This white paper has been prepared in compliance with the requirements of the Commission Implementing Regulation 2024/2984 of 29 November 2024 implementing technical standards for the application of Regulation (EU) 2023/1114 of the European Parliament and of the Council with regard to forms, formats and templates for the crypto-asset white papers

White paper for crypto-assets other than asset-referenced tokens or e-money tokens

This crypto-asset white paper has not been approved by any competent authority in any Member State of the European Union. The offeror of the crypto-asset is solely responsible for the content of this crypto-asset white paper.

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
			F.13 Digital token identifier code used to uniquely identify the crypto-asset or each of the several crypto assets to which the white paper relates, where available F.14 Functionally fungible group digital token identifier, where available F.15 Voluntary data flag F.16 Personal data flag F.17 LEI eligibility F.18 Home Member State F.19 Host Member States ***Part G - Information on the rights and obligations attached to the crypto-assets*** G.1 Purchaser rights and obligations G.2 Exercise of rights and obligations G.3 Conditions for modifications of rights and obligations G.4 Future public offers G.5 Issuer retained crypto-assets G.6 Utility token classification G.7 Key features of goods/services of utility tokens G.8 Utility tokens redemption G.9 Non-trading request G.10 Crypto-assets purchase or sale modalities G.11 Crypto-assets transfer restrictions G.12 Supply adjustment protocols G.13 Supply adjustment mechanisms G.14 Token value protection schemes G.15 Token value protection schemes description G.16 Compensation schemes G.17 Compensation schemes description G.18 Applicable law G.19 Competent court ***Part H – information on the underlying technology*** H.1 Distributed ledger technology (DTL) H.2 Protocols and technical standards H.3 Technology used H.4 Consensus mechanism H.5 Incentive mechanisms and applicable fees H.6 Use of distributed ledger technology

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01	Date of notification	Date of notification	2025-07-10
02	Statement in accordance with Article 6(3) of Regulation (EU) 2023/1114	This crypto-asset white paper has not been approved by any competent authority in any Member State of the European Union. The offeror of the crypto-asset is solely responsible for the content of this crypto-asset white paper.	This crypto-asset white paper has not been approved by any competent authority in any Member State of the European Union. The offeror of the crypto-asset is solely responsible for the content of this crypto-asset white paper.
03	Compliance statement in accordance with Article 6(6) of Regulation (EU) 2023/1114	'This crypto-asset white paper complies with Title II of Regulation (EU) 2023/1114 of the European Parliament and of the Council and, to the best of the knowledge of the management body, the information presented in the crypto-asset white	This crypto-asset white paper complies with Title II of Regulation (EU) 2023/1114 of the European Parliament and of the Council and, to the best of the knowledge of the management body, the information presented in the crypto-asset white paper is fair, clear and not misleading and the crypto-asset white paper makes no omission likely to affect its import.

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		paper is fair, clear and not misleading and the crypto-asset white paper makes no omission likely to affect its import.'	
04	Statement in accordance with Article 6(5), points (a), (b), (c), of Regulation (EU) 2023/1114	'The crypto-asset referred to in this crypto-asset white paper may lose its value in part or in full, may not always be transferable and may not be liquid.'	The crypto-asset referred to in this crypto-asset white paper may lose its value in part or in full, may not always be transferable and may not be liquid.
05	Statement in accordance with Article 6(5), point (d), of Regulation (EU) 2023/1114	'The utility token referred to in this white paper may not be exchangeable against the good or service promised in this white paper, especially in the case of a failure or discontinuation of the crypto-asset project.'	The utility token referred to in this white paper may not be exchangeable against the good or service promised 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	The crypto-asset referred to in this white paper is not covered by the investor compensation schemes under Directive 97/9/EC of the European Parliament and of the Council or the deposit guarantee schemes under Directive 2014/49/EU of the European Parliament and of the Council.	The crypto-asset referred to in this white paper is not covered by the investor compensation schemes under Directive 97/9/EC of the European Parliament and of the Council or the deposit guarantee schemes under Directive 2014/49/EU of the European Parliament and of the Council.
		SUMMARY	
07	Warning in accordance with Article 6(7), second	'Warning This summary should be read as an introduction to	**Warning** This summary should be read as an introduction to the crypto-asset white paper.

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
	subparagraph, of Regulation (EU) 2023/1114	the crypto-asset white paper. The prospective holder should base any decision to purchase this crypto –asset on the content of the crypto-asset white paper as a whole and not on the summary alone. The offer to the public of this crypto-asset does not constitute an offer or solicitation to purchase financial instruments and any such offer or solicitation can be made only by means of a prospectus or other offer documents pursuant to the applicable national law. This crypto-asset white paper does not constitute a prospectus as referred to in Regulation (EU) 2017/1129 of the European Parliament and of the Council or any other offer document pursuant to Union or national law.'	The prospective holder should base any decision to purchase this crypto –asset on the content of the crypto-asset white paper as a whole and not on the summary alone. The offer to the public of this crypto-asset does not constitute an offer or solicitation to purchase financial instruments and any such offer or solicitation can be made only by means of a prospectus or other offer documents pursuant to the applicable national law. This crypto-asset white paper does not constitute a prospectus as referred to in Regulation (EU) 2017/1129 of the European Parliament and of the Council or any other offer document pursuant to Union or national law.
08	Characteristics of the crypto-asset	A brief, clear and non-technical description of the characteristics of the crypto asset including information about rights and obligations of the purchaser, procedure and conditions for the exercise of those rights and conditions, if any, under	DIMO (ticker: $DIMO) is a utility token for the DIMO Network – an open-source, decentralized platform for connected vehicle data and mobility applications. The token does not represent equity or ownership rights, nor does it provide any guaranteed return or entitlement; instead, it is used to access services, incentivize participation, and enable governance within the DIMO ecosystem. Holders can use $DIMO to unlock vehicle data streams, build and use mobility applications, and participate in protocol governance (voting on upgrades and improvements), as described in the DIMO documentation. However, holding $DIMO grants no claim on the assets, revenue, or profits of

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		which these rights and obligations may be modified.	any entity, and the token's value and utility depend entirely on the adoption and success of the DIMO Network. Type: Utility crypto-asset (ERC-20 token) on various Ethereum-compatible networks and others as may be added. $DIMO is fungible and divisible (18 decimal places) and exists on the Polygon blockchain (initial deployment) with interoperability via the official Polygon–Ethereum bridge. The protocol also leverages other decentralized technologies (e.g. non-fungible tokens (NFTs) representing vehicle identities and the Helium IoT network on Solana for data connectivity) to support its functionality. The underlying blockchains currently used (Polygon, Ethereum, Base, Solana) use Proof-of-Stake consensus (or equivalent), which generally entails lower energy usage than Proof-of-Work chains. The DIMO Network does not operate its own proprietary blockchain; instead, it builds atop these public distributed ledgers, and thus the issuer does not control the consensus mechanism or infrastructure of the DLT networks in use. Total Supply: 1,000,000,000 DIMO tokens (fixed maximum). The entire supply was generated at the Token Generation Event (TGE) on 12 December 2022, and tokens are being released over time according to the project's tokenomics plan. Supply may decrease due to token burn or increase via minting pursuant to tokenholder governance. Initial Distribution: No ICO or public sale was conducted. Instead, the genesis distribution allocated the supply as follows: ● 45% (450,000,000 DIMO) reserved for user rewards & airdrops to bootstrap the network. An initial airdrop was delivered to early adopters on 2022-12-12, rewarding users who connected their cars or contributed to the ecosystem (up to 67.5 million tokens were available in this airdrop). The remaining rewards are being distributed as ongoing rewards for vehicle data providers over approximately 40 years. This allocation is subject to change via governance. ● 25% (250,000,000 DIMO) allocated to the DIMO Treasury, which is controlled by the community via a DAO (DIMO Foundation) for funding development, grants, and ecosystem initiatives. Treasury tokens may be disbursed as grants or bounties to contributors, or sold in limited amounts to strategic partners/investors to raise funds for the project. Unclaimed tokens from the initial airdrop were returned to the treasury, and the treasury has conducted occasional private sales of tokens to investors, as allowed by governance. ● 30% (300,000,000 DIMO) allocated to core team members and early investors who funded and built the project. These tokens are subject to a vesting schedule: they began unlocking on 12 January 2025, with 1/36th of the allocation unlocking each month thereafter (fully unlocked by December 2027). Until unlocked, these tokens are non-transferable (locked by smart contract and/or legal agreement).

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			Token Emission & Release Schedule: In addition to the initial airdrop, $DIMO tokens enter circulation through a weekly issuance distributed to connected vehicle owners as rewards (part of the 45% pool above). The baseline issuance began at approximately 1,105,000 DIMO per week at network launch. This weekly reward amount decreases by 15% every 52 weeks to ensure a declining emission over time. The emission schedule is designed to span roughly 40 years, encouraging long-term participation while gradually reducing inflation. Governance may adjust the issuance parameters via community vote (DIMO Improvement Proposals), but any such changes would be transparent and subject to token-holder approval. As of now, no algorithmic "on-demand" supply adjustments are in place (supply is capped and inflation follows the predetermined decay schedule, not tied to demand levels). Prospective purchasers should carefully consider the risks (outlined in later sections) – including high volatility, technological and regulatory uncertainties – and the fact that if the DIMO platform fails or its services cease, the token's intended utility would not materialize, leaving it potentially without value. DIMO Network Limited and its affiliates do not guarantee any ongoing redemption, exchange, or minimum value for the DIMO token.
09		Only applicable if field 05 is true. Information about the quality and quantity of goods or services to which the utility tokens give access and restrictions on the transferability.	There was no public offering of DIMO tokens (no ICO/IEO); thus, no fundraising target or public subscription period applied. Instead, tokens became available to the public once they were distributed to users and early contributors, who could then trade them on secondary markets. The $DIMO token is currently admitted to trading on several cryptocurrency platforms, including centralized exchanges (e.g. Coinbase) and decentralized exchanges on the Polygon/Ethereum network (e.g. Uniswap). Trading commenced organically after the token's launch – for instance, DIMO was listed on exchanges such as Coinbase in April 2023 and Gate in February 2024, expanding public access. Prospective token holders should note that market liquidity is determined by supply and demand on these trading platforms, and there is no guarantee of active markets or price stability. Standard transaction fees (gas fees) apply when transferring DIMO on-chain, as it operates on public blockchains (Polygon, Ethereum, etc.). There are no transfer restrictions built into the token smart contract for public holders; DIMO is freely transferable on supported networks, except that certain allocated tokens (e.g. team allocations) are temporarily locked as described above.
10	Key information about the offer to the public or admission to trading	A brief and non-technical description of the offer to the public including information about the amount of the offer, including, where applicable, any minimum and maximum target subscription goals, issue price of the crypto-asset	$DIMO holders do not acquire any legal rights to profits, dividends, or assets of DIMO Network Limited, DIMO Foundation, or related entities. The token's primary purpose is functional: ● Governance: Holders can participate in community governance of the DIMO protocol. DIMO tokens enable voting on proposals (DIMO Improvement Proposals, "DIPs") that guide protocol upgrades, treasury expenditures, and ecosystem initiatives. For example, token holders have voted on proposals defining token issuance (DIP-2), data fee structures (DIP-3), and the establishment of the DIMO Foundation (DIP-6). Governance voting is typically conducted off-chain (e.g. via Snapshot), weighted by token balance, and subject to rules set in the governance guidelines. The procedure to exercise voting rights involves connecting a token holder's crypto wallet to the governance portal during active proposal voting periods; there are no minimum token requirements to vote, though

