

BLOCKBEN

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I.01: Date of notification		
2025-12-04		
I.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 and person seeking admission to trading of the crypto-asset is solely responsible for the content of this crypto-asset white paper.		
I.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.		
I.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.'		
I.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.]		
I.06: Statement in accordance with Article 6(5), points (e) and (f) of Regulation (EU) 2023/1114		
The crypto-asset referred to in this white paper is not covered by the investor compensation schemes under Directive 97/9/EC of the European Parliament and of the Council or the deposit guarantee schemes under Directive 2014/49/EU of the European Parliament and of the Council.		

Summary	
I.07: Warning in accordance with Article 6(7), second subparagraph of Regulation (EU) 2023/1114	Warning This summary should be read as an introduction to the crypto- asset white paper. The prospective holder should base any decision to purchase this crypto-asset on the content of the crypto- asset white paper as a whole and not on the summary alone. The offer to the public of this crypto-asset does not constitute an offer or solicitation to purchase financial instruments and any such offer or solicitation can be made only by means of a prospectus or other offer documents pursuant to the applicable national law. This crypto-asset white paper does not constitute a prospectus as referred to in Regulation (EU) 2017/1129 of the European Parliament and of the Council or any other offer document pursuant to Union or national law.
I.08: Characteristics of the crypto-asset	BlockStock (BSO/eBSO) is a utility token issued by BlockBen, functioning as the core utility token within the BlockBen ecosystem. BSO is natively hosted on the proprietary BlockBen blockchain infrastructure, while eBSO, its Ethereum-based equivalent, is issued as an ERC-20 token to support interoperability with external platforms. Rights and Obligations of the Holder: Holders of BSO/eBSO are entitled to allocations derived from transaction fees within the BlockBen ecosystem. These allocations are credited into a common gold pool. The value accumulated in this gold pool is distributed equally across all circulating BSO/eBSO tokens, thereby offering indirect exposure to a gold-backed reserve. Exercise of Rights: The allocation from the gold pool is realized automatically through the platform's internal accounting mechanisms. The rights are passive in nature - users are not required to take any action to receive their share, and distribution is proportional based on token holdings. Modifiability of Rights: The terms governing the rights and obligations of BSO/eBSO holders may be subject to change in accordance with the General Terms and Conditions of BlockBen, which are publicly available and incorporated by reference into the token offering. Modifications may occur under specific conditions, including: • Regulatory compliance: Updates required to align with changes in applicable laws, such as MiCAR, GDPR, or national financial legislation; • Technical or functional changes: Adjustments necessary to support upgrades, platform improvements, or interoperability (e.g. cross-chain deployments or new features); • Security enhancements: Revisions made to improve the protection of token holders, data, or system integrity; • Material changes: If modifications materially affect user rights, BlockBen will provide prior notice (minimum 14 calendar days) via the platform and/or direct communication channels, and may offer a right of withdrawal where required under applicable law. Key Features: • Use Case: Facilitates participation in the BlockBen ecosystem and entitles holders to a pro-rata allocation

	from a gold pool funded by transaction fees. • Gold Pool Mechanism: A unique mechanism where transaction fees are pooled into a reserve denominated in gold. The pool is distributed equally across the circulating token supply. • Access to Services: BSO/eBSO holders may access: ○ Exclusive promotional campaigns and early product launches, ○ Cross-chain functionality, such as planned access to interoperability tools via Binance Smart Chain (BSC). • Transferability: BSO is transferable within the proprietary BlockBen platform. eBSO may be transferred externally using Ethereum-compatible wallets and exchanges. • Technology: BSO operates on BlockBen's hybrid blockchain (Natrix), while eBSO uses Ethereum's ERC-20 standard.
I.09: Key information about the admission to trading	The public offering of BSO was completed in 2021 by BlockBen Financial Services OÜ, an Estonian-registered entity. The tokens were issued directly to users via the BlockBen platform and allocated in accordance with the terms and conditions applicable at the time. As of the date of this white paper, the token sale has ended and no further tokens are being issued by BlockBen. Currently, BSO and its Ethereum-based equivalent, eBSO, are accessible exclusively through secondary market transactions. These include: • Peer-to-peer transfers within the proprietary BlockBen Wallet, • Transfers and trades via Lbank trading platform that list eBSO. Admission to Trading: eBSO is currently admitted to trading on the LBank centralized exchange, a global crypto-asset trading platform. BlockBen does not control or operate this platform and does not guarantee continuous availability or trading conditions. In addition, BlockBen is exploring the possibility of listing eBSO on one or more crypto-asset trading platforms that are expected to operate in compliance with MiCAR. These potential listings would be pursued with the goal of improving market liquidity and enhancing accessibility for token holders. However, no definitive commitment has been made, and any such admission to trading remains subject to future business decisions and third-party platform's acceptance.

Part A - Information about the offeror or the person seeking admission to trading			
A.1: Name	BlockBen UAB		
A.2: Legal form	Limited Liability Company (UAB); ELF Code: ES2D		
A.3: Registered address	Lvivo g. 25-702, LT-09320 Vilnius, Lithuania		
A.4: Head office	Lvivo g. 25-702, LT-09320 Vilnius, Lithuania		
A.5: Registration Date	2023-06-08		
A.6: Legal entity identifier	N/A		
A.7: Another identifier required pursuant to applicable national law	Registration number: 306333139 (Commercial Register)		
A.8: Contact telephone number	+370 602 99431		
A.9: E-mail address	compliance@blockben.com		
A.10: Response Time (Days)	(1) one working day		
A.11: Parent Company	N/A		
A.12: Members of the Management body	Name	Position/Function	Business Address

	<table><tr><td>Béla Farkas</td><td>Chairman of the Management Body</td><td>Lvivo g. 25-702, LT-09320 Vilnius, Lithuania</td></tr><tr><td>Dr István Nagy</td><td>Member of the Management Body; AML/CFT responsibility</td><td>Lvivo g. 25-702, LT-09320 Vilnius, Lithuania</td></tr></table>	Béla Farkas	Chairman of the Management Body	Lvivo g. 25-702, LT-09320 Vilnius, Lithuania	Dr István Nagy	Member of the Management Body; AML/CFT responsibility	Lvivo g. 25-702, LT-09320 Vilnius, Lithuania
Béla Farkas	Chairman of the Management Body	Lvivo g. 25-702, LT-09320 Vilnius, Lithuania					
Dr István Nagy	Member of the Management Body; AML/CFT responsibility	Lvivo g. 25-702, LT-09320 Vilnius, Lithuania					
A.13: Business Activity	BlockBen UAB is currently operating as a Virtual Asset Service Provider (VASP) under Lithuanian law, providing services including the issuance and operation of crypto-assets within a controlled ecosystem. The company serves both individual clients and corporate partners developing virtual assets, ensuring full compliance with AML/CFT regulations. This VASP status is valid until 31 December 2025. While the company will remain legally active throughout 2026, it will cease all crypto-related activities at the end of 2025, transferring these operations to a newly established entity in Latvia, which will be authorised under the EU Markets in Crypto-Assets Regulation (MiCAR).						
A.14: Parent Company Business Activity	N/A There is no parent company of BlockBen UAB.						
A.15: Newly Established	TRUE						
A.16: Financial condition for the past three years	N/A As BlockBen UAB was established in 2023, there is no historical financial data available for the past three years.						
A.17: Financial condition since registration	Since its registration, BlockBen UAB has maintained a stable financial condition, primarily driven by continuous revenue from crypto-related transactions conducted on its proprietary platform. In addition to servicing individual clients, the company has partnered with third-party entities to co-develop and issue virtual assets, generating fixed revenue streams through these collaborative token projects. This business model has ensured consistent cash flow and financial self-sufficiency without reliance on external funding.						

