MiCA Crypto Alliance x XDC NETWORK

XDC MiCA White Paper

Prepared with assistance from the MiCA Crypto Alliance

Index

I.Compliance with duties of information

N	Field	Content
00	Table of contents	
01	Date of notification	N/A
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 this crypto asset is solely responsible for the content of this crypto-asset white paper.
03	Compliance statement in accordance with Article 6(6) of Regulation (EU) 2023/1114	This crypto-asset white paper complies with Title II of Regulation (EU) 2023/1114 of the European Parliament and of the Council and, to the best of the knowledge of the management body, the information presented in the crypto-asset white paper is fair, clear and not misleading and the crypto-asset white paper makes no omission likely to affect its import.

N	Field	Content
04	Statement in accordance with Article 6(5), points (a), (b), (c) of Regulation (EU) 2023/1114	The crypto-asset referred to in this crypto-asset white paper may lose its value in part or in full, may not always be transferable, and may not be liquid.
05	Statement in accordance with Article 6(5), point (d), of Regulation (EU) 2023/1114	FALSE
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.

II. Summary

N	Field	Content
07	Warning in accordance with Article 6(7), second subparagraph, of Regulation (EU) 2023/1114	Warning The summary should be read as an introduction to the crypto-asset white paper. The prospective holder should base any decision to purchase this crypto asset on the content of the crypto-asset white paper as a whole and not on the summary alone. The offer to the public of the 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	XDC is the native cryptocurrency of the XDC Network, an enterprise-grade, open-source hybrid blockchain protocol designed to support interoperable smart contracts, low-cost transactions, and real-world applications in global trade finance. The XDC Network operates on a XinFin delegated proof-of-stake (XDPoS) consensus mechanism, which ensures block time within approximately two seconds and finality within six seconds (three blocks), and supports high transaction throughput with low energy usage. The protocol is Ethereum Virtual Machine (EVM)-compatible and is structured to accommodate both public and permissioned environments, thereby enabling integration between decentralized infrastructure and enterprise systems. XDC is used throughout the network to pay for transaction fees, to support the system of trusted validators who confirm transactions, and to serve as a means of value exchange within the platform. It is required for activities such as using applications built on the XDC Network, settling payments, and interacting with private networks that are linked to the public blockchain. The token is essential for enabling secure and efficient operations across the system.

N	Field	Content
		At genesis, approximately 37.5 billion XDC tokens were pre-mined and allocated to the genesis wallet. This pre-mined allocation represents the initial distribution at the launch of the mainnet and does not constitute the total maximum supply. The total supply adjusts over time as new tokens are minted as block subsidies and as tokens are burned. The XDC Network does not employ an energy-intensive mining mechanism; rather, participants interact with the existing token supply through staking, transactions, and other network operations. The circulating supply, calculated as the total supply minus tokens held in masternode stakes, team-controlled reserves, and locked pre-placement allocations, The circulating supply is approximately 16.6 billion XDC in August 2025. The total supply at this time is approximately 38 billion XDC. Under MiCA, XDC is classified as a token in the “other” category. It is neither an asset-referenced token nor an e-money token, as it is not pegged to specific assets or backed by currency to maintain a stable value. Furthermore, XDC is not solely designed to provide access to a specific good or service. Rather, it functions as the settlement mechanism for decentralized applications built on the network., facilitating transactions, playing a role in consensus, and constituting the unit of account for gas payments, which enables smart contract-based activity.
10	**Key information about the offer to the public or admission to trading**	The predecessor of XDC, XDCE, was offered through an Initial Coin Offering (ICO) prior to the swap of one for another. XDC instead is not being offered; rather, it is available for trading on numerous wallets and crypto asset exchanges globally. This method allows users to purchase XDC directly from the open market. XDC can also be obtained as block rewards. At the inception of the XDC Network, approximately 37.5 billion XDC tokens were pre-mined and allocated to the genesis wallet. This pre-mined supply represents the initial allocation at the network's launch and is not the total maximum supply. There is no maximum supply as additional tokens can be minted over time, adjusting for any tokens burned.

N	Field	Content
		A portion of the total supply was retained by the founding team and related ecosystem organizations to support network growth, development, liquidity, and strategic partnerships. The remainder was allocated for community incentives, technical grants, and distribution to early supporters. To promote transparency and market confidence, token unlocks from the pre-mined supply follow defined vesting schedules. Distributions are disclosed through official channels and aligned with long-term ecosystem objectives. XDC's circulating supply increases gradually over time in line with these predefined allocations. Once secondary market trading began, the price of XDC became subject to open market dynamics, determined by supply and demand on participating exchanges. XDC is now listed on a wide range of global trading platforms, including Bitfinex, KuCoin, Gate.io, Binance.US, and other centralized and decentralized exchanges. Trading pairs include major fiat currencies (e.g., USD, EUR) and digital assets (e.g., BTC, ETH, USDT), making XDC accessible to both retail and institutional market participants. XDC can be stored using custodial services on exchanges or through non-custodial wallets such as Metamask and D'Cent, providing users with flexible options for secure asset management.

Part A: Information about the offeror or the person seeking admission to trading

N	Field	Content
A.1	Name	XINFIN FINTECH PTE. LTD.
A.2	Legal form	Exempt Private Company Limited by Shares (ELF: EXPLC)
A.3	Registered address	111 North Bridge Road, #08-04, Peninsula Plaza, Singapore 179098
A.4	Head office	111 North Bridge Road, #08-04, Peninsula Plaza, Singapore 179098
A.5	Registration date	2017-06-30
A.6	Legal entity identifier	N/A
A.7	Another identifier required pursuant to applicable national law	Unique Entity Number (UEN): 201718203Z
A.8	Contact telephone number	+971 4 395 0076
A.9	E-mail address	info@xinfin.org
A.10	Response time (days)	30
A.11	Parent company	N/A as no parent company
A.12	Members of management body	<table><tr><th>Identity</th><th>Function</th><th>Business Address</th></tr><tr><td>Atul Khekade</td><td>Co-Founder, Technology & Ecosystem Development</td><td>111 North Bridge Road, #08-04, Peninsula Plaza, Singapore 179098</td></tr><tr><td>Ritesh Kakkad</td><td>Co-Founder, Early Investor, Blockchain Strategist</td><td>111 North Bridge Road, #08-04, Peninsula Plaza, Singapore 179098</td></tr></table>
A.13	Business activity	• **Computer Software Platforms:** XinFin Fintech Pte. Ltd. is the original developer of the XDC Network, an open-source, enterprise-grade Layer 1 blockchain protocol optimized for trade finance and real-world asset tokenization. The network employs a XDPoS consensus mechanism and is compatible with the Ethereum Virtual Machine (EVM), facilitating the deployment of smart contracts and decentralized applications (dApps).

N	Field	Content
		• **Software as a Service (SaaS)**: XinFin Fintech Pte. Ltd. offers solutions like TradeFinex, a decentralized platform for tokenizing trade finance instruments and managing digital trade documentation on the XDC Network, facilitating paperless, borderless commerce. • **Platform as a Service (PaaS)**: The company enables third-party projects and consortiums to launch permissioned blockchain environments—referred to as gasless subnets—which anchor securely to the XDC mainnet, providing scalable and regulatory-compliant infrastructure solutions. Other activities are described in indicator F.11.
A.14	Parent company business activity	N/A
A.15	Newly established	FALSE
A.16	Financial condition for the past three years	N/A
A.17	Financial condition since registration	XinFin Fintech Pte. Ltd., incorporated in June 2017, was initially capitalized with a paid-up amount of SGD 62,500. XinFin's financial condition is robust, with ample and diverse resources, as indicated by its significant funding and the development of a comprehensive blockchain network that integrates with legacy systems and other blockchains. The company has also engaged in global partnerships and collaborations to enhance its offerings and provide counterparty risk mitigation solutions. Additionally, XinFin has a strong presence in the financial technology sector, with a focus on improving inefficiencies in the trade finance sector and offering regulatory-approved, KYC-integrated services.

Part B: Information about the issuer, if different from the offeror or person seeking admission to trading

N	Field	Content
B.1	Issuer different from offeror or person seeking admission to trading	FALSE
B.2	Name	N/A
B.3	Legal form	N/A
B.4	Registered address	N/A
B.5	Head office	N/A
B.6	Registration date	N/A
B.7	Legal entity identifier	N/A
B.8	Another identifier required pursuant to applicable national law	N/A
B.9	Parent company	N/A
B.10	Members of the management body	N/A
B.11	Business activity	N/A
B.12	Parent company business activity	N/A

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.This section is not applicable as this white paper has not been drawn up by the operator of a trading platform. During or at the end of the transition period established in Article 143(2)(b) of Regulation (EU) 2023/1114, operators of trading platforms may complete this section.

