

BLOCKBEN

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I.01: Date of notification

2026-08-17

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 exists in two technical forms: BSO, which operates natively on BlockBen's proprietary Qantrum blockchain and is integrated with the BlockBen platform and Wallet, and eBSO, which is issued as an ERC-20 token on the Ethereum network to facilitate interoperability, external transfers and trading through compatible wallets, crypto-asset service providers and trading venues. BSO and eBSO represent the same crypto-asset in different technical environments. A particular unit of BlockStock may exist either as BSO or as eBSO, but never simultaneously in both forms. Conversion is performed on a one-to-one basis by creating one representation while removing the other. Unless expressly stated otherwise, references to BSO/eBSO apply to both representations. BSO serves as BlockBen's platform token and provides access to ecosystem services and functionalities. Certain features are available exclusively to BSO held within the BlockBen Wallet, while eBSO is intended primarily for interoperability, external transfers and trading. StockLock is a utility feature available to eligible BSO holders within the BlockBen Wallet. StockLock operates in recurring cycles (ie. 12-months, less or more, in accordance with the GTC). Eligible holders may voluntarily lock a selected amount of BSO until the end of the applicable StockLock cycle. During the locking period, the locked BSO cannot be transferred unless the holder requests its release in accordance with the applicable StockLock rules. Using the StockLock feature may provide access to StockLock Benefits, including premium services, discounted fees, partner benefits, promotional campaigns, Early Access, Pre-Presale Access, Exclusive Events and other utility features made available by BlockBen from time to time. Eligible StockLockers may also receive allocations from the Locking Pool, which may contain various digital assets originating from BlockBen ecosystem activities. Allocation methodology may take into account factors such as the amount of locked BSO, the applicable StockLock tier and the BSO Power Multiplier. The BSO Power Multiplier is an internal weighting mechanism used solely for allocation purposes and does not increase the StockLocker's actual BSO balance, ownership rights or tier.

	Early Unlock does not affect ownership of the locked BSO, which remains the property of the StockLocker. However, it may result in applicable fees, the loss of StockLock Benefits and the forfeiture of allocations that have not yet become available, in accordance with the applicable StockLock rules. BSO/eBSO holders may request redemption through designated BlockBen support channels. Redemption requests are processed by the Offeror, BlockBen UAB, in accordance with the Official Redemption Methodology, applicable compliance requirements and operational procedures. The applicable Redemption Price is determined by the Offeror and published through its official communication channels. The Redemption Price is independent of the Market Price of BSO/eBSO and may be reviewed periodically in accordance with the Official Redemption Methodology. Redemption is supported by the Redemption Capability (ReCap) of the Offeror and remains subject to applicable compliance requirements and operational conditions. The rights, functionalities and utility features associated with BSO/eBSO may be modified in accordance with applicable law, the General Terms and Conditions and the applicable StockLock rules. Where required by applicable law, material changes will be communicated through BlockBen's official communication channels. BSO/eBSO is a utility token and does not confer ownership rights, shareholder rights, governance rights, voting rights, dividend rights or any entitlement to the profits, revenues or assets of the Offeror, BlockBen, or its affiliated entities.
I.09: Key information about the admission to trading	Admission to Trading For the purposes of admission to trading and trading on third-party crypto-asset trading platforms, references in this section primarily relate to eBSO, which is the Ethereum-based representation of BlockStock that may be transferred, deposited, withdrawn and traded through compatible external wallets, crypto-asset service providers and trading venues. Initial Public Offering The initial public offering of BSO was completed in 2021 by BlockBen Financial Services OÜ, an Estonian-registered entity. The tokens were issued through the BlockBen platform in accordance with the terms and conditions applicable at the time. As of the date of this white paper, the original public offering has concluded and no further public offering of BSO is being conducted. Secondary Market Trading BSO/eBSO holders may transfer tokens within supported BlockBen services, between compatible external wallets and, where available, through supported crypto-asset service providers and trading venues. Such transfers and transactions may be subject to applicable legal, regulatory and compliance requirements, including customer due diligence, transaction monitoring, sanctions screening and Travel Rule obligations.

