# Notcoin ($NOT)
# White Paper

# 00 TABLE OF CONTENT

## 01 DATE OF NOTIFICATION

18 September 2025

To ensure compliance with the legal requirements set forth under the Regulation (EU) 2023/1114 - Markets in Crypto-Assets Regulation (MiCAR), the Issuer hereby declares the following:

### COMPLIANCE STATEMENTS

02 **Statement in accordance with Article 6(3) of Regulation (EU) 2023/1114:** This crypto-asset white paper has not been approved by any competent authority in any Member State of the European Union. The offeror of the crypto-asset is solely responsible for the content of this crypto-asset white paper. In accordance with Article 13(4) of Regulation (EU) 2023/1114, the 14-day right of withdrawal for retail purchasers does not apply to $NOT. The reason is that $NOT had already been admitted to trading on a trading platform for crypto-assets before any retail purchase in the Union could occur. Consequently, holders of $NOT are not entitled to any statutory or contractual refund or cooling-off period in respect of their purchases of the token.

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.

04 **Statement in accordance with Article 6(5), points (a), (b), of Regulation (EU) 2023/1114:** The crypto-asset referred to in this white paper may lose its value in part or in full, may not always be transferable and may not be liquid.

05 **Statement in accordance with Article 6(5), point (d) of Regulation (EU) 2023/1114:** The utility token referred to in this white paper may not be exchangeable against the good or service promised in this white paper, especially in the case of a failure or discontinuation of the crypto-asset project.

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

### SUMMARY

07 **Warning**

This summary should be read as an introduction to the crypto-asset whitepaper. 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 (36) or any other offer document pursuant to Union or national law.

## 08 Characteristics of the crypto-asset

**Token type and standard**

$NOT is a Jetton-v1 utility token issued on The Open Network (TON).

**Total Supply**

102,456,956,826.91 tokens (fixed at TGE in April 2024, with mint authority permanently revoked).

**Core utilities**

$NOT is the native utility token of the Notcoin digital ecosystem, originating from the Telegram tap-to-earn game. It is essential for converting in-game balances, redeeming Pre-Market vouchers, accessing campaign participation, and serving as the governance weight in the future NOT DAO.

**Key Characteristics:**

- **Community-first distribution**: $NOT was distributed primarily through the completed Telegram tap-to-earn mining phase, with no private rounds or preferential allocations. Pre-Market vouchers provided early liquidity, redeemable for $NOT post-TGE.
- **Ecosystem integration**: $NOT powers current and future Notcoin services, including **NOT Gaming** (token-gated gameplay, upgrades, and utilities) and **NOT Earn** (unified reward system for Web3 campaigns).
- **Fixed-supply model**: The token supply is capped at 102,456,956,826.91, with no possibility of future issuance. Liquidity support is funded by a 20% royalty on Pre-Market voucher trades, not through inflation.
- **TON-native settlement**: As a Jetton token, $NOT is seamlessly transferable across TON-compatible wallets and DEXs, and tradable on centralized exchanges that support TON assets.

- **Future governance utility**: $NOT will serve as the governance weight in the planned **NOT DAO**, enabling community-driven decision-making over roadmap and ecosystem priorities.

**Purchaser Rights and Obligations**

Purchasers who acquire $NOT obtain the following entitlements and accept the corresponding obligations:

**Rights**

- **Platform Utility:** $NOT may be used within the Notcoin ecosystem to convert tap-to-earn mining balances, redeem Pre-Market vouchers, participate in Web3 campaigns, and (roadmap) access utilities such as NOT Gaming, NOT Earn, and governance in the planned NOT DAO.
- **Free Transferability:** $NOT is a Jetton-v1 token on TON and may be transferred between TON-compatible wallets or traded on supported centralized and decentralized exchanges, subject to applicable securities and taxation laws in the holder's jurisdiction.
- **Community Participation:** Holders may join future governance processes through the DAO once launched, using $NOT as their voting weight.

**Obligations**

- **Legal compliance**: Purchasers are required to comply with all relevant laws and regulations, fulfil their tax obligations, and complete any KYC/AML checks imposed by exchanges or other service providers.
- **Wallet security**: Purchasers are responsible for safeguarding their private keys and recovery phrases. The issuer does not provide custodial services and cannot restore lost or compromised $NOT.
- **Use of official channels**: Holders are expected to interact only with the official Notcoin bot, website, and verified smart contracts to avoid scams or phishing attempts.

**Modification of Rights and Obligations**

Rights and obligations associated with $NOT purchasers may be modified:

- **Community-driven governance**: The Notcoin roadmap provides for the creation of the NOT DAO, a decentralized governance framework where token holders will be able to vote on matters such as treasury use, campaign incentives, marketplace integrations, and ecosystem grants. Proposals that achieve the required participation threshold will be executed by smart contract on TON and permanently recorded on-chain.

- **Document updates and regulatory filings**: If legal, technical, or operational circumstances evolve, the issuer will issue an updated version of this white paper (or successor documentation) and file it with the competent EU authority under MiCAR. The amended text will be published on the project's official website and Telegram channel before taking effect.

$NOT remains a pure utility token, intended for use in campaign participation, voucher redemption, in-app utilities, and community governance once the DAO is launched. Holders must comply with enacted community decisions and all applicable laws and tax obligations in their jurisdiction. Because both the platform and regulatory landscape evolve, the rights and duties linked to $NOT can be amended transparently through the processes above, ensuring the token keeps pace with the needs of the network and its users.

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

$NOT provides access to a range of goods and services within the Notcoin ecosystem, with utilities designed around its Telegram-native and TON-native infrastructure:

- **Conversion of tap-to-earn balances**: Holders may redeem balances mined during the completed Telegram "tap-to-earn" game phase for $NOT, on a one-time basis. This ensures a community-first distribution without private sales or preferential allocations.
- **Pre-Market voucher redemption**: Players who minted NFT vouchers before the token generation event (TGE) can redeem them at any time for $NOT. Secondary trading of vouchers on Getgems carries a 20% royalty, the proceeds of which are reserved for liquidity provisioning.
- **Campaign participation (NOT Earn)**: $NOT will serve as the participation and reward unit in Web3 campaigns, daily missions, and referral tasks, without implying financial returns or profit rights.
- **Gaming utilities (NOT Gaming)**: Planned integrations will embed $NOT as the exclusive medium of exchange for in-app game modes, upgrades, boosts, and additional play functions within Telegram and partner applications.
- **Governance**: Once launched, the NOT DAO will allow $NOT holders to use their tokens as voting weight in proposals relating to treasury deployment, campaign incentives, ecosystem

development, and incentives in Partner Projects for being an active ecosystem contributor or NOT holder.

- **Community and social features**: Token-balance gating may grant access to premium Telegram channels, exclusive events, or seasonal content drops, anchoring social participation to token ownership.
- Purchase physical goods in places like store.notcoin.org

**Transferability Restrictions**

- **On-chain**: $NOT is a fungible Jetton-v1 token on TON and is freely transferable between TON-compatible wallets (e.g., Tonkeeper, MyTonWallet, Telegram Wallet Bot). All transfers require a small network fee in Toncoin (TON).
- **Exchange-based**: Transfers via centralized exchanges that list $NOT are subject to each venue's terms, including KYC/AML requirements.
- **Vouchers**: Pre-Market vouchers were transferable as NFTs prior to redemption; after redemption, $NOT itself has no lock-ups or technical restrictions on circulation.
- **Treasury reserves**: Allocations held for liquidity, listings, or future ecosystem development may be time-locked or released gradually, but once distributed, $NOT tokens are freely transferable.