Part A - Information about the issuer, if different from the offeror or person seeking admission to trading				
A.1: Name	BlockBen SIA			
A.2: Legal form	Limited Liability Company (SIA); ELF Code: ES2D			
A.3: Registered address	Krišjāņa Valdemāra iela 21-11, Rīga, LV-1010, Latvia			
A.4: Head office	Krišjāņa Valdemāra iela 21-11, Rīga, LV-1010, Latvia			
A.5: Registration Date	2025-05-20			
A.6: Legal entity identifier	254900BBV7FA7LUG5913			
A.7: Another identifier required pursuant to applicable national law	Registration number: 50203650041 (Commercial Register)			
A.8: Contact telephone number	+37129900506			
A.9: E-mail address	compliance@blockben.com			
A.10: Response Time (Days)	(1) one working day			
A.11: Parent Company	N/A			
A.12: Members of the Management body	Name	Position/Function	Business Address	
	Viktor Mark Bodnar	Chairman of the Management Body	Krišjāņa Valdemāra iela 21-11, Rīga, LV-1010 (LV-RIX)	
	Attila Krocsek	Member of the Management Body	Krišjāņa Valdemāra iela 21-11, Rīga, LV-1010 (LV-RIX)	
	Luize Berzina	Member of the Management Body; AML/CFT responsibility	Krišjāņa Valdemāra iela 21-11, Rīga, LV-1010 (LV-RIX)	
A.13: Business Activity	BlockBen SIA is a Latvia-based entity primarily focused on delivering business-to-business (B2B) digital asset services. Its core activity is to support third-party clients in the issuance, administration, and lifecycle management of their crypto-assets within a secure, compliant infrastructure aligned with Regulation (EU) 2023/1114 (MiCAR).			

	BlockBen operates a proprietary digital wallet and hybrid blockchain infrastructure (Natrix), designed to host, manage, and facilitate internal transfers of both third-party tokens and BlockBen's own crypto-assets, such as utility and asset-linked tokens issued on the platform. The BlockBen Wallet functions as a closed, permissioned environment. It is not interoperable with public or open blockchains and does not support external token custody. This architecture ensures enhanced regulatory compliance, robust transaction control, and strict adherence to AML/CFT obligations. In addition, BlockBen SIA facilitates fiat-to-crypto conversion services, enabled through partnerships with licensed EU financial institutions. All platform services are provided under comprehensive legal and compliance oversight, ensuring conformity with applicable financial and data protection frameworks.
A.14: Parent Company Business Activity	N/A There is no parent company of BlockBen SIA.
A.15: Newly Established	TRUE
A.16: Financial condition for the past three years	N/A As BlockBen SIA was recently established, there is no historical financial data available for the past three years.
A.17: Financial condition since registration	As of the date of this white paper, no annual financial statements have been filed or audited. As the entity is still in the early phase of setup, financial performance to date has been limited to initial capitalization and the incurrence of pre-operational expenses related to the MiCAR licensing process, legal advisory, and organizational setup. These activities have been funded by the shareholders and internal group resources. Although no historical financial information is available at this stage, BlockBen SIA will follow robust financial reporting practices from inception, including the preparation of audited financial statements in accordance with IFRS. Upon commencement of operations, BlockBen SIA will report regularly on financial and non-financial key performance indicators (KPIs), including but not limited to: client onboarding volumes, transaction volumes, token issuance data, compliance metrics, and liquidity coverage.

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

N/A

Part D - Information about the crypto-asset project

D.1: Crypto-asset project name	BlockStock
D.2: Crypto-assets name	BlockStock
D.3: Abbreviation	BSO or eBSO
D.4: Crypto-asset project description	BlockStock (BSO) and its Ethereum-based counterpart eBSO function as utility tokens within the hybrid blockchain ecosystem developed by BlockBen. The tokens are designed to support and incentivize participation in the platform's core operations. BSO/eBSO serve multiple purposes within the ecosystem: • They are used to facilitate the validation of transactions executed on the proprietary BlockBen blockchain (Natrix), where BlockBen, as the platform operator, receives remuneration from activity on the network. • A portion of the value generated through platform usage is credited to a gold pool, which is then distributed proportionally among all BSO/eBSO holders. • Holders may also gain access to exclusive features, product offerings, or promotional campaigns as determined periodically by the platform. The token is not intended to confer ownership rights or profit-sharing entitlements and should not be viewed as an investment instrument. All

	functionalities are restricted to the BlockBen ecosystem and subject to the platform's terms and policies.
D.5: Details of all natural or legal persons involved in the implementation of the crypto-asset project	Blockben Financial Services OÜ is responsible for the implementation of the crypto-asset project. The business address is Harju tn. 6., 10130 Tallinn, Estonia. BlockBen Financial Services OÜ is a former issuer of the tokens, the status of the issuer was assigned to BlockBen UAB (Lvivo g. 25-702, LT-09320 Vilnius, Lithuania), and then to BlockBen SIA. Thus, BlockBen SIA is currently the issuer of BlockStock as of the date of this whitepaper.
D.6: Utility Token Classification	TRUE
D.7: Key Features of Goods/Services for Utility Token Projects	Indirect benefit from platform activity: a portion of transaction fees generated within the BlockBen ecosystem is allocated to a gold pool, which is then distributed equally across holders of all circulating BSO/eBSO tokens. This allocation is managed within the platform's rules and does not confer ownership or profit-sharing rights.
D.8: Plans for the token	The following milestones are planned to enhance accessibility, interoperability, and market visibility: Cross-Chain Deployment: BSO, initially issued on the Ethereum network (as eBSO), will be extended to the Binance Smart Chain (BSC). This will improve transaction efficiency, reduce gas fees, and broaden participation across multiple blockchain environments. Token Bridge Integration: A secure, compliant cross-chain bridge will be implemented to enable seamless interoperability between Ethereum and BSC versions of BSO, ensuring consistency of supply and utility. BlockBen is exploring the possibility of listing eBSO on one or more crypto-asset trading platforms that are expected to operate in compliance with MiCAR. These potential listings would be pursued with the goal of improving market liquidity and enhancing accessibility for token holders. However, no definitive commitment has been made, and any such admission to trading remains subject to future business decisions and third-party platform acceptance.
D.9: Resource Allocation	Financial Resources: BlockBen allocates dedicated financial resources to support the ongoing management and operation of BSO. This includes funding for maintaining the proprietary blockchain infrastructure (Matrix), gold pool accounting, compliance with MiCAR obligations, and the integration of eBSO on external networks such as Ethereum. Human Resources: A specialized team is responsible for the lifecycle of BSO/eBSO, including IT developers, compliance professionals, AML/CTF officers, product managers, and operational staff. These team members ensure the secure, compliant, and effective functioning of the token within the ecosystem. Technological Resources: BlockStock is natively hosted on the BlockBen platform and mirrored as eBSO on the Ethereum blockchain. The company invests in maintaining high availability, secure transaction execution, and technical interoperability. The infrastructure is aligned with both MiCAR and DORA requirements for ICT risk management and operational resilience. Operational Resilience: To ensure uninterrupted access and continuity of BSO/eBSO services, BlockBen maintains a comprehensive cybersecurity and business continuity framework. This includes multi-layered security protocols, system monitoring, and contingency planning for critical systems. Platform Development & Innovation: Ongoing development efforts are focused on expanding the BlockBen