N	Field	Content
C.1	Name	N/A
C.2	Legal form	N/A
C.3	Registered address	N/A
C.4	Head office	N/A
C.5	Registration date	N/A
C.6	Legal entity identifier	N/A
C.7	Another identifier required pursuant to applicable national law	N/A
C.8	Parent company	N/A
C.9	Reason for crypto-asset white paper preparation	N/A
C.10	Members of management body	N/A
C.11	Operator business activity	N/A
C.12	Business activity of parent company	N/A
C.13	Other persons drawing up the crypto-asset white paper according to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114	N/A
C.14	Reason for drawing the white paper by persons referred to in Article 61, second subparagraph, of Regulation EU 2023/1114	N/A

Part D: Information about the crypto-asset project

N	Field	Content
D.1	Crypto-asset project name	XDC Network
D.2	Crypto-asset's name	XDC / XDC Token
D.3	Abbreviation	XDC
D.4	Crypto-asset project description	The XDC Network is a decentralized, open-source Layer 1 blockchain platform designed for low-cost, high-speed transactions and real-world asset tokenization, particularly in trade finance and institutional applications. It supports smart contracts, decentralized applications (dApps), and hybrid network configurations for both public and permissioned environments, meeting enterprise-grade technical and compliance requirements while maintaining decentralization. The network is sustained by a global set of validators, developers, infrastructure providers, and organizations such as the XDC Foundation. It features permissioned gasless subnets and cross-chain interoperability to bridge public and private systems. The XDC Network employs the XDPoS framework for validator governance and block production. As of XDC 2.0, the consensus engine has transitioned from Istanbul BFT to a Chained HotStuff protocol. This upgrade enhances deterministic finality and network liveness by leveraging a three-phase commit process and rotating leader selection. Each block is finalised with signatures from at least two-thirds of the 108 active validators, preventing forks and ensuring transaction irreversibility under Byzantine fault conditions. Validator rotation mitigates centralisation risks, while the system maintains throughput of over 2,500 transactions per second under optimal conditions. The architecture supports scalable smart contract deployment for both enterprise and public-sector applications.

<table>
<tr><th>N</th><th>Field</th><th>Content</th></tr>
<tr><td>D.5</td><td>Details of all natural or legal persons involved in the implementation of the crypto-asset project</td><td>
<table>
<tr><th>Name</th><th>Address/Domicile</th></tr>
<tr><td>XinFin Fintech Pte. Ltd.
Founding entity responsible for the initial development and launch of the XDC Network, including the pre-mining.</td><td>111 North Bridge Road, #08-04, Peninsula Plaza, Singapore 179098</td></tr>
<tr><td>XDC Foundation:
Not-for-profit entity supporting ongoing development, governance coordination, education, and community engagement for the XDC Network.</td><td>SIX, Second Floor, Cricket Square, Hutchins Drive, P.O. Box 2681 Georgetown, Grand Cayman KY1-1111</td></tr>
<tr><td>TradeFinex Tech Ltd.
Developer of TradeFinex, a flagship decentralized application built on the XDC Network for tokenizing trade finance instruments.</td><td>Al Maryah Island 2464Res Co-work 04, 25th Floor, Al Sila Tower, Abu Dhabi - United Arab Emirates</td></tr>
</table>
</td></tr>
<tr><td>D.6</td><td>Utility Token Classification</td><td>FALSE</td></tr>
<tr><td>D.7</td><td>Key Features of Goods/Services for Utility Token Projects</td><td>N/A as XDC is not a utility token</td></tr>
<tr><td>D.8</td><td>Plans for the token</td><td>Important Milestones
2017: XinFin Fintech Pte. Ltd. pre-mined approximately 37.5 billion XDC tokens at network genesis Additional tokens are minted over time as a subsidy to masternode operators for block creation. A private token sale was conducted to raise funds to support the development of the XDC blockchain protocol.
2018: A public token sale raised funds via the XDCE ERC-20 proxy token, which allowed early investors to acquire XDC before the mainnet was live. XDCE was designed to be swappable 1:1 with native XDC.
2019: The XDC Network mainnet launched on 1 June 2019, led by co-founders Atul Khekade and Ritesh Kakkad and XinFin's development team. It marked the transition from the Ethereum-based XDCE token to a native XDC token, with a 1:1 swap. The launch activated core functionalities including transaction settlement, gas fees in XDC, staking delegation, and smart contract execution. The network operates under a XDPoS model with 108 masternodes (each staked with 10 million XDC); all 108 masternodes have now been claimed; additional standby nodes ensure high availability, of which there are about 130 at present.</td></tr>
</table>

N	Field	Content
		• **2020:** XinFin on behalf of XDC Network became the first Layer 1 blockchain to join the International Trade and Forfaiting Association (ITFA). XDC Network was bridged to R3's Corda enterprise blockchain. • **2021:** XDCE token supply was significantly reduced through community-led burns, including the destruction of 300 million tokens in early 2021 and a further 10 million later that year, supporting the transition to the native XDC token. The Ethereum-based XDCE contract was subsequently retired, making XDC the sole native cryptocurrency of the platform. To drive continued growth and decentralisation, the XDC Foundation was established in 2021. Its mandate includes fostering network development, promoting awareness, and supporting community engagement. In addition, XDC was first listed on major cryptocurrency exchanges such as KuCoin and HitBTC, with trading pairs like XDC/USDT and XDC/BTC. XDC Network also became the first Layer 1 blockchain selected as a member of the global Trade Finance Distribution Initiative (TFDi), a consortium of trade originators and funders. • **2022:** The XDC ecosystem expanded its enterprise infrastructure. The network was integrated with TradeTrust, a Singaporean IMDA platform for electronic trade documents, and the XDC Trade Network was launched for legally compliant handling of trade document tokens. Leveraging Singapore's MLETR framework, the XDC Network supports the use of legally recognised digital trade documents. Network participants also actively engaged with global trade bodies such as ITFA and TFDi to promote regulatory adoption across jurisdictions. Additionally, USDC (bridged via Wanchain) was deployed on XDC to enable on-chain settlement for trade finance. • **2023:** XDC was listed on SBI VC Trade, enabling regulated trading in Japan. Securitize integrated XDC as one of only four networks on its platform at the time, enabling issuance of tokenized U.S. Treasury funds and securities. SBI XDC Network APAC joint venture was established to enhance trade finance solutions in the region. A decentralized autonomous organization (DAO) named DAOFIN (now called XDCDAO) was created to decentralize governance over ecosystem development and grant-giving decisions. Additionally, tokenized U.S. Treasuries ($USTY) and trade finance assets (TRADA) were launched on the XDC Network to enable access to real-world asset markets.

N	Field	Content
		• **2024:** The XDC 2.0 consensus upgrade introduced the HotStuff protocol for consensus, as well as movement from probabilistic finality to 6-second (3-block) deterministic finality, and a 50x increase in transaction fees. Additionally, XinFin upgraded its core infrastructure to EVM version 0.8.23 to improve compatibility with Ethereum-native tooling and DeFi protocols. This enables: ◦ Full support for Solidity 0.8.x features such as safer arithmetic via built-in overflow/underflow protection and custom error handling. ◦ Better integration with Hardhat and Truffle frameworks, improving deployment pipelines. ◦ Foundation for upcoming support of proxy patterns, contract libraries, and standardized gas optimizations. Moreover, an independent third party introduced the Liquid Staking system to enable individual XDC holders to earn masternode staking without meeting the 10 million XDC requirement or hosting infrastructure. **Future Plans for XDC** • **Stablecoins & RWA Tokenisation:** Official Circle USDC and Tether USDT bridges are under works. The 2025 RWA Accelerator with Plug and Play will expand tokenised real-world assets across debt, commodities, and funds. Under a recent partnership between XDC Markets and Archax, the two firms are combining their technologies to enable efficient access to tokenized RWAs. • **DeFi & Cross-Chain Ecosystem:** Efforts are underway to deepen liquidity on Curve, particularly for stablecoins and real-world assets, enhancing capital efficiency across the ecosystem. The year 2025 also sees the deployment of the Stargate bridge for multichain interoperability, allowing for cross-chain application development and liquidity flows. • **Compliance & Institutional Tools:** Extension of CRYMBO's AML/KYC compliance suite is expected to cover a broader range of global financial use cases, ensuring regulatory alignment. Credefi's SME lending platform will also be scaled to support diverse industries and regions, enabling more businesses to access DeFi services. • **Developer & Ecosystem Growth:** The network will boost developer engagement through streamlined testnet tooling and detailed guides, making it easier to build and deploy applications.

