

Company

**Luminary**

Version #

**Whitepaper v 1.1**

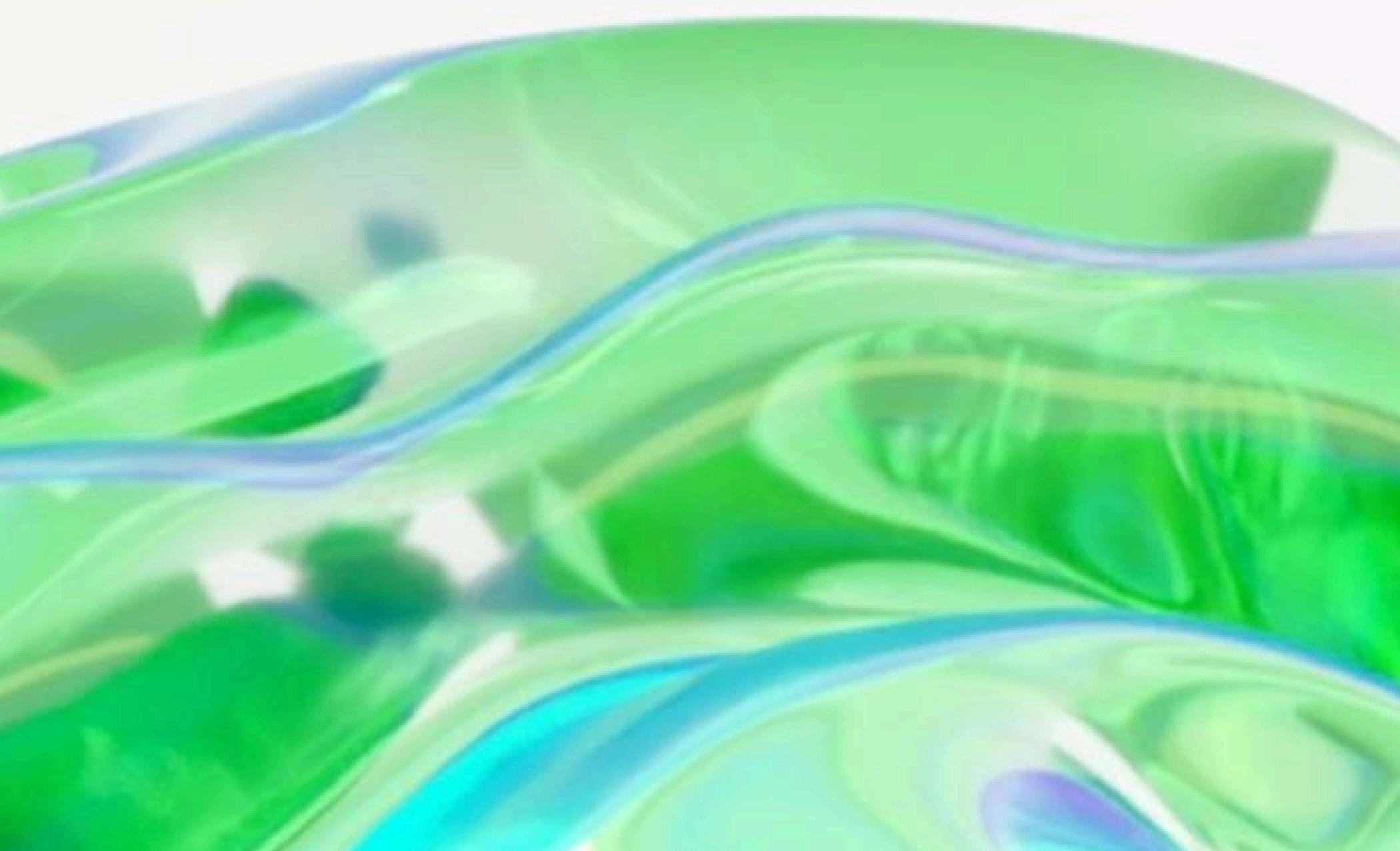
Date

**March 2026**

**Luminary**

# **Luminary Token**

Utility Governance and Capital Efficiency



**\$LUMI TOKEN**

**White Paper**

**GENERAL INFORMATION**

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01 **DATE OF NOTIFICATION**

2026-02-20

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, MiCAR 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), of Regulation (EU) 2023/1114**

The crypto-asset referred to in this 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), point (e), (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**

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**

The crypto-asset is a digital utility token intended for use within the Luminary ecosystem. It has a fixed maximum supply of 5,000,000,000 tokens and is issued on a public blockchain. The functionalities described in this white paper are planned and are not fully operational at the date of publication.

The crypto-asset is intended to enable holders, subject to eligibility and applicable legal requirements, to access selected platform features and service environments and, where supported, to use the token as an optional method of payment for certain platform-related services. Holders may also participate in non-binding community feedback or signalling mechanisms. These mechanisms are consultative only and do not confer governance or decision-making rights.

The crypto-asset does not grant ownership, profit participation, dividend, redemption, or other financial rights in relation to the issuer or any affiliated entity. Holders are responsible for complying with applicable laws and for safeguarding their private keys and wallet credentials.

Rights and utilities may be modified for legal, technical, security, or operational reasons. The crypto-asset is technically transferable on the underlying blockchain; however, access to trading venues and liquidity may depend on external factors, and no assurance is given that an active market will develop.

## **09 Information about the quality and quantity of goods or services to which the utility tokens give access and restrictions on the transferability**

The crypto-asset is a utility token that provides access to selected digital services and functionalities within the Luminary ecosystem, subject to legal, regulatory, technical, and eligibility conditions.

The goods and services accessible through the crypto-asset consist of platform features, service tiers, and related digital functionalities. The crypto-asset may also be used, where supported, as an optional method for settling certain platform-related service fees and for participating in non-binding community feedback mechanisms. Such participation is advisory only and does not confer governance or decision-making rights.

The scope, availability, quality, and quantity of goods or services accessible through the crypto-asset may vary over time and may depend on regulatory permissions, technical capacity, and third-party participation. Holding the crypto-asset does not create an enforceable right or entitlement to receive any specific good or service.

The crypto-asset is technically transferable on the underlying blockchain between compatible wallets. However, actual transferability may be subject to restrictions, including vesting or lock-up arrangements applicable to certain token allocations, requirements imposed by trading venues or service providers, and legal or regulatory limitations applicable to specific jurisdictions or persons.

## 10 Key information about the offer to the public or admission to trading

The crypto-asset is offered to the public through a structured token sale conducted by the issuer. The offer is organised in multiple presale phases. During the presale phases, tokens are offered at predefined prices as described in Section E.8. Outside these phases, no fixed issue price applies. Earlier phases are offered at a lower price than later phases. Subscriptions are accepted during the applicable subscription periods and only up to the token allocation assigned to each phase.

The issuer has not set a fixed overall fundraising target. The total number of crypto-assets offered to the public is limited by the maximum token supply and the allocation percentages described in the crypto-asset white paper. No subscription fee is charged by the issuer.

The crypto-asset is offered to the public without restriction as to the investor category, subject to applicable legal and regulatory requirements.

No crypto-asset service provider is designated as being in charge of the placing of the crypto-assets, and the offer is conducted without a firm commitment basis.

As of the date of this crypto-asset white paper, the crypto-asset has not been admitted to trading on any centralised or decentralised trading platform. The issuer has not made any binding commitment regarding admission to trading. Any future admission to trading would be subject to the independent listing decisions of trading platform operators, applicable legal and regulatory requirements, and prevailing market conditions.