	platform's functionality, enhancing token usability, and refining internal processes such as transaction routing, gold pool distribution, and compliance monitoring. Third-Party Services: BlockBen engages trusted third-party service providers for transaction analytics, wallet screening (e.g. Crystal, SumSub), and legal/regulatory advisory to support MiCAR and AML/CFT compliance obligations across the token lifecycle.
D.10: Planned Use of Collected Funds or Crypto- Assets	N/A, because BlockBen SIA plans to seek admission to trading and engage solely in marketing activities for promoting BSO and eBSO, without newly issuing.

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

E.1: Public Offering or Admission to trading	OTPC – offer to the public, ATTR – admission to trading
E.2: Reasons for Public Offer and Admission to trading	The public offering of eBSO (Ethereum-based BlockStock) is conducted through direct communication campaigns initiated by BlockBen, informing and encouraging users to acquire the token via selected crypto-asset trading platforms (please note that Lbank is currently the only crypto-asset trading platform on which eBSO can traded). These communications are intended to promote public access to eBSO under a MiCAR-compliant framework and ensure transparency and informed decision-making by prospective purchasers. The offer is designed to: • Facilitate broader access to the BlockBen ecosystem and its gold-linked value mechanisms, • Enable users to acquire eBSO in an open market environment using their preferred trading infrastructure, • Support compliant public participation in the utility token's value model. In parallel, the admission to trading of eBSO supports: • Liquidity and discoverability of the token in regulated or widely used crypto marketplaces, • Interoperability with ERC-20-compatible wallets and platforms, • Greater user autonomy outside the closed BlockBen infrastructure, • Increased ecosystem visibility and potential integration by third parties. This combined strategy ensures both accessibility for the general public and the long-term scalability of the eBSO token.
E.3: Fundraising Target	N/A
E.4: Minimum Subscription Goals	N/A
E.5: Maximum Subscription Goals	N/A
E.6: Oversubscription Acceptance	FALSE
E.7: Oversubscription Allocation	N/A
E.8: Issue Price	N/A, because BlockBen SIA does not plan to newly issue BSO/eBSO.
E.9: Official currency or any other crypto- assets determining the issue price	N/A
E.10: Subscription fee	N/A
E.11: Offer Price Determination Method	N/A
E.12: Total Number of Offered/Traded Crypto- Assets	750.000.000 (as maximum supply of the BlockStock).
E.13: Targeted Holders	RETI
E.14: Holder restrictions	The acquisition, holding, and use of BlockStock (BSO) and its Ethereum-based version (eBSO) are subject to the following eligibility and compliance restrictions. These apply differently depending on whether the token is accessed within the BlockBen Wallet or acquired

	via external platforms, such as LBank. 1. Age and Legal Eligibility • Within the BlockBen Wallet, holders must be at least 18 years of age and possess full legal capacity. Individuals classified as Restricted Persons—including those subject to international sanctions or acting on behalf of such entities—are barred from participation. • For eBSO acquired on external trading platforms, eligibility criteria are determined and enforced by those platforms. BlockBen does not assume responsibility for verifying age or legal status in such cases. 2. KYC and AML Requirements • Users transacting BSO via the BlockBen Wallet must complete full identity verification (KYC) and are screened against global sanctions lists in accordance with BlockBen's AML/CFT framework. • BlockBen does not conduct or oversee KYC procedures for users acquiring eBSO through third-party exchanges. These platforms are independently responsible for implementing their own AML compliance measures. 3. Geographic and Regulatory Restrictions • Access to BSO within the BlockBen Wallet is restricted in jurisdictions deemed prohibited or high-risk under BlockBen's internal AML policy, aligned with EU regulations and FATF guidance. • BlockBen imposes no geographic restrictions on eBSO holdings beyond its platform. However, it emphasizes that users are solely responsible for compliance with local laws in their jurisdiction. No liability is assumed for violations of foreign legal or regulatory frameworks. 4. Use-Based Restrictions • The use of BSO/eBSO within the BlockBen ecosystem is prohibited for any unlawful purpose, including but not limited to: ○ Money laundering or terrorist financing, ○ Illegal gambling, ○ Fraud, extortion, or ransomware-related activity. • For tokens acquired or used outside the BlockBen infrastructure, such as on the Ethereum network, compliance obligations rest with the user and the third-party platform facilitating the transaction.
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	N/A
E.17: Refund Timeline	N/A
E.18: Offer Phases	N/A The public offering of BlockStock (BSO) was conducted in a single phase by BlockBen Financial Services OÜ between 2018 and 2021. There were no distinct sale phases, such as private sales, pre-sales, or tiered discounts, following the initial offering. No additional issuance phases are planned. The Ethereum-based version (eBSO) reflects the already issued BSO for interoperability purposes and does not constitute a separate token offering.
E.19: Early Purchase Discount	N/A
E.20: Time-limited offer	N/A

E.21: Subscription period beginning	N/A
E.22: Subscription period end	N/A
E.23: Safeguarding Arrangements for Offered Funds/Crypto-Assets	N/A BlockBen SIA does not plan to newly issue BSO/eBSO. In particular, eBSO will be only traded on third-party crypto-asset trading platforms , which independently manage the reception and custody of user funds in accordance with their regulatory frameworks and platform-specific safeguards. Consequently, the safeguarding of funds of purchaser participating in secondary markets of eBSO is governed entirely by the terms and operational practices of the relevant trading platforms. Should BlockBen conduct direct token sales in the future, appropriate safeguarding measures - such as the use of segregated accounts, external custodians, or escrow mechanisms - will be implemented and disclosed in accordance with applicable MiCAR requirements.
E.24: Payment Methods for Crypto-Asset Purchase	N/A
E.25: Value Transfer Methods for Reimbursement	N/A
E.26: Right of Withdrawal	No right of withdrawal applies to the purchase of BlockStock (BSO/eBSO). Token purchases are final and non-refundable.
E.27: Transfer of Purchased Crypto-Assets	N/A
E.28: Transfer Time Schedule	N/A
E.29: Purchaser's Technical Requirements	To acquire and use BSO within the BlockBen ecosystem, purchasers must: • Register and maintain an account on the BlockBen Wallet platform (accessible via web browser). BlockBen Wallet is a secure digital wallet that enables users to hold, manage, and transact with digital assets within the BlockBen ecosystem. It supports tokenized assets like BSO and provides a controlled environment for internal transactions and asset storage, • Complete identity verification (KYC), • Have access to a stable internet connection and a device (PC or mobile) that supports a modern web browser (Chrome, Firefox, Safari), • Accept the General Terms and Conditions of the platform. To manage eBSO (the ERC-20 version of BSO) outside the BlockBen environment, purchasers must comply with the technical requirements specific to the crypto-asset trading platforms on which it is admitted to trading, which may include the following: • An Ethereum-compatible wallet (e.g., MetaMask, Ledger, Trust Wallet), • Access to the Ethereum network with sufficient ETH to pay for gas fees, • Familiarity with private key or seed phrase management to securely control their assets. Purchasers are responsible for safeguarding their login credentials or private keys, as applicable to the wallet used.
E.30: Crypto-asset service provider (CASP) name	N/A
E.31: CASP identifier	N/A
E.32: Placement form	N/A
E.33: Trading Platforms name	The list of the trading platforms is available on www.blockben.com and will be updated immediately upon acceptance by new trading platforms.
E.34: Trading Platforms Market Identifier Code (MIC)	N/A
E.35: Trading Platforms Access	Trading platforms are usually accessible via their respective website or applications for mobile devices.

