# CODATTA (XNY)
# White paper

## In accordance with Title II of Regulation (EU) 2023/1114 (MiCA)

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| 01 | Date of notification | 07/24/2025 |
| 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 operator of the trading platform 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 and, to the best of the knowledge of the management body, the information presented in the crypto-asset white paper is fair, clear and not misleading and the crypto-asset white paper makes no omission likely to affect its import. |

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| 04 | Statement in accordance with Article 6(5), points (a), (b), (c) 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 | False |
| 06 | Statement in accordance with Article 6(5), points (e) and (f) of Regulation (EU) 2023/1114 | The crypto-asset referred to in this white paper is not covered by the investor compensation schemes under Directive 97/9/EC of the European Parliament and of the Council. The crypto-asset referred to in this white paper is not covered by the deposit guarantee schemes under Directive 2014/49/EU of the European Parliament and of the Council. |

SUMMARY

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| 07 | Warning in accordance with Article 6(7), second subparagraph of Regulation (EU) 2023/1114 | **Warning**<br>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 admission to trading 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 (36) or any other offer document pursuant to Union or national law. |
| 08 | Characteristics of the crypto-asset | Codatta is a decentralized protocol and data infrastructure empowering users to securely transform their knowledge into digital assets, unlocking continuous AI royalties.<br>Codatta serves as a decentralized data infrastructure platform that transforms raw data into tokenized assets, enabling AI developers to access and utilize high-quality datasets. Powered by the XnY Network, Codatta facilitates the assetification of data, allowing contributors to earn royalties based on the usage of their data assets.<br>Key features include:<br>• Data Assetification: Converting raw data into tradable digital assets with clear ownership and usage rights.<br>• Collaborative Data Curation: Engaging a network of human experts and AI agents to source, verify, and annotate data, ensuring quality and relevance.<br>• Incentivized Participation: Implementing a royalty-based model that rewards data contributors over time as their data is utilized in AI applications.<br>• Through this infrastructure, Codatta aims to support the development of specialized AI models by providing access to diverse and reliable datasets. |

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| 09 | Information about the quality and quantity of goods or services to which the utility tokens give access and restrictions on the transferability | N/A |

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| 10 | Key information about the offer to the public or admission to trading | XNY is a digital asset that is widely traded on global markets. As such, there is no centralized entity conducting an offer to the public. Kraken does not issue or control the supply of XNY but may facilitate its trading and custody in compliance with MiCA regulations. This whitepaper is a voluntary disclosure to enhance transparency regarding XNY's listing<br>and trading on Kraken's platform. This document does not represent a new issuance, public offering, or token sale but instead provides essential information about its admission to trading on the Kraken platform. |

**Part I – Information on risks**

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| I.1 | Offer-Related Risks | General Risk Factors Associated with Crypto-Asset Offerings<br>The admission to trading of crypto-assets, including XNY, is subject to general risks inherent to the broader cryptocurrency market.<br><br>Market Volatility:<br>The value of XNY may experience substantial fluctuations driven by investor sentiment, macroeconomic developments, and market conditions.<br><br>Regulatory Risks:<br>Changes in legislation, applicable laws, compliance requirements or the implementation of new regulatory frameworks could affect the availability, trading, or use of such assets.<br><br>Liquidity Risks:<br>The ability to buy or sell the asset without significantly affecting its price can result in losses or the inability to exit a position when needed, especially during periods of market stress or low trading volume.<br><br>Technology Risks:<br>The potential for losses or disruptions caused by failures related to the hardware and software in the underlying protocol the token is issued on.<br><br>Security Risks:<br>The risk of exploitation, hacking or security vulnerabilities of the underlying protocol and or contracts of the token leading to a loss.<br><br>Reputational Risks:<br>The potential for damage to an organization's credibility or public trust, which can negatively impact stakeholder confidence and overall business viability. |
| I.2 | Issuer-Related Risks | Financial Stability Risk:<br>The financial condition of the issuer, including challenges in cash flow or profitability, may influence the project's ability to meet its objectives. If financial difficulties arise, they could impact the operations or sustainability of the issuer.<br><br>Dependence on Key Personnel: |

