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

Digital Token Identifier: **FRZQZJ7BL**
Offeror or person seeking admission to trading: **254900FXSZXTZUJLP764 - Plume Ltd**
Type of submission: **Correction**

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[Table 2] Template for white papers for crypto-assets other than asset-referenced tokens or e-money tokens

Template for white papers for crypto-assets other than asset-referenced tokens or e-money tokens [abstract]

General information

00 Table of content		true	
01 Date of notification		2026-03-18	
02 Statement in accordance with Article 6(3) of Regulation (EU) 2023/1114		This crypto-asset white paper has not been approved by any competent authority in any Member State of the European Union. The 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 paper is fair, clear and not misleading and the crypto-asset white paper makes no omission likely to affect its import.	
04 Statement in accordance with Article 6(5), points (a), (b), (c), of Regulation (EU) 2023/1114		The crypto-asset referred to in this crypto-asset white paper may lose its value in part or in full, may not always be transferable and may not be liquid	
05 Statement in accordance with Article 6(5), point (d), of Regulation (EU) 2023/1114		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.	

SUMMARY

07 Warning in accordance with Article 6(7), second subparagraph, of Regulation (EU) 2023/1114		Warning This summary should be read as an introduction to the crypto-asset white paper. The prospective holder should base any decision to purchase this crypto –asset on the content of the crypto-asset white paper as a whole and not on the summary alone. The offer to the public of this crypto-asset does not constitute an offer or solicitation to purchase financial instruments and any such offer or solicitation can be made only by means of a prospectus or other offer documents pursuant to the applicable national law. This crypto-asset white paper does not constitute a prospectus as referred to in Regulation (EU) 2017/1129 of the European Parliament and of the Council or any other offer document pursuant to Union or national law.	
08 Characteristics of the crypto-asset		Plume's crypto asset, $PLUME, is the native token of its ecosystem, fixed at a 10 billion supply. It serves as the network's transaction fee, governance medium and staking asset for securing operations and earning rewards. The token incentivises participation and engagement with decentralised finance applications, especially those involving real-world asset finance.	
09 Further information about utility tokens		$PLUME serves as a utility token within its ecosystem, enabling transaction execution, governance, staking and financial incentives. It is foundational to DeFi application interactions and the integration of real-world assets through tokenised forms.	
10 Key information about the offer to the public or admission to trading		The $PLUME token is available exclusively through exchange listings, with no public sale (IEO/IDO). It is currently listed on, among others, Binance, Bitvavo, UpBit, Bithumb, Bitkub, Coinbase, Digifinex, Kraken, HitBTC, Bybit, Bitget, Gate, MEXC, CoinTR and OSL Global.	

Part A - Information about offeror or person seeking admission to trading

A.1 Name		Plume Ltd	
A.2 Legal form		BVI business company limited by shares	
A.3 Registered address			
Registered addess		SHRM Trustees (BVI) Limited of Trinity Chambers, PO Box 4301, Road Town, Tortola, British Virgin Islands	
Country		Virgin Islands (British)	
Sub-division			
A.4 Head office			
Head office		SHRM Trustees (BVI) Limited of Trinity Chambers, PO Box 4301, Road Town, Tortola, British Virgin Islands	
Country		Virgin Islands (British)	
Sub-division			
A.5 Registration date		2024-05-01	
A.6 Legal entity identifier	*LEI*	254900FXSZXTZUJLP764	
A.7 Another identifier required pursuant to applicable national law		Registration number 2147684	
A.8 Contact telephone number		+1 (345) 325 9019	
A.9 E-mail address		legal@plumefoundation.io	
A.10 Response time (days)	*integer*	2	
A.11 Parent company		Plume Foundation SEZC	
A.12 Members of the management body			
Member #1		1	
Identity		Plume Foundation SEZC	
Business address		3rd Floor, Genesis Building, Genesis Close, PO Box 10035, George Town, Grand Cayman, Cayman Islands	
Function		Plume Foundation SEZC is the sole shareholder and sole director of Plume Ltd.	
A.13 Business activity		Plume Ltd is a wholly owned subsidiary of the Plume Foundation SEZC. Plume Ltd is responsible for the creation and distribution of the $PLUME token. The total supply is capped at 10 billion tokens, with allocations designated for community initiatives, ecosystem development, core contributors, early backers and Plume Foundation SEZC.	
A.14 Parent company business activity		Plume Foundation SEZC is an independent organisation dedicated to the mission of bringing the real world onchain. Plume Foundation SEZC supports the development and governance of the Plume RWA chain and ecosystem, which is purpose-built to bring a trillion dollar real-world asset market onchain, enabling Real World Asset Finance (RWAfi) for everyone. The growing ecosystem of contributors unites builders, community members, asset issuers, private credit funds, custodians and neobanks to create a full-stack solution for institutional-grade products accessible to anyone onchain. Plume Foundation SEZC's immediate priority is establishing a robust governance model that empowers the community with true ownership and shared responsibility in advancing the Plume mission.	
A.15 Newly established		true	
A.16 Financial condition for the past three years		As a new company, Plume Ltd does not have historical financial information spanning the past three years. Since incorporation, the financial condition of Plume Ltd has remained stable.	
A.17 Financial condition since registration		The Company was incorporated on 1 May 2024 and therefore does not yet have historical financial data for the preceding three financial years. Notwithstanding this, the Company is in a strong financial position. Its financial resources consist primarily of treasury reserves allocated to support the development of the Plume ecosystem and activities relating to the circulation of $PLUME. These resources are sufficient to support the Company's current and anticipated operational activities in its role as offeror of $PLUME. Given the Company's early stage of development, traditional financial performance indicators such as EBITDA, net margin or return on investment are not currently the primary metrics used to assess its financial condition. Instead, the Company assesses its financial stability primarily by reference to the size and composition of its treasury reserves, its operational runway relative to expected expenditures and broader indicators of ecosystem development.	