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		and subscription fees, the total number of crypto-assets to be offered; prospective holders; description, where applicable, of the various phases of the offer to the public of crypto-assets, including information on discounted purchase price for early purchasers of crypto-assets and subscription period. When applicable, the name of the crypto-asset service provider in charge of the placing of crypto-assets and the form of such placement (with or without a firm commitment basis); When applicable, a brief and non-technical description of the admission to trading, including the name of the trading platform for which the admission is sought.	higher holdings carry greater weight. These governance rights are not static – they may evolve (for instance, transitioning to on-chain voting or adjusting voting power mechanisms) through community consensus. Additionally, the community can decide to relinquish or restrict certain admin controls currently held by the DIMO Foundation (such as the ability to upgrade smart contracts), further decentralizing governance. ● Incentives and Rewards: Active participants in the DIMO ecosystem can earn DIMO tokens as rewards. Notably, vehicle owners who connect their cars and share driving data receive weekly DIMO distributions. Other community contributors – such as node operators who help store data or developers who improve the protocol – may also be incentivized with DIMO tokens. These incentives are at the discretion of the community governance and are intended to bootstrap network effects. They do not constitute an obligation of the issuer; reward programs can be modified by governance (for instance, adjusting reward formulas or schedules via new DIPs). ● Access to Services: $DIMO functions as a utility token to access current and future services in the DIMO Network. For example, developers who wish to query vehicle data from the DIMO platform must pay in DIMO (via an in-app credit system). Specifically, the network uses a stable credit unit called DCX (pegged to a fixed USD value) which developers purchase using DIMO tokens to pay for data access fees. When a developer spends DCX for data, the underlying DIMO tokens paid are burned or allocated to the treasury and node operators as per the protocol's fee distribution logic. This mechanism effectively makes DIMO a "fuel" for the ecosystem: token consumption corresponds to usage of the DIMO data services. Additionally, DIMO tokens may be required for certain actions like minting a vehicle integration NFT or device license on the network. The quantity of tokens needed for such services is determined by protocol rules (which can be adjusted via governance). ● Quality of services: Holding DIMO does not guarantee the quality or availability of any specific service; services (such as data streams, app features, or discounts) are provided "as is" by the network and third-party application providers, and may evolve or cease over time. In the event that the DIMO project fails or discontinues, the utility of the token (i.e., access to any goods/services) would be severely impaired or lost, as warned above. No Payment/Redemption Rights: $DIMO is not redeemable for fiat currency or any fixed asset by the issuer. It is not a stablecoin or asset-referenced token – its value fluctuates freely based on market dynamics. Outside of the utilities within the DIMO platform, the token has no inherent claim to exchange for any specific good or service from the issuer at a fixed rate. (Any reference to using DIMO for services refers to decentralized protocol mechanics or third-party applications, not a contractual right against DIMO Network Limited). Holders should have no expectation of any repurchase, redemption, or profit payout from DIMO Network Limited or any affiliated entity.
Part A - Information about the offeror or the person seeking admission to trading			
A.1	Name	Name	DIMO Network Limited

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
A.2	Legal form	Only applicable if a (LEI) is not provided in field A.6 Legal form	British Virgin Islands (BVI) Private Company Limited by Shares
A.3	Registered address	Only applicable if a legal entity identifier is not provided in field A.6 Address and country of registration	Floor 4, Banco Popular Building, Road Town, Tortola VG1110, British Virgin Islands
A.4	Head office	Only applicable if an LEI is not provided in field A.6 Address and country of the Head office, where different than registered address	See in field A.3
A.5	Registration date	Date of the registration	2022-10-05
A.6	Legal entity identifier	Legal entity identifier of the offeror or person seeking admission to trading, when available	Not applicable
A.7	Another identifier required pursuant to applicable national law	Field to be filled in only if a legal entity identifier is not provided in field A.6. National identifier based on the nationality of the offeror or the person seeking admission to trading, if required under the applicable national law. This field only applies to entities for which a national identifier is required in accordance with applicable national law.	BVI Company Number 2108899
A.8	Contact telephone number	Contact telephone number of the offeror or the person seeking admission to trading	+1 401-268-4624
A.9	E-mail address	E-mail address of the offeror or the person	hello@dimo.org

<table>
<tr><th>No</th><th>FIELD</th><th>CONTENT TO BE REPORTED</th><th>FORM AND STANDARDS TO BE USED FOR REPORTING</th></tr>
<tr><td></td><td></td><td>seeking admission to trading</td><td></td></tr>
<tr><td>A.10</td><td>Response time (Days)</td><td>Period of days within which an investor will receive an answer via that telephone number or e-mail address</td><td>15 days</td></tr>
<tr><td>A.11</td><td>Parent company</td><td>Field to be filled in only if a legal entity identifier is not provided in field A.6
Where applicable, the name of the parent company</td><td>DIMO Limited – the direct parent of DIMO Network Limited. The ultimate parent of the group is DIMO Foundation, a non-profit foundation entity incorporated in the Cayman Islands. DIMO Foundation oversees the project’s governance and holds certain administrative powers on behalf of the community.</td></tr>
<tr><td>A.12</td><td>Members of the management body</td><td>Identity, business address and functions of each person that is member of the management body, as defined in Article 3(1), point (27), of Regulation (EU) 2023/1114, of the offeror or the person seeking admission to trading</td><td>
<table>
<tr><th>Name</th><th>Position / Role</th><th>Affiliation</th><th>Business address</th></tr>
<tr><td>Oliver Bell</td><td>Director, DIMO Foundation</td><td>DIMO Foundation (Cayman)</td><td>Floor 4, Banco Popular Building, Road Town, Tortola VG1110, British Virgin Islands</td></tr>
<tr><td>Petrus Basson</td><td>Director, DIMO Foundation</td><td>DIMO Foundation (Cayman)</td><td>Floor 4, Banco Popular Building, Road Town, Tortola VG1110, British Virgin Islands</td></tr>
</table>
</td></tr>
<tr><td>A.13</td><td>Business activity</td><td>Business or professional activity of the offeror or person seeking admission to trading</td><td>DIMO Network Limited’s principal business is supporting the development and operation of the DIMO protocol, an open blockchain-based vehicle data network.

As the offeror of the DIMO token, DIMO Network Limited’s activities include managing token distribution, ensuring the token’s integration into the DIMO platform, and working with the parent foundation to promote ecosystem growth. DIMO Network Limited serves as an issuing entity and may engage in activities such as</td></tr>
</table>

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
			contracting with exchanges for token listings, handling certain operational funds, and holding intellectual property or licenses as needed for the project. DIMO Network Limited's principal markets are in the blockchain, automotive IoT, and software sectors – specifically enabling automotive data services and applications using crypto-assets. It does not engage in any regulated financial services beyond those related to the crypto-asset project.
A.14	Parent company business activity	Where applicable, business or professional activity of the parent company, including principal activities and principal markets	The direct parent, DIMO Limited (BVI), primarily functions as a holding company and may not have independent operations. The ultimate parent, DIMO Foundation (Cayman), is a non-profit foundation established to act on behalf of the decentralized community. The DIMO Foundation's mission is to support and grow the DIMO network while ensuring regulatory compliance and stewardship of community assets. It serves as a bridge to the traditional business world – for example, it can enter contracts, hold treasury funds, and manage IP in a way that decentralized protocols typically cannot. The DIMO Foundation holds administrative roles on certain smart contracts. It also oversees the treasury: per community authorization, the DIMO Foundation can use a portion of the treasury tokens/funds to cover operational costs, fund development, or sell tokens to strategic partners/market makers to provide liquidity. The DIMO Foundation's activities are governed by its charter and community DIPs: it must act in the best interest of the DIMO protocol, and its powers are expected to "shrink over time as DIMO matures and governance is further decentralized". In summary, the DIMO Foundation's "business" is supporting an open-source crypto project – it does not generate profits like a normal company; rather it deploys resources to foster the ecosystem (e.g. running grant programs, community initiatives, partnerships with automakers, etc.). Principal markets for the DIMO Foundation's engagement include global automotive and IoT industries (to encourage adoption of DIMO) and the blockchain industry (to integrate DIMO with other networks like Base, Polygon, Helium, etc.).
A.15	Newly established	Indication as to whether the offeror or person seeking admission to trading has been established for the past three years	true
A.16	Financial condition for the past three years	Where the offeror or person seeking admission to trading has been established for the past three years, the financial condition of the offeror or person seeking admission to trading over the past three years.	Not applicable – DIMO Network Limited does not have three full years of audited financial records. Its financial health is primarily measured by the remaining treasury and the rate of expenditure. The community governance may commission audits or publish financial reports in the future to provide a fair review of the development, performance, and position of the project as it grows.

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		This shall be assessed based on a fair review of the development and performance of the business of the offeror or person seeking admission to trading and of its position for each year and interim period for which historical financial information is required, including the causes of material changes. The review shall be a balanced and comprehensive analysis of the development and performance of the business of the offeror or person seeking admission to trading and of its position, consistent with the size and complexity of the business.	
A.17	Financial condition since registration	Where the offeror or person seeking admission to trading has not been established for the past three years, description of its financial condition since the date of its registration. This shall be assessed based on a fair review of the development and performance of the business of the offeror or person seeking admission to trading and of its position	DIMO Network Limited and DIMO Foundation are early-stage organizations in a developing protocol. Since incorporation, operations have been funded by private investments and token treasury resources, rather than revenue from product sales. The DIMO project raised initial funding through private token sales and donations. These funds have been used to finance development, research, and operational expenses. As a result, the entities have not posted traditional “profits” – expenditures have been focused on building the network and community. Because the project is not yet revenue-generating at scale (aside from small amounts of data access fees and any strategic partnerships), the financial condition is essentially that of a funded start-up / community project: it has sufficient runway (cash and token reserves) to continue operations for the near-to-mid term, but it is not cash-flow positive. The key financial events since inception include the token generation (which created the crypto-asset treasury), allocations of tokens to ecosystem development (such as the Ignite Grants program), and ongoing expenses for engineering, cloud infrastructure, hardware devices, and

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		for each year and interim period for which historical financial information is available, including the causes of material changes. The review shall be a balanced and comprehensive analysis of the development and performance of the business of the offeror or person seeking admission to trading and of its position, consistent with the size and complexity of the business.	community growth. All spending from the DIMO Foundation's treasury is approved by its directors with community oversight, ensuring funds are used for the benefit of the DIMO protocol.
		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	Indication as to whether the issuer is different from the offeror or person seeking admission to trading	Not applicable
B.2	Name	Name	Not applicable
B.3	Legal form	Field to be filled in only if an LEI is not provided in field B.7 Legal form	Not applicable
B.4	Registered address	Field to be filled in only if an LEI is not provided in field B.7 Address and country of registration	Not applicable
B.5	Head office	Field to be filled in only if an LEI is not provided in field B.7	Not applicable

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		Address of the Head office, where different than registered address	
B.6	Registration date	Date of the registration	Not applicable
B.7	Legal entity identifier	Legal entity identifier of the issuer, where available	Not applicable
B.8	Another identifier required pursuant to applicable national law	Field to be filled in only if a legal entity identifier is not provided in field B.7. National identifier based on the nationality of the issuer, if required under the applicable national law This field only applies to entities for which a national identifier is required under applicable national law	Not applicable
B.9	Parent company	Field to be filled in only if an LEI is not provided in field B.7 Where applicable, the name of the parent company	Not applicable
B.10	Members of the management body	Identity, business address and functions of each of the persons that are members of the management body, as defined in Article 3(1), point (27), of Regulation (EU) 2023/1114, of the issuer	Not applicable
B.11	Business activity	Business or professional activity of the issuer	Not applicable
B.12	Parent company business activity	Where applicable, business or professional activity of the parent company	Not applicable

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
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	Name	Not applicable
C.2	Legal form	Field to be filled in only if an LEI is not provided in field C.6 Legal form	Not applicable
C.3	Registered address	Field to be filled in only if an LEI is not provided in field C.6 Address of registration	Not applicable
C.4	Head office	Field to be filled in only if an LEI is not provided in field C.6 Address of the Head office, where different than registered address	Not applicable
C.5	Registration date	Date of the registration	Not applicable
C.6	Legal entity identifier	Legal entity identifier of the operator of the trading platform	Not applicable
C.7	Another identifier required pursuant to applicable national law	National identifier based on the nationality of the issuer, if required under the applicable national law. This field only applies to entities for which a national identifier is required under applicable national law.	Not applicable
C.8	Parent company	Field to be filled in only if an LEI is not provided in field C.6 Where applicable, the name of the parent company	Not applicable