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

**Admission to Trading**

The $NOT utility token was never sold to the public. All 102,456,956,826.9 tokens were minted at genesis on TON and immediately allocated to the community via the completed Telegram tap-to-earn mining phase and Pre-Market voucher redemption. Because all balances were earned in-game or through vouchers, the effective acquisition price was zero TON. Accordingly, there were no minimum or maximum subscription targets, no discounted early-bird phases, and no subscription fees.

Admission to trading will happen in stages. Liquidity is provided through the 20% royalty fee applied to secondary voucher trades on Getgems, which is earmarked for liquidity support, and through reserves designated for exchange listings. Liquidity will be deposited on TON-native DEX pools and on MiCAR-compliant centralized exchanges once their listing reviews are complete. No paid placing agent or market-making firm has been engaged; transfers are executed directly from the project treasury on a best-effort, no-fee basis. Each venue will announce its own opening time and first-print reference price after it receives the on-chain transfer. Prospective holders who missed the mining phase or voucher redemption may acquire $NOT on these venues or via peer-to-peer TON transfers once trading is live. Purchased tokens are freely transferable, save for any KYC/AML requirements the exchange itself applies.

**Offer Disclaimer**

The material presented in this Whitepaper is not intended as business, legal, financial, or tax advice. It must not be viewed as a recommendation by the Issuer, its officers, employees, or agents for any person to acquire or trade $NOT tokens. Any decision to purchase $NOT should be made solely on the basis of this Whitepaper and any officially released addenda or supplements. Except where required by applicable law, the Issuer assumes no obligation to update or revise the contents of this document. Readers should therefore not rely on the information contained herein after the date of publication. By receiving this Whitepaper, you acknowledge that you have relied solely on the information contained herein. No external statements or representations should be considered authorized unless explicitly included in this document.

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

### A.1 Name

NOTCOIN LLC

### A.2 Legal Form

LLC (Limited Liability Company)

### A.3 Registered Address

Suite 305, Griffith Corporate Centre, Beachmont, Kingstown, Saint Vincent and the Grenadines.

### A.4 Head Office

Suite 305, Griffith Corporate Centre, Beachmont, Kingstown, Saint Vincent and the Grenadines.

### A.5 Registration Date

2023-12-12

### A.6 Legal Entity Identifier

N/A

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

N/A

### A.8 Contact Telephone Number

+420776513613

### A.9 E-mail Address

omar.el.sohl@blockchainlegals.com

legals@tonstarter.com

### A.10 Response Time (Days)

Typically, inquiries are responded to within 1 to 5 business days. More complex requests may take up to 15 days.

## A.11 Parent Company

N/A

## A.12 Members of the Management Body

| Full Name | Business Address | Function |
|---|---|---|
| Josef CRHA | Blodkova 2, 130 00, Praha 3, Czechia. | Member of the Company |

## A.13 Business Activity

**Notcoin LLC** oversees the $NOT ecosystem on TON, including token minting and operations, the Tap-to-Earn application, the Notcoin Bot and Telegram Mini App, the store.notcoin.org marketplace, and related integrations, listings, and community-driven services.

## A.14 Parent Company Business Activity

N/A

## A.15 Newly Established

True, established on December 12, 2023.

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

N/A

## A.17 Financial Condition Since Registration

N/A. The company is exempted from any taxes as indicated in its corporate documents, the issuer does not have figures or financial statement records.

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

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

False

# C. Part C - Information about the operator of the trading platform in cases where it draws up the crypto-asset white paper and information about other persons drawing the crypto-asset white paper pursuant to Article 6(1), second subparagraph, of Regulation (EU) 2023/1114

## C.1 Name

N/A

## C.2 Legal Form

N/A

## C.3 Registered Address

N/A

## C.4 Head Office

N/A

## C.5 Registration Date

N/A

## C.6 Legal Entity Identifier

N/A

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

N/A

## C.8 Parent Company

N/A

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

N/A

## C.10 Members of the Management Body

N/A

## C.11 Operator Business Activity

N/A

## C.12 Parent Company Business Activity

N/A

## C.13 Other persons drawing up the white paper under Article 6 (1) second subparagraph MiCAR

N/A

# D. PART D - INFORMATION ABOUT THE CRYPTO-ASSET PROJECT

## D.1 Crypto-Asset Project Name

Notcoin

## D.2 Crypto-Assets Name

Notcoin Utility Token

## D.3 Abbreviation (Ticker Symbol)

$NOT

## D.4 Crypto-Asset Project Description

Notcoin is a Telegram-native tap-to-earn game that transforms user interactions into real economic value. Users accumulate Notcoins by tapping a digital coin within the Telegram app. With a focus on accessibility and mass adoption, the project lowers the barrier to crypto participation and is deeply rooted in a fair, community-first philosophy. Now operating on the TON Blockchain, Notcoin bridges in-game achievements with blockchain utility, enabling trading, governance, and decentralized engagement through the $NOT token.

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

| Full Name | Business Address | Function |
|---|---|---|
| JOSEF CRHA | Blodkova 2, 130 00, Praha 3, Czechia. | Member of the Company |
| MIR OMAR EL SOLH | Holeckova 619/59, Praha, 15000, Czechia | Manager of the Company |
| SASHA PLOTVINOV | 101 New Cavendish Street, 1st Floor South, London, W1W 6XH, United Kingdom | Co- Founder |
| SERGEY CHIKIREV | 101 New Cavendish Street, 1st Floor South, London, W1W 6XH, United Kingdom | Co- Founder |
| Blockchain Legals International Ltd | Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro, Republic of the Marshall Islands MH96960 | Legal Consultancy |

## D.6 Utility Token Classification

True. The crypto-asset qualifies as a utility token under MiCAR

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

The $NOT token grants access to the broader Notcoin ecosystem, including:

- Participation in NOT Gaming experiences and mini-apps on Telegram;
- Redeeming earned Notcoin tokens for pre-market vouchers and tokenized bonds;
- Accessing NOT Earn campaigns that reward users for engaging with Web3 projects;
- Future integrations for DAO governance, allowing holders to shape the evolution of Notcoin;

- Trading functionality for NFT-bonded Notcoin assets on third-party marketplaces like GetGems.

## D.8 Plans for the Token

At the token-generation event in April 2024 the entire fixed supply of 102,456,956,826.91 $NOT was minted on the TON blockchain. No further issuance is technically possible, as the mint authority has been permanently revoked. Distribution derives from the completed Telegram tap-to-earn mining phase, where balances earned in-game may be converted to $NOT on a one-time basis, ensuring community-first allocation without private rounds or preferential pricing.

To facilitate early liquidity, players were able to convert their balances into Notcoin Pre-Market vouchers (NFTs) during March 2024. These vouchers remain redeemable for $NOT at any time after TGE. Secondary trading of vouchers on the Getgems marketplace is subject to a 20% royalty fee, the proceeds of which are reserved for liquidity support at token listing.

Post-launch, the issuer will deploy designated reserves to secure quotations on centralized venues and deepen TON-based DEX pools, widening regulated market access for European users. No additional $NOT supply will ever be created, and no entitlement to dividends, profit-shares, buy-backs or other forms of financial return attached to the token.

Future integrations of $NOT are expected to include:

- NOT Gaming: $NOT as the sole medium for in-app game modes, upgrades and additional play functions within Telegram and partner applications.
- NOT Earn: conversion of Web3 campaigns into a unified reward system where $NOT serves as the participation and distribution unit, without implying profit-sharing or guaranteed returns.
- NOT DAO: token-holders may use $NOT to signal preferences on non-financial ecosystem matters such as feature prioritization and campaign design, without acquiring ownership rights, revenue entitlements or enforceable claims.

Additional integrations across TON ecosystem dApps are under development but will not alter the fixed-supply model.