	Purchasers are responsible for complying with any platform-specific terms, geographic restrictions, and applicable local laws.
E.36: Involved costs	Exchange Fees (eBSO): If trading eBSO on external platforms (e.g., LBank), users may be subject to exchange-defined trading or withdrawal fees, which are independent of BlockBen.
E.37: Offer Expenses	N/A
E.38: Conflicts of Interest	The listing of eBSO on external trading platforms will be initiated by BlockBen SIA, including payment of listing fees. However, market pricing and trading behaviour on these platforms are entirely independent and not influenced by BlockBen SIA. Therefore, BlockBen SIA is not aware of any potential conflict of interest among its management body members or any other persons within the BlockBen SIA and other affiliates with respect to the admission of eBSO to trading on trading platforms.
E.39: Applicable law	This whitepaper, and all legal relationships between the issuer and purchasers of the crypto-asset described herein, are governed by the laws of the Republic of Latvia, without prejudice to the mandatory provisions of applicable EU law, including Regulation (EU) 2023/1114 (MiCAR).
E.40: Competent court	Courts of Republic of Latvia

Part F - Information about the crypto-assets	
F.1: Crypto-Asset Type	Utility token
F.2: Crypto-Asset Functionality	BlockStock (BSO) is a utility token designed for use within the BlockBen ecosystem. Its primary function is to serve as a participation mechanism in the platform's economic activity. Holders of BSO are entitled to receive a proportional allocation from the BlockBen gold pool, which is funded by transaction fees generated within the ecosystem. This allocation is passive and managed through internal accounting. BSO can be used to access exclusive features, promotions, and services within the BlockBen platform. It can also be converted into eBSO, an ERC-20 representation of BlockStock on the Ethereum network, enabling interoperability and external wallet compatibility. eBSO retains the same functional attributes and gold pool linkage as BSO, and can be transferred on the Ethereum blockchain, subject to standard network fees. Neither BSO nor eBSO confer ownership rights, voting rights, or profit-sharing beyond the gold pool allocation model..
F.3: Planned Application of Functionalities	BlockBen SIA is committed to the ongoing development and expansion of the BlockStock ecosystem, ensuring continued compliance with MiCAR while enhancing its technical capabilities and market reach. The following applications of the BSO/eBSO functionalities are planned: • Cross-Chain Deployment: In addition to the existing Ethereum-based eBSO, BlockBen will extend BSO to the Binance Smart Chain (BSC). This cross-chain presence will improve transaction efficiency, reduce user costs (e.g., gas fees), and expand utility across multiple blockchain environments. • Token Bridge Integration: A secure and compliant cross-chain bridge will be introduced to allow seamless conversion between Ethereum and BSC versions of BSO. This will ensure supply consistency and uninterrupted utility, regardless of the network used.
A description of the characteristics of the crypto-asset, including the data necessary for classification of the crypto-asset white paper in the register referred to in Article 109 of Regulation (EU) 2023/1114, as specified in accordance with paragraph 8 of that Article	
F.4: Type of white paper	OTHR
F.5: The type of submission	NEWT

F.6: Crypto-Asset Characteristics	BlockStock (BSO) is utility token that functions as the native token of the BlockBen ecosystem. It is used to access ecosystem-specific features and to participate in usage-based gold pool allocation mechanism. The token was originally issued on the proprietary BlockBen blockchain and is mirrored as eBSO on the Ethereum network (ERC-20 standard) to enhance interoperability and accessibility. Holders of BSO/eBSO are entitled to receive proportional allocations from a gold-backed value pool, funded by transaction activity within the ecosystem. These allocations are distributed based on circulating supply, without conferring ownership of the underlying gold. BSO/eBSO tokens are non-redeemable, non-refundable, and not linked to any right of ownership, voting, or income. Transfers of BSO within the BlockBen Wallet are free, while conversions to eBSO incur a transaction fee. The token may be transferred freely on Ethereum or exchanged on third-party trading platforms that support it.
F.7: Commercial name or trading name	BlockBen SIA
F.8: Website of the issuer	www.blockben.com
F.9: Starting date of offer to the public and admission to trading	2026-01-10
F.10: Publication date	2026-01-08
F.11: Any other services provided by the issuer	N/A
F.12: Identifier of operator of the trading platform	N/A
F.13: Language or languages of the white paper	English
F.14: 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	N/A
F.15: Functionally Fungible Group Digital Token Identifier, where available	N/A
F.16: Voluntary data flag	FALSE
F.17: Personal data flag	FALSE
F.18: LEI eligibility	TRUE
F.19: Home Member State	Latvia
F.20: Host Member States	The admission to trading and the public offer of eBSO will be sought in the following jurisdictions beyond its Home Member State (Latvia): European Union (EU) Member States: • Austria • Belgium • Bulgaria • Croatia • Cyprus • Czech Republic • Denmark • Estonia • Finland • France • Germany • Greece • Hungary • Ireland • Italy • Lithuania • Luxembourg • Malta • Netherlands • Poland • Portugal • Romania

	• Slovakia • Slovenia • Spain • Sweden European Economic Area (EEA) States: • Iceland • Norway • Lichtenstein
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Part G - Information on the rights and obligations attached to the crypto- assets

G.1: Purchaser Rights and Obligations	Purchasers of BlockStock (BSO/eBSO) acquire a utility token that grants access to specific features and services within the BlockBen ecosystem. The primary right associated with BSO/eBSO is participation in the gold pool allocation mechanism, which distributes value derived from transaction fees among all circulating tokens on a pro-rata basis. Rights: • Access to the BlockBen platform's services and features, including ecosystem promotions and engagement campaigns. • Eligibility to receive proportional allocations from the gold pool, as managed by BlockBen's internal accounting system. • Freedom to transfer BSO within the platform or eBSO on the Ethereum blockchain, subject to applicable terms. Limitations: • BSO/eBSO do not grant ownership rights, voting rights, dividend entitlements, or any legally enforceable claim against the issuer or its affiliated companies. • There is no right to redemption, reimbursement, or refund from the issuer or its affiliated companies. • Market value may fluctuate, and token holders assume the full risk associated with holding and using the token. Obligations: As of the date of this white paper, the initial public offering of BSO has concluded and the token is no longer available for purchase directly from BlockBen. All current holdings of BSO/eBSO result from secondary market transactions or prior allocations. Holders of BSO within the BlockBen Wallet must: • Comply with BlockBen's Terms of Service, including full KYC/AML verification, • Use the token in accordance with applicable laws and platform rules, including prohibitions on illicit use (e.g., money laundering, fraud), • Acknowledge that access to internal features (e.g., participation in the gold pool) requires verified wallet linkage. Holders of eBSO on the Ethereum network interact with the token independently of BlockBen. BlockBen does not impose or enforce obligations on eBSO holders outside of its platform environment. Any obligations arising from the acquisition or use of eBSO on external platforms (e.g., trading, custody, wallet interaction) are governed solely by the respective third-party service providers.
G.2: Exercise of Rights and obligations	Holders of BlockStock (BSO) may exercise their rights by accessing the BlockBen Wallet platform, where all BSO-related functionalities are available. This includes: • Access to the gold pool allocation, which is calculated and distributed automatically via the internal accounting system — no action is required from the holder. • Participation in platform features, such as exclusive