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| | | The project's success is heavily dependent on the expertise and efforts of its core team. Codatta was co-founded by a small group of individuals. The loss of key team members or any breakdown in the team's functioning (for instance, due to internal governance issues or disputes) could slow down or jeopardize the project's progress and, by extension, diminish the utility and community trust in XNY.<br><br>Competition and Business Environment:<br>Codatta operates in the blockchain sector, which<br>is competitive and rapidly evolving. Competing platforms or new technologies could reduce Codatta's market share or render its tools less unique. If Codatta fails to continue innovating or to respond to competitive pressures, user adoption of its platform (and demand for XNY) may not grow as projected, posing a risk to the token's utility value.<br><br>Legal and Regulatory Risks:<br>Codatta must comply with applicable laws and regulations (including those beyond crypto-specific laws, such as data protection and financial regulations). Any legal challenges, regulatory investigations, or compliance failures involving<br>the company could disrupt operations or tarnish its reputation.<br><br>Internal Control and Governance Risks:<br>The effectiveness of the issuer's internal controls and operational processes may impact the overall management of the project. Weaknesses in controls, governance and operations could impact the project's ability to meet its goals. |
| I.3 | Crypto-Assets-related Risks | Market Volatility:<br>The crypto-asset market is subject to significant price volatility, which may affect the value of XNY. Prices can fluctuate rapidly and unpredictably due to various factors, including market sentiment, economic indicators, technological developments, regulatory news, and macroeconomic trends. This high level of volatility may lead to sudden gains or losses and can impact the liquidity and tradability of the crypto-asset.<br><br>Liquidity:<br>Liquidity refers to the ability to buy or sell a crypto-asset without causing significant price impact. XNY may experience periods of low liquidity, meaning that it could be difficult to enter or exit positions at desired prices or volumes. Reduced liquidity may result from limited market participation, exchange restrictions, or broader market conditions. This can lead to increased price volatility, slippage, and difficulty in executing transactions.<br><br>Cybersecurity & Technology Risks:<br>Risks arising from vulnerabilities in the blockchain technology used by the project or platforms. Example risks include smart contract exploits, compromise of platforms, forking scenarios, compromise of cryptographic algorithms.<br><br>Adoption Risks:<br>The risk associated with the project not achieving its goals leading to lower than expected adoption and use within the ecosystem, the impact leading to a reduced utility and value proposition.<br><br>Custody & Ownership Risk: |

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| | | The risk related to the inadequate safekeeping and control of crypto-assets e.g. loss of private keys, custodian insolvency leading to a loss.<br><br>Concentration of Holdings:<br>Related to liquidity, there is a risk that XNY's ownership is concentrated among a small number of holders (such as early investors, the team, or strategic partners). According to the token distribution plan, the Codatta team and related entities retain a sizable share of tokens (subject to lock-ups) and a venture round provided ~0.5% of the supply to investors. While these tokens are locked initially, when they unlock, if one of these large holders decides to sell a substantial quantity, it could significantly depress the market price of XNY. Conversely, the influence of large holders could lead to coordinated behavior that might not align with smaller holders' interests. |
| I.4 | Project Implementation-Related Risks | Development Delays or Shortfalls:<br>Codatta has planned several features and milestones (e.g., expansion of analytics features, integration of new blockchains). There is a risk that some of these planned developments could be delayed, scaled back, or not achieved as intended. Such delays or failures in delivering core features would directly impact the usefulness of XNY, since the token's utility is tied to these features. If advanced capabilities are not implemented on schedule or at quality, user adoption and confidence in the project could decline.<br><br>Adoption and Network Effect Risks:<br>The value of XNY's utility is correlated with the Codatta platform's user base and community participation. There is a risk that the platform may not attract or retain a large active user community.<br><br>Reliance on Third-Party Technology:<br>Codatta relies on certain third-party technologies and integrations. If any critical external technology encounters problems – the implementation of Codatta's services could be disrupted. This could prevent users from accessing features or moving their XNY between chains, damaging the token's utility and the project's reputation.<br><br>Scaling and Infrastructure:<br>As usage grows, Codatta will need to scale its infrastructure. If the team fails to scale the technology appropriately, users might face poor performance or downtime. Any significant technical outages or data inaccuracies on the platform can erode user trust.<br><br>Regulatory Compliance:<br>As the project progresses, it may encounter regulatory challenges that impact its design, implementation, or operation. Evolving legal and compliance requirements could necessitate changes to the project's architecture, user interface, or overall business model, potentially resulting in development delays, increased costs, or the need to rework key components. |
| I.5 | Technology-Related Risks | Smart contract risks:<br>XNY uses smart contracts to facilitate automated transactions and processes. While these contracts enhance efficiency and decentralization, they also introduce specific technical risks. Vulnerabilities such as coding errors, design flaws, or security loopholes within the smart contract code may be exploited by malicious actors. Such exploits could result in the loss of assets, unauthorized access to sensitive information, or unintended and irreversible execution of transactions. |