## D.9 Resource Allocation

At genesis the project minted a fixed supply of 102,456,956,826.91 $NOT on the TON blockchain. Balances earned during the Telegram tap-to-earn phase may be converted one-time into $NOT, ensuring a broad community allocation. A portion of the supply is reserved to support exchange listings and liquidity pools (see D.8), but no detailed breakdown of allocations to team, treasury, ecosystem or marketing has been disclosed to date.

The project originated as a community-driven experiment, with initial resources primarily directed toward marketing initiatives that supported the growth of its online presence. Over time, the ecosystem has evolved, giving rise to additional projects developed by independent contributors. These affiliated initiatives generate their own resources, which may indirectly benefit the broader ecosystem.

Notcoin itself does not maintain a centralized treasury, liquidity reserve, or formal financial resources. The distribution of tokens is largely organic, with the majority of supply held by community members and independent builders who actively contribute to the ecosystem's development.

## D.10 Planned Use of Collected Funds or Crypto-Assets

The project has not conducted a presale, private round or venture-capital fundraising. No proceeds from token sales have been collected by the issuer.

The only mechanism generating crypto-assets before the token launch is the Pre-Market NFT voucher system implemented on GetGems. As confirmed by marketplace listings, vouchers such as "10 000 $NOT Voucher" and "100 000 $NOT Voucher" are explicitly exchangeable for $NOT tokens after the token generation event. All peer-to-peer trades of these vouchers incur a 20 % royalty fee, with all proceeds reserved solely for liquidity support during the token listing process.

Beyond this mechanism, no detailed allocation of collected funds or crypto-assets has been disclosed.

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

## E.1 Public Offering or Admission to Trading

ATTR

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

The issuer is pursuing admission of the $NOT token to trading on MiCAR-compliant EU platforms to ensure broad and transparent market access for the millions of users who earned Notcoin balances during the Telegram mining phase. Admission to trading will provide the necessary liquidity for those community allocations and allow the token to function effectively as the medium of participation across the Notcoin ecosystem.

Since launch, $NOT has only been available through community channels: first as balances mined in the Telegram tap-to-earn game, and later through Pre-Market vouchers minted and traded on the TON-based marketplace Getgems. Voucher holders may redeem these NFTs for $NOT following the token-generation event, with all royalty proceeds reserved for liquidity support. The issuer receives no direct proceeds from secondary-market trades but may deploy a portion of its reserves to support listings, deepen TON DEX pools, and finance further ecosystem development.

No future public token offering is planned. The $NOT token is distributed solely through private agreements, protocol incentives, and marketplace activity in accordance with published vesting schedules and network governance rules.

## E.3 Fundraising Target

N/A

## E.4 Minimum Subscription Goals

N/A

## E.5 Maximum Subscription Goals

N/A

## E.6 Oversubscription Acceptance

N/A

### E.7 Oversubscription Allocation

N/A

### E.8 Issue Price

N/A

### 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

102,456,956,826.91

### E.13 Targeted Holders

ALL

### E.14 Holder Restrictions

N/A

### E.15 Reimbursement Notice

This crypto-asset white paper has not been approved by any competent authority in any Member State of the European Union. The offeror of the crypto-asset is solely responsible for the content of this crypto-asset white paper.

In accordance with Article 13(4) of Regulation (EU) 2023/1114 (“MiCAR”), the 14-day right of withdrawal for retail purchasers does not apply to $NOT. The reason is that $NOT had already been admitted to trading on a trading platform for crypto-assets before any retail purchase in the Union could occur. Consequently, holders of $NOT are not entitled to any statutory or contractual refund or cooling-off period in respect of their purchases of the token.

### E.16 Refund Mechanism

N/A

### E.17 Refund Timeline

N/A

### E.18 Offer Phases

N/A

### E.19 Early Purchase Discount

N/A

### E.20 Time-Limited Offer

N/A

### E.21 Subscription Period Beginning

N/A

### E.22 Subscription Period End

N/A

### E.23 Safeguarding Arrangements for Offered Funds/Crypto-Assets

N/A

### E.24 Payment Methods for Crypto-Asset Purchase

N/A

### E.25 Value Transfer Methods for Reimbursement

N/A

### E.26 Right of Withdrawal

In accordance with Article 13(4) of Regulation (EU) 2023/1114, the 14-day right of withdrawal for retail purchasers does not apply to $NOT. The token had already been admitted to trading on a crypto-asset trading platform before any retail purchase could occur within the Union; therefore no statutory or contractual cooling-off period is available.

### E.27 Transfer of Purchased Crypto-Assets

N/A

### E.28 Transfer Time Schedule

N/A

### E.29 Purchaser's Technical Requirements

- **TON-compatible Jetton wallet**: $NOT is a Jetton token on TON, requiring storage in a wallet that supports the Jetton standard (e.g. Tonkeeper, MyTonWallet, or the built-in Telegram wallet).
- **Toncoin for transaction fees & notifications**: Every on-chain action incurs a small fee in Toncoin (TON). Wallets must hold enough TON to complete transfers and trigger Jetton notifications; without this, transfers may execute but remain undetected by exchanges and recipients.
- **Telegram linkage required**: Access to mining balances and redemption of Pre-Market vouchers requires linking the wallet to an active Telegram account via the official Notcoin bot. No separate app install is needed.
- **Optional exchange custody**: Holding $NOT on centralized exchanges requires completing their KYC/AML processes and enabling standard security measures (e.g. 2FA).
- **Future-wrapped tokens**: If $NOT is ever wrapped on another blockchain, holders will need a compatible wallet on that network. Each wrapped $NOT will be 1:1 backed by a token locked in a bridge contract.

### 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

N/A. The token seeks admission to trading on several EU platforms. No written agreements have been reached as of now, but these are expected to be formalised following the approval of this whitepaper.

This Whitepaper might be updated if $NOT is listed in additional exchanges, in accordance with Article 6 MiCAR.

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

N/A

**E.35 Trading Platforms Access**

N/A

**E.36 Involved Costs**

The trading platforms may have their own fee structures in place and holders are advised to familiarise themselves with the respective fee structure before accessing the trading platforms. The Issuer shall not charge any fees in this regard.

**E.37 Offer Expenses**

N/A

**E.38 Conflicts of Interest**

No Conflict of interest have been identified to date in relation to the admission to trading of $NOT token.

**E.39 Applicable Law**

St. Vincent and the Grenadines law.

**E.40 Competent Court**

Subject to mandatory applicable law, disputes arising from this white paper in connection with the $NOT token shall be subject to the exclusive jurisdiction of the courts of St. Vincent and the Grenadines.

# F. PART F - INFORMATION ABOUT THE CRYPTO-ASSETS

## F.1 Crypto-Asset Type

Utility Token

## F.2 Crypto-Asset Functionality

$NOT is a fungible Jetton token on The Open Network (TON) designed as the primary utility asset of the Notcoin ecosystem. It does not represent equity, debt, profit rights, or any claim on the issuer. Its functionality is limited to the following non-financial uses:

- **Conversion of in-game balances**: Telegram users who participated in the Notcoin tap-to-earn game may convert their mined balances into $NOT on a one-time basis following the token-generation event.
- **Voucher redemption**: Holders of Notcoin Pre-Market vouchers (NFTs minted on Getgems) may redeem them for $NOT at a fixed denomination after TGE.
- **Ecosystem utility**: $NOT is the medium of participation in Notcoin ecosystem features, including campaign entry, in-app upgrades, and future integrations such as NOT Gaming and NOT Earn.
- **Governance signalling**: In the forthcoming NOT DAO, holders may use $NOT to signal preferences on non-financial ecosystem matters such as campaign design and feature prioritisation. DAO votes do not convey ownership rights, financial entitlements, or enforceable claims against the issuer.
- **Transfer and trading**: $NOT may be freely transferred between TON-compatible wallets and traded on decentralized or centralized exchanges that support TON Jettons, subject to applicable regulatory requirements.