### **Offer Disclaimer**

The material presented in this White Paper is not intended as business, legal, financial, or tax advice. It must not be viewed as a recommendation by the Issuer, its officers, employees, or agents for any person to acquire or trade \$LUMI tokens. Any decision to purchase \$LUMI should be made solely on the basis of this White Paper and any officially released addenda or supplements. Except where required by applicable law, the Issuer assumes no obligation to update or revise the contents of this

document. Readers should therefore not rely on the information contained herein after the date of publication. Purchasers should rely on the content of this white paper as a whole when making an informed decision. No external statements or representations should be considered authorized unless explicitly included in this document.

**A. PART A - INFORMATION ABOUT THE OFFEROR OR THE PERSON SEEKING ADMISSION TO TRADING**

**A.1 Name**

Luminary Digital Ltd

**A.2 Legal Form**

Business Company limited by shares

**A.3 Registered Address**

Intershore Chambers, P.O. Box 4342, Road Town, Tortola, British Virgin Islands

**A.4 Head Office**

Intershore Chambers, P.O. Box 4342, Road Town, Tortola, British Virgin Islands

**A.5 Registration Date**

2025-12-22

**A.6 Legal Entity Identifier**

N/A

**A.7 Another identifier required pursuant to applicable national law**

ISIN: XTC6QGBH5J9

**A.8 Contact Telephone Number**

+34 744 794 649

**A.9 E-mail Address**

[gleb.k@luminaryinc.com](mailto:gleb.k@luminaryinc.com)

**A.10 Response Time (Days)**

15

**A.11 Parent Company**

No parent company.

**A.12 Members of the Management Body**

Rosalie Cabus Chang-Ko – Shareholder and Director

Business address: Anse Des Genets, Mahe, Seychelles

**A.13 Business Activity**

Luminary Digital Ltd acts as the issuer of the LUMI utility token within the Luminary ecosystem. Its principal business activities consist of the issuance and administration of the LUMI token, coordination of token-related technical and operational matters, and support of ecosystem development activities associated with the Luminary platform. The company does not provide regulated financial services, does not accept deposits, and does not conduct lending, payment services, or investment activities. Any regulated services accessible within the broader Luminary ecosystem are provided exclusively by duly authorised and licensed third-party entities or affiliated entities operating under applicable regulatory frameworks. Luminary Digital Ltd is not a bank, does not hold a banking licence, and does not conduct activities requiring authorisation as a credit institution. Any future regulatory authorisations, if sought, will be disclosed in accordance with applicable law.

**A.14 Parent Company Business Activity**

N/A

**A.15 Newly Established**

true

**A.16 Financial Condition for the past three Years**

N/A

**A.17 Financial Condition Since Registration**

N/A

**B. PART B - INFORMATION ABOUT THE ISSUER, IF DIFFERENT FROM THE OFFEROR OR PERSON SEEKING  
ADMISSION TO TRADING**

**B.1 Issuer different from offeror or person seeking admission to trading**

false

**C. 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**

N/A

**C.4 Head Office**

N/A

**C.5 Registration Date**

N/A

**C.6 Legal Entity Identifier**

N/A

**C.7 Another Identifier Required Pursuant to Applicable National Law**

N/A

**C.8 Parent Company**

N/A

**C.9 Reason for Crypto-Asset White Paper Preparation**

N/A

**C.10 Members of the Management Body**

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

**D. PART D - INFORMATION ABOUT OTHER TOKEN PROJECT**

**D.1 Crypto-Asset Project Name**

Luminary

**D.2 Crypto-Assets Name**

Luminary Token

**D.3 Abbreviation**

SLUMI

**D.4 Crypto-Asset Project Description**

The Luminary crypto-asset project relates to the development of a digital platform that uses a blockchain-based utility token to provide access to selected non-financial digital services and platform functionalities. The project supports a digital ecosystem in which users may access platform features, service tiers, and structured community feedback mechanisms through the use of the crypto-asset. The token is intended to function as a utility instrument enabling structured access to platform services and supporting user engagement within the Luminary ecosystem. Any regulated services accessible through the broader ecosystem are provided exclusively by duly licensed third-party entities and remain legally and operationally separate from the issuer and the crypto-asset.

**D.5 Details of all natural or legal persons involved in the implementation of the crypto-asset project**

The following natural persons are involved in the implementation of the crypto-asset project in the capacity of Advisors:

Alexander Chernyshev – Advisor

Business address: Claridenstrasse 36, 8002 Zurich, Switzerland

Domicile of company: Virgin Islands (British)

Platon Zakuterins – Advisor

Business address: Av. d'Ausiàs March, 134, Quatre Carreres, 46026 València, Spain

Domicile of company: Virgin Islands (British)

Oscar So – Advisor

Business address: RM 07, 45/F, Enterprise Square 3, 39 Wang Chiu Road, Kowloon Bay, Hong Kong

Domicile of company: Virgin Islands (British)

Mihail Iatuha – Advisor

Business address: 29 Finsbury Circus, EC2M5SQ, London, United Kingdom

Domicile of company: Virgin Islands (British)

Gleb Kurovskiy – Advisor

Business address: Claridenstrasse 36, 8002 Zurich, Switzerland

Domicile of company: Virgin Islands (British)

Svetlana Cecika – Advisor

Business address: Av. d'Ausiàs March, 134, Quatre Carreres, 46026 València, Spain

Domicile of company: Virgin Islands (British)

Ekaterina Gurina – Advisor

Business address: Av. d'Ausiàs March, 134, Quatre Carreres, 46026 València, Spain

Domicile of company: Virgin Islands (British)

Sergii Vakula – Advisor

Business address: 29 Finsbury Circus, EC2M5SQ, London, United Kingdom

Domicile of company: Virgin Islands (British)

Anton Borozdin – Advisor

Business address: Av. d'Ausiàs March, 134, Quatre Carreres, 46026 València, Spain

Domicile of company: Virgin Islands (British)

Vasilijs Ogromnovs – Advisor

Business address: Marupes nov., Babites pag., Pinki, Pienenu iela 1, Latvia

Domicile of company: Virgin Islands (British)

Vinicius Barriera – Advisor

Business address: 422 Richards Street, Suite 170, Vancouver BC, V6B 2Z4, Canada

Domicile of company: Virgin Islands (British)

Irina Evdokimova – Advisor

Business address: Unit GA-00-SZ-L1-RT-208, Level 1, Gate Avenue – South Zone, International Financial Centre, Dubai, United Arab Emirates

Domicile of company: Virgin Islands (British)

#### D.6 **Utility Token Classification**

True

#### D.7 **Key Features of Goods/Services for Utility Token Projects**

The features described below represent intended functionalities and will be made available following implementation in accordance with the project roadmap. The crypto-asset is designed to provide access to selected, non-financial platform-related features within the Luminary ecosystem, subject to eligibility criteria, technical availability, and applicable legal requirements. The goods or services accessible through the crypto-asset may include access to specific digital platform functionalities and service tiers, the optional use of the crypto-asset for settling certain platform-related service fees where technically supported, and participation in non-binding community feedback and signalling mechanisms related to product development. The crypto-asset does not confer ownership, equity, governance rights, or any entitlement to financial returns, profit-sharing, interest, or dividends, and it does not provide access to regulated financial products or services. Access to goods or services may be subject to jurisdictional restrictions, technical limitations, and the conditions applicable to the relevant platform features.