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| | | Blockchain Network Risks:<br>XNY operates on a public blockchain infrastructure, which is maintained by a decentralized network of participants. The functionality and reliability of the crypto-asset are dependent on the performance and security of the underlying blockchain. Risks may include network congestion, high transaction fees, delayed processing times, or, in extreme cases, outages and disruptions. Additionally, vulnerabilities or failures in the consensus mechanism, attacks on the network (e.g., 51% attacks), or protocol-level bugs could impact the operation and availability of XNY.<br><br>Risk of Cryptographic Advances:<br>XNY's security (like that of most blockchain tokens) depends on standard cryptographic algorithms. Advances in computing, such as the development of quantum computers, could in the future render these cryptographic techniques less secure. While this is a long-term and industry-wide risk; it is worth noting that if encryption standards were broken or significantly weakened, the security of all blockchain assets, including XNY, would be at risk. This could potentially allow bad actors to forge signatures or otherwise manipulate the blockchain.<br>Privacy:<br>Transactions involving XNY are recorded on a public blockchain, where transaction data is transparent and permanently accessible. While public addresses do not directly reveal personal identities, transaction histories can be analyzed and, in some cases, linked to individuals through data aggregation or external information sources. This transparency may pose privacy concerns for users seeking confidentiality in their financial activity. Participants should be aware that transaction data on public blockchains is not inherently private and could be subject to scrutiny by third parties, including regulators, analytics firms, or malicious actors. |
| I.6 | Mitigation measures | Reliance on Secure Infrastructure:<br>Codatta chose mature blockchain networks (ETH and BNB Chain). Chains have large communities and ongoing security improvements. While this does not guarantee safety, it means the foundational infrastructure is maintained by experienced entities and is subject to scrutiny from the wider blockchain community. It must be stressed that, despite these mitigation efforts, risks remain. The measures above reduce the likelihood or impact of certain events but cannot remove risk entirely from XNY or the Codatta project. Token holders and users should remain prudent and aware of the residual risks described in this white paper. |

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

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|---|---|---|
| A.1 | Name | XNY Foundation |
| A.2 | Legal form | 3G60 |
| A.3 | Registered address | 71 Fort Street, PO Box 500, George Town, Grand Cayman, KY1-1106, Cayman Islands |
| A.4 | Head office | N/A |

<table>
<tr><td>A.5</td><td>Registration Date</td><td>2025-4-23</td></tr>
<tr><td>A.6</td><td>Legal entity identifier</td><td>N/A</td></tr>
<tr><td>A.7</td><td>Another identifier required pursuant to applicable national law</td><td>AY-420854</td></tr>
<tr><td>A.8</td><td>Contact telephone number</td><td>+1 4126419638</td></tr>
<tr><td>A.9</td><td>E-mail address</td><td>listing@inductive.network</td></tr>
<tr><td>A.10</td><td>Response Time (Days)</td><td>5 days per week</td></tr>
<tr><td>A.11</td><td>Parent Company</td><td>N/A</td></tr>
<tr><td>A.12</td><td>Members of the Management body</td><td>
<table>
<tr><th>Full Name</th><th>Business Address</th><th>Function</th></tr>
<tr><td>Yi Zhang</td><td>681 Briar Haven DR, Castle Pines CO 80108-5505 United States</td><td>Director</td></tr>
<tr><td>Appleby Global Services (Cayman) Limited</td><td>71 Fort Street PO Box 500 George Town Grand Cayman KY1-1106 Cayman Islands</td><td>Secretary</td></tr>
</table>
</td></tr>
<tr><td>A.13</td><td>Business Activity</td><td>Codatta operates a decentralized AI infrastructure platform that transforms raw data into tokenized assets, specializing in verticals like crypto account annotation and robotics. By processing and labeling 570 million data units into auditable, AI-ready datasets, it enables developers to access high-quality training resources while ensuring data provenance through blockchain technology. The platform demonstrates strong traction with 330K total users, 20K daily active addresses, and 120K monthly active users, validating its role as a critical data layer for ethical AI development.</td></tr>
<tr><td>A.14</td><td>Parent Company Business Activity</td><td>N/A</td></tr>
</table>

