

Quantoz Payments B.V.

EURD EMT White Paper

(Articles 51 to 53 of [MiCAR regulation](#))

This white paper was notified to *De Autoriteit Financiële Markten* (AFM) on 1 August 2024 and subsequently published on 18 September 2024. The latest modified white paper was notified to the AFM on 22 August 2025 and subsequently published on 22 September 2025.

Nr.	Field	Content
I.00	Table of content	I.01 – Date of notification I.02 – Statement in accordance with Article 51(3) of Regulation (EU) 2023/1114 I.03 – Compliance statement in accordance with Article 51(5) of Regulation (EU) 2023/1114 I.04 – Warning in accordance with Article 51(4), points (a) and (b) of Regulation (EU) 2023/1114 EXECUTIVE SUMMARY I.05 – Warning in accordance with Article 51(6), second subparagraph of Regulation (EU) 2023/1114s I.06 – Characteristics of the crypto-asset I.07 – Right of redemption I.08 – Key information about the offer and or admission to trading PART F - RISKS F.1 – Issuer-Related Risks F.2 – Token-Related Risks F.3 – Technology-Related Risks F.4 – Mitigation measures PART A - INFORMATION ABOUT THE ISSUER OF THE E-MONEY TOKEN A.1 – Statutory Name A.2 – Trading Name A.3 – Legal form

		A.4 – Registered Address A.5 – Head office A.6 – Registration Date A.7 – Legal entity identifier A.8 – Company Registration Number A.9 – Contact telephone number A.10 – E-mail address A.11 – Response Time (days) A.12 – Parent Company A.13 – Members of the management body A.14 – Business Activity A.15 – Parent Company Business Activity A.16 – Conflicts of Interest Disclosure A.17 – Issuance of other crypto-assets A.18 – Activities related to other crypto-assets A.19 – Connection between the Issuer and the entity running the DLT A. 20 – Description of the connection between the Issuer and the entity running the DLT A.21 – Newly Established A.22 – Financial conditions for the past three years A.23 – Financial conditions since registration A.24 – Exemption from authorization A.25 – E-money Token Authorisation A.26 – Authorisation Authority A.27 – Persons other than the issuer offering to the public or seeking admission to trading of the e-money token according to Article 51(1), second subparagraph of Regulation (EU) 2023/1114 A.28 – Reason for offering to the public or seeking admission to trading of the e-money token by persons referred to in Article 51(1), second subparagraph of Regulation (EU) 2023/1114
--	--	--

		PART B - INFORMATION ABOUT THE E-MONEY TOKEN B.1 – Name B.2 – Abbreviation B.3 – Details of all natural or legal persons involved in design and development B.4 – Type of white paper B.5 – The type of submission B.6 – Crypto-Asset Characteristics B.7 – Website of the Issuer B.8 – Starting date of offer to the public or admission to trading B.9 – Publication date B.10 – Any other services provided by the Issuer B.11 – Identifier of operator of the trading program B.12 – Language or languages of the white paper B.13 – Digital Token Identifier Code B.14 – Functionally Fungible Group Digital Token Identifier B.15 – Personal data flag B.16 – LEI eligibility B.17 – Home Member state B.18 – Host Member states PART C - INFORMATION ABOUT THE OFFER TO THE PUBLIC OF THE E-MONEY TOKEN OR ITS ADMISSION TO TRADING C.1 – Public Offering or Trading C.2 – Number of units C.3 – Trading Platforms C.4 – Trading Platforms Market Identifier Code (MIC) C.5 – Applicable law C.6 – Competent court
--	--	--

		PART D - INFORMATION ON THE RIGHTS AND OBLIGATIONS ATTACHED TO E-MONEY TOKENS D.1 – Holder’s rights and Obligations D.2 – Conditions of modifications of rights and obligations D.3 – Description of the rights of the holders D.4 – Rights in implementation of recovery plan D.5 – Rights in implementation of redemption plan D.6 – Complaint Submission Contact D.7 – Complaints Handling Procedures D.8 – Dispute Resolution Mechanism D.9 – Token Value Protection Schemes D.10 – Token Value Protection Schemes Description D.11 – Compensation Schemes D.12 – Compensation Schemes Description D.13 – Applicable law D.14 – Competent court PART E - INFORMATION ON THE UNDERLYING TECHNOLOGY E.1 – Distributed ledger technology E.2 – Protocols and technical standards E.3 – Technology Used E.4 – Purchaser’s technical requirements E.5 – Consensus Mechanism E.6 – Incentive Mechanisms and Applicable Fees E.7 – Use of own Distributed Ledger Technology E.8 – DLT Functionality Description E.9 – Audit E.10 – Audit outcome PART G - INFORMATION ON THE SUSTAINABILITY INDICATORS IN RELATION TO ADVERSE IMPACT ON THE CLIMATE AND OTHER ENVIRONMENT-RELATED ADVERSE IMPACTS
--	--	--

		G.1 – Adverse impacts on climate and other environment-related adverse impacts Table 1 – Climate and other environment related indicators for EURD EMT
I.01	Date of notification	This white paper was notified to <i>De Autoriteit Financiële Markten</i> (AFM) on 1 August 2024 and subsequently published on 18 September 2024. The latest modified white paper was notified to the AFM on 22 August 2025 and subsequently published on 22 September 2025.
I.02	Regulation (EU) 2023/1114	This e-money token ("EMT") white paper ("White Paper") has not been approved by any competent authority in any Member State of the European Union ("EU"). The issuer of the crypto-asset is solely responsible for the content of this White Paper.
I.03	Compliance statement in accordance with Article 51(5) of Regulation (EU) 2023/1114	This White Paper complies with Title IV of Regulation (EU) 2023/1114 and to the best of the knowledge of the management body, the information presented in the White Paper is fair, clear and not misleading and the White Paper makes no omission likely to affect its import.
I.04	Warning in accordance with Article 51(4), points (a) and (b) of Regulation (EU) 2023/1114	The EURD e-money token ("EURD EMT") issued by Quantoz Payments B.V. ("Quantoz Payments") is not covered by the investor compensation schemes under Directive 97/9/EC. EURD EMT is not covered by the deposit guarantee schemes under Directive 2014/49/EU.

	Executive Summary	
--	-------------------	--

I.05	Warning in accordance with Article 51(6), second subparagraph of Regulation (EU) 2023/1114s	This executive summary should be read as an introduction to the White Paper. The prospective holder should base any decision to purchase EURD EMTs on the content of the White Paper as a whole and not on this summary alone. The offer to the public of the EURD EMT 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 White Paper does not constitute a prospectus as referred to in Regulation (EU) 2017/1129 of the European Parliament and of the Council (36) or any other offer document pursuant to EU or national law.
I.06	Characteristics of the crypto-asset	EURD refers to two technically distinct but economically equivalent forms: • <u>EURD E-money</u>; electronic money held in an account within Quantoz' internal ledger; and • <u>EURD EMT</u>; an Electronic Money Token (EMT) within the meaning of MiCAR, issued on the Algorand blockchain as an Algorand Standard Asset (ASA) to whitelisted self-hosted or third-party CASP wallets (together hereinafter referred to as "Customer Hosted Wallets"), which can be used inside the closed EURD EMT payment network. This whitepaper does <i>not</i> apply to EURD E-money. For the applicable terms and conditions regarding EURD E-money, please refer to the EURD E-money Terms of Service of Quantoz Payments. The EURD EMT is an euro-backed stablecoin issued by Quantoz Payments. It is classified as an electronic money token, designed to maintain a stable value equivalent to the euro. This stability is achieved through a pegging mechanism, with each EURD EMT fully backed by equivalent euro reserves. To ensure that the funds are segregated from Quantoz Payment's assets, the funds are held by Stichting Quantoz (hereafter: "Quantoz Foundation"), a bankruptcy remote setup which will ensure that customer funds are fully ringfenced from any potential liquidation. Quantoz Payments and Quantoz Foundation are subject to prudential supervision by DNB,

