

POL TOKEN WHITE PAPER

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INTRODUCTORY STATEMENTS

Nº	FIELD	CONTENT
01 Date of Notification		
01	Date of Notification	This crypto-asset white paper ("White Paper") was notified to the Central Bank of Ireland on 2025-12-08.
02 Statement in Accordance with Article 6 (3) of Regulation (EU) 2023/1114		
02	Statement in Accordance with Article 6 (3) of Regulation (EU) 2023/1114	This 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 Statement in Accordance with Article 6 (6) of Regulation (EU) 2023/1114		
03	Statement in Accordance with Article 6 (6) of Regulation (EU) 2023/1114	This 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 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		
04	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 ("Token") 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		
05	Statement in Accordance with Article 6(5), point (d) of Regulation (EU) 2023/1114	The Token may not be exchangeable against the good or service described in this White Paper, especially in the case of a failure or discontinuation of the crypto-asset project.

06 Statement in Accordance with Article 6(5), points (e) and (f) of Regulation (EU) 2023/1114

06	Statement in Accordance with Article 6(5), points (e) and (f) of Regulation (EU) 2023/1114	<p>The Token is not covered by the investor compensation schemes under Directive 97/9/EC of the European Parliament and of the Council.</p> <p>The Token is not covered by the deposit guarantee schemes under Directive 2014/49/EU of the European Parliament and of the Council.</p>
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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 White Paper. The prospective holder should base any decision to purchase this Token on the content of the White Paper as a whole and not on the summary alone. The admission to trading of this Token do not constitute an offer or solicitation to purchase financial instruments, or an admission to trading of financial instruments and any such offer, solicitation or admission can be made only by means of a prospectus or other offer documents pursuant to the applicable national law. This 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	Key Information about the Characteristics of the Crypto-Asset	<p>The Token is the gas and staking token of the Polygon PoS Network (“Network”).</p> <p>The Token is natively issued on Ethereum pursuant to the ERC-20 standard. Bridging of the Token is facilitated through canonical bridging mechanisms that lock the Token on Ethereum and mint a corresponding representation on the Network.</p> <p>The Token is an upgrade of MATIC, a token that served as the native token of the Network until September 2024, when MATIC became convertible 1:1 to POL on the Network and became the native gas and staking token for the Network.</p> <p>The Token was launched with an initial supply of 10 billion units and is subject to an annual compounding emission mechanism (“Emission Rate”) managed through the decentralized governance of validators (see <i>below</i>). Emissions are administered by the EmissionManager contract, having exclusive authority over new Token mints, as constrained by a hardcoded mintPerSecondCap. Newly minted Tokens are allocated to serve as Validator Rewards (see <i>below</i>) and for community growth. As of the date of this White Paper, the Emission Rate is set at 2% per annum, resulting in a total supply of approximately 10.5 billion units.</p> <p>The Token grants access to the following functionalities in relation to the Network:</p> <ul style="list-style-type: none">▪ Gas Functionality: The Token serves to pay for the gas on the Network;

		<ul style="list-style-type: none"> ▪ Validator Staking Functionality: Tokens can be staked on the Network to act as a validator, thereby contributing to the Network consensus mechanism, and verifying transactions in exchange for rewards (“Validator Rewards”). Network validators are also responsible for voting on proposed upgrades and modifications to the Network protocol, with the implementation of such changes being contingent upon validator approval. <p><i>The validators may thus adopt Network upgrades that modify or extend the functionalities associated with the Token. Any such upgrades are outside the control and responsibility of the Company and the Issuer.</i></p> ▪ Delegated Staking Functionality: Token holders may delegate their Tokens to other participants who act as validators, rather than directly joining the Network in those roles themselves, while still benefiting from the Validator Rewards generated by the participants to whom they have delegated. <p>All the above functionalities are purely technical and do not confer any rights against any entity nor impose any obligations on Token holders in a legal sense.</p> <p>All the above functionalities are made available on an “as is” basis.</p> <p>The Token qualifies as a crypto-asset other than e-money token and asset-reference token, and specifically a utility token, under Regulation (EU) 2023/1114 of the European Parliament and of the Council of 31 May 2023 on markets in crypto-assets (“MiCAR”).</p>
09	Key Information about the Quality and Quantity of the Goods or Services to which the Utility Token give Access	The quantity and quality of all functionalities is determined respectively, by the circulating supply of Tokens available for effective use and the overall state of the Network. As the Network evolves and engagement therewith too, both factors will be shaped by effective Network participants at any given time and overall Network development, making them currently unquantifiable.

	Restrictions on Transferability.	The Tokens to be admitted to trading are freely transferable.
10	Key information about the offer to the public or admission to trading	<p>Polygon Labs Services (Switzerland) AG ("Company") acts as the person seeking admission to trading and seeks admission of the Token on multiple Trading Platforms, operating within the European Union ("EU") or the European Economic Area ("EEA") ("Trading Platforms").</p> <p>The Token has also been trading on the following Trading Platforms in the EU since September 2024 (each of which had previously admitted MATIC to trading): Coinbase, Crypto.com, and Kraken.</p> <p>Additional listings are sought but were not yet confirmed.</p> <p>The up-to-date list of confirmed and available Trading Platforms will be maintained on the Company's website.</p> <p>In offering and seeking admission to trading, the Company complies with its obligations under article 5 of Regulation (EU) 2023/1114.</p>

PART I – INFORMATION ABOUT THE RISKS

I.1 Admission to Trading-Related Risks

I.1	Offering and Admission to Trading-Related Risks	<p><u>For the Admission to Trading</u></p> <ul style="list-style-type: none">▪ No Listing Risk: The present white paper is drafted and notified by the Company in accordance with its obligations under Article 5 of MiCAR, in its capacity as a person seeking the admission of the Token to trading. The Company its affiliates, directors, and officers shall not be held liable for any damages, losses, costs, fines, penalties, or expenses of any kind - whether or not reasonably foreseeable by the Company or the Token holder - that the Token holder may suffer, sustain, or incur in connection with, or as a result of, the Token not being listed on a Trading Platform.▪ General Contractual and Counterparty Risk: The Company neither operates nor controls, oversees, or manages the functioning of crypto-asset services providers as defined under MiCAR (“CASP”) operating within the EU /EEA and Trading Platforms where the Token will be admitted for trading or listed. When Token holders buy or sell the Token on Trading Platforms, the Company is not a contractual party to these transactions. As a result,<ul style="list-style-type: none">▪ any legal relationship between Token holders and the Exchange is governed solely by the terms and conditions set by each Exchange at its discretion.▪ The Company assumes no responsibility or liability for the operations, services, security, performance, or any outcomes—whether financial or technical—arising from transactions conducted on these Trading Platforms.▪ The Company provides no assurances regarding any Exchange itself and assumes no responsibility or liability for any regulatory, compliance, operational, financial, technical, or reputational failures that may adversely affect its activities. This includes, but is not limited to, circumstances where such failures result in disruptions, restrictions on trading, or the Exchange halting or ceasing its operations entirely, due to sanctions, bankruptcy or alike. The foregoing may result in substantial or even total losses for the Token holder.▪ Pausing and Delisting Risk: The Company cannot guarantee that the Token will remain listed or tradeable on any Trading Platforms. Delisting (or the temporary pausing of such listing) could significantly hinder the ability of Token holders to buy, sell, or otherwise transact in Tokens. In
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	<p>the event of delisting, Token holders may face challenges in finding alternative markets or counterparties willing to trade Tokens, which could adversely impact the Token's liquidity and market value. Delisting could also negatively impact the price of the Token, due to modified demand for the Token and/or reputational impact.</p> <p>Trading Risk: The Company does not control the secondary markets. There can be no assurance as to the secondary market (if any) in the Tokens, and specifically:</p> <ul style="list-style-type: none"> ▪ it cannot guarantee the depth, stability, or sustainability of any secondary market for Tokens. Limited market depth or trading activity may result in reduced liquidity, increased price volatility, and challenges in buying or selling Tokens at desired prices; and ▪ it cannot guarantee the healthy and consistent availability of buying or selling opportunities for Tokens or the integrity of their market price. Trading activity may be affected by manipulative practices such as wash trading, front-running, and similar schemes. While Trading Platforms are subject to varying regulatory frameworks that may or may not prohibit such practices and impose oversight to detect and deter them, the Company assumes no responsibility or liability for their effective prevention or enforcement. <p>Unsolicited Admission to Trading Risk: Third parties can elect to support Tokens on their Trading Platforms without any request nor authorization or approval by the Company or anyone else. Token listing, or any further integration, by any third-party does not imply any endorsement by the Company that such third-party services are valid, legal, stable or otherwise appropriate.</p> <p>Operational and Technical Risk: Trading Platforms operate interfaces that allow users to trade crypto-assets for fiat currencies, such as U.S. Dollars and Euros, or other crypto-assets. The reliance on the Exchange's internal system for asset storage and transfer adds an additional layer of counterparty risk, as users are exposed to potential operational, technical, or human errors during these processes. As a result, the Company assumes no responsibility or liability for any losses arising from these risks.</p> <ul style="list-style-type: none"> ▪ Trades on these Trading Platforms are executed based on a centralized matching algorithm and are often recorded off-chain, meaning they are not directly related to transparent on-chain transfers of crypto-assets, and could dissimulate detrimental trade matching or rogue practices. The traded assets are recorded solely on the Exchange's internal ledger, with each internal ledger entry corresponding to an offsetting trade involving either government currency or another crypto asset.
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		<ul style="list-style-type: none"> ▪ Additionally, funds deposited by users for trading may be co-mingled by the Trading Platforms, rather than stored in unique wallet addresses for each user. This practice results in the centralization of a large volume of assets in a single location, which in turn increases the potential risk of damage or theft, particularly in the event of a hack or security breach. ▪ Furthermore, users who wish to trade or withdraw their Tokens must deposit them into the Exchange, increasing the risk of loss in the event of a failure of the deposit or withdrawal processes set up by the Exchange. <p>Unanticipated Risks: In addition to the risks outlined in this Section, unforeseen risks may arise. Additionally, new risks could emerge as unexpected variations or combinations of the risks discussed in these Sections I.1 to I.5.</p>
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I.2 Company and Issuer-Related Risks