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
C.9	Reason for crypto-Asset white paper Preparation	The reason why the operator of the trading platform drew up the crypto-asset white paper	Not applicable
C.10	Members of the Management body	Identity (name or other identifiers), business address and functions of each of the persons that are members of the management body, as defined in Article 3(1), point (27), of Regulation (EU) 2023/1114, of the operator of the trading platform	Not applicable
C.11	Operator business activity	Business or professional activity of the operator, including principal activities and principal markets	Not applicable
C.12	Parent company business activity	Where applicable, business or professional activity of the parent company, including principal activities and principal markets	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	Where different from the offeror, person seeking admission to trading, issuer, or operator of the trading platform, indication of the identity of the person drawing up the crypto-asset white paper	Not applicable
C.14	Reason for drawing the white paper by	Where the white paper is drawn up by a person different from the offeror,	Not applicable

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
	persons referred to in Article 6(1), second subparagraph, of Regulation (EU) 2023/1114	person seeking admission to trading, issuer, or operator of the trading platform, reason for drawing up the white paper	
		Part D- Information about the crypto-asset project	
D.1	Crypto-asset project name	Name of the crypto-asset project, if different from the name of the offeror or person seeking admission to trading	DIMO
D.2	Crypto-assets name	Field to be filled in only if a Digital Token Identifier (DTI) is not provided in field F.13. Name of the crypto-assets, if different from the name of the offeror or person seeking admission to trading	DIMO
D.3	Abbreviation	Field to be filled in only if a DTI is not provided in field F.13. Abbreviation or ticker handler	DIMO
D.4	Crypto-asset project description	A brief description of the crypto-asset project	DIMO is a next generation vehicle connectivity platform that is solving the automotive industry's data fragmentation challenges by creating a neutral infrastructure layer where drivers, developers, and original equipment manufacturers can all participate without ceding control or running afoul of privacy and consent requirements.
D.5	Details of all natural or legal persons involved in the implementation of the crypto-asset project	Details of advisors, development team, crypto-assets service providers and other persons involved in the implementation of the crypto-asset project, including business	Members of the Management Body: DIMO Network Limited and its parent entities are governed and advised by the following key individuals and entities (with their roles and affiliations):

<table>
<tr><th>No</th><th>FIELD</th><th>CONTENT TO BE REPORTED</th><th>FORM AND STANDARDS TO BE USED FOR REPORTING</th></tr>
<tr><td></td><td></td><td>addresses or domicile of the company</td><td>
<table>
<tr><th>Name</th><th>Position / Role</th><th>Affiliation</th></tr>
<tr><td>Oliver Bell</td><td>Director, DIMO Foundation</td><td>DIMO Foundation (Cayman)</td></tr>
<tr><td>Petrus Basson</td><td>Director, DIMO Foundation</td><td>DIMO Foundation (Cayman)</td></tr>
</table>
<u>Other notable personnel</u>: These individuals occupy key roles in helping to advise and/or support the DIMO ecosystem (with their roles and affiliations):
<table>
<tr><th>Name</th><th>Position / Role</th><th>Affiliation</th></tr>
<tr><td>Robert Solomon</td><td>Chief Executive Officer, Advisor</td><td>Digital Infrastructure Inc. (USA), a company that provides advisory and operational services to DIMO Foundation</td></tr>
<tr><td>Alex Rawitz</td><td>Chief Operating Officer, Advisor</td><td>Digital Infrastructure Inc. (USA), a company that provides advisory and operational services to DIMO Foundation</td></tr>
</table>
</td></tr>
</table>

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING			
			Yevgeny Khessin	Chief Technology Officer, Advisor	Digital Infrastructure Inc. (USA), a company that provides advisory and operational services to DIMO Foundation	
			Ryo Hayashi	CEO	DIMO Japan (Japan), a company that is partly funded by DIMO Foundation that conducts research and development and creates products and services that leverage DIMO technology	
D.6	Utility Token Classification	Indication as to whether the crypto-asset project concerns utility tokens	true			
D.7	Key Features of Goods/Services for Utility Token Projects	Where applicable, key features of the goods or services to be developed for utility tokens crypto-asset projects	The $DIMO token's functionality is to power the DIMO protocol ecosystem. It serves three primary functions: (1) Governance, allowing holders to vote on protocol decisions; (2) Network Utility, acting as the medium of exchange for certain on-platform actions (such as purchasing data access credits, registering devices, etc.); and (3) Incentivization, being distributed as a reward to participants (drivers, node operators, developers) who contribute data or work to the network. In non-technical terms, holding DIMO enables one to participate in the network's community and utilize services, while spending DIMO allows one to unlock specific data-driven applications or to compensate others for services in the DIMO ecosystem. The token contract has built-in roles for pausing and upgrading (under the control of the DIMO Foundation multisig for security governance), though these are safeguards rather than regular user-facing functions. When the token is used in the network (for instance, converted to DCX credits for data access), smart contracts will burn or redistribute those tokens according to the protocol's rules. This mechanism ties the token's utility to actual network usage – as more services are consumed, more tokens potentially get removed from circulation or allocated to contributors, aligning incentives for token holders to encourage platform adoption.			
D.8	Plans for the token	Information about the crypto-asset project, including the description of the past and future milestones	All core functionalities of $DIMO are already live or in active development: ● Governance voting is active (since 2022) via Snapshot off-chain votes; token holders have been using DIMO to propose and vote on DIMO Improvement Proposals (DIPs) that shape the network. ● Baseline reward distribution (weekly token emissions to users) began in December 2022 immediately after mainnet launch and continues on schedule, providing tokens to connected drivers.			

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
			● Data access payments (DCX credits) – this feature was introduced through DIP-3 and has been deployed in the DIMO Console for developers. As of 2024, developers can pay for vehicle data on a per-vehicle basis by purchasing DCX with DIMO, and this system is functional. We note that the initial usage is limited, but scaling up this functionality (and onboarding more data consumers) is part of the 2024–2025 growth plan. Additional functionality may be added, but is not guaranteed.
D.9	Resource allocation	Where applicable, information about resources, including financial resources, already allocated to the project	The genesis distribution allocated the supply as follows: ● 45% (450,000,000 DIMO) reserved for user rewards & airdrops to bootstrap the network. An initial airdrop was delivered to early adopters on 2022-12-12, rewarding users who connected their cars or contributed to the ecosystem (up to 67.5 million tokens were available in this airdrop). The remaining rewards are being distributed as ongoing rewards for vehicle data providers over approximately 40 years. This allocation is subject to change via governance. ● 25% (250,000,000 DIMO) allocated to the DIMO Treasury, which is controlled by the community via a DAO (DIMO Foundation) for funding development, grants, and ecosystem initiatives. Treasury tokens may be disbursed as grants or bounties to contributors, or sold in limited amounts to strategic partners/investors to raise funds for the project. Unclaimed tokens from the initial airdrop were returned to the treasury, and the treasury has conducted occasional private sales of tokens to investors, as allowed by governance. ● 30% (300,000,000 DIMO) allocated to core team members and early investors who funded and built the project. These tokens are subject to a vesting schedule: they began unlocking on 12 January 2025, with 1/36th of the allocation unlocking each month thereafter (fully unlocked by December 2027). Until unlocked, these tokens are non-transferable (locked by smart contract and/or legal agreement).
D.10	Planned use of Collected funds or crypto-Assets	Where applicable, planned use of any funds or other crypto-assets collected	Research and development, marketing, business development, and operations.
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	Indication as to whether the crypto-asset white paper concerns an offer to the public of crypto-assets or their admission to trading	ATTR
E.2	Reasons for public offer or admission to trading	The reasons for the offer to the public or for seeking admission to trading, including the planned use	As already stated in sections 10 and A.13, trading of $DIMO tokens enables wider access to the DIMO Network's services and utilities, providing users with greater liquidity and multiple acquisition channels to participate in the vehicle data ecosystem, governance activities, and reward mechanisms.

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		of the funds or other crypto assets collected	
E.3	Fundraising target	Where applicable, the amount that the offer to the public intends to raise in funds or in any other crypto-asset in an official currency or any other crypto-assets	Not applicable
E.4	Minimum subscription goals	Where applicable, minimum subscription goals set for the offer to the public of the crypto-assets in an official currency or any other crypto-assets	Not applicable
E.5	Maximum subscription goals	Where applicable, any maximum target subscription goals set for the offer to the public of the crypto-assets in an official currency or any other crypto-assets	Not applicable
E.6	Oversubscription acceptance	Indication whether oversubscriptions are accepted	Not applicable
E.7	Oversubscription allocation	Where oversubscriptions are accepted, a description of how they are allocated	Not applicable
E.8	Issue price	The issue price of the crypto-asset being offered to the public in an official currency or any other crypto-assets	Not applicable
E.9	Official currency or any other crypto-assets determining the issue price	The official currency or any other crypto-assets on the basis of which the issue price of the crypto asset is being offered to the public	Not applicable, as this white paper is written to support admission to trading and not for the initial offer to the public.

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.10	Subscription fee	Any applicable subscription fee in an official currency or any other crypto-assets	Not applicable, as this white paper is written to support admission to trading and not for the initial offer to the public.
E.11	Offer price determination method	Method in accordance with which the offer price will be determined	Once the token is admitted to trading its price will be determined by demand (buyers) and supply (sellers).
E.12	Total number of offered/traded crypto-assets	Where applicable, the total number of crypto-assets to be offered to the public or admitted to trading	Total Supply: 1,000,000,000 DIMO tokens (fixed maximum). Tokens are being released over time according to the project's tokenomics plan. Supply may decrease due to token burn or increase via minting pursuant to tokenholder governance. Initial Distribution: No ICO or public sale was conducted. Instead, the genesis distribution allocated the supply as follows: ● 45% (450,000,000 DIMO) reserved for user rewards & airdrops to bootstrap the network. An initial airdrop was delivered to early adopters on 2022-12-12, rewarding users who connected their cars or contributed to the ecosystem (up to 67.5 million tokens were available in this airdrop). The remaining rewards are being distributed as ongoing rewards for vehicle data providers over approximately 40 years. This allocation is subject to change via governance. ● 25% (250,000,000 DIMO) allocated to the DIMO Treasury, which is controlled by the community via a DAO (DIMO Foundation) for funding development, grants, and ecosystem initiatives. Treasury tokens may be disbursed as grants or bounties to contributors, or sold in limited amounts to strategic partners/investors to raise funds for the project. Unclaimed tokens from the initial airdrop were returned to the treasury, and the treasury has conducted occasional private sales of tokens to investors, as allowed by governance. ● 30% (300,000,000 DIMO) allocated to core team members and early investors who funded and built the project. These tokens are subject to a vesting schedule: they began unlocking on 12 January 2025, with 1/36th of the allocation unlocking each month thereafter (fully unlocked by December 2027). Until unlocked, these tokens are non-transferable (locked by smart contract and/or legal agreement). Token Emission & Release Schedule: In addition to the initial airdrop, $DIMO tokens enter circulation through a weekly issuance distributed to connected vehicle owners as rewards (part of the 45% pool above). The baseline issuance began at approximately 1,105,000 DIMO per week at network launch. This weekly reward amount decreases by 15% every 52 weeks to ensure a declining emission over time. The emission schedule is designed to span roughly 40 years, encouraging long-term participation while gradually reducing inflation. Governance may adjust the issuance parameters via community vote (DIMO Improvement Proposals), but any such changes would be transparent and subject to token-holder approval. As of now, no algorithmic "on-demand" supply adjustments are in place (supply is capped and inflation follows the predetermined decay schedule, not tied to demand levels).