		subject to the electronic money institution (EMI) license of Quantoz Payments.
I.07	Right of redemption	Holders of the EURD EMT have the right of redemption at any time and at par value, under the conditions that the holder signed up to create an account with Quantoz Payments and provided valid KYC/AML and bank details. Redemptions can only be done through Quantoz Payments by using the Quantoz Payments applications. The Quantoz Payments applications can be used at no costs. Quantoz Payments distinguishes between business users and consumer users. Business users are merchants that supply goods/services paid for by consumer users with EURD EMT. Business users may redeem any amount in EURD EMT for fiat money, including EURD EMTs not obtained by them directly from Quantoz Payments (but obtained from consumer users or other business users). Where consumers wish to redeem more EURD EMT than they have acquired directly from Quantoz Payments, the redemption process may be subject to additional KYC and AML controls. Consumers will be notified by the Quantoz Payments applications when additional information, such as passport or source of funds declarations are required. The right of redemption, including its conditions and processes, is stated in the EURD EMT Terms of Service as can be found on the Quantoz Payments website: https://quantozpay.com/terms/ Holders of EURD EMT in a whitelisted Customer Hosted Wallet retain the right of redemption at any time and at par value, provided that the holder has signed up with Quantoz Payments and supplied valid KYC/AML and bank details. Redemptions are always initiated through the Quantoz Payments applications, which are available free of charge. When a Customer Hosted Wallet holder initiates redemption of EURD EMTs, the tokens must be transferred by the Customer to the designated blockchain address of Quantoz Payments (burned). By default, the Customer is immediately paid out in fiat euros via SEPA to their linked bank account. Alternatively, the Customer may opt to convert the redeemed tokens into EURD E-money credited to their Managed Account (as defined in the EURD EMT Terms of Service). Users may redeem EURD EMT within the limits set by their Account Tier. Quantoz Payments distinguishes between business and consumer users for this purpose. If consumers wish to redeem amounts beyond their tier limits or more than they directly obtained from Quantoz Payments, additional KYC/AML information may be

		required. These requests will be communicated through the Quantoz Payments applications. The right of redemption, together with detailed conditions and processes, is set out in the Quantoz Payments terms and conditions available at https://quantozpay.com/terms/.
I.08	Key information about the offer and/or admission to trading	EURD EMT is classified as e-money token within the meaning of Article 3 (1)(7) MiCAR , and is issued exclusively by Quantoz Payments. Pursuant to article 48(2) MiCAR, all EMT representing the value of an official currency of a Member State of the European Union are automatically deemed to be offered to the public upon issuance. Therefore, EURD EMT is always considered to be offered to the public, regardless of where a potential holder might purchase or receive it. There is a cap on the total amount of EURD EMT available to the public of 10.55T EURD EMT. The issue price of EURD EMT is always set at a 1:1 ratio with the euro, meaning each EURD EMT token is priced at one euro. Quantoz Payments might charge fees for issuing but not for redemption. A fixed 0,50 for the EURD EMT payout to cover banking costs is applied. The specific maximum acquiring, and redemption limits depend on the KYC, AML and financial information provided by the holder and are described in our EURD EMT Terms of Service https://quantozpay.com/terms/

	PART F - INFORMATION ON THE RISKS	
--	--	--

F.1	Issuer-Related Risks	Regulatory Risk The legal and regulatory landscape applicable to EURD EMT is still evolving, potentially subjecting customers to uncertain or fluctuating rules and requirements. To mitigate this risk, Quantoz Payments is committed to maintaining transparent communication with relevant regulatory authorities and advisors, seeking guidance and clarification on evolving regulations. By closely monitoring regulatory changes, Quantoz Payments can stay informed about any new rules or requirements that may impact its operations. In addition, there is also a risk of potential regulatory arbitrage, wherein
-----	----------------------	---

		competitors may exploit differences in regulatory requirements across jurisdictions to gain a competitive advantage. This could pose challenges for Quantoz Payments in terms of maintaining a level playing field. To address this risk, Quantoz Payments will closely monitor regulatory developments in various jurisdictions and proactively engage with regulatory authorities to ensure compliance with the current regulations. Quantoz Payments will assess the regulatory frameworks to identify any potential gaps or inconsistencies that could be exploited by competitors and will take appropriate measures to mitigate such risks. Quantoz Payments engages reputable independent legal counsel to seek advice and ensure continued compliance with applicable regulations. Conflict of Interest risk In addition to EURD EMT, Quantoz Payments issues two other electronic money tokens, EURQ and USDQ, which may lead to potential conflicts of interest between the tokens. The introduction of more e-money tokens in the future could further amplify these risks. To address this, Quantoz Payments must ensure careful management and balance of its commitments, so that the interests of each token holder are fairly represented. Bankruptcy risk Although the risk is very small given that Quantoz Payments and the financial partners it works with are supervised by DNB and meet strict prudential requirements, Quantoz Payments could go bankrupt, or face problems if one of its partner banks goes bankrupt. The management team runs the company in a professional manner, acts honestly and fairly and is assessed by the supervisory board and has implemented procedure to monitor financial performance of the company and its financial partners. Treasury Risk Treasury risk encompasses the potential for adverse financial impacts resulting from fluctuations in interest rates, foreign exchange rates, credit spreads, and other financial variables. For e-money issuers, treasury risk primarily relates to the management of their asset portfolios and exposure to various financial instruments. Given that Quantoz Payments is required to comply with MiCAR requirements regarding the safeguarding of funds received in exchange for EURD EMTs, Quantoz Payments may only invest in secure, low-risk assets that qualify as highly liquid financial instruments with minimal market risk, credit risk and concentration risk and denominated in Euro.
--	--	---

		However, for instance, fluctuations in interest rates could impact the value of such financial instruments (including bonds), potentially resulting in situations where instruments will be sold at a loss. This risk is particularly pertinent during scenarios like a bank run, where customers seek to liquidate all of their EURD EMT simultaneously. In such instances, Quantoz Payments may be forced to liquidate the relevant assets at a loss or temporarily set daily redemption limits. Reputation Risk There exists the potential for negative public perception or a loss of trust in Quantoz Payments or EURD EMT itself, which could adversely affect its reputation and credibility. To mitigate this risk, Quantoz Payments maintains a robust governance framework and adheres to high ethical standards across all aspects of its business operations. This includes a commitment to transparency and full compliance with all relevant regulations, ensuring accountability and trustworthiness in its practices. Quantoz Payments engages reputable third-party auditors to conduct regular audits, verifying its adherence to industry standards and best practices. This not only adds credibility to the Issuer but also enhances its reputation in the eyes of stakeholders. Furthermore, Quantoz Payments recognizes the inherent risks associated with conducting business with customers or third parties engaged in money laundering or corrupt practices. Such associations can significantly damage Quantoz Payments' reputation and credibility. To mitigate this risk effectively, Quantoz Payments has implemented rigorous Know Your Customer (KYC) and Anti-Money Laundering (AML) rules and practices. Compliance Risk In the context of banking and financial services, compliance risk encompasses various regulatory requirements related to anti-money laundering (AML), know-your-customer (KYC) rules, counterterrorism financing (CTF), consumer protection laws, data privacy regulations, and other applicable statutes. To mitigate compliance risk, Quantoz Payments implements robust compliance programs, including regular monitoring, risk assessments, and the establishment of effective control mechanisms. Additionally, maintaining open communication with regulators, staying abreast of regulatory developments, and conducting periodic compliance audits are essential components of managing compliance risk effectively. When using public blockchains each transaction on a new block requires a small transaction fee in the native blockchain
--	--	---

	currency. The fees are collected by the mining/validator nodes. Based on the used decentralized protocol, in theory the mining of a new block could be done by a sanctioned entity. In that case these transaction fees are paid to a sanctioned entity. This risk is very low in a blockchain with good governing foundation and a consensus protocol using known validator nodes, especially when those nodes require whitelisting. Counterparty Risk Counterparty risk refers to the risk that one party in a financial transaction may default or fail to fulfil their obligations, leading to financial losses for the other party. If Quantoz Payments would become insolvent, the EURD EMT backed fiat currency remains available in Quantoz Foundation. The Quantoz Foundation is exposed to banking risk for the fiat euro deposits held on the bank, wherein its operations rely on the bank's ability to meet its obligations. To mitigate such risk, the Issuer has accounts with multiple banks and conducts regular audits and thorough due diligence of its counterparties to assess their financial stability and risk profiles, ensuring engagement only with reliable and trustworthy entities. Professional legal advisors are also engaged to establish or review contractual agreements with counterparties, clearly outlining terms, conditions, and dispute resolution mechanisms in case of defaults or insolvencies. These measures form part of a comprehensive risk management framework established to identify, monitor, and mitigate counterparty risk, including the development of contingency plans for potential defaults or insolvencies. Third party Risk Quantoz Payments relies on various external service providers, such as banks, to perform essential functions like safeguarding assets and facilitating settlements. This reliance means that if these third parties encounter issues, it could directly impact Quantoz Payments ability to operate effectively. If a third-party service provider fails to deliver its services (e.g., due to technical problems, insolvency, or regulatory issues), this could hinder Quantoz Payments ability to issue, manage, or redeem EURD EMT. This creates a vulnerability where Quantoz Payments operations are contingent on the performance of others. Market Risk Regarding investments (excluding the fiat reserves of at least 30% which are held with credit institutions), their value may vary according to market conditions. As a result, there is a possibility that the 1:1 coverage may no longer be assured. EURD EMT
--	--