I.2	Company and Issuer-Related Risks	<ul style="list-style-type: none"> ▪ Abandonment / Lack of Success Risk: This is the risk that the activities of the Company and Issuer must be partially or totally abandoned for several reasons including, but not limited to, lack of interest from the public, lack of funding, incapacitation of key developers and project members, force majeure (including pandemics and wars) or lack of commercial success or prospects. ▪ Legal and Regulatory Compliance Risk: Crypto assets and blockchain-based technologies are subject to evolving regulatory landscapes worldwide. Regulations vary across jurisdictions and may be subject to significant changes. This could lead to changes with respect to trading of the Token and increase the Company and Issuer's costs and/or obligations in admitting the Token for trading. Changes in laws or regulations may negatively impact the value, legality, or functionality of the Token. Non-compliance can result in investigations, enforcement actions, penalties, fines, sanctions, or the prohibition of the trading of the Token impacting its viability and market acceptance. The Company and Issuer could also be subject to private litigation. ▪ Reputational Risk: The Company and Issuer face the risk of negative publicity, whether due, without limitation, to operational failures, security breaches, or illicit activities, all of which can damage the Company/Issuer's reputation and, by extension, the value and acceptance of the Token.
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		<ul style="list-style-type: none"> ■ Key Individuals Risk: The success of a crypto project can be highly dependent on the expertise and leadership of key individuals. Loss or changes in the Company and Issuer's leadership could lead to disruptions, loss of trust, or project failure. ■ Internal Control Risk: Any failure by the Company and Issuer to develop or maintain effective internal controls or any difficulties encountered in the implementation of such controls, or their improvement could harm it, causing the issuer to have to report such failures. Such failures could lead to a loss of trust and further harm the business of the Company and Issuer, causing disruptions, financial losses, or reputational damage affecting the Token. Fraudulent activity or mismanagement by the Company and Issuer could directly impact the usability or value of the Token or damage the credibility of the Platform, Network and the Project at broad. ■ Unanticipated Risks: In addition to the risks outlined in this Section, unforeseen risks may arise. Additionally, new risks could emerge as unexpected variations or combinations of the risks discussed in these Sections I.1 to I.5.
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I.3 Crypto-Assets-Related Risks

I.3	Crypto-Assets-Related Risks	<ul style="list-style-type: none"> ■ Token Admission to Trading "As Is" Risk: The Tokens are admitted to trading on an "as is" and "as available" basis without warranties of any kind, and the Company and Issuer expressly disclaim all implied warranties that the Token, the software code of the programs, are free of viruses or other harmful components which may affect the Tokens. ■ Market Risk: Crypto assets, including Tokens, are highly volatile and can experience significant price swings in short periods, increasing the risk of sudden and substantial losses. Such valuation risk arises as the market value of a crypto asset may not always reflect its underlying utility or fundamentals and is subject to subjective assessment. Token holders are thus exposed to potential for losses due to the Token's <ul style="list-style-type: none"> ■ potential fluctuations in value, driven by various factors such as supply and demand dynamics, investor sentiment, and broader market trends, incl. changes in interest rates, general movements in local and international markets, technological advancements, regulatory changes, and media coverage. Notably, momentum pricing of crypto assets has previously resulted, and may continue to result, in speculation regarding future appreciation or depreciation in the value of such assets, further contributing to volatility and potentially inflating prices at any given time.
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		<ul style="list-style-type: none"> ▪ liquidity risk, where a lack of depth in secondary markets – if any – or limited trading volumes can hinder the ability to execute trades at favorable prices, which could lead to significant losses, especially in fast-moving market conditions. As a result, holders of Tokens may experience challenges in managing their holdings, with the value of the asset subject to unpredictable fluctuations and potential depreciation. ▪ solvency and collateral risk, if the Token is used to finance further activities, especially in leveraged positions or as collateral for loans. Significant fluctuations in the value of the Token could adversely affect the solvency of its holder, particularly if the Token is pledged as collateral. A drastic decline in its value may trigger margin calls or automatic liquidations, which could further depress the Token's price, creating a negative feedback loop. This volatility poses the risk of forced asset sales, potentially resulting in substantial losses for the holder and amplifying downward pressure on the market price of Tokens. ▪ Custodial Risk. The method chosen to store Tokens, like any crypto-asset, carries inherent risks related to the security and management of the storage solution. The chosen storage method, whether hot or cold wallets, or centralized custody, can significantly impact the safety, liquidity, and accessibility of Tokens, with direct consequences for the holder's ability to access, trade, or retain their assets. ▪ Scam Risk. This is the risk of loss resulting from a scam or fraud suffered by Token holders from other malicious actors. These scams include, but are not limited to, phishing on social networks or by email, fake giveaways, identity theft, creation of fake Tokens, offering fake Token airdrops, among others. ▪ Anti-Money Laundering/Counter-Terrorism Financing Risk: This is the risk that crypto-asset wallets holding Token or transactions in Token may be used for money laundering or terrorist financing purposes or identified to a person known to have committed such offenses. There is thus a risk that a public address holding Tokens could be flagged in relation to Anti-Money Laundering or Counter-Terrorism Financing efforts. In such cases, receiving Tokens could result in the holder's address being flagged by relevant authorities, Trading Platforms, or other service providers, which may lead to restrictions on transactions or the freezing of assets. Consequently, holders of Tokens may face legal or regulatory challenges if their address becomes associated with illicit activities, impacting their ability to freely access, trade, or transfer their Tokens.
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	<ul style="list-style-type: none"> ▪ Taxation Risk: The taxation regime that applies to the trading of Tokens by either individual holders or legal entities will depend on each Token holder's jurisdiction. The Company cannot guarantee that the holding of Tokens, the reception of the Token, conversions of fiat currency against Tokens, or conversions of other crypto assets against Tokens, will not incur tax consequences. It is the Token holder's sole responsibility to comply with all applicable tax laws, including, but not limited to, the reporting and payment of income tax, wealth tax or similar taxes arising in connection with the appreciation and depreciation of the Token. ▪ Market Abuse Risk: The market for crypto assets is rapidly evolving, spanning local, national, and international networks with an expanding range of assets and participants. Any market abuse, along with a potential loss of confidence among holders, could adversely impact the value and stability of Tokens, and by extension the trading conditions on the Trading Platforms. Notably, <ul style="list-style-type: none"> ▪ significant trading activity may take place on systems and networks with limited oversight and predictability. Sudden and rapid changes in the supply or demand of a crypto asset, particularly those with low market capitalization or low unit prices, can result in extreme price volatility. ▪ the inherent characteristics of crypto assets and their underlying infrastructure may be exploited by certain market participants to engage in abusive trading practices such as front-running, spoofing, pump-and-dump schemes, and fraud across different networks, systems, or jurisdictions. ▪ Legal and Regulatory Risk: There is a lack of regulatory harmonization and cohesion globally, which results in diverging regulatory frameworks and possible further regulatory evolutions in the future. These could negatively impact on the value, utility, and overall viability of Tokens and, in extreme cases, force the Company to cease operations. Notably, <ul style="list-style-type: none"> ▪ While Tokens do not create or confer any contractual or other obligations against any party, certain non-EU regulators may nevertheless classify them as securities, financial instruments, or payment instruments under their respective legal frameworks. Such classifications could impose specific regulatory constraints, leading to significant changes in how Tokens are structured, issued, purchased, or traded. ▪ Evolving regulations could substantially increase the Company's compliance costs and operational burdens related to facilitating transactions in Tokens.
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		<ul style="list-style-type: none"> ▪ New or restrictive regulations could result in the Token losing functionality, depreciating in value, or even becoming illegal or impossible to use, buy, or sell in certain jurisdictions. ▪ Regulators could take enforcement action against the Company if they determine that the Token constitutes a regulated instrument or that the Company's activities violate existing laws. Such actions could expose the Company, its affiliates, directors, and officers to legal and financial penalties, including civil and criminal liability. <p>Unanticipated Risks: In addition to the risks outlined in this Section, unforeseen risks may arise. Additionally, new risks could emerge such as unexpected variations or combinations of the risks discussed in these Sections I.1 to I.5.</p>
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I.4 Project Implementation-Related Risks