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.13	Targeted holders	Indication of the prospective holders targeted by the offer to the public of the crypto-asset or admission of such crypto-asset to trading	ALL (all types of investors)
E.14	Holder restrictions	Indication of any restriction as regards the type of holders for such crypto-asset	The holder restrictions are primarily subject to the rules applicable to the Crypto Asset Service Provider as well as additional restrictions the Crypto Asset Service Providers might set in force. Early team members and investors are subject to a strict lock-up. The insider tokens were locked starting in 2022, with vesting only beginning in January 2025. These locked tokens then unlock gradually over 36 months, becoming fully available by December 2027. Unlocks occur on a monthly basis (roughly 1/36 of insider allotments per month) to prevent any sudden influx of supply. In parallel, tokens designated for the community's use are being emitted weekly from the baseline rewards pool to users. This long-term release schedule for both insiders and user rewards ensures a controlled, gradual increase in circulating supply.
E.15	Reimbursement notice	'Purchasers participating in the offer to the public of crypto-asset will be able to be reimbursed if the minimum target subscription goal is not reached at the end of the offer to the public, if they exercise the right to withdrawal provided for in Article 13 of Regulation (EU) 2023/1114 of the European Parliament and of the Council or if the offer is cancelled'	Not applicable
E.16	Refund mechanism	Detailed description of the refund mechanism	Not applicable
E.17	Refund timeline	Expected timeline of when the refunds will be completed	Not applicable
E.18	Offer phases	Information about the various phases of the offer	Not applicable

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
		to the public of the crypto-asset	
E.19	Early purchase discount	Information on discounted purchase price for early purchasers of the crypto-asset - (pre-public sales) and in the case of discounted purchase price for some purchasers, an explanation as to why the purchase prices may be different and a description of the impact on the other investors	Not applicable
E.20	Time-limited offer	Indication whether the offer is time-limited	Not applicable
E.21	Subscription period beginning	For time-limited offers, the beginning of the subscription period during which the offer to the public is open	Not applicable
E.22	Subscription period end	For time-limited offers, the end of the subscription period during which the offer to the public is open	Not applicable
E.23	Safeguarding arrangements for offered funds/crypto-Assets	The arrangements to safeguard funds or other crypto-assets as referred to in Article 10 of Regulation (EU) 2023/1114 during the time-limited offer to the public or during the withdrawal period	Not applicable
E.24	Payment methods for crypto-asset purchase	Methods of payment to purchase the crypto-assets	The payment methods are subject to the respective capabilities of the Crypto Asset Service Provider listing the crypto-asset.

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.25	Value transfer methods for reimbursement	Methods of transfer of the value to the purchasers when they are entitled to be reimbursed	Not applicable
E.26	Right of withdrawal	In the case of offers to the public , information on the right of withdrawal as referred to in Article 13 of Regulation (EU) 2023/1114	Not applicable, as this white paper is written to support admission to trading and not for the initial offer to the public.
E.27	Transfer of purchased crypto-assets	Manner of transferring purchased crypto-assets to the holders	The transfer of purchased crypto-assets are subject to the respective capabilities of the Crypto Asset Service Provider listing the crypto-asset.
E.28	Transfer time schedule	Time schedule of transferring purchased crypto-assets to the holders	Not applicable, as this white paper is written to support admission to trading and not for the initial offer to the public.
E.29	Purchaser's technical requirements	Information about technical requirements that the purchaser is required to fulfil to hold the crypto-assets	All holders must secure and retain access to a compatible cryptocurrency wallet. The technical requirements that the purchaser is required to fulfil to hold the crypto-assets of purchased crypto-assets are subject to the respective capabilities of the Crypto Asset Service Provider listing the crypto-asset.
E.30	Crypto-asset service provider (CASP) name	Where applicable, the name of the crypto-asset service provider (CASP) in charge of the placing of crypto-assets	Not applicable
E.31	CASP identifier	The legal entity identifier of the crypto-asset service provider in charge of the placing of crypto-assets	Not applicable
E.32	Placement form	Where applicable, the form of the placement	NTAV
E.33	Trading platforms name	Where applicable, the name of the trading platforms for crypto-assets where admission to trading is sought	Trading on relevant MiCAR-compliant trading platforms is sought, such as Coinbase.

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
E.34	Trading platforms Market identifier code (MIC)	Segment MIC for the trading platform where the admission to trading of the crypto-assets is sought.	Not applicable
E.35	Trading platforms access	Where applicable, information about how investors can access the trading platforms	This depends on the trading platform listing the asset.
E.36	Involved costs	Where applicable, information about the costs involved in relation to the access of investors to the trading platforms	This depends on the trading platform listing the asset. Furthermore, costs may occur for making transfers out of the platform (i.e. "gas costs" for blockchain network use that may exceed the value of the crypto-asset itself).
E.37	Offer expenses	Expenses related to the offer to the public of crypto-assets, in an official currency or any other crypto-assets. If more than one type of offer expense, expenses should be presented in a tabular format	Not applicable, as this crypto-asset white paper concerns the admission to trading and not the offer of the token to the public.
E.38	Conflicts of interest	Potential conflicts of interest of the persons involved in the offer to the public or admission to trading, arising in relation to the offer or admission to trading	MiCAR-compliant Crypto Asset Service Providers shall have strong measurements in place in order to manage conflicts of interests. Due to the broad audience this white-paper is addressing, potential investors should always check the conflicts of Interest policy of their respective counterparty.
E.39	Applicable law	The law applicable to the offer to the public of the crypto-asset	Not applicable, as this crypto-asset white paper concerns the admission to trading and not the offer of the token to the public.
E.40	Competent court	Competent court	Not applicable, as this crypto-asset white paper concerns the admission to trading and not the offer of the token to the public.
Part F - Information about the crypto-assets			

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
F.1	Crypto-asset type	The type of crypto-asset that will be offered to the public or for which admission to trading is sought	Utility Token – $DIMO is classified as a utility crypto-asset (falling under the “other crypto-assets” category in MiCA, as it is neither an asset-referenced token nor an e-money token). It is intended for use within a blockchain-based platform (the DIMO vehicle data network) and is not pegged to any currency or asset.
F.2	Crypto-asset functionality	A description of the functionality of the crypto-assets being offered or admitted to trading	The $DIMO token's functionality is to power the DIMO protocol ecosystem. It serves three primary functions: (1) Governance - Token holders can participate in protocol decision-making through on-chain voting. This includes decisions about: • Protocol parameter adjustments (e.g., reward distribution rates, fee structures) • Treasury allocation for grants and ecosystem development • Approval of new device manufacturers and data integrators • Updates to the protocol's technical architecture • Community proposals for new features or partnerships The voting power is proportional to token holdings, with proposals typically requiring a minimum quorum and majority approval to pass. (2) Network Utility - The token acts as the primary medium of exchange within the ecosystem for: • Data Access Credits (DCX): Users burn DIMO tokens to mint DCX, which are then used to query vehicle data through the network • Device Registration: Manufacturers and users pay DIMO to register new devices (OBD dongles, software connections) on the network • Developer Applications: Apps built on DIMO may require token payments for premium features or API access • Marketplace Transactions: Future implementations may include peer-to-peer data sales, insurance products, or vehicle services, all denominated in DIMO • Name Registration: Similar to ENS, users can claim custom identifiers for their vehicles or accounts (3) Incentivization - The protocol distributes tokens to various network participants: • Drivers/Vehicle Owners: Earn baseline rewards for connecting vehicles and sharing data, with bonus rewards for data quality, consistency, and rare vehicle types • Node Operators: Receive tokens for running infrastructure that validates and stores network data • Developers: Earn through grants, bounties, and revenue sharing from applications they build

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
			• Data Consumers: May receive rebates or rewards for consistent platform usage • Referrers: Community members who onboard new users can earn referral rewards Real-World Use Cases: • An insurance company burns 1,000 DIMO to mint DCX credits, then uses those credits to query anonymized driving behavior data for risk modeling • A vehicle owner earns 50 DIMO monthly for sharing their Tesla's data, then uses 20 DIMO to register a second vehicle • A developer building a parking app stakes DIMO to access real-time location APIs and shares revenue with the protocol • A fleet management company uses DIMO to access comprehensive vehicle health data across their entire fleet This token design creates a flywheel effect: as more services are consumed, tokens are removed from circulation or redistributed to contributors, creating scarcity while rewarding participation. The alignment ensures token holders are incentivized to drive adoption, developers are motivated to build useful applications, and data providers are compensated fairly for their contributions to the network.
F.3	Planned application of functionalities	Information about when the functionalities of the crypto-assets being offered or admitted to trading are planned to apply	All core functionalities of $DIMO are already live or in active development as of this writing: ● Governance voting is active (since 2022) via Snapshot off-chain votes; token holders have been using DIMO to propose and vote on DIMO Improvement Proposals (DIPs) that shape the network. ● Baseline reward distribution (weekly token emissions to users) began in December 2022 immediately after mainnet launch and continues on schedule, providing tokens to connected drivers. ● Data access payments (DCX credits) – this feature was introduced through DIP-3 and has been deployed in the DIMO Console for developers. As of 2024, developers can pay for vehicle data on a per-vehicle basis by purchasing DCX with DIMO, and this system is functional. We note that the initial usage is limited, but scaling up this functionality (and onboarding more data consumers) is part of the 2024–2025 growth plan. Additional functionality may be added, but is not guaranteed.
A description of the characteristics of the crypto-asset, including the data necessary for classification of the crypto-asset white paper in the register referred to in Article 109 of Regulation (EU) 2023/1114, as specified in accordance with paragraph 8 of that Article			
F.4	Type of crypto-asset white paper	The type of white paper notified	OTHR
F.5	The type of submission	Type of submission	NEWT

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
F.6	Crypto-asset characteristics	A description of the characteristics of the crypto-asset	General description: DIMO is a fungible, freely transferable digital token implemented as a smart contract on public blockchains. It conforms to the ERC-20 token standard, ensuring compatibility with the broad Ethereum ecosystem (wallets, exchanges, etc.). Not a Stable Value Token: DIMO's price on the market fluctuates; it is not designed to maintain any peg or minimum value. No value-protection mechanism (such as a buy-back fund or collateral reserve) exists. No Embedded Derivatives: The token does not entitle holders to any derivative-like payoff, nor is it backed by commodities or other assets. It is purely a native asset of the DIMO protocol.
F.7	Commercial name or trading name	Field to be filled in only if a DTI is not provided in field F.13. Commercial name or trading name of the issuer.	DIMO
F.8	Website of the issuer	Website of the issuer	https://dimo.org
F.9	Starting date of offer to the public or admission to trading	Starting date or, if not available at the time of the notification by the competent authority, the intended starting date of offer to the public or admission to trading.	2025-07-10
F.10	Publication date	Effective or intended publication date of the crypto-asset white paper or of the modified white paper	2025-07-10
F.11	Any other services provided by the issuer	Any other services provided by the issuer not covered by Regulation (EU) 2023/1114, with a reference to the applicable Union or national legal acts regulating those services	The broader DIMO project does involve offering technology services: e.g., the DIMO mobile app and console through which users connect their cars and developers access data. These are services provided to users of the platform, but they are outside the scope of Regulation (EU) 2023/1114. These services can be described as IoT/data services. DIMO Network Limited and DIMO Foundation also engage in community-building activities (hosting hackathons, granting development funds, etc.). None of these constitute services that would require an authorization under EU financial or e-money regulations.
F.12	Language or languages of the	Language or languages in which the crypto-asset white paper is drafted	English

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
	crypto-asset white paper	When multiple languages have been used, this field shall be reported as many times as necessary	
F.13	Digital token identifier code used to uniquely identify the crypto-asset or each of the several crypto assets to which the white paper relates, where available	Code used to uniquely identify the crypto-asset or each of the several crypto assets to which the crypto-asset white paper relates, where available	Not applicable
F.14	Functionally fungible group digital token identifier, where available	Code used to uniquely identify the functionally fungible group to which the digital asset belongs (i.e., common to each of the several assets to which the white paper relates, i.e. Code used to identify the white paper ISO 24165 DTI of type = 3 (i.e., functionally fungible group), where available	Not applicable
F.15	Voluntary data flag	Flag indicating the mandatory or voluntary nature of the crypto-asset white paper provided for in Article 4(8) of Regulation (EU) 2023/1114	false
F.16	Personal data flag	Flag indicating if the submitted white paper contains personal data	true