	eBSO may be admitted to trading on one or more third-party crypto-asset trading platforms. BlockBen does not operate such platforms and does not guarantee their continued availability, liquidity, trading volume or trading conditions. BlockBen may seek admission of eBSO to additional trading venues, subject to applicable regulatory requirements and acceptance by the relevant platform. Market Liquidity The market price of eBSO is determined by market conditions and may fluctuate significantly. BlockBen does not guarantee any minimum market value, liquidity level or trading activity.
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Part A - Information about the offeror												
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	<table><tr><td>Name</td><td>Position/Function</td><td>Business Address</td></tr><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>	Name	Position/Function	Business Address	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		
Name	Position/Function	Business Address										
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 performing certain technical operations relating to crypto-assets in cooperation with its related entity BlockBen SIA (see details below), but is not providing crypto-asset services itself.											
A.14: Parent Company Business Activity	N/A There is no parent company of BlockBen UAB.											
A.15: Newly Established	FALSE											
A.16: Financial condition for the past three years	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.											
A.17: Financial condition since registration	N/A , see A.16.											

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	Rīga, Lāčplēša iela 37, LV-1011, Latvia		
A.4: Head office	Rīga, Lāčplēša iela 37, LV-1011, 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	Rīga, Lāčplēša iela 37, LV-1011, Latvia
	Attila Krocsek	Member of the Management Body	Rīga, Lāčplēša iela 37, LV-1011, Latvia
	Luize Berzina	Member of the Management Body; AML/CFT responsibility	Rīga, Lāčplēša iela 37, LV-1011, Latvia
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 (Qantrum), 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.
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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) is the primary ecosystem participation token within the BlockBen ecosystem. It is designed to support user engagement and provide access to ecosystem services, utility features and selected benefits available through the BlockBen platform. BSO operates on BlockBen's proprietary Qantrum blockchain infrastructure and enables eligible holders to use StockLock, a utility feature available within the BlockBen Wallet. Through StockLock, users may voluntarily lock BSO for a predefined locking period to become eligible for StockLock Benefits and allocations from the Locking Pool, subject to the applicable StockLock rules. The Locking Pool may contain various digital assets originating from BlockBen ecosystem activities. Eligible StockLockers may receive allocations from the Locking Pool in accordance with the applicable allocation methodology and program rules. eBSO is the Ethereum-based ERC-20 representation of BlockStock and is intended to facilitate interoperability, external transfers and trading through compatible wallets, crypto-asset service providers and trading venues. Certain utility features, including StockLock, are available only to BSO held within the BlockBen Wallet. BSO/eBSO does not confer ownership rights, shareholder rights, governance rights or any entitlement to the profits, revenues or assets of the Offeror, BlockBen or any affiliated entity.
D.5: Details of all natural or legal persons involved in the implementation of the crypto-asset project	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 and responsible for the implementation of the crypto-asset project..
D.6: Utility Token Classification	TRUE
D.7: Key Features of Goods/Services for Utility Token Projects	BSO and eBSO serve utility functions within the BlockBen ecosystem. Certain functionalities are available to both technical representations, while others are available