<table>
<tr><th>N</th><th>Field</th><th>Content</th></tr>
<tr><td>D.9</td><td>Resource Allocation</td><td>
The supply of XDC tokens is uncapped. 37.5 billion XDC were pre-mined at genesis and allocated at mainnet launch. Unlike purely inflationary mining models, XDC's supply dynamics are governed by a combination of pre-mined tokens, ongoing masternode rewards with a slightly inflationary effect, and a deflationary burning mechanism on transaction fees.

Token Allocation and Vesting
The initial 37.5 billion XDC tokens were allocated into four main categories, each with specific vesting schedules to ensure a stable and predictable release of tokens to the market:
<table>
<tr><th>Allocation Category</th><th>Percentage</th><th>Amount (XDC)</th><th>Vesting Period</th></tr>
<tr><td>Founders/Team</td><td>40%</td><td>15,000,000,000</td><td>3% annual unlock</td></tr>
<tr><td>Ecosystem Development</td><td>27%</td><td>10,000,000,000</td><td>2.5% annual release cap</td></tr>
<tr><td>Contingency Fund</td><td>6%</td><td>2,500,000,000</td><td>Not specified</td></tr>
<tr><td>Pre-Placement</td><td>27%</td><td>10,000,000,000</td><td>In circulation</td></tr>
</table>
Vesting Schedule Details:
• Founders/Team: Tokens unlock at 3% per year to ensure long-term alignment and controlled distribution.
• Ecosystem Development: Releases capped at 2.5% annually, supporting network growth and community incentives.
• Treasury: Held for ongoing network maintenance and operational needs; vesting details are not publicly disclosed.
• Pre-Placement: Distributed to early investors and exchanges.

Circulating Supply (as of August 2025)
<table>
<tr><th>Supply Type</th><th>Amount (XDC)</th></tr>
<tr><td>Total Supply</td><td>38,109,919,133</td></tr>
<tr><td>Team Controlled (Locked)</td><td>21,481,023,351</td></tr>
<tr><td>Circulating Supply</td><td>16,628,895,782</td></tr>
</table>
The circulating supply is calculated by subtracting team-controlled tokens and locked pre-placement tokens from the total supply.
</td></tr>
<tr><td>D.10</td><td>Planned Use of Collected Funds or Crypto-Assets</td><td>N/A as no other funds will be collected via public offering.</td></tr>
</table>

Part E: Information about the offer to the public of crypto-assets or their admission to trading

Most of this section is not applicable as the crypto asset was not offered to the public and has already been admitted to trading. During or at the end of the transition period established in Article 143(2)(b) of Regulation (EU) 2023/1114, operators of trading platforms may complete parts of this section.

N	Field	Content
E.1	Public Offering and/or Admission to trading	N/A as crypto asset has already been admitted to trading and offered to the public.
E.2	Reasons for Public Offer and/or Admission to trading	N/A
E.3	Fundraising Target	N/A
E.4	Minimum Subscription Goals	N/A
E.5	Maximum Subscription Goal	N/A
E.6	Oversubscription Acceptance	N/A
E.7	Oversubscription Allocation	N/A
E.8	Issue Price	N/A
E.9	Official currency or any other crypto-assets determining the issue price	N/A
E.10	Subscription fee	N/A
E.11	Offer Price Determination Method	N/A
E.12	Total Number of Offered/Traded CryptoAssets	N/A
E.13	Targeted Holders	N/A
E.14	Holder restrictions	N/A

N	Field	Content
E.15	Reimbursement Notice	N/A
E.16	Refund Mechanism	N/A
E.17	Refund Timeline	N/A
E.18	Offer Phases	N/A
E.19	Early Purchase Discount	N/A
E.20	Time-limited offer	N/A
E.21	Subscription period beginning	N/A
E.22	Subscription period end	N/A
E.23	Safeguarding Arrangements for Offered Funds /CryptoAssets	N/A
E.24	Payment Methods for Crypto-Asset Purchase	N/A
E.25	Value Transfer Methods for Reimbursement	N/A
E.26	Right of Withdrawal	N/A
E.27	Transfer of Purchased Crypto-Assets	N/A
E.28	Transfer Time Schedule	N/A
E.29	Purchaser's Technical Requirements	N/A
E.30	Crypto-asset service provider (CASP) name	N/A
E.31	CASP identifier	N/A
E.32	Placement form	NTAV
E.33	Trading platforms name	N/A
E.34	Trading platforms Market Identifier Code (MiC)	N/A
E.35	Trading platforms access	N/A

N	Field	Content
E.36	Involved costs	N/A
E.37	Offer Expenses	N/A
E.38	Conflicts of Interest	N/A
E.39	Applicable law	N/A
E.40	Competent court	N/A

Part F: Information about the crypto-assets

N	Field	Content
F.1	Crypto-Asset Type	Cryptoassets other than ARTs and EMTs.
F.2	Crypto-asset functionality	XDC is the native asset of the XDC Network, and can be used to execute secure peer-to-peer transactions and pay for smart contract gas, which in turn enables a myriad of applications including enterprise-grade use cases. Its usage for gas payments deters spam and its usage for staking maintains network security and stability. Additionally, XDC is used to incentivize ecosystem participants, including rewards for masternode operators.
F.3	Planned application of functionalities	All main crypto asset functionalities have already been deployed, though mainnet functionalities are updated or improved constantly.
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	OTHR
F.5	The type of submission	NEWT
F.6	Crypto-Asset Characteristics	XDC is a fungible digital asset and is the native token (“coin”) of the XDC Network. XDC transactions are finalized in approximately six seconds, with minimal network fees amounting to fractions of a cent. The network supports over 2,500 TPS at optimal conditions and 2,000 TPS under stable conditions. XDC is actively used to settle tokenized trade instruments on the TradeFinex platform, where it facilitates invoice discounting, cross-border payments, and programmable financing workflows. While there is no cap to XDC’s supply, 37.5 billion were pre-mined at genesis. XDC ensures predictable issuance through controlled release schedules, locked allocation pools and the block reward scheme. Token distribution is governed across categories such as validator node operation, ecosystem development, contingency reserves, and institutional engagement. While the network does not use smart

N	Field	Content
		contract-based escrows, programmatic token unlock mechanisms and internal governance ensure disciplined market entry of tokens. XDC is supported by various enterprise-grade wallet solutions, including third-party custodial providers like Fireblocks and Metamask.
F.7	Commercial name or trading name	N/A as DTI is provided in F.13.
F.8	Website of the issuer	https://www.xinfin.org/
F.9	Starting date of the offer to the public or admission to trading	2018-02-05
F.10	Publication date	2025-09-01
F.11	Any other services provided by the issuer	XINFIN FINTECH PTE. LTD., the issuer of XDC, provides a range of technology and network infrastructure services to support the functioning and expansion of the XinFin blockchain ecosystem. These services include: • **Website Information Provision** XinFin Fintech Pte. Ltd. maintains and supports a comprehensive set of tools to facilitate network transparency and developer interaction. ○ **XDCscan** is the leading blockchain explorer for the XDC Network, allowing users to track transactions, blocks, contracts, and token holdings in real-time; XDCscan was developed and is maintained by a third party. ○ **XDCfaucet** provides test XDC tokens on the Apothem testnet, enabling developers to experiment with and deploy smart contracts in a sandboxed environment. ○ **XDCpayment** offers a user interface and public developer **API** for integrating XDC-based payments and on-chain queries into merchant platforms and dApps. • **Client Libraries and Middleware Services:** Developer libraries in JavaScript, Python, and other languages are available for simplified integration with the XDC Network. Middleware services support abstraction and data handling layers.