I.4	Project Implementation-Related Risks	<ul style="list-style-type: none"> ▪ Network “As Is” Risk: The Network and any future components were deployed on an “as is” and “as available” basis without warranties of any kind, and the Company expressly disclaims all implied warranties as to the Network and the Token including, without limitation, implied warranties of merchantability, fitness for a particular purpose, title and non- infringement. Therefore, the Company cannot and does not warrant that the Token, the programs, or the technology underlying the Tokens and Network (jointly, “Polygon Technology”) are reliable, current or error-free, free of viruses or other harmful components, meet the Token’s requirements, or that defects in the Polygon Technology will be corrected. Additionally, there is a risk that Network functionalities may be abandoned, that no new functionalities may be added. ▪ Decentralized Governance and Network Change Risk: The Network is subject to decentralized, on-chain validation and decision-making. This could result in material changes to the Network’s goals, priorities, or operating methods. While such evolution can promote innovation and strengthen adaptability, it also presents certain risks, such as alterations in the value proposition over time. ▪ Novel Ecosystem Risk: The Token holder understands and acknowledges that the Polygon ecosystem, as evolving around the Network, is built on emerging and rapidly evolving technologies, which inherently carry significant risks. The underlying software, blockchain infrastructure, smart contracts, and related technologies are still in their early stages of development, meaning there is no guarantee that the process of receiving, using, or holding Tokens will be uninterrupted or error-free. As with any novel technology stack, there is an inherent risk that
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	<p>the underlying blockchain, smart contracts, or associated components may contain weaknesses, vulnerabilities, or bugs, despite audits being conducted. Such issues could lead to unintended behaviors, security breaches, or critical failures, potentially resulting in the partial or complete loss of Tokens or their functionality. Additionally, unforeseen technical limitations, incompatibilities, or the emergence of superior alternatives could further impact the stability, security, and long-term viability of the Polygon ecosystem.</p> <p>Industry and Competition Risk: The project is and will be subject to all the risks and uncertainties associated with any new venture, visionary projects, including the risk that the project cannot be realized in line with its original purpose or vision about the Network. Other projects may have the same or a similar vision as the project. There are several other crypto-assets and projects, and new competitors may enter the market at any time. The effect of new or additional competition on the Token or its market price cannot be predicted or quantified. Competitors may have significantly greater financial and legal resources than the project and there is no guarantee that the project will be able to compete successfully, or at all, with such competitors. Moreover, increased competition may severely impact on the profitability and creditworthiness of the project and involved entities.</p> <p>Dependency/Withdrawing Partners Risk: The Polygon Technology itself relies on third-party technologies, infrastructures, and protocols, which could impact its functionality, security, and long-term sustainability. Such is specifically the case of Embedded Applications. Loss or changes in the key partners providing such technologies can lead to disruptions, loss of trust, or project failure. Any disruptions, vulnerabilities, regulatory scrutiny, or changes in operation of third-party technologies (such as modifications to its mechanisms, governance, or economic incentives) could directly affect the usability and security of the Polygon Technology, which may result in a negative effect for the Tokens. If the third-party technologies experience technical failures, security breaches, or regulatory intervention, it could severely impact the stability and performance of Polygon Technology, potentially limiting its intended functionality and value. This reliance on external infrastructure increases systemic risk, as unforeseen issues in third-party protocols could cascade into disruption within the Token ecosystem.</p> <p>Withdrawing Partners Risk: This is the risk that the Company faces in its business relationships with one or more third parties. The implementation of the project depends strongly on the collaboration and functioning of services provided by several third parties and other crucial</p>
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		<p>partners. The Company thus cannot guarantee that the project and related Polygon Technology will be successfully developed further.</p> <p>Unanticipated Risks: In addition to the risks outlined in this Section, unforeseen risks may arise. Additionally, new risks could emerge such as unexpected variations or combinations of the risks discussed in these Sections I.1 to I.5</p>
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I.5 Technology-Related Risks