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
F.17	LEI eligibility	Indication that the issuer is eligible for a Legal Entity Identifier	true
F.18	Home Member State	Home Member State as defined in Article 3(1), point (33), of Regulation (EU) 2023/1114	Ireland
F.19	Host Member States	Host Member State as defined in Article 3(1), point (34), of Regulation (EU) 2023/1114	Austria Belgium Bulgaria Croatia Cyprus Czech Republic Denmark Estonia Finland France Germany Greece Hungary Iceland Ireland Italy Latvia Liechtenstein Luxembourg Malta Netherlands Norway Poland Portugal Romania Slovakia Slovenia Spain Sweden
Part G - Information on the rights and obligations attached to the crypto-assets			

No	FIELD	CONTENT TO BE REPORTED	FORM AND STANDARDS TO BE USED FOR REPORTING
G.1	Purchaser rights and obligations	A description of the rights and obligations, if any, of the purchaser	Holders of DIMO tokens are not entitled to traditional financial rights, but they do gain certain functional rights within the DIMO network, as detailed below. Correspondingly, holding the token imposes no mandatory obligations on holders beyond respecting the network's terms of use. • Governance and Voting Rights: Every DIMO token gives its holder a proportional voice in the DIMO governance process. This is a voluntary right – holders can choose to participate (vote on proposals, make proposals) but are not obliged to. There is no one-token-one-vote board; rather, votes are weighted by token balance (generally snapshot of holdings at a proposal's record date). These governance votes can influence network parameters (issuance rate, fee models, grant allocations) as well as community decisions like electing delegates or approving major partnerships. *This is a right to influence, not a guarantee of outcome* – only if a holder's view is shared by enough of the community will a vote pass. Importantly, this right is collective; a single holder cannot unilaterally change anything by virtue of holding tokens, but collectively, token holders are the decision-making body for the decentralized protocol (aside from certain limited powers temporarily held by the foundation, which are subject to the community's oversight). • Access and Utility Rights: Holding DIMO is akin to holding a "membership token" in the DIMO ecosystem. It gives the holder the ability to utilize DIMO in transactions to access data or services. For example, a developer with DIMO tokens has the right to convert those tokens into DCX credits (via the console app) to retrieve vehicle data from users who have consented. A vehicle owner with DIMO can use it within the app to possibly unlock premium features or stake in community initiatives (e.g., staking for a manufacturer license to provide hardware). These are not enforceable rights against the issuer, but protocol-enabled capabilities: if you have DIMO, the smart contracts will allow you to perform these actions that someone without DIMO cannot. Additionally, DIMO holders can claim available rewards if they meet criteria (e.g., if you connect a car, you have the right to claim your share of the weekly token reward, which you can then hold or sell). If governance introduces new utility (say, requiring DIMO to vote or to use a new feature), holders inherently gain that new right with their tokens. • Economic and Proprietary Rights: DIMO holders do not have ownership rights in any company, nor rights to any assets of the project. They do not have a right to reclaim their money or to demand any form of dividend or interest. The token is not debt; there is no repayment. Holders have no legal claim to the data in the network either – vehicle data remains owned by the vehicle owners (users) who share it; the token does not confer ownership of data. DIMO does not entitle one to any license fees or revenue share from the network's operations. If the DIMO Foundation generates revenue (for instance, from selling devices or enterprise partnerships), token holders have no automatic claim on those revenues (though governance could vote to use some revenue to buy back or burn tokens, but that would be a discretionary decision, not an obligation). • Obligations: Simply holding DIMO imposes no action on the holder. They are not required to participate in governance or use the tokens in any way. However, by using the tokens on the platform, holders implicitly agree to the platform's terms (e.g., a developer using DIMO to access data must agree to not

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			misuse that data and to abide by user privacy consents; a user earning DIMO agrees not to game the system fraudulently, etc.). These obligations are typically covered in the DIMO app user agreement, or the developer license terms, rather than the token itself. Another practical obligation: token holders must manage their own wallets and private keys securely; losing access to one's wallet means losing access to the tokens (the issuer has no obligation or ability to restore lost tokens). • No Redemption or Refund Right: As noted, purchasers cannot demand the offeror or any entity to redeem their DIMO for fiat or other assets. There is no guaranteed exit; selling via the market is the only way to liquidate tokens, subject to market conditions. • No Voting Rights in Legal Entities: Owning DIMO does not make one a shareholder of DIMO Network Ltd or any affiliate. Thus, token holders do not vote in company meetings or elect the board of the foundation directly (though major foundation actions are often guided by token votes informally). • Right to Information: Beyond this white paper, token holders will receive ongoing disclosures via the project's communication channels (blog, governance forum, etc.). While not a formal "right" as in stock ownership, the DIMO community values transparency – for example, publishing smart contract audits and regular project updates. Holders can reasonably expect the issuer to update material information (especially if it might affect token utility or risk). • Intellectual Property and Data: Holding a token does not grant rights to the project's intellectual property (like the software code, brand, etc.), which are usually open-source or owned by the foundation with permissive licenses to the community. It also does not give rights to personal data; all personal/vehicle data in DIMO is controlled by the users who contributed it, not token holders at large. In summary, the rights of DIMO purchasers are network-native rights: to use, vote, and earn within the DIMO platform. These rights are not absolute and can be exercised only in accordance with the protocol rules and smart contract capabilities. If the holder chooses not to engage with the network, the token simply remains an asset they can hold or trade. If the platform ceases to exist, these rights may discontinue.
G.2	Exercise of rights and obligations	Procedure and conditions for the exercise of rights	The procedures and conditions for exercising the above rights are as follows: • Governance Participation: To vote on proposals, a holder typically needs to connect their crypto wallet (that holds DIMO) to the DIMO governance portal (such as a Snapshot page or similar voting interface). Votes are usually free of on-chain transaction fees because they are taken off-chain with cryptographic signature verification of token balances. The only condition is that the token must be delegated using the on-chain delegation call to a wallet and then that wallet must connect and vote. If a holder transfers their tokens away before the snapshot (or acquires after snapshot), they cannot vote on that particular proposal. Proposal creation may require a certain minimum holding or backing by other holders (for instance, a community rule might say a proposal needs X number of tokens supporting it to be formally considered). These governance processes are defined in the DIMO Governance Guidelines (DIP-1)

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			found at https://docs.dimo.org/governance and are subject to change by community consensus. In general, exercising voting rights is voluntary and there is no penalty for not voting. Votes are counted and results are posted transparently. Implementation of an approved vote (e.g., code upgrade) may be carried out by the foundation or core devs after the vote – so the effect of the vote might not be immediate until executed. • Using DIMO for Services: To utilize DIMO tokens for data or services, the holder will typically use official DIMO applications: o For data access (developers): The developer registers on the DIMO Console (web app), where they can buy DCX credits. Under the hood, the console will prompt the developer to send a certain amount of DIMO from their wallet to the DCX contract (or the console might accept fiat and convert to DIMO behind the scenes). Once the DIMO is provided (spent), the developer's account is credited with DCX which can be used to query data via API. This process may also be abstracted for the developer so they can pay with more convenient methods and have the DIMO purchased and converted in the background. Conditions include compliance with data licensing terms (they must agree not to misuse data, etc.). If the developer fails to pay (i.e., doesn't provide DIMO), they simply cannot access more data – there's no further obligation, except that if they have an ongoing subscription, lack of payment will cut off service. o For earning rewards (drivers): A user must download an app like the DIMO Mobile App, create an account (wallet), and connect a car through either an approved hardware device or a software connection to the car's OEM API. They also must mint their car as a DIMO Vehicle NFT. Once set up, the vehicle will start streaming data and the user accumulates points. Every week, the protocol (via a smart contract or off-chain calculation) determines the reward distribution and sends DIMO tokens to eligible user wallets. To actually claim the tokens, the user might need to open the app; presently, distributions are automated to user wallets on Polygon. Conditions for this include: the vehicle must remain connected and in compliance (e.g., not sending fake data. There is also a condition that the foundation can withhold tokens from addresses flagged for compliance issues (e.g., sanctions), meaning if a user's wallet is on an OFAC sanctions list, the distribution can be blocked. o Transferring and Trading: To transfer DIMO to someone or to an exchange, the holder uses a compatible crypto wallet (MetaMask, etc.) or in-app wallet and initiates a standard ERC-20 transfer to the recipient's address. The only conditions are having sufficient balance and paying the network gas fee. There are no project-imposed limits on transfers (no whitelist or lockup, except for vesting contracts on team tokens which are automated). o Device licensing: If a hardware manufacturer wants to produce DIMO-compatible devices, they need to obtain a license NFT by staking a certain amount of DIMO as per governance rules. The process is set by License Proposals (DLPs). For example, DLP-3 details Digital Infrastructure Inc.'s node operations and might include a requirement to hold DIMO. These specialized use-cases require interacting with specific smart contracts and are typically one-time or infrequent actions.

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			○ Conditions for Network Participation: All interactions require adherence to the DIMO Network Terms of Service (for app users) and possibly data processing agreements (for developers accessing data). These terms are accessible through DIMO's app and websites. They include clauses on user behavior, data consent, and disclaimers. By exercising their token's utility (connecting a car, retrieving data, etc.), users implicitly agree to those terms. Non-compliance (e.g., misusing personal data or attempting to cheat the rewards system) can result in loss of access or disqualification from rewards, as determined by the community or the foundation's enforcement of rules. ○ Upgrades and Changes: If any rights or procedures change (say, the community votes to require on-chain voting, which would mean token holders must then pay gas to vote), the foundation will give notice and update documentation. Token holders should stay informed via official channels to know how to continue exercising their rights under new conditions. In essence, exercising rights in the DIMO ecosystem is straightforward for users familiar with blockchain applications: use your wallet to vote or transact, use the DIMO app to connect devices or access services, and follow the instructions given by the DIMO platform. If any step requires assistance, the DIMO team provides support channels (Discord, documentation) to guide token holders. There are no onerous conditions like approval from the issuer needed for typical use – everything is meant to be permissionless and automated via smart contracts, except where anti-abuse or compliance filters are in place for legal reasons.
G.3	Conditions for modifications of rights and obligations	Description of the conditions under which the rights and obligations may be modified	The rights and obligations attached to DIMO tokens can potentially be modified under certain circumstances: • Through Governance Decisions: As noted, the community of token holders has the power to change how the token functions in the ecosystem. For instance, governance could propose a change to the reward algorithm (affecting how new tokens are distributed to holders vs. users), or could decide to discontinue a particular utility feature if it's not working. Any such modification would follow the governance process: proposal, discussion, vote, and then implementation. The condition here is that a sufficient majority (and any quorum requirements) of token holders agree to the change. Thus, rights can be expanded or limited by collective action. For example, if a future DIP proposed that holding a minimum amount of DIMO is required to propose a new governance vote (thus adding a new obligation for would-be proposers), that would be debated and if passed, it modifies the de facto rights (introducing a threshold to exercise proposal rights). Another example: governance might vote to divert a portion of all token transfer fees (if any were introduced) to the treasury – currently there are no transfer fees, but if introduced, that imposes a new obligation (small fee) on token transfers. So far, no such changes have been made; any major change would likely be accompanied by an updated white paper or addendum. • By Contract Upgrade or Fork: The DIMO Foundation, as contract admin, could upgrade the token contract to fix bugs or improve it. An upgrade could theoretically change token features (for instance, removing the pause function or adding a new role for governance directly). The foundation has committed that any non-emergency upgrade will be aligned with governance approval. In an extreme scenario where the community distrusts the foundation's control, the community could also decide to "hard fork" the token – essentially deploy a new token contract and migrate to it via governance/social consensus,