	exclusively to BSO held within the BlockBen Wallet. StockLock is a utility feature available to eligible BSO holders. Through StockLock, users may voluntarily lock BSO until the end of the applicable StockLock cycle to become eligible for StockLock Benefits and allocations from the Locking Pool, subject to the applicable StockLock rules. StockLock Benefits may include promotional campaigns, discounted fees, priority services, partner benefits, exclusive events, Early Access, Pre-Presale Access and other utility features made available by BlockBen from time to time. The Locking Pool may contain various digital assets originating from BlockBen ecosystem activities. Eligible StockLockers may receive allocations from the Locking Pool in accordance with the applicable allocation methodology. Allocation weighting may take into account factors including the applicable StockLock tier and the BSO Power Multiplier, which serves solely as an internal weighting mechanism and does not affect the holder's actual BSO balance or ownership rights. eBSO is the Ethereum-based representation of BlockStock and is intended primarily to facilitate interoperability, deposits, withdrawals, external transfers and trading through compatible wallets, crypto-asset service providers and trading venues.
D.8: Plans for the token	Planned and potential developments may include, for both BSO and eBSO unless expressly stated otherwise: • StockLock Development: Further development of the StockLock system, including participation tiers, ecosystem benefits, allocation programs and related utility features available to eligible participants. • Locking Pool Development: Expansion of the Locking Pool framework, including the inclusion of additional ecosystem-related digital assets and the development of allocation programs linked to ecosystem participation. • Ecosystem Services and Benefits: Introduction of additional utility features, promotional campaigns, discounted fees, priority services, partner benefits, exclusive events, early access opportunities and other ecosystem-related functionalities. • Enhanced Accessibility and Transferability: Continued development of deposit, withdrawal and transfer capabilities for BSO/eBSO, enabling broader accessibility through compatible wallets, crypto-asset service providers and trading venues, subject to applicable legal and regulatory requirements. • Trading Venue Expansion: BlockBen may seek admission of eBSO to additional crypto-asset trading platforms and trading venues in order to improve accessibility and market visibility. Any such admission remains subject to commercial considerations, regulatory requirements and acceptance by the relevant platform. • Interoperability and Technical Development: BlockBen may explore additional interoperability solutions and technical enhancements designed to improve accessibility, efficiency and compatibility across supported blockchain environments. The timing, scope and implementation of any future

	developments remain subject to technical feasibility, regulatory requirements, market conditions and business considerations.
D.9: Resource Allocation	Financial Resources: BlockBen allocates dedicated financial resources to support the ongoing operation and development of BSO/eBSO. This includes funding for maintaining the Qantrum blockchain infrastructure, the BlockBen platform, the StockLock system, the Locking Pool framework, regulatory compliance activities, and the integration and support of eBSO on external blockchain networks and trading venues. 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 and Innovation Development activities focus on expanding ecosystem functionalities, enhancing the StockLock, improving BSO/eBSO accessibility and interoperability, supporting the BSO Pool framework, strengthening compliance capabilities and introducing additional utility features and ecosystem services. 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 original public offering of BSO was conducted to facilitate participation in the BlockBen ecosystem and access

	to the utility features associated with BSO/eBSO. The admission to trading described in this section relates to eBSO, the Ethereum-based representation of BlockStock, which is intended to facilitate external transfers, interoperability and trading through compatible wallets, crypto-asset service providers and trading venues. The admission to trading of eBSO is intended to: • Improve accessibility to the BlockBen ecosystem and its utility-based services, programs and functionalities; • Enable users to acquire, hold, transfer, deposit and withdraw eBSO through compatible wallets, crypto-asset service providers and trading venues; • Enhance interoperability, transferability and market visibility of the token; and • Support the continued growth and development of the BlockBen ecosystem. BlockBen may seek admission of eBSO to additional crypto-asset trading platforms and trading venues, subject to applicable regulatory requirements and acceptance by the relevant platform.
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. 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	N/A
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. Currently, BSO is not offered for direct purchase through the BlockBen Wallet. BlockBen may, at its discretion, make direct purchases of BSO available through the Wallet or