I.5	Technology-Related Risks	<p>The Company and its affiliate, directors and officers shall not be responsible or liable for any damages, losses, costs, fines, penalties or expenses of whatever nature, whether reasonably foreseeable by them and the Token holder, and which the Token holder, may suffer, sustain, or incur, arising out of or relating to the technical risks outlined below or a combination thereof.</p> <ul style="list-style-type: none"> ▪ General Cybercrime Risk: The Token holder acknowledges that, despite best efforts to enhance security, the technological components supporting the Token, including its blockchain infrastructure, smart contracts, and wallets, may be vulnerable to cyberattacks. Malicious actors may exploit software vulnerabilities, attack consensus mechanisms, or compromise private keys to gain unauthorized access to Tokens. Risks include hacking attempts on the Protocol, smart contract exploits, phishing attacks, malware infections, and other forms of cybercrime that could result in the theft, loss, or unauthorized transfer of Tokens. Since digital assets exist entirely in a technological environment, they are inherently exposed to evolving cyber threats, some of which may be undetectable or irreparable until after significant damage has occurred. ▪ Blockchain-Level Risk: The Token holder understands and accepts that, as with other blockchains, the blockchain used for the issuance of the Tokens could be susceptible to consensus-related attacks, including but not limited to double-spend attacks, majority validation power attacks, censorship attacks, and byzantine behavior in the consensus algorithm or be subject to forks. Any successful attack or fork presents a risk to the Token, the expected proper execution and sequencing of Token -transactions and the expected proper execution and sequencing of contract computations as well as the Token balances in the wallet of the Token holders. ▪ Smart Contract-Level Risk: The issuance and transfers of Tokens rely on smart contracts deployed on a blockchain network, which introduce specific technical and security risks.
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	<ul style="list-style-type: none"> ▪ Smart contracts are self-executing, meaning any vulnerabilities, coding errors, or unforeseen logic flaws in the issuance contract could result in unintended consequences, such as the incorrect distribution of Tokens, loss of funds, or permanent locking of Tokens. Additionally, smart contracts are exposed to potential exploits, including hacking attempts, reentrancy attacks, and other forms of malicious activity that could compromise the security of the issuance process. ▪ Once deployed, the smart contract governing the issuance of Tokens cannot be easily altered or corrected, meaning any discovered vulnerabilities may be difficult or impossible to fix without significant coordination, community approval, or even a network fork. Furthermore, changes to the underlying blockchain protocol, such as updates to consensus mechanisms, transaction processing rules, or gas fee structures, could affect the functionality or cost-efficiency of the issuance smart contract. These risks could lead to disruptions in Token issuance, security breaches, or a loss of confidence in the Polygon ecosystem, potentially impacting the Token's value and usability.
	<p>Application-Level Risk: It cannot be excluded that any technical failure, malfunction, or vulnerability within an application interacting with Tokens could directly or indirectly impact the value of the Token.</p> <ul style="list-style-type: none"> ▪ An application could be subject to critical exploits, such as reentrancy attacks, logic errors, or oracle manipulation, which could lead to unintended Token transfers, assets being drained from the system, or Tokens being irretrievably lost. Fixing such issues may require significant coordination, governance approval, or even disruptive measures such as protocol migrations or forks, none of which are guaranteed to be successful. ▪ Because the Token's value is inherently tied to its functionality, any security breach could have cascading effects, including depreciation of the Token's value, reduced market confidence, and potential loss of funds for Token holders. <p>Finality or Irrevocability of Transactions: There is a risk that transactions may be irreversible, depending on the tools and service providers used to initiate them. Access to and any claim on such transactions could be lost indefinitely or permanently. For example, this could occur if (i) a blockchain address is entered incorrectly and the true owner is never identified, (ii) the private key associated with the address is lost, (iii) the address belongs to an entity that will not return the crypto asset, or (iv) the address belongs to an entity that may return the asset but requires additional actions, such as identity verification.</p>

		<ul style="list-style-type: none"> ■ Unanticipated Risks: In addition to the risks outlined in this Section, unforeseen risks may arise. Additionally, new risks could emerge such as unexpected variations or combinations of the risks discussed in these Sections I.1 to I.5.
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I.6 Mitigation Measures

I.6	Mitigation Measures	<p>Various measures to mitigate the risks outlined in Sections I.01 to I.05 above have been implemented. These include rigorous technology testing and auditing, and the careful selection of personnel, management, and third-party partners. However, many of these risks are inherent to the activities with crypto assets and the broader ecosystem, making complete elimination impossible.</p> <p>To further reduce exposure to these risks, prospective Token holders should adopt appropriate safeguards based on their chosen custody method and remain vigilant by actively monitoring publicly available news and market signals, enabling them to respond swiftly to significant developments which may result in the materialization of specific risks.</p>
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PART A - INFORMATION ABOUT THE OFFEROR OR THE PERSON SEEKING ADMISSION TO TRADING

A.1 Name

A.1	Name	Polygon Labs Services (Switzerland) AG ("Company")
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A.2 Legal Form

A.2	Legal Form	Corporation (<i>Aktiengesellschaft</i>) with limited liability under the laws of Switzerland
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A.3 Registered Address

A.3	Registered Address	Baarerstrasse 98, 6300 Zug, Canton of Zug, Switzerland
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A.4 Head Office

A.4	Head Office	Not applicable.
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A.5 Registration Date

A.5	Registration Date	2023-01-05 <i>The Company was originally incorporated under the name Ptech Services AG and subsequently renamed Polygon Labs Services (Switzerland) AG, accompanied by an amendment to its corporate purpose, on 2023-01-27.</i>
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A.6 Legal Entity Identifier

A.6	Legal Entity Identifier	9845000C4775C78EDA15
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A.7 Another Identifier Required Pursuant to Applicable National Law

A.7	Another Identifier Required Pursuant to Applicable National Law	Swiss Registration Number: CHE-275.116.509
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A.8 Contact Telephone Number

A.8	Contact Telephone Number	+1 (805) 409-7113
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A.9 E-mail Address

A.9	E-mail Address	legal-notices@polygon.com
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A.10 Response Time (Days)

A.10	Response Time (Days)	Fourteen (14) working days
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A.11 Parent Company

A.11	Parent Company	Polygon Labs Holdings (Cayman) Ltd.
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A.12 Members of the Management Body

A.12	Members of the Management Body	<p>The management body is composed of a sole director as identified below:</p> <table border="1"><thead><tr><th>Name</th><th>Role</th><th>Principal Place of Business</th></tr></thead><tbody><tr><td>Marc Palacio Rodriguez</td><td>Director</td><td>Baarerstrasse 98, 6300 Zug, Canton of Zug, Switzerland</td></tr></tbody></table>	Name	Role	Principal Place of Business	Marc Palacio Rodriguez	Director	Baarerstrasse 98, 6300 Zug, Canton of Zug, Switzerland
Name	Role	Principal Place of Business						
Marc Palacio Rodriguez	Director	Baarerstrasse 98, 6300 Zug, Canton of Zug, Switzerland						

A.13 Business Activity

A.13	Business Activity	The Company provides services in the fields of software and business development, other consulting services, contract brokerage, and administration, in particular for enterprises affiliated with the Company.
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A.14 Parent Company Business Activity

A.14	Parent Company Business Activity	Polygon Labs Holdings (Cayman) Ltd. supports the development, adoption and growth of the Network and its ecosystem.
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A.15 Newly Established

A.15	Newly Established	True.
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A.16 Financial Condition for the Past Three Years

A.16	Financial Condition for the Past Three Years	Not available. The Company has been registered for less than 3 years.
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A.17 Financial Condition Since Registration

A.17	Financial Condition Since Registration	Source of Financial Resources. The financial condition of the Company is stable, supported by revenue generated through transfer-pricing services provided to other entities within the Polygon ecosystem, including its parent company, Polygon Labs Tokens (Cayman) Ltd. Cash outflows primarily relate to ordinary operating activities. As of the date of this White Paper, no unusual
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		<p>cash-flow events have been identified that would materially affect the Company's financing structure.</p> <p>Sufficiency of Financial Resources. Given the above, the Company possesses sufficient financial resources to support its activities, and, at present, it does not face material financial risks or uncertainties that would affect its financial viability.</p>
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PART B - INFORMATION ABOUT THE ISSUER (IF DIFFERENT FROM THE OFFEROR OR PERSON SEEKING ADMISSION TO TRADING**B.1 Issuer Different from Offeror or Person Seeking Admission to Trading**

B.1	Issuer Different from Offeror or Offeror	True.
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B.2 Name

B.2	Name	Matic Network (BVI) Ltd. ("Issuer")
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B.3 Legal Form

B.3	Legal Form	Limited liability company under the laws of the British Virgin Islands.
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B.4 Registered Address

B.4	Registered Address	c/o Harneys Corporate Services BVI Craigmuir Chambers, Road Town, Tortola, VG 1110, British Virgin Islands
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B.5 Head Office

B.5	Head Office	Not applicable.
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B.6 Registration Date

B.6	Registration Date	2018-09-26
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B.7 Legal Entity Identifier

B.7	Legal Entity Identifier	Not available.
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B.8 Parent Company

B.9	Parent Company	Polygon Labs Holdings (Cayman) Ltd.
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B.9 Another Identifier Required Pursuant to Applicable National Law

B.8	Another identifier required pursuant to applicable national law	BVI Registration Number: 1993457.
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B.10 Members of the Management Body

B.10	Members of the Management body	The management body is composed of a sole director as identified below:		
		<i>Name</i>	<i>Role</i>	<i>Principal Place of Business</i>
		Claire Abrehart	Director	c/o Harneys Corporate Services BVI Craigmuir Chambers, Road Town, Tortola, VG 1110, British Virgin Islands