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

B.1 Issuer different from offerror or person seeking admission to trading		false	
B.2 Name	N/A		
B.3 Legal form		N/A	
B.4 Registered address			
Registered address		N/A	
Country		N/A	
Sub-division		N/A	
B.5 Head office			
Head office		N/A	
Country		N/A	
Sub-division		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			
Member #1		N/A	
Identity		N/A	
Business address		N/A	
Function		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

C.1 Name		N/A	
C.2 Legal form		N/A	
C.3 Registered address			
Registered address		N/A	
Country		N/A	
Sub-division		N/A	
C.4 Head office			
Head office		N/A	
Country		N/A	
Sub-division		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 the management body			
Member #1		N/A	
Identity		N/A	
Business address		N/A	
Function		N/A	
C.11 Operator business activity		N/A	
C.12 Parent company business activity		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 6(1), second subparagraph, of Regulation (EU) 2023/1114		N/A	

Part D - Information about other token project

D.1 Crypto-asset project name		Plume	
D.2 Crypto-asset name		$PLUME	
D.3 Abbreviation		PLUME	
D.4 Crypto-asset project description		Plume is an ecosystem-driven Layer-1 network built around real-world asset finance (RWAfi). It focuses on integrating new crypto-first RWA use cases beyond traditional finance, leveraging blockchain technology for asset tokenisation and DeFi applications. A vibrant community and strategic partnerships foster ecosystem resilience.	
D.5 Details of all natural or legal persons involved in implementation of crypto-asset project			
Person #1		1	
Type of person		Other person involved in implementation	
Name of person		Plume Holdings Ltd	
Business address of person		Trinity Chambers, PO Box 4301, Road Town, Tortola, British Virgin Islands	
Domicile of company		Virgin Islands (British)	
Person #2		2	
Type of person		Other person involved in implementation	
Name of person		Plume Foundation SEZC	
Business address of person		3rd Floor, Genesis Building, Genesis Close, PO Box 10035, George Town, Grand Cayman, Cayman Islands	
Domicile of company		Cayman Islands	
Person #3		3	
Type of person		Crypto-asset service provider	
Name of person		Kimber Labs, Inc.	
Business address of person		1111B S Governors Ave STE 26730, Dover, DE 19904, USA	
Domicile of company		United States of America	
D.6 Utility token classification		true	
D.7 Key features of goods or services for utility token projects		$PLUME serves multiple functions within the Plume ecosystem including: *Gas Fees: used for transaction fees on the Plume Network; *Governance: enables holders to participate in network decision-making processes; *Staking: allows users to stake tokens, contributing to network security and earning rewards; and *Ecosystem Incentives: rewards for participating in community activities, quests and referrals.	
D.8 Plans for the token			
Description of past milestones		The $PLUME token launched on 21 January 2025 with subsequent token exchange listings and airdrop programs. Plume Mainnet launch occurred on 5 June 2025. Recent milestones include DA and rollup upgrades.	
Description of future milestones		Remaining work focuses on decentralisation, governance tooling, RWA product integrations and continuing feature rollouts.	
D.9 Resource allocation		59% of $PLUME tokens are for ecosystem growth and development, 41% for early contributor rewards, with tokenomics fostering active network participation and service development. These allocations drive enhancements in DeFi and RWA integration.	
D.10 Planned use of collected funds or other tokens		Funds are primarily allocated towards expanding the ecosystem, supporting partnerships, developing DeFi solutions and incentivising tokenisation ventures across the Plume network.	