#### D.8 **Plans for the Token**

The crypto-asset project is being developed in stages. The Token Generation Event marks the commencement of broader token distribution; however, a portion of the total supply has already been

minted prior to the TGE, and additional tokens will be minted progressively in accordance with the allocation and vesting framework. As of the date of this white paper, the functionalities described for the crypto-asset are not yet operational and are planned to be implemented following the conclusion of the presale. At a high level, access to the Luminary platform is expected to be introduced approximately one to two months after the end of the presale; governance-related signalling functionality is expected to be introduced approximately two to three months after the end of the presale; and optional payment functionality enabling the use of the crypto-asset for selected platform services is expected to be introduced approximately three to four months after the end of the presale. These timelines are indicative only and remain subject to technical development, regulatory considerations, and operational readiness. In the short to medium term, the crypto-asset is intended to function as an access and usage token, enabling holders, subject to applicable terms and eligibility criteria, to interact with selected platform features, service tiers, and ecosystem functionalities. The crypto-asset may also be used, on an optional basis, to settle certain platform-related service fees, where such functionality is supported. The crypto-asset is also intended to support structured, non-binding community feedback and signalling mechanisms, allowing holders to provide advisory input on ecosystem development and feature prioritisation. Such mechanisms do not confer governance authority or decision-making rights. Any future extensions or modifications to the crypto-asset's functionality will depend on regulatory considerations, technical feasibility, and internal governance decisions and will be disclosed in accordance with applicable legal requirements.

#### D.9 **Resource Allocation**

The token supply is allocated across high-level categories intended to support the development and operation of the Luminary ecosystem, including ecosystem development and technical maintenance, operational and administrative reserves, community engagement initiatives including limited distributions, and platform development and service support activities.

#### D.10 **Planned Use of Collected Funds or Other Tokens**

Any funds or crypto-assets collected in connection with the distribution of the crypto-asset are intended to be used to support the development, operation, and expansion of the Luminary ecosystem and the services made available through appropriately licensed partners. Collected funds are intended to be allocated as follows: approximately 15% to liquidity reserves to support operational liquidity and platform-related activities; approximately 30% to technology development and platform upgrades, including infrastructure development, maintenance, and technical improvements; approximately 45% to branding, marketing, and ecosystem growth, including user acquisition and ecosystem expansion initiatives; and approximately 10% to a general reserve fund intended to support long-term operational stability and responsible growth. These allocations represent intended distribution categories within the fixed maximum supply and do not indicate that tokens have already been distributed or assigned to

specific wallets as of the date of publication. The allocation of collected funds is subject to internal budgeting and governance processes and is not automated through on-chain mechanisms. Collected funds or reserve tokens are not intended to be used to provide financial returns, yield, interest, or investment-related benefits to token holders. As of the date of this white paper, 154,285,714 tokens have been minted. No tokens have been allocated, distributed, or transferred to team members, treasury wallets, liquidity reserves, or other internal accounts. Any future allocation or distribution of tokens will occur in accordance with the published tokenomics and applicable vesting schedules.

**E. PART E - INFORMATION ABOUT OFFER TO PUBLIC OF OTHER TOKENS OR THEIR ADMISSION TO TRADING**

**E.1 Public Offering or Admission to Trading**

OTPC

**E.2 Reasons for Public Offer or Admission to Trading**

This white paper is notified in connection with an offer to the public (OTPC). The issuer also intends to seek admission to trading to facilitate liquidity, subject to independent listing decisions. The offer of the crypto-asset to the public is intended to support the development, operation, and expansion of the issuer's platform and related infrastructure. Funds are intended to be raised through presale phases and any subsequent public offering of the crypto-asset. The funds or other crypto-assets collected through the offer are planned to be used to finance technology development, operational readiness, liquidity management, marketing and ecosystem growth initiatives, and the establishment of appropriate reserves to support the long-term sustainability of the project. The offer is not conducted for the purpose of providing investment returns, yield, or profit participation to purchasers, and the crypto-asset is not offered as a financial instrument or investment product.

**E.3 Fundraising Target**

0

**E.4 Minimum Subscription Goals**

0,00

**E.5 Maximum Subscription Goals**

0,00

**E.6 Oversubscription Acceptance**

false

**E.7 Oversubscription Allocation**

N/A

**Issue Price Details**

**E.8 Issue Price**

0,150

**E.9 Official Currency or Any Other Crypto-Assets Determining the Issue Price**

USD

**E.10 Subscription Fee**

0,00

**E.11 Offer Price Determination Method**

The offer price of the crypto-asset is determined by the issuer on a fixed-price basis. For each presale phase, the issuer sets and discloses a predetermined issue price in advance, which applies uniformly to all subscriptions accepted during the relevant phase. The offer price is not determined by market demand, auction mechanisms, or algorithmic pricing and does not vary during a presale phase.

**E.12 Total Number of Offered or Traded Other Tokens**

1000000000

**E.13 Targeted Holders**

ALL

**E.14 Holder Restrictions**

The crypto-asset is offered to the public without restriction as to investor category. No distinction is made between retail and professional investors, and no limitations are imposed based on the type of holder. Participation in the offer remains subject to applicable legal, regulatory, and jurisdictional requirements. Certain tokens are subject to vesting and lock-up schedules, and transfers may be restricted by applicable laws, sanctions regimes, platform eligibility criteria, or exchange-imposed KYC/AML requirements.

**E.15 Reimbursement Notice**

Purchasers participating in the offer to the public of crypto-asset will be able to be reimbursed if the minimum target subscription goal is not reached at the end of the offer to the public, if they exercise the right to withdrawal provided for in Article 13 of Regulation (EU) 2023/1114 of the European Parliament and of the Council or if the offer is cancelled.

**E.16 Refund Mechanism**

No refund mechanism is provided in relation to the crypto-asset once a subscription has been validly accepted and the crypto-assets have been issued. Subscriptions are final and non-revocable upon acceptance, except where a statutory right of withdrawal applies under Article 13(4) of Regulation

(EU) 2023/1114. Refunds may occur only where required under applicable mandatory law or where a subscription cannot be completed due to a verified technical failure preventing the issuance of the crypto-asset. In such cases, any refund shall be processed in accordance with applicable legal and regulatory requirements.

#### E.17 **Refund Timeline**

No refund timeline is specified, as the terms of the offer do not provide for a refund mechanism. The crypto-asset does not grant purchasers any contractual right to a refund once a subscription has been accepted and the crypto-assets have been issued. Where a refund is required under applicable mandatory law, the timing of such refund shall be determined in accordance with the relevant legal requirements.

#### E.18 **Offer Phases**

The offer is structured in three presale phases with different prices and bonus allocations. Presale Phase 1 is offered at USD 0.07 with a 20% bonus allocation (3% of total supply), Presale Phase 2 at USD 0.10 with a 10% bonus allocation (7% of total supply), and Presale Phase 3 at USD 0.15 with a 5% bonus allocation (10% of total supply). Presale dates, phases, pricing, and token allocations are indicative and subject to change. The issuer may modify the presale structure, including reducing the number of presale phases or allocating a smaller number of tokens, based on market conditions, regulatory considerations, or strategic decisions. The additional token allocations represent bonus distributions and do not alter the stated issue price per token for each phase. The effective average acquisition cost per token may be lower where bonus allocations apply. The issuer reserves the right to modify, reduce, suspend, or cancel any presale phase, including adjustments to pricing, bonus allocations, or token allocation amounts, subject to applicable law and prior disclosure where required. Any tokens that remain unsold at the conclusion of a presale phase may be permanently removed from circulation and will not be reallocated to other categories unless otherwise disclosed through an updated white paper or official communication. During the presale phases, the crypto-asset may be acquired exclusively through the issuer's designated platform ([lumi.luminarybank.com](https://lumi.luminarybank.com)), subject to applicable eligibility requirements. Following the conclusion of the presale and subject to admission to trading, the crypto-asset is intended to be made available through centralised crypto-asset trading platforms and decentralised exchanges, subject to independent listing decisions and compliance with applicable laws. Upon completion of the private presale phases, the issuer intends to conduct a public offering of the crypto-asset in compliance with applicable regulatory requirements. Peer-to-peer transfers between compatible blockchain wallets are technically possible following token distribution, subject to any vesting or contractual restrictions.