	promotions or service access, which are managed through the user's BlockBen Wallet account. For eBSO, holders must use Ethereum-compatible wallets to manage transfers and interact with supported services. Conversion between BSO and eBSO requires a verified BlockBen Wallet account and is initiated through the platform interface. To exercise any rights, users must: • Complete and maintain KYC verification as required by BlockBen's AML/CFT policies, • Use supported wallets and interfaces, • Abide by the platform's General Terms and Conditions.
G.3: Conditions for modifications of rights and obligations	BlockBen SIA reserves the right to modify the rights and obligations associated with BSO/eBSO under the following conditions: • Regulatory Changes: Modifications may be required to comply with updates to applicable laws, supervisory guidance, or regulatory frameworks, including Regulation (EU) 2023/1114 (MiCAR), GDPR, or national laws of Latvia or other relevant jurisdictions. • Platform or Token Functionality Updates: Changes related to token usage, conversion mechanisms, or platform access may be introduced as part of ongoing technical upgrades or ecosystem development, provided such changes do not materially diminish the rights of existing token holders. • Notification Requirement: Any material modification to rights or obligations will be: ○ Published on the official BlockBen website; ○ Communicated to users via email and/or through the BlockBen Wallet interface; ○ Announced at least 14 calendar days in advance, unless earlier implementation is required for urgent legal or security compliance.
G.4: Future Public Offers	N/A
G.5: Issuer Retained Crypto-Assets	1.100.000
G.6: Utility Token Classification	TRUE
G.7: Key Features of Goods/Services of Utility Tokens	BSO/eBSO serves as a utility token within the BlockBen ecosystem, providing the following key features to holders: • Gold Pool Participation: BSO/eBSO holders are entitled to a proportional allocation of a gold-backed value pool. This pool is funded by transaction activity on the platform and allocated based on the total circulating supply of tokens. • Access to Platform Services and Promotions: BSO holders may be entitled to access to exclusive services, platform features, loyalty programs, or promotional campaigns offered within the BlockBen Wallet. • Cross-Network Utility: Through its ERC-20 representation (eBSO), the token enables interoperability with external Ethereum-based applications, wallets, and platforms. Future cross-chain expansion to Binance Smart Chain (BSC) is planned, maintaining utility across supported networks.
G.8: Utility Tokens Redemption	The core utility of BSO/eBSO lies in its participation in the BlockBen gold pool mechanism. This mechanism allocates a portion of transaction fees generated within the ecosystem to a value pool denominated in gold. The total value of the pool is automatically and proportionally distributed across all circulating BSO/eBSO tokens. No action is required by holders; participation occurs passively by simply holding the token in a supported wallet, such as the BlockBen Wallet. This process does not involve redemption in the traditional sense (i.e., conversion to fiat or goods), nor does it consume the token. Instead, it functions as a value-aligned allocation model, rewarding

	holders based on ecosystem activity. In addition to the gold pool, BSO/eBSO holders may occasionally benefit from exclusive promotional campaigns within the BlockBen platform. For example: • Holders have been invited to participate in feedback surveys or strategic input sessions, such as consultations on fee structure changes, • Selected users may receive limited reward distributions based on activity or engagement levels within the platform. These promotions are discretionary and are communicated directly through the BlockBen Wallet interface or other official channels
G.9: Non-Trading request	TRUE
G.10: Crypto-Assets purchase or sale modalities	N/A
G.11: Crypto-Assets Transfer Restrictions	Transfers of BSO within the BlockBen platform are limited to verified users who have completed KYC procedures, in accordance with AML/CFT obligations and platform rules. The Ethereum-based eBSO token is freely transferable on the Ethereum blockchain without platform restrictions. Note that the trading platforms in accordance with applicable laws and internal policies and terms may impose restrictions to purchasers and sellers of eBSO on the trading platforms themselves.
G.12: Supply Adjustment Protocol	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	The initial public offering of BSO, conducted between 2018 and 2021, was governed by the laws of the Republic of Estonia, under the responsibility of BlockBen Financial Services OÜ, a company incorporated and registered in Estonia. All contractual relationships arising from this offering were subject to Estonian law. As of the date of the white paper, ongoing operations of the BlockBen ecosystem and support for the use of BSO/eBSO are managed by BlockBen SIA (in the process of obtaining a CASP license under MiCAR in Latvia).
G.19: Competent court	Courts of Republic of Latvia

Part H - information on the underlying technology	
H.1: Distributed ledger technology	Natrix is a hybrid, consortium-style distributed ledger ("not open, not closed") specifically designed for regulated environments. It encrypts data on the blockchain but retains certain centralized controls (e.g., freezing of accounts) to meet supervisory requirements. Each financial institution deploys its own blockchain, ensuring data never leaves the institution; only zero-knowledge proofs (ZK proofs) may be shared with other institutions over the Natrix network or external blockchains. Ethereum (Public Blockchain – for eBSO): eBSO is the Ethereum-based representation of BSO and is implemented as a standard ERC-20 token. It operates on the public, permissionless Ethereum blockchain, which uses the Proof of Stake (PoS) consensus mechanism. This enables full compatibility with decentralized wallets, dApps, and exchanges. In addition, the project may use Layer 1 scaling solutions to improve transaction efficiency and reduce gas fees. These solutions inherit Ethereum's consensus layer while introducing additional throughput optimizations.
H.2: Protocols and technical standards	Natrix uses a microservice architecture and the following main