		reserves may consist of assets that are not guaranteed to be readily realisable, including certain short-term financial assets. Consequently, if there is an unusually high demand for EURD EMT redemptions, Quantoz Payments may not be able to meet all redemption requests within the timeframe set out in the Redemption Policy. Technology Risk The technology behind EURD EMT, including the blockchain network, might be exposed to potential vulnerabilities and cyber threats. While independent audits have validated the security of these systems, unforeseen vulnerabilities or cyber-attacks could still pose risks to EURD EMTs integrity. Quantoz Payments conducts regular security audits, continuously monitors for vulnerabilities, and utilizes advanced cybersecurity measures to safeguard the system. Risk of privacy/GDPR breach Personal data of Quantoz Payments customers may be leaked or stolen due to a security breach. Operational Risk Quantoz Payments' efficient operation depends on strong internal processes and systems. Failures or disruptions, such as human errors, system breakdowns, or insufficient internal controls, could negatively impact the issuance and redemption of EURD EMTs. Mitigation strategies include regular audits, comprehensive employee training programs, and the deployment of advanced internal control systems. Environmental, Social, and Governance (ESG) Risk: With the growing global focus on ESG factors, failing to uphold sustainable and ethical practices could harm Quantoz Payments' reputation and operations. This encompasses the environmental impact of blockchain activities, social responsibility, and governance standards. To address these risks, Quantoz Payments will adopt sustainable business practices, maintain transparency in governance, and actively engage in social responsibility initiatives.
F.2	Token-Related Risks	Liquidity Risk Liquidity risk refers to the possibility that an e-money issuer may encounter difficulties in meeting its short-term financial obligations due to a lack of sufficient liquid assets or marketability of its assets. For an e-money issuer, liquidity risk

		primarily arises from the need to fulfil redemption requests from customers who want to convert their EURD EMTs back into fiat currency. As Quantoz Payments holds the backed e-money in assets like Euro-backed bonds, in addition to funds that are deposited in separate accounts in credit institutions (amounting to at least 30% of the funds received, as required by MiCAR), there may be challenges in quickly liquidating these bonds to fulfil withdrawal requests from customers simultaneously. However, government bonds issued by stable governments in major currencies like the Euro are typically highly liquid and can be sold swiftly in active markets. Risk of Under-Collateralisation The Risk of Under-Collateralisation refers to the possibility that the assets backing EURD EMT become insufficient to meet redemption obligations when the reserves intended to support its value fall below the total amount issued and in circulation. This situation may arise due to factors such as fraud, where malicious activities like embezzlement or financial manipulation led to improper reporting or depletion of reserves, and mismanagement, where poor financial practices by Quantoz Payments or its third-party providers result in inadequate oversight of the backing assets. If the market perceives that Quantoz Payments might fail to redeem EURD EMT at its promised value, it could trigger a loss of confidence, causing the market value of EURD EMT to drop significantly and creating a disparity between its issued value and trading price. Ultimately, insufficient collateral could prevent Quantoz Payments from redeeming EURD EMT holders at the promised rate or within a reasonable timeframe, resulting in dissatisfaction and eroded trust among users. Technological Risk Any technical issues, vulnerabilities, or failures in the Algorand blockchain network could affect the functionality and transferability of EURD EMT. Quantoz Payments continuously monitors the performance of the Algorand network. Market Risk EURD EMT value and demand may be affected by overall market conditions and may affect the liquidity and stability of EURD EMT. Taxation Risk
--	--	---

		The taxation regime that applies to EURD EMT transactions will depend on each holder's jurisdiction. Transactions involving EURD EMT may have tax consequences. Scam Risks EURD EMT holders may suffer scam or fraud actions including phishing, identity theft, fake EURD EMT tokens from malicious actors.
F.3	Technology-Related Risks	Reliance on third-party infrastructure EURD EMT relies on third-party blockchain networks and service providers to operate. Disruptions, outages, or security breaches in these third-party services could impact EURD EMTs functionality and security. Forging strong partnerships with reputable third-party providers and developing contingency plans to address potential disruptions mitigates these risks. Blockchain Risk The most important risk Quantoz Payments is subject to is blockchain risk. Blockchain risk for an e-money issuer refers to the potential challenges, vulnerabilities, and uncertainties associated with utilizing blockchain technology in the issuance and management of EURD EMTs. The blockchain risk consists of several components: • <i>Operational availability:</i> As any technology application a blockchain could experience technical issues that disrupt availability. However, because of the distributed nature (preventing cyberattacks) and strict review process on the source code (preventing software bugs) blockchains in general show a very robust availability. In practice blockchain applications are typically more reliable than traditional banking applications (availability >> 99,9%). • <i>Algorand blockchain hack:</i> Although the risk is very low, a hack of the Algorand blockchain would lead to a loss of trust in the Algorand foundation and its technology. It would also hinder Quantoz Payments's operations, but no information or value would get lost. The fiat money is in the trusted bank account of the Quantoz Foundation, and the user's balances are available in the Nexus system. • <i>Discontinuation of service:</i> Theoretically a public blockchain could lose community support with

		decreasing development effort and foundation funding, and a decreasing number of validator nodes as result. The public blockchain consensus will no longer be reliable. Two possible exit scenarios could be to start running the blockchain privately (Quantoz Payments forks the public blockchain and starts running private blockchain nodes) or to migrate to an alternative blockchain (Quantoz Payments “burns” the tokens on the original blockchain and re-issues the tokens on the new blockchain). The transaction history remains available in the Nexus database of Quantoz Payments, independent of the used blockchain. • <i>Risk of malicious use of software bugs:</i> The core code of the blockchain nodes is open source and follows a strict review process before being published for production. At the same time a bug in a blockchain can be very attractive for hackers and there will be continuous attempts to find weaknesses. As a result, blockchain applications are the best tested and best reviewed software in existence, and all stakeholders have incentives and means to check, prevent and fix vulnerabilities. Almost all known past blockchain exploits have not been on the core blockchain code, but in smart contract applications running on the core. Quantoz Payments uses no smart contracts for the EURD EMT issuance and redemption but applies blockchains with native support for tokenized assets in the core code. • <i>Risk of blockchain scalability and economics:</i> Public blockchains have a limitation on the maximum transaction throughput. When a blockchain is very popular it could reach its technical limits. This will result in rising transaction fee costs for getting transactions on the next blockchain block. This risk is mitigated by the fact that Quantoz Payments by default uses blockchains that have a high throughput to start with (hundreds/thousands of transactions per second without history of congestion). Furthermore, Quantoz Payments technically supports multiple blockchains and can decide to migrate to an alternative blockchain or sidechain. • <i>Risk of stolen private keys of Customer Hosted Wallets:</i> When the private key of a Customer Hosted Wallet is stolen, it can be used to transfer the EURD EMTs from
--	--	--