B.11 Business Activity

B.11	Business Activity	The Issuer supports the Polygon ecosystem, specifically through the provision of technical and related services in relation to the Token.
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B.12 Parent Company Business Activity

B.12	Parent Company Business Activity	Polygon Labs Holdings (Cayman) Ltd. supports the development, adoption and growth of the Network and its ecosystem.
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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**

C.1	Name	Not applicable.
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C.2 Legal Form

C.2	Legal Form	Not applicable.
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C.3 Registered Address

C.3	Registered Address	Not applicable.
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C.4 Head Office

C.4	Head Office	Not applicable.
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C.5 Registration Date

C.5	Registration Date	Not applicable.
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C.6 Legal Entity Identifier of the operator of the Trading Platform

C.6	Legal Entity Identifier of the Operator of the Trading Platform.	Not applicable.
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C.7 Another Identifier Required Pursuant to Applicable National Law

C.7	Another Identifier Required Pursuant to Applicable National Law	Not applicable.
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C.8 Parent Company

C.8	Parent Company	Not applicable.
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C.9 Reason for Crypto-Asset White Paper Preparation

C.9	Reason for Crypto-Asset White Paper Preparation	Not applicable.
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C.10 Members of the Management Body

C.10	Members of the Management body	Not applicable.
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C.11 Operator Business Activity

C.11	Operator Business Activity	Not applicable.
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C.12 Parent Company Business Activity

C.12	Parent Company Business Activity	Not applicable.
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C.13 Other persons drawing up the white paper under Article 6 (1) second subparagraph, of Regulation (EU) 2023/1114

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.
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C.14 Reason for drawing up the white paper under Article 6 (1) second subparagraph MiCAR

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.
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PART D - INFORMATION ABOUT THE CRYPTO-ASSET PROJECT

D.1 Crypto-Asset Project Name

D.1	Crypto-Asset Project Name	Polygon PoS Network
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D.2 Crypto-Assets Name

D.2	Crypto-Assets Name	POL Token
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D.3 Abbreviation

D.3	Abbreviation	\$POL
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D.4 Crypto-Asset Project Description

D.4	Crypto-Asset Project Description	<p>The Network is a leading blockchain stack facilitating near-instant, low-cost, global transactions at scale. The Network began as scaling system designed to increase Ethereum's throughput by providing low-cost, high-performance environments while utilizing Ethereum in periodic state or proof commitments. The Network is thus EVM-compatible and maintains strong security through a decentralized validator set. Over time, governments and leading institutions have chosen the Network to deploy various applications due to its reliable infrastructure and security.</p> <p>The Network is thus a core component of the broader Polygon ecosystem whose components support scalable, interoperable, and resilient decentralized applications across a broad range of use cases.</p> <p>The Network is not owned, operated or controlled by the Company, the Issuer or any other entity.</p>
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D.5 Details of all persons involved in the implementation of the crypto-asset project

D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project	Name and Address	Provided Support
		Hotjar Ltd. Dragonara Business Centre, 5th Floor Dragonara Road, Paceville	Marketing Services

	<p>St Julian's STJ 3141 Malta</p> <p>Webflow, Inc. 398 11th St San Francisco CA, 94103 United States</p>	Marketing Services
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D.6 Utility Token Classification

D.6	Utility Token Classification	True.
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D.7 Key Features of Goods/Services for Utility Token Projects

D.7	Key Features of Goods/Services for Utility Token Projects	<p>The Token grants access to the functionalities presented under Section F.02.</p> <p>All the above functionalities are purely technical and do not confer any rights against any entity nor impose any obligations on Token holders in a legal sense.</p> <p>All the above functionalities are made available on an “as is” basis.</p> <p>The quantity and quality of each functionality is determined respectively, by the circulating supply of the Token available for effective use and the overall state of the Network. As the Network evolves and engagement therewith too, both factors will be shaped by effective Network participants at any given time and overall Network development, making them currently unquantifiable.</p>
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D.8 Plans for the Token

D.8	Plans for the Token	<p>Milestones achieved on or prior to the date of this White Paper:</p> <ul style="list-style-type: none"> ▪ Network testnet launch: the original Matic Network public testnet (“Counter Stake”) went live in June 2019; ▪ Network mainnet launch: The core Proof-of-Stake (PoS) mainnet (validator-managed) launched in May 2020, initially launched as “mainnet beta,” opening staking, validator operations, and the production PoS bridge;
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		<ul style="list-style-type: none"> ▪ Token Launch Event: MATIC was publicly launched on April 24, 2019 through Binance Launchpad, which established the initial circulating MATIC supply; ▪ MATIC to POL upgrade: The upgrade from MATIC to POL went live in September, 2024.
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D.9 Resource Allocation

D.9	Resource Allocation	Presently, the financial resources of the Company are used in line with its activities within the Polygon ecosystem, as described under Section A.17.
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D.10 Planned Use of Collected Funds or Crypto-Assets

D.10	Planned Use of Collected Funds or Crypto-Assets	Not applicable. This White Paper relates to an admission to trading; accordingly, no funds are collected in connection with this process.
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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

E.1	Public Offering or Admission to Trading	ATTR – admission to trading
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E.2 Reasons for Public Offer or Admission to Trading

E.2	Reasons for Public Offer or Admission to trading	Ecosystem Expansion: The admission of the Token to trading is intended to further promote broad market access for potential Network users and thereby support ongoing engagement and use of the Network.
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E.3 Fundraising Target

E.3	Fundraising Target	Not applicable, see response provided under Section E.1.
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E.4 Minimum Subscription Goals

E.4	Minimum Subscription Goals	Not applicable, see response provided under Section E.1.
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E.5 Maximum Subscription Goal

E.5	Maximum Subscription Goals	Not applicable, see response provided under Section E.1.
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E.6 Oversubscription Acceptance

E.6	Oversubscription Acceptance	Not applicable, see response provided under Section E.1.
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E.7 Oversubscription Allocation

E.7	Oversubscription Allocation	Not applicable, see response provided under Section E.1.
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E.8 Issue Price

E.8	Issue Price	Not applicable, see response provided under Section E.1.
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E.9 Official Currency or Any Other Crypto-Assets Determining the Issue Price

E.9	Official Currency or any other Crypto-Assets Determining the Issue Price	Not applicable, see response provided under Section E.1.
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E.10 Subscription Fee

E.10	Subscription Fee	Not applicable, see response provided under Section E.1.
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E.11 Offer Price Determination Method

E.11	Offer Price Determination Method	Not applicable, see response provided under Section E.1.
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E.12 Total Number of Offered/Traded Crypto-Assets

E.12	Total Number of Offered/Traded Crypto-Assets	The Token was launched with an initial supply of 10 billion units and is subject to the Emission Rate described in Section G.12. As a result, the total supply as of the date of this White Paper is approximately 10.5 billion units. The portion of this total supply available for trading at any given time corresponds to the outstanding units not staked under the Validator Staking Functionality or the Delegated Staking Functionality, and not otherwise subject to lock-up, vesting, or similar transfer restrictions.
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E.13 Targeted Holders

E.13	Targeted Holders	ALL, meaning both Retail (RETL) and Professional (PROF)
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E.14 Holder Restrictions

E.14	Holder Restrictions	The Network is permissionless and decentralized by design. There are thus no restrictions at chain-level.
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		The Trading Platforms in accordance with applicable laws, including applicable international sanctions, and internal policies may impose restrictions on buyers and sellers of Tokens. Such restrictions are not implemented by the Company.
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E.15 Reimbursement Notice

E.15	Reimbursement Notice	Not applicable, see response provided under Section E.1.
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E.16 Refund Mechanism

E.16	Refund Mechanism	Not applicable, see response provided under Section E.1.
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E.17 Refund Timeline

E.17	Refund Timeline	Not applicable, see response provided under Section E.1.
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E.18 Offer Phases

E.18	Offer Phases	Not applicable, see response provided under Section E.1.
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E.19 Early Purchase Discount