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			thus altering rights (this is hypothetical and undesired, and would only occur if something went very wrong with the current contract). • Legal/Regulatory Intervention: If regulators or courts mandate changes (e.g., if certain rights are deemed to make the token a regulated instrument, the project might remove or adjust those features to maintain compliance), this could alter holders' practical rights. For instance, if by law the token had to disallow usage in a certain jurisdiction, the contract might be upgraded to include geo-blocking or blacklisting of certain addresses. While currently not the case, token holders should be aware that compliance with law can override some decentralized ideals. The project will strive to minimize impact on holders and will be transparent about any such modifications required by law. • Technical Evolution: Over time, parts of the DIMO ecosystem might migrate to new technologies (e.g., moving a service off-chain or to a different chain). This can change how rights are exercised. For example, if in the future DIMO governance moves on-chain fully, token holders might need to lock their tokens in a voting contract (staking to vote) rather than just signing messages. That modifies the procedure and potentially ties up tokens for a period (an added condition to exercise voting right). Such changes would be voluntary (holders choose to stake to vote) but represent a modification in how rights work. • No Unilateral Revocation: The issuer cannot unilaterally revoke tokens or strip holders of their fundamental rights to transfer or hold. Even the pause function is temporary and for emergencies – it doesn't permanently remove rights, it would at most freeze transfers until an issue is resolved. The issuer has no ability to confiscate tokens (except if a court ordered specific illegal addresses to be blacklisted, which is not currently in place; and even then, the token contract does not have a blacklist feature built-in at this time). The project's ethos is decentralization, so any modification that significantly impacts holders would be community-driven. • Contractual vs. Protocol Distinction: Note that many "rights" are not contractual promises but protocol features (e.g., the right to earn rewards is not a contractual obligation of the issuer, it's a protocol programmed to distribute tokens). To "modify" that, one would upgrade the protocol. So modifications to those features follow the above mechanisms (governance, upgrades). There is no scenario where, for example, the issuer decides to stop giving rewards and holders can claim breach of contract – instead, it would be a community decision to reallocate rewards. • Notice of Modifications: The issuer (DIMO Foundation/Network) commits to informing token holders of any material changes to rights or obligations via official channels (website, documentation updates, and regulatory filings). This white paper would be updated or supplemented if needed (in line with MiCA Article 10 on changes requiring an update). For example, if a new version of the token contract is deployed or a new chain is adopted, an updated white paper section would describe the changes. In short, conditions under which rights/obligations may change are transparent and involve the token holders themselves. There is no hidden mechanism to alter what a DIMO token can do; changes come from community governance or necessary technical/legal adjustments, all of which would be openly

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			communicated. Token holders should remain engaged with the community to participate in or at least be aware of any such changes.
G.4	Future public offers	Where applicable, information on the future offers to the public of crypto-assets by the issuer	Not applicable
G.5	Issuer retained crypto-assets	Where applicable, information on the number of crypto-assets retained by the issuer itself	The crypto-assets retained by the issuer may be found in the wallets listed at https://docs.dimo.org/foundation/wallets
G.6	Utility token classification	Indication as to whether the offer to the public of crypto-assets or their admission to trading concerns utility tokens	true
G.7	Key features of goods/services of utility tokens	Information about the quality and quantity of goods or services to which the utility tokens give access	The DIMO project's goods and services revolve around vehicle data and mobility applications. DIMO enables car owners to collect and share telemetry data (e.g., location, speed, battery level, diagnostic codes) from their vehicles using either an after-market hardware device or integrated APIs. This data is made available (with user permission) to service providers and developers. The $DIMO token gives developers a means to access this data (via purchase of DCX credits as described). In essence, one key "service" is a data marketplace: DIMO tokens unlock streams of high-quality vehicle data that can be used to build apps or conduct analytics. DIMO tokens essentially facilitate a consent-based data exchange rather than an outright sale of personal data.
G.8	Utility tokens redemption	Only applicable if field G.6 is true. Information on how utility tokens can be redeemed for goods or services to which they relate	It gives the holder the ability to utilize DIMO in transactions to access data or services. For example, a developer with DIMO tokens has the right to convert those tokens into DCX credits (via the console app) to retrieve vehicle data from users who have consented. A vehicle owner with DIMO can use it within the app to possibly unlock premium features or stake in community initiatives (e.g., staking for a manufacturer license to provide hardware). These are not enforceable rights against the issuer, but protocol-enabled capabilities: if you have DIMO, the smart contracts will allow you to perform these actions that someone without DIMO cannot. Additionally, DIMO holders can claim available rewards if they meet criteria (e.g., if you connect a car, you have the right to claim your share of the weekly token reward, which you can then hold or sell). If governance introduces new utility (say, requiring DIMO to vote or to use a new feature), holders inherently gain that new right with their tokens.
G.9	Non-trading request	Indication whether an admission to trading is sought	true

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G.10	Crypto-assets purchase or sale modalities	Where an admission to trading is not sought, information on how and where the crypto-assets can be purchased or sold after the offer to the public	Not applicable, as the admission to trading of the tokens is sought
G.11	Crypto-assets transfer restrictions	Restrictions on the transferability of the crypto-assets that are being offered or admitted to trading	The crypto-assets as such do not have any transfer restrictions and are generally freely transferable. The Crypto Asset Service Providers can impose their own restrictions in agreements they enter with their clients. The Crypto Asset Service Providers may impose restrictions to buyers and sellers in accordance with applicable laws and internal policies and terms.
G.12	Supply adjustment protocols	Indication as to whether the crypto-asset has protocols for the increase or decrease of its supply in response to changes in demand	true
G.13	Supply adjustment mechanisms	Where the crypto-asset has protocols for the increase or decrease of its supply in response to changes in demand, a description of the functioning of such protocols	Tokens may be burned by any holder. The token holders may vote to “mint” new tokens and increase the supply per the token voting governance procedures.
G.14	Token value protection schemes	Indication as to whether the crypto-asset has a protection scheme protecting the value of the crypto-asset	false
G.15	Token value protection schemes description	Where the field G.14 is true, a description of the protection schemes protecting the value of the crypto-assets	Not applicable
G.16	Compensation schemes	Indication as to whether the crypto-asset has a compensation scheme	false

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G.17	Compensation schemes description	Where the field G.16 is true, a description of the compensation schemes	Not applicable
G.18	Applicable law	The law applicable to the crypto-assets	Applicable law likely depends on the location of any particular transaction with the token. DIMO, whose protocol is an open blockchain-based vehicle data network, operates in a decentralized manner with no central issuing entity, making it likely subject to the regulatory frameworks of the jurisdictions where it is traded or utilized. The applicable laws governing DIMO transactions, trading, and compliance depend on the legal requirements of each country, including the EU Markets in Crypto-Assets Regulation (MiCA), anti-money laundering (AML) laws, and securities regulations, where applicable.
G.19	Competent court	Competent court	Competent court likely depends on the location of any particular transaction with the token. As DIMO, whose protocol is an open blockchain-based vehicle data network, operates in a decentralized manner with no central issuer or governing entity, it does not fall under the jurisdiction of any specific legal framework.
		Part H – information on the underlying technology	
H.1	Distributed ledger technology (DTL)	Field to be filled in only if a DTI is not provided in field F.13. Information on the technology used, including distributed ledger technology	The DIMO token utilizes existing public distributed ledger technologies – primarily the Polygon network (an EVM-compatible blockchain), as well as Ethereum, Base, and Solana (for bridging and certain exchange transactions).
H.2	Protocols and technical standards	Information about protocols and technical standards used	The DIMO project uses a range of established protocols and standards: • ERC-20: The token follows the Ethereum Request for Comments 20 standard for fungible tokens. This guarantees interoperability with wallets, exchanges, and DeFi protocols that support ERC-20 tokens. • ERC-721: Non-fungible tokens for vehicle identities adhere to ERC-721 (or possibly the newer ERC-1155 for efficiency, but likely 721 for unique assets). This standard defines how NFTs are represented and transferred, enabling integration with NFT marketplaces and tools. • OpenZeppelin Libraries: The smart contracts leverage OpenZeppelin's standard libraries for security and functionality. • Snapshot (off-chain voting): Governance uses Snapshot.org, a standard off-chain voting protocol where token balances are queried via strategies (like reading from Polygon at a certain block) and votes are signed by holders. It's widely used in DeFi governance for gasless voting. • Discord and Forums: Community coordination happens via platforms like Discord (with bots and tools typical to crypto communities) and Discourse forums for DIP discussions.

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			• Data Standards: For data itself, DIMO defines standard schemas for vehicle data (e.g., using automotive industry standard signals where possible, possibly aligning with Motion OBD-II PIDs or Bluetooth CAN data). Also, DIMO might align with AAC (Automotive Augmented Certification) or other emerging standards for vehicle digital twins – not sure if any formal one is used, but they maintain a Data Dictionary for signals. • Device Communication: DIMO hardware uses established IoT protocols (likely BLE to connect to phone, or LoRaWAN to send data to Helium network, etc.). Helium network in turn uses a standard for LoRa device communication and an on-chain integration with Solana. • Security Standards: The DIMO team has conducted security audits (SigmaPrime, Sayfer) to ensure contracts meet security standards. They also implement best practices like multi-sig wallets (Gnosis Safe) for admin control and time-locks on critical functions (so that any contract upgrade or large token movement has a delay to alert community). • API Standards: The DIMO developer API likely uses REST/GraphQL endpoints with standard authentication (OAuth or API keys tied to DCX credits). Not a blockchain standard per se, but relevant for how developers use the data after paying. • Decentralized Identity (DID): Although not explicitly mentioned, by giving each vehicle an NFT, DIMO essentially provides a decentralized identity. They could incorporate W3C DID standards in the future for vehicle identities, but currently the NFT approach is simpler. Overall, DIMO builds on open standards to ensure compatibility and openness. They intentionally chose Polygon/Ethereum tech stack for its mature standards and tools. The benefit is developers can easily work with DIMO using familiar Ethereum tooling (Solidity, web3 libraries). Additionally, aligning with standards like ERC-20 means that in the future, if DIMO integrates into DeFi or cross-chain ecosystems, it meets the expected technical criteria.
H.3	Technology used	Other information on the technology used	DIMO uses cloud services (like AWS, etc.) for parts of its platform (the DIMO Console and user data storage). There is a node software component: users run a “DIMO Node” (either via a physical DIMO Miner device or a software connector) which collects data and forwards it. These nodes currently rely on centralized services for data ingestion, but over time could become more decentralized.
H.4	Consensus mechanism	Information on the consensus mechanism, where applicable	The consensus mechanisms at play for the DIMO token are those of the underlying blockchains: • Polygon PoS: Polygon’s consensus mechanism is a Proof-of-Stake sidechain. Validators stake Polygon’s native token (MATIC) and produce blocks in a round-robin fashion, with a committee periodically checkpointing the state to Ethereum for finality. Block times on Polygon are ~2 seconds, and it achieves high throughput. The security relies on the honesty of 2/3 of the validators by stake. Since it’s a permissionless validator set (with lots of participants), it’s considered reasonably secure for the scale of assets on it, though not as secure as Ethereum mainnet. For DIMO’s purposes, Polygon’s consensus has been sufficient and has functioned without major incident to date. Polygon also benefits from being one of the most widely adopted Ethereum scaling solutions, which means its consensus and infrastructure are robust and well-reviewed