Part E - Information about offer to public of other tokens or their admission to trading

E.1 Public offering or admission to trading		Admission to trading	
E.2 Reasons for public offer or admission to trading		The primary reason for seeking admission of $PLUME to trading is to enhance accessibility and liquidity for market participants. Admission facilitates the development of a secondary market, enabling price discovery and providing broader opportunities for both retail and professional investors to engage with the token. This broader market access is expected to contribute to overall ecosystem growth, increase utility and promote further adoption of the Plume ecosystem. Resources already allocated to the project are primarily committed to ecosystem growth and development, incentivising user participation, supporting the expansion of real-world asset finance products and fostering integration with DeFi applications. The largest portion of the $PLUME supply is dedicated to these activities, with allocations emphasising ongoing technical and ecosystem advancement. No fundraising target, minimum or maximum subscription goals, or specific phases relating to the collection of proceeds are described for the offer, and there is no indication of funds or crypto-assets being raised directly in connection with the admission to trading. Plume Network's $PLUME token is available exclusively through exchange listings, with no public sale (IEO/IDO).	
E.3 Fundraising target			
Target expressed in currency			EUR
Target expressed in units			
Target expressed in digital token identifier			
E.4 Minimum subscription goals			
Goals expressed in currency			EUR
Goals expressed in units			
Goals expressed in digital token identifier			
E.5 Maximum subscription goals			
Goasl expressed in currency			EUR
Goals expressed in units			
Goals expressed in digital token identifier			
E.6 Oversubscription acceptance		false	
E.7 Oversubscription allocation		N/A	
Issue price details			
E.8 Issue price	*decimal*		
E.9 Official currency determining issue price			
E.9 Any other tokens determining issue price		N/A	
E.10 Subscription fee			
Fee expressed in currency	*monetary*		EUR
Fee expressed in units	*decimal*		
Fee expressed in digital token identifier		N/A	
E.11 Offer price determination method		N/A	
E.12 Total number of offered or traded other tokens	*integer*	10000000000	
E.13 Targeted holders		Retail investors	
E.14 Holder restrictions		N/A	
E.15 Reimbursement notice			
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		false	
E.21 Subscription period beginning			
E.22 Subscription period end			
E.23 Safeguarding arrangements for offered funds or other tokens		N/A	
E.24 Payment methods for other token purchase		N/A	
E.25 Value transfer methods for reimbursement		N/A	
E.26 Right of withdrawal		N/A	
E.27 Transfer of purchased other tokens		N/A	
E.28 Transfer time schedule		N/A	
E.29 Purchaser's technical requirements		N/A	
Other token services provider characteristics			
E.30 Other token service provider (CASP) name		N/A	
E.31 CASP identifier	*LEI*		
E.32 Placement form		Not applicable	
Trading platforms characteristics			
E.33 Trading platforms name		$PLUME is currently listed on the following exchange: Binance, Bitvavo, UpBit, Bithumb, Bitkub, Coinbase, Digifinex, Kraken, HitBTC, Bybit, Bitget, Gate, MEXC, CoinTR and OSL Global	
E.34 Trading platforms market identifier code (MIC)		Of the trading platforms $PLUME is listed on, the following have a MIC: Bitvavo: VAVO Kraken: PESL	
E.35 Trading platforms access		Investors access platforms by verifying identity, funding accounts and using platform interfaces. Trading involves processing fees, currency conversions and deposit/withdrawal charges. Detailed guides assist users in navigating trades and providing notice to purchasers of the various fees involved.	
E.36 Involved costs		Costs may include trading fees, deposit/withdrawal fees, conversion fees and network charges, which vary by platform and payment method. Investors should review fee schedules for specific expenses.	
E.37 Offer expenses		N/A	
E.38 Conflicts of interest		There are no potential conflicts of interest of the persons involved in the admission to trading, arising in relation to the admission to trading.	
E.39 Applicable law		British Virgin Islands	
E.40 Competent court		British Virgin Islands	