E.19	Early Purchase Discount	Not applicable, see response provided under Section E.1.
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E.20 Time-Limited Offer

E.20	Time-Limited Offer	Not applicable, see response provided under Section E.1.
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E.21 Subscription Period Beginning

E.21	Subscription Period Beginning	Not applicable, see response provided under Section E.1.
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E.22 Subscription Period End

E.22	Subscription Period End	Not applicable, see response provided under Section E.1.
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E.23 Safeguarding Arrangements for Offered Funds/Crypto-Assets

E.23	Safeguarding Arrangements for Offered Funds/Crypto-Assets	Not applicable, see response provided under Section E.1.
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E.24 Payment Methods for Crypto-Asset Purchase

E.24	Payment Methods for Crypto-Asset Purchase	Not applicable, see response provided under Section E.1.
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E.25 Value Transfer Methods for Reimbursement

E.25	Value Transfer Methods for Reimbursement	Not applicable, see response provided under Section E.1.
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E.26 Right of Withdrawal

E.26	Right of Withdrawal	Not applicable, see response provided under Section E.1.
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E.27 Transfer of Purchased Crypto-Assets

E.27	Transfer of Purchased Crypto-Assets	<p>The Tokens acquired as a result of trades shall be transferred to the compatible wallet or technical device as designated by the selected Trading Platforms.</p> <p>The Company bears no responsibility for any transfers of the Token between market participants on the Trading Platforms.</p>
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E.28 Transfer Time Schedule

E.28	Transfer Time Schedule	The transfer of the Tokens acquired as a result of trades conducted on the Trading Platforms may or may not occur immediately, depending on the functioning of the selected Trading Platform.
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		The Company has no control over the timing of such transfers.
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E.29 Purchaser's Technical Requirements

E.29	Purchaser's Technical Requirements	<p>Token holder must comply with the technical requirements specific to the Trading Platforms on which the Token is admitted to trading, which may include the following:</p> <ul style="list-style-type: none"> ▪ A device (computer or mobile) to manage digital wallet/private key and/or account on exchange to carry out transactions. ▪ A compatible digital wallet or account on the Launchpad and Trading Platform; and ▪ Internet access.
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E.30 Crypto-asset service provider (CASP) name

E.30	Crypto-asset service provider (CASP) name	Not applicable.
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E.31 CASP Identifier

E.31	CASP Identifier	Not applicable.
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E.32 Placement Form

E.32	Placement Form	Not applicable, see response provided under Section E.1.
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E.33 Trading Platforms Name

E.33	Trading Platform Names	<p>The Token has also been trading on the following Trading Platforms in the EU since September 2024 (each of which had previously admitted MATIC to trading): Coinbase, Crypto.com, and Kraken.</p> <p>Additional listings are sought but were not yet confirmed.</p> <p>The up-to-date list of confirmed and available Trading Platforms will be maintained on the Company's website.</p>
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E.34 Trading Platforms Market Identifier Code (MIC)

E.34	Trading Platforms Market Identifier Code (MIC)	Not available.
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E.35 Trading Platforms Access

E.35	Trading Platforms Access	Trading Platforms are accessible via their respective desktop and/or mobile based interfaces.
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E.36 Involved Costs

E.36	Involved Costs	The use of services offered by Trading Platforms may involve costs, including transaction fees, withdrawal fees, and other charges, as notified to users in advance. These costs are determined and set by the respective Trading Platforms and are not controlled, influenced, or governed by the Company. Consequently, any changes to initially announced fee structures or the introduction of new costs for the future are solely at the discretion of the Trading Platforms.
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E.37 Offer Expenses

E.37	Offer Expenses	Not applicable, see response provided under Section E.1.
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E.38 Conflicts of Interest

E.38	Conflicts of Interest	The Company is not aware of any potential conflict of interest among its management body members or any other person within the Company with respect to the admission to trading of the Token.
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E.39 Applicable Law

E.39	Applicable Law	Any dispute arising out of or in connection with the present White Paper, the Company, and the admission to trading shall be governed exclusively by the laws of Switzerland, without regard to conflict of law rules or principles, except to the extent that such disputes are governed by applicable law pursuant to the terms and conditions of a Trading Platform.
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E.40 Competent Court

E.40	Competent Court	Any dispute arising out of or in connection with the present White Paper, Company and the admission to trading shall be exclusively resolved by arbitration.
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	<p>The arbitral proceedings shall be conducted in accordance with the Swiss Rules of International Arbitration of the Swiss Arbitration Centre in force on the date on which the Notice of Arbitration is submitted in accordance with those Rules.</p> <p>The number of arbitrators shall be three.</p> <p>The seat of the arbitration shall be Zürich, Switzerland.</p> <p>The arbitral proceedings shall be conducted in English.</p> <p>A respective arbitral award may only be challenged before the Swiss Supreme Court on the limited grounds as provided in Article 190 para. 2 Swiss Private International Law Act, i.e. (i) improper constitution of the arbitral tribunal; (ii) incorrect decision on jurisdiction; (iii) award beyond the claims submitted or failing to decide all claims submitted; (iv) violation of a party's right to be heard or of its right to equal treatment; and (v) incompatibility of the award with public policy.</p>
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PART F - INFORMATION ABOUT THE CRYPTO-ASSETS

F.1 Crypto-Asset Type

F.1	Crypto-Asset Type	Other Crypto Asset
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F.2 Crypto-Asset Functionality

F.2	Crypto-Asset Functionality	<p>The Token grants access to the following functionalities in relation to the Network:</p> <ul style="list-style-type: none"> ▪ Gas Functionality: The Token serves to pay for the gas required to transact on the Network; ▪ Validator Staking Functionality: Tokens can be staked to join the Network as a validator, thereby contributing to its consensus mechanism, therefore verifying and assembling transactions into blocks in exchange for rewards (“Validator Rewards”). Network validators are also responsible for voting on proposed upgrades and modifications to the Network protocol, with the implementation of such changes being contingent upon validator approval. <p><i>The validators may thus adopt Network upgrades that modify or extend the functionalities associated with the Token. Any such upgrades are outside the control and responsibility of the Company and the Issuer.</i></p> <ul style="list-style-type: none"> ▪ Delegated Staking Functionality: Token holders may delegate their Tokens to other participants who act as validators, rather than directly joining the Network in those roles themselves, while still benefiting from the Validator Rewards generated by the participants to whom they have delegated. <p>All the above functionalities are purely technical and do not confer any rights against any entity nor impose any obligations on Token holders in a legal sense.</p> <p>All the above functionalities are made available on an “as is” basis.</p>
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F.3 Planned Application of Functionalities

F.3	Planned Application of Functionalities	All functionalities are already operational and available for immediate use.
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F.4 Type of White Paper

F.4	Type of White Paper	OTHR
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F.5 The type of submission

F.5	The type of submission	NEWT
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F.6 Crypto-Asset Characteristics

F.6	Crypto-Asset Characteristics	<ul style="list-style-type: none">▪ Issued on Ethereum based on the ERC-20 standard.▪ Initial supply of 10 billion units, with annual automated emissions for Staking Rewards and community growth (see Section G.12)▪ Token issued as a utility token of the Network with the functionalities described under Section F.2.▪ Token does not carry any legally enforceable rights or entitlements against the issuer (see Section G.1).
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F.7 Commercial Name or Trading Name

F.7	Commercial Name or Trading Name	POL
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F.8 Website of the Company

F.8	Website of the Company	https://polygon.technology/
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F.9 Starting date of the Admission to Trading

F.9	Starting date of the Offer or Admission to Trading	Unknown.
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F.10 Publication Date

F.10	Publication Date	2026-01-09 at the earliest.
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F.11 Any other Services Provided by the Issuer

F.11	Any other Services Provided by the Issuer	Not applicable.
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F.12 Identifier of Operator of the Trading Platform

F.12	Identifier of Operator of the Trading Platform	Not available.
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F.13 Language of the White Paper

F.13	Language of the White Paper	English
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F.14 Digital Token Identifier Code

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	Not available.
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F.15 Functionally Fungible Group Digital Token Identifier, where available