**E.19 Early Purchase Discount**

Early purchasers may benefit from lower issue prices and additional token allocations during earlier presale phases. The presale structure provides for a lower issue price and a higher additional token allocation in earlier phases, with the issue price increasing and the additional token allocation decreasing in subsequent phases.

**E.20 Time-Limited Offer**

true

**E.21 Subscription Period Beginning**

2025-12-15

**E.22 Subscription Period End**

2026-04-15

**E.23 Safeguarding Arrangements for Offered Funds or Other Tokens**

During the offer to the public, funds and crypto-assets received in connection with subscriptions are held and managed using institutional-grade custody and security arrangements, including Fireblocks for key management and custody, with additional disaster-recovery support provided by Coincover. The issuer applies technical and organisational measures designed to safeguard crypto-assets, including the use of secure wallet infrastructure, access controls, and multi-signature authorisation processes. These safeguarding arrangements are intended to reduce risks related to loss, theft, or unauthorised access to crypto-assets during the offer period and do not constitute a guarantee against loss or create any entitlement to reimbursement beyond what is required under applicable law.

**E.24 Payment Methods for Other Tokens Purchase**

The purchase price of the crypto-asset is denominated in United States dollars (USD). Where payment is accepted using other means, the amount payable is determined by reference to the applicable issue price in USD in accordance with the terms of the offer. The crypto-asset may be acquired through presale phases conducted via the issuer's platform, private agreements, and, following admission to trading, through secondary market transactions on centralised or decentralised exchanges. Payment methods may include fiat, and crypto-assets accepted by the issuer or the relevant trading venue.

**E.25 Value Transfer Methods for Reimbursement**

No specific value transfer methods for reimbursement are provided, as the terms of the offer do not establish a reimbursement or refund mechanism for purchasers of the crypto-asset. Where

reimbursement is required under applicable mandatory law, any transfer of value to purchasers would be carried out in accordance with the relevant legal requirements.

#### E.26 **Right of Withdrawal**

The offer of the crypto-asset does not grant purchasers a contractual right of withdrawal. Subscriptions are considered final and binding once accepted, and the crypto-assets are issued in accordance with the terms of the offer. Any right of withdrawal may arise only where required under Article 13(4) of Regulation (EU) 2023/1114, and shall be exercised in accordance with the conditions and timelines therein.

#### E.27 **Transfer of Purchased Other Tokens**

Purchased crypto-assets are transferred to the holders following issuance in accordance with the technical processes of the underlying distributed ledger technology on which the crypto-asset is issued. The offer documentation does not specify detailed delivery procedures, custody arrangements, or timelines for the transfer beyond the issuance of the crypto-assets to blockchain addresses designated by the purchasers in accordance with the terms of the offer.

#### E.28 **Transfer Time Schedule**

N/A

### **Other Token Services Provider Characteristics**

#### E.29 **Purchaser's Technical Requirements**

To hold the crypto-asset, purchasers are required to have access to and control over a compatible blockchain wallet capable of receiving, holding, and transferring the crypto-asset on the distributed ledger technology on which it is issued. Purchasers are responsible for ensuring that their wallet infrastructure, private key management, and related security measures are adequate to securely receive and hold the crypto-asset. The offer documentation does not specify additional technical requirements beyond those inherent to interacting with the underlying blockchain network.

#### E.30 **Other Token Service Provider (CASP) Name**

No crypto-asset service provider is designated as being in charge of the placing of the crypto-assets to the public.

#### E.31 **CASP identifier**

N/A

### E.32 **Placement Form**

N/A

## **Trading Platform Characteristics**

### E.33 **Trading Platforms Name**

As of the date of this white paper, the crypto-asset has not been admitted to trading on any trading platform. The issuer intends to seek admission to trading on selected centralised and decentralised crypto-asset trading platforms, including Kraken and Crypto.com, subject to independent listing decisions and compliance with applicable legal and regulatory requirements. No binding listing agreement has been concluded, and no assurance is given that admission to trading will occur on any specific platform.

### E.34 **Trading Platforms Market Identifier Code (MIC)**

N/A

### E.35 **Trading Platforms Access**

The purpose of this white paper is to provide information in connection with the offer to the public of the crypto-asset and the intended subsequent admission to trading of the crypto-asset on certain centralised crypto-asset trading platforms operating within the European Union, including Kraken and [Crypto.com](https://crypto.com). As of the date of this white paper, no binding listing agreements have been concluded, and admission to trading remains subject to the independent assessment, approval, and listing procedures of the respective trading platforms.

### E.36 **Involved Costs**

No specific costs related to access to trading platforms are imposed by the issuer. Any costs incurred by investors in connection with accessing or using trading platforms on which the crypto-asset may be available are determined independently by the relevant platform operators and may include transaction fees, trading fees, custody fees, or network fees. Transactions involving the crypto-asset require payment of network transaction fees in Ether (ETH), the native token of the Ethereum blockchain. Based on publicly observable network conditions over the six months preceding publication of this white paper, the average gas cost for a simple ERC-20 token transfer has been approximately USD 0.10, although actual fees vary depending on network congestion and transaction complexity. Platform-related token transfers are expected to incur similar network fees, as they rely on standard ERC-20 transfer functionality. Gas costs are determined by Ethereum network conditions and are not controlled or influenced by the issuer.

E.37 **Offer Expenses**

N/A

E.38 **Conflicts of Interest**

Any activities of third parties, including service providers or trading platform operators, are conducted independently and are not subject to the control of the issuer. To the best of the issuer's knowledge, no conflict or interest has been identified to date in relation to the admission to trading of the crypto-asset.

E.39 **Applicable Law**

British Virgin Islands

E.40 **Competent Court**

Courts of the British Virgin Islands

## **F. PART F - INFORMATION ABOUT OTHER TOKENS**

### **F.1 Crypto-Asset Type**

Utility Token

### **F.2 Other Token Functionality**

The crypto-asset is designed as a utility crypto-asset intended to enable access to selected features and services within the Luminary ecosystem. Its functionality is limited to enabling access to specified platform features and service tiers, subject to eligibility conditions and technical availability, the optional use as a means of payment for certain platform-related service fees where such functionality is technically supported, and participation in structured, non-binding community feedback and signalling mechanisms. Community feedback mechanisms may be used to gather indicative input on ecosystem-related initiatives, including community grants, charitable initiatives, or application-level parameters, and such mechanisms are consultative in nature only. Any governance-related features associated with the crypto-asset are strictly non-binding and do not confer voting rights, ownership interests, decision-making authority, or control over the issuer, its treasury, or any regulated activities. The crypto-asset does not provide holders with any entitlement to financial returns, profit participation, yield, or repayment. Any future extension of functionality, if implemented, will be subject to technical development, regulatory considerations, and updated disclosures prior to activation.

### **F.3 Planned Application of Functionalities**

The functionalities of the crypto-asset described in this white paper are planned and are not fully operational as of the date of publication. The crypto-asset is intended to enable access to selected platform features and service tiers, subject to eligibility conditions and technical availability, the optional use as a means of payment for certain platform-related service fees where such functionality is technically supported, and participation in structured, non-binding community feedback and signalling mechanisms. Such functionalities are expected to be implemented in phases following the conclusion of the presale and are subject to technical readiness, regulatory considerations, and operational implementation. Community feedback mechanisms are consultative in nature only and do not confer governance rights, ownership interests, or decision-making authority. Any future extension of functionality, if implemented, will be disclosed in accordance with applicable legal requirements prior to activation.