Part F - Information about other tokens

F.1 Crypto-asset type		$PLUME is classified as an "other crypto-asset" under the Markets in Crypto-Assets Regulation (EU) 2023/1114 (MiCA), as it does not qualify as an asset-referenced token or an e-money token. $PLUME is a utility token designed for use within the Plume ecosystem. It supports real-world asset finance (RWAfi) and provides access to various decentralised finance applications and network functions including governance and transaction processing.	
F.2 Other token functionality		$PLUME token is essential for conducting transactions within Plume's ecosystem, engaging in on-chain governance and earning staking rewards. It interacts with decentralised finance applications and facilitates access to tokenised real-world assets.	
F.3 Planned application of functionalities		Governance through on-chain voting and participating in the ecosystem via yield incentives will be available immediately following public Mainnet launch. Staking functionality will be available later this year.	
A description of the characteristics of the other token, 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		Other crypto-asset token white paper	
F.5 Type of submission		Correction	
F.6 Other token characteristics		$PLUME is a fixed supply, fungible cryptographic token representing transferable value within the Plume Network ecosystem. The total supply is capped at 10,000,000,000 units. $PLUME is used for transaction fees, staking incentives, validator rewards, participation in ecosystem governance and access to real-world asset finance products. Holders can contribute to protocol governance through proposals and voting on network parameters, upgrades and key ecosystem initiatives. The consensus mechanism employed is delegated proof of stake (DPoS), with validators and delegators participating for network security and efficiency. Penalties may apply for validator misbehavior according to protocol rules. Transaction fees collected in $PLUME support network security and ecosystem operations. There is no ongoing minting or inflation; no burn mechanism is implemented for supply adjustment. The token is fully interoperable across supported Layer 1 and Layer 2 blockchains via integrations with partners including LayerZero, Hyperlane, DeBridge, and Relay, facilitating cross-chain asset movement and liquidity. Scalability is addressed through network architecture designed for increased throughput and efficient settlement of on-chain asset transactions, supporting subnets and network modularity for performance optimisation. Ecosystem incentive mechanisms include staking rewards, grants for protocol development, and user programs to drive adoption and developer participation. $PLUME is designed to underpin the Plume Network's infrastructure for real-world asset tokenisation and decentralised finance applications.	
F.7 Commercial name or trading name		Plume Ltd	
F.8 Website of the issuer		https://plume.org/	
F.9 Starting date of offer to the public or admission to trading		2025-01-25	
F.10 Publication date		2025-05-19	
F.11 Any other services provided by the issuer		N/A	
F.12 Language or languages of 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		FRZQZJ7BL	
F.14 Functionally fungible group digital token identifier, where available		N/A	
F.15 Voluntary data flag		true	
F.16 Personal data flag		true	
F.17 LEI eligibility		true	
F.18 Home member state		Netherlands	
F.19 Host member states #1		Netherlands	

Part G - Information on rights and obligations attached to other tokens

G.1 Purchaser rights and obligations		Purchasers are entitled to own $PLUME tokens, engage in governance, participate in staking and yield generation, and utilise the tokens for accessing various ecosystem services. They must comply with all relevant laws, follow the terms of service, and are responsible for paying any transaction and platform fees.	
G.2 Exercise of rights and obligations		Token holders must use network features to exercise rights, such as voting in governance processes, engaging in staking for rewards and participating in DeFi applications. These require a sufficient balance of $PLUME, with additional conditions for staking, governance and transaction fees.	
G.3 Conditions for modifications of rights and obligations		Rights and obligations attached to $PLUME may be modified through the established network governance process. Modifications can be proposed by eligible participants according to protocol rules and are subject to community voting by token holders, validators, or delegated representatives. Changes may pertain to network parameters, protocol upgrades, or amendment of key terms that affect $PLUME holders or network operation. Notice of any proposed modification is provided on designated governance forums and official communication channels prior to the voting process. All eligible holders can participate or delegate voting power according to the mechanics defined in network documentation. Modifications are implemented following affirmative vote outcomes and are executed on-chain, ensuring update transparency and verifiability. In circumstances involving issuer insolvency or material financial distress at Plume Ltd, rights and obligations related to $PLUME may be impacted by disruption of operational support, loss of access to governance participation, or changes imposed by insolvency administration. The risk exists that proposed modifications in such a scenario may reflect priorities of administrators or legal authorities, and not necessarily those of prior holders or network participants.	
G.4 Future public offers		Currently, there are no scheduled public offers of $PLUME by Plume Ltd. While there are no plans for public funding rounds, any potential future offers would be compliant with prevailing regulations and include detailed communication via official channels.	
G.5 Issuer retained other token	*integer*	4666554520	
G.6 Utility token classification		true	
G.7 Key features of goods or services utility tokens		$PLUME tokens enable access to essential services within the Plume ecosystem, such as transaction processing, staking for rewards, governance participation, and interactions with decentralised finance applications incorporating RWA elements. These facilitate a comprehensive user experience designated in Plume's ecosystem tailored for crypto-native participants.	
G.8 Utility tokens redemption		$PLUME can be used within the Plume Network to access a range of services and products related to real-world asset finance. Token holders may redeem $PLUME for transaction fees required to issue or transfer tokenised assets on-chain and to participate in protocol governance and staking activities. $PLUME is also accepted for participation in ecosystem-sponsored programs, integration fees, and potential access to yield-bearing asset vaults, as specified in the network documentation. Vendors, institutional asset managers, and participants within the Plume Network infrastructure may accept $PLUME as payment or enable redemption for specific utilities, including access to on-chain asset management and related services. Redemption is executed directly through supported interfaces and partner integrations, subject to availability of relevant services and fulfilment of any eligibility requirements or technical conditions as detailed by the service provider or protocol documentation.	
G.9 Non-trading request		true	
G.10 Other tokens purchase or sale modalities		N/A	
G.11 Other tokens transfer restrictions		Transferability restrictions include jurisdictional limits, compliance with KYC/AML procedures, and potential lock-ups as dictated by exchanges or regulatory requirements, ensuring adherence to legal standards and platform security.	
G.12 Supply adjustment protocols		false	
G.13 Supply adjustment mechanisms		N/A	
Other token schemes details			
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		British Virgin Islands	
G.19 Competent court		British Virgin Islands	