	cryptographic standards: • Elliptic curves: BLS12-381 (for distributed key generation) and secp256k1 • Encryption & hashing: ECIES, AES, HMAC, SHA, bcrypt, scrypt • Consensus: proof of identity and zero knowledge proof based proofs • Programming: TypeScript-based SDK for smart-contract-like functionality • R&D: Under development to replace cryptographic primitives in our existing protocols with post quantum safe solutions using ML-KEM and ML-DSA eBSO tokens are deployed via a smart contract on the Ethereum mainnet, which governs token issuance, balances, transfers, and allowance mechanisms. The token adheres strictly to ERC-20 conventions, ensuring compatibility with major wallet providers (e.g., MetaMask, Ledger, Trust Wallet) and DeFi infrastructure. The Ethereum network operates under a Proof of Stake (PoS) consensus mechanism, following the Ethereum Merge. This allows eBSO to benefit from Ethereum's security and decentralization model, while maintaining low environmental impact relative to Proof of Work networks. All eBSO contract operations are publicly verifiable via Ethereum block explorers such as Etherscan.
H.3: Technology Used	The Natrix platform is a hybrid, blockchain-based system designed specifically for the secure handling, storage, and transfer of digital assets (including crypto-assets) in regulated environments. Key aspects include: Client-Side Key Generation and Distributed Key Storage • User devices generate private keys that never leave the device; thus, transactions require explicit authorization from the user. • System (central) keys are cryptographically linked to user keys, allowing the service provider to freeze or suspend accounts if required by regulators (but not to conduct transactions unilaterally). • Shared key generation (e.g., BLS12-381-based NPVDKGRS) enables M-of-N multi-signature schemes (e.g., multi-owner accounts). Data Storage and Encryption • Data on the blockchain is encrypted by default (e.g., via ECIES, AES, HMAC, SHA), preventing unauthorized access to stored information. • The platform manages cryptographic keys using a segmented approach (key fragments), reinforcing data security. • A World State Machine (WSM) cache holds the most recent data values, so users can access up-to-date information without traversing the entire blockchain. Smart-Contract-Like Features (Smart Contract Runtime) • Natrix provides a TypeScript-based execution environment that runs business logic via microservices. • Developers define custom "smart" functionality, which is stored on the blockchain and executed in a sandbox environment within the platform. • The platform's extended consensus algorithm validates each of these functionalities before they are committed. Secure, Reliable Transaction Handling • Transactions rely on a two-phase commit approach combined with an extended RAFT-style consensus, preventing data corruption and ensuring that asset

	transfers occur in a controlled, lawful way. - Each transaction carries a digital signature and zero-knowledge proof that are stored on-chain, making post-hoc tampering virtually impossible. Compliance with Regulatory and Audit Requirements - The platform supports dedicated Audit Ledgers or Authority Nodes, which allow auditors or regulators to verify data in encrypted form while confirming its authenticity. - Where regulations mandate suspension or restriction of accounts (e.g., a court order or supervisory request), the Natrix architecture allows for temporary or forever freezes without exposing private keys. By integrating these cryptographic and architectural features, Natrix provides robust security and flexibility for issuing, storing, and transferring crypto-assets, while supporting the central control functions and oversight requirements that regulated financial and payment environments demand. The Ethereum-based version of BlockStock (eBSO) is built on the Ethereum Layer 1 public blockchain, a decentralized, permissionless network that supports the execution of smart contracts via the Ethereum Virtual Machine (EVM). eBSO is implemented using the ERC-20 token standard, which defines a fixed interface for token management, including functionalities such as balance tracking, token transfers, and allowance delegation. The token's smart contract is deployed and operates directly on the Ethereum mainnet.
H.4: Consensus Mechanism	The consensus mechanism is primarily based on proof of identity and zero-knowledge proofs (ZK proofs), ensuring that verified proof data is replicated across the ledger nodes. This configuration enables two-phase commit and anti-monopolize measures, preventing any single node from seizing control. Furthermore, distributed key generation and distributed signing establish a dependency between users and the system, ensuring that neither side can produce a valid message or transaction without the other's explicit involvement. The Ethereum blockchain, on which eBSO is deployed, uses the Proof of Stake (PoS) consensus mechanism, introduced as part of the Ethereum Merge in September 2022. Under this model, validators are selected to propose and confirm new blocks based on the amount of ETH staked as collateral. Consensus on Ethereum is managed through a decentralized network of independent validators.
H.5: Incentive Mechanisms and Applicable Fees	There is no network fee in terms of BSO, we have processing fee and transaction fee. The processing fee goes to a gold pool, which is an incentive pool for the Blockben ecosystem. All transactions on the Ethereum blockchain, including transfers of eBSO, are subject to network transaction fees (commonly known as gas fees). These fees are denominated in ETH and vary based on network demand, transaction complexity, and block space availability.
H.6: Use of Distributed Ledger Technology	TRUE
H.7: DLT Functionality Description	Natrix's DLT is structured into clusters, with each cluster serving as its own permissioned ledger within a larger network. Data is kept in an immutable blockchain layer and also stored in a World State Machine (WSM) cache for rapid reads. All data is encrypted by default, and only authorized parties hold the corresponding decryption keys. The platform uses microservices (Executors and Ledger nodes) for transaction processing and block creation.

	No direct data transfer occurs across clusters. Instead, zero-knowledge proofs are exchanged. Each cluster effectively represents a separate financial institution. Natrix lightpaper: https://data.natrix.io/docs/Natrix_Lightpaper.pdf https://github.com/natrixofficial/npvdkgrs/blob/master/math/NPVDKGRS.pdf The Ethereum blockchain provides the core infrastructure for the operation of eBSO as an ERC-20 token. It enables the secure creation, storage, and transfer of eBSO tokens through a deployed smart contract that adheres to the ERC-20 standard. Key ledger functionalities include: • Token ownership tracking, with balances recorded against user wallet addresses, • Peer-to-peer transfers, executed via wallet applications and confirmed through Ethereum validators, • Allowance delegation, enabling third-party applications or contracts to transfer tokens on a holder's behalf,
H.8: Audit	TRUE The cryptographic parts have been checked by external mathematicians, by the Cryptography Department of Eötvös Lóránd Tudományegyetem (Hungary).
H.9: Audit outcome	The audit discovered no errors, meaning that the algorithm is functioning correctly. It also found an acceleration potential in the algorithm, which means that the cost associated with generating consensus and digital keys is could be reduced by about 20%.
Part F - Information on the risks	
I.1: Offer-Related and Admission to Trading Risks	Purchasers of BSO/eBSO should be aware of the following risks associated with the offering and subsequent holding of the token: • Market Risk: The value of BSO/eBSO is not guaranteed and may fluctuate based on supply and demand dynamics, platform activity, and market sentiment. • Lack of Investor Protections: As a utility token, BSO/eBSO is not covered by EU deposit guarantee or investor compensation schemes under Directive 2014/49/EU or Directive 97/9/EC. • Liquidity Risk: There is no guarantee of continuous or sufficient liquidity on any trading platform. Users may be unable to buy or sell eBSO at desired prices or volumes. Market depth and availability are determined by third-party exchange activity, not by BlockBen. • Price Volatility: Once admitted to trading, the price of eBSO is entirely determined by market forces. Fluctuations may occur due to demand, macroeconomic factors, or speculative activity. There is no price stabilization mechanism or issuer intervention. • Custody and Transfer Risks: In case of eBSO, users are responsible for securely managing their Ethereum wallets and private keys. Transfers and trades on public blockchains are irreversible. Loss of access credentials may result in the permanent loss of tokens. • Regulatory Risk: The legal treatment of utility tokens may evolve, and future regulatory developments could affect the token's usability, tradeability, or compliance status. • Technology and Operational Risk: BSO/eBSO relies on proprietary infrastructure (BlockBen) and Ethereum. Technical failures, security breaches, or smart contract vulnerabilities could impact token functionality or value. • Market Manipulation Risk: On unregulated exchanges, there may be a higher risk of market manipulation, wash