### **F.4 Type of crypto-asset white paper**

OTHR

**F.5 Type of submission**

NEWT

**F.6 Other Token Characteristics**

The LUMI token is a fungible crypto-asset intended to qualify as a utility token and is not intended to fall within the definitions of asset-referenced tokens or e-money tokens under Regulation (EU) 2023/1114 (MiCAR). The total maximum supply of the token is fixed at 5,000,000,000 units, and the token is issued on the Ethereum blockchain. The token represents on-chain utility value only and confers no dividend rights, redemption claims, profit-sharing rights, or equity or ownership interests in the issuer or any affiliated entity. Additional tokens may be minted progressively in accordance with predefined allocation and vesting schedules until the maximum supply cap is reached. No stabilisation mechanism, value-pegging arrangement, or redemption right applies to the crypto-asset.

**F.7 Commercial name or trading name**

Luminary Token (LUMI)

**F.8 Website of the issuer**

<https://luminarybank.com/>

**F.9 Starting date of offer to the public or admission to trading**

2026-04-06

**F.10 Publication date**

2026-04-06

**F.11 Any other services provided by the issuer**

The issuer acts as the issuer and minter of the crypto-asset and is responsible for the coordination and administration of the Luminary crypto-asset project. In addition to the issuance of the crypto-asset, the issuer provides software-based and platform-related services forming part of the Luminary ecosystem, including the development and operation of digital platform interfaces, the maintenance of smart contracts and related technical infrastructure, the coordination of non-binding community engagement and feedback mechanisms, and administrative, technical, and compliance-related support activities connected to the crypto-asset project. Where such services are offered to users in the European Union, they are subject to applicable Union and national legislation.

F.12 **Language or languages of white paper**

en

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**

C6QGXBH5J

F.14 **Functionally Fungible Group Digital Token Identifier, where available**

69KR7GFFC

F.15 **Voluntary data flag**

true

F.16 **Personal data flag**

false

F.17 **LEI eligibility**

false

F.18 **Home Member State**

IE

F.19 **Host Member States**

AT

BE

BG

HR

CY

CZ

DK

EE

FI

FR

DE

GR

HU

IT

LV

LT

LU

MT

NL

PL

PT

RO

SK

SI

ES

SE

IS

LI

NO

## **G. PART G - INFORMATION ON RIGHTS AND OBLIGATIONS ATTACHED TO THE OTHER TOKENS**

### **G.1 Purchaser Rights and Obligations**

The crypto-asset grants purchasers limited utility-based rights within the Luminary ecosystem. Once implemented, holders may use the crypto-asset to access selected platform features and service tiers, subject to technical availability, jurisdictional limitations, and applicable legal or regulatory requirements. The crypto-asset may also be used, where supported, as a utility payment token to settle selected platform-related service fees in accordance with the applicable fee schedule. Purchasers may participate in non-binding community feedback and signalling mechanisms. Such participation is advisory in nature only and does not confer governance authority, ownership rights, or decision-making power over the issuer, its treasury, or any regulated activities. No purchaser right exists to access future functionalities, and any additional utilities, if introduced, will be subject to separate disclosure, technical development, and applicable legal or regulatory requirements. Purchasers are required to comply with applicable laws and regulations and with the platform's terms of use. The crypto-asset is non-custodial, and holders bear sole responsibility for the secure management of private keys, wallets, and technical infrastructure. Purchasers are also responsible for any applicable blockchain network fees and platform fees associated with the use or transfer of the crypto-asset. Access to platform features and utilities may vary by jurisdiction, regulatory status, technical readiness, or partner availability and may be modified, restricted, or discontinued in accordance with applicable law and platform terms.

### **G.2 Exercise of Rights and Obligation**

Ownership of the crypto-asset grants holders only the rights expressly described in the documentation relating to the crypto-asset and those arising under applicable law. No additional rights are attached to the crypto-asset. Rights associated with the crypto-asset are exercised through interaction with compatible blockchain wallets and the underlying distributed ledger technology. The transfer of the crypto-asset to another blockchain address results in the transfer of control of the crypto-asset to the recipient address in accordance with the rules of the relevant blockchain network. Access to platform features and utilities linked to the crypto-asset may require wallet authentication and, where applicable, interaction with technical interfaces, and remains subject to technical availability, eligibility criteria, jurisdictional restrictions, and applicable legal or regulatory requirements. The issuer does not provide custodial services in respect of the crypto-asset and does not store, manage, or have access to holders' wallets or private keys. Holders are solely responsible for the secure management of their crypto-assets and for complying with applicable laws and the relevant terms governing use of the platform and the crypto-asset.

### G.3 **Conditions for Modifications of Rights and Obligations**

Any significant new factor, material mistake, or material inaccuracy capable of affecting the assessment of the crypto-asset shall be disclosed in a modified or supplemented version of this white paper, notified to the competent authorities, and published in accordance with Article 12 of Regulation (EU) 2023/1114. The rights, utilities, and applicable fee schedules associated with the crypto-asset may be modified, restricted, or suspended only where such changes are necessary and proportionate and occur in order to implement technical updates, smart-contract upgrades, migrations, or security measures required to maintain the security, functionality, or technical integrity of the crypto-asset or related infrastructure; to reflect changes to platform services, access conditions, or fee structures, provided such changes do not alter the fundamental nature of the crypto-asset; to ensure compliance with applicable laws, regulations, regulatory guidance, court decisions, or supervisory authority measures; or in exceptional circumstances, including critical security incidents or force majeure events, where temporary restrictions are required to protect users or the integrity of the system.

### G.4 **Future Public Offers**

Following the conclusion of the private presale, the issuer intends to conduct a public offering of the crypto-asset, subject to applicable legal and regulatory requirements. The structure, timing, and terms of any such public offering will be disclosed in accordance with Regulation (EU) 2023/1114 prior to commencement. No assurance is given that any future public offer will take place, nor that it will occur on specific terms or within a particular timeframe.

### G.5 **Issuer Retained Other Token**

0

### G.6 **Utility Token Classification**

true

### G.7 **Key Features of Goods/Services of Utility Tokens**

The crypto-asset is a utility token designed to provide access to selected digital goods and services within the Luminary ecosystem. The goods and services accessible through the crypto-asset consist of platform features, service tiers, and related digital functionalities made available through the issuer's platform. Use of the crypto-asset may enable access to certain platform features and service tiers, the settlement of selected platform-related service fees, and participation in non-binding community feedback and signalling mechanisms. The availability, scope, and quantity of goods and services accessible through the crypto-asset may vary over time and by jurisdiction and are subject to technical

availability, applicable legal and regulatory requirements, and eligibility conditions. No assurance is given that any particular good or service will be continuously available.

#### G.8 **Utility Tokens Redemption**

The crypto-asset functions as a utility and payment token within the Luminary ecosystem and is redeemed through a combination of on-chain transactions and platform-based technical processes. Redemption does not involve the exchange of the crypto-asset for fiat currency or an off-chain voucher. Holders redeem the crypto-asset by interacting with a compatible blockchain wallet and, where applicable, the issuer's platform interfaces. Redemption may be used to settle selected platform-related service fees, to access platform features or service tiers, or to obtain other utilities made available within the ecosystem. The amount of crypto-assets required for redemption is determined at the time of redemption in accordance with the applicable conditions and any relevant fees. Redemption is completed through an on-chain transfer of the required amount of crypto-assets to a designated address or smart contract. Following redemption, the corresponding good or service is made available in accordance with the applicable technical conditions, eligibility requirements, and, where relevant, the terms of third-party service providers. Any additional utilities, if introduced in the future, will be subject to separate disclosure, regulatory considerations, and technical implementation.