	other BlockBen interfaces in the future, subject to applicable law, regulatory requirements and the implementation of appropriate safeguarding arrangements.
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, • 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, 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	BSO and eBSO serve utility functions within the BlockBen ecosystem. While both technical representations share the same core utility purpose, certain functionalities are available exclusively to BSO held within the BlockBen Wallet. BSO serves as the primary ecosystem participation token within the BlockBen platform. Eligible BSO holders may use StockLock, a utility feature that enables users to voluntarily lock BSO until the end of the applicable StockLock cycle in order to become eligible for StockLock Benefits and allocations from the Locking Pool, subject to the applicable StockLock rules. StockLock Benefits may include promotional campaigns, discounted fees, priority services, partner benefits, exclusive events, Early Access, Pre-Presale Access and other utility features made available by BlockBen from time to time. BSO also supports transaction validation and processing activities within the BlockBen ecosystem and its underlying Qantrum blockchain infrastructure. eBSO is the Ethereum-based representation of BlockStock and is intended primarily to facilitate interoperability, deposits, withdrawals, external transfers and trading through compatible wallets, crypto-asset service providers and trading venues. Neither BSO nor eBSO confer ownership rights, shareholder rights, governance rights, voting rights or any entitlement to the profits, revenues or assets of the Offeror, BlockBen or any affiliated entity.
F.3: Planned Application of Functionalities	BlockBen intends to continue developing the utility functions and ecosystem applications associated with BSO/eBSO, subject to technical feasibility, regulatory requirements, market conditions and business considerations. Planned and potential developments may include the further development of the StockLock benefits, including participation tiers, ecosystem benefits, allocation programs and related utility features available to eligible participants. BlockBen may also expand the range of ecosystem services and benefits available to BSO holders, including promotional campaigns, discounted fees, priority services, exclusive events, partner benefits, early access opportunities and other ecosystem-related functionalities.

	Further development of the Locking Pool framework may include the inclusion of additional ecosystem-related digital assets and the enhancement of allocation programs linked to ecosystem participation. In addition, BlockBen may continue to develop deposit, withdrawal, transfer and interoperability functionalities for BSO/eBSO and may seek admission of eBSO to additional crypto-asset trading platforms and trading venues, subject to applicable legal and regulatory requirements. Any future functionality, service or program remains subject to applicable laws, technical implementation requirements and business considerations.
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	MODI
F.6: Crypto-Asset Characteristics	BlockStock exists in two technical forms: BSO, which is issued and maintained within BlockBen's proprietary Qantrum blockchain infrastructure, and eBSO, which is issued as an ERC-20 token on the Ethereum network. BSO and eBSO represent the same crypto-asset in different technical environments while serving the same core utility purpose within the BlockBen ecosystem. BSO serves as the primary ecosystem participation token within the BlockBen platform. Eligible BSO holders may use StockLock, a utility feature that provides access to StockLock Benefits and allocations from the Locking Pool, subject to the applicable StockLock rules. Certain utility features are available exclusively to BSO held within the BlockBen Wallet. eBSO is intended primarily to facilitate interoperability, deposits, withdrawals, external transfers and trading through compatible wallets, crypto-asset service providers and trading venues. BSO/eBSO do not confer ownership rights, shareholder rights, governance rights, voting rights or any entitlement to the profits, revenues or assets of BlockBen or any affiliated entity. BSO/eBSO may be held, transferred and used in accordance with applicable technical, legal and compliance requirements.
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	2026-08-26
F.10: Publication date	2026-08-26
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	CRV5Q842B
F.15: Functionally Fungible Group Digital Token Identifier,	P3X0N9DDQ