F.15	Functionally Fungible Group Digital Token Identifier, where available	Not available.
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F.16 Voluntary data flag

F.16	Voluntary Data Flag	False
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F.17 Personal Data Flag

F.17	Personal Data Flag	True
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F.18 LEI Eligibility

F.18	LEI Eligibility	False.
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F.19 Home Member State

F.19	Home Member State	Ireland pursuant to Article 3 (33) (c) of MiCAR.
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F.20 Host Member States

F.20	Host Member State	The offer and admission to trading of the Token is passported in all the EU and EEA countries.
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PART G - INFORMATION ON THE RIGHTS AND OBLIGATIONS ATTACHED TO THE CRYPTO-ASSETS**G.1 Purchaser Rights and Obligations**

G.1	Purchaser Rights and Obligations	<p>The Tokens do not carry any legally enforceable rights or entitlements against the issuer. Instead, Tokens enable their holders to interact with the Network. The Network operates autonomously without the Company having an operative role of any sort.</p> <p>The Company, to the fullest extent permitted by applicable laws, disclaims all warranties, whether express or implied, in relation to the Token and its functionality, as well as the Network. This includes, but is not limited to, implied warranties of merchantability and fitness for a particular purpose.</p>
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G.2 Exercise of Rights and Obligation

G.2	Exercise of Rights and Obligations	Not applicable, see answer under G.1.
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G.3 Conditions for Modifications of Rights and Obligations

G.3	Conditions for modifications of rights and obligations	Not applicable, see answer under G.1.
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G.4 Future Public Offers

G.4	Future Public Offers	The Company does not plan to proceed with any additional public offers of the Token as of the date of publication of this White Paper.
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G.5 Issuer Retained Crypto-Assets

G.5	Issuer Retained Crypto-Assets	The Issuer does retain approximately 2 billion Token units in its treasury for its own use.
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G.6 Utility Token Classification

G.6	Utility Token Classification	True.
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G.7 Key Features of Goods/Services of Utility Tokens

G.7	Key Features of Goods/Services of Utility Tokens	<p>The Token grants access to the functionalities presented under Section F.02.</p> <p>The quantity and quality of each functionality is determined respectively, by the circulating supply of the Token available for effective use and the overall state of the Network. As the Network evolves and engagement therewith too, both factors will be shaped by effective Network participants at any given time and overall Network development, making them currently unquantifiable.</p>
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G.8 Utility Tokens Redemption

G.8	Utility Tokens Redemption	<p>The functionalities described under F.02. can be redeemed by using the Network and calling the appropriate functions thereof.</p> <p>In case of Network issues, Tokens may not be usable and effectively become irredeemable.</p> <p>No fiduciary redemption exists, a User cannot redeem Tokens with the Issuer, the Company or any other entity, for money or other assets.</p>
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G.9 Non-Trading Request

G.9	Non-Trading Request	False.
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G.10 Crypto-Assets Purchase or Sale Modalities

G.10	Crypto-Assets Purchase or Sale Modalities	Not applicable.
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G.11 Crypto-Assets Transfer Restrictions

G.11	Crypto-Assets Transfer Restrictions	See field E.14 above.
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G.12 Supply Adjustment Protocols

G.12	Supply Adjustment Protocols	<p>The Token was launched with an initial supply of 10 billion units and is subject to an annual compounding emission mechanism ("Emission Rate") managed through the decentralized governance of validators (see Section F.2). Emissions are administered by the EmissionManager contract, having exclusive authority over new Token mints, as constrained by a hardcoded mintPerSecondCap. Newly minted Tokens are allocated to serve as Validator Rewards (see below). As of the date of this White Paper, the Emission Rate is set at 2% per annum, resulting in a total circulating supply of approximately 10.5 billion units.</p>
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		<i>Validators may thus modify the Token supply. Any such changes are outside the control and responsibility of the Company and the Issuer.</i>
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G.13 Supply Adjustment Mechanisms

G.13	Supply Adjustment mechanisms	As described under Section G.12, the supply adjustment protocol governing the Emission Rate is subject to the decentralized governance by validators, as the latter is described under Section F.2.
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G.14 Token Value Protection Schemes

G.14	Token Value Protection Schemes	False.
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G.15 Token Value Protection Schemes Description

G.15	Token Value Protection Schemes Description	Not applicable. See answer under Section G.14.
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G.16 Compensation Schemes

G.16	Compensation Schemes	False
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G.17 Compensation Schemes Description

G.17	Compensation Schemes Description	Not applicable. See answer under Section G.16.
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G.18 Applicable Law

G.18	Applicable Law	Any dispute arising out of or in connection with the Token shall be governed exclusively by the laws of British Virgin Islands, without regard to conflict of law rules or principles, except to the extent that such disputes are governed by applicable law pursuant to the terms and conditions of the respective Trading Platform on which the Token has been offered or admitted for trading.
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G.19 Competent Court

G.19	Competent Court	<p>Any dispute relating to the Token shall be exclusively resolved shall be resolved exclusively by arbitration. The arbitral proceedings shall be conducted in accordance with the Arbitration Act (as amended) of the British Virgin Islands.</p> <p>The number of arbitrators shall be one.</p> <p>The seat of the arbitration shall be the British Virgin Islands.</p> <p>The arbitral proceedings shall be conducted in English.</p> <p>Any action that may not be submitted to arbitration under applicable law will be tried by a court of competent jurisdiction located in the British Virgin Islands, and the Parties submit to the jurisdiction of the British Virgin Islands for this limited purpose.</p>
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PART H – INFORMATION ON THE UNDERLYING TECHNOLOGY

H.1 Distributed Ledger Technology

H.1	Distributed Ledger Technology	<p><u>General Information on Distributed Ledger Technology and Blockchain</u></p> <p>Distributed Ledger Technology (“DLT”) describes a decentralized and distributed Network system architecture where multiple participants maintain and verify a shared database. Unlike traditional databases, DLT systems do not rely on a central authority to ensure data consistency and security. Rather, they distribute control across a Network of computers (nodes) and require all changes to be recorded and agreed by the nodes. This distributed approach enhances the resilience and security of such a system, and transparency of the data stored in it without the need for trust between the actors of the systems.</p> <p>Blockchain technology is a subset of DLT, where the distributed database maintains a continuously growing list of records, called blocks, which are linked together in chronological order and secured using cryptographic techniques. A blockchain generally has the following key characteristics:</p> <ul style="list-style-type: none">▪ Security: A blockchain employs advanced cryptographic methods to secure data. Each block contains a cryptographic hash (a “digital fingerprint”) of the previous block, a timestamp, and transaction data.▪ Consensus: Blockchains rely on a predefined consensus mechanism establishing how new blocks, and the transactions included therein, are approved by nodes.
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	<ul style="list-style-type: none"> ▪ <i>Immutability</i>: once data is recorded in a block, it cannot be deleted nor altered retroactively without also changing all subsequent blocks, which would require consensus from most of the nodes. ▪ <i>Transparency</i>: Transactions on a blockchain are usually visible to all, thereby providing transparency. Private blockchains, without or with limited transparency, however, do also exist. ▪ <i>Accessibility</i>: Blockchains are usually permissionless, thus accessible to all, whether to act as a node or to submit transactions to be recorded thereon. Permissioned blockchains, with limited accessibility for nodes and/or users, however, do also exist. <p><u>About Ethereum</u></p> <p>The Token is issued on the Ethereum permissionless public blockchain. Ethereum aims to provide a decentralized, secure, and scalable Company for financial services, digital identity, supply chains, and other real-world use cases. Ethereum benefits from widespread adoption and has constant on-chain activity.</p> <p>Launched in 2015, Ethereum introduced a Turing-complete virtual machine, enabling developers to create and execute programmable contracts without intermediaries, commonly referred to as smart contracts. Ethereum has undergone significant upgrades, including its transition to Ethereum 2.0 via the Merge, which replaced its original Proof-of-Work (PoW) consensus mechanism with Proof-of-Stake (PoS) to improve energy efficiency and scalability (more details on consensus under Section H.04). Its code has been audited several times.</p> <p>Ethereum's native cryptocurrency, Ether (ETH), serves as the primary medium of exchange within the network. It is used to pay transaction fees (gas), incentivize validators, and participate in governance and staking.</p> <p>Ethereum operates with a layered architecture that separates different functions for modularity and scalability:</p> <ul style="list-style-type: none"> ▪ Execution Layer (Ethereum Virtual Machine - EVM): The EVM is the computational layer that processes smart contract execution and dApp interactions. It enables Turing-complete programming, allowing developers to write and deploy complex applications using languages like Solidity and Vyper ▪ Consensus Layer (Beacon Chain): The Beacon Chain handles validator coordination, staking, and the consensus mechanism implementation. It ensures security and finality for transactions processed by the Execution Layer. ▪ (Optional) Data Availability & Scalability Solutions (Rollups & Sharding): Rollups (Optimistic & ZK-Rollups) can be used to offload computation from the main Ethereum chain while retaining security; Sharding (Future Upgrade) is planned to be implemented to divide network operations across multiple smaller chains (shards) to enhance scalability. <p>For more details, visit Ethereum's official documentation and repositories:</p> <ul style="list-style-type: none"> ▪ Ethereum Company: https://ethereum.org
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		<ul style="list-style-type: none"> ▪ Ethereum Developer Resources: https://ethereum.org/en/developers/ ▪ Ethereum GitHub Repositories: https://github.com/ethereum <p><u>About the Network</u></p> <p>The Token will be foremostly transacted on the Network despite being issued on Ethereum. Because the Network is a permissionless Layer 2 blockchain built relying on Ethereum, under sections H.02 to H.05, explanations focus on Ethereum.</p>
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H.2 Protocols and Technical Standards