N	Field	Content
		• **Documentation:** XinFin Fintech Pte. Ltd provides detailed documentation and guides covering node types (full, archive, masternode Protector and Observer Node), hardware, KYC uploads, and staking processes. • **Public Awareness and Educational Services:** XinFin Fintech Pte. Ltd. promotes the adoption of blockchain technology in trade finance and global payments by engaging with industry stakeholders and initiatives like the Trade Finance Distribution Initiative (TFDi). It also supports educational efforts by providing resources for developers and enterprises, while showcasing blockchain's benefits in trade finance, public procurement, and digital identity.
F.12	Language or languages of the white paper	English
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	CCQZQXFDC, SRNJBLCPX
F.14	Functionally Fungible Group Digital Token Identifier, where available	2DHMJ018G
F.15	Voluntary data flag	TRUE
F.16	Personal data flag	TRUE
F.17	LEI eligibility	TRUE
F.18	Home Member State	Ireland
F.19	Host Member States	Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden

Part G: Information on the rights and obligations attached to the crypto-assets

N	Field	Content
G.1	Purchaser Rights and Obligations	N/A as crypto asset has already been offered to the public and admitted to trading, and there is no contract governing how crypto asset-holders may hold or use the crypto assets.
G.2	Exercise of Rights and obligations	N/A
G.3	Conditions for modifications of rights and obligations	N/A
G.4	Future Public Offers	N/A
G.5	Issuer Retained Crypto-Assets	N/A
G.6	Utility Token Classification	N/A
G.7	Key Features of Goods/ Services of Utility Tokens	N/A
G.8	Utility Tokens Redemption	N/A
G.9	Utility Tokens Redemption	FALSE
G.10	Crypto-Assets purchase or sale modalities	Multiple Crypto-Asset Service Providers (CASPs) support the trading of XDC, including regulated and global cryptocurrency exchanges such as Bitfinex, KuCoin, BitMart, HTX (formerly Huobi), ProBit, and Bitstamp. XDC is primarily traded on a spot basis, where platforms facilitate direct buy/sell transactions between market participants without acting as counterparties or guaranteeing the execution of trades. Access to these platforms usually requires registration, completion of KYC/AML verification, and account funding. Fee structures and access requirements vary by platform.
G.11	Crypto-Assets Transfer Restrictions	None.

N	Field	Content
G.12	Supply Adjustment Protocols	FALSE
G.13	Supply Adjustment Mechanisms	N/A
G.14	Token Value Protection Schemes	FALSE
G.15	Token Value Protection Schemes Description	N/A
G.16	Compensation Schemes	FALSE
G.17	Compensation Schemes Description	N/A
G.18	Applicable law	There is no written legal agreement between the offeror and the crypto asset-holder that sets out the laws that govern the legal relationship between those two parties. In the absence of such an agreement, the laws that govern that relationship will depend on the location of the issuer and the given crypto asset-holder and characteristic performance of the legal relationship, and any agreed intention of the issuer and crypto asset-holder.
G.19	Competent court	There is no written legal agreement between the offeror and the crypto asset-holder that sets out which jurisdiction's courts will have authority to deal with a dispute between the crypto asset-holder and the issuer. In the absence of such an agreement, the laws of the competent court will depend on the location of the issuer and the given crypto asset-holder and characteristic performance of the legal relationship, and any agreed intention of the issuer and crypto asset-holder.

Part H: Information on the underlying technology

N	Field	Content
H.1	Distributed ledger technology (DLT)	N/A as DTI is provided in F.13.
H.2	Protocols and technical standards	**Network Protocol:** The XDC Network operates on the DPOS BFT Hotstuff consensus, which functions as both a messaging and confirmation layer for compliant domestic and cross-border payments. The protocol is sector-agnostic, enabling integration across industries and jurisdictions, and is designed for interoperability with approved financial institutions. Its hybrid architecture supports transparent public settlement alongside privacy-preserving data handling, making it suitable for regulated, enterprise-grade applications. **Cryptographic Standards:** The XDC Network uses the Elliptic Curve Digital Signature Algorithm (ECDSA) to secure transaction signing and validator commitments. ECDSA is a widely adopted public-key cryptography scheme used in Ethereum and Bitcoin. Each masternode signs a “lock” message that includes its epoch index and public key derived from its private key. These signatures are verifiable on-chain and serve as proof of validator identity and participation. This cryptographic structure allows each masternode to verify the authenticity and source of validator messages, ensuring trust and coordination in the consensus process. **Address Format and Network Prefixing:** The XDC Network employs Ethereum-compatible 40-character hexadecimal addresses derived through standard ECDSA (Elliptic Curve Digital Signature Algorithm) keypair generation and Keccak-256 hashing. To distinguish XDC Network addresses from Ethereum’s, the network employs the conventional 0x prefix as well as the xdc prefix, creating a clear identifier (e.g., xdcabc123...). This prefixing convention reduces the risk of cross-chain errors while preserving full compatibility with Ethereum tooling, allowing users to convert between 0x and xdc formats as needed. Wallets and explorers such as MetaMask and XDCScan support both formats.

N	Field	Content
H.3	Technology Used	XinFin recently upgraded to Chained HotStuff consensus protocol. This upgrade leverages a three-phase commit process and rotating leader selection to enhance deterministic finality and network liveness, ensuring blocks are finalized with signatures from at least two-thirds of the active validators, preventing forks and ensuring transaction irreversibility even under Byzantine fault conditions. Validator rotation further mitigates centralization risks while maintaining high throughput. Additionally, DV preserves the ability to conduct private, permissioned transactions. **Account-Based Model:** The XDC Network uses an account-based model, where each account maintains a balance and smart contract storage. This enables direct updates to account states during transactions and supports advanced applications such as tokenization, validator staking, and smart contract execution. It contrasts with the UTXO model (used in Bitcoin), which does not maintain account balances and is less suitable for complex business logic, and more akin to the Ethereum account model instead. **Ledger and State Model:** The XDC blockchain operates on an EVM-compatible ledger structure, where every block contains the complete state transition from the prior block. The ledger maintains a global state structured as a trie, where each account or smart contract is mapped to a unique address and contains data such as balances, nonces, code, and storage. Transactions modify this state through a deterministic process, and each block includes Merkle roots for transactions, contract state, and execution receipts, ensuring cryptographic verification of the ledger's integrity. **Validator Node Design (Masternodes):** • Stores the complete blockchain ledger. • Produces and verifies blocks. • Participates in governance and staking-based consensus. **Hardware and Hosting Requirements for operating a masternode:** • Possess a minimum of 10 million XDC held in a secure (preferably hardware) wallet. • Maintain 100% uptime with a Tier 3+ IDC environment or equivalent cloud infrastructure (e.g., Amazon EC2, Microsoft Azure). • Operate a dedicated static IP address and stable hosting (dedicated server or high-performance VPS).

N	Field	Content
H.4	Consensus Mechanism	The XDC Network employs a multi-layered consensus architecture based on XDPoS and enhanced with the chained HotStuff consensus and a proprietary DV mechanism. This model ensures deterministic finality, validator accountability, and high throughput suitable for enterprise applications. • **XinFin Delegated Proof of Stake (XDPoS):** It is the foundational protocol under which a fixed set of masternodes (validators) are selected to produce and validate blocks. Validators must stake a minimum of 10 million XDC to participate and are rotated per epoch based on performance and governance rules. Validator selection is performed through a governance-driven delegation process. Token holders may indirectly influence the validator composition via staking delegation proposals or consortium voting frameworks. ◦ Validator Set Size: 108 active validators per epoch. ◦ Staking Requirements: Validators must maintain a fixed stake and fulfill infrastructure criteria, including uptime, static IP, and secure hosting. • **Backup Validators:** In addition to active validators, the XDC Network maintains a pool of Standby Masternodes, which are eligible to replace underperforming or offline validators. These nodes do not participate in consensus unless promoted, and their number is not fixed per epoch. Additionally, each validator is paired with two Protector Nodes that serve as designated backups to ensure continuity of block production and share in the validator's rewards. • **Chained HotStuff Consensus (XDC 2.0):** Replacing the earlier IBFT XDPoS, Chained HotStuff introduces a three-phase commit process with rotating leader selection. This improves both network liveness and safety under Byzantine fault conditions. Each block proposal must be signed by at least two-thirds of the validator set to be finalized, ensuring irreversible settlement and eliminating the risk of chain reorganization or forks. • **Double Validation (DV):** Only masternodes (also referred to as full nodes) are authorized to produce and validate blocks. To strengthen consensus security and reduce the risk of block manipulation or fork creation, the XDC Network implements a DV scheme: ◦ **Block Creator:** A masternode selected through a round-robin scheduling algorithm is designated to create a block during a given epoch. This node signs the block with its private key and