$NOT does not grant holders dividends, revenue shares, buy-back rights, or price guarantees. Its use is strictly confined to ecosystem access, participation, and governance within the Notcoin framework.

## F.3 Planned Application of Functionalities

The functionality of $NOT will be phased in according to the following roadmap:

- **Conversion of mining balances**: Available immediately following the token-generation event in April 2024. All balances earned during the Telegram tap-to-earn phase may be converted one-time into $NOT.

- **Voucher redemption**: Also effective from the token-generation event. Pre-Market vouchers minted on Getgems can be redeemed for $NOT at their fixed denomination at any time thereafter.
- **Transfers and trading**: $NOT became transferable across TON-compatible wallets at launch and is expected to be admitted to trading on MiCAR-compliant EU platforms progressively from 2024 onwards.
- **Ecosystem utilities**: Use of $NOT as the participation unit in campaigns and upgrades is already live within the Telegram Notcoin bot. Expansion into NOT Gaming and NOT Earn integrations is scheduled progressively during 2024–2025, depending on technical readiness.
- **Governance via NOT DAO**: The transition of ecosystem governance to a DAO framework is under development, with token-holder signalling expected to be enabled after the initial exchange listings and liquidity pools are established. No binding timeline is guaranteed, and deployment may be subject to regulatory and technical considerations.

All roadmap items are indicative only and may be delayed, altered or withdrawn depending on feasibility, community adoption, and applicable regulatory requirements.

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

OTHR - Other crypto-assets

**F.5 The type of submission**

NEWT - New white paper submission.

**F.6 Crypto-Asset Characteristics**

$NOT is a fungible crypto-asset that falls outside MiCAR's definitions of e-money tokens and asset-referenced tokens. Minted once, in a fixed amount of 102,456,956,826.91 units, it resides on The Open Network (TON) and follows the Jetton token standard. The token represents on-chain utility value only, conferring no dividend rights, redemption claims, or equity stake in the issuer.

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

NOT Token

**F.8 Website of the issuer**

https://notcoin.org/

### F.9 Starting date of admission to trading

2025-10-09

### F.10 Publication date (Whitepaper)

2025-10-09

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

The issuer acts as the minter of the $NOT token and the operator and creator of the Notcoin ecosystem, including:

- The NOTCOIN Tap-to-Earn application,
- The Notcoin Bot, available as a Telegram bot and mini-application, and
- The online platform store.notcoin.org.

The issuer's activities are focused on the operation and further development of the Notcoin ecosystem, including the Telegram mini-application, integration with the TON blockchain, and community engagement features such as NFT bonds and Web3 campaigns.

No other services are provided by the issuer that fall under Union or national financial services regulation. In particular, the issuer does not carry out payment services, electronic money issuance, or investment services within the meaning of existing EU legislation.

If, in the future, the issuer develops activities that fall within a regulated framework, such information will be disclosed to users and competent authorities in accordance with applicable law.

### F.12 Language or languages of the white paper

EN (English)

### F.13 Digital Token Identifier Code used to uniquely identify the crypto-asset or each of the several crypto assets to which the white paper relates, where available

Not available.

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

Not available. No ISO 24165 Digital Token Identifier has yet been assigned to $NOT.

### F.15 Voluntary data flag

True

### F.16 Personal data flag

True

### F.17 LEI eligibility

True – eligible

### F.18 Home Member State

Ireland

$NOT was not offered through a traditional public offering nor an Initial Coin Offering (ICO). Instead, the token was fully minted at launch and is available for trading on multiple centralized and decentralized crypto-asset exchanges. This structure allows users to acquire $NOT directly from the secondary market, without requiring a primary distribution phase. As such, admission to trading under MiCAR forms the legal basis for designating a Home Member State and identifying Host Member States within the European Union.

### F.19 Host Member States

1. Austria
2. Belgium
3. Bulgaria
4. Croatia
5. Cyprus
6. Czech Republic
7. Denmark
8. Estonia
9. Finland
10. France
11. Germany
12. Greece
13. Hungary

14. Italy
15. Latvia
16. Lithuania
17. Luxembourg
18. Malta
19. Netherlands
20. Poland
21. Portugal
22. Romania
23. Slovakia
24. Slovenia
25. Spain
26. Sweden
27. Iceland
28. Liechtenstein
29. Norway

$NOT was not offered through a traditional public offering nor an Initial Coin Offering (ICO). Instead, the token was fully minted at launch and is available for trading on multiple centralized and decentralized crypto-asset exchanges. This structure allows users to acquire $NOT directly from the secondary market, without requiring a primary distribution phase. As such, admission to trading under MiCAR forms the legal basis for designating a Home Member State and identifying Host Member States within the European Union.

# G. PART G - INFORMATION ON THE RIGHTS AND OBLIGATIONS ATTACHED TO THE CRYPTO-ASSETS

## G.1 Purchaser Rights and Obligations

The following inherent rights and obligations are attached to the $NOT token.

### Rights that come with $NOT

Holders of $NOT tokens may, subject to technical availability and applicable terms, exercise the following rights within the Notcoin ecosystem:

a) **Conversion Rights**: Users who participated in the Telegram tap-to-earn mining phase may convert their in-game balances into $NOT on a one-time basis following the token-generation event.

b) **Voucher Redemption:** Holders of Notcoin Pre-Market vouchers (NFTs minted on Getgems) may redeem them for $NOT at any time after TGE.

c) **Ecosystem Utility:** $NOT serves as the participation unit in community campaigns, in-app upgrades, and reward mechanisms accessible via the official Notcoin Telegram bot.

d) **Future Integrations:** Planned expansions such as NOT Gaming and NOT Earn will use $NOT as the sole medium of access and distribution, without conferring profit-sharing or entitlement to returns.

e) **Governance Participation (Planned):** In the forthcoming NOT DAO, holders may use $NOT to signal preferences on ecosystem development and community initiatives. DAO votes will be non-binding and confer no ownership or enforceable claim against the issuer.

f) **Transfer and Trading:** $NOT may be freely transferred between TON-compatible wallets and traded on decentralized and centralized exchanges that support Jetton tokens, subject to each venue's rules.

### Obligations and Conditions

a) **Payment of Platform and Network Fees:** All on-chain transactions on the TON blockchain require payment of network fees in Toncoin (TON). Holders must maintain a minimal TON balance to cover such costs.

b) **Compliance with Applicable Laws and Policies:** Users must comply with applicable Union, national, and local laws, including taxation and sanctions compliance, and adhere to the Notcoin Terms & Conditions. The issuer reserves the right to restrict access in cases of unlawful activity, illicit finance, or policy breaches.

c) **Self-Custody Responsibility:** $NOT is a non-custodial utility token. Holders are solely responsible for safeguarding their wallet credentials, seed phrases, and private keys. The issuer does not provide custodial services and cannot restore lost or compromised tokens.

d) **Exchange Custody (Optional):** Where $NOT is held on centralized exchanges, purchasers must complete the venue's KYC/AML requirements and use adequate account security measures such as two-factor authentication.

## G.2 Exercise of Rights and Obligation

Ownership of $NOT tokens grants holders only the rights explicitly outlined in this White Paper and those established under Regulation (EU) 2023/1114 and other applicable laws. No additional rights are conferred beyond these terms. Transfer of $NOT tokens to another address automatically assigns ownership to the recipient of that address.

Access to Notcoin ecosystem services is granted via wallet authentication. Rights are exercised automatically through smart-contract interaction on The Open Network (TON).