#### G.9 **Non-Trading Request**

false

#### G.10 **Other Tokens Purchase or Sale Modalities**

N/A

#### G.11 **Other Tokens Transfer Restrictions**

The crypto-asset is a fungible utility token implemented on a public blockchain and is, once in circulation, transferable between compatible blockchain wallets and trading venues that list the token, subject to applicable law, technical constraints, and allocation-based vesting restrictions. Transfers are executed peer-to-peer on the underlying blockchain network and are irreversible once confirmed. Transfer restrictions apply to certain token allocations as a result of vesting and lock-up arrangements. Tokens allocated to platform development services, ecosystem development, treasury, and liquidity-related purposes are subject to vesting or release schedules and are not transferable until the applicable vesting or release conditions are satisfied. Airdropped tokens may be subject to partial unlock arrangements, with transferability limited to the unlocked portion. Vesting and lock-up arrangements are enforced through contractual obligations and are not implemented as protocol-level transfer restrictions. The issuer does not require approval for peer-to-peer transfers of unlocked tokens

and does not have the ability to reverse or block transfers at the protocol level. Transfers may also be subject to restrictions imposed by applicable law or by trading venues, including compliance, onboarding, or geographic limitations. Other than the restrictions described above, no additional contractual or technical transfer restrictions apply to circulating tokens.

#### G.12 **Supply Adjustment Protocols**

false

#### G.13 **Supply Adjustment Mechanisms**

The crypto-asset does not include any protocol-based or algorithmic mechanisms to increase or decrease the total supply in response to changes in demand, market conditions, or other external variables. The total maximum supply is capped at 5,000,000,000 tokens, of which 154,285,714 tokens have been minted as of the publication date. The smart contract includes mint functionality, which remains active to enable progressive minting of tokens in accordance with predefined allocation and vesting schedules. Minting is limited strictly to the fixed maximum supply cap and is not demand-responsive or algorithmically triggered. Vesting schedules determine the timing of minting and/or release of tokens allocated to specific categories, including team, ecosystem, treasury, presale, and liquidity allocations. The issuer may, on a discretionary and non-automated basis, decide to reduce the circulating supply through voluntary token buybacks and token burns. Such actions are not governed by an on-chain demand-responsive protocol, are not linked to market price movements, and do not create any expectation, entitlement, or right for holders of the crypto-asset. Tokens not sold during the presale phases may be permanently removed from circulation and will not form part of the circulating supply, and such removal does not constitute a demand-responsive or algorithmic supply adjustment mechanism.

### **Other Token Scheme Details**

#### G.14 **Token Value Protection Schemes**

false

#### G.15 **Token Value Protection Schemes Description**

None

#### G.16 **Compensation Schemes**

false

**G.17 Compensation Schemes Description**

None

**G.18 Applicable Law**

British Virgin Islands

**G.19 Competent Court**

British Virgin Islands

## **H. PART H – INFORMATION ON UNDERLYING TECHNOLOGY**

### **H.1 Distributed Ledger Technology (DLT)**

The crypto-asset is issued, stored, and transferred using distributed ledger technology. It is implemented through smart contracts deployed on the Ethereum public blockchain, which enable on-chain transfers, balance tracking, and interaction with the crypto-asset's functionalities in a transparent and verifiable manner. Transactions involving the crypto-asset are validated by the consensus mechanism of the Ethereum blockchain network and recorded on the distributed ledger, where they can be independently verified by network participants. Smart contracts are used to support interaction between on-chain token utilities and platform features, while maintaining a separation between blockchain-based functionality and any regulated activities provided through licensed partners. All on-chain interactions are subject to the technical rules of the underlying blockchain network, including network fees, transaction finality, and network availability, and operate independently of the issuer's systems once confirmed on the distributed ledger.

### **H.2 Protocols and Technical Standards**

The crypto-asset is implemented using established protocols and technical standards within the Ethereum ecosystem. It is deployed on the Ethereum mainnet, a public and permissionless blockchain operating under a Proof-of-Stake consensus mechanism. All transactions involving the crypto-asset are recorded on Ethereum's distributed ledger and validated in accordance with the network's consensus, transaction finality, and availability rules. The crypto-asset is implemented as an ERC-20 fungible token. The ERC-20 standard defines a common interface for balance tracking, transfers, and approvals and enables interoperability with Ethereum-compatible wallets and infrastructure. The smart contract governing the crypto-asset enforces a fixed maximum supply and supports standard transfer functionality. No algorithmic rebasing, automatic minting, or demand-responsive supply mechanisms are implemented. Core token operations, including peer-to-peer transfers and on-chain payments, are executed through the ERC-20 smart contract. Other platform-related functionalities are managed off-chain through authenticated platform systems and, where applicable, licensed partners, with wallet ownership used as an eligibility signal. The crypto-asset is compatible with Ethereum-compatible wallets that support ERC-20 tokens and allow users to hold Ether for the payment of network transaction fees. No proprietary wallet software is required. As of the date of this white paper, mint authority has not been renounced, as tokens are intended to be minted progressively in accordance with predefined allocation and vesting schedules. No minting beyond the fixed maximum supply cap is technically possible. The crypto-asset is technically compatible with decentralised and centralised trading venues that support ERC-20 tokens, subject to the independent technical, legal, and compliance requirements of each venue. All on-chain interactions require payment of Ethereum

network transaction fees in Ether. Such fees are determined by prevailing network conditions and are not imposed or controlled by the issuer.

### H.3 **Technology Used**

The crypto-asset is issued on the Ethereum mainnet as a fungible ERC-20 token. The ERC-20 standard defines the interface for balance tracking, token transfers, and allowance management and enables compatibility with Ethereum-based infrastructure. The maximum supply of the crypto-asset is fixed, and no algorithmic rebasing or automatic minting mechanisms are implemented. The Luminary Token smart contract is based on a standardised token contract template provided by Bitbond. That template has previously been subject to an external security audit conducted by CertiK. No separate audit has been commissioned specifically for the Luminary Token deployment. The crypto-asset may be held and transferred using Ethereum-compatible wallets that support ERC-20 tokens. Transfers are executed through standard on-chain transactions signed by the holder's private key and settled on the Ethereum blockchain. The crypto-asset is non-custodial by default. Holders are solely responsible for the management and security of their private keys and wallets. The issuer does not provide custodial services for user-held crypto-assets and cannot recover lost or compromised tokens. For issuer-controlled token holdings used for operational purposes, the issuer relies on third-party institutional custody and key-management services. These arrangements apply exclusively to issuer-controlled assets and do not affect peer-to-peer transfers between users. All on-chain transactions require payment of Ethereum network transaction fees in Ether. Such fees are determined by network conditions and are not imposed or controlled by the issuer. Transactions are irreversible once confirmed on the blockchain. Transaction data and smart-contract state are recorded on Ethereum's distributed ledger and can be independently verified through public blockchain infrastructure. The platform integrates on-chain token functionality with off-chain systems used to manage service eligibility, membership tiers, and partner-provided features. Governance signalling and certain platform features operate off-chain, while token transfers and fee payments occur on-chain.