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|---|---|---|
| A.15 | Newly Established | True |
| A.16 | Financial condition for the past three years | Over the past three years, Codatta has strategically invested in growth, building a solid foundation reflected in its treasury reserve. It achieved steady revenue growth and maintain a healthy runway – significantly above industry benchmarks for startups. Its disciplined investment in talent and infrastructure positions it for scalable growth. Current operations are effectively funded through mid-2027, providing ample time to accelerate its revenue trajectory through existing growth initiatives and explore strategic financial partnerships. |
| A.17 | Financial condition since registration | N/A |

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

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| B.1 | Issuer different from offeror or person seeking admission to trading | True |
| B.2 | Name | XnY Labs Limited |
| B.3 | Legal form | 2550 |
| B.4 | Registered address | Sea Meadow House, P.O. Box 116, Road Town, Tortola, British Virgin Islands |
| B.5 | Head office | N/A |
| B.6 | Registration Date | 2025-5-8 |
| B.7 | Legal entity identifier | N/A |
| B.8 | Another identifier required pursuant to applicable national law | 2176231 |
| B.9 | Parent Company | XnY Foundation |
| B.10 | Members of the Management body | **Full Name** / **Business Address** / **Function** |

| | | |
|---|---|---|
| | | <table><tr><td>Yi Zhang</td><td>681 Briar Haven DR, Castle Pines CO 80108-5505 United States</td><td>Director</td></tr></table> |
| B.11 | Business Activity | It specializes in the issuance and management of its native token, which underpins the platform's ecosystem. This entity designs the token's economic model, executes its distribution through private and public sales, and ensures regulatory compliance. The token facilitates transactions within Codatta's core platform—enabling developers to purchase tokenized AI datasets and rewarding data contributors—while also serving governance functions to decentralize platform evolution. |
| B.12 | Parent Company Business Activity | Codatta operates a decentralized AI infrastructure platform that transforms raw data into tokenized assets, specializing in verticals like crypto account annotation and robotics. By processing and labeling 570 million data units into auditable, AI-ready datasets, it enables developers to access high-quality training resources while ensuring data provenance through blockchain technology. The platform demonstrates strong traction with 330K total users, 20K daily active addresses, and 120K monthly active users, validating its role as a critical data layer for ethical AI development. |

**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 of the operator of the trading platform | N/A |
| C.7 | Another identifier required pursuant to applicable national law | N/A |
| C.8 | Parent Company | N/A |

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| 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 |

Part D- Information about the crypto-asset project

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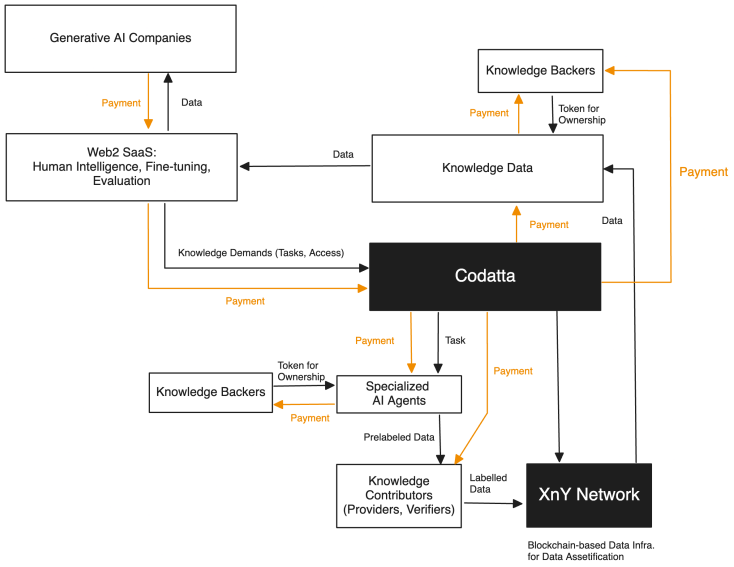
| D.1 | Crypto-asset project name | Codatta |
| D.2 | Crypto-assets name | XNY Token (XNY) |
| D.3 | Abbreviation | XNY |
| D.4 | Crypto-asset project description | Codatta is a decentralized protocol and data infrastructure empowering users to securely transform their knowledge into digital assets, unlocking continuous AI royalties. |