		that customer to other external wallets. However, as Quantoz Payments only allows tokens to exist on addresses of known customers (i.e. whitelisted Customer Hosted Wallets), and the tokens in itself do not represent a value (as the real value is safely stored on a trust bank account), the stolen tokens cannot "disappear" or being cashed-out outside of the supervision of Quantoz Payments. • <i>Loss of keys by customers:</i> As Customers manage their own private keys for the Customer Hosted Wallets, a loss of their private key can be handled by Quantoz Payments by closing their account and re-issuing their EURD EMTs to a new whitelisted Customer Hosted Wallet. • <i>Loss of keys by Quantoz Payments:</i> Quantoz Payments has certified security and backup procedures in place. Keys are only accessible by security assigned personnel. Furthermore, Quantoz Payments uses deterministic key generation. Therefore, the original (offline held) seed codes can be used to reconstruct all private keys. Integrity and confidentiality of seed codes breached: The seed codes of the used primary keys are protected using the Azure key vault service. This provides extreme secure storage. When the integrity and confidentiality of the seed codes would still be breached, the consequences are limited and can be mitigated. • <i>Risk of privacy/GDPR breach:</i> Quantoz Payments only stores payment transactions and no transaction containing personal data of its users on the blockchain. On top of that, Algorand separates erasable from non-erasable data and guarantees the post-erasure integrity of a block by separately storing the hash of any erasable data. This makes Algorand a GDPR compliant blockchain protocol. Theoretically it is possible to use big data analytics to follow the transaction flows on public blockchains. By knowing their own blockchain account address and following their own transactions when interacting with other known customers, malicious customers of Quantoz Payments could in time map specific addresses on the blockchain with specific merchants and/or consumers. To prevent such analytics, Quantoz Payments has multiple options to enhance privacy. • <i>Risk of 51% attack:</i> At all-time a "51%-attack" needs to be prevented where a single entity dominates the
--	--	---

		validation and can influence the addition (and rejection) of new transactions. This risk is small for the reputational blockchains with a well-established governing foundation, active and diverse user community and substantial transaction volume. In that case all blockchain participants and stakeholders are motivated to support the consensus model. During the last 10 years of blockchain applications no successful 51%-attack on such blockchain is known of. • <i>Risk of double-spending/orphan transactions:</i> Some consensus models store confirmed transactions on the blockchain which are not immediately 100% firm, but theoretically could still be overruled (double-spending) in the next few blocks. As a result, the receiver of such transaction should wait up to an hour before being sure of owning the received tokens. This is not practical for an e-money payment system. Therefore Quantoz Payments only uses blockchains with a consensus model where transactions are final at first confirmation on a new block for its issuance and redemption of EURD EMT. With such models there is no risk of double-spending or orphan transactions. • <i>Risk of token usage outside of the whitelisted customer community:</i> The EURD EMT of Quantoz Payments may only be owned or used by Customers that are onboarded by Quantoz Payments through an appropriate customer due diligence procedure. Therefore, it should be not possible to send the EURD EMTs to blockchain addresses that are not whitelisted by Quantoz Payments as being owned by a specific Customer. To mitigate this risk Quantoz Payments uses blockchains that support such functionality on their core protocol level. • <i>Risk of continued use of tokens by blacklisted customers:</i> The EURD EMTs of Quantoz Payments should not be used from addresses of customers that have been blacklisted or followed the exit procedure. Therefore it should be possible for Quantoz Payments to freeze the EURD EMTs on such addresses and preferably also to be able to clawback these tokens to the issuing account of Quantoz Payments itself if required by applicable laws and regulations or at the instruction of a competent (supervisory) authority. To mitigate this risk Quantoz Payments uses blockchains that support such functionality on their core protocol level.
--	--	---

		The Algorand blockchain has an excellent reputation, with a 100% uptime since its launch. The use of the Algorand blockchain, combined with our robust risk mitigation measures, allows Quantoz Payments to minimize potential blockchain risks listed above.
F.4	Mitigation measures	Regarding the different risks identified in Sections F.1, F.2 and F.3, Quantoz Payments implements appropriate measures to mitigate these risks and protect EURD EMT holders: Mitigation measures concerning issuer-related risks • In the event of Quantoz Payments' bankruptcy, EURD EMT holders' rights are protected by law, ensuring that EURD EMT reserves remain untouched by other creditors and will be refunded during bankruptcy proceedings. • The company conducts extensive vendor assessments for third-party service providers per ISO 27001 standards. • Despite market volatility, EURD EMT redemptions are guaranteed according to the Redemption Policy. • EURD EMT holders retain their redemption rights even if the company incurs losses, with contingency plans in place for extreme situations. • To combat AML/CFT risks, transactions are limited to whitelisted Customer Hosted Wallets, with the ability to freeze suspicious transactions as per legal requirements or instruction of a competent (supervisory) authority. • Quantoz Payments also adheres to GDPR, ensuring the security and integrity of personal data against unauthorized access or damage. Mitigation measures concerning EURD EMT-related risks • Quantoz Payments has outlined several key risks associated with the use of EURD EMT. • To ensure financial stability, our internal procedures aim to maintain reliability under all market conditions. • In cases of under-collateralization, measures from the Quantoz Payments Recovery or Redemption Plan will be implemented to resolve any deficits, potentially by strengthening our capital position. • A Redemption Policy addresses liquidity risks by ensuring prompt redemption, even under extreme demand and unfavorable market conditions. • While Quantoz Payments cannot prevent scams, our terms specify no liability for losses due to fraud, though

		we can freeze affected EURD EMT if required by applicable laws and regulations or at the instruction of a competent (supervisory) authority. • Taxation risks are the responsibility of individual EURD EMT holders, who should seek independent advice, as Quantoz Payments does not provide legal, tax, or accounting guidance. Mitigation measures concerning technology-related risks • Blockchain related Risks. While risks exist for all blockchain networks, the Algorand network is recognised for its high level of security. There is no smart contract risk. • The NEXUS technology is developed and managed by subsidiaries of the Quantoz group with short communication channels.
--	--	--

	PART A - INFORMATION ABOUT THE ISSUER OF THE E-MONEY TOKEN	
--	---	--

A.1	Statutory Name	Quantoz Payments B.V.
A.2	Trading Name	Quantoz Payments
A.3	Legal form	54M6 - Besloten Vennootschap
A.4	Registered Address	Europalaan 100, 3526 KS Utrecht, The Netherlands
A.5	Head Office	Europalaan 100, 3526 KS Utrecht, The Netherlands
A.6	Registration Date	September 30, 2021
A.7	Legal Entity Identifier	7245008P1HPUPVM7XL94
A.8	Another Identifier	Company Registration Number: 84071745

A.9	Contact telephone number	+31 30 2272621
A.10	Contact email address	contact@quantozpay.com
A.11	Response time (days)	7
A.12	Parent Company	Quantoz N.V., having its registered office located at Europalaan 100, 3526 KS Utrecht, The Netherlands
A.13	Members of the management body	Quantoz Payments has a Board of Directors consisting of four directors being the decision makers for the Company: A. Star Busmann <i>CEO (General Management)</i> N. Haasnoot, <i>CFRO (, Finance, HR, Legal, Compliance)</i> H. de Jong, <i>COO (Business Development, Marketing and Sales)</i> G. Hendriks, <i>CTO (Technology, Systems and Operations)</i> Quantoz Payments has installed a Supervisory Board, consisting of two members: one independent expert in the field of payments and related regulations, and one representing the shareholders. R. Berndsen, the independent expert, chairs the Supervisory Board. E. Dekkers, represents the shareholders The Supervisory Board oversees the functioning of Quantoz Payments and its Board of Directors. All members of the Quantoz Payments Management team and the Quantoz Payments shareholders have been non-objected and passed fit & proper assessments by the DNB. The shareholders have DNOs (declarations of no objection) granted by DNB. The business address of the members of the Board of Directors and the members of the Supervisory Board is: Europalaan 100, 3526 KS Utrecht, The Netherlands.
A.14	Business Activity	Quantoz Payments has an E-money license in the EEA with De Nederlandsche Bank N.V. (DNB) and issues E-Money and EMTs under this license, and specializes in developing and delivering