Part H – Information on underlying technology

H.1 Distributed ledger technology (DTL)		Plume operates on the Arbitrum Orbit stack, a Layer-2 blockchain technology that settles transactions to Ethereum for enhanced security and transparency. This setup enables scalability, decentralised application support and resistance to manipulation.	
H.2 Protocols and technical standards		Plume Network uses ERC-20 standards for $PLUME, allowing compatibility with Ethereum-based platforms and supports custody via non-custodial wallets and custodial providers. Secure cryptography, key and asset management, and interoperability with various chains ensure safe transfer and storage, facilitated by trusted custody solutions.	
H.3 Technology used		$PLUME integrates features for scalability, security, and interoperability, including tokenisation and data integration platforms, cross-chain yield solutions, and secure smart wallets to enhance ecosystem capabilities.	
H.4 Consensus mechanism		Plume uses a consensus mechanism based on optimistic rollups within the Arbitrum Orbit stack, involving a sequencer that initially orders transactions before finality is ensured on the Ethereum mainnet. Economic incentives encourage fraud proof submission within predetermined windows.	
H.5 Incentive mechanisms and applicable fees		Incentive mechanisms ensure active network security and reliability, with sequencers and validators receiving transaction fees as rewards. $PLUME tokens also provide earning opportunities through staking and DeFi engagement, encouraging community participation and ecosystem stability.	
H.6 Use of distributed ledger technology		false	
H.7 DLT functionality description		N/A	
Other token audit details			
H.8 Audit		true	
H.9 Audit outcome		All completed technology audits relating to Plume are publicly available here: https://docs.plume.org/plume/plume-security/audits-and-security. All findings are deemed acceptable within industry standards or have been remediated. The codebase conforms to best practices in secure smart contract development.	