D.5

Details of all natural or legal persons involved in the implementation of the crypto-asset project

| Name | Role | Education | Experience |
|---|---|---|---|
| Yi Zhang (Linkedin, X: @drtwo101) | CEO & Founder | PhD @ Univ. of Cincinnati (USA)<br><br>BS@UESTC (China) | Senior Engineering Manager @ Alipay;<br><br>Data Scientist @ Pinterest (USA) |
| Kevin Wang<br><br>(linkedin) | CPO & Co-founder | MS@CMU (USA) | Director @ Alibaba Strategy Investment;<br><br>Head of Oversea Product @ Ant Group (International);<br><br>Senior Product Manager & Software Engineer @ Oracle (USA) |
| Paul Pang (linkedin) | CTO & Co-founder | MS@China Academy<br><br>BS@Northeast Univ. | CTO @ VipKids; Software Engineer @ Douban |
| Jason Cheng | VP of Engineering & Co-founder | MS@Shanghai Jiaotong Univ.<br><br>BS@Shangdong Univ. | 8+ years in Web3 & AI, active contributor and mentor across BTC, ETH, Polkadot, Avalanche, Near, Flow, AWS |
| Chenyan Xiong (linkedin) | Chief Scientist (Part-time) | PhD@CMU | Associate Professor @ CMU (now),<br><br>Staff Engineer @ Microsoft |

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| D.6 | Utility Token Classification | False |
| D.7 | Key Features of Goods/Services for Utility Token Projects | N/A |
| D.8 | Plans for the token | Initiated in 2023 through the Microscope Protocol and partners like Coinbase, this community-driven data pipeline labeled 300M+ crypto addresses and powers real-time risk data sharing via the Crypto Defenders Alliance, achieving 560M+ annotations across 95 categories. By 2024, it scaled to 300K+ global contributors who transformed crowd intelligence into real-world applications, generating 5M+ submissions and validating 2M+ entries across 100+ domains and 200+ countries. The project advances toward protocol decentralization in 2025 with on-chain commitments and privacy-first infrastructure, storing multi-chain data (Ethereum, Avalanche, BNBchain) for verifiability and composability. Looking to 2026, it aims to transcend data assetification through royalty-based payments, enabling contributors to earn as their knowledge powers AI applications while teams pay proportionally to usage growth. |
| D.9 | Resource Allocation | N/A |
| D.10 | Planned Use of Collected Funds or Crypto-Assets | N/A |

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

| | | |
|---|---|---|
| E.1 | Public Offering or Admission to trading | ATTR |
| E.2 | Reasons for Public Offer or Admission to trading | Making secondary trading available to the consumers on the Kraken Trading platform in compliance with the MiCA regulatory framework. |
| E.3 | Fundraising Target | N/A |
| E.4 | Minimum Subscription Goals | N/A |
| E.5 | Maximum Subscription Goal | N/A |
| E.6 | Oversubscription Acceptance | N/A |
| E.7 | Oversubscription Allocation | N/A |

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| E.8 | Issue Price | N/A |
| E.9 | Official currency or other crypto-assets determining the issue price | N/A |
| E.10 | Subscription fee | N/A |
| E.11 | Offer Price Determination Method | N/A |
| E.12 | Total Number of Offered/Traded crypto-assets | 10,000,000,000 maximum supply |
| E.13 | Targeted Holders | ALL |
| E.14 | Holder restrictions | N/A |
| E.15 | Reimbursement Notice | N/A |
| E.16 | Refund Mechanism | N/A |
| E.17 | Refund Timeline | N/A |
| E.18 | Offer Phases | N/A |
| E.19 | Early Purchase Discount | N/A |
| E.20 | Time-limited offer | N/A |
| E.21 | Subscription period beginning | N/A |
| E.22 | Subscription period end | N/A |