- **Wallet Connection Requirement:** Token holders must connect a TON-compatible Jetton wallet (e.g. Tonkeeper, MyTonWallet, Telegram @wallet) to execute transfers, redeem Pre-Market vouchers, and access ecosystem utilities.
- **No Custodial Services:** The Issuer does not provide custodial services for $NOT. Holders remain solely responsible for securing their wallets, private keys, and recovery phrases.
- **Issuer Does Not Store or Manage Holder Assets:** All $NOT tokens are managed directly by smart contracts deployed on the TON blockchain; the Issuer does not at any time hold, intermediate, or control purchaser balances.

By holding, using, or accessing $NOT tokens, each holder represents and warrants that:

- They comply with the provisions of this White Paper, the Notcoin Terms & Conditions, and all applicable laws and regulations;
- They are at least eighteen (18) years old;
- They will not employ $NOT for any unlawful purpose, including but not limited to money-laundering, fraud, terrorist financing, ransomware, illicit gambling, extortion, or prohibited market manipulation;

- They hold and use $NOT solely for their own account and are not nominees or agents of the Issuer unless expressly agreed in writing.

The Issuer, its affiliates, officers, directors, employees, and agents shall be liable only to the extent required by applicable law and as expressly stated in this White Paper. In particular, the Issuer bears no responsibility for (i) any use or misuse of $NOT, (ii) costs incurred in obtaining substitute goods or services arising from any transaction involving $NOT, or (iii) unauthorised access to or alteration of a holder's data or token transfers.

To the fullest extent permitted by law, the Issuer disclaims all warranties, express or implied, including without limitation implied warranties of merchantability and fitness for a particular purpose, and shall not be liable for any damages stemming from the possession or use of $NOT, whether direct, indirect, incidental, punitive, or consequential.

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

As provided by Article 12 of Regulation (EU) 2023/1114, any significant new factor, material mistake, or material inaccuracy that is capable of affecting the assessment of $NOT will be described in a modified version of this White Paper, notified to the competent authorities, and published on the Issuer's official website and communication channels.

### Modification & Suspension Scenarios

Rights and obligations of $NOT holders may be modified or suspended in the following circumstances:

- **Community Governance (Planned):** Future on-chain governance within the NOT DAO may introduce or amend non-financial participation rights, subject to the limits of utility-token classification under MiCAR.
- **Smart-Contract Upgrades or Migrations:** Technical updates to the TON Jetton contracts or related ecosystem smart contracts (e.g., voucher redemption, campaign participation) may alter how rights are exercised.
- **Fee Schedules:** Changes in TON network transaction fees or platform-specific service charges (e.g., voucher redemption or marketplace interactions) may affect the costs of exercising rights.
- **External Factors**: Regulatory directives, security incidents, or compliance requirements may require changes to service availability, DAO functionality, or integration of $NOT in partner platforms, potentially without prior notice.

Any modification materially affecting the rights or obligations of $NOT holders will be published in advance where possible and, in accordance with Article 12(6) MiCAR, notified to the competent authority before implementation.

### G.4 Future Public Offers

The Issuer does not plan to initiate any new public offerings of $NOT. The token was fully minted at launch and is currently acquired exclusively through secondary-market trading or protocol mechanisms.

However, the Issuer acknowledges that future listings on retail platforms such as Revolut may, depending on the commercial arrangement, qualify as a "public offer" under Article 3(1)(11) of Regulation (EU) 2023/1114. In particular, if Revolut were to distribute $NOT directly to retail users on behalf of the Issuer or its affiliates, such activity could constitute a public offer.

Should such a distribution occur, the Issuer will ensure that this White Paper is supplemented and updated in accordance with Article 12 MiCAR, and notified to the competent authority of the Home Member State. If Revolut merely facilitates secondary-market trading where tokens are sourced from existing holders, such admission will not constitute a new public offer.

See Section I.7a (Platform Distribution Risk) for a discussion of potential regulatory risks associated with such listings.

### G.5 Issuer Retained Crypto-Assets

The issuer retains the difference between max supply and circulating supply, which is approximately 2,270,421.521 NOT tokens.

### G.6 Utility Token Classification

True

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

The $NOT token provides users with access to a broad and evolving range of high-quality goods and services within the Notcoin ecosystem and its supporting infrastructure. For full details check Section D.7.

### G.8 Utility Tokens Redemption

$NOT functions as an on-chain participation and access tool for services within the Notcoin ecosystem. Redemption occurs directly through smart-contract interactions on The Open Network (TON), either via the official Notcoin Telegram bot, authorised mini-apps, or TON-compatible marketplaces such as Getgems.

**Redemption Process**

- **Wallet Connection:** A holder connects a TON-compatible wallet (e.g., Tonkeeper, MyTonWallet, or Telegram @wallet) to the Notcoin bot, campaign interface, or supported third-party application. The interface detects the $NOT balance in real time.
- **Selection of Goods/Services:** The holder selects the desired feature or service, which may include:
    - Conversion of balances: Redeem mined in-game balances or Pre-Market vouchers into $NOT.
    - Campaign participation: Join community challenges, Web3 missions, or partner integrations where $NOT is the required medium of access.
    - Upgrades and rewards: Apply $NOT for in-app enhancements, boosts, or other utility functions within the Notcoin bot.
    - Gaming integrations (roadmap): Use $NOT in expanded play modes or partner mini-apps.
    - Governance signalling (planned): Deploy $NOT voting weight within the NOT DAO for community proposals.
- **Confirmation of Price:** The interface displays the required $NOT amount together with the applicable TON network fee (payable in Toncoin).
- **On-Chain Payment:** The holder approves the transaction in their wallet. Upon confirmation on the TON blockchain, the specified $NOT amount is transferred to the relevant smart contract or ecosystem wallet.
- **Delivery of Goods/Services:**
    - For voucher redemption: the holder’s balance is credited with the equivalent $NOT.
    - For campaign access: the wallet address is automatically registered to participate.
    - For upgrades or rewards: the enhancement is applied immediately within the mini-app.
    - For DAO governance: the $NOT balance is linked to voting power at the time of the vote.

### G.9 Non-Trading Request

True

### G.10 Crypto-Assets Purchase or Sale Modalities

As trading is sought, no alternative resale framework is required. Purchasers may buy or sell $NOT tokens through the following channels:

- **Centralized Exchanges (CEXs):** $NOT is listed and freely tradable on recognized exchanges including Binance, OKX, Bybit, KuCoin, Gate.io, MEXC, Bitget, BitMart, BingX, LBank, CoinEx, WhiteBIT, and Bitvavo, among others. Listings are subject to each venue's admission criteria and regulatory obligations.
- **Decentralized Exchanges (DEXs):** $NOT may be traded on TON-based automated market makers such as STON.fi and DeDust, where liquidity pools are established and trading pairs (e.g., NOT/TON, NOT/USDT) are available.

### G.11 Crypto-Assets Transfer Restrictions

$NOT is a fungible Jetton token on The Open Network (TON) and, once in circulation, is freely transferable between TON-compatible wallets and trading venues that list the token. On-chain transfers require TON network fees (paid in Toncoin/TON) and may be subject to venue-specific KYC/AML checks where applicable.

**Allocation-based restrictions:**

- **Community Balances**: Tokens distributed through the Telegram tap-to-earn mining phase are freely transferable upon conversion to $NOT following TGE.
- **Pre-Market Vouchers**: Tokens redeemed from Pre-Market vouchers become freely transferable once credited to the holder's wallet.
- **Treasury Liquidity Reserves**: Royalties from Pre-Market voucher trading (20%) are earmarked for liquidity provisioning and listings. Movements from the treasury are operational transfers only (e.g., to DEX pools or CEX accounts). Tokens entering circulation from these reserves are freely transferable.