N	Field	Content
		proposes it to the network. ○ **Block Verifier**: Once a block is proposed, all remaining masternodes verify and vote for the block by signing. A block is confirmed once ¾ of the masternodes vote, and it is finalized once two subsequent blocks are confirmed. • Epoch Timing and Validator Rotation: ○ **Epoch Length**: 900 blocks per epoch. ○ **Block Finality**: ~6 seconds per block. ○ **Block Time**: ~2 seconds per block. ○ **Validator Turn Rotation**: Each validator produces blocks in a round-robin schedule within an epoch. ○ **Reward Distribution**: Validator rewards are disbursed after every epoch and can be withdrawn after the epoch ends. Validators failing to meet performance thresholds (e.g., uptime or signing behavior) are rotated out, and standby nodes are activated in their place. • **Slashing and Validator Discipline**: Misbehavior such as missed blocks, equivocation (e.g., signing multiple blocks at the same height), or prolonged downtime results in temporary removal from the validator set and forfeiture of staking rewards. ○ **On-chain slashing** is triggered when a validator signs two blocks at the same consensus step (equivocation). This can result in partial or full loss of their staked XDC. ○ **Off-chain slashing** is governed by the **reportBenign** or **reportMalicious** functions in the Validator Set smart contract. If ≥2/3 of validators confirm a report, the offending node is slashed—typically by 4% or more depending on severity. ○ Penalty Behavior: Slashed validators may continue to verify blocks to demonstrate liveness but are excluded from rewards and block scheduling during the penalty period.

N	Field	Content
		Technical Comparison with Other Systems: • **Proof of Work (PoW):** PoW systems (e.g., Bitcoin) rely on leader-based mining, where nodes solve computational puzzles to produce blocks and secure the network. While effective, this process is energy-intensive and introduces delayed finality due to reliance on probabilistic consensus and chain depth. In contrast, the XDC Network eliminates mining entirely. Block producers are deterministically selected, and blocks are finalized within ~6 seconds using validator quorum and dual-signature confirmation. This structure delivers significantly faster and more energy-efficient settlement than PoW networks. • **Proof of Stake (PoS):** PoS systems (e.g., Ethereum) assign block production rights based on token ownership and staking. While this improves efficiency over PoW, it can result in centralization risks, where control of the network disproportionately favors large stakeholders when it does not support stake delegation. The XDC Network mitigates these risks through: ◦ Supporting stake delegation. ◦ A fixed-size validator set selected via governance and staking thresholds. ◦ A Double Validation layer, which separates block production and validation duties, reducing collusion risk. ◦ Active slashing and validator rotation mechanisms that penalize misbehavior and promote uptime-based fairness.
H.5	Incentive Mechanisms and Applicable Fees	• **Validator and Staking Incentives:** At the end of each epoch, a checkpoint block aggregates block-signing activity through a block signer smart contract. Rewards are distributed based on each masternode's signature count within that epoch. Validators are selected in sequential order. Failure to produce a block triggers a 10-second delay and forfeits the opportunity. ◦ **Block Rewards:** A total of 250 XDC is distributed per epoch via the block signer smart contract, proportional to the number of blocks signed by each masternode during the epoch. ◦ **Manual Subsidy:** In addition to block rewards, a fixed subsidy of 22,500 XDC per month is manually disbursed by the foundation to masternodes. This brings the total monthly masternode reward to approximately 66,000 XDC.

N	Field	Content
		○ **Staking Incentives:** Coin-holders who delegate stake to masternodes and maintain their vote through the epoch are eligible for a share of the staking rewards, typically disbursed alongside infrastructure rewards according to internal masternode policies. ○ **Foundation Allocation:** A separate 10% of emissions is allocated to the foundation to support development and ecosystem activities. • **Transaction Fees:** The XDC Network employs an EVM-compatible gas fee system, where users pay transaction fees in XDC based on computational effort. This model ensures affordability while deterring spam and promoting transaction reliability. ○ Minimum Gas Price: 1 wei (extremely low-cost) ○ Fee Recipient: Validators who finalize the block. ○ Prioritization: Transactions are ordered based on gas price per unit.
H.6	Use of Distributed Ledger Technology	FALSE
H.7	DLT Functionality Description	N/A as the XDC Network is not operated by XINFIN FINTECH PTE. LTD. or any third party acting on its behalf.
H.8	Audit	TRUE
H.9	Audit outcome	**Past Audit History: XDPoS Consensus (ChainSecurity, 2020):** In 2020, ChainSecurity, an independent blockchain security firm, conducted an in-depth audit of the XDPoS consensus protocol. **Audit Scope and Objectives:** • **Security:** ChainSecurity assessed the correctness of the validator rotation, epoch structure, and voting mechanics. • **Slashing Conditions:** Logic for penalizing malicious or inactive validators was verified. • **Consensus Integrity:** Reviewed the Double Validation logic, epoch management and signature verification. • **Methodology:** ChainSecurity applied • **White-box testing:** Manual review of validator smart contracts and staking code. Each line was reviewed to ensure logic correctness,

N	Field	Content
		protection against race conditions, and integrity of slashing and reward distribution systems. • **Grey-box testing:** Contract modules were tested in a simulated network to evaluate runtime behavior, epoch transitions, and edge-case validator participation. This enabled observation of interactions under partially known system conditions, simulating likely failure modes and operational delays. The audit scope specifically included validator set rotation, epoch state transition handling, signature aggregation, Double Validation triggers, and on-chain slashing logic.. **Findings and Results:** The XDPoS protocol met operational security expectations for a public blockchain and provided a robust validator selection and block validation process. • No Critical or High-Risk Issues: The audit confirmed that core consensus operations were implemented securely. • Low-Severity Recommendations: ChainSecurity suggested minor improvements in documentation clarity and code structure, which were implemented. **Past Audit History: XDPosChain Infrastructure (SlowMist, 2021)** In April 2021, the SlowMist security team conducted a detailed security audit of the XDPosChain infrastructure. The audit examined core protocol logic, validator interaction, and code-level implementation of staking and block validation mechanisms. **Findings and Results:** Several low-severity issues were identified, primarily related to code robustness and input validation. No critical vulnerabilities were found. All recommendations were promptly addressed by the XinFin development team. **Conclusion:** SlowMist concluded that the XDPosChain demonstrated a strong security posture appropriate for a public blockchain. **Recent Audit: XDC 2.0 Protocol Upgrade (CertiK, 2023):** In 2023, XinFin commissioned CertiK, a globally recognized blockchain security auditor, to perform a comprehensive review of the XDC 2.0 upgrade. This version introduced enhancements such as the Chained HotStuff-inspired consensus layer (XDPoS 2.0), a refined staking model, inflation controls, and protocol-level tokenomics improvements.

N	Field	Content
		Audit Scope and Objectives: • Code Integrity: Assess the new consensus and staking features introduced in XDC 2.0. • Protocol Security: Verify protections against validator collusion, double-signing, and block reordering. • Operational Resilience: Ensure fault tolerance and validator recovery are robustly implemented. • Governance Readiness: Evaluate contract-level controls for upgrade and validator selection mechanisms. **Methodology:** CertiK applied a multi-layered audit process that included: • **Static Analysis:** To detect known vulnerabilities, gas inefficiencies, and dangerous coding patterns. • **Manual Review:** Line-by-line inspection by experienced auditors to uncover logic flaws and misimplementations. • **Comparative Analysis:** Against industry-standard smart contracts and governance systems. • **Attack Surface Testing:** Validation against both common and uncommon vectors. • **Best Practice Assessment:** Evaluating code quality, structure, privilege management, and documentation. **Findings and Results**: A total of 57 issues were uncovered. The protocol received a "AA" rating, placing it in the top 10% of audited blockchain projects. No critical or high-risk issues were identified in core logic, and "excellent" scores were awarded in the following CertiK categories: • Code Security • Operational Resilience • Community Trust • Market Stability **Conclusion:** The audit concluded that XDC 2.0 is secure, reliable, and ready for mainnet deployment. XinFin acted on all minor findings and has incorporated audit recommendations into the finalized codebase.

Part I: Information on the risks

N	Field	Content
I.1	Offer-Related Risks	N/A as the crypto asset has already been offered to the public.