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| E.23 | Safeguarding Arrangements for Offered Funds/crypto-assets | N/A |
| E.24 | Payment Methods for crypto-asset Purchase | N/A |
| E.25 | Value Transfer Methods for Reimbursement | N/A |
| E.26 | Right of Withdrawal | N/A |
| E.27 | Transfer of Purchased crypto-assets | N/A |
| E.28 | Transfer Time Schedule | N/A |
| E.29 | Purchaser's Technical Requirements | N/A |
| E.30 | Crypto-asset service provider (CASP) name | N/A |
| E.31 | CASP identifier | N/A |
| E.32 | Placement form | NTAV |
| E.33 | Trading Platforms name | Kraken |
| E.34 | Trading Platforms Market Identifier Code (MIC) | PGSL |
| E.35 | Trading Platforms Access | N/A |
| E.36 | Involved costs | N/A |

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| E.37 | Offer Expenses | N/A |
| E.38 | Conflicts of Interest | All listings decisions made by Payward Global Solution Ltd are made independently by staff of the entity in line with internal policies. PGSL publishes a conflicts of interest disclosure on its website advising of potential conflicts that may arise. |
| E.39 | Applicable law | Any dispute relating to this white paper shall be governed by and construed and enforced in accordance with the laws of Ireland without regard to conflict of law rules or principles (whether of Ireland or any other jurisdiction) that would cause the application of the laws of any other jurisdiction, irrespective of whether XNY tokens qualify as right or property under the applicable law. |
| E.40 | Competent court | Any disputes or claims arising out of this white paper will be subject to the exclusive jurisdiction of the Irish courts. |

Part F - Information about the crypto-assets

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| F.1 | Crypto-Asset Type | XNY is classified as a crypto-asset other than an asset referenced token or e-money token under MiCA, (EU) 2023/1114. |
| F.2 | Crypto-Asset Functionality | XNY is a decentralized digital asset. XNY does not qualify as a utility token under Article 3(5) of MiCA, as it does not grant access to goods or services provided by the issuer or a third party. Instead, XNY functions primarily as a settlement asset. It does not confer consumption-based rights or access features required to meet the utility token definition. |
| F.3 | Planned Application of Functionalities | Data Access & Trading: XNY is required to purchase and trade tokenized data assets on the platform.<br>Staking & Governance: Staking XNY allows users to validate data quality, earn royalties, and participate in protocol governance.<br>Incentive Rewards: Data contributors and curators receive XNY as royalties for their contributions.<br>Cross-chain Interoperability: XNY facilitates cross-chain data transactions and integration with DeFi protocols. |
| F.4 | Type of white paper | OTHR |
| F.5 | The type of submission | NEWT |
| F.6 | Crypto-Asset Characteristics | XNY functions as a multi-utility token within its ecosystem: it serves as the mandatory currency for purchasing and trading tokenized data assets, enables staking for data validation, royalty generation, and governance participation, rewards contributors and curators with royalties, and powers cross-chain data interoperability with DeFi protocols. This integrated design positions XNY as both an access key and value-accrual engine — driving platform activity, securing network integrity, incentivizing high-quality data contributions, and bridging decentralized data markets across blockchain networks. |
| F.7 | Commercial name or trading name | XNY |

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| F.8 | Website of the issuer | https://codatta.io/ |
| F.9 | Starting date of offer to the public or admission to trading | 2025-7-23 |
| F.10 | Publication date | 2025-8-13 |
| F.11 | Any other services provided by the issuer | N/A |
| F.12 | Identifier of operator of the trading platform | PGSL |
| F.13 | Language or languages of the white paper | English |
| F.14 | Digital Token Identifier | N/A |
| F.15 | Functionally Fungible Group Digital Token Identifier | N/A |
| F.16 | Voluntary data flag | True |
| F.17 | Personal data flag | True |
| F.18 | LEI eligibility | N/A |
| F.19 | Home Member State | Ireland |
| F.20 | Host Member States | Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, Iceland, Liechtenstein, Norway |