### H.4 **Consensus Mechanism**

Transactions involving the crypto-asset are recorded on the Ethereum public blockchain, which operates under a Proof-of-Stake consensus mechanism. Under this model, block production and transaction validation are performed by validators selected in accordance with protocol-defined criteria, including the staking of Ether. Validators propose and attest to blocks containing transactions, which are validated for correctness and compliance with the network's rules. Transaction finality is achieved through Ethereum's consensus layer once blocks are justified and finalised, reducing the likelihood of subsequent reorganisation. The consensus mechanism determines the validation, ordering, and confirmation of transactions recorded on the distributed ledger. Block production occurs

at regular intervals defined by the protocol, and network availability is maintained by a decentralised set of validators operating globally.

#### H.5 **Incentive Mechanisms and Applicable Fees**

**Incentive mechanisms:** Transactions involving the crypto-asset are secured by the consensus mechanism of the Ethereum public blockchain. Under Ethereum's Proof-of-Stake model, network validators are incentivised through rewards paid in Ether and a share of transaction fees for proposing and validating blocks. These incentive mechanisms are governed solely by the Ethereum protocol and are not linked to, or influenced by, the crypto-asset or the issuer. **Applicable fees:** All on-chain transactions involving the crypto-asset require the payment of Ethereum network transaction fees in Ether. Such fees vary depending on network conditions and transaction complexity and are not imposed or controlled by the issuer. The smart contract implementing the crypto-asset does not apply protocol-level transfer fees, minting fees, or burn fees. Certain platform-related services made available within the ecosystem may be subject to service fees determined by the platform or by licensed third-party partners. Where supported, the crypto-asset may be accepted as an optional method for settling selected service fees at the prevailing market value. Any such fees are disclosed through platform documentation or partner terms and do not affect the on-chain operation of the crypto-asset. **Fee transparency:** Ethereum network fees are publicly visible and verifiable on the blockchain. Platform-level service fees, where applicable, are disclosed through user interfaces or contractual documentation and operate independently of the underlying blockchain protocol.

#### H.6 **Use of Distributed Ledger Technology**

true

#### H.7 **DLT Functionality Description**

The crypto-asset is issued, stored, and transferred using distributed ledger technology on the Ethereum public blockchain. The distributed ledger technology is not operated by the issuer or by any third party acting on the issuer's behalf. Core on-chain functionality is implemented through an ERC-20 smart contract, which enables balance tracking and peer-to-peer transfers. Transactions are broadcast to the Ethereum network, validated by network validators in accordance with the Proof-of-Stake consensus mechanism, and recorded on the distributed ledger. On-chain transaction data can be independently verified by network participants using public blockchain infrastructure. Once transactions are confirmed and finalised, they operate independently of the issuer's systems and cannot be altered or reversed. Platform-related features that interact with the crypto-asset rely on wallet ownership and authentication as an eligibility signal only and do not affect on-chain balances or transfer logic.

**Other Token Audit Details**

H.8 **Audit**

false

H.9 **Audit Outcome**

N/A

## **I. PART I – INFORMATION ON RISKS**

### **General Risk Disclaimer**

Each user of the crypto-assets acts at their sole risk. To the fullest extent permitted by Regulation (EU) 2023/1114 and applicable mandatory law, the issuer's liability is limited as described in this white paper. Nothing herein excludes or limits liability where such exclusion or limitation is not permitted under applicable law.

### **I.1 Offer-Related Risks**

The offer to the public of the crypto-asset and any potential admission to trading involve risks that purchasers should carefully consider before acquiring the crypto-asset. The offer may be modified, suspended, or withdrawn in accordance with applicable law and the terms of the offer. There is no guarantee that the crypto-asset will be admitted to trading on any trading platform, nor that an active or liquid secondary market will develop. Even where admission to trading occurs, liquidity may be limited and subject to volatility. Market conditions following issuance may adversely affect the value, transferability, or usability of the crypto-asset. Purchasers may be unable to sell or transfer the crypto-asset at a desired time or price, or at all. Participation in the offer involves the risk of loss of all or part of the value of the crypto-assets acquired. Crypto-assets are subject to significant market, operational, and regulatory risks, and purchasers should assess their own financial situation and risk tolerance before participating in the offer.

### **I.2 Issuer-Related Risks**

The issuer is subject to a number of risks that may affect its ability to operate the platform and support the crypto-asset. Crypto-asset, payments, and financial-services regulation in the European Union and other jurisdictions continues to evolve, and if the issuer is unable to adapt its internal policies, procedures, technical systems, or third-party arrangements to comply with applicable legal and regulatory requirements, some or all utilities associated with the crypto-asset could be restricted, modified, or suspended. The issuer's operations depend on third-party infrastructure providers, including blockchain networks, custodians, payment service providers, and smart-contract systems, and disruptions, security incidents, technical failures, or integration issues affecting these providers could delay transactions, interrupt platform services, or temporarily prevent the use of the crypto-asset. The issuer's operational capacity depends on the availability of financial resources and revenues, and lower-than-expected fundraising outcomes, adverse market conditions, or higher-than-anticipated operating costs could limit development activities, delay planned initiatives, or reduce support for ecosystem growth. Until any binding on-chain governance framework is introduced, decision-making authority remains concentrated within the issuer and its designated governance bodies, which may

result in changes to policies, partnerships, or strategic priorities that differ from purchaser expectations. The issuer also relies on a limited number of key individuals for management, compliance, and technical development, and the loss or unavailability of such individuals could adversely affect operations or delay the achievement of planned objectives. As no tokens have yet been allocated or distributed internally, future operational capacity depends on the successful implementation of the token distribution model and related funding activities.

### I.3 **Other Tokens-Related Risks**

The crypto-asset is subject to risks that may adversely affect its value, transferability, and usability. The market price of the crypto-asset may fluctuate significantly due to broader crypto-asset market conditions, changes in liquidity, regulatory developments, or project-specific events, which may result in losses for holders. Secondary-market liquidity may be limited, particularly following issuance or during periods of heightened volatility, and limited trading activity may make it difficult to buy or sell the crypto-asset at desired times or prices. Control of the crypto-asset depends entirely on private cryptographic keys, and loss, theft, or compromise of private keys may result in the permanent loss of access to the crypto-asset. The issuer does not provide custodial services and cannot recover lost tokens. The crypto-asset relies on smart contracts deployed on a public blockchain, and vulnerabilities, coding errors, or technical failures could result in malfunctioning transfers, suspension of utilities, or loss of crypto-assets. Transactions involving the crypto-asset are recorded on a public blockchain, and while wallet addresses are pseudonymous, transaction data may be analysed in combination with external information to identify users or infer activity patterns. Changes in applicable laws, regulations, or tax rules may affect the classification, transferability, use, or taxation of the crypto-asset, or result in trading platforms restricting or delisting the crypto-asset, potentially adversely affecting its liquidity or value.

### I.4 **Project Implementation-Related Risks**

The implementation of the project is subject to a number of risks that may affect its timely execution and adoption. Admission to trading on specific platforms is not guaranteed and remains subject to independent listing decisions, and failure to secure admission may affect liquidity and market accessibility. The issuer cannot guarantee that the crypto-asset will be admitted to trading on any specific trading platform, and delays in admission to trading, refusals to list, or delistings by trading platforms could adversely affect liquidity, market access, and the adoption of the project. The crypto-asset relies on the Ethereum blockchain for issuance and transfers, and network congestion, outages, protocol upgrades, or consensus-related issues could delay or temporarily prevent transactions and adversely affect the implementation and operation of the project's on-chain functionalities. The planned staged implementation of platform access, governance signalling, and payment functionalities may be delayed or modified due to technical, regulatory, or operational factors, and any such delay

could affect the timing of the utility associated with the crypto-asset. The issuer retains discretion to modify, reduce, or cancel presale phases, and such modifications may affect the timing, availability, or total quantity of tokens entering circulation. The planned public offering following the presale is subject to regulatory compliance and market conditions, and delays or changes to the structure of the offering may affect token distribution timelines.