Part I - Information on risks

I.1 Offer-related risks		Purchasing $PLUME involves standard risks associated with investing in any crypto-asset, including: (1) Market Volatility: Prices can fluctuate significantly, leading to rapid gains or losses. (2) Security Risks: Crypto-assets may be vulnerable to hacking. Licensed payment processor or exchange may be hacked leading to a loss of personal data of $PLUME token holders. (3) Liquidity Risks: Some tokens may have limited liquidity, depending on where the token is traded, affecting trade execution. (4) Operational Risks: Exchange reliability and platform security can impact asset accessibility.	
I.2 Issuer-related risks		(1) Financial & Business Risks: Adoption and liquidity growth are crucial for long-term sustainability. The RWA finance sector is emerging, with regulatory and competitive uncertainties. * Mitigant: In 2024, Plume raised a total of $30M in funding from leading investors like Galaxy Digital, Haun Ventures, Brevan Howard, Lightspeed Faction, etc. * Mitigant: The RWA sector is growing rapidly with various tailwinds over the last several years. * Mitigant: 180+ projects building with us; $4B+ in assets to be tokenized; $500M in capital committed * Mitigant: Plume has key partners in the RWA space: - Institutional Partners (partners who intend to tokenise their money market fund, private credit fund, or yield bearing assets on Plume) - WisdomTree, Libre, Fullerton, Ondo, Apollo Global Management - Enterprise Partners (partners who intend to deploy their infrastructure/stablecoin product on Plume) - Securitize / sBUIDL, PayPal/Trident Digital, Paxos, M^0, Mountain - Capital Partners (partners who intend to deploy capital into Plume assets or vaults) - Galaxy Digital, Hashkey, Brevan Howard, Hyperithm, Lightspeed Faction, SIG, GSG, Anchorage - Emerging Market Partners (partners, primarily neobanks, who intend to integrate their customers and products with Plume's yield bearing products) - BlackOpal, Dinari, Mercado Bitcoin, OpenTrade, Busha, Endl, Enterprise Alliances and Coalitions, Enterprise Ethereum Alliance, Token 3643, Token Asset Coalition, Custody Solution Partners, Anchorage, Fireblocks - Wallet Partnerships (both earn / RWA staking and user growth initiatives) - Bitget Wallet, OKX Wallet, Binance Wallet (2) Regulatory & Legal Risks: Plume Ltd's operations are affected by changes in international and local regulations regarding crypto-assets. This includes securities law, money transmission statutes, sanctions, tax law, and consumer protection measures. Compliance with regulatory changes could restrict distribution, limit trading, require adaptation of platform features, or impact other aspects of operations. Personal data is collected as part of user onboarding and compliance. Data breaches or misuse could create privacy risks for users subject to KYC/AML requirements. * Mitigant: Regulatory environment particularly in the US is favorable for crypto-focused businesses. * Mitigant: Plume also takes proactive steps to keep in step with changing regulations by leveraging licenses of our partners. (3) Third-Party Risks: The project leverages external technology and integration partners (e.g., Circle, LayerZero, Hyperlane, DeBridge, Relay) for interoperability with other blockchains. If a partner fails operationally or technically, this may impact bridging, token flows, or user access to $PLUME across networks, potentially leading to reduced liquidity or loss scenarios. (4) Market Risks: Trading of $PLUME occurs predominantly on centralised exchanges. Market risks include price volatility, liquidity limitations, and possible delistings. Fluctuations may be rapid and unpredictable, resulting in significant gain or loss of value for token holders. (5) Internal Controls & Security Risks: Operational and platform security is necessary to prevent hacking or unauthorized access. Breaches at the exchange or protocol level may result in theft or permanent loss of $PLUME holdings. Management of token distribution, treasury, and network operations are internal processes. Weaknesses in internal controls may result in erroneous transactions, unauthorised transfers, or loss of token holder confidence.	
I.3 Other tokens-related risks		Purchasing $PLUME involves standard risks associated with investing in any crypto asset, including: (1) Market Volatility: Prices can fluctuate significantly, leading to rapid gains or losses. (2) Security Risks: Crypto-assets may be vulnerable to hacking. (3) Liquidity Risks: Some tokens may have limited liquidity, depending on where the token is traded, affecting trade execution. (4) Platform and Holder Risks: Exchange reliability, custody and platform security, and the possibility of trading disruptions or delisting events can impact asset accessibility. Inadequate adoption at scale or low trading interest could lead to lower volumes, greater slippage, or decreased liquidity, which may affect the tradability and perceived utility of the token. (5) Blockchain Technology Risk: $PLUME operates on the Plume Network, where the token's value, tradability, and utility depend on operational stability, security protocols, and technical infrastructure. Plume is dependent on Arbitrum and Ethereum as underlying blockchains. Technological vulnerabilities, failures, protocol upgrades, or disruptions may impact transaction processing, governance, staking mechanisms, or yields attributed to token participation. (6) Reputational Risk: Negative developments such as regulatory actions, failure to deliver on the project roadmap, or adverse publicity affecting the Plume Network or its governance, could adversely affect the desirability, liquidity, utility, or price of $PLUME.	
I.4 Project implementation-related risks		Key risks include delays in technology deployment, ecosystem growth challenges, compliance with regulatory changes, and operational obstacles concerning partnerships and network upgrades. Continuous innovation, regulatory engagement, and stakeholder incentives mitigate these risks.	
I.5 Technology-related risks		The top risks associated with the technology used in Plume Network: (1) Smart Contract Vulnerabilities: Despite extensive testing, smart contracts could have bugs or security vulnerabilities that hackers may exploit, compromising the network's integrity. (2) Cross-Chain Security: Plume's multi-chain interoperability introduces risks related to security breaches in cross-chain bridges, which could result in asset loss or exploitation. (3) Network Throughput and Efficiency: If the Plume blockchain experiences congestion, technical failures, or speed limitations, delays or failures in transaction processing could occur, impacting user experience and the timely redemption or utilisation of $PLUME. In the event of a protocol divergence among node operators or validators (e.g. "hard fork"), users could encounter incompatible versions of the token, double-spending risks, or loss of value and utility.	
I.6 Mitigation measures		Plume Network employs several mitigation measures to address the risks associated with its technology: (1) Smart Contract Audits and Bug Bounties: To minimise vulnerabilities, Plume conducts regular third-party audits of its smart contracts and has a bug bounty program to encourage the discovery of potential issues before they can be exploited. (2) Cross-Chain Security Protocols: Plume uses established, secure cross-chain protocols like LayerZero for interoperability and continuously monitors and strengthens the security of its bridges to protect assets during cross-chain transactions. (3) Network Level Anti-Money Laundering (AML) Technology: Plume integrates AML screening to prevent access to the network for wallets identified as having a high risk of involvement with money laundering or connected to OFAC SDNs (Specifically Designated Nationals and Blocked Persons). (4) Cryptographic Standards Deployed: Plume is built on Arbitrum Orbit, which inherits the same cryptographic foundations as the largest smart contract platform ever, Ethereum. Every transaction batch and state root is hashed using Keccak-256, the same 256-bit hash function used by Ethereum. Account and validator keys use the secp256k1 elliptic curve ECDSA scheme, the same key management model used by Ethereum. The security of the chain is cryptoeconomically guaranteed by the BoLD dispute game, which settles the veracity of a fraud proof using an interactive Merkle-proof-based dispute protocol executed onchain. (5) Scalability and Congestion Mitigation: Plume works with Conduit, the leading high-performance Rollup-as-a-Service provider for Arbitrum Orbit chains, which has deployed the highest-performance Arbitrum Orbit chains such as Proof of Play and Xchain by using horizontally scalable, multiple-redundancy infrastructure with automatic failover across multiple availability zones on Google Cloud. Plume has thoroughly load tested Conduit's scalability infrastructure and determined it can reach a peak of over 100 Mgas/s. Furthermore, Conduit's scalable RPC infrastructure uses load balancers that can handle billions of requests per day. (6) Backup and Recovery Systems: Plume works with Conduit, whose infrastructure is automatically backed up on Google Cloud multiple times a day and tested for backup recovery and adherence to proper backup procedures regularly. Because Plume's validator set is globally distributed, there is no risk of any data loss as it is statistically improbable that every single validator across the world dies simultaneously. (7) Real-Time Monitoring Tools: Plume works with Conduit, whose team of 24/7 oncall site reliability engineers constantly monitors the chain for any performance issues, security vulnerabilities, and user impact, using industry standard monitoring and bug tracking platforms like Grafana and Sentry. Plume also works with third-party monitoring companies like Forta, Predicate, and Hypernative, which monitor transactions on the chain for fraudulent or illicit activity, as well as suspicious activity which could lead to hacks or scams. (8) Formal Governance Safeguards: No protocol or chain-level changes can be made to Plume's software, services, or chain without explicit authorisation by Plume Foundation SEZC, preventing any governance-related issues that might result in harmful protocol changes.	