I.2	Issuer-Related Risks	While the XDC Network is decentralised, the issuer of the XDC token, XinFin Fintech Pte. Ltd., holds an important role in the development and promotion of the XDC Network. XinFin Fintech Pte. Ltd. is exposed to several risks:
		• **Treasury and Token Allocation Risks:** XinFin Fintech Pte. Ltd. manages a significant portion of the 37.5 billion pre-mined XDC supply. Changes in circulating supply are determined by internal release schedules and vesting structures. These holdings fund ecosystem development, validator incentives, and infrastructure operations. Any disruptions in the controlled release, sale, or application of these tokens due to market illiquidity, strategic delays, or regulatory intervention could limit the issuer's ability to sustain core network functions.
		  ○ **Token Unlock and Vesting Control:** A portion of the total XDC supply is reserved for team, advisors, and ecosystem development, subject to internal vesting mechanisms. As these allocations become liquid, large-scale token movements may influence market dynamics, especially in illiquid conditions, which can affect price volatility or reputational risk.
		  ○ **Treasury Discretion and Governance:** The issuer retains discretionary authority over the Ecosystem Development Fund and other major allocations, introducing the risk of suboptimal treasury deployment.
		  ○ **Custodial Centralization of Reserves:** Token reserves under issuer or foundation control are held in centralized custody, with associated custody risks.
		• Internal Efficiency and Control Risks:
		  ○ **Resource Allocation Efficiency:** The long-term growth of the XDC Network may be influenced by the issuer's and the Foundation's ability to allocate technical, legal, and financial resources effectively.
		  ○ **Operational Integrity:**XinFin Fintech Pte. Ltd. and affiliated ecosystem participants must maintain adequate internal controls over exchange coordination, validator onboarding, token distribution, and public communications.

N	Field	Content
		• **Governance and Ecosystem Influence:** While validator-level consensus is decentralized, the issuer and its aligned entities maintain substantial influence over technical upgrades, validator incentives, and community grant policies. The transition to XDCDAO is expected to reduce this concentration, but as of the date of this whitepaper, governance remains largely off-chain and issuer-directed. • **Partnership and Infrastructure Dependencies:** Platforms such as TradeFinex, which facilitate real-world use cases in trade finance and supply chain tokenization, are significant use cases within the issuer's ecosystem strategy. Any failure of these platforms to reach commercial viability, or withdrawal of enterprise partners due to regulatory or strategic reasons, could undermine XDC's core utility proposition. • **Regulatory and Jurisdictional Risk:** XinFin Fintech Pte. Ltd. is incorporated in Singapore, where digital asset regulation is developing under frameworks such as the Payment Services Act and the Financial Services and Markets Act. Although crypto assets are currently treated with regulatory flexibility, future classification changes could result in licensing requirements, product restrictions, or compliance burdens. Furthermore, as the XDC token is available in global markets, it is exposed to jurisdictional variations in token classification (e.g., MiCA in the EU, securities law in the U.S.. Inconsistent regulatory approaches may create frictions.

I.3	Crypto-Assets- related Risks	• Market Risks:
		  ○ **Pricing Volatility:** XDC is subject to high market volatility. Its value may be influenced by speculative trading, overall sentiment in the digital asset sector, and macroeconomic events.
		  ○ **Liquidity Conditions:** Although XDC is listed on several centralized and decentralized trading platforms, its liquidity can vary significantly across jurisdictions and trading pairs.
		  ○ **Market Demand:** The utility of XDC is closely tied to XDC Networks' broader adoption within strategic verticals such as trade finance and RWA tokenization, as well as buildout of decentralized applications (DApps) and validator participation.
		  ○ **Concentration Risk:** Significant portions of XDC supply are held by ecosystem-aligned entities. Large token movements could impact market dynamics.

N	Field	Content
		• Regulatory Risks: ◦ **Jurisdictional Uncertainty:** Legal harmonisation issues across jurisdictions may result in legal uncertainty and inconsistent regulatory treatment. ◦ **Compliance Requirements:** Platforms supporting XDC may implement AML/CTF compliance obligations which may limit adoption in some jurisdictions. ◦ **Regulatory Actions:** Delistings, trading suspensions, or asset freezes may be imposed by competent authorities or trading platforms in response to legal challenges, sanctions compliance, or classification changes. These actions can impact access to the asset, particularly in regulated markets or custody solutions. • Operational Risks: ◦ **Private Key Management:** Holders must safeguard their private keys or seed phrases. The loss, theft, or mismanagement of these credentials results in permanent loss of the associated XDC tokens. No protocol-level recovery is possible. ◦ **Custodial Risks:** Users who delegate key management to centralized exchanges or third-party custodians are exposed to risks such as cyberattacks, insolvency, operational errors, or internal fraud. Losses in these scenarios may not be recoverable. ◦ **Irreversibility of Transactions:** XDC transactions are immutable. Once confirmed on-chain, they cannot be reversed or modified. Errors (e.g., sending to the wrong address) or transactions resulting from social engineering, fraud, or coercion are not rectifiable through the protocol. • Privacy and Taxation Risks: ◦ **Privacy Limitations:** XDC transactions are pseudonymous but not entirely anonymous. On-chain activity can be analyzed and potentially linked to real-world identities using blockchain forensics. ◦ **Tax Implications:** Transactions involving XDC may trigger capital gains, income taxes, or VAT, depending on the jurisdiction. • Broader Risks: ◦ **Macroeconomic Conditions:** Economic downturns, rising interest rates, or declines in investor appetite for digital assets may reduce demand. ◦ **Impact of Large Transactions or "Whales":** Large transactions from

N	Field	Content
		early holders, ecosystem funds, or validator wallets can affect price discovery. ○ **Interoperability Risks:** XDC's interoperability with other blockchains (e.g., via bridges or sidechains) introduces new dependencies and attack surfaces.
I.4	Project Implementation-Related Risks	• **Technical Delays and Quality Assurance:** The XDC Network requires ongoing development to maintain its performance, interoperability, and enterprise-readiness. Upgrades such as the rollout of XDPoS 2.0, introduction of validator staking tiers, and enhanced tokenomics require careful implementation. Delays may arise due to: ○ Technical complexity in protocol upgrades. ○ Resource constraints in engineering capacity. • **Dependency on Third Parties:** Although the XDC Network is public and decentralized at the consensus level, its development and adoption remain influenced by a group of key actors, including: ○ XinFin Fintech Pte. Ltd. (technical originator) ○ XDC Foundation (ecosystem steward) If any of these organizations fail to meet their obligations progress toward core milestones may be delayed • **Adoption by Users and Institutions:** While the success of technical upgrades depends on their ability to deliver improved functionality and reliability, their real-world impact also requires adoption by developers, node operators, and institutional users who build and use enterprise applications on the network. • **Community Support and Governance Transition:** The XDC Network is in the process of transitioning to community-led governance via the formation of XDCDAO. This shift aims to decentralize decision-making, but risks include low participation in governance grant fund misuse, administrative overload, decision-making delays, coordination issues and voter expertise gaps. • **Market Penetration and Competitive Positioning:** The blockchain landscape is highly competitive, with well-funded Layer 1 and Layer 2 protocols competing for enterprise adoption and developer mindshare. XDC's hybrid positioning offers unique benefits, but failure to communicate XDC's differentiation or achieve ecosystem stickiness could impact long-term utility and adoption.

N	Field	Content
		• **Human Resource Constraints:** The XDC ecosystem's technical advancement depends on a highly skilled pool of developers, security researchers, infrastructure operators, and integration partners. Talent risks include loss of key contributors, hiring issues and volunteer fatigue. While open-source momentum and existing partnerships provide continuity, competition for talent in the blockchain sector remains a strategic challenge.
I.5	Technology- Related Risks	• **Consensus and Network Integrity Risks:** The XDC Network's consensus mechanism relies on delegated proof of stake, so it inherits risks common to all PoS protocols: ○ **Nothing-at-Stake Risk:** In PoS systems, validators do not incur industrial-scale operational costs (e.g., electricity, hardware), potentially incentivizing malicious actors to sign multiple forks without penalty. On XDC, the separation of block production and verification adds nuances to this threat: a block creator could attempt to submit conflicting blocks, relying on timing or miscoordination to achieve a double-sign. Overall, this risk is significantly mitigated in the XDC Network through predetermined block producer rotation and Double Validation, which reduce the opportunity for equivocation. However, residual risks could theoretically remain in specific edge cases—such as during network partitions or latency-induced desynchronisation, in the event of validator collusion or Sybil attacks, if the validator selection randomness were biased, or due to implementation bugs or misconfigured clients. These scenarios are uncommon but not entirely impossible. ○ **Long-Range Attack Risk:** Because block finality in XDC is achieved when ≥75% of masternodes sign a block, a changeover in validator sets over time could theoretically create a risk that new validators cannot challenge fraudulent alternate chains created from earlier checkpoints. In such cases, adversaries could simulate a longer valid chain by rewriting historical blocks. While this is mitigated by checkpointing and quorum, a long-range attack remains a theoretical vulnerability in PoS-based finality chains. ○ **Censorship Risk via Validator Collusion:** If ≥75% of masternodes colluded or coordinated inactivity, they could theoretically be able to censor transactions or halt block production entirely. Although