No team, advisor, or private-sale lock-ups have been announced, and apart from standard venue requirements (e.g., KYC/AML or withdrawal limits), no additional contractual or technical transfer restrictions apply to circulating $NOT.

## G.12 Supply Adjustment Protocols

False

## G.13 Supply Adjustment Mechanisms

N/A

## G.14 Token Value Protection Schemes

False

## G.15 Token Value Protection Schemes Description

None

## G.16 Compensation Schemes

False

## G.17 Compensation Schemes Description

None

## G.18 Applicable Law

St. Vincent and the Grenadines

## G.19 Competent Court

St. Vincent and the Grenadines

# H. PART H – INFORMATION ON THE UNDERLYING TECHNOLOGY

## H.1 Distributed ledger technology

The $NOT token is issued, stored, and transferred on The Open Network (TON), an open-source, Proof-of-Stake (PoS) public blockchain designed for high throughput, low-latency transactions, and seamless integration with Telegram mini-apps. TON achieves scalability through dynamic sharding and a "vertical block" architecture, enabling parallel processing of transactions across multiple workchains while maintaining a unified ledger.

$NOT follows the TON Jetton fungible-token standard (v1), which defines the interface and behaviour for fungible tokens on TON. Each holder interacts with an individual Jetton wallet contract linked to the $NOT Jetton master contract, ensuring accurate balance tracking and transfer execution.

The $NOT token is natively tradable between TON-compatible wallets and smart contracts. Beyond basic transfers, its utilities include conversion of in-game balances, voucher redemption, campaign participation, and future DAO voting. $NOT may also be traded on centralized and decentralized exchanges that support TON assets.

**General Information on Distributed Ledger Technology and Blockchain**

Distributed Ledger Technology (DLT) describes a peer-to-peer network in which numerous independent nodes collectively store, update, and verify a single dataset. Traditional databases depend on a central administrator for consistency and security; a DLT system removes that central point, requiring any change to be submitted, recorded, and confirmed by the network itself. Spreading responsibility in this way boosts resilience, enhances security, and provides data transparency without needing the participants to trust one another.

Blockchain is a particular implementation of DLT. In a blockchain the ledger expands through sequential "blocks" of transactions, each secured with cryptographic techniques and permanently linked to the one before it. Typical features include

- Distribution: Every node keeps its own full copy of the ledger and takes part in validating and synchronising transactions.
- Security: Each block contains the cryptographic hash of its predecessor, a timestamp, and transaction data. Modifying a single entry would require recalculating every subsequent hash and persuading a majority of nodes to accept the altered chain, making tampering impractical.

- Transparency and immutability: Most blockchains make the transaction history visible to all participants. Once a block is confirmed, the cryptographic links render its contents effectively permanent, preventing alteration or deletion.

## H.2 Protocols and Technical Standards

- **Token framework:** $NOT is a fungible Jetton-v1 token on The Open Network (TON). Jetton is TON's native fungible-token standard, defining a master contract that holds the token's core parameters and deploys per-holder Jetton Wallet contracts to manage balances and transfers. The $NOT Jetton master contract is deployed on the TON mainnet at: EQAvlWFDxGF2lXm67y4yzC17wYKD9A0guwPkMs1gOsM__NOT. The contract can be viewed via public TON block explorers such as tonscan.org or tonviewer.com to verify token metadata, supply, and transaction history.

- **Interaction model:** The Jetton standard supports common token operations such as transferring tokens between addresses, querying balances, and burning tokens from a wallet. These operations are implemented through TON's asynchronous message-passing architecture, with every transaction permanently recorded on-chain.

- **Wallet and marketplace compatibility:** $NOT can be sent, received, and held in TON-compatible wallets that support the Jetton standard, including Tonkeeper, MyTonWallet, and Telegram Wallet Bot. TON-based marketplaces and decentralized applications that integrate Jetton v1 may accept and transfer $NOT in accordance with their listing and integration criteria.

- **Underlying network:** The TON blockchain operates on a Proof-of-Stake consensus mechanism and employs a sharded architecture designed for high-throughput, low-latency transactions. All $NOT transfers require payment of network fees in Toncoin (TON), the native token of the TON blockchain.

## H.3 Technology Used

- **Token network and standard**: $NOT is issued, stored, and transferred on The Open Network (TON), a public, permissionless blockchain that anyone can read from, write to, and verify using standard TON node software. The token follows the TON Jetton fungible-token standard (v1), in which a Jetton master contract stores core parameters and deploys individual Jetton wallet contracts for each holder.

- **Wallet and transaction layer:** $NOT can be held and transferred using any Jetton-compatible TON wallet, including Tonkeeper, MyTonWallet, and the Telegram Wallet Bot. Transfers are initiated by the holder, signed locally in their wallet, and broadcast to the TON network.

- **Custody and key management:** In addition to user-controlled wallets, the issuer maintains a treasury balance of $NOT tokens derived from campaign fees and early payments made in the Notcoin Bot and Mini App. These treasury assets are secured in a multisignature wallet (multisig), which requires the approval of multiple designated signers for any transfer. The set-up mitigates single-point-of-failure risks and ensures operational continuity.

- **Transaction settlement and fees**: All $NOT transfers are settled on-chain and recorded immutably in the TON ledger. Network fees are paid in Toncoin (TON), the native token of the TON blockchain. The amount varies depending on the computational and storage requirements of each transaction.

- **Data integrity and availability:** Balances and transfers are publicly viewable and verifiable through TON block explorers. Transaction records cannot be altered or deleted once confirmed by the network's Proof-of-Stake consensus.

- **Security posture:** The $NOT token's functionality at the token layer follows the Jetton v1 standard, a widely adopted token interface in the TON ecosystem. Security of $NOT holdings depends on the TON protocol's consensus mechanism, validator performance, and the holder's adherence to secure key management practices.

### H.4 Consensus Mechanism

$NOT transactions are recorded on The Open Network (TON), which uses a Proof-of-Stake (PoS) consensus model combined with a dynamic sharding architecture to process transactions in parallel. In TON, validators stake Toncoin (TON) to participate in block production and transaction validation. The network consists of a masterchain and multiple workchains, each of which can split into shardchains when load increases.

- **Block production:** For each block, a validator from the active set is selected in proportion to its stake. That validator proposes a block containing recent transactions, which is then propagated to other validators for verification.

- **Validation:** Other validators verify the block's contents, digital signatures, and compliance with protocol rules. If valid, the block is signed and appended to the chain.

- **Finality:** Once a block is included in the masterchain (the root ledger linking all shardchains), it is considered finalized. TON's architecture ensures consistency across all shardchains by anchoring their state in the masterchain.

- **Efficiency:** TON achieves high throughput and low latency by processing transactions in multiple shardchains simultaneously, instead of requiring every validator to process every transaction globally.

- **Energy efficiency:** TON's PoS system relies on cryptographic proofs and stake-weighted voting rather than computationally intensive mining, keeping energy consumption broadly comparable to other PoS networks.

The combination of Proof-of-Stake validation and dynamic sharding enables TON to handle high transaction volumes while maintaining security through economic incentives, validator accountability, and protocol-level finality.

## H.5 Incentive Mechanisms and Applicable Fees

The TON blockchain uses a Proof-of-Stake (PoS) consensus mechanism in which validators stake Toncoin (TON) to participate in block production and transaction validation. Validators are rewarded in Toncoin through the collection of network fees and protocol-level rewards for producing valid blocks and securing the network.