	trading, or fake volume. Token holders may be exposed to unfair trading conditions outside of BlockBen's control.
I.2: Issuer-Related Risks	Purchasers should be aware of the following issuer-related risks associated with BSO/eBSO: • Issuer Transition Risk: The initial public offering of BlockStock (BSO) was carried out by BlockBen Financial Services OÜ, an entity incorporated in Estonia. Subsequent operational management, including the maintenance of the BlockBen Wallet and the gold pool mechanism, was transitioned to BlockBen UAB, a Lithuanian-registered company. As of the date of this whitepaper, the role of the issuer has been assumed by BlockBen SIA, a Latvian-incorporated entity. Accordingly, the legal structure and jurisdiction governing BSO have changed since the original issuance, which may introduce transitional and regulatory alignment considerations for legacy and future token holders. • Regulatory Compliance Risk: The issuer must ensure ongoing compliance with multiple legal frameworks across jurisdictions Lithuania, Latvia, and EU-wide under MiCAR). Any non-compliance, delay in licensing, or changes in regulatory interpretation may affect its ability to operate or support the BlockStock ecosystem. • Operational Dependency Risk: The token's functionality depends on the uninterrupted operation of the BlockBen Wallet infrastructure, the gold pool accounting system, and associated blockchain services. Disruptions in these systems - whether technical, regulatory, or organizational - could materially impact token utility. • Governance and Oversight Risk: BlockBen SIA is a privately held company with centralized control over token infrastructure and key business functions. Strategic decisions, resourcing constraints, or shifts in operational priorities could affect the continued development or support of BSO/eBSO. • Legal Risk: legal uncertainties, potential lawsuits, or adverse legal rulings can pose significant risks to the issuer. Legal challenges may affect the legality, utility, or potentially value of BSO/eBSO. • Financial Risk: The issuer does not offer investor compensation or redemption rights and is not classified as a financial institution. In the event of insolvency, token holders have no preferential claim or guarantee over issuer assets. • Dependency on Key Third Parties: BlockBen SIA relies on third-party service providers for several critical components of its operations, including blockchain infrastructure (e.g., external Ethereum node providers), trading platform access (e.g., LBank), legal and regulatory advisory, and cloud hosting services. Any disruption, termination, or underperformance by these providers could impair BlockBen's ability to fulfill its obligations, maintain technical operations, or ensure compliance with applicable laws. The issuer has limited control over the internal processes, security posture, or continuity planning of these third parties, which may expose token holders to operational or regulatory risks. • Key Personnel Dependency: The operations and strategic direction of BlockBen SIA are currently dependent on a

	limited number of key individuals who hold specialized knowledge in regulatory compliance, blockchain architecture, and ecosystem development. The unavailability, departure, or prolonged incapacity of these individuals could disrupt business continuity, delay implementation of critical updates, or impair the issuer's ability to meet its obligations under MiCAR.
I.3: Crypto-Assets-related Risks	The following risks are inherent to the nature and functioning of the BSO/eBSO: • Market Volatility Risk: The value of BSO/eBSO is subject to price fluctuations and is not guaranteed or backed by a fixed reserve. Market demand, sentiment, or ecosystem activity may significantly affect token value. • Liquidity Risk: There is no assurance of a continuous or active secondary market for BSO or eBSO. Token holders may not be able to sell or exchange their tokens at desired prices or times. • Blockchain Dependency and Network Risks: eBSO operates on the Ethereum blockchain, which may be subject to congestion, delayed confirmations, or increased gas fees. BSO operates on the proprietary BlockBen infrastructure, which could be affected by technical failures, downtime, or malicious attacks. • Cybersecurity and Custody Risk: Holders are responsible for securely storing their private keys, wallet credentials, and platform access information. Loss, theft, or compromise of wallet access may result in permanent loss of tokens, with no possibility of recovery. • Regulatory Classification Risk: Although BSO/eBSO is structured as a utility token, evolving legal interpretations or jurisdictional changes may affect how the token is treated under national or EU law, including reclassification or new compliance obligations.
I.4: Project Implementation-Related Risks	• Cross-Chain Deployment Risk: BlockBen plans to expand BSO functionality to Binance Smart Chain (BSC) and introduce a cross-chain bridge. Delays, security vulnerabilities, or technical integration challenges could affect rollout, interoperability, or token utility across chains. • Bridge Security and Synchronization Risk: The planned cross-chain bridge must ensure the consistency and security of supply across Ethereum and BSC networks. Misalignment, software flaws, or cross-network discrepancies could disrupt user trust and value stability. • Exchange Listing Delays: While BlockBen intends to list BSO on regulated trading platforms under MiCAR, there is no guarantee of acceptance, timing, or liquidity. Regulatory approval processes may vary by jurisdiction and platform. • Licensing and Regulatory Approval Risk: The issuer is in the process of transitioning operations to Latvia and seeking CASP licensing under MiCAR. Any delays, rejections, or changes in licensing strategy may affect user access, regulatory positioning, and service continuity. • Ecosystem Growth and User Adoption: Continued token utility depends on growing user participation, platform features, and ecosystem integrations. Failure to scale the

	community or attract sufficient adoption could impact the perceived value or relevance of BSO. • Third-Party Service Risk: BlockBen relies on third parties for AML/KYC screening, blockchain infrastructure, and exchange support. Disruptions, service failures, or compliance breaches by these partners could hinder platform functionality or token operations.
I.5: Technology-Related Risks	1. Data and System Security Vulnerabilities: BlockBen faces a risk of losing control over its internal systems and the personal or business data it processes, due to factors such as unauthorized access, insufficient traceability or logging, inability to apply timely security updates, and lack of structured incident response protocols. Such weaknesses could result in operational disruptions, exposure of sensitive information, or failure to comply with data protection regulations. 2. GDPR and Data Subject Rights Gaps: There could be a lack of formally documented legal bases for data processing, insufficient transparency in data handling practices, and incomplete policies for managing data subject rights requests. These gaps may lead to non-compliance with the General Data Protection Regulation (GDPR), particularly Articles 5, 6, and 15–22. 3. Incident Management Deficiencies: BlockBen does not yet have a structured incident response framework in place. Employees may be unaware of how to report suspicious activity or security incidents, and there are no established severity classifications, escalation paths, or breach notification templates. This may hinder the company's ability to meet legal deadlines under GDPR and DORA, and to contain or recover from cyber incidents effectively. 4. Backup and Recovery Gaps: The organization lacks a verifiable, system-independent backup process. Without regular and secure backups, data and system availability cannot be assured in the event of loss, corruption, or a cyberattack, which poses risks to operational resilience and data integrity. 5. Access Control and Credential Management Weaknesses: BlockBen's access control measures are currently underdeveloped, with weak password practices and no centralized credential storage. This increases the risk of unauthorized access to critical systems or data, particularly in the absence of role-based access controls or credential audits. 6. Deficient Role Separation and Third-Party Dependency: There is a high dependency on external system administrators, without adequate internal redundancy or oversight mechanisms. This overreliance may compromise operational continuity, delay incident response, or increase vulnerability to third-party failures or security breaches.
I.6: Mitigation measures	1. Data & System Security Vulnerabilities: • Implement a centralized Identity and Access Management (IAM) system with role-based permissions. • Deploy multi-factor authentication (MFA) and session logging for all critical systems. • Maintain audit trails and change logs to enable traceability (DORA Art. 9). • Enforce regular patch management and vulnerability scans.