N	Field	Content
		each validator must stake a minimum of 10 million XDC, the economic barrier does not fully preclude the possibility of cartel formation or coordinated inactivity. ○ **Centralization Risk in Block Creation:** Only designated masternodes can produce and validate blocks. If access to validator status became economically or operationally restricted to a small number of entities, or if delegation practices concentrate voting power, this may undermine decentralization and increase systemic fragility. This is a highly unlikely scenario but not theoretically impossible. • **Interoperability and Bridge Risks:** The XDC Network supports interoperability with external blockchains and enables cross-chain bridges. These functionalities introduce several security risks. ○ **Relay and Replay Attacks:**Relay attacks occur when an attacker reuses a signed transaction on multiple blockchains to deceive recipients or smart contracts into accepting previously executed transactions. This is particularly problematic in environments where blockchains use similar transaction formats or share identical chain IDs. The XDC Network supports EIP-155, which includes a unique chain ID in transaction signatures to reduce replay attacks. However, since chain IDs are integers and may overlap across forks or other chains, XinFin implements a more robust blockchain identifier to uniquely bind transactions to the XDC Network. This prevents replay attacks across chains and forks, ensuring secure cross-chain operations. • **Distributed Denial-of-Service (DDoS) Attacks:** XDC validator nodes are public-facing and must maintain high uptime to preserve network liveness. DDoS attacks targeting these nodes may: ○ Cause validators to miss block production or signature rounds. ○ Delay transaction finality or quorum formation. ○ Disrupt consensus if >25% of validators are simultaneously unreachable. While redundancy and cloud infrastructure reduce attack surface, targeted and coordinated attacks could impair block processing and lead to reputational damage.

N	Field	Content
		• **Spam and Mempool Flooding Attacks:** The XDC Network allows for extremely low transaction fees (as low as 1 wei), which makes it cost-efficient but also vulnerable to spam: ○ Attackers may fill blocks with low-value transactions, causing mempool congestion and denial of service to legitimate users. ○ Validators may prioritize high-fee transactions, but without dynamic fee scaling or minimum inclusion thresholds, spam may remain economically feasible. These limitations are in place for most blockchains. • **Connectivity and Validator Isolation Risk:** The XDC Network relies on active validator (masternode) participation to achieve quorum and finalize blocks. If a validator becomes isolated due to misconfiguration, network latency, or connectivity failure, it may be unable to produce or co-sign blocks. In such cases, block finality may be delayed, and prolonged isolation of multiple validators could impair network throughput or consensus safety. • **Validator Incentive Sustainability:** Although the XDC Network includes protocol-level block rewards and staking incentives, its long-term validator participation depends on sustained transaction volume and ecosystem growth. If usage declines, or if reward mechanisms are not adjusted to reflect validator costs, participation may decline, impacting consensus performance and decentralization.
I.6	Mitigation measures	The following mitigation measures are in place: • Issuer-Related Risks ○ **Token Supply and Allocation Governance:** While additional issuance takes place via block rewards, the pre-mine of 37.5 billion tokens assigns an important influence in the circulating supply to the structured schedules and allocation plans that govern ecosystem allocations, validator incentives, and foundation reserves. These mechanisms are designed to ensure long-term monetary predictability and to reduce the risk of market oversupply or inflationary dilution. Treasury Oversight and Ecosystem Funding: Funds supporting infrastructure development, validator participation, and community programs are managed by XinFin and affiliated entities under defined internal governance procedures. The transition toward

N	Field	Content
		○ **Decentralized Governance Transition:** Control over protocol upgrades, ecosystem grants, and key economic parameters is being progressively migrated to XDCDAO, a decentralized governance framework. ○ **Regulatory Monitoring and Geographic Compliance:** The issuer, XinFin Fintech Pte. Ltd., is headquartered in Singapore, a jurisdiction with well-defined digital asset regulations. The issuer maintains an active regulatory monitoring process across global frameworks, including MiCA (EU), FSMA (Singapore), and SEC (U.S.), and engages with licensed exchanges and custodians to ensure ongoing compliance alignment. ○ **Security Audits and Public Reporting:** The XDC protocol has undergone formal security assessments by CertiK and ChainSecurity, with public reports disclosing findings and corresponding remediation measures. ○ **Transparency and Stakeholder Communication:** Key developments, token allocation disclosures, and ecosystem progress updates are published through official XDC Foundation communication channels, GitHub repositories, and public blogs. This supports information parity across retail and institutional stakeholders and aligns with MiCA's transparency obligations. • Crypto-Asset-Related Risks ○ **Function-Driven Token Design:** XDC serves as the native token of the XDC Network. It is used to pay for gas fees, stake for validator participation, execute smart contracts, and facilitate settlement across decentralized and enterprise-grade platforms. This core function positions XDC as a non-financial crypto-asset under most regulatory frameworks, including MiCA, and reduces the credibility of speculative interpretations around regulatory risk. ○ **Structured Token Release Schedule:** Tokens allocated for validator rewards, infrastructure funding, and ecosystem development are released through predefined schedules rather than discretionary or market-based releases, so as to minimize supply shocks, discourage speculative manipulation, and enhance long-term stability. ○ **Economic Finality and Validator Incentive Alignment:** The XDC 2.0 upgrade introduced increased gas base fees (e.g., 50× adjustment) and a staking tier system, reinforcing the long-term

N	Field	Content
		sustainability of validator incentives. Validator rewards are issued through inflation-based epoch checkpoints, ensuring compensation is consistent and not tied to volatile fee markets. ○ **Institutional Integration and Compliance Enablement:** The network's architecture supports integration with regulated infrastructure, including KYC/AML-compliant platforms and enterprise deployment environments. Applications like TradeFinex are designed to function within global regulatory frameworks, promoting institutional-grade adoption of the XDC token. ○ **Wallet and Custody Support:** The XDC token is supported by a range of secure custody solutions, including hardware wallets, mobile applications, and integrations with institutional-grade custodians. These options help users and enterprise partners manage private keys safely and mitigate loss or theft risks associated with self-custody. ○ **Ecosystem Education and Technical Documentation:** The XDC ecosystem maintains a comprehensive library of documentation for developers, validators, and token holders, including developer portals, validator onboarding guides, and tokenomics explanations. These resources foster informed participation and help mitigate user-related operational risks, such as key mismanagement, misconfiguration, or incorrect staking behavior. • Project Implementation-Related Risks ○ **Transparent Roadmap Execution and Testing Infrastructure:** Major protocol milestones including the rollout of XDPoS 2.0, the validator staking framework, and tokenomics reforms—are publicly announced and implemented in phases. All updates are first deployed to the Apothem Testnet and XDCScan Devnet, allowing real-time testing, debugging, and community feedback. This staged process ensures network stability and significantly reduces the likelihood of mainnet disruptions due to code errors or misconfiguration. ○ **Formal Code Review and Audit Procedures:** Contributions to the core protocol are submitted through public GitHub repositories and subject to both internal review and, where applicable, third-party audits. Known vulnerabilities are addressed through structured patch releases. This ensures that protocol upgrades maintain high standards of security, consistency, and backward compatibility.