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

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| G.1 | Purchaser Rights and Obligations | Rights of XNY Holders:<br>Holders of XNY are entitled to utilize the token within the Codatta ecosystem as described. Specifically, a purchaser of XNY has the right to: Acquire permanent, transferable ownership of tokenized data assets; Access and trade data assets on the platform using XNY; Stake XNY to vote on protocol upgrades, fee structures, and data validation rules; Earn royalties from licensed usage of purchased data assets; Use XNY for seamless data transactions across integrated blockchains.<br><br>Obligations of XNY Holders:<br>There are no mandatory obligations imposed on XNY purchasers beyond the general terms of use of the platform.<br><br>Transferability and Trading:<br>Holders have the ability to transfer their XNY tokens to others (on-chain) or to trade them on available markets at will. Ownership of XNY carries with it the aforementioned access rights, and when a token is transferred, those rights pass to the new holder. The previous holder loses access once they no longer hold the token. |
| G.2 | Exercise of Rights and obligations | Since XNY is a decentralized digital asset with no central issuer, there are no contractual rights or obligations to exercise. Users control their XNY holdings by managing their private keys and can transact freely within the network, subject to transaction fees and network confirmation times. Compliance with applicable laws and regulations remains the sole responsibility of the user. |
| G.3 | Conditions for modifications of rights and obligations | XNY's rights and obligations are determined by network consensus and cannot be unilaterally modified by any single entity. However, legal and regulatory obligations affecting XNY and its use may change depending on jurisdiction, and users are responsible for ensuring compliance with relevant laws. |
| G.4 | Future Public Offers | N/A |
| G.5 | Issuer Retained Crypto-Assets | 20% |
| G.6 | Utility Token Classification | False |
| G.7 | Key Features of Goods/Services of Utility Tokens | N/A |
| G.8 | Utility Tokens Redemption | N/A |
| G.9 | Non-Trading request | False |

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| G.10 | Crypto-Assets purchase or sale modalities | N/A |
| G.11 | Crypto-Assets Transfer Restrictions | There are no restrictions imposed by the issuer or offeror on the transferability of XNY tokens. However, trading platforms and crypto-asset service providers may impose restrictions on buyers or sellers in accordance with applicable laws, such as anti-money laundering (AML), counter-terrorist financing (CTF), sanctions regulations, or internal compliance policies and user agreements. |
| G.12 | Supply Adjustment Protocols | False |
| G.13 | Supply Adjustment Mechanisms | N/A |
| G.14 | Token Value Protection Schemes | False |
| G.15 | Token Value Protection Schemes Description | N/A |
| G.16 | Compensation Schemes | False |
| G.17 | Compensation Schemes Description | N/A |
| G.18 | Applicable law | Any dispute relating to this white paper shall be governed by and construed and enforced in accordance with the laws of Ireland without regard to conflict of law rules or principles (whether of Ireland or any other jurisdiction) that would cause the application of the laws of any other jurisdiction, irrespective of whether XNY tokens qualify as right or property under the applicable law. |
| G.19 | Competent court | Any disputes or claims arising out of this white paper will be subject to the exclusive jurisdiction of the Irish courts. |

Part H – information on the underlying technology

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| H.1 | Distributed ledger technology | N/A |
| H.2 | Protocols and technical standards | General blockchain technology: As a fundamental underpinning, the XNY Network relies on blockchain technology for immutable contribution records, transparent data lineage, and decentralized operations.<br>Privacy-preserving mechanisms(e.g. zero-knowledge proofs): To protect sensitive information while maintaining verifiability.<br>DID-based identity and credential systems: comprehensive identity layer is implemented through DID-based credential and reputation systems, enabling verifiable credentials and portable reputation scores across the ecosystem. |