## **I.5 Technology-Related Risks**

The use of distributed ledger technology and smart contracts involves technological risks that may adversely affect the crypto-asset and its functionalities. Vulnerabilities, coding errors, or integration failures in the smart contracts supporting the crypto-asset could result in unintended behaviour, incorrect execution of transactions, temporary suspension of functionalities, or loss of crypto-assets. Although the underlying contract template has previously undergone an external audit in a separate context, no independent audit has been conducted specifically for the crypto-asset deployment, and implementation-specific risks cannot be entirely excluded. The crypto-asset relies on a public blockchain network, and network congestion, outages, forks, validator failures, or consensus-related issues may delay, fail, or prevent the confirmation of transactions. Transactions recorded on the blockchain are irreversible once confirmed, and errors such as incorrect destination addresses or unintended transfers cannot be reversed. Access to the crypto-asset depends entirely on private cryptographic keys, and loss, theft, or compromise of private keys may result in the permanent loss of access to crypto-assets. Cyber-attacks, malware, phishing attempts, wallet exploits, or security breaches affecting users or third-party technical providers may result in unauthorised access to wallets or loss of crypto-assets. Undiscovered flaws or weaknesses in the underlying blockchain protocol or related software could be exploited to disrupt transactions, affect balances, or impair network availability. The operation of the crypto-asset depends on internet connectivity and third-party technical infrastructure, and failures affecting such infrastructure may interrupt access to wallets, smart contracts, or platform-related services. As mint authority has not been renounced, additional tokens may be minted in accordance with the predefined allocation and vesting schedules until the maximum supply cap is reached, and although minting is limited to the fixed supply cap, the existence of active mint authority may create perceived or actual dilution risk until all tokens have been minted. The risks described above are not exhaustive and may occur individually or in combination.

## **I.6 Mitigation Measures**

Certain measures have been implemented that are intended to mitigate some of the technology-related risks associated with the crypto-asset, although such measures do not eliminate these risks. The crypto-asset has a fixed maximum supply of 5,000,000,000 units, and no algorithmic minting, rebasing, or automatic supply adjustment mechanisms are implemented. Tokens allocated for treasury, ecosystem development, and platform development purposes are subject to vesting and release

schedules, with only a portion unlocked at the token generation event. The crypto-asset operates on a public blockchain using smart contracts, enabling on-chain transfers and balances to be independently verified by network participants. The crypto-asset is non-custodial by default, and holders retain control of their own wallets and private keys, while the issuer does not provide custodial services for user-held crypto-assets. Blockchain-based token functionality is separated from regulated financial services, which are provided through licensed third-party partners under their own regulatory frameworks. The crypto-asset confers no ownership, profit-sharing, dividend, yield, or redemption rights. Where the issuer interacts with crypto-assets for operational purposes, it relies on institutional custody arrangements and internal control mechanisms. Users remain responsible for safeguarding their private keys, using compatible wallets and interfaces, and maintaining sufficient balances to pay applicable network transaction fees.

**J. 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 crypto-asset operates on the Ethereum public blockchain, which uses a Proof-of-Stake consensus mechanism. The principal climate-related and environmental impacts associated with the crypto-asset arise from the electricity consumption required to validate transactions and maintain the integrity of the distributed ledger at the network level. These impacts are indirect and relate to validator operations across the Ethereum network rather than to activities controlled by the issuer.

Following Ethereum's transition from Proof-of-Work to Proof-of-Stake, overall network energy consumption has significantly decreased compared to prior mining-based models. Nevertheless, validator nodes require continuous electricity supply for hardware operation, networking infrastructure, and data processing. The environmental impact of this electricity consumption depends on the energy mix used in the jurisdictions where validator infrastructure is located.

Reported Scope 1 emissions attributable to the distributed ledger technology are zero at the network level, as validator operations do not involve direct on-chain combustion or controlled emissions by the issuer. Scope 2 emissions arise from purchased electricity used by validators and are estimated based on publicly available research. The share of renewable energy within the network energy mix is estimated using third-party assessments.

Additional environmental impacts may include hardware lifecycle effects, such as manufacturing, operation, and disposal of computing equipment used by validators. These impacts are not directly measurable by the issuer and are estimated using modelling methodologies referenced in sustainability disclosures.

The issuer does not control validator infrastructure and does not operate the distributed ledger. Environmental impact estimates are derived from publicly available data and recognised third-party methodologies, and are subject to assumptions, modelling limitations, and potential variations over time.

**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**

Luminary Digital Ltd

**S.2 Relevant legal entity identifier**

N/A

**S.3 Name of the crypto-asset**

SLUMI

#### **S.4 Consensus Mechanism**

Proof-of-Stake (PoS)

#### **S.5 Incentive Mechanisms and Applicable Fees**

Transactions are secured by the Ethereum public blockchain, which operates under a Proof-of-Stake consensus mechanism. Validators are incentivised at the protocol level through rewards paid in Ether and a share of transaction fees in accordance with the Ethereum network rules. All on-chain transactions require payment of network transaction fees in Ether, which are determined by network conditions and are not imposed or controlled by the issuer. The crypto-asset's smart contract does not apply protocol-level transfer, minting, or burn fees.

#### **S.6 Beginning of the period to which the disclosure relates**

2022-09-15

#### **S.7 End of the period to which the disclosure relates**

2023-09-14

#### **Mandatory key indicator on energy consumption**

#### **S.8 Energy consumption**

2600863,27000

#### **Sources and methodologies**

#### **S.9 Energy consumption sources and Methodologies**

#### **Sources and methodologies used in relation to the information reported in field S.8**

The energy consumption reported in field S.8 is based on publicly available research conducted by the Crypto Carbon Ratings Institute (CCRI) and referenced in official Ethereum sustainability disclosures and the EU Blockchain Observatory report on Ethereum's transition to Proof-of-Stake. The estimate is derived using a bottom-up modelling methodology that calculates total network electricity consumption based on validator counts, assumed hardware specifications, and estimated average power usage per validator. Energy intensity calculations are derived by dividing total annual energy consumption by the total annual number of validated Ethereum transactions during the reporting period, using publicly accessible blockchain transaction data.

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

**Supplementary key indicators**

**S.10 Renewable energy consumption**

48%

**S.11 Energy intensity**

0,006294

**S.12 Scope 1 DLT GHG emissions – Controlled**

0,00

**S.13 Scope 2 DLT GHG emissions – Purchased**

1020,83

**S.14 GHG intensity**

0,002469

**Sources and methodologies**

**S.15 Key energy sources and methodologies**

Data supplied by [Crypto Carbon Ratings Institute \(CCRI\)](#) and referenced in official [Ethereum sustainability disclosures and the EU Blockchain Observatory](#) and the [Ethereum Merge Trend Report](#); no deviations from Commission Delegated Regulation (EU) 2025/422 Article 6 (5).

**S.16 Key GHG sources and methodologies**

The GHG figures reported in fields S.12, S.13 and S.14 are based on publicly available assessments of Ethereum’s Proof-of-Stake network, including research by the Crypto Carbon Ratings Institute (CCRI), official Ethereum sustainability disclosures, and the EU Blockchain Observatory report. Scope 2 emissions are calculated by applying a grid emission factor to the reported annual electricity consumption of the network, and GHG intensity per transaction is derived by dividing total annual emissions by the estimated annual number of validated transactions.