N	Field	Content
		○ **Ecosystem Coordination and Decentralized Execution:** Beyond the issuer (XinFin Fintech Pte. Ltd.), the XDC Network benefits from active support by the XDC Foundation, TradeFinex Tech Ltd., and other ecosystem stakeholders. These entities coordinate platform maintenance, enterprise integration, and developer outreach, reducing dependency on a single organization and strengthening operational redundancy. ○ **Grants, Collaboration, and Developer Support:** The ecosystem supports innovation through developer grants, community proposals, and open-source contributions. Public SDKs, RPC endpoints, toolkits, and educational resources are made available to facilitate DApp deployment, validator onboarding, and smart contract development. Funding for these initiatives is transitioning to on-chain governance via XDCDAO, ensuring transparent allocation and alignment with stakeholder priorities. ○ **Governance Transition to XDCDAO:** Control over key network parameters—including protocol upgrades, validator onboarding, and ecosystem funding—is being migrated to XDCDAO, a decentralized governance framework. This transition enhances long-term continuity, improves decentralization, and supports transparent, community-driven decision-making. ○ **Institutional Adoption and Strategic Partnerships:** The network's expansion into regulated markets is supported through partnerships with entities such as SBI VC Trade (Japan) and integration with enterprise platforms like TradeTrust. These relationships facilitate compliant real-world adoption and enhance the resilience of the XDC Network's institutional infrastructure. • Technology-Related Risks ○ **Nothing-at-Stake:** The XDC consensus enforces a predefined block production schedule per epoch. Since only one masternode may create a block at any time, arbitrary forks are structurally prevented. Furthermore, validation by ¾ of the 108 masternodes ensures it is computationally and procedurally unfeasible to validate forks without collusion. ○ **Long-Range Attacks:** A block is only finalized when ¾ of masternodes verify it. If no more than ¼ of validators are compromised, attackers cannot finalize an alternative chain.

N	Field	Content
		This quorum-based finality protects historical data integrity. ○ **Censorship Attacks:** Becoming a masternode requires a 10 million XDC stake, creating significant economic disincentive for collusion. In the extreme case where >75% of nodes become inactive or malicious, the network can be recovered through a protocol-level soft fork, reducing the validator set to restore functionality. ○ **Relay Attacks:** XDC supports EIP-155 and has extended it with a unique chain ID system to prevent the reuse of transaction signatures on forked or external chains. This defends against cross-chain replay attacks in multi-network environments. ○ **DDoS Attacks:** Masternodes are hosted on reputable cloud providers (AWS, Azure, GCP), all of which include robust DDoS mitigation services. The network remains operational as long as at least ¾ of validators are active and correctly functioning. ○ **Spam Attacks:** Although XDC supports very low transaction fees (minimum 1 wei), masternodes prioritize transactions by gas price, excluding low-fee spam transactions from proposed blocks. This mechanism preserves processing efficiency and bandwidth integrity.

Part J: Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts

Mandatory Information on principal adverse impacts on the climate

N	Field	Content
	General Information	
S.1	Name	XINFIN FINTECH PTE. LTD.
S.2	Relevant legal entity identifier	Unique Entity Number (UEN): 201718203Z
S.3	Name of the crypto-asset	XDC / XDC Token
S.4	Consensus Mechanism	XDPoS. See H.4.
S.5	Incentive Mechanisms and Applicable Fees	See H.5
S.6	Beginning of the period to which the disclosure relates	2025-01-01
S.7	End of the period to which the disclosure relates	2025-06-08
	Mandatory key indicator on energy consumption	
S.8	Energy consumption	192,784.37223 kWh per calendar year
	Sources and methodologies	
S.9	Energy consumption sources and methodologies	Data provided by the MiCA Crypto Alliance as a third party, with no deviations from the calculation guidance of Commission Delegated Regulation (EU) 2025/422, Article 6(5). Full methodology available at: https://www.micacryptoalliance.com/methodologies

Supplementary Information on the principal adverse impacts on the climate and other environment-related adverse impacts of the consensus mechanism

N	Field	Content
	Supplementary key indicators on energy and GHG emissions	
S.10	Renewable energy consumption	0.4181660799
S.11	Energy intensity	0.00070 kWh per transaction
S.12	Scope 1 DLT GHG emissions–controlled	0 t CO2eq per calendar year
S.13	Scope 2 DLT GHG emissions – purchased	55.72251 t CO2eq per calendar year
S.14	GHG intensity	0.00020 kg CO2eq per transaction
	Sources and methodologies	
S.15	Key energy course & methodologies	Data provided by the MiCA Crypto Alliance as a third party, with no deviations from the calculation guidance of Commission Delegated Regulation (EU) 2025/422, Article 6(5). Full methodology available at : https://www.micacryptoalliance.com/methodologies
S.16	Key GHG sources & methodologies	Data provided by the MiCA Crypto Alliance as a third party, with no deviations from the calculation guidance of Commission Delegated Regulation (EU) 2025/422, Article 6(5). Full methodology available at : https://www.micacryptoalliance.com/methodologies

Optional information on the principal adverse impacts on the climate and on other environment-related adverse impacts of the consensus mechanism

<table>
<tr><th>N</th><th>Field</th><th>Content</th></tr>
<tr><td colspan="3">Optional Indicators</td></tr>
<tr><td>S.17</td><td>Energy mix</td><td>
<table>
<tr><th>Energy source</th><th>Percentage {DECIMAL-11/10}</th></tr>
<tr><td>Bioenergy</td><td>0.0351047248</td></tr>
<tr><td>Coal</td><td>0.1453661512</td></tr>
<tr><td>Gas</td><td>0.2793330975</td></tr>
<tr><td>Hydro</td><td>0.1037896573</td></tr>
<tr><td>Nuclear</td><td>0.1294182587</td></tr>
<tr><td>Other fossil</td><td>0.0277164127</td></tr>
<tr><td>Other Renewables</td><td>0.0028706637</td></tr>
<tr><td>Solar</td><td>0.1361680498</td></tr>
<tr><td>Wind</td><td>0.1402329843</td></tr>
</table>
</td></tr>
<tr><td>S.19</td><td>Carbon intensity</td><td>0.28904 kg CO_2eq per kWh</td></tr>
<tr><td>S.22</td><td>Generation of waste electrical and electronic equipment (WEEE)</td><td>0.23258 t per calendar year</td></tr>
<tr><td>S.23</td><td>Non-recycled WEEE ratio</td><td>0.6049146935</td></tr>
<tr><td>S.24</td><td>Generation of hazardous waste</td><td>0.00012 t per calendar year</td></tr>
<tr><td>S.25</td><td>Generation of waste (all types)</td><td>0.23258 t per calendar year</td></tr>
<tr><td>S.26</td><td>Non-recycled waste ratio (all types)</td><td>0.6049146935</td></tr>
<tr><td>S.27</td><td>Waste intensity (all types)</td><td>0.00085 g per transaction</td></tr>
<tr><td>S.29</td><td>Impact of the use of equipment on natural resources</td><td>Land use: 5,140.41831 m^2</td></tr>
<tr><td>S.31</td><td>Water use</td><td>855.87541 m^3 per calendar year</td></tr>
<tr><td>S.32</td><td>Non-recycled water ratio</td><td>0.7501908606</td></tr>
</table>

N	Field	Content
		Sources and methodologies
S.33	Other energy sources and methodologies	Data provided by the MiCA Crypto Alliance as a third party, with no deviations from the calculation guidance of Commission Delegated Regulation (EU) 2025/422, Article 6(5). Full methodology available at: www.micacryptoalliance.com/methodologies
S.34	Other GHG sources and methodologies	Data provided by the MiCA Crypto Alliance as a third party, with no deviations from the calculation guidance of Commission Delegated Regulation (EU) 2025/422, Article 6(5). Full methodology available at: www.micacryptoalliance.com/methodologies
S.35	Waste sources and methodologies	Data provided by the MiCA Crypto Alliance as a third party, with no deviations from the calculation guidance of Commission Delegated Regulation (EU) 2025/422, Article 6(5).Estimates on individual node weight, hazardous components and deprecation rate are used. Full methodology available at: www.micacryptoalliance.com/methodologies
S.36	Natural resources sources and methodologies	Data provided by the MiCA Crypto Alliance as a third party, with no deviations from the calculation guidance of Commission Delegated Regulation (EU) 2025/422, Article 6(5). Usage of natural resources is approximated through land use metrics. Land use, water use and water recycling are calculated based on energy mix-specific estimates of purchased electricity land intensity, purchased electricity water intensity, and water recycling rates. Full methodology available at: www.micacryptoalliance.com/methodologies

MiCA Crypto Alliance

The MiCA Crypto Alliance is a leading collaborative initiative simplifying regulatory compliance across the crypto industry. We provide verified sustainability data and write MiCA-compliant white papers to help token issuers, CASPs and crypto projects meet their disclosure obligations under MiCA.

This alliance focuses on standardising compliance efforts among its members, offering exclusive resources like sustainability indicators and white paper elaboration tools tailored to meet MiCA requirements. By leveraging the collective expertise of its members, the MiCA Crypto Alliance will help reduce the complexities and costs associated with compliance, while setting a high standard for transparency, market integrity, and consumer protection.For more details on joining the MiCA Crypto Alliance.

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