		secure, efficient, and compliant digital financial solutions, for both these variants. EURD exists in two technically distinct but economically equivalent manifestations: (i) <i>EURD E-money</i>, which is booked on a customer's EURD E-money Account within Quantoz's internal EMI ledger, and (ii) <i>EURD EMT</i>, an Algorand Standard Asset (ASA) that can be held only in whitelisted Customer Hosted Wallets inside the closed EURD EMT payment network. Only EURD EMT that has entered circulation is fully backed by fiat money, one-for-one, to an official currency. The funds received by Quantoz Payments in exchange for the EMTs are safeguarded in compliance with the relevant requirements under Article 54 MiCAR. At least 30% of the funds received are always deposited in separate accounts in credit institutions to meet anticipated redemptions. The remaining funds received are invested in secure, low-risk assets that qualify as highly liquid financial instruments with minimal market risk, credit risk and concentration risk and are denominated in euro. The funds are safeguarded through a bankruptcy-remote structure in the form of the Quantoz Foundation. Such a structure is common in the Netherlands for electronic money institutions and payment service providers. Reference is made to the DNB register, in which the Quantoz Foundation is mentioned in relation to the registration of Quantoz Payments, with the following explanation: "Stichting Quantoz is as escrow party related to Quantoz Payments and in that matter supervised by De Nederlandsche Bank". The European Economic Area is Quantoz Payments' principal EURD market. The company's primary revenue-generating activities are derived from the interest generated by the asset-reserves backing the issued EURD EMTs along with offering additional services related to EURD EMTs. Besides EURD EMT, Quantoz Payments issues two other EMTs, EURQ and USDQ. EURD EMT is used for Payments. For payment applications, involving payment ecosystems of traditional corporate entities, users of the tokens typically do not use or own cryptocurrencies and prefer to limit token distribution to whitelisted Customer Hosted Wallets only. The primary goal of EURQ and USDQ is to offer a digital alternative to traditional money that is more efficient, secure, and accessible. Quantoz Payments envisions EURQ and USDQ
--	--	--

		to have applications ranging from online transactions and cross-border payments to trading liquidity and decentralized finance (DeFi) solutions. Key customers of Quantoz Payments include financial institutions, Crypto Asset Service Providers, Market Makers, and businesses improving their operations by using regulated programmable EMTs. By leveraging advanced blockchain technology and robust security measures, Quantoz Payments aims to position itself as a leader in the digital finance sector by being committed to innovation, transparency, and regulatory compliance.
A.15	Parent Company Business Activity	Quantoz N.V. is the holding company for the three entities of the Quantoz group: Quantoz Technology BV employs most of the staff and develops the NEXUS EMI platform, a gateway between fiat money and public and private blockchains. Through NEXUS, Quantoz Technology's partners can manage their custom token ecosystem without the need to deal with the technical aspects. The NEXUS EMI platform supports technical processes, such as, for example, know-your-customer registration, ledger reconciliation and mint and/or burn execution. Quantoz Blockchain Services BV operates the NEXUS EMI platform, developed by Quantoz Technology BV, as a SaaS to third parties for the support of their technical processes. Quantoz Blockchain Services BV facilitates both internal (intragroup) and external partners. Quantoz Payments, issues Electronic Money Tokens and Electronic Money under its EMI license with DNB.
A.16	Conflicts of Interest Disclosure	The entities in the Quantoz group are interdependent and reliant on each other, but also have external customers and their own (corporate) responsibilities. Should these relationships have a direct impact on the activities of Quantoz Payments, the impact would be identified, disclosed and managed transparently to avoid any undue influence on operations. Quantoz Payments issues two additional electronic money tokens, EURQ and USDQ, which may lead to potential conflicts

		of interest in terms of resource allocation, marketing focus, and strategic direction between the tokens. In order to describe how Quantoz Payments identifies and manages possible Conflicts of Interest within its organization, a ‘Conflicts of Interest Policy’ has been adopted. This policy applies to everyone working for, or on behalf of, the Company.										
A.17	Issuance of other crypto-assets	Yes. The Company also issues USDQ, a US dollar backed EMT, and EURQ a Euro-backed EMT within the EEA.										
A.18	Activities related to other crypto-assets	The Company provides similar services to EURQ and USDQ as it does to EURD EMT.										
A.19	Connection between the Issuer and the entity running the DLT	No										
A.20	Description of the connection between the Issuer and the entity running the DLT	No										
A.21	Newly Established	No										
A.22	Financial conditions for the past three years.	Quantoz Payments has consistently maintained a robust and regulatory-compliant reserve. E-money and EMTs issued by Quantoz Payments are fully backed by equivalent reserves held in regulated financial institutions. These reserves are kept separate from Quantoz Payments' own funds to protect the assets of the EMT holders, ensuring their security even in the event of Quantoz Payments' insolvency. Quantoz Payments has maintained capital reserves ensuring robust backing for its organisation. As Quantoz Payments is in early stage, modest starting costs dominated the profit & loss account. The license was granted in October 2023. Before that time revenue was not allowed. <table><tr><td>Year</td><td>2021</td><td>2022</td><td>2023</td><td>2024</td></tr><tr><td>Revenue</td><td>0</td><td>0</td><td>0</td><td>51</td></tr></table>	Year	2021	2022	2023	2024	Revenue	0	0	0	51
Year	2021	2022	2023	2024								
Revenue	0	0	0	51								

		<table><tr><td>Equity (Tier 1 capital)</td><td>502</td><td>430</td><td>592</td><td>2.100</td></tr><tr><td>Capital requirement</td><td>350</td><td>350</td><td>350</td><td>350</td></tr></table>	Equity (Tier 1 capital)	502	430	592	2.100	Capital requirement	350	350	350	350
		Equity (Tier 1 capital)	502	430	592	2.100						
		Capital requirement	350	350	350	350						
All values 1.000 €												
		Remarkable events: • 2021 30th September: Foundation of the company to enable the application for an EMI license. • 2022 Year dedicated to license application Installation of Supervisory Board Engagement of external advisor • 2023 13th October: License granted by the Dutch Central Bank The company has ample liquidity and sufficient capital resources from its existing shareholders, with financial statements detailing its performance reported to authorities without issues. Quantoz Payments' commitment to transparency, regulatory compliance, and sound financial practices has positioned it well in the digital finance sector, particularly with EMTs. The company focuses on innovation, expansion, financial health, and stakeholder value.										
A.23	Financial conditions since registration	N/A										
A.24	Exemption from authorisation	No										
A.25	E-money Token Authorisation	Electronic Money Institution license (EMI) License granted: 13 October 2023 License relation number: R186418										
A.26	Authorisation Authority	De Nederlandsche Bank (DNB). <i>Dutch Central Bank</i>										

A.27	Persons other than the issuer offering to the public or seeking admission to trading of the e-money token according to Article 51(1), second subparagraph of Regulation (EU) 2023/1114	Currently, no third-party is authorized to offer EURD EMTs to the public. This situation may be subject to changes in the future.
A.28	Reason for offering to the public or seeking admission to trading of the e-money token by persons referred to in Article 51(1), second subparagraph of Regulation (EU) 2023/1114	N/A

	PART B - INFORMATION ABOUT THE E-MONEY TOKEN	
--	---	--

B.1	Name	Quantoz EURD EMT	
B.2	Abbreviation	EURD EMT	
B.3	Details of all natural or legal persons involved in design and development	Legal	Finnius Advocaten. Jollemanhof 20 A, 1019 GW Amsterdam, The Netherlands
		Technology	Quantoz Technology B.V. Europalaan 100, 3526 KS Utrecht, The Netherlands Quantoz Blockchain Services B.V. Europalaan 100, 3526 KS Utrecht, The Netherlands

B.3	Partners	Design and development of EURD EMT was done by subsidiaries of Quantoz NV. The relevant business entities of Quantoz N.V. are: • Quantoz Technology BV, employs most of the staff • Quantoz Blockchain Services BV, providing the EMI backend platform (“NEXUS”) as a SaaS solution to its partners for support on their technical processes • Quantoz Payments BV, issuer of the EURD EMT and providing a licensed e-money solution All business entities within the Quantoz NV group are ISO 27001 certified.
B.4	Type of white paper	EMTW (Electronic-Money Token White Paper)
B.5	The type of submission	MODI (modified)
B.6	Crypto-Asset Characteristics	EURD is used as a reference to (i) electronic money (e-money) issued by Quantoz and (ii) an electronic money token issued by Quantoz, which token is a stablecoin with a value 1:1 linked to the euro. While both forms are economically and functionally equivalent from the perspective of the holder, their legal classification differs depending on the underlying technology used. Only the EURD EMT, when minted and issued on the Algorand blockchain to a whitelisted Customer Hosted Wallet, qualifies as a “crypto-asset” under Article 3(1)(7) MiCAR and more specifically as an electronic money token (EMT). The EURD EMT Whitepaper has been submitted and accepted as an EMT whitepaper under Article 51 MiCAR. Each EURD EMT is fully backed 1:1 by euro reserves segregated from Quantoz’s assets and safeguarded by the bankruptcy-remote Quantoz Foundation. The Quantoz Payments web portal provides business customers (and professional consumers) additional functions besides the standard electronic money payment functionality of the mobile App. Customers can add whitelisted Customer Hosted Wallets to receive and manage issued EURD EMTs and create API keys for

		integration with the Quantoz Payments backend (for automation). EURD EMT holders can always redeem their EMT at par value.
B.7	Website of the Issuer	www.quantozpay.com
B.8	Starting date of offer to the public or admission to trading	2024-09-01
B.9	Publication date	2025-09-10
B.10	Any other services provided by the Issuer	No
B.11	Identifier of operator of the trading platform	N/A
B.12	Language or languages of the white paper	English
B.13	Digital Token Identifier Code	EURD EMTs Digital Token Identifier is registered under DTI 3R9LGFRFP on the Digital Token Identifier Foundation website: https://dtif.org/token-registry-search/
B.14	Functionally Fungible Group Digital Token Identifier	Token Type: Auxiliary Digital Token Auxiliary Digital Token Mechanism: Algorand Standard Asset (ASA)
B.15	Personal data flag	YES
B.16	LEI eligibility	YES
B.17	Home Member state	Netherlands
B.18	Host Member states	Austria Belgium