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

J.1 Adverse impacts on climate and other environment-related adverse impacts		The Plume Network is an early-stage Layer-2 network that settles transactions on Ethereum. The network operates using shared cloud infrastructure and periodically posts transaction batches to Ethereum for settlement. Based on best-effort estimates derived from infrastructure telemetry and publicly available estimates of Ethereum transaction energy consumption, total electricity consumption associated with the operation of the network is estimated to be approximately 3,033 kWh per year. This estimate includes both (i) Layer-2 infrastructure energy consumption and (ii) Layer-1 settlement transactions posted to Ethereum. Layer-2 infrastructure is hosted on Google Cloud Platform and deployed through Kubernetes clusters. Energy consumption for these components is estimated using a Cloud Carbon Footprint–style methodology, allocating energy based on observed CPU utilization metrics from cluster monitoring systems. Based on observed workload utilization, the estimated annual electricity consumption of the Layer-2 infrastructure is approximately 1,455.74 kWh per year. In addition, the network periodically posts batches of transactions to Ethereum for data availability and settlement. Under the current configuration, batches are submitted approximately every ten minutes, corresponding to an estimated 52,560 settlement transactions per year. Using a commonly cited post-Merge estimate of approximately 0.03 kWh per Ethereum transaction, the estimated annual electricity consumption associated with settlement transactions is approximately 1,576.8 kWh per year. The resulting estimated total annual electricity consumption is approximately 3,033 kWh. These values represent best-effort estimates derived from available infrastructure telemetry and publicly available estimates of Ethereum transaction energy consumption and should be interpreted as indicative rather than precise measurements.	