	2. GDPR & Data Subject Rights Gaps: • Conduct a GDPR gap assessment and implement a Record of Processing Activities (RoPA). • Create a public-facing privacy policy, with clear legal bases and purpose mapping. • Develop automated workflows for data subject requests (DSRs): access, rectification, erasure, etc. • Establish data retention and minimization policies for all personal data types. • Log all consents and user actions using cryptographic proof where possible (e.g., hash chains). 3. Incident Management Deficiencies: • Draft and approve a formal Incident Response Policy with defined roles and escalation matrix. • Set up an Incident Management Team (IMT) and assign a Security Officer. • Define incident severity levels and expected timelines (e.g., GDPR 72-hour rule). • Run simulation exercises and tabletop testing quarterly. 4. Backup & Recovery Gaps: • Use immutable, encrypted backups, stored outside primary infrastructure. • Automate daily incremental and weekly full backups. • Schedule quarterly disaster recovery tests and document restore times (RTO/RPO). • Assign accountability to a Business Continuity Lead (DORA Art. 11–12). 5. Access Control & Credential Weaknesses: • Implement a secure password vault (e.g., Bitwarden, HashiCorp Vault). • Enforce password rotation, complexity rules, and account lockout on failed attempts. • Enable role-based access controls (RBAC) tied to a centralized IAM system. • Review access rights quarterly and conduct privilege minimization reviews. • Educate staff with cybersecurity training on phishing and credential hygiene. 6. Deficient Role Separation and External Dependencies: • Develop an internal IT competency framework and assign in-house technical leads. • Require multi-person access approvals (four-eyes principle) for system changes. • Define service level agreements (SLAs), audit rights, and breach obligations in all third-party contracts. • Build and cross-train a replacement plan for all external critical roles. • Monitor critical third-party services under a Third-Party Risk Management Policy (DORA Art. 28–31).
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Part J - Information on the sustainability indicators in relation to adverse impact on the climate and other environment-related adverse impacts	
General information	
S.1: Name	BlockBen SIA
S.2: Relevant legal entity identifier	254900BBV7FA7LUG5913
S.3: Name of the crypto- asset	BlockStock (BSO/eBSO)
S.4: Consensus Mechanism	The consensus mechanism is primarily based on proof of identity and zero-knowledge proofs (ZK proofs), ensuring that verified proof data is replicated across the ledger nodes. This configuration enables two-

	phase commit and anti-monopolize measures, preventing any single node from seizing control. Furthermore, distributed key generation and distributed signing establish a dependency between users and the system, ensuring that neither side can produce a valid message or transaction without the other's explicit involvement. The Ethereum blockchain, on which eBSO is deployed, uses the Proof of Stake (PoS) consensus mechanism, introduced as part of the Ethereum Merge in September 2022. Under this model, validators are selected to propose and confirm new blocks based on the amount of ETH staked as collateral. Consensus on Ethereum is managed through a decentralized network of independent validators.
S.5: Incentive Mechanisms and Applicable Fees	In terms of BSO, there are no staking mechanisms, interest-bearing features, or fixed-yield rewards. Token holders are not entitled to profit sharing, dividends, or capital guarantees. eBSO operates on the Ethereum blockchain, which uses a Proof of Stake (PoS) consensus mechanism. Validators are incentivized through protocol-level rewards paid in ETH, which they earn for proposing and attesting to new blocks. These rewards are funded, in part, by gas fees paid by users interacting with the network. When users transfer eBSO or interact with its smart contract, they are required to pay a gas fee in ETH. This fee compensates validators for processing the transaction and securing the network. The gas fee amount varies depending on network congestion, transaction complexity, and user-set parameters. These fees are not collected by BlockBen or the eBSO smart contract and are unrelated to the gold pool mechanism associated with the token. Instead, they reflect the cost of transacting on Ethereum and are integral to the network's economic and operational security.
S.6: Beginning of the period to which the disclosure relates	2024-01-01
S.7: End of the period to which the disclosure relates	2024-12-31
Mandatory key indicator on energy consumption	
S.8: Energy consumption	62 kWh per year
S.9: Energy consumption sources and methodologies	The energy consumption and associated carbon emissions data presented herein are derived from the AWS Customer Carbon Footprint Tool, which calculates the environmental impact of AWS infrastructure services utilized by BlockBen SIA. This analysis specifically covers the period from January to August 2024, with figures proportionally annualized to reflect a full-year estimate. The AWS methodology considers actual service usage - in this case, Amazon EC2 instances only - and accounts for the regional carbon intensity of the hosting location (EU Central – Frankfurt). For the reporting period, AWS reported 0.004 tCO₂e emissions attributable to BlockBen's EC2 usage. To estimate total energy consumption (in line with MiCAR Section S.8), we applied AWS's regional carbon intensity factor for EMEA (~0.013 kgCO₂e/kWh). Based on this, the reported emissions correspond to an estimated annual electricity consumption of approximately 308 kWh. This consumption figure was allocated proportionally according to transaction activity: 80% to BlockStock (BSO) <i>Note: The AWS Carbon Footprint Tool currently reflects zero values from September 2024 onwards, which is presumed to result from delayed data release or quarterly reporting practices. Therefore, this disclosure relies on the most recent 8-month data and applies proportional extrapolation to complete the annual estimate.</i>
Supplementary key indicators on energy and GHG emissions	
S.10: Renewable energy consumption	99%

S.11: Energy intensity	0.062 kWh/Transaction
S.12: Scope 1 DLT GHG emissions – Controlled	0 tCO ₂ e (no physical infra). No Scope 1 emissions are reported, as Blockben operates no on-premises infrastructure, vehicles or direct energy sources. All operations are cloud-based.
S.13: Scope 2 DLT GHG emissions – Purchased	0.004 tCO ₂ e × 80% = ~0.0032 tCO ₂ e
S.14: GHG intensity	0,0032 kgCO ₂ e/Transaction
Sources and methodologies	
S.15: Key energy sources and methodologies	The electricity used for token validation is sourced from Amazon Web Services (AWS) infrastructure located in the EU Central (Frankfurt) region. According to AWS sustainability disclosures, approximately 99% of the electricity used in the EMEA region is derived from renewable sources, primarily wind and solar energy. To calculate energy intensity in accordance with MiCAR requirements, token-level annual energy consumption was divided by the respective annual transaction volume. This yields a granular view of electricity usage per transaction, supporting the assessment of environmental impact on a per-asset basis.
S.16: Key GHG sources and methodologies	Greenhouse gas (GHG) emission figures are derived from the AWS Customer Carbon Footprint Tool, which reports Scope 2 emissions based on the energy consumption of AWS services used by BlockBen. Scope 1 emissions are recorded as 0 tCO₂e, as BlockBen does not operate any on-premises infrastructure or company-owned energy production. Scope 2 emissions are calculated by AWS using region-specific energy mix and intensity data and reported in metric tonnes of CO₂-equivalent (tCO₂e). AWS's methodology adheres to internationally recognized standards, including the Greenhouse Gas Protocol. While the reporting entity (BlockBen) does not hold ISO 14064 certification, all disclosed data are based on verified cloud provider metrics. For the purpose of token-level emissions disclosure: • Total Scope 2 emissions reported by AWS for the January–August 2024 period were 0.004 tCO₂e. • Emissions were proportionally allocated based on estimated transaction volume: ○ BlockStock (BSO/EBSO): 80% share = 0.0032 tCO₂e. To calculate GHG intensity (S.14), this token-specific emission value was divided by the number of annual transactions.