Viability Risks</u>**:
		  ○ ***Economic Self-Sufficiency***: The long-term sustainability of the Token ecosystem depends on maintaining sufficient transaction volume to generate rewards for incentivising validators to ensure network security. If network adoption remains low, there is a risk of reduced validator participation, increased transaction costs, or a need for governance-driven changes to monetary policy, fee structures, or consensus mechanisms.
		  ○ ***Incentive Model Risks***: Changes to block rewards, staking incentives, or governance models may be

		required to ensure ongoing network security and sustainability. Governance proposals may introduce modifications that impact Token holders, including inflation adjustments, transaction fees, or redistribution of rewards. • **<u>Software Weakness Risks</u>**: ○ ***Unforeseen Bugs and Security Vulnerabilities***: The Token and its supporting infrastructure rely on blockchain technologies that may still be evolving. There is no guarantee that Token transactions will be uninterrupted or error-free. Software vulnerabilities, weaknesses in smart contracts, or infrastructure issues may result in loss of assets, security breaches, or unexpected network failures. • **<u>Unanticipated Risks</u>**: ○ ***Unforeseen Regulatory, Technological, or Economic Challenges***: In addition to the risks identified, new threats may emerge due to changes in legal, technological, or economic conditions. Developments such as regulatory crackdowns, unforeseen Network vulnerabilities, or disruptive innovations could impact the usability, security, or value of the Token in ways not currently foreseeable.
I.6	**Mitigation measures**	Not applicable
Part J – Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts		
J.01	**Name**	BitTorrent Tech Limited
J.02	**Relevant legal entity identifier**	Not available
J.03	**Name of the crypto-asset**	BTT
J.04	**Consensus Mechanism**	The Token was launched on Tron, which relies on its own implementation of a dPoS consensus mechanism. To participate in Tron's consensus mechanism, users must become Super Representative candidates by depositing 9,999 TRX, which are non-refundable, and running a full node. Candidates are entitled to participate in the Super Representatives elections, which take place every 6 hours. The 27 candidates with the most votes from TRX stakers become Super Representatives and are in charge of validating Tron's transactions and creating new blocks.
J.05	**Incentive Mechanisms and Applicable Fees**	In exchange for validating transactions and creating new blocks, Super Representatives are compensated with TRX, emitted as

		block rewards. Block rewards consist of 8 TRX per block, which are given to the Super Representative who creates the block. Additionally, Super Representatives who validate Tron's transactions and create its blocks are entitled to receive voting rewards, in the form of TRX, and emitted on a per-block basis. These rewards consist of 128 TRX per block, which are distributed among all Super Representatives and Super Representative partners based on the number of votes they received. Super Representatives can set their own commission rate from 0% to 100%, which determines how much of these rewards that correspond to the voter they will retain. Every Tron transaction incurs the payment of transaction fees, which are determined in the following manner: • **Bandwidth transactions:** Simple transactions like TRX transfers are paid with Bandwidth. Each user account receives 600 Bandwidth daily for free. To increase their amount of Bandwidth, users must stake TRX. When users do not hold enough Bandwidth, they must pay for these types of transactions with TRX. • **Energy transactions:** Smart contract interactions are paid with Energy and Bandwidth. Energy can only be obtained by staking TRX. If users do not hold enough Energy, this type of transaction will be paid with TRX. The TRXs used to pay for transaction fees are immediately burned. • **Fixed fees:** Tron has some transactions which are taxed with fixed fees to be paid with TRX. For instance, to become a Super Representative candidate costs a fixed fee of 9,999 TRX, 1,024 TRX to create a TRC-10 token, 1 TRX to activate a new account, and 100 TRX to update accounts' permissions.
J.06	**Beginning of the Period to which the Disclosed Information Relates**	2022/06/30
J.07	**End of the Period to which the Disclosed Information Relates**	2022/07/01
Mandatory key indicator on energy consumption		
J.08	**Energy Consumption**	162,867.85 kWh

Sources and methodologies		
J.09	**Energy Consumption Sources and Methodologies**	• The methodology builds upon four steps to generate data on the electricity consumption and carbon footprint of the TRON POS system. CCRI develops metrics to enable a valid comparison between previously analysed PoS systems. • The methodology involves analysing the TRON PoS network, estimating electricity usage of a single node, estimating electricity consumption of the complete network, and analszing transaction and block information. • Electricity consumption is measured using Mystrom WiFi Switches.