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

General information about adverse impacts			
S.1 Name		Plume Ltd	
S.2 Relevant legal entity identifier		254900FXSZXTZUJLP764	
S.3 Name of the crypto-asset		$PLUME	
S.4 Consensus mechanism		Plume uses a consensus mechanism based on optimistic rollups within the Arbitrum Orbit stack, involving a sequencer that initially orders transactions before finality is ensured on the Ethereum mainnet. Economic incentives encourage fraud proof submission within predetermined windows.	
S.5 Incentive mechanisms and applicable fees		Incentive mechanisms ensure active network security and reliability, with sequencers and validators receiving transaction fees as rewards. $PLUME tokens also provide earning opportunities through staking and DeFi engagement, encouraging community participation and ecosystem stability.	
S.6 Beginning of period to which disclosed information relates		2026-01-01	
S.7 End of period to which disclosed information relates		2026-01-31	
Mandatory key indicator			
S.8 Energy consumption	*energy (kWh)*	3033	
Sources and methodologies			
S.9 Energy consumption sources and methodologies		Energy consumption includes two components: 1. Layer-2 infrastructure Infrastructure (single sequencer) supporting the network operates on Google Cloud Platform and is deployed on Kubernetes clusters (GKE). Energy consumption is estimated using a Cloud Carbon Footprint–style methodology, allocating energy based on observed CPU utilization metrics rather than total cluster capacity. Cluster telemetry is derived from the GCP metrics system, which exposes Prometheus-compatible metrics. Energy is calculated at the cluster level and proportionally distributed to the namespaces running network workloads. Annualized estimates based on January 2026 utilisation: Mainnet: ~1,231 kWh/year Testnet: ~224.74 kWh/year 2. Layer-1 settlement transactions The network posts transaction batches to Ethereum. Under the current configuration: Batch interval ≈ 10 minutes Batches per year ≈ 52,560 Energy associated with these settlement transactions is estimated using a commonly cited estimate of ~0.03 kWh per Ethereum transaction. Estimated annual settlement energy: ~1,576.8 kWh/year *This estimate is approximate and based on publicly available post-Merge energy intensity estimates for Ethereum transactions.	

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

Supplementary key indicators			
S.10 Renewable energy consumption	*percent*	100%	
S.11 Energy intensity	*energy (kWh)*		
S.12 Scope 1 DLT GHG emissions - controlled	*GHG emissions (tCO2e)*	0	
S.13 Scope 2 DLT GHG emissions - purchased	*GHG emissions (tCO2e)*	1.15tCO$_2$e/year	
S.14 GHG intensity	*GHG emissions (tCO2e)*	0.38kgCO$_2$/kWh	
Sources and methodologies			
S.15 Key energy sources and methodologies		Energy consumption includes two components: Layer-2 infrastructure and Layer-1 settlement transactions. Layer-2 infrastructure runs on Google Cloud Platform using Kubernetes (GKE). Energy estimates follow a Cloud Carbon Footprint–style methodology, allocating energy based on CPU utilization metrics from cluster monitoring (Prometheus-compatible telemetry) and proportionally attributing cluster-level consumption to workloads. Layer-1 settlement energy is estimated from transaction batches posted to Ethereum. The estimate assumes an average batch frequency of ~10 minutes (~52,560 transactions per year) and an approximate post-Merge energy estimate of ~0.03 kWh per Ethereum transaction. All figures represent best-effort estimates based on available infrastructure telemetry and publicly available Ethereum energy estimates.	
S.16 Key GHG sources and methodologies		GHG emissions arise from electricity used for cloud infrastructure and Layer-1 settlement transactions. Scope 1 emissions are zero, as the network does not operate physical hardware. Scope 2 emissions are estimated by applying a representative grid carbon intensity factor (~0.38 kgCO$_2$e/kWh) to total electricity consumption. Emissions from Layer-1 settlement are estimated using the same carbon intensity factor applied to the estimated energy consumption of Ethereum batch transactions. All emissions values represent best-effort estimates based on available infrastructure telemetry, regional electricity carbon intensity data, and public estimates of Ethereum transaction energy usage.	

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

Optional indicators			
S. 17 Energy mix	*percent*		
S.18 Energy use reduction			
Energy use reduction target (absolute value)	*energy (kWh)*		
Energy use reduction target (percentage)	*percent*		
S.19 Carbon intensity (kgCO2e/kWh)	*decimal*		
S.20 Scope 3 DLT GHG emissions - value chain	*GHG emissions (tCO2e)*		
S.21 GHG emissions reduction targets or commitments			
S.22 Generation of waste electrical and electronic equipment (WEEE)	*mass (tonnes)*		
S.23 Non-recycled WEEE ratio	*percent*		
S.24 Generation of hazardous waste	*mass (tonnes)*		
S.25 Generation of waste (all types)	*mass (tonnes)*		
S.26 Non-recycled waste ratio (all types)	*percent*		
S.27 Waste intensity (all types)	*mass (tonnes)*		
S.28 Waste reduction targets or commitments (all types)			
S.29 Impact of use of equipment on natural resources			
S.30 Natural resources use reduction targets or commitments			
S.31 Water use	*volume (m3)*		
S.32 Non recycled water ratio	*percent*		
Sources and methodologies			
S.33 Other energy sources and methodologies			
S.34 Other GHG sources and methodologies			
S.35 Waste sources and methodologies			
S.36 Natural resources sources and methodologies			