**Applicable fees for $NOT transactions**

- **Network fees:** Every $NOT transfer or smart-contract interaction requires payment of a transaction fee in Toncoin (TON). This fee is determined by the TON protocol based on computational and storage requirements and is paid directly to the validators processing the transaction.

- **Issuer protocol fees:** The $NOT Jetton contract does not impose any additional on-chain transfer fee at the token layer. Peer-to-peer transfers between TON-compatible wallets are limited to the underlying TON network fees.

- **Application-level fees:** Certain ecosystem functions may require payment in $NOT. Examples include redeeming Pre-Market vouchers, participating in community campaigns or challenges, and (roadmap) accessing premium utilities such as NOT Gaming, NOT Earn, or governance-based services. These application-level fees are determined by the relevant smart contracts or platform interfaces at the time of use.

**Fee transparency**

Transaction fee amounts are displayed in the user's TON-compatible wallet prior to confirmation. All fee payments are recorded immutably on-chain and may be independently verified through public TON block explorers such as tonscan.org or tonviewer.com.

### H.6 Use of Distributed Ledger Technology

False

### H.7 DLT Functionality Description

$NOT exists natively as a Jetton v1 fungible token on The Open Network (TON), a public, permissionless Proof-of-Stake blockchain that uses a sharded architecture to process transactions in parallel. Independent validators stake Toncoin (TON) to participate in block production and validation across shardchains, with finality achieved when blocks are anchored in the masterchain. TON's design enables high-throughput, low-latency settlement, and all $NOT transfers are permanently recorded on-chain. Because TON is open to anyone who meets its staking requirements, the issuer has no ability to influence transaction ordering, censor transfers, or alter ledger history.

### H.8 Audit

False

### H.9 Audit Outcome

N/A. No audit has been conducted

# I. PART I – INFORMATION ON RISKS

## GENERAL RISK DISCLAIMER

Each user of the crypto-assets acts at their sole risk. All liability concerning the risks mentioned herein is excluded to the maximum extent permitted by law and specifically to MiCAR and applicable mandatory statutes.

## I.1 Offer-Related Risks

N/A as the crypto asset was not offered to the general public. Because the full 102,456,956,826.91 supply of $NOT was created at launch, the listing does not involve any future token minting or dilution. Residual market-supply risk is addressed through publicly viewable vesting contracts that disclose upcoming unlocks, and, as $NOT is neither an ART nor an EMT, no asset-reserve management or associated liability exposure applies.

The main risk to be considered is trading platforms that could not accept to list $NOT tokens for external reasons to our project.

## I.2 Issuer-Related Risks

- **Regulatory compliance:** Crypto-asset rules in the EU, US, and other jurisdictions are still evolving. If the issuer fails to adapt to MiCAR or other applicable laws, certain features or utilities linked to $NOT (e.g., campaign participation, DAO governance) could be restricted, suspended, or discontinued.
- **Operational resilience:** Any prolonged downtime, smart-contract coding error, or infrastructure failure on The Open Network (TON), or disruptions affecting the Notcoin Telegram bot and related integrations, could impair the ability of holders to transfer $NOT or access its utility functions.
- **Financial resources:** While the project has not conducted a token sale, its operational capacity depends on the effective use of treasury reserves (e.g., voucher royalties, ecosystem incentives). A significant shortfall or misallocation could delay development, reduce marketing activity, or weaken liquidity support.
- **Governance and transparency:** Until the planned NOT DAO is launched, decision-making authority remains concentrated in the core team. This concentration creates a risk of unilateral changes to roadmap priorities, allocation policies, or ecosystem partnerships without direct community input.

- **Key-person dependency:** The project's progress may depend on a limited number of individuals with unique expertise in TON infrastructure, Telegram integrations, and ecosystem development. Loss, unavailability, or departure of such persons could negatively affect delivery timelines or strategic continuity.

### I.3 Crypto-Assets-Related Risks

- **Market volatility**: $NOT may experience significant price fluctuations driven by overall crypto-market sentiment, liquidity changes, or project-specific developments (e.g., TON network updates, governance proposals, or ecosystem integrations).

- **Liquidity constraints**: Secondary-market depth may be limited, especially in periods of high volatility. This could affect the ability to buy or sell $NOT at expected prices, particularly if liquidity support from treasury reserves or voucher royalties is insufficient.

- **Custody exposure**: Control of $NOT depends entirely on holders' private keys. If wallets or recovery phrases are lost, stolen, or compromised (e.g., via phishing attacks or malware), tokens cannot be restored or replaced by the issuer.

- **Smart-contract flaws**: Although $NOT follows the Jetton standard on TON, undiscovered vulnerabilities in the $NOT contract or associated ecosystem contracts (e.g., voucher redemption, DAO governance, campaign integrations) could result in exploits, fund loss, or malfunctioning features.

- **Regulatory and tax uncertainty**: Authorities in different jurisdictions may reclassify $NOT in ways that trigger licensing, reporting, or tax obligations for holders. Centralized exchanges could delist the token to mitigate compliance exposure, reducing liquidity and market access.

### I.4 Project Implementation-Related Risks

- **Exchange listing risk**: The project cannot guarantee listings on specific centralized or decentralized exchanges. Listing delays, delistings, or refusal by platforms to admit $NOT could negatively affect liquidity and secondary market access.

- **Dependency on the TON blockchain**: $NOT relies entirely on The Open Network (TON) for token issuance, transfers, and smart-contract execution. Any outage, consensus failure, protocol exploit, or sustained network congestion could temporarily halt or degrade $NOT transactions and utilities.

- **Ecosystem integration risk**: A significant share of $NOT's planned functionality depends on Telegram mini-apps, bots, and other TON ecosystem integrations. Changes to Telegram's platform policies, bot framework, or TON's technical standards could disrupt or delay implementation of certain roadmap features such as NOT Gaming, NOT Earn, or DAO governance.

### I.5 Technology-Related Risks

- **Smart-contract vulnerabilities**: Although $NOT follows the TON Jetton standard, undetected bugs or design flaws in the $NOT contract or its related ecosystem contracts (voucher redemption, DAO governance, campaign integrations) may lead to unintended outcomes, including loss of tokens or disruption of transfers.

- **TON network risks**: $NOT depends entirely on The Open Network (TON). Network congestion, validator failures, consensus errors, or chain forks could delay, disrupt, or reverse pending transactions.

- **Irreversibility**: Transactions confirmed on TON are final and cannot be reversed. Accidental transfers (e.g., sending tokens to the wrong address) will result in permanent loss of the tokens.

- **Private-key management**: Loss of private keys or recovery phrases will result in permanent loss of access to the associated tokens. Holders are strongly advised to use secure wallet practices and offline storage solutions.

- **Cyber-threats**: Malware, phishing attempts, SIM-swap fraud, or wallet-provider breaches could compromise holder accounts and result in loss of $NOT.

- **Protocol vulnerabilities**: Flaws or exploits in the TON base-layer protocol could be used to disrupt services or manipulate balances.

- **Infrastructure risk**: Failures in internet connectivity, hosting providers, or validator infrastructure could affect the availability of wallets, the Notcoin Telegram bot, and other ecosystem dApps that support $NOT.

### I.6 Financial Risks

- **Price depreciation:** $NOT may lose significant value if demand decreases, ecosystem features are delayed, or community momentum slows. As a freely traded token, its price is highly sensitive to overall market sentiment and TON ecosystem developments.

- **Unregulated venues:** Trading of $NOT may occur on decentralized exchanges (DEXs) or smaller centralized venues with limited regulatory oversight. This increases exposure to risks such as fraud, insolvency, hacking, or market manipulation.

- **Liquidity fluctuations:** Market depth may vary across trading venues. Periods of low liquidity could amplify volatility and make it difficult for holders to execute trades at expected prices.