H.2	Protocols and Technical Standards	<p>The Token is linked to the following protocols:</p> <ul style="list-style-type: none"> ▪ Network Protocol: The Token serves as gas and may be transacted on the Network: the Token is governed by Network rules in such context. ▪ Ethereum Protocol: the Token was natively issued on Ethereum and is subject to its ERC-20 issuance standard. ▪ Other smart contracts: The Token may be used by applications deployed on Ethereum and the Network. Its usage in such context is thus also governed by the relevant smart contracts constituting such applications. ▪ Other technology provided by third party providers, and providing, amongst other, wallets, bridges, oracles and alike. ▪ Partner integrations with the Network rely on APIs.
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H.3 Technology Used

H.3	Technology Used	<p>Transfer: The token issuance smart contracts, as based on the ERC-20 standard, define the technical rules governing the transfer of Tokens. No additional technology is required to proceed with the transfer of Tokens. Tokens can be bridged to the Network via a canonical bridge, and if available at any given time, additional third-party bridges.</p> <p>Holding and Storing: No additional technology is required to hold Tokens, as they remain on Ethereum in accordance with its standard operation; however, users may choose to utilize additional technologies such as specific wallets, incl. multi-signature wallets, cold storage solutions, or other storage and security products and services.</p>
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H.4 Consensus Mechanism

H.4	Consensus Mechanism	<p>Ethereum</p> <ul style="list-style-type: none">■ The consensus mechanism of Ethereum is a PoS (proof-of-stake) system known as the Beacon Chain, which coordinates the network by selecting validators who propose and validate new blocks. Validators are chosen based on the amount of ETH they have staked, rather than computational power, significantly reducing Ethereum's energy consumption by over 99% compared to PoW.■ Ethereum has over 1 million validators as of date of writing.■ Key features of Ethereum's PoS system:<ul style="list-style-type: none">■ Validators and Staking: Participants must stake at least 32 ETH to become a validator, securing the network while earning staking rewards. Smaller ETH holders can participate via staking pools.■ Epochs and Slots: Ethereum's PoS mechanism divides time into epochs and slots, ensuring an orderly block validation process.■ Slashing Mechanism: Validators who engage in dishonest behavior risk losing a portion of their staked ETH as a penalty
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H.5 Incentive Mechanisms and Applicable Fees

H.5	Incentive Mechanism and Applicable Fees	<p>Ethereum transactions, such as the transfer of Tokens, require gas fees, which compensate validators for processing transactions and executing smart contracts.</p> <p>The EIP-1559 upgrade introduced a base fee model to improve fee predictability and burn a portion of transaction fees, reducing ETH inflation. As a result, the key fee components are the following:</p> <ul style="list-style-type: none">■ Base Fee: Minimum amount burned per transaction, adjusting dynamically based on network demand. As a result, ETH has periodically become deflationary when network activity is high, as more ETH is burned than issued, reducing overall supply.■ Priority Fee (Tip): Optional fee paid to incentivize faster transaction processing.■ Max Fee: Maximum gas price a user is willing to pay, ensuring cost control. Trading Platforms may besides charge service fees in accordance with their own policies.
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H.6 Use of Distributed Ledger Technology

H.6	Use of Distributed Ledger Technology	False – The Company, nor any affiliated entity, does not operate the DLT.
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H.7 DLT Functionality Description

H.7	DLT Functionality Description	Not applicable.
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H.8 Audit

H.8	Audit	True
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H.9 Audit Outcome

H.9	Audit Outcome	<p>The Company is committed to ensuring the secure development of smart contracts. To achieve this, the POL and Network's core smart contracts have undergone security audits. These audits can be found here: https://docs.polygon.technology/security/security/reports/#scope</p> <p>The Company obtained the ISO/IEC 27001:2022 certification for its Information Security Management System, following an independent audit by an accredited certification body. This certification confirms that the Company maintains a formally structured and continuously monitored framework for information-security risk management, covering relevant policies, processes, systems, and controls used in the development and operation of its technological infrastructure. The certification demonstrates adherence to internationally recognized standards for information security, thereby supporting the reliability and operational resilience of the technical support services provided to the Network.</p> <p>Additionally, the Polygon's Bug Bounty Program has been active on Immunefi and HackerOne since 2021. On Immunefi specifically it is the first program by Total Rewards Paid to security researchers with more than USD 7 million paid out to date. For more information please visit: https://imunefi.com/bug-bounty/polygon/information/</p> <p>Following best practices, the Company makes all smart contract code publicly available. This transparency allows independent security researchers to assess the code for potential vulnerabilities.</p>
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		<p>Disclaimer: While audits, certifications and bug bounties strengthen security, they do not guarantee the absence of all vulnerabilities. Undetected issues or new exploits could still arise, and investors should consider these risks. See also Part I and the information about the risks.</p>
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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

The Company provides information on principal adverse impacts of Token on the climate and other environment-related adverse impacts of the consensus mechanism of the following:

Based on an annual forecast of over 1 million transactions and acknowledging that these estimates are forward-looking and may prove inaccurate, the total yearly energy consumption of the Token on the Network is estimated to be less than 500,000 kWh. In any scenario, it is not expected to exceed this threshold.

General Information	
J.1.1. Name	Polygon Labs Services (Switzerland) AG
J.1.2. Relevant legal entity identifier	Not applicable.
J.1.3 Name of the crypto-asset	POL
J.1.4 Consensus Mechanism	See as further described under Section H.4.
J.1.5 Incentive Mechanisms and Applicable Fees	See description provided under Section H.5.
J.1.6 Beginning of the period to which the disclosure relates	2025-01-01
J.1.7 End of the period to which the disclosure relates	2025-12-31
Mandatory Key Indicator on Energy Consumption	
J.1.8 Energy Consumption	< 500'000 kWh per year
Sources and methodologies	
J.1.9 Energy Consumption Sources and Methodologies	<p>The energy consumption of < 500'000 kWh per year has been calculated using a set of assumptions and thus represents an estimate.</p> <p>The estimate did not account for any offsetting of energy consumption or other market-based mechanism as of the date of this estimation.</p>

	<p><i>Sources and Methodology:</i> Estimates follow the Crypto Carbon Ratings Institute (CCRI) and Cambridge DLT Sustainability Framework, applying standard parameters for node-level power × count × uptime.</p>
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