where available	
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

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

G.1: Purchaser Rights and Obligations	Purchasers of BSO/eBSO acquire a utility token designed for use within the BlockBen ecosystem and access to selected ecosystem services and functionalities. Certain rights and functionalities apply to both BSO and eBSO, while others are available exclusively to holders of BSO maintained within the BlockBen Wallet. Rights • Access to ecosystem services, utility features and functionalities made available by BlockBen from time to time. • For eligible holders of BSO maintained within the BlockBen Wallet, the ability to use StockLock, subject to the applicable StockLock rules, and thereby become eligible for StockLock Benefits and allocations from the Locking Pool.
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	• The ability to hold, transfer and use BSO/eBSO in accordance with applicable technical, legal and compliance requirements. • The ability to request redemption of BSO/eBSO through BlockBen's designated support channels. Redemption requests are processed by the Offeror, BlockBen UAB, in accordance with the Official Redemption Methodology and the applicable published Redemption Price. Limitations • BSO/eBSO do not grant ownership rights, shareholder rights, governance rights, voting rights, dividend rights or any entitlement to the profits, revenues or assets of the Offeror, BlockBen or any affiliated entity. • StockLock, the Locking Pool and certain utility features are available exclusively to holders of BSO maintained within the BlockBen Wallet. • StockLock Benefits, allocation methodologies, utility features and related eligibility criteria may be modified, expanded or discontinued in accordance with applicable law and BlockBen's terms and policies. • The market value of BSO/eBSO may fluctuate, and holders bear the risks associated with holding, transferring and using the token. Obligations Holders using BlockBen services must: • Comply with BlockBen's Terms and Conditions and applicable policies. • Complete any required customer due diligence, KYC and AML/CFT verification procedures. • Use BSO/eBSO in accordance with applicable laws, regulations and platform requirements. • Comply with applicable sanctions, anti-financial crime and other compliance requirements. Holders using external wallets, crypto-asset service providers or trading platforms are additionally subject to the terms, conditions and technical requirements of the relevant third-party providers.
G.2: Exercise of Rights and obligations	BSO/eBSO holders may exercise their rights through the relevant BlockBen services, supported wallets and other interfaces made available from time to time. Certain rights and functionalities are available to both BSO and eBSO holders, while others are available exclusively to holders of BSO maintained within the BlockBen platform. Eligible BSO holders may exercise rights associated with StockLock by locking BSO in accordance with the applicable StockLock rules. Depending on the applicable eligibility criteria, this may provide access to StockLock Benefits, allocations from the Locking Pool and other utility features made available by BlockBen from time to time. BSO/eBSO holders may request redemption through BlockBen's designated support channels. Redemption requests are processed by the Offeror, BlockBen UAB, in accordance with the applicable redemption methodology,

	operational procedures and compliance requirements. To exercise rights within the BlockBen ecosystem, users may be required to: • Complete and maintain applicable customer due diligence, KYC and AML verification requirements; • Use supported services, wallets and technical interfaces; • Comply with the General Terms and Conditions and other applicable policies; • Comply with applicable laws, regulations and compliance requirements. Holders using external wallets, crypto-asset service providers or trading venues remain subject to the terms, conditions and technical requirements of the relevant third-party providers.
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 and eBSO serve utility functions within the BlockBen ecosystem. Certain functionalities are available to both token representations, while others are available exclusively to BSO held within the BlockBen platform. • StockLocking: Holders of BSO may use the StockLock feature through the BlockBen platform. The program enables eligible users to commit and lock BSO for the applicable participation period and gain access to ecosystem-related benefits, allocation programs and premium features. • StockLock Benefits: Eligible participants may access promotional campaigns, discounted fees, priority services, exclusive events, partner benefits, early access opportunities and other ecosystem-related benefits made available by