		Bulgaria Croatia Cyprus Czech Republic Denmark Estonia Finland France Germany Greece Hungary Iceland Ireland Italy Latvia Liechtenstein Lithuania Luxembourg Malta Norway Poland Portugal Romania Slovakia Slovenia Spain Sweden
--	--	---

	PART C - INFORMATION ABOUT THE OFFER TO THE	
--	--	--

	PUBLIC OF THE E-MONEY TOKEN OR ITS ADMISSION TO TRADING	
--	--	--

C.1	Public Offering or Trading	This White Paper concerns the offer to the public of EURD EMT (OTPC)
C.2	Number of units	Quantoz Payments has implemented a predefined cap of 10550000000000 (10.55T) tokens, representing the Euro M1 Money Supply in October 2023, on the number of EURD EMT units available for public offering or trading. The EURD EMT has 2 decimal positions (cents). The circulation of EURD EMT is directly linked to the euros held in reserve, ensuring a 1:1 backing ratio. At any moment, the number of EURD EMTs in circulation and its holders can be verified through the Algorand Explorer at https://allo.info/asset/1221682136/token along with regular reserve attestations and public disclosures.
C.3	Trading Platforms name	N/A
C.4	Trading Platforms Market Identifier Code (MIC)	N/A
C.5	Applicable law	The use of EURD EMTs is subject to the laws of the Netherlands (the " Applicable Laws ").
C.6	Competent court	Any legal action or proceeding arising from using EURD EMTs shall be initiated before the District Court of Midden-Nederland in Utrecht, the Netherlands, except where Applicable Laws require providing for an alternative form of dispute resolution.

	PART D - INFORMATION ON THE RIGHTS AND OBLIGATIONS ATTACHED TO E-MONEY TOKENS	
--	--	--

D.1	Holder's rights and Obligations	Customers can fund their Customer Hosted Wallet with transferring fiat euro from a euro bank account in their name to Quantoz Payments, which on its turn issues EURD EMTs to the Customer Hosted Wallets. Both consumers and merchants can redeem EURD EMTs back to fiat euro, receiving the corresponding value in their registered bank accounts. Where consumers wish to redeem more EURD EMTs than they have acquired from Quantoz Payments, the redemption process may be subject to additional KYC and AML controls about which they will be informed through the Quantoz Payments applications. Business users may exchange any EURD EMTs back for fiat money. The Quantoz Payments applications can be used for redeeming EURD. Holders of the EURD have the following rights: • Redemption at par value: holders retain the right to redeem their EURD EMTs for the equivalent value in fiat currency at any time. To initiate a redemption, holders must initiate a transfer of the redemption amount of EURD EMTs to a designated blockchain address of Quantoz Payments. Consequently, Quantoz Payments will pay the corresponding amount of fiat euro to the Customer's bank account. In accordance with the EURD EMT Terms of Service, Customers may also opt to redeem their EURD EMT in EURD E-money. Such amount of EURD E-money will be credited to the Customer's Managed Account upon Quantoz receiving the redemption amount of EURD EMTs. • Access to the EURD Interface through which holders can receive and redeem EURD EMTs • Businesses can onboard a business account with Quantoz Payments via the Quantoz Payments webpage https://quantozpay.com/businesses/. • Use of the web portal of Quantoz Payments to add and manage Customer Hosted Wallets, of which the holder manage the private key themselves. Quantoz Payments does not pay the transaction fees of such wallets, and holders must take care of the Algorand blockchain transaction fee themselves. New consumer customers by default have the Tier 1 daily and monthly transaction limits. Higher Tier levels with higher transaction limits may require the customer to provide additional compliance information. The information the customer needs to provide is communicated to the customer through the Quantoz Payments App. The daily and monthly limits of the different levels
-----	---------------------------------	--

		are available at the web page of Quantoz Payments (https://quantozpay.com/terms/) • Businesses may redeem any amount in EURD EMTs for fiat money, including EURD EMTs not acquired directly from Quantoz Payments (but obtained from other customers). • Where consumers wish to redeem more EURD EMTs than they have acquired from Quantoz Payments, the redemption process may be subject to additional controls. The following restrictions apply: Quantoz Payments accepts private customers with residence in the EEA, UK and Switzerland or businesses registered in the EEA, UK and Switzerland. • Quantoz Payments exclusively accepts payments from IBAN in the name of the user; cash transactions are not allowed. • Only fiat euro is accepted for funding; other fiat currencies are not accepted. • Bank accounts from outside the Single Euro Payments Area (SEPA) are not accepted for transactions. Holders of the EURD EMTs have the following obligations: • They will hold and use EURD EMTs in compliance with this white paper and the applicable laws. • They are not a restricted person, appearing on the OFAC, UN, EU or Dutch Sanction lists, and are not holding EURD EMTs on behalf of a restricted person. • They will not offer, sell, trade, pledge, convert, transfer, or deliver, either directly or indirectly, EURD EMTs, at any time within the United States. • Only Customers with valid KYC/AML and verified bank details can redeem their EURD EMTs. Users are obliged to provide Quantoz Payments with adequate information in relation to Know Your Customer (KYC) and Anti-Money Laundering (AML) requirements. • Customers maintain sole control of their account credentials, ensure secure device settings and promptly notify Quantoz Payments of any loss or breach of such credentials.
--	--	---

		• Comply with all tax-reporting duties arising from holding or using EURD EMTs; Quantoz Payments does not provide tax advice. • In addition, all EURD EMT holders must comply with all applicable laws, including, but not limited to, the strict and absolute prohibition of the use of EURD EMT for money laundering, terrorist financing or any other financial crime. Quantoz Payments is an Electronic Money Institution and will and must report unusual transactions to the relevant authorities (Financial Intelligence Unit in the Netherlands). Quantoz Payments has the right to block EURD EMT addresses in case of violation of the mentioned obligations. Quantoz Payments may monitor the EURD EMT transactions and tests them against the relevant legislation such as AML and Sanction Law. Although Quantoz Payments may place the EURD EMT reserves in interest-bearing accounts or other yield-generating instruments, EURD EMT holders agree that they have no claim to any interest or returns earned from these funds. EURD EMT itself does not generate interest or returns for holders; it solely represents the right to redeem EURD EMTs for an equivalent amount in euros, as outlined in this white paper. EURD EMT transactions are irreversible. Once a holder sends EURD EMTs to a specific address, they accept losing access to or any claim on those EURD EMTs. This may occur if, for example, (i) the address was entered incorrectly, (ii) the address belongs to an entity unwilling to return the EURD EMT, or (iii) the entity may return the EURD EMT but requires certain actions, such as verifying the holder's identity. To clarify, Quantoz Payments has no obligation to track, verify, or determine the origin of EURD EMT balances or any associated security claims, unless required by applicable laws. Quantoz also does not initiate or execute any EURD EMT transactions other than issuance and redemption to Customer Hosted Wallets. For more details regarding the rights and obligations of EURD EMT holders, please refer to https://quantozpay.com/terms/.
D.2	Conditions of modifications of rights and obligations	Quantoz Payments reserves the right to periodically amend these rights and obligations. EURD EMT holders will be informed of such changes via updates to this white paper, the Redemption Policy on Quantoz' website, or any other valid communication channel. The rights and obligations of EURD EMT users may be subject to modification for example under the following conditions:

		• Compliance with applicable laws and regulations: changes may occur to ensure adherence to the prevailing laws and regulations within the operational territory of Quantoz Payments. • Improvement of services: modifications may be made to enhance the quality and efficiency of services provided to EURD EMT users, ensuring a better user experience and satisfaction. • Enhancing Security Measures: updates may be implemented to bolster security protocols, safeguarding user assets and data against evolving threats in the digital landscape. • A Force Majeure Event. As a result, it becomes impossible for Quantoz Payments to fulfil its obligations and the continuation of EURD EMT becomes definitively impossible. Proposed changes will be announced to holders with a 30-day notice period, allowing them time to review and prepare for the updates. However, if changes are required by a legally binding request from a competent authority or deemed necessary by Quantoz Payments to meet regulatory, legal, or compliance obligations, they will take effect immediately. Such immediate modifications will be communicated promptly, just as with other changes.
D.3	Description of the rights of the holders	Quantoz Payments upholds high standards for safe and sound financial management to mitigate risks of insolvency. In situations of financial distress or economic uncertainty, Quantoz Payments has established contingency plans to ensure the continuity of its operations, including the issuance of EURD EMTs, and to protect the rights of EURD EMT holders. If Quantoz Payments is unable to meet its obligations or faces insolvency, EURD EMTs reserves are safeguarded in full compliance with applicable laws. Specifically, funds received in exchange for the issuance of EURD EMTs are shielded from any claims by other creditors of Quantoz Payments, including during enforcement or insolvency proceedings. In the event of financial distress or insolvency, Quantoz Payments will activate its Recovery and/or Redemption Plan, enabling EURD EMT holders to exercise their redemption rights, as detailed in Sections D.4 and D.5 below.

D.4	Rights in implementation of recovery plan	Quantoz Payments might take the following measurements to execute the recovery plan. • Restriction on Inflow of new customers As part of the recovery plan, Quantoz Payments might limit the number of new customers. This will help Quantoz Payments manage its resources better and keep the operations stable during challenging times. • Limitation on customer volume Quantoz Payments has the contractual right to limit the amount of funding its customers can do. This helps Quantoz Payments to manage its financial responsibilities and reduce potential risks. Quantoz Payments is committed to quickly inform customers about any such limits to ensure transparency and support effective cooperation. Other measurements may include • Liquidity fees on redemptions • Daily limits on the amount of EURD EMT that can be redeemed, set both at an aggregate level (e.g., as a percentage of the total tokens issued) and at the individual Customer Hosted Wallet level • Suspension of redemptions, as a last resort EURD EMT holders will be promptly informed of any such restrictions via the Quantoz Payments website. The recovery plan will be published within six months after publication of this white paper. This white paper will be updated to reflect the approved recovery plan, once regulatory authorization has been received.
D.5	Rights in implementation of redemption plan	Depending on the specific circumstances under which the redemption plan is triggered, Quantoz Payments may need to impose restrictions on the redemption of EURD EMT. EURD EMT holders will be notified of any such restrictions on the Quantoz Payments website. The redemption plan will be published within six months after publication of this white paper. This white paper will be updated to reflect the approved redemption plan, once regulatory authorization has been received.
D.6	Complaint Submission Contact	Customers can file a complaint by sending an email to the following email address: support@quantozpay.com, with the word

		“complaint” in the subject. To handle complaints in the best possible way, the following information will be requested: • Full name of the Customer • The Customer Account Code provided by the Quantoz Payments • E-mail address • A description of the complaint
D.7	Complaints Handling Procedures	Upon receipt of a complaint the Staff involved with customer support will: • Assess the information sent by the Customer and confirm receipt of the complaint by email and informs the Customer within which period the complaint will be dealt with (which timeframe will in principle be 15 working days from the date of receipt of the complaint, save in exceptional circumstances). • The confirmation of receipt may – if applicable – comprise a request for additional information required to complete and commence handling the complaint. In such case the timeframe will commence after Quantoz Payments has received the additional information. • The complaint will be analyzed by the Customer support desk and relevant departments of Quantoz Payments. • Ultimately within 15 working days from the date of receipt of the complaint (or receipt of the additional information as applicable), inform the Customer of the outcome thereof, including possible compensation of damages incurred. This period may be extended up to 35 working days (in total) in exceptional circumstances which are not a result of an act or omission by Quantoz Payments, provided the Customer has been informed on the reasons for extension of the response period and agreed thereto. • The Customer will be given the opportunity to respond to the outcome of the complaints process within 10 working days. In case such response requires additional research or analysis into the complaint, the complaint will be re-assessed taking into account the information provided by the Customer. Quantoz Payments will send a final response to the Customer within 10 working days after having received the Customer’s response. • The Customer will be informed that Quantoz Payments has finalized handling the complaint and that the complaints handling procedure will be closed. The Customer will also

		be informed and about the possibility of initiating legal proceedings through a civil court. • Close the complaint handling process and record the information and correspondence with respect to the complaint. Quantoz Payments has a complaints procedure in place with a view to resolve complaints in an efficient, effective, and professional manner and to minimize complaints and claims. The complaints procedure is available on the Quantoz Payments's website: https://quantozpay.com/complaints/.
D.8	Dispute Resolution Mechanism	Quantoz Payments has a clear dispute resolution process for EURD EMT holders. In the event of a dispute, holders should submit their concerns in writing via email or official channels. The dispute will be promptly acknowledged and documented by a designated team member and then thoroughly investigated with input from relevant departments. Quantoz Payments's goal is to provide an initial response within ten business days outlining the steps being taken. If further investigation is required, holders will be kept informed of progress and timelines. If dissatisfied with the initial resolution, holders may escalate the matter to senior management for further review, ensuring higher level involvement for a fair outcome. If internal efforts fail to resolve the issue, holders may seek external resolution through legal channels or alternative dispute resolution methods, such as arbitration or mediation, as set forth in Quantoz Payments' EURD EMT Terms of Service. In case of consumer customers, such customers may also file a complaint with the Dutch Financial Services Complaints Tribunal (<i>Klachteninstituut Financiële Dienstverlening</i>). Committed to transparency, fairness and efficiency, Quantoz Payments maintains detailed records of each dispute in order to improve service and address systemic issues. This structured approach ensures that all disputes are handled professionally and promptly, and that the rights and interests of EURD EMT holders are protected.
D.9	Token Value Protection Schemes	YES
D.10	Token Value Protection	The amount of issued EURD EMTs has a 1:1 correspondence with the fiat euro amounts and backed by a 102% reserve of which at

	Schemes Description	least 30% is always deposited in a trusted bank account managed by the Quantoz Foundation. The remaining funds are invested in secure, low-risk assets that qualify as highly liquid financial instruments with minimal market risk, credit risk and concentration risk, in accordance with Article 54(b) in connection with Article 38(1) of MiCAR and are denominated in euro. In the event of insolvency or financial instability of Quantoz Payments, these reserves are specifically designated to meet EURD EMT holders' redemption requests at par value, thereby protecting the value of the EURD EMTs. Regular certifications verify the adequacy of these reserves, increasing transparency and trust.
D.11	Compensation Schemes	No
D.12	Compensation Schemes Description	N/A
D.13	Applicable law	The use of EURD EMTs is subject to the laws of the Netherlands (the " Applicable Laws ").
D.14	Competent court	Any legal action or proceeding arising from using EURD EMT shall be initiated before the District Court of Midden-Nederland in Utrecht, the Netherlands, except where Applicable Laws require providing for an alternative form of dispute resolution.