- **Treasury allocation risk:** Although no private sales or team allocations exist, treasury-managed reserves (e.g., liquidity support funded by voucher royalties) may be deployed in ways that unintentionally affect market supply and price stability.

### I.7 Regulatory and Legal Risks

- **Platform Distribution Risk:** The regulatory classification of future listings on retail platforms such as Revolut may vary across EU Member States. If Revolut distributes $NOT directly to its retail clients on behalf of the Issuer, such activity could be deemed a "public offer" under Regulation (EU) 2023/1114 (MiCAR). This may trigger additional disclosure, notification, or filing obligations for the Issuer, and failure to comply could lead to restrictions on the availability of $NOT in certain jurisdictions. Conversely, if Revolut only facilitates secondary-market trading between existing holders, no new public offer arises. The regulatory treatment of such listings is evolving and may be interpreted differently by competent authorities in the Union.

- **Jurisdictional differences:** The legal treatment of $NOT varies across jurisdictions. While designed and disclosed as a utility token under Regulation (EU) 2023/1114 (MiCAR), certain regulators outside the EU may classify $NOT as a security, commodity, or other regulated instrument, resulting in inconsistent application of rules.

- **Future restrictions:** Governments or regulatory authorities may impose new requirements or restrictions on the transfer, trading, or use of $NOT, including limits on exchange listings, wallet services, or DAO governance. Such measures could reduce the token's utility or liquidity.

- **Cross-border obligations:** Holders are individually responsible for complying with applicable laws in their jurisdiction, including tax-reporting obligations, anti-money-laundering and counter-terrorist financing (AML/CTF) requirements, and respecting prohibitions on crypto use where imposed.

- **Exchange and platform compliance:** Centralized exchanges may delist or restrict access to $NOT to reduce their compliance exposure under local laws, which may affect market access and liquidity.

## I.8 Mitigation Measures

$NOT is designed as a straightforward utility token on The Open Network (TON) with a fixed supply and a narrow set of defined functions, reducing the surface area for protocol and financial risk compared with complex DeFi systems. The project highlights the following mitigations:

- **Use of the TON Jetton fungible-token standard:** $NOT operates under the established Jetton framework on TON and integrates with Telegram mini-app workflows, avoiding bespoke wallet software and limiting custom code to essential voucher and conversion functions.
- **Non-custodial usage by default:** Holders retain control of their own wallets; the issuer does not operate custodial deposit programs or pooled user funds.
- **Fixed maximum supply and no token sale:** The entire supply of 102,456,956,826.91 $NOT was minted at TGE in April 2024. Distribution derives from tap-to-earn mining balances and Pre-Market voucher redemption, ensuring community-first allocation with no insider presales or preferential pricing.
- **Treasury use limited to liquidity support:** Royalties from Pre-Market voucher trading (20%) are earmarked for liquidity provisioning at listings. These reserves are deployed transparently on TON DEX pools or centralized venues without altering the fixed-supply model.
- **On-chain transparency:** All mints, transfers, voucher redemptions, and liquidity deployments are publicly verifiable on TON block explorers, allowing users to independently track token flows and balances.
- **No embedded leverage or yield:** $NOT functions solely as a utility token for access, participation, and governance signalling. It carries no lending, staking-yield, or profit-sharing features, reducing the risk of misinterpretation as an investment product.
- **Clear disclaimers:** The issuer has stated that $NOT confers no financial, redemption, or dividend rights, limiting reliance on off-chain commitments that technology cannot enforce.
- **Third-party safeguards:** Where the ecosystem interacts with regulated venues (e.g., centralized exchanges), additional KYC/AML checks and custody protections are provided by those platforms under their own frameworks. Users remain responsible for operational security, including safeguarding private keys, maintaining a small TON balance for gas, and using only official Notcoin links and bots.

## J. PART J - INFORMATION ON THE SUSTAINABILITY INDICATORS IN RELATION TO ADVERSE IMPACT ON THE CLIMATE AND OTHER ENVIRONMENT-RELATED ADVERSE IMPACTS

*Adverse impacts on climate and other environment-related adverse impacts.*

### J.1 Mandatory information on principal adverse impacts on the climate and other environment-related adverse impacts of the consensus mechanism

| **General information** | |
|---|---|
| **S.1 Name** | NOTCOIN LLC |
| **S.2 Relevant legal entity identifier** | N/A (LEI not yet obtained) |
| **S.3 Name of the crypto-asset** | $NOT |
| **S.4 Consensus Mechanism** | **Proof-of-Stake (PoS) with sharded architecture (The Open Network - TON)** |
| **S.5 Incentive Mechanisms and Applicable Fees** | Validators on TON are incentivised via protocol-level rewards and network fees paid in Toncoin for processing transactions. At the token layer, $DOGS imposes no additional transfer fee; peer-to-peer transfers incur only TON network fees. Any application-level fees (e.g., for the planned Sticker Platform) will be disclosed upon launch. |
| **S.6 Beginning of the period to which the disclosure relates** | 2024-08-18 |
| **S.7 End of the period to which the disclosure relates** | 2025-08-18 |
| **Mandatory key indicator on energy consumption** | |
| **S.8 Energy consumption**<br>Total amount of energy used for the validation of transactions and the maintenance of the integrity | Estimated total energy consumption for TON consensus operations is **~3,593,716.81 kWh/year**, based on the TON Sustainability Dashboard's annual consumption equivalent to |

| | |
|---|---|
| of the distributed ledger of transactions, expressed per calendar year | ~336 average US households (10,715 kWh/year). |
| **Sources and methodologies** | |
| **S.9 Energy consumption sources and Methodologies**<br><br>Sources and methodologies used in relation to the information reported in field S.8 | Estimation derived using:<br><br>● TON Sustainability Dashboard (value in household equivalents),<br>● Average US household electricity consumption figures from the U.S. EIA (2023),<br>● Methodology aligns with Commission Delegated Regulation (EU) 2025/422 Article 6(5). |

## J.2 Supplementary information on principal adverse impacts on the climate and other environment-related adverse impacts of the consensus mechanism

| **Supplementary key indicators on energy and GHG emissions** | |
|---|---|
| **S.10 Renewable energy consumption**<br>Share of energy used generated from renewable sources, expressed as a percentage of the total amount of energy used per calendar year, for the validation of transactions and the maintenance of the integrity of the distributed ledger of transactions. | 33.77% |
| **S.11 Energy intensity**<br>Average amount of energy used per validated transaction | 0.0000600 kWh per transaction (0.06 Wh/tx) |
| **S.12 Scope 1 DLT GHG emissions – Controlled**<br>Scope 1 GHG emissions per calendar year for the validation of transactions and the maintenance of the integrity of the distributed ledger of transactions | 0 t CO2e per calendar year |
| **S.13 Scope 2 DLT GHG emissions – Purchased**<br>Scope 2 GHG emissions, expressed in tCO2e per calendar year for the validation of transactions and the maintenance of the integrity of the distributed ledger of transactions | 1,020.83 $tCO_2e$/year |
| **S.14 GHG intensity**<br>Average GHG emissions (scope 1 and scope 2) per validated transaction | 0.0000170 kg/tx per transaction |
| **Sources and methodologies** | |
| **S.15 Key energy sources and methodologies**<br>Sources and methodologies used in relation to the information reported in fields S.10 and S.11 | Data supplied by TON Sustainability Dashboard; no deviations from Commission Delegated Regulation (EU) 2025/422 Article 6 (5) |
| **S.16 Key GHG sources and methodologies**<br>Sources and methodologies used in relation to the information reported in fields S.12, S.13 and S.14 | All optional-indicator data to be provided via third-party assurance once available |