	BlockBen from time to time. • Locking Pool: Eligible StockLockers may receive allocations from the Locking Pool, which may contain various digital assets originating from BlockBen ecosystem activities. Allocation methodology may take into account factors including the applicable StockLock tier and the BSO Power Multiplier, which serves solely as an internal weighting mechanism and does not affect token ownership or token balance. • Interoperability and Transferability: eBSO serves as the Ethereum-based representation of BlockStock and is intended primarily to facilitate deposits, withdrawals, external transfers, interoperability and trading through compatible wallets, crypto-asset service providers and trading venues.
G.8: Utility Tokens Redemption	BSO/eBSO holders may request redemption through BlockBen's designated support channels, subject to applicable procedures, compliance requirements and operational conditions. Redemption requests are processed by the Offeror, BlockBen UAB, in accordance with the applicable redemption methodology and operational procedures. The applicable redemption price is determined by the Offeror and communicated through its official communication channels. The redemption price is published at least once per calendar year and no more frequently than once per calendar month. The Offeror may communicate the applicable redemption price through its own official channels or, where agreed, through the Issuer's official website or other designated communication channels. The published redemption price applies uniformly to eligible redemption requests submitted during the applicable period. Redemption may be settled through supported digital assets and may be subject to minimum thresholds, processing requirements, customer due diligence requirements, sanctions screening, transaction monitoring, Travel Rule obligations where applicable, and other operational or compliance limitations. The redemption process is separate from the StockLock and any allocation programs linked to the Locking Pool. Participation in the StockLock program does not guarantee redemption and redemption does not affect any rights or obligations arising under the applicable Ecosystem Participation Program rules.
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 available only to users who have completed the applicable customer due diligence and verification procedures, in accordance with AML/CFT requirements, Travel Rule obligations and BlockBen's internal policies. eBSO may be transferred on the Ethereum blockchain using compatible wallets and supported crypto-asset service providers. Such transfers may be subject to applicable legal, regulatory and technical requirements, including sanctions

	screening, transaction monitoring and Travel Rule obligations where required by law. Crypto-asset service providers, wallet providers and trading platforms may impose additional restrictions, requirements or limitations on the transfer, deposit, withdrawal, custody or trading of eBSO in accordance with their own policies, procedures and applicable laws.
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 this white paper, ongoing operations of the BlockBen ecosystem and support for the use of BSO/eBSO are managed by BlockBen SIA, a crypto-asset service provider authorised in Latvia under Regulation (EU) 2023/1114 (MiCAR).
G.19: Competent court	Courts of Republic of Latvia

Part H - information on the underlying technology

H.1: Distributed ledger technology	Qantrum 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 Qantrum 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	Qantrum 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 Qantrum 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 NPVDKG-RS) 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) • Qantrum 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 Qantrum architecture allows for temporary or forever freezes without exposing private keys. By integrating these cryptographic and architectural features, Qantrum 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	Within the BlockBen ecosystem, certain transactions may be subject to processing fees, transaction fees or other applicable service fees in accordance with BlockBen's Terms and Conditions and the relevant product or service documentation. A portion of certain fees and other ecosystem-related revenues may be allocated to the BSO Pool. The BSO Pool may contain various digital assets originating from ecosystem activities and may be used in connection with allocation programs and ecosystem benefits available through the Ecosystem Participation Program, subject to the applicable program rules. Participation in the Ecosystem Participation Program is voluntary and available only to eligible holders of BSO maintained within the BlockBen platform. Participation

	may provide access to ecosystem-related benefits, allocation programs and premium features, subject to applicable eligibility criteria and program conditions. All transactions on the Ethereum blockchain involving eBSO are subject to applicable network transaction fees (commonly referred to as gas fees). Such fees are denominated in ETH and are determined by the Ethereum network. BlockBen does not control or receive such network fees.
H.6: Use of Distributed Ledger Technology	TRUE
H.7: DLT Functionality Description	Qantrum'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. 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 I - 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 that holders will be able to transfer, dispose of or redeem BSO/eBSO at desired prices, volumes or times. Liquidity may be affected by market conditions, user demand, redemption activity, ecosystem participation levels and other factors outside the control of BlockBen and the Offeror. • Trading Venue Liquidity Risk: Trading liquidity for eBSO on third-party crypto-asset trading platforms may be limited or unavailable at any given time. Holders may be unable to buy or sell eBSO at desired prices or volumes. Market depth, trading activity and availability of trading pairs are determined by third-party market participants and trading venues, not by BlockBen. • Price Volatility: The value of BSO/eBSO may fluctuate significantly due to market demand, trading activity, ecosystem developments, redemption activity, macroeconomic factors or speculative market behaviour. Neither BlockBen nor the Offeror guarantees any minimum market value or price stability for BSO/eBSO. • Redemption Risk: Although BlockBen may provide a redemption mechanism, redemption requests may be subject to operational procedures, compliance requirements, pricing methodologies, processing times and other limitations. Redemption values may differ from prevailing market prices. • 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. • Trading Venue Risk: Trading platforms, wallet providers and crypto-asset service providers may suspend, restrict or terminate support for BSO/eBSO. BlockBen does not control third-party platforms and cannot guarantee their continued availability. 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 responsibilities