	PART E - INFORMATION ON THE UNDERLYING TECHNOLOGY	
--	--	--

E.1	Distributed ledger technology	The EURD EMTs of Quantoz Payments are issued on the Algorand blockchain. The Algorand blockchain is a highly scalable, secure, and energy-efficient platform designed to support decentralized applications and a broad range of digital assets. It was founded by cryptographer and MIT professor Silvio Micali, with the goal of addressing the "blockchain trilemma"—achieving security, scalability, and decentralization simultaneously. Key Features of the Algorand Blockchain:
-----	-------------------------------	--

		• Pure Proof-of-Stake (PPoS) Consensus: Algorand uses a unique consensus mechanism called Pure Proof-of-Stake, which ensures security and decentralization without sacrificing speed. PPoS relies on the random selection of network participants to propose and validate new blocks, making it highly resistant to malicious activity and reducing the computational burden compared to traditional Proof-of-Work systems. • Fast and Scalable Transactions: Algorand is known for its low transaction latency and high throughput, with the ability to handle thousands of transactions per second. Block finality is achieved within seconds, providing users with confidence that transactions are completed without delay or risk of reversal. • Energy Efficiency: Due to its PPoS mechanism, Algorand is environmentally friendly, requiring minimal energy compared to other blockchains like Bitcoin and Ethereum. This efficiency aligns with Algorand's commitment to a sustainable blockchain ecosystem. Quantoz Payments may also decide to issue EURD EMTs on other distributed ledgers in the future. Quantoz Payments has neither the ability nor the obligation to prevent or address attacks or resolve any technical issues that may occur on any blockchain supporting EURD EMTs.
E.2	Protocols and technical standards	Algorand Standard Asset (ASA) tokens. ASA tokens are a framework within the Algorand blockchain for creating and managing on-chain assets. ASA tokens allow users to tokenize almost any type of asset directly on the Algorand blockchain, including stablecoins. ASA features include: • Customizable Asset Parameters: ASA creators can define parameters such as asset name, total supply, decimals, and asset metadata. They can also configure permissions like freezing, clawback (reclaiming assets), and whether the asset is divisible or not. • Native Layer-1 Support: ASAs are native to the Algorand Layer-1 protocol, meaning they're built directly into the blockchain's base layer. This integration ensures security, high-speed transactions, and low fees. • Permissioned and Permissionless Options: ASAs can be configured to suit different needs, supporting both permissionless (open to all) and permissioned (restricted access) assets, which is useful for regulatory compliance.

		• Flexible Asset Management: ASAs can be managed by designated accounts, enabling functions like minting, freezing, or clawback, giving issuers control over the asset's lifecycle. • High Throughput and Scalability: Built on Algorand's Pure Proof-of-Stake (PPoS) blockchain, ASAs benefit from Algorand's high-speed, scalable, and energy-efficient platform.
E.3	Technology Used	EURD uses Quantoz Institutional-grade ISO 27001 certified and ISAE 3402 compliant NEXUS EMI technology, a resilient cost-efficient SaaS infrastructure, developed by Quantoz Technology and managed by Quantoz Blockchain Services that has been in production since 2016. The NEXUS EMI platform supports the execution of the EURD EMT issuing and redemptions on the Algorand blockchain for Quantoz Payments applications. NEXUS enables businesses to easily integrate blockchain infrastructure into their existing financial applications and to manage multiple tokens like tokenized assets and digital money, without the need to deal with the technical aspects involved. Using NEXUS, Quantoz Payments has defined a "virtual private payment network" (VPPN) for EURD EMTs, in a permissionless blockchain environment. A VPPN enables payments <i>only</i> between Customer Hosted Wallets of users that have signed up with Quantoz Payments and prevents that unknown users can hold EURD EMTs. Quantoz Payments' backend, web portal, APIs and mobile app are propriety applications of Quantoz Payments.
E.4	Purchaser's technical requirements	EURD EMTs may only be held in whitelisted Customer Hosted Wallets. A Customer wishing to link its Customer Hosted Wallet to receive EURD EMT must submit the blockchain address of its wallet for whitelisting in the portal. Whitelisting links the wallet to the verified customer record; anonymous addresses are not permitted, ensuring EURD EMTs never leave the closed-loop infrastructure. EURD EMTs (Algorand Standard Assets) are minted only when acquired by a Customer with a linked whitelisted Customer Hosted Wallet. The holder can: • Acquire EURD EMTs directly: fund with euros and request delivery to the whitelisted wallet; Quantoz mints the corresponding EURD EMTs and transfers these on-chain to the respective whitelisted Customer Hosted Wallet from Quantoz's issuing address, or

		Convert an existing EURD E-money balance: Quantoz debits the internal ledger balance of the Customer's Managed Account where it holds EURD E-money, mints the corresponding amount of EURD EMTs and delivers them to the wallet. EURD EMTs can move only between whitelisted Customer Hosted Wallets. By offering both EURD E-money in internal EMI ledger accounts and EURD EMTs in whitelisted Customer Hosted Wallets, Quantoz provides a flexible, interoperable framework that lets each user choose the level of control and functionality they need—while every unit remains fully backed, traceable and redeemable under DNB supervision.
E.5	Consensus Mechanism	The Algorand blockchain uses a decentralized Byzantine Agreement protocol that leverages pure proof of stake (Pure PoS). The decentralized Byzantine Agreement protocol is a method for multiple computers (nodes) in a network to agree on a single truth, even if some nodes are faulty or malicious. Each node shares information and votes on the consensus. Through multiple rounds of communication and majority voting, honest nodes eventually converge on the same agreement, ensuring the system's reliability and security despite potential disruptions or false information from some participants. This means that it can tolerate malicious users, achieving consensus without a central authority, as long as a supermajority of the stake is in non-malicious hands. This protocol is very fast and requires minimal computational power per node, giving it the ability to finalize transactions efficiently. More information about the consensus mechanism is available on the Algorand website.
E.6	Incentive Mechanisms and Applicable Fees	The Algorand blockchain uses a decentralized Byzantine Agreement protocol that leverages Pure Proof of Stake (PPoS). In PPoS, users are randomly selected to propose and validate blocks based on their stake in the network. This ensures a decentralized and secure transaction validation process. As for fees, Algorand employs a fee model that is designed to be low-cost and predictable. The standard transaction fee on the Algorand network is a fraction of Algos, the native cryptocurrency of the network, and it typically remains constant regardless of network congestion. For customer hosted accounts, or wallets, the user

		must pay the Algorand blockchain transaction fee (currently 0,001 Algo).
E.7	Use of own Distributed ledger technology	No
E.8	DLT Functionality Description	N/A
E.9	Audit	The EURD EMTs of Quantoz Payments are issued on the Algorand blockchain, a decentralized platform known for its high performance, security, and scalability. As part of Quantoz Payments's commitment to ensuring the integrity and reliability of its e-money system, a comprehensive audit of the Algorand blockchain technology was conducted. The audit verified that Algorand's layered architecture, and cryptographic primitives ensure the confidentiality, integrity, and availability of transactions and data on the blockchain. A more comprehensive risk analysis of the Algorand blockchain is provided in section 6.3. Since 2020, Quantoz is an ISO/IEC 27001 certified company. As such an external audit for the NEXUS technology is performed every year. With this ISO certificate, Quantoz demonstrates that it has implemented an information security management system in which all processes and procedures have been carefully designed and tested according to the international ISO standards.
E.10	Audit outcome	A publication about the blockchain assessment is available on the Quantoz Technology website https://quantoz.com/publications/which-ledgers-fit-for-token-applications/

	PART G - INFORMATION ON THE SUSTAINABILITY INDICATORS IN RELATION TO ADVERSE IMPACT ON THE CLIMATE AND OTHER	
--	---	--

	ENVIRONMENT-RELATED ADVERSE IMPACTS	
--	--	--

G.1	Adverse impacts on climate and other environment-related adverse impacts	Quantoz Payments is committed to providing clear and detailed information on the environmental impacts of its operations. In the period October 23, 2023, the issuance date of the first EURD EMT, until June 1, 2024, the completion date of the Quantoz Payments MiCAR white paper, a total of 74 EURD EMT transactions on the Algorand blockchain were recorded. These transactions resulted in a total energy consumption of 0,000592 kWh *). *) The estimate for the electricity consumption per transaction for contemporary throughput of Algorand consensus is 0,000008 kWh/transaction. The calculation method is available on the Algorand website: https://algorandtechnologies.com/news/sustainable-blockchain-calculating-the-carbon-footprint Quantoz Payments' EURD EMT is available on the Algorand blockchain, which uses a Proof of Stake (PoS) consensus mechanism.
-----	--	--

	Table 1. Climate and other environment related indicators for EURD EMT	
--	---	--

Type	Adverse Sustainability Indicator	EURD EMT on Algorand
Energy	Energy consumption	Total amount of energy used in kWh, for the period October 23, 2023, the issuance date of the first EURD EMT, until June 1, 2024, the completion date of the Quantoz Payments MiCAR white paper for the validation of transactions and the maintenance of the integrity of the distributed ledger of transactions: 0,000592 kWh.