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			• Ethereum Proof-of-Stake: Ethereum switched to PoS in September 2022 (“The Merge”). It uses a consensus mechanism known as Casper (Gasper) which is a hybrid of PoS and finality gadget. Validators lock up 32 ETH each to become validators. Blocks are proposed and attested in slots (~12 seconds each) and epochs finalize every ~6.4 minutes with supermajority attestations. Security assumptions: as long as >66% of staked ETH (by value) behaves honestly, the chain is secure. Ethereum’s PoS is one of the most secure consensus systems currently, given the amount staked and its decentralization. When DIMO tokens are on Ethereum (either locked in the bridge or being transacted on exchange), they fully inherit Ethereum’s security. That’s a strong point: any large value transfers (like exchange cold storage) likely rely on Ethereum’s deep security. • Base (Optimism Rollup): Base’s consensus piggybacks on Ethereum. Base itself uses Optimistic Rollup, which doesn’t have a separate consensus – it assumes transactions are correct and only if there’s fraud, someone can submit a proof to Ethereum. In essence, as long as at least one honest observer is watching Base, any fraud can be caught in a 7-day window. The transactions on Base are sequenced by a centralized sequencer (Coinbase initially), but they plan to decentralize that eventually. In the interim, one trusts Coinbase not to censor or rewrite transactions (and even if they did, users could exit because the state is anchored to Ethereum). So Base’s security comes from Ethereum’s consensus plus the honesty of watchers. • Solana: Solana uses a Proof-of-Stake with a unique Proof-of-History component to order transactions. It has very fast block times (~400ms) and high throughput. It requires a majority of stake to be honest as well. Solana is more centralized in validators (over 1,700 validators, but a lot of stake is concentrated). For Helium’s use (IoT data micropayments), it’s suitable.
H.5	Incentive mechanisms and applicable fees	Information on incentive mechanisms to secure transactions and any fees applicable	Validators earn rewards (new issuance + priority fees) for proposing/attesting blocks. This incentivizes them to act honestly. If they deviate (e.g., sign conflicting blocks), they get slashed. Thus, security is economically enforced by staking incentives.
H.6	Use of distributed ledger technology	Indication as to whether the crypto-assets are issued, transferred and stored using distributed ledger technology that is operated by the issuer, the offeror or a third-party acting on their behalf	false
H.7	DLT functionality description	If the DLT is operated by the issuer or a third party acting on the issuer’s behalf, a detailed description of the	Not applicable

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		functioning of such distributed ledger technology	
H.8	Audit	Indication as to whether an audit of the technology used was conducted	true
H.9	Audit outcome	If an audit was conducted, information on the outcome of the audit of the technology used	As we are understanding the question relating to "technology" to be interpreted in a broad sense, the answer to whether an audit of "the technology used" was conducted is "no, we cannot guarantee, that all parts of the technology used have been audited". This is due to the fact this report focusses on risk, and we cannot guarantee that each part of the technology used was audited. Please see: https://docs.dimo.org/docs/security/audits
			Part I – Information on risks
I.1	Offer-related risks	A description of the risks associated with the offer to the public of crypto-assets or their admission to trading	• This white paper has been prepared with utmost caution; however, uncertainties in the regulatory requirements and future changes in regulatory frameworks could potentially impact the token's legal status and its tradability. There is also a high probability that other laws will come into force, changing the rules for the trading of the token. Therefore, such developments shall be monitored and acted upon accordingly. • Liquidity and Secondary Market Risk: At the time of exchange listings, liquidity may have been low and price volatility high. There was no fixed “issue price,” so early trading saw the market discover a price, which could have significantly over- or under-valued the token relative to fundamentals. New token holders who purchased on exchanges early might have faced volatile swings. The token’s trading depends on the continued willingness of exchanges to list it; if any platform delists DIMO (due to low volume or regulatory concerns), liquidity could suffer. • Regulatory Approval Absence: This white paper has not been approved by EU regulators . Thus, there is a risk that regulators could later raise issues or that certain jurisdictions might not honor this white paper as sufficient, potentially restricting the offer or trading in those areas. • Concentration Risk: Early private investors and team members received a substantial portion of tokens at a low entry cost. There is a risk that when their tokens unlock, they could sell large quantities, potentially depressing the market price. Although these allocations vest over time to mitigate immediate impact, their eventual release could increase supply on the market.
I.2	Issuer-related risks	A description of the risks associated with the issuer, if different from the offeror or person seeking admission to trading	• Adoption Risk: The project requires adoption by both drivers (to connect vehicles) and developers/enterprises (to use the data). If DIMO fails to attract a critical mass of users or compelling third-party apps, the utility of the token diminishes. For instance, if only a small number of cars share data, that data is less useful, and demand from developers will be low – leading to low demand for DCX

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			and thus DIMO. There is competition from traditional telematics services and other blockchain mobility projects; DIMO must demonstrate clear advantages to grow. • Technical Development Risk: Building the DIMO infrastructure (hardware, software, integrations) is complex. There could be delays or failures in implementing planned features. If promised functionalities (like paying for insurance with DIMO or broad OEM support) do not materialize, the token's perceived utility could drop. • Smart Contract Risk: While audited, smart contracts are never 100% risk-free. A undiscovered vulnerability could be exploited, leading to loss or freeze of tokens (e.g., a bug in the vesting contract or DCX contract). The risk is mitigated by audits and gradual decentralization, but it's non-zero. If such an event occurred, it might require emergency measures (pausing contracts, deploying fixes) and could erode trust. • Legal and Regulatory, Data Privacy and Compliance Risk: Cryptocurrencies and blockchain-based technologies are subject to evolving regulatory landscapes worldwide. Regulations vary across jurisdictions and may be subject to significant changes. Non-compliance can result in investigations, enforcement actions, penalties, fines, sanctions, or the prohibition of the trading of the crypto-asset impacting its viability and market acceptance. This could also result in the issuer to be subject to private litigation. The beforementioned would most likely also lead to changes with respect to trading of the crypto-asset that may negatively impact the value, legality, or functionality of the crypto-asset. DIMO deals with personal vehicle data. Stricter data protection regulations (GDPR, etc.) or negative publicity around data misuse could hamper the project. The project must ensure drivers' privacy preferences are honored; any breach or misuse of data by an ecosystem participant could lead to lawsuits or loss of user trust. Regulatory compliance in automotive data (for example, EU's proposed Data Act or right-to-repair laws) may impose requirements on DIMO's operations. Non-compliance could force changes or incur penalties. • Scalability and Performance: Handling potentially millions of vehicles' data is challenging. There's risk that the underlying tech (blockchain or off-chain storage) might not scale smoothly. High volumes might raise costs (gas fees on Ethereum L1 could spike, or Polygon could face congestion). If using Base, congestion or downtime on Base could affect DIMO services. If users experience lag or unreliability (e.g., rewards not being distributed timely due to chain issues), they might lose interest. • Security Breaches: Beyond smart contracts, a hack of user accounts, or a 51% attack on Polygon (unlikely but possible with sufficient motive). A breach that allowed an attacker to siphon away DIMO tokens or sensitive data would severely impact confidence. • Insolvency Risk: As with every other commercial endeavor, the risk of insolvency of the issuer is given. This could be caused by but is 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.

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			• Operational Risk: Failure to develop or maintain effective internal control, or any difficulties encountered in the implementation of such controls, or their improvement could harm the issuer's business, causing disruptions, financial losses, or reputational damage. • Reputational Risk: The issuer faces the risk of negative publicity, whether due to, without limitation, operational failures, security breaches, or association with illicit activities, which can damage the issuer reputation and, by extension, the value and acceptance of the crypto-asset. • Competition: There are numerous other crypto-asset projects in the same realm, which could have an effect on the crypto-asset in question. • Unanticipated Risk: In addition to the risks included in this section, there might be other risks that cannot be foreseen. Additional risks may also materialize as unanticipated variations or combinations of the risks discussed.
I.3	Crypto-assets-related risks	A description of the risks associated with the crypto-assets	• High Volatility: The price of DIMO can fluctuate widely in short periods due to speculative trading, macro crypto market swings, or project news. Holders must be prepared for significant losses; the token has no intrinsic price floor. Low liquidity at times could amplify volatility – large buy or sell orders might drastically move the price. • No Intrinsic Value Guarantee: As a utility token, DIMO's value is not backed by physical assets or guaranteed revenue streams. If the market loses confidence in the project's potential, the token could lose most or all of its value. Unlike asset-backed tokens, there is nothing to redeem in exchange for DIMO (no floor via collateral). • Investor/Speculator Behavior: A substantial portion of DIMO tokens could be held by speculators who are not using it for its utility. If speculative sentiment turns negative or if they exit en masse, the price could crash independent of project fundamentals. Conversely, hype can drive price far above actual utility value, leading to a bubble-and-burst dynamic. • Liquidity Risk: While currently listed on several exchanges, there's no guarantee that trading will remain active. Crypto exchanges can suffer hacks, go insolvent, or delist tokens that don't meet volume or compliance criteria. If major exchanges delist DIMO (for example, if regulatory pressure builds on unregistered tokens), holders might find it difficult to buy/sell except on decentralized exchanges, which could have less liquidity. • Correlation and Crypto Market Risk: DIMO, like many altcoins, could be strongly correlated with Bitcoin/Ethereum and the broader crypto market. A downturn (crypto bear market) often sees altcoin prices drop significantly as investors flee to safety. Even if DIMO's project progresses, macro conditions can overshadow it (e.g., 2022's bear market dragged down many fundamentally sound projects). • Exchange/Custodial Risk: Users who keep DIMO on exchanges or custodial wallets face the risk of those custodians failing (as seen in some crypto exchange collapses). If an exchange holding DIMO on behalf of users is hacked or insolvent, users might lose their tokens. Also, if DIMO's network migrates (to Base), exchanges need to support bridging or the new network – any technical mishap in that process could lead to temporary loss of access or confusion in markets.

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			• Tax and Accounting Risk: The regulatory status of utility tokens for tax purposes is evolving. Token holders may face uncertain tax treatment. Misunderstanding this could lead to unexpected liabilities or compliance issues for holders. From the project side, unclear regulations could impose unexpected costs (like VAT on token sales or corporate tax on foundation-held tokens appreciation).
I.4	Project implementation-related risks	A description of the risks associated with project implementation	• Financial Viability of the Project: The project's treasury is finite (the foundation has funds in stablecoins and tokens). If the project cannot eventually become self-sustaining (i.e., generate revenue from enterprise data consumers to fund operations) , there's a risk the foundation runs low on funds. While they have several years of runway, mismanagement or lack of uptake could strain finances, potentially impacting development pace or causing the project to seek additional funding through token sales (which could dilute value). If the foundation had to sell significant DIMO from treasury to extend runway, that could depress the token price. • Operational Dependence on Key Contributors: The current development is largely driven by key team members. If several key developers or leaders were to leave the project the project's progress could slow significantly. While open-source, the community may not readily replace the expertise. There's also execution risk if the Foundation fails to effectively allocate treasury funds (e.g., if funded initiatives don't deliver results). • Asset Security: Crypto-assets face unique security threats, including the risk of theft from exchanges or digital wallets, loss of private keys, and potential failures of custodial services. Since crypto transactions are generally irreversible, a security breach or mismanagement can result in the permanent loss of assets, emphasizing the importance of strong security measures and practices. • Scams: The irrevocability of transactions executed using blockchain infrastructure, as well as the pseudonymous nature of blockchain ecosystems, attracts scammers. Therefore, investors in crypto-assets must proceed with a high degree of caution when investing in if they invest in crypto-assets. Typical scams include – but are not limited to – the creation of fake crypto-assets with the same name, phishing on social networks or by email, fake giveaways/airdrops, identity theft, among others. • Privacy Concerns: All transactions on the blockchain are permanently recorded and publicly accessible, which can potentially expose user activities. Although addresses are pseudonoymous, the transparent and immutable nature of blockchain allows for advanced forensic analysis and intelligence gathering. This level of transparency can make it possible to link blockchain addresses to real-world identities over time, compromising user privacy. • Regulatory Uncertainty: The regulatory environment surrounding crypto-assets is constantly evolving, which can directly impact their usage, valuation, and legal status. Changes in regulatory frameworks may introduce new requirements related to consumer protection, taxation, and anti-money laundering compliance, creating uncertainty and potential challenges for investors and businesses operating in the crypto space. Although the crypto-asset do not create or confer any contractual or other obligations on any party, certain regulators may nevertheless qualify the crypto-asset as a security or other financial instrument under their applicable law, which in turn would have drastic consequences for the crypto-asset, including the potential loss of the invested capital in the asset. Furthermore, this could lead to the