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| | | Decentralized storage (e.g. IPFS): The network coordinates with decentralized storage solutions for storing actual data, while recording metadata immutably on-chain.<br>GDPR requirements: Regulatory compliance, specifically mentioning GDPR requirements, through carefully designed permission systems |
| H.3 | Technology Used | Staking mechanism: This is a form of holding crypto-assets that directly contributes to the network's security and trust.<br>On-chain operations: XNY serves as the mandatory payment method for all on-chain operations (data contributions, verification processes, ownership transfers) via gas fees.<br>Data access and ownership transfers with XNY: purchase full or partial ownership rights to datasets or access permission-gated data,This directly relates to the transfer of crypto-assets for value exchange.<br>Integration with frontier tokens. |
| H.4 | Consensus Mechanism | Transaction gas fees(Applicable Fees): The XNY token serves as the mandatory payment method for all on-chain operations. The collected fees compensate network participants (validators) who validate and process transactions, creating a sustainable economic loop. Fees can be dynamically adjusted based on the complexity of data verification workflows; more resource-intensive verifications command proportionally higher costs.<br>Staking mechanism (Incentive & Security): Participants are required to lock up a certain amount of XNY tokens as collateral. Stakers earn passive income through interest payments distributed from network transaction fees, proportional to their commitment.<br>Bounty hunting (Incentive & Security): Participants are economically incentivized to identify problems within the network. Users can earn significant XNY rewards by identifying fraudulent or erroneous submissions. When users successfully challenge incorrect data, they receive compensation for their vigilance, often a portion of the slashed tokens from the offending party's stake.<br>Royalty-based reward system: Mechanism for distributing compensation to contributors based on actual usage of their data in AI systems. |
| H.5 | Incentive Mechanisms and Applicable Fees | N/A |
| H.6 | Use of Distributed Ledger Technology | 1. XNY as the native token based on the blockchain protocol, its issuance is inherently managed by the underlying DLT's rules and is not centrally controlled by an issuer or offeror in a traditional sense. Tokens are also "earned" through data contributions, bounty hunting, and staking rewards。As a token issued on other blockchain platforms(e.g., smart contracts), XNY has an issuer, but the total circulating supply is fixed.<br>2. Transaction Gas Fees: XNY serves as the mandatory payment method for all on-chain operations. These gas fees are processed on-chain, which is how transfers occur on a DLT.<br>3. Data Access and Ownership Transfers: Users "purchase full or partial ownership rights to datasets" and "access permission-gated data resources" using XNY tokens. "Licensing fees for knowledge assets are denominated in XNY, allowing for frictionless transactions across different knowledge domains". All these are DLT-based transfers of value.<br>4. Contributor Rewards: Contributors receive XNY tokens for their valuable knowledge contributions, and these rewards are also transferred via the DLT. |

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| | | 5. On-chain Records: While actual large data may be stored in hybrid storage systems combining decentralized and centralized storage, the metadata of contributions (samples, labels, verifications) is recorded immutably on-chain.<br>6.Staking Mechanism: The robust staking mechanism requires participants to lock up a certain amount of cryptocurrency as collateral. This locking up is a form of DLT-based storage where tokens are held in smart contracts for a specific purpose.<br>7.Operator: The XNY Network operates as a decentralized protocol. It is not operated by a single issuer, offeror, or a third-party acting solely on their behalf in a centralized manner. Instead: The protocol governed by smart contracts and community governance. |
| H.7 | DLT Functionality Description | 1. Multi-Blockchain Abstraction and Orchestration Layer: The XNY it functions as an abstraction and orchestration layer across multiple blockchain ecosystems. It interoperates with and coordinates resources from various underlying DLTs.<br>2. Smart contracts: It self-executing code stored and run on a DLT. They automatically enforce agreements and business logic, e.g., access controls, royalty distributions, without the need for a central intermediary.<br>3. Staking Mechanism: validators must stake substantial tokens to participate in network consensus as orchestration nodes, ensuring they have economic incentives aligned with honest validation. And the slashing mechanism is governed by transparent rules and multi-party validation to prevent abuse further reinforcing decentralized governance and security.<br>4. DID-based reputation system: It's built upon the DLT, enabling verifiable credentials and portable reputation scores that are not controlled by the issuer.<br>Governance Participation: XNY holders gain voting rights proportional to their holdings, allowing them to shape the future of the platform. This is a decentralized governance model where control over the DLT's evolution resides with the community of token holders. |
| H.8 | Audit | True |
| H.9 | Audit outcome | Medium risk |

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

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| J.1 | Adverse impacts on climate and other environment-related adverse impacts | Energy consumption: 0.038 kWh/a<br>Energy consumption sources and methodologies: The energy consumption of the XNY token is determined through a multi-network allocation methodology. First, the total energy consumption of the underlying blockchain network(s) is calculated. The token's proportional energy footprint is then derived from its gas consumption relative to the network's total transactional activity during the measurement period. The final consumption value represents the aggregated energy impact across all network instances where the token operates. |