	relating to the BlockBen ecosystem were assumed by BlockBen UAB, a Lithuanian-registered company. As of the date of this white paper, the role of the issuer has been assumed by BlockBen SIA, a Latvian-incorporated entity. Changes in legal structure, operational responsibilities and applicable jurisdictions may create transitional, operational or regulatory challenges that could affect the BlockBen ecosystem.. • 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 functionality of BSO/eBSO depends on the continued operation of the BlockBen platform, the Ecosystem Participation Program, the BSO Pool framework, the Qantrum blockchain infrastructure and associated technology systems. Technical failures, operational disruptions or cyber incidents could adversely affect token functionality or availability. • 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. • Insolvency and Investor Protection Risk: BlockBen SIA is not a credit institution, investment firm or deposit-taking institution. BSO/eBSO holders are not protected by deposit guarantee schemes or investor compensation schemes. In the event of insolvency or financial distress affecting the issuer or the Offeror, token holders may lose some or all of the value associated with BSO/eBSO and have no preferential claim over issuer assets. • Dependency on Key Third Parties: BlockBen relies on third-party providers for certain critical services, including blockchain infrastructure, cloud hosting, technology solutions, regulatory support and trading venue access. Disruptions, failures or termination of such services may adversely affect operations and service availability. • 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
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	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. • Redemption Risk: Any redemption mechanism made available by BlockBen may be subject to operational procedures, compliance requirements, pricing methodologies, processing times and other limitations. Redemption values may differ from prevailing market prices. • Ecosystem Development Risk: The utility features and functionalities associated with BSO, including StockLock, StockLock Benefits and the Locking Pool, may evolve, be modified, expanded or be discontinued over time as the BlockBen ecosystem develops. • 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 required to maintain ongoing compliance with MiCAR and other applicable legal and regulatory requirements. Regulatory changes, differing interpretations or supervisory actions may affect the issuer's operations, the availability of services or the continued development of the BlockBen ecosystem. • Ecosystem Growth and User Adoption: The long-term utility and relevance of BSO/eBSO depend on continued ecosystem development, user adoption and the successful introduction of new services, programs and partnerships.. • 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	BSO/eBSO are utility tokens and do not provide holders with ownership rights, shareholder rights, dividend rights, profit-sharing rights, capital guarantees or fixed-income features. BSO does not incorporate staking, interest-bearing mechanisms or guaranteed yield-generating features. Use of the StockLock feature is voluntary and is intended to provide eligible BSO holders with access to StockLock Benefits, allocations from the Locking Pool and other utility features in accordance with the applicable StockLock rules. Any StockLock Benefits, allocations or other utility features are not guaranteed and may be modified, suspended or discontinued in accordance with applicable law, the General Terms and Conditions and the applicable StockLock rules. Certain transactions and services within the BlockBen ecosystem may be subject to processing fees, transaction fees or other applicable service fees. A portion of certain fees and other ecosystem-related revenues may be

	allocated to the BSO Pool in accordance with the applicable operational framework and program rules. eBSO operates on the Ethereum blockchain. Transfers of eBSO and interactions with the related smart contract infrastructure require payment of applicable Ethereum network transaction fees (commonly referred to as gas fees), which are denominated in ETH and determined by the Ethereum network. Such fees are paid to network validators and are not collected by BlockBen. The amount of Ethereum network fees may vary depending on network congestion, transaction complexity and other factors outside BlockBen's control.
S.6: Beginning of the period to which the disclosure relates	2025-01-01
S.7: End of the period to which the disclosure relates	2025-12-31
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) 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.
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 tCO₂e (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.