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			sellers and its affiliates, directors, and officers being obliged to pay fines, including federal civil and criminal penalties, or make the crypto-asset illegal or impossible to use, buy, or sell in certain jurisdictions. On top of that, regulators could take action against the issuer as well as the trading platforms if the regulators view the token as an unregistered offering of securities or the operations otherwise as a violation of existing law. Any of these outcomes would negatively affect the value and/or functionality of the crypto-asset and/or could cause a complete loss of funds of the invested money in the crypto-asset for the investor. • Counterparty risk: Engaging in agreements or storing crypto-assets on exchanges introduces counterparty risks, including the failure of the other party to fulfill their obligations. Investors may face potential losses due to factors such as insolvency, regulatory non-compliance, or fraudulent activities by counterparties, highlighting the need for careful due diligence when engaging with third parties. • Reputational concerns: Crypto-assets are often subject to reputational risks stemming from associations with illegal activities, high-profile security breaches, and technological failures. Such incidents can undermine trust in the broader ecosystem, negatively affecting investor confidence and market value, thereby hindering widespread adoption and acceptance. • Technological Innovation: New technologies or platforms could render DIMO's design less competitive or even break fundamental parts (i.e., quantum computing might break cryptographic algorithms used to secure the network), impacting adoption and value. Participants should approach the crypto-asset with a clear understanding of its speculative and volatile nature and be prepared to accept these risks and bear potential losses, which could include the complete loss of the asset's value. • Community and Narrative: As the crypto-asset has no intrinsic value, all trading activity is based on the intended market value is heavily dependent on its community and the popularity of the memecoin narrative. Declining interest or negative sentiment could significantly impact the token’s value. • Interest Rate Change: Historically, changes in interest, foreign exchange rates, and increases in volatility have increased credit and market risks and may also affect the value of the crypto-asset. Although historic data does not predict the future, potential investors should be aware that general movements in local and other factors may affect the market, and this could also affect market sentiment and, therefore most likely also the price of the crypto-asset. • Anti-Money Laundering/Counter-Terrorism Financing: It cannot be ruled out that crypto-asset wallet addresses interacting with the crypto-asset have been, or will be used for money laundering or terrorist financing purposes, or are identified with a person known to have committed such offenses. • Market Abuse: It is noteworthy that crypto-assets are potentially prone to increased market abuse risks, as the underlying infrastructure could be used to exploit arbitrage opportunities through schemes such as front-running, spoofing, pump-and-dump, and fraud across different systems, platforms, or geographic locations. This is especially true for crypto-assets with a low market capitalization and few trading venues, and potential investors should be aware that this could lead to a total loss of the funds invested in the crypto-asset.

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			• Timeline and Milestones: Critical project milestones could be delayed by technical, operational, or market challenges.
I.5	Technology-related risks	A description of the risks associated with the technology used	• The DIMO protocol leverages blockchain technology, ERC-20 tokens, NFTs, and smart contracts, which may carry inherent risks, including but not limited to: o Smart contract vulnerabilities, including bugs or exploits. o Operational disruptions due to network congestion or blockchain downtime. o Risks of private key mismanagement or loss. o Potential regulatory and compliance shifts affecting technology use. o Risks associated with reliance on third-party blockchain platforms (Ethereum, Polygon, Base, Solana). • The DIMO platform utilizes cloud hosting services, which involves specific risks including: o Service interruptions or downtime due to cloud hosting services outages, network instability, or maintenance. o Data breaches or unauthorized access due to vulnerabilities in infrastructure. o Performance degradation caused by increased traffic loads, misconfigurations, or regional disruptions. o Compliance and regulatory risks associated with data storage and processing through cloud providers. • Smart Contract Risks Vulnerabilities: The smart contract governing the token could contain bugs or vulnerabilities that may be exploited, affecting token distribution or vesting schedules. • Wallet and Storage Risks Private Key Management: Token holders must securely manage their private keys and recovery phrases to prevent permanent loss of access to their tokens, which includes Trading-Venues, who are a prominent target for dedicated hacks. • Compatibility Issues: The tokens require compatible wallets for storage and transfer. Any incompatibility or technical issues with these wallets could impact token accessibility. • Network Security Risks Attack Risks: The blockchain may face threats such as denial-of-service (DoS) attacks or exploits targeting its consensus mechanism, which could compromise network integrity.
I.6	Mitigation measures	Mitigation measures of the risks associated with the technology, if any	DIMO has implemented various measures to mitigate these technology-related risks: • Rigorous independent security audits conducted on smart contracts. • Administrative smart contract upgradeability to swiftly address vulnerabilities. • Multi-signature governance structure to secure administrative privileges. • AML/KYC compliance via Chainalysis integration to monitor token distributions.

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			• Active community governance enabling rapid identification and response to technological issues. To address and mitigate the cloud-related risks, DIMO and DIMO vendors implement: • Regular backups and redundancy strategies across multiple cloud hosting services zones. • Continuous performance monitoring and automated alerts to rapidly detect and respond to incidents. • Implementation of robust access control and encryption practices to secure sensitive data stored within the cloud hosting services. However, it cannot be ensured that the implemented mitigation measures address and/or mitigate all the risks associated with the technology. Uncertainties in the regulatory requirements and future changes in regulatory frameworks could potentially impact the token's legal status and its tradability.
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	Information referred to Commission Delegated Regulation establishing technical standards adopted pursuant to Article 6(12), fourth subparagraph, Article 19(11), fourth subparagraph, Article 51(15), fourth subparagraph, and Article 66(6), fourth subparagraph of Regulation (EU) 2023/1114 of the European Parliament and of the Council	Where possible, the DIMO Network Limited seeks to operate the most energy efficient and least environmentally impactful product. Environmental Impact of the DIMO Network and Token: The operation of the DIMO crypto-asset involves two main components with environmental footprints: (1) the blockchain networks used (Polygon, Ethereum/Base), and (2) the IoT hardware and data infrastructure. • Blockchain Energy Consumption: DIMO deliberately uses Proof-of-Stake (PoS) blockchain networks which have substantially lower energy usage than traditional Proof-of-Work (PoW) networks. o PoS is a consensus mechanism used in blockchain networks as an alternative to PoW. PoS relies on validators holding a certain amount of cryptocurrency to secure the network and validate transactions, as opposed to the energy-intensive mining process used in PoW. Compared to PoW, PoS has a much lower environmental impact. PoW requires miners to solve complex mathematical problems using large amounts of computational power, which consumes a significant amount of electricity. This has led to concerns about the environmental impact of PoW, as it contributes to greenhouse gas emissions and climate change. o In contrast, PoS requires much less energy to operate, as validators are not required to perform complex calculations. This means that the environmental impact of PoS is significantly lower than that of PoW. o Additionally, some PoS networks have implemented various sustainability measures, such as using renewable energy sources or carbon offsets, to further reduce their environmental impact. However, it is worth noting that PoS is not without environmental impact. While it may not consume as much energy as PoW, PoS still requires the use of computers and servers, which have their own environmental impact in terms of manufacturing and disposal. Additionally, the energy consumption of PoS networks can increase as the number of validators and transactions on the network grows. o Overall, PoS is a more environmentally friendly alternative to PoW.

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			• IoT Devices and Data Infrastructure: DIMO's goal of connecting vehicles has an IoT hardware component: • Device Manufacturing: The DIMO Data Miner hardware (an OBD-II dongle) has a physical manufacturing footprint (materials like plastics, chips, etc.) and shipping impact. While small in size, producing these at scale (potentially millions if widely adopted) does have environmental impact in terms of resource use and e-waste potential. However, DIMO devices are intended to improve efficiency (see below) which likely offsets their footprint. The project encourages sustainable manufacturing partners where possible, and the devices are designed to be durable for long use (thus not frequently replaced). • Cloud Storage and Processing: DIMO's backend servers store and process vehicle data. Cloud data centers do consume electricity and have a carbon footprint. The DIMO Foundation likely uses major cloud providers that are increasingly using renewable energy. The scale of data (depending on user base) could become large; storing high-frequency vehicle telemetry for millions of cars could mean petabytes of data, with corresponding energy to run servers and cooling. The project will monitor and possibly optimize this (like compressing data, deleting unnecessary data) to minimize energy waste. Also, if more storage nodes are decentralized among users, that energy load is distributed and often using spare capacity. • Computation (AI, analytics): If DIMO implements heavy data analytics or AI on the collected data, that could incur compute power. However, those would be optional services. The baseline operation is just collecting and relaying data, which is relatively light computationally. Positive Environmental Use-Cases: A core motivation of DIMO is to enable smarter, more efficient use of vehicles: • By providing drivers insights into their driving and vehicle health, DIMO can encourage more fuel-efficient driving (thus reducing emissions) and timely maintenance (improving vehicle longevity, reducing waste). • DIMO data can power applications like optimized route planning, car-sharing, and fleet optimization, which can reduce overall vehicle usage and traffic. For instance, better car-sharing means fewer idle cars (less manufacturing needed) and potentially fewer total cars on road. • It can facilitate transition to EVs by monitoring battery health and encouraging off-peak charging, which can integrate renewables better. • By decentralizing and incentivizing data sharing, DIMO may accelerate innovations in e-mobility, public transport integration, etc., all of which can have positive climate impacts (though these are indirect and long-term). • Therefore, the net effect of DIMO, if successful, could be environmentally positive, helping cut transportation emissions, which are a major contributor to climate change. This aligns with broader ESG goals. Adverse Impacts Identified: As per principal adverse impact indicators:

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			• Greenhouse Gas (GHG) Emissions: The direct GHG emissions from DIMO's token operations are negligible (PoS chains). Indirectly, cloud services and device manufacturing do contribute some GHG. Without precise data, we acknowledge there is some carbon footprint, but we consider it small relative to many crypto projects and likely outweighed by the benefits DIMO can enable (like reduced vehicle emissions). • Resource Consumption: Manufacturing hardware uses raw materials (metals for electronics, plastic). If DIMO scales to millions of users, that's millions of devices produced. The team can mitigate this by partnering with existing hardware makers (so devices can serve multiple purposes) or recycling programs for old devices. We will include plans for device recycling or buyback to minimize e-waste once devices reach end-of-life. • E-waste: Obsolete or broken DIMO devices would become e-waste. The foundation could consider an e-waste management plan in the future (like providing means for users to send back old devices for proper recycling or disposal). • Energy usage of users: Encouraging constant data streaming and device usage in vehicles might have a minuscule effect on vehicle energy (the device draws a tiny power from car battery). That's negligible in fuel consumption terms. Mitigation Efforts: • DIMO Foundation has pledged to operate sustainably. For example, if significant emissions are identified, they could purchase carbon offsets or invest in environmental projects to compensate. • The use of carbon-neutral or renewable-powered infrastructure is prioritized (Polygon's carbon neutrality, cloud providers with green energy, etc.). • We plan to track and report the project's estimated carbon footprint annually to maintain transparency. If needed, we will incorporate sustainability metrics into governance (the community could vote on sustainability initiatives funded by treasury, for instance). • The DIMO community itself is aligned with the trend of EV adoption and better transportation, which inherently reduces fossil fuel reliance. Many early DIMO users are EV owners tracking their battery and efficiency. • The main potential harm could be increased demand for electronic devices (which ties to resource extraction and e-waste). We consider that manageable and outweighed by long-term emission reduction in transport, but we remain cautious to mitigate those harms. • Sustainable Use of Proceeds (though no capital raise happened): If one views the token distribution, a large part is for community and rewards, and funds raised via private sales are being used to build this platform that has an environmental benefit aim (more efficient mobility). So indirectly, any funds the project uses are towards a venture that should have positive ESG outcomes if successful.

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			In conclusion, the DIMO token and network have a relatively low environmental footprint due to using PoS blockchains and efficient IoT tech. The project is fundamentally aimed at making transportation more sustainable, which aligns it with environmental objectives. No significant adverse climate impacts are anticipated from the crypto-asset itself; nonetheless, the team remains committed to monitoring and minimizing any environmental impact and reporting on sustainability indicators as the project grows.